



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

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

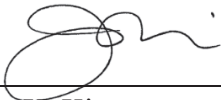



**TO:** Maggie Moran



**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.

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

By:   
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By: /s/ Anne L. Clark  
\_\_\_\_\_  
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## SCHEDULE

### A. General Definitions and Rules of Construction

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

thereof.

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

## **B. Particular Definitions**

1. “Complainant” means Jessica Bakeman, Charlotte Bennett, Lindsey Boylan, Karen Hinton, Ana Liss, Alyssa McGrath, Anna Ruch, and any other individual who has made any Complaints 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 the definition of “Complainant.”

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

### **C. Instructions**

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

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

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

to each other in Your files shall remain so attached in any production; or if such production is electronic, shall be accompanied by notation or information sufficient to indicate clearly such physical attachment.

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

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

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



#### **D. Documents to Be Produced**

1. Any and all Documents relating to any Complaint concerning the Governor, or anyone in the Executive Chamber or the Governor's staff, including but not limited to any Communication relating to any statement made or information provided to the media or the public.

2. Any and all Documents concerning any Complainant, including but not limited to any Communication relating to any statement made or information provided to the media or the public.

**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
      - yyymmdd
    - 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**

<b>FIELD NAME</b>	<b>FIELD DESCRIPTION</b>	<b>FIELD VALUE EXAMPLE<sup>1</sup></b>
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.	

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

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



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

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

AFFIDAVIT OF COMPLIANCE WITH SUBPOENA

State of \_\_\_\_\_ }  
County of \_\_\_\_\_ }

I, \_\_\_\_\_, being duly sworn, state as follows:

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

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

\_\_\_\_\_  
Signature of Affiant

\_\_\_\_\_  
Date

\_\_\_\_\_  
Printed Name of Affiant

\* \* \*

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

\_\_\_\_\_, Notary Public

My commission expires: \_\_\_\_\_



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

TO: Maggie Moran  
c/o Angelo Genova  
Genova Burns LLC  
494 Broad St.  
Newark, NJ 07102

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

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


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

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

EXHIBIT

2

**WITNESS, The Honorable Letitia James, Attorney General of the State of New York,**  
this 25th day of June, 2021.

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

By: /s/ Anne L. Clark  
\_\_\_\_\_  
Anne L. Clark  
Yannick Grant  
Special Deputies to the  
First Deputy Attorney General  
[REDACTED]@ag.ny.gov  
[REDACTED] ag.ny.gov



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### Thread

**Lindsey Boylan** @LindseyBoylan

Most toxic team environment? Working for @NYGovCuomo.

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

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

1,252 Retweets 311 Quote Tweets 9,293 Likes



**Lindsey Boylan** @LindseyBoylan · Dec 5, 2020  
Replying to @LindseyBoylan  
I've had many jobs. Waitressing at @Friendlys as a teenager was an infinitely more respectful environment. Even when I had bad customers who tipped poorly.

24 54 884

**Lindsey Boylan** @LindseyBoylan · Dec 5, 2020  
If people weren't deathly afraid of him, they'd be saying the same thing and you'd already know the stories.

26 85 1K

**Lindsey Boylan** @LindseyBoylan · Dec 5, 2020  
Seriously, the messages and texts I receive when I speak the truth about this...it's a whole book of people who have been harmed.

9 53 860

**Lindsey Boylan** @LindseyBoylan · Dec 5, 2020  
Don't be surprised that it's the same small group of white people sitting alongside him at every presser. The same group that he has had by him the whole time, doing his dirty work. If you're not one of those handful, your life working for him is endlessly dispiriting.

13 70 914

**Lindsey Boylan** @LindseyBoylan · Dec 5, 2020  
I tried to quit three times before it stuck. I've worked hard my whole life. Hustled - fake it till you make it style.

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

20 39 776

**Lindsey Boylan** @LindseyBoylan · Dec 5, 2020  
And I'm a privileged person. I could opt out and eventually did. I shudder to think what happens to others. It pisses me off so much.

7 26 672

**Lindsey Boylan** @LindseyBoylan · Dec 5, 2020  
Yes I did not sign whatever they told me to sign when I left. Nope!

29 30 936

**Marcella L. Simonetta** @marcellalaluna · Dec 5, 2020

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### Relevant people

**Lindsey Boylan** @LindseyBoylan  
Mom. Progressive P  
4 a Livable City. Fm  
& Urban Planner. C  
Manhattan Boroug

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

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

### What's happening

Entertainment · LIVE  
**Happy birthday, Tom Holla**  
Trending with Tom Holland

Music · Trending  
**JUST ANNOUNCED**  
17K Tweets

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

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

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

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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

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Relevant people

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

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

What's happening

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

Trending in United States
BOYFRIEND REVEAL
4,131 Tweets

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

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

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

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**Lindsey Boylan** @LindseyBoylan

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

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

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

1,085 Retweets 375 Quote Tweets 7,614 Likes



**Lindsey Boylan** @LindseyBoylan · Dec 13, 2020  
Replying to @LindseyBoylan

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

58 327 3.7K

**Lindsey Boylan** @LindseyBoylan · Dec 13, 2020

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

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

110 378 3.8K

**Lindsey Boylan** @LindseyBoylan · Dec 13, 2020

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

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

2.5K 13.8K 27.6K

**Lindsey Boylan** @LindseyBoylan · Dec 13, 2020

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

No one.

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

203 1K 7.5K

**Lindsey Boylan** @LindseyBoylan · Dec 13, 2020

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

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

714 2K 11.1K

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

### What's happening

World news · Yesterday  
**Chinese government says t  
first human case of H10N3  
flu is unlikely to spread**

Trending in United States  
**Concorde**  
1,700 Tweets

Music · Trending  
**Olamide**  
24.2K Tweets

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

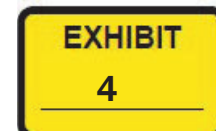
**BuzzFeed News** · Last nig  
**Tulsa Raised Millions of Do  
To Memorialize The 1921  
Massacre. Not Much Went  
The Black Community.**

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Message

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**From:** Josh Vlasto [REDACTED]  
**Sent:** 2/22/2021 3:50:25 PM  
**To:** Maggie Moran [REDACTED] Maggie Moran [REDACTED]@kivvit.com]; Richard Bamberger [REDACTED]  
**Subject:** 2/22/2021 10:50:25 AM -05:00 : Josh Vlasto [REDACTED] -> [Maggie Moran [REDACTED] Maggie Moran [REDACTED]@kivvit.com>; Richard Bamberger [REDACTED]  
**Attachments:** \_\_Library\_SMS\_Attachments\_dc\_12\_9F6687F6-41C1-42E5-A2CB-1589AEE965D3\_00BDE665-6BAC-42C4-A130-D0EC90C65A28.pluginPayloadAttachment

<https://twitter.com/LindseyBoylan/status/1363875088777445376>





← **Thread**



**Lindsey Boylan**   
@LindseyBoylan



We all make choices in life. @JVlasto was one of the first contacts I made in sending my resume in to work for the state. We are both parents. We both worked directly for @NYGovCuomo.

We are now worlds apart. He is defending an abuser. I refuse to let the abuse continue.

 **Nick Confessore**  @nickconfessore · Feb 22

In new story by @jessemckinley + @luisferre, designated hitter @JVlasto makes the case that Cuomo's bullying is already priced in by voters — and part of why they support him. [twitter.com/jessemckinley/...](https://twitter.com/jessemckinley/)

[Show this thread](#)

10:35 AM · Feb 22, 2021 · Twitter for iPhone

5 Retweets 31 Likes



**Lindsey Boylan**  @LindseyBoylan · Feb 22



Replying to @LindseyBoylan

I wouldn't be able to look myself in the mirror if I were still covering for and empowering an abuser like @NYGovCuomo the way that @JVlasto @melissadderosa @RichAzzopardi do on a regular basis. You are central to the violence.

 2

 3

 18



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Message

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**From:** Maggie Moran [REDACTED]  
**Sent:** 2/22/2021 3:57:14 PM  
**To:** Josh Vlasto [REDACTED] Maggie Moran [REDACTED]@kivvit.com]; Richard Bamberger [REDACTED]  
**Subject:** 2/22/2021 10:57:14 AM -05:00 : Maggie Moran [REDACTED] -> [Josh Vlasto <[REDACTED]>; Maggie Moran <[REDACTED]@kivvit.com>; Richard Bamberger [REDACTED]]

Should i tweet at Lindsey that the night of Cuomo primary victory she was [REDACTED] [REDACTED]? I guess not... Melissa tried to reach me this weekend but I couldn't get back to her due to some issues with [REDACTED] i am going to call her today. In a perfect world he would say he is sorry like a human and say he will be a kinder gentler Andrew but that will never happen. So... not sure if spending right now is a good idea. May be the only option if there are not friends will to do so. And i am not sure there are ...



# My story of working with Governor Cuomo



Lindsey Boylan Feb 24 · 8 min read

“Let’s play strip poker.”

I should have been shocked by the Governor’s crude comment, but I wasn’t.

We were flying home from an October 2017 event in Western New York on his taxpayer-funded jet. He was seated facing me, so close our knees almost touched. His press aide was to my right and a state trooper behind us.

“That’s exactly what I was thinking,” I responded sarcastically and awkwardly. I tried to play it cool. But in that moment, I realized just how acquiescent I had become.

Governor Andrew Cuomo has created a culture within his administration where sexual harassment and bullying is so pervasive that it is not only condoned but expected. His inappropriate behavior toward women was an affirmation that he liked you, that you must be doing something right. He used intimidation to silence his critics. And if you dared to speak up, you would face consequences.

That’s why I panicked on the morning of December 13.

While enjoying a weekend with my husband and six-year-old daughter, I spontaneously decided to share a small part of the truth I had hidden for so long in shame and never planned to disclose. The night before, a former Cuomo staffer confided to me that she, too, had been the subject of the Governor’s workplace harassment. Her story mirrored my own. Seeing his name floated as a potential candidate for U.S. Attorney General — the highest law enforcement official in the land — set me off.

In a few tweets, I told the world what a few close friends, family members and my therapist had known for years: Andrew Cuomo abused his power as Governor to sexually harass me, just as he had done with so many other women.

As messages from journalists buzzed on my phone, I laid in bed unable to move. I finally had decided to speak up, but at what cost?

Parts of a supposed confidential personnel file (which I've never seen) were leaked to the media in an effort to smear me. The Governor's loyalists called around town, asking about me.

Last week, Assemblymember Ron Kim spoke out publicly about the intimidation and abuse he has faced from Governor Cuomo and his aides. As Mayor de Blasio remarked, "the bullying is nothing new." There are many more of us, but most are too afraid to speak up.

I'm compelled to tell my story because no woman should feel forced to hide their experiences of workplace intimidation, harassment and humiliation — not by the Governor or anyone else.

I expect the Governor and his top aides will attempt to further disparage me, just as they've done with Assemblymember Kim. They'd lose their jobs if they didn't protect him. That's how his administration works. I know because I was a part of it.

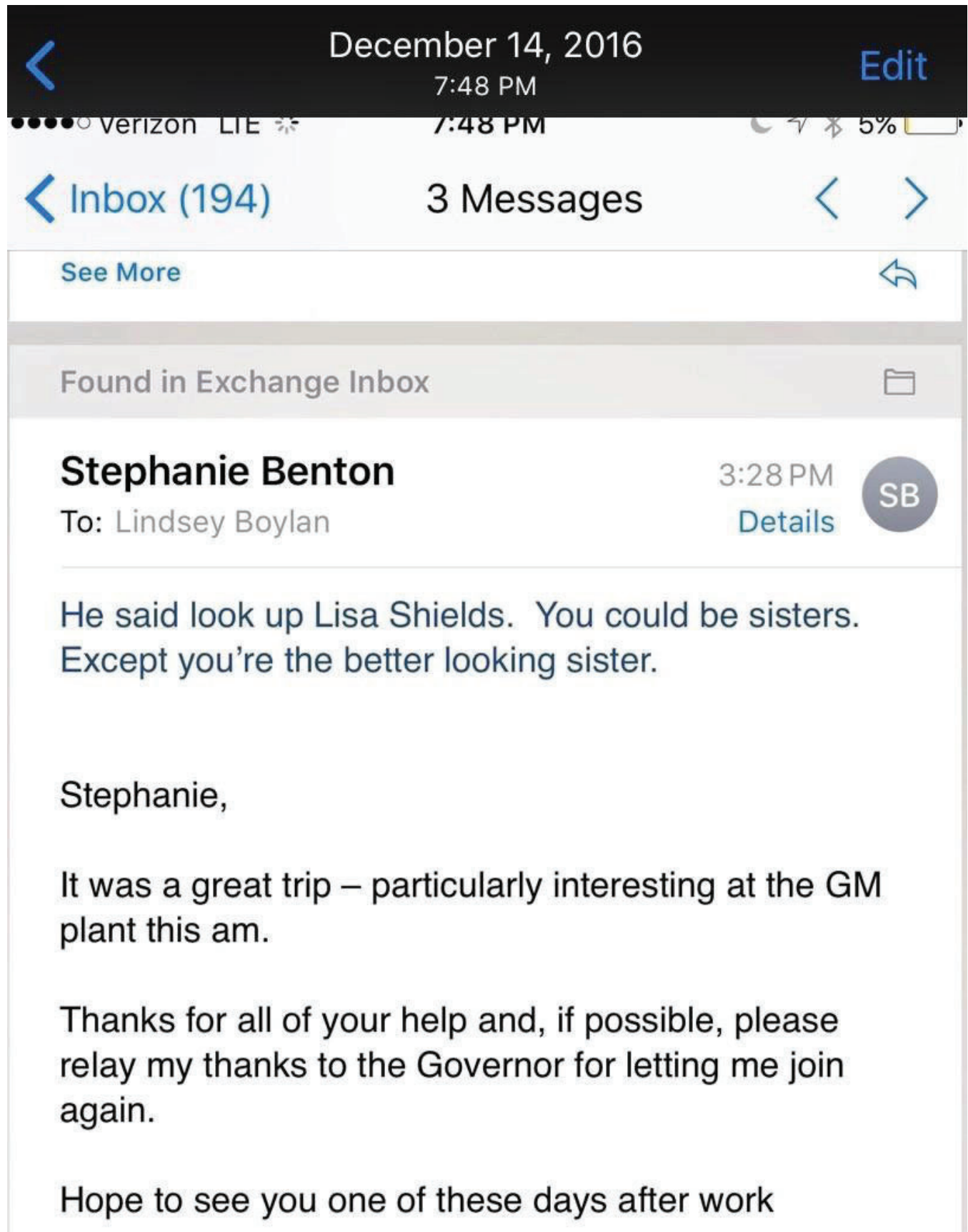
I joined state government in 2015 as a Vice President at Empire State Development. I was quickly promoted to Chief of Staff at the state economic development agency. The news of my appointment prompted a warning from a friend who served as an executive with an influential civic engagement organization: "Be careful around the Governor."

My first encounter with the Governor came at a January 6, 2016, event at Madison Square Garden to promote the new Pennsylvania Station-Farley Complex project. After his speech, he stopped to talk to me. I was new on the job and surprised by how much attention he paid me.

My boss soon informed me that the Governor had a "crush" on me. It was an uncomfortable but all-too-familiar feeling: the struggle to be taken seriously by a powerful man who tied my worth to my body and my appearance.

Stephanie Benton, Director of the Governor's Offices, told me in an email on December 14, 2016 that the Governor suggested I look up images of Lisa Shields — his

rumored former girlfriend — because “we could be sisters” and I was “the better looking sister.” The Governor began calling me “Lisa” in front of colleagues. It was degrading.



All my best,  
Linds

**Lindsey Boylan**  
Chief of Staff

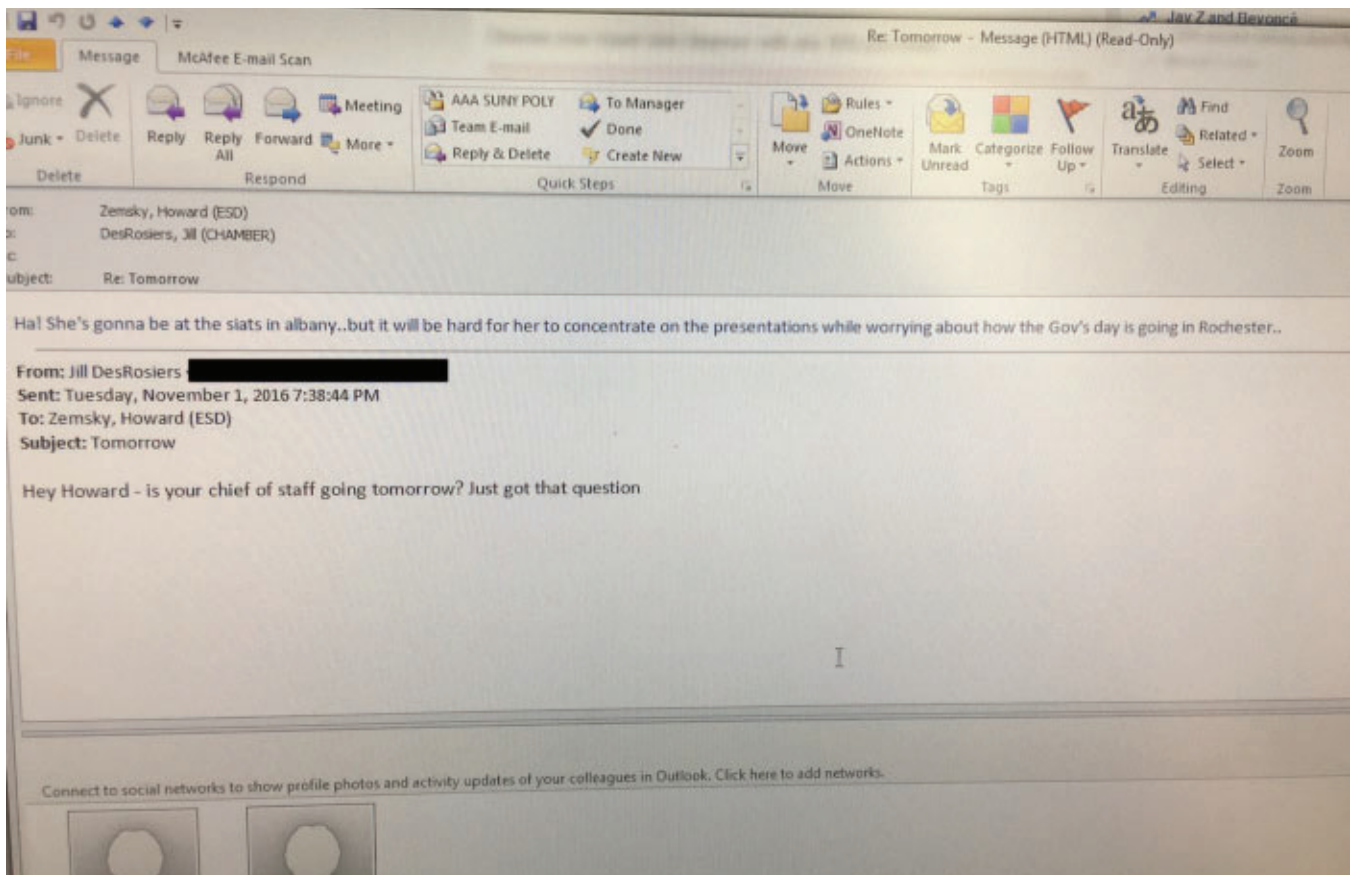
**Empire State Development**



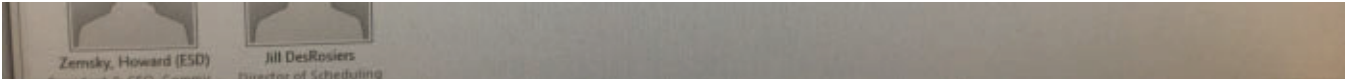
[www.esd.ny.gov](http://www.esd.ny.gov)

The Governor's staff was directed to tell me I looked like his rumored former girlfriend.

I had complained to friends that the Governor would go out of his way to touch me on my lower back, arms and legs. His senior staff began keeping tabs on my whereabouts. "He is a sexist pig and you should avoid being alone with him!" my mother texted me on November 4, 2016.



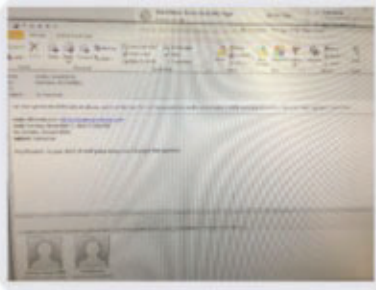




The Governor's senior staff member emailed my supervisor about my whereabouts.

11/4/16, 4:25 PM

Lindsey Boylan [redacted]



11/4/16, 4:25 PM

Lindsey Boylan [redacted]

This is why I don't trust gov

11/4/16, 4:25 PM (Viewed 11/4/16, 4:26 PM)

Lindsey Boylan [redacted]

This is his executive deputy asking if I would be at an even

11/4/16, 4:25 PM (Viewed 11/4/16, 4:26 PM)

Lindsey Boylan [redacted]

Event

11/4/16, 4:25 PM (Viewed 11/4/16, 4:26 PM)

Lindsey Boylan [redacted]

This is from the governor to my boss

11/4/16, 4:27 PM

Karen's iPhone [redacted]

Crazy! What is the event? Any reason that he would think you need to be there?

11/4/16, 4:28 PM

Lindsey Boylan [redacted]

There is no reason

11/4/16, 4:28 PM

Lindsey Boylan [redacted]

He was asking Bc he wanted to see me

11/4/16, 4:28 PM

Lindsey Boylan [redacted]

Although as chief of staff I go w my boss

11/4/16, 4:28 PM

Lindsey Boylan [redacted]

He was just being creepy

11/4/16, 4:28 PM

Lindsey Boylan [redacted]

He has a crush on me

11/4/16, 4:28 PM

Karen's iPhone [redacted]

He is a sexist pig and you should avoid being alone with him!

I shared my concern with my mother at the time.

The Governor's behavior made me nervous, but I didn't truly fear him until December 2016. Senior State employees gathered at the Empire State Plaza Convention Center in Albany to celebrate the holidays and our year's work. After his remarks, the Governor spotted me in a room filled with hundreds of people waiting to shake his hand. As he began to approach me, I excused myself from coworkers and moved upstairs to a more distant area of the party.

Minutes later, I received a call from an unlisted number. It was the Governor's body person. He told me to come to the Capitol because the Governor wanted to see me.

I made my way through the underground connection that linked the Plaza to the Capitol. As the black wrought-iron elevator took me to the second floor, I called my husband. I told him I was afraid of what might happen. That was unlike me. I was never afraid.

I exited the elevator to see the body person waiting for me. He walked me down the Hall of Governors. "Are there cameras here?" I asked him. I remembered my mother's text warning the month before. I worried that I would be left alone with the Governor. I didn't know why I was there. Or how it would end.

I was escorted into the Governor's office, past the desks of administrative assistants and into a room with a large table and historical artifacts. The door closed behind me. It was my first time in his Albany office. The Governor entered the room from another door. We were alone.

As he showed me around, I tried to maintain my distance. He paused at one point and smirked as he showed off a cigar box. He told me that President Clinton had given it to him while he served as the Secretary of Housing and Urban Development. The two-decade old reference to President Clinton's affair with Monica Lewinsky was not lost on me.

The Governor must have sensed my fear because he finally let me out of the office. I tried to rationalize this incident in my head. At least he didn't touch me. That made me feel safer.

His inappropriate gestures became more frequent. He gave roses to female staffers on Valentine's Day and arranged to have one delivered to me, the only one on my floor. A

signed photograph of the Governor appeared in my closed-door office while I was out. These were not-so-subtle reminders of the Governor exploiting the power dynamic with the women around him.

In 2018, I was promoted to Deputy Secretary for Economic Development and Special Advisor to the Governor. I initially turned the job down — not because I didn't want the responsibility or work but because I didn't want to be near him. I finally accepted the position at the Governor's insistence with one requirement — I would keep my old agency office and remain on a separate floor from him and his inner circle.

The Governor's pervasive harassment extended beyond just me. He made unflattering comments about the weight of female colleagues. He ridiculed them about their romantic relationships and significant others. He said the reasons that men get women were "money and power."

I tried to excuse his behavior. I told myself "it's only words." But that changed after a one-on-one briefing with the Governor to update him on economic and infrastructure projects. We were in his New York City office on Third Avenue. As I got up to leave and walk toward an open door, he stepped in front of me and kissed me on the lips. I was in shock, but I kept walking.

I left past the desk of Stephanie Benton. I was scared she had seen the kiss. The idea that someone might think I held my high-ranking position because of the Governor's "crush" on me was more demeaning than the kiss itself.

After that, my fears worsened. I came to work nauseous every day. My relationship with his senior team — mostly women — grew hostile after I started speaking up for myself. I was reprimanded and told to get in line by his top aides, but I could no longer ignore it.

On September 26, 2018, I sent a mass email informing staff members of my resignation.

There is a part of me that will never forgive myself for being a victim for so long, for trying to ignore behavior that I knew was wrong. The Governor exploited my weaknesses, my desire to do good work and to be respected. I was made to believe this was the world I needed to survive in.

It was all so normalized — particularly by Melissa DeRosa and other top women around him — that only now do I realize how insidious his abuse was.

After my tweets about the Governor in December, two women reached out to me with their own experiences. One described how she lived in constant fear, scared of what would happen to her if she rejected the Governor's advances. The other said she was instructed by the Governor to warn staff members who upset him that their jobs could be at risk. Both told me they are too afraid to speak out.

I know some will brush off my experience as trivial. We are accustomed to powerful men behaving badly when no one is watching. But what does it say about us when everyone is watching and no one says a thing?

Telling my truth isn't about seeking revenge. I was proud to work in the Cuomo Administration. For so long I had looked up to the Governor. But his abusive behavior needs to stop.

I am speaking up because I have the privilege to do so when many others do not. No one should have to be defined or destroyed by this kind of sexual harassment. Nor should they be revictimized if they decide to speak their own truth.

I hope that sharing my story will clear the path for other women to do the same.

Message

---

**From:** Melissa DeRosa [REDACTED]  
**Sent:** 2/24/2021 8:28:40 PM  
**To:** Beth Garvey [REDACTED]; +Rich Azzopardi +Linda Lacewell Stephanie BentonCell [REDACTED]; Josh Vlasto [REDACTED]; +Judy Mogul JeffPollock [REDACTED]; Dani [REDACTED]; Maggie Moran [REDACTED]; Lis Smith [REDACTED]; +Peter Ajemian Maggie Moran [REDACTED]@kivvit.com]; +Steve Cohen [REDACTED]  
**Subject:** 2/24/2021 3:28:40 PM -05:00 : Melissa DeRosa [REDACTED] -> [13 parties]

should we get people putting out statements?



Message

---

**From:** Lis Smith [REDACTED]  
**Sent:** 2/24/2021 8:28:57 PM  
**To:** Maggie Moran [REDACTED]@kivvit.com]; Stephanie Benton Cell [REDACTED] Jeff Pollock [REDACTED]  
+Judy Mogul [REDACTED] Josh Vlasto [REDACTED] Melissa DeRosa [REDACTED] Dani [REDACTED]  
+Linda Lacewell [REDACTED] +Rich Azzopardi [REDACTED] +Steve Cohen [REDACTED] Beth Garvey [REDACTED] Maggie Moran [REDACTED]  
+Peter Ajemian [REDACTED]  
**Subject:** 2/24/2021 3:28:57 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

who do you have that is supportive

Message

---

**From:** Melissa DeRosa [REDACTED]  
**Sent:** 2/24/2021 8:29:11 PM  
**To:** +Linda Lacewell +Rich Azzopardi Lis Smith [REDACTED] +Steve Cohen Stephanie Benton Cell [REDACTED]  
[REDACTED] +Judy Mogul Josh Vlasto [REDACTED] Maggie Moran [REDACTED]; Dani [REDACTED]  
+Peter Ajemian Jeff Pollock [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; Beth Garvey ([REDACTED]  
[REDACTED])  
**Subject:** 2/24/2021 3:29:11 PM -05:00 : Melissa DeRosa [REDACTED] > -> [13 parties]

Former people who are in the chamber

Message

---

**From:** Melissa DeRosa [REDACTED]  
**Sent:** 2/24/2021 8:29:20 PM  
**To:** +Linda Lacewell Stephanie Benton Cell [REDACTED] Josh Vlasto [REDACTED]; +Steve Cohen [REDACTED]  
+Peter Ajemian Dani [REDACTED]; BethGarvey [REDACTED] +Judy Mogul Maggie Moran [REDACTED]  
[REDACTED]; +Rich Azzopardi Lis Smith [REDACTED] Maggie Moran [REDACTED]@kivvit.com]; Jeff Pollock [REDACTED]  
**Subject:** 2/24/2021 3:29:20 PM -05:00 : Melissa DeRosa [REDACTED] -> [13 parties]

who would say these things are not true



Message

---

**From:** Jeff Pollock [REDACTED]  
**Sent:** 2/24/2021 8:29:43 PM  
**To:** Stephanie Benton Cell [REDACTED]; Lis Smith [REDACTED]; +Judy Mogul [REDACTED] Melissa DeRosa [REDACTED]  
[REDACTED] Maggie Moran [REDACTED]; +Linda Lacewell [REDACTED] +Rich Azzopardi [REDACTED] +Steve Cohen [REDACTED] +Peter Ajemian [REDACTED]  
BethGarvey [REDACTED]; Josh Vlasto [REDACTED]; Dani [REDACTED] Maggie Moran [REDACTED]  
[REDACTED]@kivvit.com]  
**Subject:** 2/24/2021 3:29:43 PM -05:00 : Jeff Pollock [REDACTED] -> [13 parties]

That would not be my inclination

Message

---

**From:** Jeff Pollock [REDACTED]  
**Sent:** 2/24/2021 8:29:56 PM  
**To:** +Rich Azzopardi Lis Smith [REDACTED]; +Steve Cohen Maggie Moran [REDACTED]@kivvit.com]; Dani [REDACTED]  
[REDACTED] Maggie Moran [REDACTED]; Josh Vlasto [REDACTED] +Peter Ajemian Beth Garvey [REDACTED]  
[REDACTED] +Judy Mogul Stephanie Benton Cell [REDACTED] Melissa DeRosa [REDACTED]  
+Linda Lacewell  
**Subject:** 2/24/2021 3:29:56 PM -05:00 : Jeff Pollock [REDACTED] -> [13 parties]

Unless they have direct knowledge of something

Message

---

**From:** Lis Smith [REDACTED]  
**Sent:** 2/24/2021 8:32:05 PM  
**To:** +Linda Lacewell; Jeff Pollock [REDACTED]; Dani [REDACTED]; Maggie Moran [REDACTED]@kivvit.com];  
Stephanie Benton Cell [REDACTED]; Beth Garvey [REDACTED]; +Peter Ajemian; Maggie Moran [REDACTED];  
+Judy Mogul; +Steve Cohen; Melissa DeRosa [REDACTED]; Josh Vlasto [REDACTED];  
+Rich Azzopardi  
**Subject:** 2/24/2021 3:32:05 PM -05:00 : Lis Smith <[REDACTED]> -> [13 parties]

Yeah those statements usually don't do anything.

Message

---

**From:** Lis Smith [REDACTED]  
**Sent:** 2/24/2021 8:32:21 PM  
**To:** Josh Vlasto [REDACTED] Beth Garvey [REDACTED]; StephanieBenton Cell [REDACTED]  
+Steve Cohen Dani ([REDACTED]); Melissa DeRosa [REDACTED]; +Rich Azzopardi Maggie Moran [REDACTED]  
[REDACTED]; +Judy Mogul +Linda Lacewell +Peter Ajemian Maggie Moran [REDACTED]@kivvit.com]; Jeff Pollock [REDACTED]  
[REDACTED]  
**Subject:** 2/24/2021 3:32:21 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

Like i would make sure you have a list of people you know who have his back, b/c we may need to call on them at some point for something

Message

---

**From:** Lis Smith [REDACTED]  
**Sent:** 2/24/2021 8:32:38 PM  
**To:** +Steve Cohen +Rich Azzopardi +Linda Lacewell +Peter Ajemian Jeff Pollock [REDACTED] +Judy Mogul Josh Vlasto [REDACTED]; Stephanie BentonCell [REDACTED]; Beth Garvey [REDACTED]; Maggie Moran [REDACTED@kivvit.com]; Dani [REDACTED]; Maggie Moran [REDACTED] Melissa DeRosa [REDACTED]  
**Subject:** 2/24/2021 3:32:38 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

what about legislators ? women's leaders? have you taken t heir temperature?

Message

---

**From:** Josh Vlasto [REDACTED]  
**Sent:** 2/24/2021 8:46:35 PM  
**To:** Jeff Pollock [REDACTED] +Peter Ajemian Maggie Moran [REDACTED] Maggie Moran [REDACTED]@kivvit.com]; +Linda Lacewell Beth Garvey [REDACTED]; Stephanie Benton Cell [REDACTED] Melissa DeRosa [REDACTED]; +Rich Azzopardi +Judy Mogul Lis Smith [REDACTED]; Dani [REDACTED] +Steve Cohen [REDACTED]  
**Subject:** 2/24/2021 3:46:35 PM -05:00 : Josh Vlasto [REDACTED] -> [13 parties]

Robbie Kaplan is the best play right now



Message

---

**From:** Josh Vlasto [REDACTED]  
**Sent:** 2/24/2021 8:46:45 PM  
**To:** Maggie Moran [REDACTED]; +Judy Mogul [REDACTED]; Melissa DeRosa [REDACTED]; +Rich Azzopardi [REDACTED]; Stephanie Benton Cell [REDACTED]; Beth Garvey [REDACTED]; Dani [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; +Steve Cohen [REDACTED]; +Linda Lacewell [REDACTED]; +Peter Ajemian [REDACTED]; Lis Smith [REDACTED]; Jeff Pollock [REDACTED]  
**Subject:** 2/24/2021 3:46:45 PM -05:00 : Josh Vlasto [REDACTED] -> [13 parties]

Get it out and refer everything to that

Message

---

**From:** Josh Vlasto [REDACTED]  
**Sent:** 2/24/2021 8:47:11 PM  
**To:** +Linda Lacewell Maggie Moran [REDACTED]@kivvit.com]; Lis Smith [REDACTED]; Dani [REDACTED]; Beth Garvey [REDACTED]; Melissa DeRosa [REDACTED] +Rich Azzopardi +Peter Ajemian Stephanie Benton Cell [REDACTED]; +Judy Mogul +Steve Cohen Maggie Moran [REDACTED] Jeff Pollock [REDACTED]  
**Subject:** 2/24/2021 3:47:11 PM -05:00 : Josh Vlasto [REDACTED] -> [13 parties]

Facts are fact



**Date:** Wednesday, February 24 2021 10:29 AM

**Subject:** [Chat #66705]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran];

---

We are back down the rabbit hole

**----METADATA INFORMATION----**

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]



**Date:** Wednesday, February 24 2021 10:29 AM

**Subject:** [Chat #66706]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran];

---

Gov having fits on the radio

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Wednesday, February 24 2021 10:35 AM

**Subject:** [Chat #66707]

**From:** Maggie Moran <+ [REDACTED] >

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

---

Start asking him questions. Why didn't u say it at the time. U were being extorted?!

**----METADATA INFORMATION----**

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Wednesday, February 24 2021 10:41 AM

**Subject:** [Chat #66708]

**From:** Maggie Moran <+ [REDACTED] >

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

---

Ugh

**----METADATA INFORMATION----**

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Wednesday, February 24 2021 10:41 AM

**Subject:** [Chat #66709]

**From:** Maggie Moran <+ [REDACTED] >

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

---



**----METADATA INFORMATION----**

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Wednesday, February 24 2021 10:41 AM

**Subject:** [Chat #66710]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran];

---

This never ends

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Wednesday, February 24 2021 10:48 AM

**Subject:** [Chat #66711]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran];

---

It really is bullshit

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Wednesday, February 24 2021 10:48 AM

**Subject:** [Chat #66712]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran];

---

Lindsey asked me repeatedly to push her name for the job

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]



**Date:** Wednesday, February 24 2021 10:48 AM

**Subject:** [Chat #66713]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran];

---

In the chamber

**----METADATA INFORMATION----**

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Wednesday, February 24 2021 11:08 AM

**Subject:** [Chat #66715]

**From:** Maggie Moran <[REDACTED]>

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

---

[REDACTED]  
[REDACTED] Hopping off pls let them know if they search for me

----METADATA INFORMATION-----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Wednesday, February 24 2021 11:37 AM

**Subject:** [Chat #66717]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran];

---

Gov and Melissa want us

**----METADATA INFORMATION----**

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Wednesday, February 24 2021 11:37 AM

**Subject:** [Chat #66718]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran];

---

On Boylan

**----METADATA INFORMATION----**

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Wednesday, February 24 2021 11:40 AM

**Subject:** [Chat #66719]

**From:** Maggie Moran <+ [REDACTED] >

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

---

I can't [REDACTED]

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Wednesday, February 24 2021 11:40 AM

**Subject:** [Chat #66720]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran];

---

K

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Wednesday, February 24 2021 01:21 PM

**Subject:** [Chat #66721]

**From:** Maggie Moran <+ [REDACTED] >

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

---

Are u on a call now with them?

**----METADATA INFORMATION----**

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Wednesday, February 24 2021 01:21 PM

**Subject:** [Chat #66723]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran];

---

Will join after

**----METADATA INFORMATION----**

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]



Message

---

**From:** Josh Vlasto [REDACTED]  
**Sent:** 2/25/2021 12:26:01 AM  
**To:** +Peter Ajemian Lis Smith [REDACTED]; Jeff Pollock [REDACTED]; Dani [REDACTED]; Melissa DeRosa [REDACTED]; +Judy Mogul Maggie Moran [REDACTED]; +Linda Lacewell +Steve Cohen +Rich Azzopardi Stephanie Benton Cell [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; Beth Garvey [REDACTED]  
**Subject:** 2/24/2021 7:26:01 PM -05:00 : Josh Vlasto [REDACTED] -> [13 parties]

A thought. Is there a flip for him to be somewhat defiant and bring both together. "I know there is a lot of news and noise out there. Most of it is just the same people playing the same old politics. People are throwing a lot of shit at me and that's fine. This is a tough business and we're used to it. They have their agendas and their politics. It's not going to stop us. We are in the greatest crisis facing this city and state. We are focused on that and only that. No games, no distractions just facts and progress. We are working day and night, fighting to get this state back up and running and your lives back to normal. That's it. I can take the hits. This team can take the hits. It's not going to stop us for getting the job done for New Yorkers. We aren't going to be distracted, we aren't going to slow down for one second.



Message

---

**From:** Lis Smith [REDACTED]  
**Sent:** 2/25/2021 12:27:09 AM  
**To:** Jeff Pollock [REDACTED]; Stephanie Benton Cell [REDACTED]; Dani [REDACTED] +Judy Mogul [REDACTED]  
Maggie Moran [REDACTED] Melissa DeRosa [REDACTED]; +Steve Cohen [REDACTED] Maggie Moran [REDACTED]  
[REDACTED]@kivvit.com]; Josh Vlasto [REDACTED]; +Rich Azzopardi [REDACTED] +Linda Lacewell [REDACTED] +Peter Ajemian [REDACTED] Beth Garvey [REDACTED]  
**Subject:** 2/24/2021 7:27:09 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

I think that gets into dangerous territory

Message

---

**From:** Lis Smith [REDACTED]  
**Sent:** 2/25/2021 12:27:23 AM  
**To:** Beth Garvey [REDACTED]; +Rich Azzopardi Dani [REDACTED]; +Judy Mogul [REDACTED] Josh Vlasto [REDACTED]  
[REDACTED] Melissa DeRosa [REDACTED]; +Peter Ajemian Maggie Moran [REDACTED]@kivvit.com]; StephanieBenton  
Cell [REDACTED]; Jeff Pollock [REDACTED]; +Steve Cohen Maggie Moran [REDACTED]  
+Linda Lacewell  
**Subject:** 2/24/2021 7:27:23 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

People are sick of hearing from him about political plots

Message

---

**From:** Lis Smith [REDACTED]  
**Sent:** 2/25/2021 12:27:39 AM  
**To:** Maggie Moran ([REDACTED]@kivvit.com); +Steve Cohen [REDACTED]; Jeff Pollock [REDACTED]; Melissa DeRosa [REDACTED]; +Judy Mogul [REDACTED]; Dani [REDACTED]; Beth Garvey [REDACTED]; Stephanie Benton Cell [REDACTED]; Maggie Moran [REDACTED]; +Rich Azzopardi [REDACTED]; Josh Vlasto [REDACTED]; +Linda Lacewell [REDACTED]; +Peter Ajemian [REDACTED]  
**Subject:** 2/24/2021 7:27:39 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

The sooner he can just get back to April cuomo, the better

Message

---

**From:** Josh Vlasto [REDACTED]  
**Sent:** 2/25/2021 12:29:04 AM  
**To:** Lis Smith [REDACTED]; Beth Garvey [REDACTED] +Steve Cohen +Judy Mogul +Peter Ajemian  
Melissa DeRosa [REDACTED] +Linda Lacewell Dani [REDACTED] +Rich Azzopardi Maggie Moran  
[REDACTED]@kivvit.com]; Maggie Moran [REDACTED] Stephanie Benton Cell [REDACTED] Jeff Pollock [REDACTED]  
**Subject:** 2/24/2021 7:29:04 PM -05:00 : Josh Vlasto [REDACTED] -> [13 parties]

I think that's right for reporters

Message

---

**From:** Josh Vlasto [REDACTED]  
**Sent:** 2/25/2021 12:29:05 AM  
**To:** Maggie Moran [REDACTED@kivvit.com]; Melissa DeRosa [REDACTED]; Beth Garvey [REDACTED]; Maggie Moran [REDACTED] Dani [REDACTED]; Lis Smith [REDACTED]; +Steve Cohen +Rich Azzopardi +Judy Mogul +Peter Ajemian Jeff Pollock [REDACTED]; +Linda Lacewell Stephanie Benton Cell [REDACTED]  
**Subject:** 2/24/2021 7:29:05 PM -05:00 : Josh Vlasto <[REDACTED]> -> [13 parties]

For sure

Message

---

**From:** Josh Vlasto [REDACTED]  
**Sent:** 2/25/2021 12:29:12 AM  
**To:** +Judy Mogul Dani [REDACTED]; Lis Smith [REDACTED]; StephanieBenton Cell [REDACTED]  
+Peter Ajemian Melissa DeRosa [REDACTED]; Maggie Moran [REDACTED] +Linda Lacewell Jeff Pollock  
[REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; +Rich Azzopardi +Steve Cohen Beth Garvey [REDACTED]  
[REDACTED]  
**Subject:** 2/24/2021 7:29:12 PM -05:00 : Josh Vlasto <[REDACTED]> -> [13 parties]

I'm not so sure about the public

Message

---

**From:** Josh Vlasto [REDACTED]  
**Sent:** 2/25/2021 7:09:14 PM  
**To:** Maggie Moran [REDACTED] Maggie Moran [REDACTED]@kivvit.com]; +Judy Mogul Stephanie Benton Cell [REDACTED]; Jeff Pollock [REDACTED]; Dani [REDACTED]; Melissa DeRosa [REDACTED]; Beth Garvey [REDACTED] +Rich Azzopardi +Linda Lacewell Lis Smith [REDACTED]; +Peter Ajemian +Steve Cohen  
**Subject:** 2/25/2021 2:09:14 PM -05:00 : Josh Vlasto [REDACTED] -> [13 parties]

Rich or Peter, one of you should reach out Wapo just to connect formally. I am talking to Josh again at 4





---

**From:** Melissa DeRosa [REDACTED]@gmail.com> on behalf of Melissa DeRosa [REDACTED]@gmail.com>  
**To:** Maggie Moran  
**CC:** Richard Bamberger; Josh Vlasto  
**Sent:** 2/25/2021 9:42:56 AM  
**Subject:** Re: Gov. Cuomo Impact Report

can we get updated?

On Wed, Feb 24, 2021 at 4:38 PM Maggie Moran [REDACTED]@kivvit.com> wrote:  
FYI

Lindsey Boylan's story has gained traction quickly, especially among likely Democrats and Independents.

- \* Coverage of Lindsey Boylan's story has broken through quickly, with her original Medium post and coverage of the post breaking into the top 10 most engaged with articles in the past 24 hours a few hours after publication.

- \* Fox News was the first major news outlet to publish the story, including a push notification to all app users to increase visibility. In the intervening hours, mainstream and progressive outlets have also picked up the story and gotten significant traction. Social interactions on these stories are expected to double in the next few hours.

- \* Stories from the families of people who died of COVID from nursing homes also gained traction on Tuesday as negative coverage of the Marist poll about the Governor's fall in approval rating and a negative outlook for his next election. An additional angle on the Ron Kim story from journalists sharing their interactions with the Governor gained traction among conservative outlets on Tuesday as well.

- \* A few hours after Lindsey Boylan posted her story on Medium, the Medium story is already the most shared link among likely Democrats and Independents and has been shared 3x as much as any other link by this audience in the past 24 hours.

- \* Lindsey Boylan's story has been more prominent among likely Democrats and Independents than in the general audience discussing the Governor – likely Democrats and Independents have mentioned Boylan's story in 27% of their posts today so far, compared to 18% of today's posts among all Twitter users mentioning the Governor. Her story has also coincided with an increase in discussion of impeachment among likely Democrats and Independents.

- \* Six state lawmakers have Tweeted about Lindsey Boylan's story and in support of her story, five of whom are Democrats.

[REDACTED]  
Insights Principal

NEW YORK  
200 Varick Street  
New York, NY 10014

o: [REDACTED]  
c: [REDACTED]

[signature\_1362335945]

[KIVVIT.COM](http://kivvit.com/)<<http://kivvit.com/>> I [TWITTER](https://twitter.com/TeamKivvit)<<https://twitter.com/TeamKivvit>> I [FACEBOOK](https://www.facebook.com/Kivvit/)<<https://www.facebook.com/Kivvit/>>



--

Melissa D. DeRosa



Message

---

**From:** Lis Smith [REDACTED]  
**Sent:** 2/26/2021 4:51:17 AM  
**To:** Maggie Moran [REDACTED]@kivvit.com]; +Judy Mogul [REDACTED] +Steve Cohen [REDACTED] +Rich Azzopardi [REDACTED] Josh Vlasto [REDACTED]  
[REDACTED]; Beth Garvey [REDACTED]; Melissa DeRosa [REDACTED]; Jeff Pollock [REDACTED]; Maggie  
Moran [REDACTED]; +Peter Ajemian [REDACTED] Dani [REDACTED]; Stephanie Benton Cell [REDACTED]  
+Linda Laceywell [REDACTED]  
**Subject:** 2/25/2021 11:51:17 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]  
**Attachments:** IMG\_5056.jpeg





# Charlotte Bennett

434 Likes



Tweets

Tweets & replies

Media

Likes

**Kaitlin**

· 1d



Replying to @jessemckinley

@NYGovCuomo and @LindseyBoylan

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



**Kaitlin**

· 1d



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



**Lindsey Boylan**

@Lindsey... · 1d

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



**Jesse McKinley**

@jessemckinley · 1d



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

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



Message

---

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

Look at the likes from kaitlin [REDACTED] and charlotte

Message

---

**From:** Lis Smith [REDACTED]  
**Sent:** 2/26/2021 5:11:51 AM  
**To:** Maggie Moran [REDACTED]@kivvit.com]; +Linda Lacewell Stephanie Benton Cell [REDACTED]; Josh Vlasto [REDACTED]; +Peter Ajemian Jeff Pollock [REDACTED]; +Judy Mogul Dani [REDACTED] +Steve Cohen MelissaDeRosa [REDACTED]; Beth Garvey [REDACTED]; +Rich Azzopardi Maggie Moran [REDACTED]  
**Subject:** 2/26/2021 12:11:51 AM -05:00 : Lis Smith [REDACTED] -> [13 parties]  
**Attachments:** 0AB9288F-F23B-4EF3-8888-4FD027C0A319.pluginPayloadAttachment

[https://twitter.com/kaitlin\[REDACTED\]](https://twitter.com/kaitlin[REDACTED])

Message

---

**From:** Melissa DeRosa [REDACTED]  
**Sent:** 2/26/2021 11:57:03 PM  
**To:** +Peter Ajemian Lis Smith [REDACTED]; Josh Vlasto [REDACTED]; Stephanie Benton Cell [REDACTED];  
[REDACTED]; +Rich Azzopardi +Steve Cohen Maggie Moran [REDACTED] Maggie Moran [REDACTED]@kivvit.com];  
Beth Garvey [REDACTED]; +Judy Mogul Dani [REDACTED]; Jeff Pollock [REDACTED];  
+Linda Lacewell  
**Subject:** 2/26/2021 6:57:03 PM -05:00 : Melissa DeRosa [REDACTED] -> [13 parties]  
**Attachments:** [REDACTED].m4a



\*\*\*\*\*

Document produced only in native format

\*\*\*\*\*



**Moran Exhibit 15B**

Withheld

**Date:** Monday, March 1 2021 03:21 PM  
**Subject:** [Chat #37277]  
**From:** Josh Vlasto [REDACTED]  
**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];  
**Attachments:** 53638818-88BF-4BC7-A7DA-F114A40C8A6E.pluginPayloadAttachment; 03B87585-DEC3-4FEA-99D0-2CD442CFEDAB.pluginPayloadAttachment

---

<https://www.nytimes.com/2021/03/01/nyregion/charlotte-bennett-cuomo.html>

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

EXHIBIT  
16



CONFIDENTIAL TREATMENT REQUESTED  
Exempt from Disclosure Under FOIL, N. Y. Pub. Off. Law § 87(2)

NYAGB000261

Message

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**From:** Josh Vlasto [REDACTED]  
**Sent:** 2/28/2021 2:35:51 AM  
**To:** Beth Garvey [REDACTED]; Stephanie Benton Cell [REDACTED]; +Linda Lacewell +Rich Azzopardi Maggie Moran [REDACTED]@kivvit.com]; +Steve Cohen +Judy Mogul Dani [REDACTED]; Melissa DeRosa [REDACTED]; Jeff Pollock [REDACTED]; Lis Smith [REDACTED]; +Peter Ajemian Maggie Moran [REDACTED]  
**Subject:** 2/27/2021 9:35:51 PM -05:00 : Josh Vlasto [REDACTED] -> [13 parties]

Schumer spokesperson Allison Biasotti on the second Cuomo accusation: "Sen. Schumer has said many times that sexual harassment is never acceptable and must not be tolerated, and that any credible allegation should be thoroughly investigated."

EXHIBIT

17

MORAN00000575

Message

---

**From:** Melissa DeRosa [REDACTED]  
**Sent:** 2/28/2021 2:36:10 AM  
**To:** Josh Vlasto [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; Maggie Moran [REDACTED] Dani [REDACTED]  
[REDACTED]; +Peter Ajemian Jeff Pollock [REDACTED]; Stephanie Benton Cell [REDACTED]; Lis Smith  
[REDACTED]; +Linda Lacewell +Steve Cohen Beth Garvey [REDACTED]; +Rich Azzopardi +Judy Mogul  
**Subject:** 2/27/2021 9:36:10 PM -05:00 : Melissa DeRosa [REDACTED] -> [13 parties]

Good work josh

**Date:** Tuesday, March 2 2021 07:12 AM

**Subject:** [Chat #37288]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

Morning, just an update that she called me and asked me to come up. Said Lis, jef and Dani are and are staying over. I told her I can't without saying more. She didn't really push back.

----METADATA INFORMATION-----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

EXHIBIT

18

**Date:** Tuesday, March 2 2021 07:14 AM

**Subject:** [Chat #37289]

**From:** Rich Bamberger

**To:** + [redacted] [Maggie Moran]; + [redacted] [Josh Vlasto];

---

I wonder why the are putting themselves so far out there

----METADATA INFORMATION----

**Device Owner:**

+ [redacted] Bamberger, Rich

**ICCID:**

[redacted]

**Date:** Tuesday, March 2 2021 07:14 AM

**Subject:** [Chat #37290]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

I'm not sure I believe then

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]



**Date:** Tuesday, March 2 2021 07:14 AM

**Subject:** [Chat #37291]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

Her

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 2 2021 07:14 AM

**Subject:** [Chat #37291]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

Her

**----METADATA INFORMATION----**

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**EXHIBIT**

**19**

**Date:** Wednesday, March 3 2021 12:29 PM  
**Subject:** [Chat #37292]  
**From:** Maggie Moran <+ [REDACTED]>  
**To:** Rich Bamberger [REDACTED] + [REDACTED] [Josh Vlasto];

---

So what does he announce at 1? He is going to counseling?

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Wednesday, March 3 2021 12:29 PM

**Subject:** [Chat #37293]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

Beats me

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Wednesday, March 3 2021 12:29 PM

**Subject:** [Chat #37294]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

I talked to chris c this am

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Wednesday, March 3 2021 12:29 PM

**Subject:** [Chat #37295]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

And he didn't know either

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Wednesday, March 3 2021 08:44 PM

**Subject:** [Chat #37296]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

Tonight's request was for me to call the Washington post and confirm the theory that he is handsy with all his staff men and women and the men on staff see it as "fatherly"

----METADATA INFORMATION-----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Wednesday, March 3 2021 08:44 PM

**Subject:** [Chat #37297]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED]; + [REDACTED] [Maggie Moran];

---

I politely declined telling people that his old chief of staff saying he was “fatherly and he touched me” was the best way to go

----METADATA INFORMATION-----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]



**Date:** Wednesday, March 3 2021 08:45 PM

**Subject:** [Chat #37298]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

\*wasnt

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Wednesday, March 3 2021 08:47 PM

**Subject:** [Chat #37299]

**From:** Rich Bamberger

**To:** + [redacted] [Maggie Moran]; + [redacted] [Josh Vlasto];

---

Agree I don't think that would have gone over so well. Also. It looks like Gayle King is doing interview tomorrow for tomorrow night and Fri AM.

----METADATA INFORMATION----

**Device Owner:**

+ [redacted] Bamberger, Rich

**ICCID:**

[redacted]

**Date:** Wednesday, March 3 2021 08:56 PM  
**Subject:** [Chat #37300]  
**From:** Maggie Moran <+ [REDACTED]>  
**To:** Rich Bamberger [REDACTED] + [REDACTED] [Josh Vlasto];

---

Josh be careful on the text chain. Phones are better than text.

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Wednesday, March 3 2021 08:56 PM  
**Subject:** [Chat #37301]  
**From:** Josh Vlasto <+ [REDACTED]>  
**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

Yup

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Wednesday, March 3 2021 08:56 PM  
**Subject:** [Chat #37302]  
**From:** Josh Vlasto <+ [REDACTED]>  
**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

For sure

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

Message

---

**From:** Lis Smith [REDACTED]  
**Sent:** 3/5/2021 1:59:03 AM  
**To:** +Steve Cohen +Linda Lacewell Beth Garvey [REDACTED] Dani [REDACTED]; +Judy Mogul Jeff Pollock [REDACTED]; Josh Vlasto [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; Stephanie Benton Cell [REDACTED]; Maggie Moran [REDACTED] Melissa DeRosa [REDACTED]; +Rich Azzopardi +Peter Ajemian  
**Subject:** 3/4/2021 8:59:03 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

Can small group do call w him tomorrow to prep for his press call

EXHIBIT

20

MORAN00001078

Message

---

**From:** Melissa DeRosa [REDACTED]  
**Sent:** 3/5/2021 2:00:03 AM  
**To:** Beth Garvey [REDACTED]; +Rich Azzopardi Stephanie Benton Cell [REDACTED]; +Steve Cohen Dani [REDACTED]; Maggie Moran [REDACTED]; Josh Vlasto [REDACTED]; +Peter Ajemian Lis Smith [REDACTED]; Jeff Pollock [REDACTED]; +Linda Lacewell Maggie Moran [REDACTED]@kivvit.com]; +Judy Mogul [REDACTED]  
**Subject:** 3/4/2021 9:00:03 PM -05:00 : Melissa DeRosa [REDACTED] -> [13 parties]

Yes

Message

---

**From:** Melissa DeRosa [REDACTED]  
**Sent:** 3/5/2021 2:00:15 AM  
**To:** Maggie Moran [REDACTED]; +Steve Cohen; +Peter Ajemian; Josh Vlasto [REDACTED]; +Judy Mogul [REDACTED]; Jeff Pollock [REDACTED]; Dani [REDACTED]; +Linda Lacewell; +Rich Azzopardi; Beth Garvey [REDACTED]; [REDACTED] Lis Smith [REDACTED]; Stephanie Benton Cell [REDACTED]; Maggie Moran [REDACTED] [REDACTED]@kivvit.com]  
**Subject:** 3/4/2021 9:00:15 PM -05:00 : Melissa DeRosa <[REDACTED]> -> [13 parties]

Tonight or tomorrow?



Message

---

**From:** Lis Smith [REDACTED]  
**Sent:** 3/5/2021 2:01:06 AM  
**To:** +Linda Lacewell; Melissa DeRosa [REDACTED]; +Rich Azzopardi; Maggie Moran [REDACTED]; Josh Vlasto [REDACTED]; Beth Garvey [REDACTED]; +Judy Mogul; Jeff Pollock [REDACTED]; +Steve Cohen; Dani [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]; Stephanie Benton Cell [REDACTED]; +Peter Ajemian  
**Subject:** 3/4/2021 9:01:06 PM -05:00 : Lis Smith [REDACTED] -> [13 parties]

Tomorrow after cbs this morning- no idea what will be said there

**Date:** Saturday, March 6 2021 04:51 PM

**Subject:** [Chat #37328]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

Flirty and handsy but will likely force Andrea to do something

----METADATA INFORMATION-----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

EXHIBIT

21

**Date:** Saturday, March 6 2021 04:51 PM

**Subject:** [Chat #37329]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

So we are getting close again to the ring

**----METADATA INFORMATION----**

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Saturday, March 6 2021 04:51 PM

**Subject:** [Chat #37330]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

Brink

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Saturday, March 6 2021 05:04 PM

**Subject:** [Chat #37331]

**From:** Maggie Moran <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Josh Vlasto];

---

Yes and saw jimmy girl kind

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Saturday, March 6 2021 07:36 PM

**Subject:** [Chat #37333]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

All gov

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Saturday, March 6 2021 07:36 PM

**Subject:** [Chat #37334]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

Unwanted advance

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Saturday, March 6 2021 07:36 PM

**Subject:** [Chat #37335]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

Power dynamic

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]



**Date:** Saturday, March 6 2021 07:36 PM

**Subject:** [Chat #37336]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

Bully

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Saturday, March 6 2021 07:37 PM

**Subject:** [Chat #37337]

**From:** Maggie Moran <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Josh Vlasto];

---

I mean this is getting so far afield from them. He needs to say he will goto counseling. Everyone keeps laughing at me. It's his only shot at handling this.

----METADATA INFORMATION-----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

Message

---

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

EXHIBIT  
22

MORAN00001159

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

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

---

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

Steph and Melissa -

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

Sent from my iPhone

Message

---

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

Yup

Message

---

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

Wow

Message

---

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

Yeah

Message

---

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

Should I get this out there



Message

---

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

Nooooo

Message

---

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

Hold for AG

Message

---

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

For the AG

**Date:** Tuesday, March 9 2021 12:21 PM

**Subject:** [Chat #15333]

**From:** Maggie Moran <+ [REDACTED]>

**To:** "+ [REDACTED] [Joshua Vlasto (owner)]"; + [REDACTED] [Rich Bamberger];

---

Who is the new allegation from?

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**EXHIBIT**

**23**

**Date:** Tuesday, March 9 2021 12:26 PM

**Subject:** [Chat #15334]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran]; + [REDACTED] [Rich Bamberger];

---

A briefer

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 9 2021 12:26 PM

**Subject:** [Chat #15335]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran]; + [REDACTED] [Rich Bamberger];

---

I don't know the same

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 9 2021 12:27 PM

**Subject:** [Chat #15336]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran]; + [REDACTED] [Rich Bamberger];

---

But its not good. Physical, etc...

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

Chat #	From	To	Body	Timestamp: Time
32	<div data-bbox="272 258 401 338" style="background-color: black; width: 100%; height: 100%;"></div> Maggie Morran	<div data-bbox="407 258 532 338" style="background-color: black; width: 100%; height: 100%;"></div> Melissa DeRosa (owner) <div data-bbox="407 449 532 529" style="background-color: black; width: 100%; height: 100%;"></div> Melissa DeRosa (owner)	<p>I said this to u before but I will reiterate again. I think he needs to say he is going to counseling for his tendency to be aggressive and to reacclimate how he interacts with people. AG report may find no offense but will find inappropriate behavior so why not get out ahead of this now. So the pattern of all these allegations is addressed with this effort for counseling and training. I know a group in DC called mine the gap (I think that's the name) a woman I went to college with runs it <span style="background-color: black; color: black;">[REDACTED]</span>. Sorry <span style="background-color: black; color: black;">[REDACTED]</span> and I want to check in on u personally and soon. But on these other issues he needs to do something about the pattern of behavior - counseling and training is taking action to insure change - that I think is the permission for folks to focus on his positive attributes rather than the bully and inappropriate behavior.</p>	3/9/2021 12:34:13 PM(UTC-5)



**Date:** Tuesday, March 16 2021 09:45 PM

**Subject:** [Chat #100666]

**From:** Rich Bamberger

**To:** + [redacted] [Maggie Moran];

---

Someone's going after us Just killed the post with Josh - for now

----METADATA INFORMATION----

**Device Owner:**

+ [redacted] Bamberger, Rich

**ICCID:**

[redacted]

EXHIBIT  
25

**Date:** Tuesday, March 16 2021 09:54 PM

**Subject:** [Chat #100667]

**From:** Maggie Moran <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED]

---

Anything else out there tonight?

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 09:54 PM

**Subject:** [Chat #100668]

**From:** Maggie Moran <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED]

---

Same issue with post?

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 09:54 PM

**Subject:** [Chat #100669]

**From:** Rich Bamberger

**To:** + [redacted] [Maggie Moran];

---

Yes Call when can

----METADATA INFORMATION----

**Device Owner:**

+ [redacted] Bamberger, Rich

**ICCID:**

[redacted]



RB

2 People >

Wed, Mar 17, 5:51 PM

Confirmed with Ronan that rich is just called reporters to tell them to call the Govs office

Rich Bamberger

RB

K

Maggie Moran



When is story posting?

He's still fumbling with it seems

And I am doing a round with the factvchecker

So I can't imaging until tomorrow

Rich Bamberger

RB

Have them spell my name wrong

Wed, Mar 17, 7:20 PM

Confirmed it with the fact checker

Rich Bamberger

You know if the tone is that i was pushing reporters to them to get

EXHIBIT 26



iMessage





RB

2 People >

Rich Bamberger

You know if the tone is that i was pushing reporters to them to get docs - or just helping out

RB

Yes governor. I got it

Rich Bamberger

Ha.  
Sorry  
A little pushy tonight

RB



Lindsey Boylan won't cooperate with 'sham' Cuomo impeachment probe

[nypost.com](http://nypost.com)

RB

Maggie Moran

I didn't respond to Carl campinale email today. Is that what u guys



iMessage





RB

2 People >

Maggie Moran



I didn't respond to Carl campinale email today. Is that what u guys recommend? Any other word on Bernadette josh?

Nothing new from Bernadette on your end

So I think that's fine for now

Thu, Mar 18, 7:45 AM

Rich Bamberger

I keep hearing that there is a letter story coming out. I wrote a draft comment below. I'm up for comments but i would need to get truth out and separate myself from all of this:

"I had no role in writing any letter, and I did not shop around any letter. I wholeheartedly support the investigation, and believe that swift action should be taken based on any findings."

RB



iMessage





RB

2 People >

Ah, the [redacted] gambit.  
Let's discuss

Rich Bamberger

RB

Is Vielkind still pushing letter?

Maggie Moran

The any letter mention twice seems tone deaf to me as a woman. It's not any letter. It's a letter defaming a woman making an accusation. It has to be more. I support the women who have come forward and they must get a fair investigation. There have been rumors that I was personally involved in efforts to undermine one victim and they are patently false. I would engage in that, didn't have a hand in writing any content related to that and didn't circulate any information of that nature.



I wouldn't engage in that

Rich Bamberger

RB

K  
I'll tweak now



iMessage







RB

2 People >

RB

K  
I'll tweak now

Vielkind told me and the Govs press office separately that he is not writing a story on the letter

Maggie Moran

Did anyone ask u for this? And let's stay tight on this. I need to know before any quote is given anywhere. And we have to think about if u have to give a quote is what I wrote even strong enough above b



Bernadette is still kicking it around but is not mentioning you

and as best I can tell no one else is talking about it but let's see how the day goes and reaction to Ronan (if any)

Rich Bamberger

K  
No ask from anyone  
Just having a statement ready.  
And nothing goes with all approve



iMessage





RB

2 People >

Rich Bamberger

RB

K  
No ask from anyone  
Just having a statement ready.  
And nothing goes with all approve

RB

I support the women who have come forward as well as the investigation, and believe that swift action should be taken based on any findings. There have been rumors that I was personally involved in efforts to write a letter to undermine one victim, and those rumors are patently false.

Maggie Moran



Questions that come after a statement- Do you think the Governor should resign? Do you regret having worked for him? Isn't it true that you told reporters to expect a statement from the admin? So maybe you didn't write the letter but u did help them execute on their strategy right?



iMessage





RB

2 People >

Waiting the results of the investigation

No regrets

It was a weekend and I was asked to help an overwhelmed press staff point reporters to the Gov press office for a statement. I didn't release anything.

I never shopped around any materials. (I did give to one person who proactively reached out to me wanting to get her experience out)

RB

On last - it went no where but she did talk to reporters on her own with positive experiences prior to coming to me

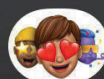
RB

Maggie Moran

Did you know they were handing out a hit job letter on Lindsay? U did this once before with the gov on liz Benjamin right? (I know this is a cheap shot but they love



iMessage





RB

2 People >

Maggie Moran

Did you know they were handing out a hit job letter on Lindsay? U did this once before with the gov on liz Benjamin right? (I know this is a cheap shot but they love trying to show patterns of behavior cuomo people at it again if they disagree with you they try and take u down)



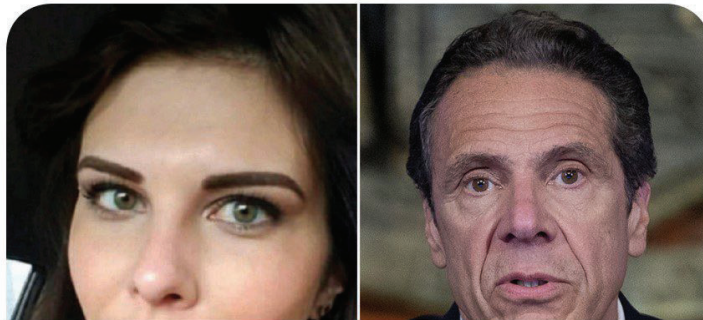
Rich Bamberger

I did not know specifics of statement and did not see statement.

Good Q - Josh mentioned yesterday: The Liz thing was solely notes about content of stories. It was my job to debate content.

RB

Thu, Mar 18, 10:45 AM



iMessage



6:07



RB

2 People >

Thu, Mar 18, 10:45 AM



**Reporter details 'uncomfortable' encounters with Gov. Cuomo**

[nypost.com](http://nypost.com)



**Women Reporters Faced Cuomo's Creepy Behavior, Too**

[thedailybeast.com](http://thedailybeast.com)

Thu, Mar 18, 4:17 PM

Talked to Ronan. Nothing new on



iMessage



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Exempt from Disclosure Under FOIL, N. Y. Pub. Off. Law § 87(2)

NYAGV000054



RB

2 People >

Talked to Ronan. Nothing new on any front. Can't see the story running today.

Rich Bamberger

RB

Running tonight

Thu, Mar 18, 10:01 PM

Ronan going live shortlt

He's on gma tomorrow



**Cuomo's First Accuser Raises New Claims of Harassment and Retaliation**

newyorker.com

Maggie Moran

Did he tell u the firm would be in the story? Let's watch Twitter and see if we now start getting



iMessage





RB

2 People >

Maggie Moran

Did he tell u the firm would be in the story? Let's watch Twitter and see if we now start getting stalked ... and pls keep me posted on the reporters who didn't report rich's name and their reaction.



Rich it doesn't say that u didn't know what they were circulating



On the other line will call u back



Can u get the line fixed to create more clarity or no it's over?

he didnt

Maggie Moran



He didn't what?

Say he was mentioning the firm

Maggie Moran

Well it really fucking sucks. Rich I need to clear my head. I will call you back in the morning. [REDACTED] will monitor our staff. And she will



iMessage





RB

2 People >

Maggie Moran



He didn't what?

Say he was mentioning the firm

Maggie Moran

Well it really fucking sucks. Rich I need to clear my head. I will call you back in the morning. [REDACTED] will monitor our staff. And she will make sure it's not in our internal clips. Let's see how badly we start getting trolled by activists ... and if Kivvit gets mentioned on GMA tomorrow morning I will lose my mind. So if there is a way to avoid that let's try and get that done.



Thu, Mar 18, 11:48 PM

Maggie Moran

[REDACTED] is setting up trackers on mention of rich and Kivvit on social tomorrow. And we can use some tools to see how far the reach of article is and maybe even any focus on us.



iMessage





**Date:** Thursday, March 18 2021 09:44 AM

**Subject:** [Chat #66884]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran];

---

Morning! Let me know if you have two mins this am. Nothing urgent or problematic. Just want to give an update on a few fronts.

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

EXHIBIT

27

**Date:** Thursday, March 18 2021 02:30 PM

**Subject:** [Chat #66885]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran];

---

Ronan story still a moving target but most likely not until tomorrow it seems.

**----METADATA INFORMATION----**

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Thursday, March 18 2021 02:31 PM

**Subject:** [Chat #66886]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran];

---

Fact checker calling him shortly to close the loop.

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Thursday, March 18 2021 04:18 PM  
**Subject:** [Chat #66887]  
**From:** Maggie Moran <[REDACTED]>  
**To:** "+[REDACTED] [Joshua Vlasto (owner)]";

---

His instincts are bad right now we need to protect him from himself and for the firm. If u want me to explain give me a call.

----METADATA INFORMATION-----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

Message

**From:** Maggie Moran [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2805C61DA550463DB5E5679E7960C576-MMORAN]  
**Sent:** 3/21/2021 1:25:34 PM  
**To:** Josh Vlasto [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0b9be6dd25534ee6b3af433af7af3629-jvlasto]  
**CC:** [REDACTED] [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=da0b54159fb841b1b0e9e44c538f24df-[REDACTED] Richard Bamberger [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=ef09293cb56b44e58225c2f3c7e08775-rbamberger]  
**Subject:** Re: Social Media Monitoring

It's not the first time I've been in crosshairs so I'm clear about how it works but just got turned down for a board seat last night because of it. "Too much heat on cuomo and all the cuomo people around it". Let's continue to monitor and most importantly track of true women's activists pick it up ... any reporters still on this?

On Mar 21, 2021, at 9:17 AM, Josh Vlasto [REDACTED]@kivvit.com> wrote:

[REDACTED] just sent earlier

Lindsey send hundreds of tweets a day and took similar shots at me a few weeks ago off the NYT. She attacks anyone and everyone all day long. They don't get any attention unless they are at the gov or if people respond. We should not engage in any way.

[Get Outlook for iOS](#)

---

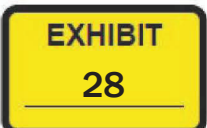
**From:** [REDACTED]@kivvit.com>  
**Sent:** Sunday, March 21, 2021 9:08:00 AM  
**To:** Maggie Moran [REDACTED]@kivvit.com>; Richard Bamberger [REDACTED]@kivvit.com>  
**Cc:** Josh Vlasto [REDACTED]@kivvit.com>  
**Subject:** Re: Social Media Monitoring

Making sure you're seeing this:

<https://twitter.com/lindseyboylan/status/1373619617625735171?s=21>

---

**From:** Maggie Moran [REDACTED]@kivvit.com>  
**Date:** Friday, March 19, 2021 at 10:59 AM  
**To:** Richard Bamberger [REDACTED]@kivvit.com>  
**Cc:** [REDACTED]@kivvit.com>, Josh Vlasto [REDACTED]@kivvit.com>  
**Subject:** Re: Social Media Monitoring



Well his bio is complete anti wealth and anti corporate so it makes sense which clients he listed.

On Mar 19, 2021, at 10:58 AM, Richard Bamberger [REDACTED]@kivvit.com> wrote:

No idea  
Just saw that too  
He's anti fossil fuel guy

Sent from my iPhone

On Mar 19, 2021, at 10:55 AM, [REDACTED]  
[REDACTED]@kivvit.com> wrote:

Starting this chain to keep everyone updated. We set up monitors to get notifications in real time on social media – there has not been a lot, but wanted to flag the tweet below.

The alerts are for anything mentioning or tagging Kivvit, Rich, Maggie or Josh.

[https://twitter.com/\[REDACTED\]](https://twitter.com/[REDACTED])

[REDACTED]

<image001.png>

--

[REDACTED]  
Chief Operating Officer

**NEW YORK**  
200 Varick Street, Suite 201  
New York, NY 10014  
c: [REDACTED]  
o: [REDACTED]

<image002.png>

[KIVVIT.COM](http://KIVVIT.COM) | [TWITTER](https://twitter.com/kivvit) | [FACEBOOK](https://www.facebook.com/kivvit)

**Date:** Friday, March 19 2021 11:02 AM

**Subject:** [Chat #100677]

**From:** Maggie Moran <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED]

---

[REDACTED] is on the phone with [REDACTED] about the article. He saw it. I didn't share it. I'm waiting for him to call me or you. I should have suggested u call him last night.

----METADATA INFORMATION-----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]



**Date:** Friday, March 19 2021 11:02 AM

**Subject:** [Chat #100678]

**From:** Maggie Moran <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED]

---

I didn't think of it. And didn't want to put him in this loop.

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]



**Date:** Friday, March 19 2021 11:02 AM

**Subject:** [Chat #100679]

**From:** Maggie Moran <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED]

---

Wanted to give u a heads up in case he calls u.

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Friday, March 19 2021 11:04 AM

**Subject:** [Chat #100680]

**From:** Rich Bamberger

**To:** + [redacted] [Maggie Moran];

---

Ok

----METADATA INFORMATION----

**Device Owner:**

+ [redacted] Bamberger, Rich

**ICCID:**

[redacted]

**Date:** Friday, March 19 2021 11:04 AM

**Subject:** [Chat #100681]

**From:** Rich Bamberger

**To:** + [redacted] [Maggie Moran];

---

She should tell him that i called all staff last night

----METADATA INFORMATION----

**Device Owner:**

+ [redacted] Bamberger, Rich

**ICCID:**

[redacted]

**Date:** Friday, March 19 2021 11:04 AM

**Subject:** [Chat #100682]

**From:** Maggie Moran <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED]

---

She is

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Friday, March 19 2021 11:10 AM

**Subject:** [Chat #100683]

**From:** Maggie Moran <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED]

---

[REDACTED] said he was actually good and wanted talking points on what to say to MD's. You should call him it's the right thing to do. Same convo as u had with staff. Tight and short.

----METADATA INFORMATION-----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Friday, March 19 2021 11:10 AM

**Subject:** [Chat #100684]

**From:** Maggie Moran <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED]

---

It's my bad I wanted to keep away from him entirely that was short sighted. I should have had u call him last night

----METADATA INFORMATION-----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Friday, March 19 2021 11:11 AM

**Subject:** [Chat #100685]

**From:** Rich Bamberger

**To:** + [redacted] [Maggie Moran];

---

I'll call ASAP Right after this call

----METADATA INFORMATION----

**Device Owner:**

+ [redacted] Bamberger, Rich

**ICCID:**

[redacted]

**Date:** Friday, March 19 2021 11:54 AM

**Subject:** [Chat #100689]

**From:** Rich Bamberger

**To:** + [redacted] [Maggie Moran];

---

Called All good

----METADATA INFORMATION----

**Device Owner:**

+ [redacted] Bamberger, Rich

**ICCID:**

[redacted]



Message

---

**From:** Maggie Moran [REDACTED]  
**Sent:** 3/16/2021 6:27:33 PM  
**To:** Maggie Moran [REDACTED]@kivvit.com]; Governor Cuomo [REDACTED]  
**Subject:** 3/16/2021 2:27:33 PM -04:00 : Maggie Moran [REDACTED] -> [Maggie Moran [REDACTED]@kivvit.com]; Governor Cuomo [REDACTED]

Tried you back. Josh feels he can't do. with [REDACTED] etc he knows what you will need and can't be 24-7. Obviously you have a long term relationship and you are more than welcome to speak with him. But I walked him thru what we discussed and he was a no.

EXHIBIT  
30

MORAN00002201

Message

---

**From:** Governor Cuomo [REDACTED]  
**Sent:** 3/16/2021 6:29:04 PM  
**To:** Maggie Moran [REDACTED]; Maggie Moran [REDACTED]@kivvit.com]  
**Subject:** 3/16/2021 2:29:04 PM -04:00 : Governor Cuomo [REDACTED] -> [Maggie Moran [REDACTED] Maggie Moran [REDACTED]@kivvit.com>]

Ur firm won't do it? Will he volunteer to help? Do u know a goof p r guy to recommend?



**Date:** Tuesday, March 16 2021 04:28 PM  
**Subject:** [Chat #37482]  
**From:** Maggie Moran <+ [REDACTED]>  
**To:** Rich Bamberger [REDACTED] + [REDACTED] [Josh Vlasto];

---

I agreed to take a call for Melissa from city and state Zach williams. I was merely going to say in my work with Melissa she was brilliant driven relentless person.

----METADATA INFORMATION-----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

EXHIBIT  
32

**Date:** Tuesday, March 16 2021 04:29 PM

**Subject:** [Chat #37484]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

I did to and there is a politico story coming too

----METADATA INFORMATION-----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 04:29 PM

**Subject:** [Chat #37485]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

I haven't called city and state back yet

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 04:30 PM

**Subject:** [Chat #37486]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

the whole thing is mess

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 04:30 PM

**Subject:** [Chat #37487]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

I think thats a safe place to go

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 04:31 PM

**Subject:** [Chat #37488]

**From:** Rich Bamberger

**To:** + [redacted] [Maggie Moran]; + [redacted] [Josh Vlasto];

---

Not a surprise but Got a heads up from Politico that several folks are doing stories of who is helping . Someone is doing this on overdrive

----METADATA INFORMATION-----

**Device Owner:**

+ [redacted] Bamberger, Rich

**ICCID:**

[redacted]



**Date:** Tuesday, March 16 2021 05:47 PM

**Subject:** [Chat #37490]

**From:** Rich Bamberger >

**To:** + [redacted] [Maggie Moran]; + [redacted] [Josh Vlasto];

---

Talked to Jesse Between Josh's calls and Haberman hearing that her source was wrong- i am out of the Times article They will not say i did something that i did not do

----METADATA INFORMATION----

**Device Owner:**

+ [redacted] Bamberger, Rich

**ICCID:**

[redacted]

**Date:** Tuesday, March 16 2021 06:28 PM

**Subject:** [Chat #37492]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

If ronan shoots and misses, gov will survive to the investigation without having committed not to run for election

----METADATA INFORMATION-----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 06:28 PM

**Subject:** [Chat #37493]

**From:** Rich Bamberger

**To:** + [redacted] [Maggie Moran]; + [redacted] [Josh Vlasto];

---

That's exactly what Jesse said

----METADATA INFORMATION----

**Device Owner:**

+ [redacted] Bamberger, Rich

**ICCID:**

[redacted]

**Date:** Tuesday, March 16 2021 06:29 PM

**Subject:** [Chat #37494]

**From:** Rich Bamberger

**To:** + [redacted] [Maggie Moran]; + [redacted] [Josh Vlasto];

---

Jesse thinks he'll run And he says times is ready to put much talent on that race

----METADATA INFORMATION----

**Device Owner:**

+ [redacted] Bamberger, Rich

**ICCID:**

[redacted]

**Date:** Tuesday, March 16 2021 09:02 PM

**Subject:** [Chat #37496]

**From:** Maggie Moran <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Josh Vlasto];

---

Trying to [REDACTED] and missed a call from gov. Anyone have any idea what that's about?

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 09:27 PM

**Subject:** [Chat #37497]

**From:** Josh Vlasto <+ [REDACTED]>

**To:** Rich Bamberger [REDACTED] + [REDACTED] [Maggie Moran];

---

Something is up

----METADATA INFORMATION----

**Device Owner:**

+ [REDACTED] Bamberger, Rich

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 10:06 AM

**Subject:** [Chat #15420]

**From:** Maggie Moran <+ [REDACTED]>

**To:** "+ [REDACTED] [Joshua Vlasto (owner)]; + [REDACTED] [Rich Bamberger];

---

Josh - he just called. I'm on a board meeting so didn't take it. Anything new after your convo with Melissa? I assume he is going to push me to push you. Which i won't do. And will tell him that.

----METADATA INFORMATION-----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

EXHIBIT  
33

**Date:** Tuesday, March 16 2021 10:17 AM

**Subject:** [Chat #15421]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran]; + [REDACTED] [Rich Bamberger];

---

Crickets. She called this am and I called back but haven't heard back.

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]



**Date:** Tuesday, March 16 2021 10:18 AM

**Subject:** [Chat #15422]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran]; + [REDACTED] [Rich Bamberger];

---

She and i last spoke Sunday evening

----METADATA INFORMATION-----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 10:22 AM

**Subject:** [Chat #15423]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran]; + [REDACTED] [Rich Bamberger];

---

[REDACTED] just called too

----METADATA INFORMATION-----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 10:22 AM

**Subject:** [Chat #15424]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran]; + [REDACTED] [Rich Bamberger];

---

This is ridicu

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 10:22 AM

**Subject:** [Chat #15425]

**From:** Maggie Moran <+ [REDACTED]>

**To:** "+ [REDACTED] [Joshua Vlasto (owner)]"; + [REDACTED] [Rich Bamberger];

---

So the call is likely about u and pushing u. What did u say to [REDACTED]?

----METADATA INFORMATION-----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 10:22 AM

**Subject:** [Chat #15426]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran]; + [REDACTED] [Rich Bamberger];

---

didnt take the call

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 10:22 AM

**Subject:** [Chat #15427]

**From:** Maggie Moran <+ [REDACTED]>

**To:** "+ [REDACTED] [Joshua Vlasto (owner)]"; + [REDACTED] [Rich Bamberger];

---

K

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 10:22 AM

**Subject:** [Chat #15428]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran]; + [REDACTED] [Rich Bamberger];

Redacted in original production

I have a [REDACTED] zoom in 8 mins

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 10:22 AM

**Subject:** [Chat #15429]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran]; + [REDACTED] [Rich Bamberger];

---

These folks can wait

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]



**Date:** Tuesday, March 16 2021 10:23 AM

**Subject:** [Chat #15430]

**From:** Maggie Moran <+ [REDACTED]>

**To:** "+ [REDACTED] [Joshua Vlasto (owner)]; + [REDACTED] [Rich Bamberger];

---

Yes. I'm on a board call and presenting in a few mins so I didn't take his call. Which I know must drive him crazy but is what it is.

----METADATA INFORMATION-----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 10:23 AM

**Subject:** [Chat #15431]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran]; + [REDACTED] [Rich Bamberger];

---

Steve told me this morning they are asking him to spread oppo on Joon Kim. Don't think we want to be getting down with that crowd

----METADATA INFORMATION-----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 10:25 AM

**Subject:** [Chat #15432]

**From:** Maggie Moran <+ [REDACTED]>

**To:** "+ [REDACTED] [Joshua Vlasto (owner)]; + [REDACTED] [Rich Bamberger];

---

I will just say I'm not forcing you into anything. That you are essential here manage many important clients and [REDACTED] and have served ur time. That we are all happy to volunteer privately but this doesn't work. Unless you want me to say less?

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 10:33 AM

**Subject:** [Chat #15433]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran]; + [REDACTED] [Rich Bamberger];

---

Totally up to you but I like that riff

----METADATA INFORMATION-----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 10:33 AM

**Subject:** [Chat #15434]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran]; + [REDACTED] [Rich Bamberger];

---

And will use it regardle

**----METADATA INFORMATION----**

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 12:32 PM

**Subject:** [Chat #15444]

**From:** Maggie Moran <+ [REDACTED]>

**To:** "+ [REDACTED] [Joshua Vlasto (owner)]"; + [REDACTED] [Rich Bamberger];

---

Josh did Gov ever respond to ur call Sunday night?

----METADATA INFORMATION-----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 12:46 PM

**Subject:** [Chat #15445]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran]; + [REDACTED] [Rich Bamberger];

---

I only spoke to him the one time when I told him no. He never called about the 100k thing.

----METADATA INFORMATION-----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 12:47 PM

**Subject:** [Chat #15446]

**From:** Maggie Moran <+ [REDACTED]>

**To:** "+ [REDACTED] [Joshua Vlasto (owner)]"; + [REDACTED] [Rich Bamberger];

---

K

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]



**Date:** Tuesday, March 16 2021 02:28 PM

**Subject:** [Chat #15447]

**From:** Maggie Moran <+ [REDACTED]>

**To:** "+ [REDACTED] [Joshua Vlasto (owner)]"; + [REDACTED] [Rich Bamberger];

---

I called and texted him back FYI. Said with [REDACTED] he doesn't feel he can do this cause he is gonna need 24-7 etc.

----METADATA INFORMATION-----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 02:28 PM

**Subject:** [Chat #15448]

**From:** Maggie Moran <+ [REDACTED]>

**To:** "+ [REDACTED] [Joshua Vlasto (owner)]"; + [REDACTED] [Rich Bamberger];

---

I'll let u know if he calls again. Pls let me know if he calls u and how that goes.

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 02:30 PM

**Subject:** [Chat #15449]

**From:** Maggie Moran <+ [REDACTED]>

**To:** "+ [REDACTED] [Joshua Vlasto (owner)]; + [REDACTED] [Rich Bamberger];

---

He sent back a note saying ur firm won't do and I said no. Who else could do. So now we need to get him names. He said he still wants volunteer time.

----METADATA INFORMATION-----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 03:56 PM

**Subject:** [Chat #15450]

**From:** Joshua Vlasto <+ [REDACTED]>

**To:** + [REDACTED] [Maggie Moran]; + [REDACTED] [Rich Bamberger];

---

Liz says gov asked her to be the spokesperson

----METADATA INFORMATION-----

**Device Owner:**

[REDACTED] Josh Vlasto

**ICCID:**

[REDACTED]

**Date:** Tuesday, March 16 2021 03:56 PM

**Subject:** [Chat #15451]

**From:** Maggie Moran <+ [REDACTED]>

**To:** "+ [REDACTED] [Joshua Vlasto (owner)]"; + [REDACTED] [Rich Bamberger];

---

Yes he and I discussed Lis. What did she say? He asked if I knew if she finished her book.

----METADATA INFORMATION----

**Device Owner:**

[REDACTED] Josh Vlasto

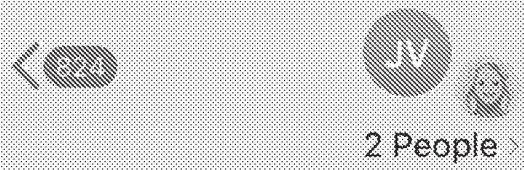
**ICCID:**

[REDACTED]

**Date:** Thursday, March 25 2021 03:18 PM  
**Subject:** Screenshot 2021-03-25 at 3.18.17 PM  
**From:** Rich Bamberger  
**To:** Rich Bamberger  
**Attachments:** Screenshot 2021-03-25 at 3.18.17 PM.png; ATT00002.txt; Screenshot 2021-03-25 at 3.18.17 PM.png; ATT00004.txt

---





Maggie Moran


They will be incapacitated

 This is the bough breaking.

Josh Vlasto

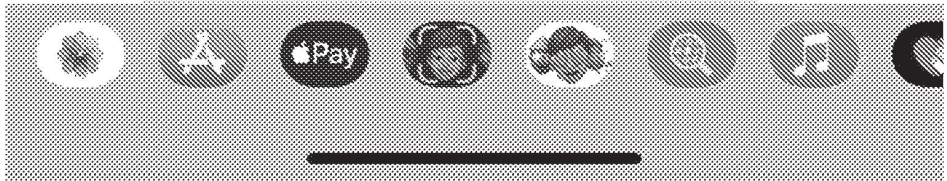
 In deed

Maggie Moran

 So time for what? I told Melissa the only thing I can think of last week or week before / Losing track of time / is for him to admit he has let his position get to him and needs counseling to become a better man and better governor to stop with aggressive and inappropriate behavior. And to actually do that.

Josh Vlasto

BREAKING/NEW:  
@CarlHeastie









Sent from my iPhone

**Date:** Thursday, March 25 2021 03:17 PM  
**Subject:** Screenshot 2021-03-25 at 3.17.06 PM  
**From:** Rich Bamberger  
**To:** Rich Bamberger ;  
**Attachments:** Screenshot 2021-03-25 at 3.17.06 PM.png; ATT00002.txt; Screenshot 2021-03-25 at 3.17.06 PM.png; ATT00004.txt

---

3:17

LTE

NYTIMES

now

### Politics Live Update

Biden expects to run for re-election in 2024, and says 'I have no idea whether th...

Doesn't say who. Isn't that odd or is it because person works in the office now?

Josh Vlasto

Still works there

Maggie Moran

Ah. Got it.

I texted Melissa it's time to do counseling and training and announce and then have Baptist and Pentecostal ministers pray on amc. Have u seen this? Know what I'm referring to? Forgiveness in the base is powerful. And keeping the base is powerful. The second part I didn't mention.

Josh Vlasto

This is beyond repair



iMessage

