

Memorandum

PRIVILEGED AND CONFIDENTIAL ATTORNEY OPINION WORK PRODUCT

To: File

From: Gibson, Dunn & Crutcher LLP

Re: Governor Christie Interview Memorandum

On February 12, 2014, February 28, 2014, and March 18, 2014, Governor Chris Christie was interviewed by Randy Mastro, Debra Wong Yang, and Alexander H. Southwell of Gibson Dunn. The Governor was not represented by counsel and volunteered to make himself available to be interviewed. All information contained herein was provided by Governor Christie. Governor Christie has not read or reviewed the memorandum and has not adopted or approved its contents.

This memorandum does not contain a verbatim transcript of what was said at the meeting; rather, it is a summary of the discussion that reflects counsel's mental thoughts and impressions and is therefore protected from disclosure by the attorney work product doctrine.

I. Allegations concerning Sandy Aid and Mayor Zimmer

In response to questions about the Governor's Administration's focus on Sandy aid, Governor Christie explained that he established a separate office—the Governor's Office of Recovery and Rebuilding, referred to as GORR—within his Office to coordinate Sandy aid. He established GORR to help administer aid in an orderly and responsive manner. The process of funding reimbursements is complicated and needed a dedicated staff. Specifically, the Office was tasked with handling requests for Sandy aid and the extensive federal and state oversight of Sandy aid, including integrity audits. The Governor's charge to those who worked on the Sandy aid response was that because there were lots of different sources of aid, aid should be distributed quickly and efficiently to the people who need it. The Governor established weekly meetings in order to help those in need to access available funds. He hired Marc Ferzan, a former federal prosecutor, to head up GORR because he was a very effective, "by the book" guy. The Governor commented that he was confident that Ferzan would not be overwhelmed or frustrated by the task at hand, which was extraordinarily complex.

The Governor was involved in some policy decisions concerning the types of recovery programs and projects to pursue. Examples of such decisions included whether to buy out homes in repetitive flood areas and whether to provide aid to elevate homes. The Governor further understood that much of the Sandy aid was based on formulas, and he was not generally involved in issues of where the aid money was distributed after programs were decided upon. On occasion, the Governor would get reports on where the aid money was distributed and any problems with contractors. If something was not working, his GORR team would become aware of it, and sometimes, he would hear how they were trying to fix it. The Governor often commented that aid should be distributed “on the merits.” Governor Christie noted that there was always a concern that there was so much need and not nearly enough money.

When asked about Mayor Dawn Zimmer, he believed he spent more time with Mayor Zimmer than most other Mayors in the State. Governor Christie noted that Mayor Zimmer was one of a few mayors he met with alone in his Office about Sandy aid. He recalled that that meeting occurred in the winter of 2013, likely in February. At that one-on-one meeting with the Governor, Mayor Zimmer had come with a presentation that outlined her plan for flood control for Hoboken, including showing the Governor large maps with proposed flood walls and pumps. That one-on-one meeting with Mayor Zimmer, which occurred in the Governor’s Office, was followed by another larger meeting that Mayor Zimmer had with Commissioners in the Christie Administration at Governor Christie’s behest.

The Governor stated that there is no truth to the allegations that he directed anyone to tie Sandy aid to any political considerations or support for any economic development projects. The Governor made clear that he did not give any such direction and did not send any messages to anyone about tying Sandy aid to economic development projects. The Governor further stated that he did not provide any direction to the Lt. Governor, as alleged, at any time.

A. Rockefeller Development Group

Asked about awareness of the Rockefeller Group development project in Hoboken, the Governor stated that he had only a very general awareness of the Rockefeller Group and that they were attempting to pursue some development in Hoboken. The Governor was aware of the Rockefeller Group from some other projects around the state, including ground-breakings or ribbon-cuttings that he recalls having attended. The Governor recalls that there was another development project in Hoboken involving NJ Transit, but he does not recall or know if he knew the name of the other developer of that project or any other details about the project; he simply refers to it as the NJ Transit project. [NOTE: LCOR is the developer of the NJ Transit project.] The Governor did recall, however, that NJ Transit was frustrated that Mayor Zimmer was not supporting that other project, despite it being a good project. The Governor did not recall from whom he had heard this.

The Governor was not aware, and had no recollection of ever knowing, that Mayor Zimmer took any position adverse to the Rockefeller Group project.

The Governor had no specific recollection of any meetings with any Rockefeller Group executives or lobbyists. He acknowledged that he may have met or seen Rockefeller Group executives at events. He recently saw a photograph of himself and a Rockefeller Group executive at a DayTop Village charity event last year. He had not recalled seeing the executive at that large gathering, but realized that he must have, given the photograph.

The Governor stated that he now knows that Wolff & Samson represented the Rockefeller Group, although he was not aware of that at the time of the allegations at issue. The Governor has not met with Lori Grifa of Wolff & Samson since she left DCA.

Concerning the alleged May 10, 2013 meeting with the Lt. Governor, the Governor did not recall having any substantive conversations with the Lt. Governor at the Senior Staff retreat. The Governor recalled only two interactions with the Lt. Governor at the retreat: first, the Governor recalls singing a song with the Lt. Governor after dinner; second, the Governor recalled going to the kitchen for a snack—he recalled having raspberries—and running into the Lt. Governor in the kitchen and briefly saying hello. The Governor did not recall any conversations at all at that Senior Staff retreat about the Rockefeller Group. And he did not recall any conversations with the Lt. Governor about Mayor Zimmer at the Senior Staff retreat. Nor did the Governor recall any conversation with the Lt. Governor about Mayor Zimmer since May 1, 2013, with the exception of a call from the Lt. Governor after these allegations were made by Mayor Zimmer in January 2014, in which the Lt. Governor assured the Governor that the allegations were false.

The Governor further commented that even if the Rockefeller Group's Hoboken development project were to have been mentioned to him, he would not have known anything about the project. He therefore would not have directed the Lt. Governor to "deliver a message" in Hoboken to Mayor Zimmer, and he did not do so.

In response to a question about whether the Governor was familiar with the NJTV program with Commissioner Constable and Mayor Zimmer, the Governor said that he did not see the program. He did not have any conversations with Commissioner Constable beforehand about the program or about what to say at the program. He also did not ask or direct Commissioner Constable to send "a message" to Mayor Zimmer, as Mayor Zimmer suggested. The Governor noted that he does not have any memory of the event happening, that Commissioner Constable was going, that Mayor Zimmer was going, or that Commissioner Constable would interact with Mayor Zimmer. The Governor first heard about the allegations regarding Commissioner Constable when he read the news about it on the way to Florida in January 2014. At some point after the news report, the Governor got a call from Commissioner Constable, who told the Governor that the allegations were false.

In response to a question about Mayor Zimmer's allegations against Marc Ferzan, the Governor said he had no conversations with Ferzan about delivering any such message to Mayor Zimmer and gave no such direction to Ferzan.

In response to a question about Rebuild by Design, the Governor commented that he cannot recall any discussions with Mayor Zimmer about Rebuild by Design. The Governor had a vague and general recollection that there were three New Jersey proposals in the finals of the competition—one from the shore, one from Hoboken, and the third related to the Meadowlands. The Governor did not recall any prioritization among these three projects. The Governor had no recollection that Mayor Zimmer wanted New Jersey to prioritize Hoboken's project and support only it over the other New Jersey projects, although the Governor did have an understanding that Mayor Zimmer was advocating for Hoboken's Rebuild by Design project. The Governor was aware that a credo of Rebuild by Design was public-private partnerships.

In response to a question about any visits to Hoboken since May 2013, the Governor recalled visiting Carlo's Bakery for an endorsement by a small business group.

In response to a question about a potential endorsement from Mayor Zimmer, the Governor explained that at the end of his February 2013 meeting with Mayor Zimmer, he told her that he was not going to ask that day, but that he may come to ask for her endorsement later, and he asked her to start thinking about that and let him know her views. The Governor thought that he had a good working relationship with the Mayor. The Governor knew the Mayor was concerned about crossing party lines to endorse, in part, because she was up for re-election, and she responded that she couldn't give him an answer. And the Governor said he was fine with that. The Governor had no other direct conversations with Mayor Zimmer about her endorsement, although he understood that the campaign approached her at a later date. He recalled that at some point in the Fall, Mayor Zimmer indicated she might publicly state that she would vote for the Governor but that she did not want to use the word "endorse." At that late date, the Governor had so many other endorsements, and was well ahead in the polls, so he did not see much value in Zimmer's expression of support without an endorsement.

II. Fort Lee Mayor Mark Sokolich

The Governor had no memory of meeting Mayor Sokolich. The Governor knew Mayor Sokolich's name because of the accusations that Mayor Sokolich made. When those accusations came up, the Governor asked Stepien if there was any truth to them. Stepien responded that they had asked in spring 2013 for Mayor Sokolich's endorsement, but that Mayor Sokolich had said that due to business reasons, he could not be publicly supportive. After that, Stepien remarked, they left Mayor Sokolich alone. Stepien commented that, accordingly, he did not understand the allegations concerning retribution against Mayor Sokolich. This information from Stepien made sense to the Governor because he did not

recall being asked to court Mayor Sokolich. After speaking with Stepien, the Governor believed that the news stories were just being stirred by the press or Barbara Buono.

III. Chronology of the George Washington Bridge Events

Governor Christie did not know about any plans or ideas for the lane realignment of the three dedicated Fort Lee lanes at the George Washington Bridge (“GWB”) at any time. Governor Christie had no role in the lane realignment and no knowledge of anyone’s participation in the lane realignment. He did not discuss the lane realignment with any Port Authority or Administration personnel.

While the realignment was in effect, Governor Christie did not recall being aware of the lane realignment or the traffic caused by the lane realignment.

A. 9/11 Memorial Event

For the 9/11 Memorial Event, Governor Christie, at Charlie McKenna’s suggestion, took a ferry across the Hudson River with the New Jersey families of 9/11 victims. Upon arrival in Manhattan, the New Jersey State Police drove the Governor to the arrival site, where he was met by Baroni. Wildstein and Samson joined at some point later. Governor Christie then stood around for a while, waiting for Governor Cuomo to arrive, so that the two governors could enter at the same time, per tradition. During this waiting period, various Port Authority employees were brought over by Baroni and/or Wildstein to take pictures with Governor Christie.

The Governor did not believe that Chip Michaels was there. The Governor said he did not know Michaels well, but he is familiar with Michaels’ family. They were reacquainted in the past few years because their children played hockey. The Governor recently saw Michaels at the hockey rink, where they discussed their children and hockey, including his son’s recent injury. The Governor never discussed the GWB traffic or lane realignment with Michaels.

Mrs. Christie was by the Governor’s side throughout the 9/11 Memorial Event, including the period before the event began. Before the 9/11 Memorial Event began, the Governor recalled that Mrs. Christie asked to use a bathroom, and Wildstein directed her to a large white Port Authority trailer. She went into the van, and then exited, saying that there was no bathroom in the trailer. A female Port Authority Police Department officer, who was possibly Baroni’s driver, then took Mrs. Christie to the bathroom. Otherwise, Mrs. Christie was with the Governor throughout the event.

During the time before the event started, Baroni and Wildstein, along with others, were present for most of the time. The Governor has no specific recollection of conversations with them, other than light banter. Asked whether anyone raised the subject of traffic in Fort Lee prior to or at this event, the Governor responded that he had no such

recollection, and any such mention would not have been memorable to the Governor because traffic issues are a regular occurrence. Asked whether anyone raised Mayor Sokolich with him at the 9/11 event, the Governor responded that he did not believe there was any mention of Mayor Sokolich.

The Governor left the 9/11 Memorial Event early to go to a doctor's appointment in Manhattan. Following that appointment, he went to the West 30th Street heliport, and took the NJSP helicopter south to Trenton. The helicopter flew over the Statue of Liberty and the Verrazano Bridge, and then took a hard right, as it always does.

B. Bill Stepien

Stepien and the Governor did not meet regularly. Stepien was an incredibly hard worker who put in long hours. He would often remain in his office, focused on his work, and rarely venture to the Governor's office. Stepien was also very formal and respectful of the Governor's time. Stepien generally did not drop by to discuss things with the Governor, as others who worked with the Governor at the USAO would do. Usually, the Governor would have to go to Stepien's office if he wanted to speak with Stepien. As of April 2013, Stepien would need an appointment to meet with the Governor because he was no longer a State employee.

C. David Wildstein

The Governor first met Wildstein in 1977, when both were students at Livingston High School and volunteering on Tom Kean's gubernatorial primary election. The Governor and Wildstein attended the same high school, but were not in the same class. The Governor had very little recollection of Wildstein in high school, and believed they did not have significant interaction during that time.

After high school, the Governor recalled that Wildstein was elected to the Town Council, which was notable because he was so young. He also recollected Wildstein's election as Mayor. The Governor read about both of those elections. He also recalled reading that Wildstein took some controversial political steps, including firing a local judge that was the father of a friend—Marty Brenner—in the 1980s. After that, the Governor had no contact with, or any recollection regarding, Wildstein, until around 2000 in the context of the Franks 2000 U.S. Senate campaign. At that time, the Governor was counsel to the George W. Bush presidential campaign in New Jersey. Baroni was Franks' campaign counsel, and Wildstein also worked on the Franks Senate campaign. The Governor interacted directly with Baroni, as they were both counsel to their respective campaigns.

Around the time that he was thinking about getting ready to run for governor, the Governor recalled hearing speculation that Wildstein was "Wally Edge," which made the Governor laugh because he thought it was possible, given that Wildstein is such an "odd

duck.” After the 2009 campaign, DuHaime told the Governor that Wildstein was “Wally Edge.”

D. Port Authority Positions

Upon assuming the Office, the Governor decided to keep Anthony Coscia as Chairman at the Port Authority for a period of time, due to the complexity of negotiations concerning the World Trade Center rebuilding efforts. The Governor discussed the position of Deputy Executive Director with DuHaime, who suggested Baroni for the position. The Governor was reluctant because Baroni sat in a swing seat, but DuHaime made the case that the party could keep the seat, and that Baroni had the necessary smarts and skills. The Governor then decided to name Baroni as Deputy Executive Director, along with the Governor’s appointment of Samson as the Port Authority Chairman.

At some point, someone, possibly Deb Gramiccioni, told the Governor that Baroni wanted to bring in Wildstein and pay him over \$200,000 a year, which she said was too high. The Governor agreed and said that Wildstein’s appointment was acceptable as long as he was not paid too much. While the Governor did not recall the amount discussed, he now understands that Wildstein made \$150,000 per year while at the Port Authority, and so he believed that \$150,000 may have been the amount discussed with Gramiccioni.

As an indication of his lack of connection to Wildstein, the Governor pointed out that Wildstein is not a contact in his cell phone. The Governor commented that his direct contact with Wildstein was when Baroni brought him to meetings.

E. September and October 2013

The Governor did not recall reading the “Road Warrior” piece about the lane realignment.

The first week of September was particularly busy for the Governor. He went to a Sunday football game in Texas, and then to Dallas, San Antonio, and Houston. The Seaside fire was a big deal on September 12. He first learned about the fire when he was interrupted during a Sandy recovery meeting by a message from a journalist. He sent Comella to check out the news, and learned that the fire was out of control. The Governor decided to caravan down to Seaside that night with a group that included Michele Brown, Commissioner Constable, Bridget Kelly, and others. During that time, he had no discussion with Kelly regarding Fort Lee or the lane realignment. The Governor was preoccupied with the fire and what needed to be done to respond to it.

The Governor had no specific recollection of the September 17, 2013, and October 1, 2013 *Wall Street Journal* (“WSJ”) articles, but generally recalled that the WSJ was the lead outlet reporting on this story. He recalled seeing the substance of Foye’s email and an article about it, but was not sure when it was posted—at night or the next day. He was aware that

the articles included claims of violations of law. The Governor had two reactions to the article: (1) it was typical of Foye to write and then leak an email, rather than directly discussing the issue; and (2) the Governor wanted to know what happened. Soon thereafter, the Governor raised the issue with McKenna and/or O'Dowd. At some point thereafter, the Governor thought McKenna came back and told him that Baroni said this was a traffic study, and that Foye was making a huge deal out of nothing. This explanation was consistent with the Governor's understanding of tensions at the Port Authority, and therefore, after hearing this explanation, he was satisfied at that time.

F. November 2013

The Governor next heard about this issue when it was brought to the Governor's attention whether Baroni should appear at a legislative committee meeting without being subpoenaed. The Governor's reaction was that he should appear. The Governor did not listen to or follow the testimony. The Governor did recall asking McKenna how the testimony went, and McKenna told the Governor that it went fine—that Baroni had shared evidence of the traffic study, apologized for not talking to Foye about it, and promised that nothing similar would happen in the future.

Thereafter, the Governor heard about the subpoena to Foye and some employees of the Port Authority. The Governor asked McKenna about the subpoenas, and McKenna told him that it was McKenna's impression that Foye had asked for the subpoena.

G. December 2013

Asked about the decision to ask for Wildstein's and Baroni's resignations, the Governor recalled telling McKenna to ask for Wildstein's resignation, and telling O'Dowd and McKenna to ask for Baroni's resignation, although the Governor did not recall when this was.

The Governor listened to part of Foye's testimony and the other Port Authority professionals while he ate lunch. He recalled that his reaction was that it was clear that Foye disliked Wildstein, but liked Baroni. Wisniewski repeatedly attempted to get Foye to "dump on" Baroni, but Foye did not do so. The Governor also noted that the professional Port Authority employees had told the committee that Wildstein had previously asked about the Fort Lee lane issues, as early as the Fall 2010.

After their testimony, and with the increased press attention, the Governor recalled someone (though he does not recollect who), relaying that Wildstein had said something along the lines of, "I'm not stupid; I got this cleared by the Front Office." The Governor recalled that, in response to hearing that, the Governor asked McKenna what was going on. McKenna talked to Egea, who said she never talked to Wildstein and thought that Wildstein was trying to protect himself. At some point, the Governor also heard (although the

Governor again does not recall from whom) that Wildstein had said that he told the Governor about the traffic study during the period the lanes were closed.

The Governor did recall a telephone conversation with DuHaime about the lane realignment allegations being advanced in the press, which occurred at some point during the week just prior to when Baroni was asked for his resignation, although the Governor could not recall precisely when. In that conversation, DuHaime reported on a recent conversation he had had with Wildstein. DuHaime reported that Wildstein had told him that the traffic study was Wildstein's idea and that Wildstein would take responsibility for it. Wildstein further commented to DuHaime, who repeated this to the Governor, that he (Wildstein) wasn't stupid and would not have proceeded with the traffic study without approval. Additionally, Wildstein told DuHaime that he (DuHaime) needed to know that Kelly and Stepien knew about the traffic study.

The Governor could not recall specifically if DuHaime told him in this conversation that DuHaime had also spoken to Stepien about this, but he does not think that DuHaime did. The Governor recalled thinking that the press and legislature were increasingly focusing on Wildstein and that the Governor wanted to understand what Wildstein was saying and whether he was simply looking to protect himself. The Governor also decided to talk to Stepien.

On the morning of December 12, 2013, there was a breakfast at Drumthwacket for union leaders, which Stepien attended. The Governor had no specific recollection of that event, although typically the breakfast is held in the music room at Drumthwacket, the Governor would come in and speak from the steps, take pictures, and then quickly leave. The Governor did recall that there was no discussion about the Bridge lane realignment at the breakfast, with the Port Authority Police Department, or Bridget Kelly, or anyone else.

The Governor asked Stepien to meet with him after the breakfast to discuss a few issues, and the two met in the dining room following the breakfast. In that meeting, the Governor asked Stepien if he was involved in the lane realignment decision. Stepien denied any involvement. Stepien added that Wildstein would come to him with 50 crazy ideas each week and that Stepien would tell Wildstein that Stepien was not in the government anymore, so Wildstein had to run things by Trenton.

Regarding any conversations with O'Dowd or Drewniak about the lane realignment, the Governor recalled that at some point in December, the Governor walked into O'Dowd's office while Drewniak was there speaking with O'Dowd. The Governor recalled that Drewniak was talking about having dinner with Wildstein, which the Governor found surprising because he did not think that Drewniak and Wildstein were such good friends that they would have dinner together. Leading up to the December 13, 2013 press conference, the Governor knew that when Baroni's departure was announced, the Governor would be asked about the lane realignment. He wanted to address this issue with his senior staff, but

the meeting he called for that morning with the senior staff was also about his concern about “senioritis” in the aftermath of his re-election victory.

During the December 13, 2013 senior staff meeting, the Governor walked in, slammed the door, and stood the whole time. He was agitated and disappointed. He recalled saying “this is a mess, and now I have to clean it up.” He recalled saying that he hoped everyone enjoyed their 38-day vacation, and was pleased with themselves over the 60-percent victory and the TIME magazine cover, but that it was time to get back to work. He said that “the spotlight can turn to a searchlight real quick” and it was time to raise their game. He said that anyone not up to that challenge should tell him. He then pivoted to the Port Authority issue, and said that he now had to clean up the mess. He said that he needed to know everything so that he could clean it up. He said that if anyone had knowledge of or involvement in the lane realignment, they should tell O’Dowd or McKenna in the next 45 minutes—“the confessionals are open.” The Governor said that the staff should not let him go out and say anything that is not true. He delivered this message loudly and made eye contact with everyone. He then went to his desk, and everyone filed out silently. O’Dowd and McKenna stayed behind and told the Governor they would talk to the staff.

After that morning meeting, but before the press conference, O’Dowd and McKenna told the Governor that all senior staff denied knowledge of or involvement in the lane realignment. The Governor generally recalled that O’Dowd reported that Kelly had an email about the lane realignment while it was going on, which was consistent with Kelly claiming not to have had any prior knowledge of the lane realignment. Thus, the Governor never had any idea or indication that Kelly was involved in the lane realignment. He thought of Kelly as Stepien’s deputy. She was temporarily put in the role of running IGA until it was known whether she could handle it, and he believed part of the scope of the job was taken away from her.

Prior to the press conference, the Governor also called Stepien, inviting Stepien to the press conference and telling Stepien that he was not happy with anyone’s performance lately. The Governor did not recall if Stepien attended the press conference.

After learning from O’Dowd and McKenna that all senior staff denied knowledge of, or involvement in, the lane realignment, the Governor went confidently out to his press conference, knowing that O’Dowd and McKenna had been looking at this issue.

The Governor recalled that O’Dowd had reported that Kelly was crying when she had said that she had nothing to do with the lane realignment, claimed she had no emails about it, and swore up and down that she had no knowledge about it. O’Dowd expressed concern because Kelly was so emotional. The Governor did not recall when O’Dowd expressed this concern, but thought it was after the December 13, 2013, press conference. The Governor was not surprised that someone, particularly an individual like Kelly, might be nervous or

upset in this situation because O'Dowd's inquiries can be very direct, intense and prosecutorial-like, given his background.

The Governor also recalled getting a call from Stepien on December 14, 2013, while the Governor was on his way to a doctor's appointment. Stepien told the Governor that Kelly was fragile and worried. The Governor responded that we would keep an eye on her. He added that she should not be worried because no one had anything to do with the lane realignment. Stepien responded that was right.

The Governor did not recall Gramiccioni telling him anything about what she heard from Baroni.

H. January 2014

After working out on January 8, 2014, the Governor received a call from Comella regarding a story in *The Record* that she described as "bad." He read the article on his iPad, which made him sick to his stomach. Mrs. Christie called, and the Governor confirmed that he had seen the article and would talk to her later. He believed that he then called O'Dowd, and told him to gather those he would need at Drumthwacket. On the drive down to Drumthwacket, the Governor thought he spoke to DuHaime. Meeting at Drumthwacket were O'Dowd, Porrino, Egea, Brown, Comella, Matey, the Governor's brother, and at some point, DuHaime, Palatucci, and Samson. Others may have been there as well. The Governor recalled McKenna being away.

When the meeting started, the Governor recalled being nervous because he did not know who else might be involved. He got emotional, and with tears in his eyes, asked if anyone else had anything else to do with the lane realignment, because he could not get sand-bagged again. One-by-one, each person denied involvement. Together, they then turned to where to go next. When Samson arrived, which was later in the day, the Governor took him aside and asked if he knew anything about the lane realignment allegations and Samson responded that he did not.

The Governor and his advisors discussed whether his team should talk to Kelly or Stepien. They concluded that they should not talk to Kelly because she had a potential legal problem. There was no conversation about talking to Baroni or Wildstein. They decided that they needed to talk to Drewniak, given the documents that had been publicly disclosed, and called him over to Drumthwacket in order to question him about any knowledge or involvement in the lane realignment he may have had. If Drewniak had any, he would have been fired. He was questioned for a while by Porrino and Matey, and explained that he had no involvement in this lane realignment decision.

The Governor concluded that Kelly had to be fired. He recalled not being sure about the nature of Stepien's involvement in the lane realignment, but felt it was better to sever ties with both at the same time. The Governor decided to sever ties with Stepien in part because

of the language Stepien used in the released emails, but also because he felt he could no longer trust Stepien. The Governor instructed DuHaime to tell Stepien and to find out if he had a relationship with Kelly. DuHaime argued not to get rid of Stepien, but the Governor said that Stepien needed to go.

The Governor recalled that DuHaime left to talk to Stepien and, after a while, returned and reported to the group. DuHaime reported that Stepien was upset, and claimed he did nothing wrong and did not deserve to be thrown under the bus. DuHaime also reported that Stepien acknowledged a relationship with Kelly, but said that it was over. DuHaime further reported that Stepien was angry that he could not tell the Governor his side of the story in person. DuHaime explained that Stepien felt wronged because nothing in the released emails or other evidence suggested his involvement in the lane realignment decision.

The next day, the Governor went to Trenton in the morning. He then held the press conference, while exhausted, answering all questions. Only after coming back did he realize that the press conference lasted nearly two hours.