



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

SUBPOENA AD TESTIFICANDUM
THE PEOPLE OF THE STATE OF NEW YORK
GREETINGS

TO: **SEE #1**
c/o Debra Katz, Esq.
Katz, Marshall & Banks, LLP
1718 Connecticut Ave. NW, 6th Fl.
Washington, DC 20009

YOU ARE HEREBY COMMANDED, pursuant to Executive Law § 63(8) and § 2302(a) of the New York Civil Practice Law and Rules, to appear and attend before the Special Deputies to the First Deputy Attorney General, on the **15th Day of June, 2021, at 10 a.m.** or any agreed upon adjourned date or time, via phone, to testify in connection with an investigation into allegations of and circumstances surrounding sexual harassment claims made against Governor Cuomo, or any matter which 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 § 2308 of the New York Civil Practice Law and Rules and/or other statutes.

WITNESS, The Honorable Letitia James, Attorney General of the State of New York, this 27th day of May, 2021.

By: _____
/s/
Joon H. Kim
Jennifer Kennedy Park
Abena Mainoo
Special Deputies to the
First Deputy Attorney General
[REDACTED]@ag.ny.gov
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By: _____
Anne L. Clark
Yannick Grant
Special Deputies to the
First Deputy Attorney General
[REDACTED]@ag.ny.gov
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STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

SUBPOENA DUCES TECUM
THE PEOPLE OF THE STATE OF NEW YORK
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TO: **SEE #1**
c/o Debra Katz
Katz, Marshall & Banks, LLP
1718 Connecticut Avenue, NW
Sixth Floor
Washington, DC 20009

YOU ARE HEREBY COMMANDED, under Executive Law § 63(8), 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 21st day of May, 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 Executive Law § 63(8), New York Civil Practice Law and Rules § 2308, and other statutes.

WITNESS, The Honorable Letitia James, Attorney General of the State of New York, this 11th day of May, 2021.

By: 

Joon H. Kim
Jennifer Kennedy Park
Abena Mainoo
Special Deputies to the
First Deputy Attorney General
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By: /s/ Anne L. Clark

Anne L. Clark
Yannick Grant
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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, posts on any social media account You control (including but not limited to Facebook, Instagram, and Twitter), all other Communications, 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 You, Jessica Bakeman, Charlotte Bennett, Lindsey Boylan, Karen Hinton, Ana Liss, Alyssa McGrath, Anna Ruch, Sherry Vill, and any other individual who has made any Complaints known to You, any member of the Executive Chamber, or the public, whether anonymously or otherwise. For the avoidance of doubt, to the extent additional allegations come to light following

the issuance of this Subpoena, individuals who make such allegations should be included in this definition.

2. “Complaint” means any and all complaints, allegations, comments, accusations, or other statements of workplace misconduct, sexual harassment, sex- or gender-based misconduct, or other behavior or comments of a sexual, abusive, or otherwise inappropriate or uncomfortable nature, whether made formally or informally.
3. “Executive Chamber” means the Executive Chamber of the State of New York, including but not limited to Governor Andrew M. Cuomo, and all other officers, directors, supervisors, personnel, employees, secretaries, interns, fellows, agents, contractors, consultants, representatives, and attorneys of the Executive Chamber, or any other Persons associated with or acting on behalf of the foregoing, or acting on behalf of any predecessors, successors, or affiliates of the foregoing at any point during the relevant time.
4. “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 [REDACTED] and any agent, attorney, or other representative associated with or acting on behalf of You at any point during the relevant time.
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, employees, staff, agents, representatives, attorneys, consultants, 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 September 1, 2019 forward.

D. Documents to Be Produced

1. Any and all Documents related to any Complaint concerning the Governor, including any investigation thereof.
2. Any and all Documents concerning Communications with or about a Complainant (other than You).
3. Any and all Communications between You and any current or former member of the Executive Chamber since December 1, 2020.
4. Any and all Documents concerning Your or any other Complainant's attendance at an event, appointment, or meeting at which the Governor was or would be present.
5. Any and all Documents concerning any Communications with the media or public or other public statements about any Complaint concerning the Governor.
6. Documents sufficient to identify Your employment history at [REDACTED], including but not limited to the time period of Your employment, Your title(s), Your position(s), and Your supervisor(s).

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

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

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

NATIVEFILE	Relative file path of the native file on the production media.	.\Native_File\Folder\...\BEGDOC.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: _____

Redacted in original production

From: [REDACTED]
Sent: Saturday, September [REDACTED], 2019 1:02 PM
To: SEE #1 [REDACTED]
Subject: Re: Current Plan for Tomorrow's Governor's Event

Who's there — [REDACTED] ?

Sent from my phone

On Sep [REDACTED] 2019, at 12:55 PM, SEE #1 [REDACTED] wrote:

Great Just chatting with the Governor's team and the invited environmental reps Press is arriving

Sent from my iPhone

On Sep [REDACTED] 2019, at 12:41 PM, [REDACTED] wrote:

I think it may be just you and [REDACTED] maybe there The Gov's office didn't want PEP

Sent from my phone

On Sep [REDACTED] 2019, at 12:38 PM, SEE #1 [REDACTED] wrote:

I am at [REDACTED] now See some of you soon

Sent from my iPhone

On Sep [REDACTED] 2019, at 12:30 PM, [REDACTED] wrote:

Of course!

On Sep [REDACTED] 2019, at 12:30 PM, [REDACTED] wrote:

Thanks for being willing!

Sent from my phone

On Sep [REDACTED] 2019, at 12:29 PM, [REDACTED] wrote:

[REDACTED] let me know all's under control so I'm heading back to BK Good luck!

On Sep [REDACTED] 2019, at 12:26 PM, [REDACTED] wrote:

That's great, thanks

Sent from my phone

On Sep [REDACTED] 2019, at 12:26 PM, [REDACTED] wrote:

I'm still planning on going just to have an [REDACTED] amongst the press and environmentalist

Sent from my iPhone

On Sep [REDACTED] 2019, at 12:08 PM, [REDACTED] wrote:

The Gov will still announce 50 acres in [REDACTED] and the 1.5m as part of our broader announcement so feel free to come if you'd like [REDACTED] and [REDACTED] will be there

Sent from my iPhone

On Sep [REDACTED] 2019, at 11:50 AM, [REDACTED] wrote:

Got it Thanks See you soon

[REDACTED]

On Sep [REDACTED] 2019, at 11:21 AM, [REDACTED] wrote:

Final - Gov arrives [REDACTED] north tunnel approx 1:45
Traverses garage to doorway west Debarks via buoy
tender 2 pm to [REDACTED] Press debarks via 2 [REDACTED] vessels from
[REDACTED] approx same time Event at head of [REDACTED]
All vessels then travel back to [REDACTED] at approx 2:30

EXHIBIT

3

SEE #1_00030

Press conf follows [REDACTED] Gov departs at end of press
conf approx 3 [REDACTED] to be locked prior

Sent from my iPhone

On Sep [REDACTED] 2019, at 10:44 AM, [REDACTED]
[REDACTED] wrote:

Okay At this point unless someone tells me
they need me earlier, I'm planning to arrive at
[REDACTED] office around 12:30 just to be in the
vicinity if needed

Sent from my iPhone

On Sep [REDACTED] 2019, at 10:14 AM, [REDACTED]
[REDACTED] wrote:

I am sure [REDACTED] and [REDACTED] will
provide final confirmations or
details after they meet with [REDACTED]
but I was just advised by [REDACTED] that
the plan is still for guests, not the
Governor, to board the 2 [REDACTED]
vessels at [REDACTED] at about 1:15
pm The Governor will depart
from [REDACTED] at about 2 on the
[REDACTED] boat All guests will return to
[REDACTED] for the press conference
For both arrival and departure, the
Governor will connect with
[REDACTED] while the guests will
use the south side Again, this is
preliminary Until after [REDACTED]
and [REDACTED] meeting

Sent from my phone

On Sep [REDACTED] 2019, at 9:26 AM,
[REDACTED] wrote:

Ok How soon do you
think I should I aim to
be at [REDACTED]?

On Sep [REDACTED] 2019, at
9:15 AM, [REDACTED]
[REDACTED] wrote:

[REDACTED] and
I are
meeting
[REDACTED] Staffer#4 at
10 Stay
tuned

Sent
from my
iPhone

On Sep
[REDACTED] 2019,
at 8:10
AM,
[REDACTED]
[REDACTED] wrote:

Also
nothing
on
this
end!
Standing
by
:)

Sent
from
my
iPhone

On
Sep
[REDACTED]
2019,
at
8:03
AM,
[REDACTED]
[REDACTED] wrote:

Nothing

Sent
from
my
phone

On
Sep
█
2019,
at
8:02
AM.

█
█
█
wrote:

Anyone
heard
anything

Sent
from
my
iPhone

On
Sep
█
2019,
at
8:02
PM.

█
█
█
wrote:

Okay!

Sent
from
my
iPhone

On
Sep
█
2019,
at
7:59
PM.

█
█
█
wrote:

Hopefully
we
will
get
a
final
plan
sent
to
us
late
tonight
or
in
the
am
Besides
█
we
are
not
invited
onto
vessels
at
this
point
Watch
your
phones
and
we'll
finalize
who
is
going
where
once
we
know
more

Sent
from
my
phone

On
Sep
[REDACTED]
2019,
at
7:53
PM,

[REDACTED]

wrote:

I
think
you,
[REDACTED] SEE #1
and
I
will
be
enough!
Thanks
so
much

On
Sep
[REDACTED]
2019,
at
7:52
PM,

[REDACTED]

wrote:

[REDACTED]
I'll
be
there
and
can
help
out
and
[REDACTED] SEE #1
will
be
there
too
We
can
try
to
get
[REDACTED]
but
at
this
late
notice
may
be
hard-
do
you
think
we
need
her?
I'll
try
to
give
her
a
call
now,
if
so

Sent
from
my
iPhone

On
Sep
[REDACTED]
2019,
at
7:39
PM,

[REDACTED]

[REDACTED]

wrote:

You
can
put
a
placeholder
out
there

Sent
from
my
phone

On
Sep

[REDACTED]
2019,
at
7:38
PM,

[REDACTED]

wrote:

I
can
let
[REDACTED]
know
that
we
need
him
to
come
in,
too

On
Sep

[REDACTED]
2019,
at
7:37
PM,

[REDACTED]

wrote:

[REDACTED]
can
anyone
from
your
dept
come
in
tomorrow
since
folks
were
on
standby?

On
Sep

[REDACTED]
2019,
at
7:34
PM,

[REDACTED]

wrote:

Thank
you
[REDACTED]
and
perhaps
[REDACTED]
were
going
to
be
here
We
should
I
think
have
an
[REDACTED]

staff
person
at
[REDACTED]
and
at
least
one
at
[REDACTED]
besides
PEP
I
will
wait
on
giving
your
cell
until
he
does
another
site
visit
(he
is
going
tonight
or
early
tomorrow)
and
we
get
confirmation
that
this
is
the
final
plan

Sent
from
my
phone

On
Sep
[REDACTED]
2019,
at
7:21
PM,

[REDACTED]
wrote:

Ok,
I'll
plan
to
be
on
site
at
1PM
unless
I
hear
otherwise
from
you.
[REDACTED]
I
have
[REDACTED]
Staffer #4
number
-
does
he
have
my
cell?
[REDACTED]
Do
you
want
anyone
else
other
than
PEP
to
assist
with

directions?

Thanks,

[REDACTED]

On
Sep

[REDACTED]
2019,

at
7:10
PM,

[REDACTED]

wrote:

[REDACTED]
will
be
on
site
tomorrow
too
in
case
coordination
with
tenants
etc
is
needed

From:

[REDACTED]

Sent:
Friday,
September
[REDACTED]
2019
7:06
PM

To:

[REDACTED]

Cc:

[REDACTED]

SEE #1

[REDACTED]

Subject:

Re:
Current
Plan
for
Tomorrow's
Governor's
Event

Hi

[REDACTED]

Thank
you
for
these
details

[REDACTED]

would
you
prefer
to
be
the
Operations
contact
on
site
tomorrow
or
should

I
be
there
by
1
PM?

Thanks,

█

On
Sep
█
2019,
at
6 50
PM,

█

wrote:

Sorry,
realize
I
didn't
complete
my
sentence
about
timing
The
Governor
will
be
picked
up
at

█

at
2
pm

The
█

boat
will
arrive
earlier
Don't
know
what
boarding
time
will
be
for
the
town

█
yet

-
depends
on
whether
they
decide
to
have
the
boats
go
to

█

first
or
directly
to

█

I
would
think
everything
would
be
done
by
3:15
at
the
absolute
latest,
but
that's
a
guess

From:

[REDACTED]

Sent:
Friday,
September

[REDACTED]
2019
6:36
PM

To:

[REDACTED]

SEE #1

[REDACTED]

Cc:

[REDACTED]

Subject:
Current
Plan
for
Tomorrow's
Governor's
Event

Importance:
High

We just got off the phone with the Governor's office. The current plan, not 100% confirmed on their end, is as follows:

1 Governor will board the

[REDACTED]

tender at

[REDACTED]

The Governor will need to drive through the garage to access the western end of the

[REDACTED]

The Governor's advance person

seems
to
be
coordinating
with

[REDACTED]
on
this
aspect
We
will
want
to
make
sure
PEP
is
on
the
alert
but
we
do
not
need
5
people
at

[REDACTED]
We
probably
want
a
person
or
two
to
direct
at
most

2
Two
boats
plus
possibly
one
small

[REDACTED]
boat
will
be
at
the
town
at

[REDACTED]
and
invited
guests
will
board
from
there
They
will
either
motor
to

[REDACTED]
to
meet
the
Governor
or
go
directly
to
the
western
end
of

[REDACTED]
where
the
[REDACTED]
will
occur

3
All
boats
including
the

[REDACTED]

with
the
Governor
will
return
to
the

[REDACTED]
town
[REDACTED]

4
People
will
disembark
and
go
to
the

[REDACTED]

for
the
press
event
They
want
the
event
to
be
beyond
the
reach
of
the
general
public
They
want
to
screen
the
sides
of
the

[REDACTED]

with
green
mesh
or
something
so
that
the
Governor
at
his
podium
can
make
the
announcement

5
The
exact
timing
of
all
of
this
may
change,
but
I
expect
the
G

We
should
have
some
PEP
presence
at

[REDACTED]
on
the
south
side,
and
the
general

public
may
gather
somewhat
to
watch
the
boats
from
the
western
end
of
[REDACTED]
so
be
aware
of
that
but
I
can't
imagine
many
people
would
swarm
there

[REDACTED]
is
coordinating
with
Citi
and
[REDACTED]
to
get
access
to
the
landing
and
is
also
coordinating
with
the
garage
and
maybe

[REDACTED]
The
Governor's
advance
people
will
be
on
site
obviously,
press
vehicles
may
arrive,
and
we'll
need
a
principal
operations
contact
for
them
for
tomorrow
[REDACTED]
is
that
you?

From:

[REDACTED]

Sent:
Friday,
September

[REDACTED]
2019
5:35
PM

To:

[REDACTED]

SEE #1

Subject:

is
back
in
play!!!

Importance:
High

They
are
talking
about
doing
a
press
conference
here
and
about
using
our
again!!!!
can
you
come
over
here
if
you
are
still
here?



EXHIBIT
4



5/21/21, 10:24 PM

Tap to return to call

43:53

Keeping [redacted] and co in my thoughts!

16:25

Jealous about [redacted]

16:25

And [redacted] cool about the Rhine River

16:25

I was at a press event all day where Governor Cuomo threw [redacted] into the [redacted] and shared a big plan for [redacted]

16:27

Took a pic together and Gov Cuomo patted me on the butt YUCK

16:27

What?!?

16:33

[redacted] that's horrifying

16:33

It's actually sexual assault without a woman's consent and he could lose his job for that.

16:34

Not ok and not at all funny

16:34

Did you tell anyone?

16:34



EXHIBIT

5



5/21/21, 10:24 PM

Tap to return to call

43:57

Not ok and not at all funny 16:34

Did you tell anyone? 16:34

Oh it's awful. I immediately told my boss. I mean what ridiculousness

16:35

Horrifying and I'm so sorry that happened to you.

16:35

What was your boss' response? 16:35

I was just surprised 16:36

Like HUH? 16:36

And immediately turned to [redacted] and said - he just patted my butt.

16:36

Of course, people professionally don't act like that so you wouldn't expect it

16:36

What did she say though or do? 16:36





5/21/21, 10:24 PM

Tap to return to call

44:01

Nothing really. We were in the thick of a lot of people. Anyways just crazy in this climate that men in power do this alllll the time 16:40

THAT is really bad!!!!!! 🤔 16:40

Ok- so she has handled this completely wrong. As a boss she should actually meet with you, take notes on what happened, talk to you about how you are feeling, etc. If a female boss in a position of power is going to ignore something hugely inappropriate like that then she shouldn't be in her position 16:42

I have read about four articles this week re how sexual abuse cases and domestic murder cases are actually increasing here in the UK. It's just shocking. And in the year almost 2020 to think a mayor thinks it's appropriate to pat a woman's behind!?!? 16:43






5/21/21, 10:24 PM


Tap to return to call

44:05

 16:44

You've got different ways to handle this  It's not for me to tell you how. What I will say is that I'm really sorry this happened. It's completely and utterly wrong and should never have happened

16:44



I agree 16:52




Are you ok? 16:53



Yes. 16:55




Love you  17:00

Oh  just seeing this.... I'm sorry

17:00 ✓

That's horrible and shouldn't be taken lightly

17:00 ✓







5/14/21, 9:40 PM

All Media

Of course I do [REDACTED]! Love you! 11:04

[REDACTED] SEPTEMBER 2019

Do u think the governor touched u intentionally? 18:03 ✓✓

Or was it a graze? 18:03 ✓✓

Or a clear butt touch 18:03 ✓✓

It seemed intentional or like an intentional pat, but maybe the butt was a mistake 18:04

Hmm...just asked because (and he prob hmisna Creep dude) but it takes balls to do that when there are cameras there. I mean what the hell is he thinking even getting close to your butt? 18:05 ✓✓

Yeah. Who knows. It was the conclusion of our photo. V bizarre 18:06

He prob did it intentionally sad to say 18:08 ✓✓

Sorry [REDACTED] 18:08 ✓✓

He looks creepy 18:09 ✓✓

EXHIBIT 6



SEE #1_00009





SEE #1 < [REDACTED] @gmail.com >

Governor Cuomo Inappropriate Touching

SEE #1 [REDACTED] Sun, Sep [REDACTED], 2019 at 7:56 PM
To: SEE #1 [REDACTED], SEE #1 [REDACTED] @gmail.com" SEE #1 [REDACTED] @gmail.com>

On Saturday, September [REDACTED], around 230pm Governor Andrew Cuomo led a press release about a commitment to restore four acres of [REDACTED] in [REDACTED]. After his recorded talk on the west side of [REDACTED] [REDACTED] and other representatives from major [REDACTED] were shaking Governor Cuomo's hand and taking pictures. My boss and I introduced ourselves and said thank you to Governor Cuomo and he suggested that we, as [REDACTED] representatives, take a picture with him. My boss and I stood on either side of Governor Cuomo and we took a couple pictures with the Governor's photographer. When departing from taking the picture, Governor Cuomo tapped my butt cheek two times (to quick pats) with what felt to be the palm of his hand. I was very surprised and so as I made a few steps forward with my boss, [REDACTED] I told her immediately that Governor Cuomo patted my butt. She looked confused and maybe said "what?" or "huh?" so I repeated myself and said, "The governor just patted my butt." She was then silent and just looked at me, while [REDACTED] from [REDACTED], who happened to be very close and seemed to hear me made an uncomfortable laugh. I then felt a lot of emotions around Cuomo's inappropriate touching of my body, mostly shock and anger, but I didn't say anything further about his touching and continued to mingle / say thanks and goodbyes to other [REDACTED] partners.

-SEE #1 [REDACTED]
9/ [REDACTED] /19

Sent from my iPhone





SEE #1 <[REDACTED]@gmail.com>

FW: Google Alert - [REDACTED]

SEE #1
To: SEE #1 <[REDACTED]@gmail.com> SEE #1 <[REDACTED]@gmail.com>

Thu, Apr 22, 2021 at 1:01 PM

From: SEE #1
Sent: Monday, September [REDACTED] 2019 12:25 PM
To: [REDACTED]; [REDACTED]
Cc: [REDACTED]
Subject: RE: Google Alert - [REDACTED]

Hi,

I submit ed a request for the pictures. When I receive, I will circulate the link.

- SEE #1

From: [REDACTED]
Sent: Monday, September [REDACTED] 2019 8:50 AM
To: [REDACTED]
Cc: [REDACTED]; SEE #1
Subject: Re: Google Alert - [REDACTED]

Yes, we got more play that I would have guessed. Thanks for following up on pix. Good luck today.

Sent from my phone

On Sep [REDACTED] 2019, at 8:47 AM, [REDACTED] wrote:



Looks like we got lots of good coverage from Saturday with [REDACTED] nicely represented throughout as far as I see! On a side note, there were also some shots directly with [REDACTED] employees and the Gov that his press person took and should be available on his press link (I have the address in my office). We will see about downloading those today and maybe we can do a little spinoff blog in our website.

Unfortunately, I have a [REDACTED] this morning that I couldn't get for a more convenient time so I'll miss Senior Staff today. If SEE #1 is in by 9:30, I'll ask her to join the meeting.

Thanks,

[REDACTED]

Sent from my iPhone

Begin forwarded message:

From: Google Alerts <googlealerts-noreply@google.com>
Date: September [REDACTED] 2019 at 5:04:02 PM EDT
To: [REDACTED]
Subject: Google Alert - [REDACTED]

Google Alerts

[REDACTED]
Daily update · September [REDACTED] 2019

NEWS

[Cuomo Initiative to \[REDACTED\] \[REDACTED\] to \[REDACTED\]](#)

NBC New York

Cuomo announced the program Saturday as officials released [REDACTED] [REDACTED] at New York City's [REDACTED]. The governor ...

On [REDACTED], [Cuomo notes state's \[REDACTED\]](#) - Newsday

[Full Coverage](#)



Flag as irrelevant

[Cuomo Dumps \[REDACTED\] As Part Of His \[REDACTED\] Initiative](#)

WCBS 880

... [REDACTED] [REDACTED] at New York City's [REDACTED]. ... of enhanced habitat off the [REDACTED] [REDACTED] [REDACTED].



Flag as irrelevant

[Gov. Andrew Cuomo announces \[REDACTED\] initiative](#)

Albany Times Union

Cuomo reviewed the program at an event in [REDACTED] where [REDACTED] [REDACTED] will be planted to improve water quality and strengthen ...



Flag as irrelevant

[Cuomo drops \[REDACTED\] \[REDACTED\] into the \[REDACTED\] as part of \[REDACTED\] plan](#)

New York Daily News

Once this batch of [REDACTED] takes hold, the project will be extended to more than 50 acres up and down [REDACTED] on [REDACTED], ...



Flag as irrelevant

[Cuomo Plans Push For \[REDACTED\] Restoration](#)

Spectrum News

The plan was unveiled at the [REDACTED] Initiative in New York City at [REDACTED]. "Our new [REDACTED] initiative ...



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4/22/2021

Gmail - Governor Cuomo



SEE #1 <SEE #1@gmail.com>

Governor Cuomo

SEE #1
To: SEE #1@gmail.com, SEE #1@gmail.com>

Thu, Apr 22, 2021 at 12:41 PM

Press event photo

-----Original Message-----

From: [REDACTED]
Sent: Saturday, September [REDACTED] 2019 3:12 PM
To: [REDACTED] SEE #1
Cc: [REDACTED]
Subject: The Line Up

2 attachments



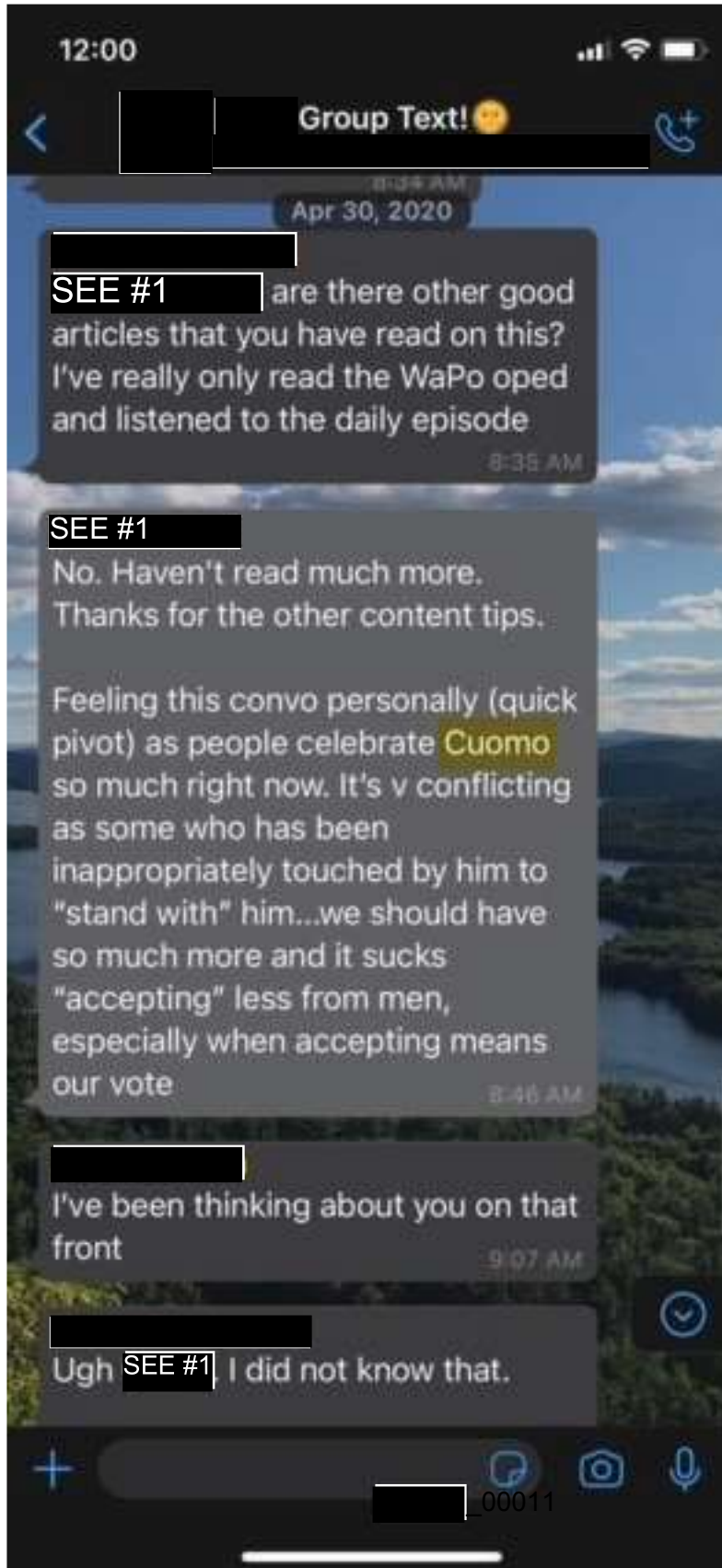
IMG_0258.jpg
727K

ATT00001.txt
1K

EXHIBIT
9

[REDACTED]





SEE #1

Subject: Chat
Location: Does this time work for you?

Start: Tue 3/16/2021 1:00 PM
End: Tue 3/16/2021 1:30 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: [REDACTED]
Required Attendees: SEE #1

