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IN THE MATTER OF INDEPENDENT  
INVESTIGATION UNDER EXECUTIVE  
LAW 63(8)  
-----X

VIRTUAL ZOOM INVESTIGATION

June 9, 2021

9:58 a.m.

TESTIMONY OF VIRGINIA LIMMIATIS,  
remotely held at the above time and place,  
taken before Melissa Gilmore, a Stenographic  
Reporter and Notary Public of the State of New  
York, pursuant to stipulations between Counsel.

Job No. NY4616233

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A P P E A R A N C E S: (Cont'd)

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ALSO PRESENT:

RYAN GALLAGHER, Videographer

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P R O C E E D I N G S

THE VIDEOGRAPHER: We are now going on the record at approximately 9:58 a.m. Today's date is June 9, 2021.

This is media unit number 1 of the video recorded interview of witness for June 9, 2021, taken by special deputy for the New York Attorney General's Office in the matter of Independent Investigation Under New York State Executive Law Section 63(8).

This deposition is being held via Zoom virtual conferencing. My name is Ryan Gallagher. I'm the videographer. The court reporter is Melissa Gilmore. We're both from the firm Veritext Legal Solutions.

At this time, all attorneys present will identify themselves for the record.

MS. CLARK: Hi. I'm Anne Clark. I'm usually at the law firm of Vladeck, Raskin & Clark. I'm appearing today as a special deputy to the first deputy attorney general. Ezra?

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LIMMIATIS

MR. CUKOR: My name is Ezra Cukor,  
and I am also from the law firm of  
Vladeck, Raskin & Clark.

MS. WANG: And I am Mariann Wang  
from Cuti Hecker Wang, representing  
Virginia Limmiatis, the witness today.  
Alice?

MS. REITER: I'm Alice Reiter, also  
from Cuti Hecker Wang, on behalf of  
Mrs. -- Ms. Limmiatis.

MR. KIM: Good morning. This is  
Joon Kim, I just joined, with the law firm  
of Cleary Gottlieb, and like Ms. Clark, am  
acting in my capacity as a special deputy  
of the New York Attorney General's Office.

THE VIDEOGRAPHER: At this time, the  
court reporter will swear in the witness  
and we can proceed.

V I R G I N I A L I M M I A T I S ,

called as a witness, having been duly  
placed under oath by a Notary Public, was  
examined and testified as follows:

EXAMINATION BY

MS. CLARK:

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LIMMIATIS

Q. Good morning, Ms. Limmiatis. Thank you very much for coming forward and agreeing to meet with us today.

I just have to go over some sort of background stuff before we get started.

As we said at the outset, my name is Anne Clark, and I've been appointed a deputy to the first deputy attorney general.

The New York Attorney General has appointed two law firms, mine, Vladeck, Raskin & Clark, and Joon Kim's, Cleary, Gottlieb Steen & Hamilton, to conduct an independent investigation under New York Executive Law Section 63(8) into allegations of sexual harassment brought against Governor Andrew Cuomo, as well as the surrounding circumstances.

And you are here today pursuant to a subpoena that was issued in connection with that investigation.

As you are not somebody who has gone forward publicly, we will do our best to maintain confidentiality. We are conducting a confidential investigation.

## LIMMIATIS

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2           If we use information supplied by  
3 you, there will be a public report at the end  
4 of our investigation, but if, at the time we  
5 issue a report, you have still chosen not to  
6 step forward publicly, we have the ability to  
7 not use your name and to anonymize you so that  
8 the public won't know who it is.

9           That being said, you know, while the  
10 Attorney General's Office does aim to protect  
11 complainants who have not chosen to come  
12 forward publicly, the state is subject to  
13 Freedom of Information law and, you know, if  
14 there's litigation over that, no one can really  
15 control the outcome, although the Attorney  
16 General's Office has generally been successful  
17 in protecting that information.

18           I want to let you know that you  
19 should be protected from retaliation for  
20 participating in this. So if anything happens  
21 to you after today that you think is  
22 retaliation for you participating in the  
23 investigation, you should let your attorneys  
24 know and they will let us know right away  
25 because this is something that the Attorney

1 LIMMIATIS

2 General's Office takes very seriously.

3 A. Okay.

4 Q. I want to note that, as you saw at  
5 the outset, this is being video recorded, and  
6 also note that you are under oath, which means  
7 you must testify truthfully just as if you were  
8 in a court of law sitting before a judge and  
9 jury. And your testimony is subject to penalty  
10 of perjury if you're not truthful.

11 At the end -- I will remind you  
12 again at the end, if you want to make any brief  
13 sworn statement, if there's anything that we  
14 didn't cover, anything you want to add, you  
15 will be permitted to make any statement you  
16 want at the conclusion.

17 We also have to tell you that,  
18 although this is a civil investigation, that  
19 the Attorney General's Office also has criminal  
20 enforcement powers. So you have the right to  
21 refuse to answer a question if to do so would  
22 incriminate you. Failure to answer a question  
23 can be held against you in civil proceedings,  
24 but not in criminal proceedings.

25 And if you have questions about that



1 LIMMIATIS

2 during the course of the proceedings, you can  
3 speak to your counsel about that.

4 You do have counsel present today.  
5 You can consult with them about any sort of  
6 privilege issue that may come up, whether it's  
7 Fifth Amendment or attorney/client  
8 communication.

9 As you see, we have a court reporter  
10 who is present in our virtual space here, and  
11 she needs to be able to take down everything  
12 we're saying to create a clear record. And so  
13 that it's clear and that her job is not made  
14 more difficult, a few ground rules.

15 One is it's best if we do not speak  
16 at the same time. So I will do my very best to  
17 make sure you have finished answering before I  
18 start talking and asking the next question, and  
19 this is not like a normal conversation, but  
20 even if you know where I'm headed with my  
21 question, let me get the whole question out,  
22 because if you start before I'm done, it makes  
23 the court reporter's job difficult.

24 In giving a response, even though  
25 there's a video, we still have the court

## LIMMIATIS

1  
2 reporter taking down a record. So nodding your  
3 head or shaking your head or saying uh-huh does  
4 not create a clear record. So if you do that,  
5 I'll ask you to give a verbal response.

6 If you don't know the answer to a  
7 question, just let me know. If you don't  
8 understand one of my questions, don't struggle  
9 or guess. Just let me know that, you know,  
10 whatever I said wasn't clear to you, and I will  
11 try to rephrase it in a way that makes sense.

12 Now, you are not going to have a  
13 chance to get a copy of this transcript to  
14 review it, but during the course of the day, if  
15 while we're talking, you realize that you need  
16 to add something or clarify something or change  
17 something you said earlier, sometimes when you  
18 start talking about a later incident, you  
19 remember something about something earlier.  
20 Feel free to just let us know that you need to  
21 add or change something from a prior answer and  
22 we can put that on the record.

23 We shouldn't go too, too long today,  
24 but if at any point you need a break, just let  
25 us know. I'd ask that you answer any pending

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LIMMIATIS

question before we take a break, but otherwise we can take breaks.

So, Ms. Limmiatis, are you alone in the room that you're in or are you in a room with anybody else?

A. I'm alone.

Q. Okay.

MS. CLARK: And Mariann and Alice, are you guys both alone in the rooms you're in?

MS. WANG: I will be alone in one second, but in any event, no one can hear me.

MR. REITER: Yes, I'm alone.

MS. CLARK: Okay.

Q. And we just want to confirm that you and your counsel are not permitted to use any technology to create a recording of the proceeding, including screen capturing tools.

Is that understood?

MS. WANG: That's confirmed on our end.

MS. REITER: Yes.

Q. And that we also need to confirm

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LIMMIATIS

that you and your counsel are not allowed to let anyone else listen in on these proceedings.

Is that confirmed?

MS. WANG: That's also confirmed, yes.

Q. And we're just going to direct that, during the course of the proceedings today, that you not, during any breaks or through text messages or anything, give sort of realtime updates to anyone as to what's going on.

And we need to tell you that Executive Law Section 63(8), the provision under which we're conducting this investigation, prohibits you and your counsel from telling anyone about what you testified to today and the questions that we ask you.

So, you know, you're free, if you want, to tell people that you participated in this, but not the substance of what we discussed. And if you or your counsel have questions about that later, we can certainly answer any questions.

Are you taking any medication that might affect your ability to testify accurately

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LIMMIATIS

and truthfully today?

A. No, I'm not.

Q. Is there any other reason why you couldn't -- why you can't testify accurately and truthfully today?

A. No.

Q. Have you had any alcohol today?

A. No.

Q. Could you, for the record, state your name, date of birth and current home and business addresses?

A. Yes. My name is Virginia Limmiatis. My birthday [REDACTED]. I live at [REDACTED].

Q. And what's your work address?

A. [REDACTED]

Q. Have you ever given testimony in any other proceeding before?

A. No, I have not.

Q. Other than speaking with your counsel, and I don't want to know about that, did you do anything to prepare for testimony today?

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LIMMIATIS

A. No.

Q. Did you speak to anyone other than your counsel in anticipation of your testimony today?

A. No, I did not.

Q. And we have so few documents that we didn't bother sending a binder as we've done in some other things.

MS. CLARK: But, Ezra, could you put on the screen tab 1?

(Exhibit 1, Subpoena, marked for identification.)

Q. And what I'm showing you is a subpoena that was sent to you care of your attorney.

Did you see that before?

A. Yes, I did.

Q. And you understand that --

MS. CLARK: Ezra, you can take that down.

Q. -- that the testimony that we're taking today is pursuant to this subpoena; is that right?

A. That's correct.

LIMMIATIS

1  
2 Q. I just want a little bit of sense of  
3 your background.

4 If you could just describe your  
5 educational background for us.

6 A. Yes, I have both a baccalaureate  
7 degree and master's degree from the University  
8 of Scranton in international relations and  
9 communications, and my master's degree is in  
10 American history.

11 Q. And when did you get your degrees?

12 A. Respectively, in [REDACTED].

13 Q. And you currently work at [REDACTED]

14 [REDACTED]?

15 A. That's correct.

16 Q. When did you start at [REDACTED]?

17 A. In 2010.

18 Q. And if you can give us an overview  
19 of what your employment history was from the  
20 time you got your degrees until you joined

21 [REDACTED].

22 A. Sure. So, basically, I worked in  
23 the capacity of communications for various  
24 organizations in the Washington, DC area that  
25 include law firms as well as engineering firms.

LIMMIATIS

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2                   When I moved, [REDACTED] I moved  
3 [REDACTED] to Syracuse in about 2000, I  
4 worked for a few years as a consultant, and  
5 then I joined the [REDACTED]  
6 [REDACTED] in 2007, I  
7 believe, and worked there for about two years.

8                   And then I worked in the capacity of  
9 communications for the [REDACTED]  
10 [REDACTED], which preceded my joining [REDACTED]  
11 [REDACTED] in 2010.

12                Q.       When you joined [REDACTED], what  
13 was your first position?

14                A.       It's the position that I've held  
15 since 2010. I work in strategic  
16 communications.

17                Q.       And why don't you explain a little  
18 bit to us about what you do in your role in  
19 strategic communications.

20                A.       Sure. So I work on crisis  
21 communications. I work in media outreach. I  
22 develop holding statements, talking points.  
23 I'm considered an asset as an advisor to our  
24 executive leadership. So I work on strategic  
25 communication that would basically entail



LIMMIATIS

1  
2 looking at opportunities to convey messaging on  
3 behalf of the company. So both external-facing  
4 communications and internal communications. So  
5 I do a lot of writing, promoting of the  
6 programs that [REDACTED] is making available  
7 to organizations and to customers and looking  
8 at short-term and long-term objectives to make  
9 sure that storytelling is conveyed accurately.

10 So I work in capacity as well as a  
11 public information officer on behalf of the  
12 company during storms and crisis  
13 communications. So, in general, what I do is  
14 both external and internal communications on  
15 behalf of the company.

16 Q. And who do you presently report to?

17 A. So, presently, I report to [REDACTED]

18 [REDACTED]. She's the [REDACTED]

19 [REDACTED].

20 Q. And as part of your work with  
21 [REDACTED], do you interact at all with  
22 anyone in the Cuomo administration?

23 A. No, I do not.

24 Q. Outside of your work at [REDACTED]

25 [REDACTED], do you have any connections to Governor

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Cuomo or his administration?

A. No, I don't.

Q. Have you ever worked for Andrew Cuomo?

A. No, I have not.

Q. Have you ever worked for the Cuomo administration?

A. No, I have not.

Q. And have you ever worked for or with anyone that you understand to be a senior person in his administration?

A. No.

Q. And have you ever worked for the State of New York?

A. No, I have not.

Q. Okay. So we understand we're here today because you had an interaction at some point with the governor.

When was that event?

A. It was May [REDACTED], nineteen seven -- excuse me -- 2017.

Q. And what was the event?

A. It was a celebration in recognition of a formal process to recognize [REDACTED]

## LIMMIATIS

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2 [REDACTED] transfer of about 3,000 acres of land at  
3 the Salmon River. So, formally, the agreement  
4 was referred to as the Salmon River Land  
5 Transfer.

6 So we were working with the folks in  
7 the -- call it the DEC, who manages the Salmon  
8 River to put together a recognition of [REDACTED]  
9 [REDACTED] transfer of the 3,000 acres to the State  
10 of New York.

11 So this was the culmination of  
12 months and years of work and dedication of many  
13 people at [REDACTED] to ensure that the  
14 agreement was signed, sealed and delivered and  
15 it was basically as a way to recognize the  
16 years of collaboration between [REDACTED]  
17 and the state to ensure that the land transfer  
18 was publicly celebrated in the form of this  
19 media event at the Salmon River.

20 Q. And what was your role, if any, in  
21 preparing for the event?

22 A. So in my capacity working in  
23 communications, I worked with members of the  
24 DEC to ensure putting together messaging in the  
25 form of a press release and putting together

LIMMIATIS

1  
2 our subject matter experts to both attend the  
3 event. And if asked, we would be able to put a  
4 member of the group of subject matter experts  
5 in front of a camera to talk on behalf of  
6 [REDACTED] to ensure that that messaging was  
7 delivered to members of the media.

8 Q. And DEC, what does that stand for?

9 A. The Department of Environmental  
10 Conservation.

11 Q. And who were you working with from  
12 DEC on working on the messaging and putting the  
13 event together?

14 A. I don't recall.

15 Q. And where was the event held?

16 A. At the Salmon River Fish Hatchery,  
17 and I think the name of the town is Altmar, New  
18 York, but it's at the Salmon River Fish  
19 Hatchery.

20 Q. Prior to this event, had you ever  
21 met the governor?

22 A. No.

23 Q. And putting aside the interaction  
24 between you and the governor, what were the  
25 sort of planned events for this event?

## LIMMIATIS

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2           A.       So the planned event began as  
3 [REDACTED].   So in my capacity working with  
4 my contact at the DEC to put together a press  
5 release.

6                   And then a few days before the  
7 actual press release, I understood, through my  
8 contact at the DEC, that the governor was going  
9 to be in the area, and so that the State of New  
10 York was actually going to be holding this  
11 press event.

12                   So [REDACTED] was not permitted  
13 to actually host the event, but it was then  
14 going to become a State of New York  
15 announcement at the Salmon River Fish Hatchery.

16                   So, basically, the work that the  
17 DEC, my colleague at the DEC and I had put  
18 together for this announcement was then taken  
19 over by the state and it became their  
20 announcement on that day.

21                   So it went from us leading the --  
22 leading the announcement to us taking a  
23 backseat.

24           Q.       And were you told -- once it became  
25 sort of a State of New York event, were you

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LIMMIATIS

told what sort of the schedule or plan was for what was going to happen at the event?

A. No.

Q. Were you given any role to have during the event? Were you told what you're going to do either by the State of New York or by [REDACTED] ?

A. No. We were basically told that it was a State of New York event and that we were invited to serve as guests, so we could sit in the audience.

Q. And who from -- who else, other than you, from [REDACTED] attended the event?

A. So my colleagues [REDACTED], [REDACTED].

Q. Anyone else?

A. Not that I recall.

Q. And do you recall what you were wearing that day?

A. Yes. I had my [REDACTED] branded T-shirt and a pair of jeans.

MS. CLARK: And, Ezra, could you pull up tab 2 and share that?

(Exhibit 2, Photograph, marked for

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identification.)

Q. And this is something that your lawyer sent to us.

Do you recognize this?

A. I do.

Q. What is this?

A. That's me wearing my [REDACTED] T-shirt.

Q. And is it the exact same T-shirt you were wearing that day or one similar to it or something else?

A. It's the exact same T-shirt.

Q. Okay. And then it has the [REDACTED] [REDACTED] logo across the top?

A. Yes.

Q. Okay.

MS. CLARK: Okay. You can take that down, Ezra.

Q. Did you take any other photos at the event that day?

A. No. I took photos of the event, but that's it.

Q. And the photo that we just saw of you in the T-shirt, was that taken at the event

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or was that taken at some other point?

A. That was taken at some other point.

Q. When was that photo taken?

A. I believe just a few weeks ago.

Q. Okay. So you did take some photos at the event?

A. Yes.

MS. CLARK: Ezra, why don't you put up tab 3, just so we make sure we identify everything.

(Exhibit 3, Photograph, marked for identification.)

Q. Is this one of the photos that you took at the event?

A. Yes.

Q. And it looks like that's the governor seated; is that correct?

A. That's correct.

Q. And do you know who the other people are to the left of the governor?

A. Yes. Shaking his hand is my colleague, [REDACTED], and I'm not familiar with the other two behind [REDACTED].

Q. Okay.



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MS. CLARK: Ezra, can you put up tab 4?

(Exhibit 4, Photograph, marked for identification.)

MR. CUKOR: Yes, just a second. I just need to tab over.

Q. Okay. Is this another photo you took?

A. Yes.

Q. A lot more people in this photo. Do you recognize any of the people in this photo?

A. I recognize [REDACTED]. So it looks like he's standing to the right behind the governor.

Q. In the -- it looks like a white or light blue shirt?

A. Yes.

Q. Do you know any of the other people who are in the photo?

A. I do not.

Q. Okay.

MS. CLARK: Ezra, you can take that down.

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Q. So you got to the event.

How many people were at the event?

A. It was a large group of people, as I recall. The governor's, I will call them media folks, planning and event folks had put together a really nice event with chairs and a canopy, a stage, as well as a dais where folks went on stage and delivered remarks.

So the seating was at capacity. And there were dozens of people standing behind those folks seated behind in a canopy area. So it was very, very well attended.

Q. And were you seated or were you standing in the canopy area or somewhere else?

A. I was seated at times, but also, you know, taking some photos and chatting with members of the media. So I was kind of on the move, which is typically what I do. And in my role in media relations, that's one of the things that we do is, you know, continue to be sort of a consensus builder and network as a representative of [REDACTED].

So I was both seated and walking around in the area.

LIMMIATIS

1  
2 Q. And did you speak to any of the  
3 governor's press or communications people?

4 A. I did not.

5 Q. And there was then some sort of  
6 formal program; is that right?

7 A. Yes, there was. So several folks  
8 did speak, including the governor, talking  
9 about various, I'll call it historical facts  
10 about the Salmon River, as well as economic  
11 development programs and what the state is  
12 trying to do, those initiatives, to buoy the  
13 area.

14 So very, very good, I will call it  
15 collaborative messaging with regard to  
16 partnerships from the state, and what they're  
17 trying to do in terms of environmental  
18 conservation.

19 So lots of members of sort of an  
20 entourage, if you will, or those subject matter  
21 experts from the state and local municipality  
22 talking about that partnership with the state  
23 and local leadership.

24 Q. And about how long did the speeches  
25 go on for?

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A. I'm going to guess about a half hour, maybe slightly longer.

Q. And once the speeches ended, then what happened?

A. Once the speeches ended, there were photographs taken, as you can see with the formal signing of the agreement, the formal land transfer agreement, and then the governor and his entourage moved down to the river's edge.

Q. And what were they doing down at the river's edge?

A. So there were members of the Salmon Fish Hatchery who had buckets of fish they were introducing into the river. And so I believe that he grabbed a bucket or was taking fish out of the bucket and then placing them in the river.

Q. And where were you when the governor was putting the salmon into the river?

A. So I was actually sort of part of the press corp who followed him from the formal stage area down to the river's edge, and there were a group of us who were kind of lined up in

## LIMMIATIS

1  
2 sort of a wedding reception style, I will call  
3 it, line, on the side of the river watching him  
4 participate in introducing fish into the river.

5 So there were a group of us members  
6 of the media who were lined up next to the  
7 river.

8 Q. And about how many people were in  
9 this sort of reception line?

10 A. I would -- I would guess there were  
11 probably maybe close to a dozen, a dozen folks  
12 between -- you know, I can't be exactly sure,  
13 but I would say upwards of about a dozen  
14 people.

15 Q. And were you at one end or the other  
16 or somewhere in the middle?

17 A. I was in the middle. There were  
18 members of the press to my right. I was in the  
19 middle, and there were a few to my left.

20 Q. And after the governor put some  
21 salmon in the river, what happened next?

22 A. Then he walked up to the sort of  
23 reception area, as I call it, receiving line of  
24 us members of the media, and he went from the  
25 first person up to the -- of the line, saying

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hello and shaking folks' hands, exchanging, it looked like, you know, just some well wishes.

And I was sort of in the middle of that line, looking down at him, and looking forward to saying hello and thinking maybe I will have a chance to thank him for the partnership. So I was in the middle of that line.

Q. And as the governor was making his way down the line before he got to you, did he hug any of the people that he interacted with?

A. No.

Q. Did he kiss any of them?

A. No.

Q. Did he touch any of them other than to shake their hand?

A. Not that I recall.

Q. So when the governor got to you, what happened?

A. So I extended my hand and I said, Governor, thank you so much for coming to today's event. My name is Virginia Limmiatis. I represent [REDACTED], and we are so thrilled to have you here today and formalize

1 LIMMIATIS

2 this partnership. So I extended my hand. I  
3 said some words of congratulations.

4 And then he walked right up close to  
5 me and he put his finger on my shirt, starting  
6 with the [REDACTED], and went across my  
7 chest, my breasts, going from letter to letter  
8 to letter, starting with the [REDACTED]  
9 [REDACTED], and he said, [REDACTED], I  
10 know you.

11 Q. And was he using his right hand?

12 A. I believe he used his right hand.

13 Q. And he was, you know, like using his  
14 index finger or was he using more than one  
15 finger or --

16 A. I think, as I recall, it went like  
17 this. (Indicating.)

18 Q. Okay. You think his first two  
19 fingers?

20 A. I believe so.

21 Q. And you just made a gesture. So he  
22 put his fingers on the [REDACTED] and then slid the  
23 fingers across the logo?

24 A. Yes. Like this, touching each of  
25 the letters, yep.

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Q. So for the written record, it looks like he was like pressing a letter and then sliding his finger over to the next letter, and pressing the next letter, and doing that throughout the words [REDACTED]; is that correct?

A. That's correct. That's correct.

Q. And when he got to the end of [REDACTED], what happened next?

A. Then he looked up at me and he came over to the side of my face, to my cheek, and he whispered in my ear, so his face was right up to my cheek, and whispered in my ear and he said, I'm going to say that I see a spider on your shoulder.

Q. And when he was whispering in your ear, was his face touching your face?

A. Yes, it was.

Q. And up until this point, while he was saying [REDACTED], I know you, and the spider, did you say anything in response to any of those statements by the governor?

A. I did not. I was in absolute shock.

Q. So after he whispered in your ear



1 LIMMIATIS

2 that he was going to say there was a spider on  
3 your shoulder, what happened next?

4 A. I looked down to see his hand going  
5 like this on my shoulder, going like this,  
6 trying to push something away. And I looked  
7 down to see, is there a spider.

8 I mean, my reaction was just I was  
9 appalled and shocked at what just happened, and  
10 I looked down and, of course, I did not see a  
11 spider.

12 And then I looked up at him and he  
13 could see that I was in shock, and he just  
14 looked up at me, and a few seconds later walked  
15 to the person to my right.

16 Q. And when you gestured of him making  
17 a gesture like he was brushing off a spider,  
18 did you see any spider on you or on the ground  
19 after he made that gesture?

20 A. No, I did not.

21 Q. You said he said he was going to  
22 brush your shoulder. The gesture you made  
23 looked like it was not at the top of your  
24 shoulder, but was more somewhere between your  
25 shoulder and your breast?

1 LIMMIATIS

2 A. Yes. So I don't know what this area  
3 would be called, but yes, it's midway.

4 Q. Sort of below your collarbone?

5 A. Yes.

6 Q. And when he moved down to the rest  
7 of the line, as he moved to the next person,  
8 what, if anything, did you do?

9 A. I looked to my left and to my right  
10 to see if someone was saying something to him,  
11 like, hey, buddy, what are you doing, to look  
12 to see, among my colleagues, if someone  
13 recognized or saw what he just did to me.

14 And, apparently, the best way I can  
15 describe it is the expression on the eyes of  
16 the folks to my left and to my right, they were  
17 just focused on him.

18 So my assumption, when I quickly  
19 looked to my left and to my right, was that  
20 people just didn't -- didn't see what he did.  
21 They were focused on his eyes.

22 Q. And do you recall who was  
23 immediately on your left and right?

24 A. I don't, but they were members of  
25 the media.

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Q. And did you see the governor then proceed down the rest of the line?

A. Yes, I did.

Q. And did he touch anyone on the rest of the line?

A. Outside of a handshake, I don't -- I don't know.

Q. And what were you thinking when the governor did this to you?

A. I was absolutely humiliated. It's very difficult even talking about it. I was absolutely profoundly humiliated and appalled. I was in shock. Very negative feelings is the best way to describe it.

And I left that area and I immediately went up to my colleagues and told them what happened.

Q. We'll get to that in one second.

After the governor went to the end of the line, what did he do?

A. I believe that that group had dispersed, and I don't know where he went after that, but I could see that, at some point, he was milling about the crowd of folks, but I

1 LIMMIATIS

2 was -- I was with my team, and that's all I  
3 remember at this point.

4 Q. So you said you went to your team.  
5 Where were they?

6 A. They were up towards the stage area.

7 Q. And when you say your team, was it  
8 the three people you identified that you recall  
9 going?

10 A. Yes.

11 Q. And were they all together when you  
12 walked up to them?

13 A. Yes, they were.

14 Q. So what happened when you approached  
15 them?

16 A. My first recollection was I told  
17 them that the governor touched me and that he  
18 was telling me that there was a spider and made  
19 gestures on my shoulder, on my body, on my  
20 chest that there was a spider on my chest and  
21 pretended to remove it.

22 And I believe that, at least the  
23 folks who were there, could recognize that I  
24 was very, very disturbed by it.

25 So I did share with these three

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folks what happened.

Q. And when you said you told them that the governor touched them, did you specifically say that he touched your breasts or touched the logo on the T-shirt you were wearing or something on those lines?

A. I told them that he touched the logo on my chest. I don't believe I went into detail with regard to my breasts, you know, I was so embarrassed. I mean, how do you tell -- how do you tell colleagues what happened.

But I did tell them that he touched my T-shirt and the logo and I told them about the spider.

Q. And do you recall anything that they said to you when you told them what happened?

A. I don't recall specifically. I know that my one colleague [REDACTED] expressed concern and support for me.

Q. And how long had you known [REDACTED] [REDACTED] ?

A. Just for a few years. I had worked with him specifically on this project. So I worked with him perhaps maybe six months on the

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project. So this project specifically, about six months.

Q. And what about [REDACTED], how long had you worked with them?

A. So I worked with [REDACTED] since joining the company in 2010, and [REDACTED] [REDACTED], similarly. I became familiar with [REDACTED] because of this project.

Q. After you told them, how much longer did you stay at the event?

A. Not much longer, maybe -- maybe 20 minutes after that. So not a considerable amount of time.

Q. And did you have any interactions with the governor once you left the receiving line?

A. No.

Q. And did you speak to anyone in the governor's entourage -- whoops. I'll wait till you stabilize that.

MS. WANG: I think you may have hit the mute button, Virginia.

A. Sorry about this.

Q. That's okay. Okay.

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Did you speak to anyone from the governor's entourage after you left the receiving line?

A. No, I did not.

Q. Since that event, have you spoken to [REDACTED] about what happened?

A. No, I have not.

Q. Have you spoken to [REDACTED] about it since the event?

A. No, I have not.

Q. Was this event in the morning or the afternoon?

A. It was around noon. So I would say late, late morning, early afternoon.

Q. And so did you go back to the office after the event?

A. I did.

Q. When you got to work, did you tell anyone at work about what had happened?

A. I told my boss.

Q. And who was your boss at the time? Was it [REDACTED]?

A. Yes.

Q. What did you tell [REDACTED]?

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A. I told her the same thing that I told the folks at the Salmon Fish Hatchery. I told her that he had touched the logo on my T-shirt and pretended that he was removing a spider off my shoulder.

Q. And what did she say in response, if anything?

A. She felt -- she felt terrible. She asked me if I was okay, but she did express concern.

Q. Did she discuss with you whether you wanted to report this in some fashion either within [REDACTED] or to someone in the governor's office?

A. Not that I recall.

Q. Did you talk to anyone at the time about the possibility of reporting this either within [REDACTED] or to someone in the governor's office?

A. No, I did not. Mainly because I was -- you know, there's some trepidation and fear. You know, how do you explain to someone what the governor did in public, such an egregious act, heinous act. I was very



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fearful, actually, you know, how does someone believe that this happened to me.

So there was some trepidation with regard to people believing me. And so that's mainly why I didn't elevate this any higher.

Q. Other than the people you've just described in or around that time period, did you tell anyone else in your life, colleagues, friends, family?

A. Yes, I told my sister, [REDACTED].

Q. How long after the event did you tell this to [REDACTED]?

A. I'm sorry. It was within a day or two. So, in fact, it could have even been on my ride home, but it was within short order that I reached out to my sister.

Q. Was that by telephone?

A. Yes.

Q. And what did you tell your sister?

A. I told her the events of the day and I told her that he touched my breasts.

Q. What, if anything, did your sister say in response?

A. She was horrified and asked me if I

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was okay and mainly, mainly concerned for my safety and health. And she wanted to just ensure that I was okay.

And as sisters do, they provide, you know, a sounding board, and she was just -- just heartbroken for me, very difficult.

Q. And what does your sister do for -- what was your sister doing for work, if anything, at that time?

A. I believe my sister, at the time, was the [REDACTED] at [REDACTED] in [REDACTED]. She is a [REDACTED] [REDACTED]

Q. Did you tell anyone else in or around that time period?

A. Yes. I told my ex-husband, [REDACTED] [REDACTED] and I also shared it with my cousin, [REDACTED]

Q. When did you tell your ex-husband?

A. Within a few days. So I would say about a week.

Q. And what did you tell him?

A. I told him the events of the day and that the governor touched my breasts, and

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relayed the details of the story about the spider and -- and just shared with him the details of the day, the act and my feelings.

Q. What, if anything, did he say in response?

A. He was in shock. He was absolutely in shock. Again, coming from a space of are you okay, is there anything I can do to help you, but just providing a sounding board and like my sister and cousin and [REDACTED], you know, just absolute disbelief, absolute disbelief at what happened.

Q. And at the time you spoke to your ex-husband, was he working?

A. Yes. He's [REDACTED] for [REDACTED] [REDACTED].

Q. [REDACTED]. [REDACTED] [REDACTED].

A. Yeah.

Q. Did he give any advice to you about any legal options or whether you should or shouldn't report it or anything along those lines?

A. Not that I recall.

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Q. And you said you also spoke to your cousin, [REDACTED]. When did you speak to her?

A. Around the same time frame that I reached out to [REDACTED], so within the week.

Q. And what did you tell her?

A. I told her the events of what the governor did. She was a lot more colorful in her emotions, but mainly coming from a space of love, making sure that I was -- I was okay. And just, you know, again, just completely appalled at his actions towards me.

Q. You said her response was a little more colorful.

Do you recall what she said?

A. She called him a creep, you know, for beginners. But, you know, just, again, appalling behavior and the complete and utter arrogance to violate someone who's just there to do her job.

And I think she also said narcissist, but that's what comes to mind.

Q. And, at the time, was your cousin working someplace?

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2 A. She was. I believe that she was  
3 working at [REDACTED]. She is a [REDACTED]  
4 [REDACTED]. So I believe, at  
5 that time, she was working for [REDACTED].

6 Q. Is there anyone else you told in  
7 that time period other than the people you've  
8 gone through with us?

9 A. Not that I recall.

10 Q. After that event, have you been at  
11 any other event where you interacted with the  
12 governor?

13 A. No, I have not.

14 Q. Did the governor at any point,  
15 either directly or through his staff, reach out  
16 to you after the event?

17 A. No.

18 Q. Did the governor or his office send  
19 you any pictures from the event?

20 A. Not that I recall.

21 Q. Since the allegations started to  
22 become public about the governor allegedly  
23 engaging in sexually harassing behavior, has  
24 anyone from the governor's office reached out  
25 to you?

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A. No.

Q. Did you tell people about the --  
strike that.

When did you first start talking  
about the incident more recently?

A. It was March 4 of this year. I was  
having coffee, and I was reading the headlines  
and news of the day, and I came across an  
article that was published with regard to a  
press conference that he held on March 3, so  
the day before.

And I was reading the details of the  
press conference where he says, I never touched  
anyone inappropriately, and that is really  
what's triggered this.

I reached out to my boss and I said,  
I need to tell you that I'm not okay with this,  
and so that's when the discussion started, was  
on March 4, when I -- yeah, March 4 or 3rd,  
when I reached out to my boss and I said, I'm  
not okay with this, this is what I read and  
this is a complete fabrication. He's lying,  
because he touched me. He touched me  
inappropriately.

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Q. And when you say your boss, that's [REDACTED] ?

A. Yes.

Q. And what did she say in response?

A. She said, let's take this to ethics.

Q. And when you say "take it to ethics," that's within [REDACTED] ?

A. Yes.

Q. And so did you speak to someone in [REDACTED] ethics committee or office?

A. I did.

Q. And what other conversations have you had with anyone between speaking to [REDACTED] and today about what happened back in May of 2017?

A. No one -- no one other than my attorney, Mariann Wang, and [REDACTED] and our ethics people. So it's limited to those -- those folks.

Q. And did you speak to anyone within the ethics department about either you or they reporting this to the governor's office?

A. No.

Q. Did [REDACTED] ethics

LIMMIATIS

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2 department say whether they were going to take  
3 any action in response to you raising this  
4 concern with them?

5 A. No. Other than support of me and  
6 what I needed to do to make sure that I was  
7 safe and I was represented and that my needs  
8 were met in terms of me coming forward, so just  
9 complete and tireless support of me.

10 So I would say that it's the best  
11 way to characterize it is just support of my  
12 needs, to see that I was okay.

13 Q. Did you speak to any of your  
14 co-workers more recently who were at the event  
15 that day?

16 A. No.

17 Q. Did you tell any family or friends  
18 that you were now going to speak out in some  
19 fashion about this?

20 A. I just -- I believe it was just only  
21 my sister, [REDACTED], who I had asked if she would  
22 speak on my behalf, but it was only limited to  
23 [REDACTED].

24 Q. And did your sister give you any  
25 advice when you told her that you were going to



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do something about what happened?

A. No, she did not. Just -- she just said, I love you, and that's mainly it. Just, you know, support of me, but no advice.

Q. And you said you read about the governor's press conference.

Have you read about some of the other women who have come forward and their allegations?

A. I have.

Q. Do you know any of the women who have spoken out publicly about what happened to them with the governor?

A. No, I do not.

Q. Has anyone, even if they're not somebody who has come forward publicly, ever told you that they had any -- you know, after there was press and people were talking about things, has anyone else told you that they had an experience with the governor that made them uncomfortable?

A. No.

MS. CLARK: Joon, do you have questions?

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MR. KIM: Yeah.

EXAMINATION BY

MR. KIM:

Q. Can I just -- following up on the actual incident, where he ran his -- he ran his fingers across your T-shirt, you said that the people -- the people immediately to your left and right were members of the media?

A. Yes.

Q. But you don't remember specifically who they were?

A. I do not.

Q. Do you remember there being anyone behind the governor or anyone else who would have been sort of within sight lines of you and the governor?

A. I don't recall anyone behind him.

Q. Okay. And so was he walking alone when he was going down the line of people?

A. He was.

Q. The colleagues that you spoke to right after, I think it was [REDACTED] and [REDACTED], are they still there at [REDACTED]?

A. Yes, they are.

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MR. KIM: That's all I have.

Thanks, Anne.

FURTHER EXAMINATION

BY MS. CLARK:

Q. Just one question.

When he was going down this receiving line, was the receiving line sort of facing the river?

A. It was -- it was perpendicular.

Q. Okay. And was the canopy and -- was that behind you or in front of you?

A. It was up towards the Salmon Fish Hatchery facility. So it was -- I don't know how many feet away it was, but it was up towards sort of a flat plateau near the fish hatchery.

Q. And the stage, was the stage up by the canopy?

A. Yes.

MS. CLARK: I don't think we have any more questions unless Joon wants to jump in with something or Ezra.

Q. Is there anything you would like to put on the record before we wrap up?

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MS. WANG: Anne, may I interrupt and just ask if we can have a brief break so that I can talk to her to see whether she wants to say something?

MS. CLARK: Absolutely.

MS. WANG: Okay. I'd appreciate that. Like just five minutes.

MS. CLARK: Okay.

THE VIDEOGRAPHER: Going off the record now at 10:48 a.m.

(Recess taken.)

THE VIDEOGRAPHER: We are now going back on the record at approximately 10:58 a.m.

Go ahead, Counsel.

BY MS. CLARK:

Q. Ms. Limmiatis, I understand there's something that you'd like to correct from what you said earlier.

A. Yes. Thank you.

I misstated with regard to folks that I spoke with over the last several months. And so you had asked me if I spoke with anyone, and the answer is yes.

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2 So I spoke with my colleagues who  
3 were present at the event to notify them that I  
4 was considering coming forward and I had gotten  
5 an attorney.

6 So I misunderstood the question. So  
7 I just wanted to share with you that I did  
8 speak with those colleagues and my family,  
9 letting them know that I was considering coming  
10 forward and I had gotten an attorney.

11 Q. And when you spoke to each of your  
12 colleagues, we're going to go through them one  
13 by one, and let us know what you said to them  
14 and what they said to you about that.

15 A. Sure. Do you want me to go through  
16 them by name or just in general --

17 Q. By name. Unless you spoke to them  
18 as a group, what you said to each of them and  
19 what they said in response.

20 A. Sure. I contacted [REDACTED]  
21 [REDACTED], and let him know that I had  
22 considered coming forward and that the nature  
23 of that press conference, I will call it the  
24 quote that I read, as a result of that press  
25 conference and the many articles, was

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2 disturbing to me, and that I was considering  
3 coming forward because he had touched me, and I  
4 said, you know, he had touched my T-shirt, and  
5 I said, I'm going to come forward because he's  
6 not being truthful.

7 So I said, I'm considering coming  
8 forward and getting an attorney, and that's --  
9 yes.

10 Q. What, if anything, did he say?

11 A. He had said, you have my support. I  
12 believe he said I'm proud of you. This is not  
13 easy. And he just showed support.

14 Q. Anything else you recall in the  
15 conversation between you and [REDACTED] ?

16 A. I do not.

17 Q. And did you also reach out to [REDACTED]

18 A. I did. I reached out to [REDACTED] I  
19 told him the same thing, that I had read this  
20 news article, and that I was disheartened to  
21 see that he was not owning his actions with  
22 these other women, and that I personally -- and  
23 I said, [REDACTED] as you are aware, I personally  
24 was touched inappropriately, and what he said  
25 was not true.

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And I said, I'm just letting you know that I'm considering getting an attorney and moving forward on this.

Q. And what, if anything, did [REDACTED] say in response?

A. Again, he showed nothing but support, and he said, you know, I've been thinking about you, and I was basically wondering if this is something that you are going to come forward and move forward on.

Q. And when did you speak to [REDACTED] and [REDACTED]

A. I don't recall exactly, but it was many months ago.

Q. But some time after the March 4 press conference you read about?

A. Yes.

Q. And did you also speak to [REDACTED]

A. I did. And I similarly shared with him that I was considering coming forward and retaining an attorney, and I said -- and his response to me, again, was nothing but support.

He said, you know, I just was talking recently with my own wife about it, and

1 LIMMIATIS

2 he said, I shared with her that I was wondering  
3 if you were going to come forward. And so he  
4 showed, you know, empathy and support.

5 Q. Is there anyone else between,  
6 March 4 and today, that you spoke to about  
7 coming forward or thinking about coming  
8 forward?

9 A. My cousin, [REDACTED], my sister, [REDACTED],  
10 who I mentioned earlier, and [REDACTED]. And I said,  
11 this is something that I'm considering doing.  
12 And, again, their response was support and  
13 love.

14 Q. And I understand that you wanted to  
15 take us up on our offer to make a statement?

16 A. Yes. Thank you. Bear with me while  
17 I read this. Tell me when you're ready.

18 Q. All set. I'm set. Is the court  
19 reporter set? Just don't go too -- sometimes  
20 when people read things, they tend to go  
21 quickly, so try to go slowly.

22 A. Okay. Nothing would prepare me for  
23 May [REDACTED] 2017, a day that, for me, was the  
24 culmination of a lot of hard work with the team  
25 at [REDACTED]



## LIMMIATIS

1  
2           The day started with excitement and  
3 joy, but quickly turned into something ugly  
4 because of the actions of the governor.

5           I was there as a professional to do  
6 my work. The governor turned a sincere gesture  
7 of simply extending my hand as an expression of  
8 gratitude for the state's partnership into a  
9 moment of profound shame and humiliation.

10           I don't pretend to know precisely  
11 what went through the governor's mind on that  
12 day, but I know that his actions were not  
13 ambiguous. He placed and pressed, then moved  
14 his finger across my breasts in a way that  
15 clearly meant to show me his power and his  
16 ability to control my body and my dignity.

17           And I do know what I felt. I felt  
18 he violated me. The governor made me feel  
19 dirty and cheap. He did not respect me as a  
20 professional and a contributor to the project.

21           Any adult man would have known that  
22 doing this was inappropriate and demeaning.  
23 His behavior just a split second later, his  
24 leaning in and whispering that he was going to  
25 make up an excuse about a spider shows me that

LIMMIATIS

1  
2 he knew immediately that he had done something  
3 wrong and that he had to create a cover story.

4 I want to tell the governor that  
5 this is not about cancel culture. This is  
6 about consequences.

7 My coming forward is a direct result  
8 of the governor's March 3 press conference in  
9 which he said, I never touched anyone  
10 inappropriately.

11 He is lying again. He touched me  
12 inappropriately. I am compelled to come  
13 forward to tell the truth.

14 I do not know how to report what he  
15 did to me -- I didn't know how to report what  
16 he did to me at the time and was burdened by  
17 shame, but not coming forward now would make me  
18 complicit in his lie, and I won't do it.

19 I am a cancer survivor. I know an  
20 oppressive and destructive force when I see it.  
21 Thank you.

22 MS. CLARK: Thank you very much,  
23 Ms. Limmiatis. We're done. There might  
24 be some follow up that we need to -- if  
25 there's any developments where we need any

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additional information from you, we'll reach out to your counsel, but I want to thank you very much for spending time with us today and for reaching out, having your attorneys reach out to us.

THE WITNESS: Thank you.

MS. WANG: Thank you.

MS. CLARK: We can go off the record.

THE VIDEOGRAPHER: Going off the record now at 11:06 a.m.

(Time noted: 11:06 a.m.)

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----- I N D E X -----

WITNESS	EXAMINATION BY	PAGE
VIRGINIA LIMMIATIS	MS. CLARK	5, 51
	MR. KIM	50

----- EXHIBITS -----

WITNESS 6/9/2021		PAGE
Exhibit 1	Subpoena	14
Exhibit 2	Photograph	23
Exhibit 3	Photograph	24
Exhibit 4	Photograph	25

(EXHIBITS ATTACHED)

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C E R T I F I C A T E

STATE OF NEW YORK )

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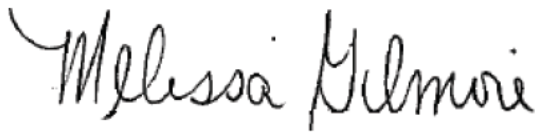
COUNTY OF RICHMOND)

I, MELISSA GILMORE, a Notary Public within and for the State of New York, do hereby certify:

That VIRGINIA LIMMIATIS, the witness whose deposition is hereinbefore set forth, was duly placed under oath by me and that such deposition is a true record of the testimony given by such witness.

I further certify that I am not related to any of the parties to this action by blood or marriage; and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 14th day of June, 2021.



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MELISSA GILMORE