

STATE OF NEW YORK ::
DIVISION OF HUMAN RIGHTS

ERIC F. COPPOLINO,

Complainant

- vs -

RADIO KINGSTON, WKNY 1490-AM NEW YORK,

Respondent

STATE OF NEW YORK, COUNTY OF ULSTER

ERIC F. COPPOLINO, duly swears [or affirms], deposes and states:

1. I am an internationally known writer, reporter, presenter and broadcaster who until recently has had an impeccable reputation for both my work product and my personal conduct. On April 20, 2018, I was fired by respondent RADIO KINGSTON. On May 7, 2018, I notarized a complaint and affidavit, to be sent to the New York State Division of Human Rights (hereinafter, the Division or DHR), alleging sex discrimination and hostile workplace against respondent RADIO KINGSTON, my former employer. I mailed the complaint on May 10, 2018 [APPENDIX A].
2. Respondent RADIO KINGSTON/NOVO FOUNDATION replied on June 18, 2018, and said that the decision to fire me was made to protect the image and reputation of both RADIO KINGSTON and the NOVO FOUNDATION, which funds the station exclusively [APPENDIX B].
3. Respondent, in its pleading, states that the truth is immaterial, and claims that only its image and reputation matter. Respondent is therefore relying on rumors, assumptions and worst of all, its own preexisting stereotypes. We know this because RADIO KINGSTON/NOVO FOUNDATION's response contains no evidence beyond hearsay.
4. Peter Buffett, founder and co-chair of the NOVO FOUNDATION, sits on the board of directors of RADIO KINGSTON, which voted to fire me on April 17, 2018. Upon information and belief, my firing from RADIO KINGSTON/NOVO FOUNDATION was ordered personally by NOVO's co-chair, Peter Buffett.
5. **(a) My firing by respondent RADIO KINGSTON/NOVO FOUNDATION is specifically based on the fact that I am a man. For example, respondent, its employees/agents, and respondent's attorneys, all refer to me as a "Weinstein."**

(b) This assertion amounts to saying that I am guilty of serious and multiple criminal acts. However, their usage of this libelous statement, given the actual claims made, is more indicative of "a typical man who misbehaves." This is inherently sex discrimination. Were the roles reversed and I were a woman, I never would have been fired, nor would I be in this position. To give another example, if there is such a thing as a "town pervert," a woman does not come to mind. A man in an overcoat comes to mind.

(c) My firing by respondent RADIO KINGSTON/NOVO FOUNDATION stems from retaliation, led by two of its own employees, against an article I wrote that specifically objected to the illegal and discriminatory firing of men.

(d) The article was published in the February 2018 edition of Kingston-based *Chronogram* magazine, titled "Take a Step Back." [EXHIBIT 1]. The article was a commentary on the "Me Too" movement, wherein I objected to men being taken out, called for due process for men accused of misconduct, and called for support for both male and female abuse survivors. At the bottom of this fire storm is retaliation for an article by me, opposing and objecting to illegal discrimination based on sex, for which I was retaliated against by my employer, the respondent, and its employees/agents.

(e) Making similar arguments has subjected other writers to attack, including novelist Margaret Atwood (*A Handmaid's Tale*), whose advocacy for due process I quoted in "Take a Step Back." However, in retaliation for what she wrote, Atwood was called a bad feminist -- not a sexual predator. In this environment, it's impossible to accuse a woman of being a sexual predator.

6. Respondent RADIO KINGSTON/NOVO FOUNDATION's employees Julie Novak and Hillary Hoffman Harvey, and others, retaliated against me, beginning on April 4, 2018, by claiming publicly on Facebook that I was a serial sexual predator on the order of Harvey Weinstein. From there, the discussion gathers momentum rapidly. Until that time, there had been no discussion of any purported misconduct by me, sexual or otherwise. RADIO KINGSTON/NOVO FOUNDATION fired me based exclusively on rumors that its own employees started [EXHIBIT 2], [EXHIBIT 2A] and [EXHIBIT 3]. Respondents conducted no structured investigation prior to my firing, in effect turning a blind eye toward Novak and Harvey and, constructively, endorsing their activities, and accepting rumors and hearsay as "truth" -- evidence of prejudicial thinking.

7. As I warned was possible in "Take a Step Back," respondent's employees Novak and Harvey waged a successful campaign to have someone, specifically a man, fired using "guilt by accusation," **which is based on sex stereotyping -- i.e., a "typical man" -- so typical, one need not bother investigating, especially if the truth does not matter. Respondent states that it's OK for them to just guess that I probably did some of what was claimed.**

8. RADIO KINGSTON is an internet radio station, as well as terrestrial; **our shared "work environment" is the online environment, where the majority of listeners access programming, where much work is done, and where the programs are distributed and promoted. The hostile work environment is that of the internet.** These malicious, hostile rumors were intentionally spread on Facebook, by my fellow program hosts, to do maximum damage.

9. Respondent's false, malicious and reckless accusations were propagated mainly on two areas of Facebook: the personal timeline of respondent's employee Julie Novak (who is also co-founder of the TMI Project, a prominent participant on the local nonprofit/activist scene) and the Hudson Valley Feminists group on Facebook. These rumors spread worldwide; and, as a result, in mid-June I was removed from the faculty of the international Kepler Conference, a scientific conference taking place in January 2019, where I was due to teach as a writing instructor.

10. In my original complaint to the Division, I presented evidence that respondent RADIO KINGSTON/NOVO FOUNDATION had fired me on April 20, 2018 based on those false rumors and with no other cause. Respondent in its reply ignores the fact that at the time of its filing, I was vindicated of all wrongdoing by a former federal prosecutor, engaged by a neighboring business, who conducted an extensive investigation into this matter.

11. My RADIO KINGSTON/NOVO FOUNDATION program, Planet Waves AM/FM, began in 1996 as a show on Radio Woodstock (when and where I first met RADIO KINGSTON station manager Jimmy Buff), continued as a locally promoted podcast called Planet Waves FM in 2010, became affiliated with the Pacifica Radio Network in 2014, and moved to RADIO KINGSTON in early 2018. All three incarnations of my program have the same basic formula of discussing sexuality, astrology and news analysis.

12. RADIO KINGSTON/NOVO FOUNDATION station manager Jimmy Buff, who has followed my work for decades, and with whom I have many mutual acquaintances and business associates, said I was a "no-brainer" to be hired for a program when WKNY-AM became RADIO KINGSTON, meaning he felt that I was an obvious person to have a program as the station's new format was rolled out. For me, it was the fulfillment of a dream to be on the public airwaves again.

13. As of today, the abovementioned rumors, spread by the efforts of RADIO KINGSTON/ NOVO FOUNDATION employees, have resulted in my firing from two additional long-term professional relationships: one with the OMEGA INSTITUTE (respondent in a parallel complaint, for which I had worked for 10 years); and the other with *Chronogram*, a magazine I had served, as its most prominent writer, every month for 22 years (265 consecutive months).

14. Others involved in this movement, started by respondent's employees Novak and Harvey, have threatened to contact the New York *Daily News*, where I am the daily horoscope columnist; and have contacted Hearst Corporation, where I have been recently employed by *Marie Claire*, in an attempt to get me fired [EXHIBIT 4].

15. On Tuesday, June 26, 2018, I was interviewed in Manhattan by an organization that wanted to bring me to Chile to teach a self-actualization workshop for women. At the end of the interview, in the spirit of full disclosure, and to protect the business interests of my potential client, I informed them that respondent RADIO KINGSTON/NOVO FOUNDATION, and its employees Novak and Harvey, had falsely and maliciously accused me of sexual misconduct.

The Environment Where this is Taking Place

16. Most of the discussion has been set on Facebook, though centered around a locale -- Kingston, N.Y., a rural city of 23,000. Functionally, a small fraction of that number comprise the social, creative and activist scene: I would estimate 200 at most, and there is a strong "in-group" mentality. Because I tend to write about topics some people consider controversial and others consider relevant, I've been a prominent member of the community since shortly after arriving in 1989. Additionally, articles about my reporting have appeared throughout the years in local daily and weekly newspapers [EXHIBIT 5], in the Associated Press [EXHIBIT 6] and in *The New York Times* (most recently, last November) [EXHIBIT 7].

17. When I became a columnist and horoscope writer for *Chronogram* magazine in 1996, due to the popularity of my column (which quickly grew to international proportions), I became this small community's most recognizable writer. My horoscope comes with an essay that often covers subject matter related to the intersection of sex and politics, and other sensitive points. [EXHIBIT 8]

17A. Mostly due to my workload, for the past 11 years since returning from an extended trip abroad, I have spent most of my time within a six-block radius, eating in a few small cafés and walking back and forth between my two business locations (one of which has a residence attached), where I spend 90% of my time [EXHIBIT 9].

18. During my 29 years in, or involved with, this community, I have worked and co-created with many women -- as clients, collaborators, employees and healing practitioners -- who are conspicuously absent from this discussion. It is physically and factually impossible that I could be the person that RADIO KINGSTON/NOVO FOUNDATION characterizes me to be. Indeed, respondent strives to reverse my entire identity, and all that I stand for. No trace of what they claim about me can be found anywhere in my vast body of work, which is

ardently woman-friendly and co-produced by an entirely female editorial team at Planet Waves, Inc.

19. Throughout this discussion, women repeating rumors about my alleged behavior and purported character flaws as a man -- complaints which first commenced this past spring, after "Take a Step Back" was published -- characteristically **1.** Do not know me personally and **2.** Begin the discussion by complaining about my writing, and soon after develop into how I should be fired from my jobs as a writer and broadcaster, treatment so far reserved only for accused men (as I described in "Take a Step Back").

20. If there is an actual safety concern about a man, this does not follow logically; getting him fired is not a solution to anything unless they are a danger at work. If a man were a danger to his community, the first priority would be the safety of the community. His employment situation would be incidental or irrelevant, and presumably a distraction from some danger, assuming it existed.

Repeated Comparisons to Harvey Weinstein

21. On April 4, 2018, RADIO KINGSTON/NOVO FOUNDATION employee, and one of its most venerated program hosts, Julie Novak, wrote publicly, "But #timesup for our local Weinstein," and openly called for my firing and replacement by another astrologer [please see **EXHIBIT 2A**]. A "Weinstein" is specifically a slur that pertains to men only. One cannot call a woman a "Weinstein." The "timesup" movement is about getting men fired as punishment for their alleged transgressions, as men.

22. (a) On April 7, 2018, respondent RADIO KINGSTON/NOVO FOUNDATION's employee Hillary Hoffman Harvey claimed that I was the "Hudson Valley's Weinstein" [please see **EXHIBIT 3**] and called for a "reckoning," a word that in the parlance of the "Me Too" movement means having a man removed from his position as punishment for his alleged sexual misconduct. "The Reckoning" was also the title of a live community event in late January that Harvey coordinated between respondent RADIO KINGSTON/NOVO FOUNDATION and *Chronogram*. My article "Take a Step Back," critiquing the tactics of Me Too and calling for due process and the fair treatment of male and female survivors, came out less than a week later.

(b) In [**EXHIBIT 3**], Harvey identifies herself on April 7 as an employee and agent of the respondent; and as an activist who set up the partnership between respondent and *Chronogram*, where at the time she served as "editor-at-large," editing a news section. She also serves respondent as a news reporter and host of a weekly public affairs program. Then she announces that she wants to put together "stories" about me personally, and for the first time publishes the "Me Too Kingston" email address for that purpose, which she monitors. She tags respondent RADIO KINGSTON to show her professional affiliation with the radio

station. This is an admission of her multiple, conflicting roles. Notably, there has not been one other person identified as a target of "Me Too Kingston."

23. In the use of the word "Weinstein," Novak and Harvey were referring to the former male movie producer who 1. Used his position to play "casting couch," to pressure female actresses into sex in exchange for movie roles; and 2. Has been accused by approximately 92 named women variously of sexual assault, sexual harassment, sexual abuse, rape, unlawful imprisonment, coercion by threat of destroying their careers, paying hundreds of thousands of dollars in hush money, and manipulation of the Manhattan District Attorney's office through campaign contributions to Cyrus Vance, Jr. It took pressure from the governor to get the Manhattan DA's office to move against him.

24. On May 25, 2018, Weinstein was charged by the New York County District Attorney's office with "rape, criminal sex act, sex abuse and sexual misconduct for incidents involving two separate women," according to the BBC, and is currently free on \$1 million bond and facing life imprisonment.

25. In the contemporary world, the name "Harvey Weinstein" is associated with pure evil, specifically that which is **perpetrated by men**; association with him would make anyone shun or actively fear such a man, and could easily create a public outcry. And that was the intention of the respondent and its agents, Novak and Harvey.

Radio Kingston/Novo Foundation Claims Truth is 'Immaterial'

26. On June 20, 2018, I received the response to my DHR complaint from RADIO KINGSTON. This is an unverified response, which offers no sworn affidavits, witness statements, corroborating evidence, or evidence of respondent's many hyperbolic claims of my alleged misconduct. They do not specifically refute any of my statements of fact. Their response, of itself, illustrates and demonstrates the major points I make in my complaint.

27. For the purposes of this proceeding, RADIO KINGSTON/NOVO FOUNDATION has affirmed all of the factual claims that I have made in my complaint.

28. (a) In its response, RADIO KINGSTON/NOVO FOUNDATION has continued the same pattern of name-calling, innuendo, false accusations and defamation per se, following along with its employees Novak and Harvey, including an exhibit with its response to a Facebook post calling me a "Weinstein," with an arrow pointed toward the name. In so doing, they are taking full ownership of that epithet, and, without any justification or substantiation for such a claim -- indeed, knowing it is patently false -- are using it as rationalization for my dismissal -- based on protecting their image, as they admit. In this exhibit, respondents openly admit their decision to terminate me was based on prejudice and opinion, not on facts [EXHIBIT 10].

(b) It is widely known locally, and far beyond, that I have worked internationally as a professional erotic photographer, model, keynote speaker and workshop presenter. This is known to my employers, staff members and potential employees, as well as to my readers, my clients and the public. My photo studio, Book of Blue LLC (a subsidiary of Planet Waves, Inc.) moved from Brussels to Kingston in August 2007, and was located from 2008-2017 in a storefront in the main business district of Kingston. (Please see paragraphs 82-88.) The arrival of Book of Blue LLC from Brussels was announced in the Kingston *Daily Freeman*.

29. In an apparent attempt to be inflammatory and disparage my professional activities, RADIO KINGSTON/NOVO FOUNDATION and its attorneys falsely and maliciously refer to me as the "town pervert."

30. In its response, respondent RADIO KINGSTON/NOVO FOUNDATION's attorneys write, **"Whether Coppolino engaged in some, all, or none of the conduct alleged by his accusers is largely immaterial."** This is an open admission of respondent's prejudicial thinking, and its actual malice and reckless disregard for the truth or falsity of its own accusations -- and its willingness to twist known facts to suit its narrative.

31. Respondent RADIO KINGSTON/NOVO FOUNDATION fails to admit that the most prominent "accusers" are two of its own female employees, nor does it admit that many others have been recruited or provoked by those employees. Further, by stating that the truth is "immaterial," respondent RADIO KINGSTON/NOVO FOUNDATION admits its guilty knowledge or suspicion that the claims are false.

32. Respondent's claiming that the truth is immaterial demands an evidentiary investigation of the veracity of all claims made by respondent RADIO KINGSTON/NOVO FOUNDATION, the origins of those claims, their timing, and all of the facts surrounding my firing.

33. Respondent RADIO KINGSTON/NOVO FOUNDATION described me in its response as, "not just any employee. He is one of the faces of the station -- on-air talent hosting a weekly radio show." The same applies to Novak and Harvey, who are both prominent on-air presences and members of our small community.

34. Respondent RADIO KINGSTON/NOVO FOUNDATION, and its attorneys -- who are officers of the court -- openly reject the foundational principle of American law, and the Common Law: the presumption of innocence. They further attempt to establish a standard other than truthfulness and documented proof, thereby attempting to immunize themselves against their own malicious, false and defamatory statements.

35. Respondent's attorneys further assert, based on the undocumented, false and malicious claims they are depending on, **initiated and disseminated across**

the internet by respondent's own employees, that I am the one who they think should be charged with sexual harassment.

36. Respondent's attorneys then assert: "Radio Kingston has a stellar reputation within the Hudson Valley, and no law requires the station to have that reputation besmirched by maintaining an unwanted ongoing association with an at-will employee. And Coppolino is not just any employee. He is one of the faces of the station -- on-air talent hosting a weekly radio show. His bad behavior negatively impacts his public image, which both devalues his services and casts a negative light on his employer, Radio Kingston. It is industry standard for a media company to discharge talent who become involved in any situation which brings that talent into public disrepute, or which justifiably shocks, insults or offends a significant portion of the community."

37. Respondent RADIO KINGSTON/NOVO FOUNDATION, by its language in the paragraph above, attempts to persuade the Division that the malicious rumors spread by its own employees are true; yet it fails to admit that said employees, Novak and Harvey, intentionally spread these false rumors, specifically to instigate my removal from four hard-earned jobs.

38. Respondent further claims in its unverified response, "Radio Kingston, however, did not reflexively terminate Coppolino on the basis of the growing public condemnation of Coppolino. Rather, starting within a month after publication of the Chronogram article, Radio Kingston obtained independent and in some cases first-hand evidence of Coppolino's sexual misconduct -- including from its own personnel" [emphasis added]. In fact, respondent's "information" came from a rumor campaign on Facebook started by its own employees Novak and Harvey, as part of their campaign of illegal workplace harassment and discriminatory behavior.

39. Respondent RADIO KINGSTON/NOVO FOUNDATION hereby admits that publication of my February 2018 article on the "Me Too" movement, "Take a Step Back," directly coincides with this coordinated web of retaliation.

40. Respondent's Board of Directors fired me less than two weeks after the initial rumors were spread by its own employees. It conducted no formal investigation, and provides no evidence of the "sexual misconduct" that it claims happened, nor does it even describe it. All of its claims are based exclusively on hearsay, without specifics, as if we are to presume respondent is acting in good faith and somehow above the usual rules of process and evidence.

41. Respondent fails to provide written complaints from other employees, sworn affidavits from employees or management, examples of any conduct alleged, evidence of a review or disciplinary process, or evidence of warnings. Nor does it offer its standard disciplinary policy or sexual harassment policy, which might indicate a coherent procedure for such situations and help us see whether

that procedure was followed. Respondent's attorneys seem to expect this administrative process to proceed on the basis of hearsay alone.

42. If they even existed at the time, purported complaints of alleged mistreatment of station employees were omitted from the agenda of an informal April 8, 2018 meeting between me and station manager Jimmy Buff, who only said that he believed I allegedly "make women uncomfortable." In fact, at that time, when I asked directly, he told me there were no other issues affecting my employment.

43. Notably, due to the mature nature of my program (which Buff once characterized as handling "adult topics in an adult way"), I worked the 10 pm to midnight shift on Sunday night when no other people were in the building. I visited the station during the day perhaps four times in the course of my approximately ten-week employment, such as for my job interview and some training. These were brief visits lasting no longer than one hour. Therefore, my total time spent on station property, apart from doing my program Sunday nights, was about four hours.

44. The topic of alleged sexual harassment of station employees was not covered in my exit interview with Jimmy Buff on April 20, 2018 at the Broadway Lights Diner. All Buff said was that I was fired for allegedly making women uncomfortable [EXHIBIT 11]. Now that story has morphed into something much more sinister, as the respondent RADIO KINGSTON/NOVO FOUNDATION in its pleading before the Division is now taking the "Weinstein" rationale, as demonstrated by its own exhibit.

45. Unlike *Chronogram*, an organization of modest means, RADIO KINGSTON/NOVO FOUNDATION did not conduct a formal investigation into any of the rumors or claims, though Hillary Hoffman Harvey provided respondent with recordings of interviews she conducted, even as Buff falsely claimed that "she's not doing this on our behalf" [EXHIBIT 11].

46. When questioned by email, Hillary Hoffman Harvey explicitly stated that respondent RADIO KINGSTON is supporting her efforts [EXHIBIT 12]. Please see special discussion of Harvey, below, at paragraph 98.

47. All exhibits provided by respondent RADIO KINGSTON/NOVO FOUNDATION are post-hoc, all from the months of May or June -- weeks after I was dismissed on April 20 -- in an attempt to retroactively justify and rationalize my dismissal. Only one exhibit seems to match any of the claims in the reply, particularly of misconduct.

48. Neither does respondent provide one iota of affirmative defense, nor any proof of the many false claims they make, nor evidence of my alleged bad character. All exhibits are taken out of context, and provided without any

evidence of understanding their actual meaning. I will cite several examples later in this response.

49. Respondent seems to believe that it can justify its actions by attempting to shock the Division's investigators with name-calling, salacious statements, out-of-context references, insults, and misleading exhibits designed to impugn my character and demonstrate that my work is not of a serious nature.

The Perjurious Kathleen Griffin Deposition

50. Respondent RADIO KINGSTON has provided, as an exhibit to its response, a false deposition made to the Kingston Police, purportedly written by a Kathleen Griffin, someone who I do not know.

51. This post-hoc document, dated May 29, 2018, is demonstrably fabricated out of whole cloth. It is provided to the Division in an attempt to falsely imply that an order of protection has been issued against me to protect Griffin.

52. I first heard of this person and these claims when reading respondent's reply. The Division was informed before I was, indicating that the exclusive motive for the construction of this document is to bias these proceedings.

53. In fact, there has been no show-cause hearing, and no order of protection has been served because none exists.

54. In her deposition to the Kingston Police, Griffin falsely claims I am somehow reading her personal email. She seems to ascribe supernatural powers to someone who, she claims, precisely precedes her arrival in a café where she has not been for several months. Notably, she also claims to find me in the ONLY places I frequent -- all of them along my two-minute route from my home to my office [please see map, **EXHIBIT 9**]. Dominick's Café, BSP and Outdated are the only neighborhood establishments I frequent. I have often promoted and posted my affinity for these three places, in particular, to my Facebook timeline; it's public knowledge that I am a customer of these establishments.

55. Respondent RADIO KINGSTON/NOVO FOUNDATION did not have this document available at the time it illegally fired me. Rather, it's part of respondent's attempt to manufacture a pretext for my firing. The Griffin deposition is being used, not just as post-hoc rationalization for my illegal termination, but also as an attempt to impugn my reputation before the Division under the false color of law. No prior mention of these claimed "incidents" claimed by Griffin had ever surfaced prior to May 29, 2018, even though they purportedly date back four years.

56. The deponent, Kathleen Griffin, said that she is part of "Me Too Kingston," which was started by RADIO KINGSTON/NOVO FOUNDATION employee Hillary

Hoffman Harvey, a person who has consistently demonstrated animus against me, even falsely claiming that I am "one of [her] Me Too stories."

57. Hillary Hoffman Harvey personally responds to email sent to "metookingston@gmail.com." [Please see **EXHIBIT 12**]. Since Harvey admits that respondent RADIO KINGSTON/NOVO FOUNDATION backs her, "metookingston@gmail.com" is constructively a RADIO KINGSTON/NOVO FOUNDATION email address. Therefore, "Me Too Kingston" is a functioning arm of respondent RADIO KINGSTON/NOVO FOUNDATION's efforts to malign my character. The "organization" has no other purpose.

58. We are working to understand how the Griffin deposition came into being, and through what steps it got from a supposedly confidential, secure police file into the hands of RADIO KINGSTON/NOVO FOUNDATION's legal counsel.

59. The document is not a proper scan or PDF, but appears to be a photograph of the original. For this reason, it is possible that it may have been provided inappropriately to RADIO KINGSTON/NOVO FOUNDATION. Notably, this document, presented as a photograph, has not been authenticated.

60. (a) Respondent states, "In or about March 2018, the station learned for the first time of allegations that Coppolino had harassed a former Radio Kingston freelancer," without naming the person. Respondent adds in a footnote: "Radio Kingston has since learned that same woman has filed a police report against Coppolino." Police reports are public record. Respondent does not provide such; instead they provide a deposition. A layperson might confuse a police report with a deposition, but when an attorney substitutes one term of art for another, it can be presumed intentional, especially where the "error" is self-serving.

(b) It seems an odd coincidence that Griffin just happened to have a prior employment relationship with the respondent, and also a connection to Harvey and/or Novak.

61. This statement also demonstrates that Griffin, who is part of "Me Too Kingston," a group first announced by respondent's employee Hillary Hoffman Harvey, is part of the same network, by respondent's own admission.

62. Respondent RADIO KINGSTON's station manager Jimmy Buff failed to mention Griffin in either of our two April conversations, though respondent claims to have known about the purported claims as early as March, and they are said to date back to 2014.

63. If respondent knew about Griffin in March, station manager Buff had an obligation to say something to me, particularly in a special discussion in April called to address such topics -- when I specifically asked for the whole story.

64. If Buff knew about Griffin's claims, he lied when I asked him if my allegedly

"making women uncomfortable" was the only issue with me that he had, and he agreed that it was. Further, respondent has provided no contemporaneous evidence that it knew of anything "in or about March 2018," and as the deposition was prepared in late May, respondent is attempting post-hoc to rationalize its actions, under false color of law.

Former Federal Prosecutor Investigates

65. *Chronogram* magazine is a Kingston-based organization for which Hillary Hoffman Harvey served as editor-at-large until late May 2018, when she said in a Facebook post that she resigned. I had served *Chronogram* for 22 years when the campaign started by Harvey, its own employee, and Novak, a current employee for the respondent (and also a former high-level *Chronogram* employee), was commenced.

66. Unlike RADIO KINGSTON/NOVO FOUNDATION, *Chronogram* engaged an investigator: former Assistant United States Attorney Ryan Poscablo. Poscablo is a specialist in investigating claims of sexual misconduct. He was assisted by an associate counsel and a paralegal, to look into the claims of Harvey, and another former *Chronogram* editor, Lorna Tychostup, and other sources -- and he found nothing; nothing checked out.

67. *Chronogram's* investigator examined all "stories" brought to it by its employee Harvey, who also provided her data to respondent RADIO KINGSTON/NOVO FOUNDATION. Poscablo reviewed "stories" from all other available sources, though Harvey made herself a focus of the process by publicly advertising her metookingston@gmail.com email address to respondent's current employee Julie Novak's Facebook timeline.

68. Poscablo's interview with me, conducted on May 10, 2018, raised no matters of misconduct whatsoever. That is because there were none. Rather, Poscablo questioned me about my lawful, consensual social activity with other adults. Though Poscablo spent considerable time with Harvey, and had access to all reports submitted to "Me Too Kingston," Kathleen Griffin did not come up.

69. Ryan Poscablo's investigation cleared me of any wrongdoing. *Chronogram's* publisher and co-founder, Jason Stern, characterized the results of the Poscablo investigation as follows:

"There is nothing -- there's nothing criminal, there's nothing nonconsensual ... Some people have an agenda. But nobody's lying. And -- and, you know, it -- it has to do with -- anyway, the result of a very extensive investigation was nothing -- was that the attorney said, no, there's nothing here -- extensive investigation...that was Ryan's final word" [emphasis added].

70. My interview by Poscablo lasted 90 minutes. I have a recording and a transcript of that interview. I will enter the transcript into the record as [EXHIBIT 13]. I have also covered the Poscablo investigation in a series of articles, called "Wicked Game" [EXHIBIT 14].

71. It seems impossible that respondent RADIO KINGSTON/NOVO FOUNDATION did not know about the Poscablo investigation while it was underway, given that Hillary Hoffman Harvey worked for both RADIO KINGSTON and for *Chronogram* well into May. *Chronogram*, Omega Institute (respondent in a parallel complaint) and the respondent discussed the issue and the possibility of an investigation process in the first days after respondent's employees' malicious rumors were intentionally published to the internet in early April.

72. Jason Stern told me he thought that Hillary Hoffman Harvey, who was then employed by him as an editor, was coming after me as part of a career development project, as she has been outspoken on the "Me Too" issue and, Stern said, it was his perception that she wanted to make a name for herself. "Taking out" someone of international stature would certainly accomplish that. Please see special section on Hillary Hoffman Harvey, starting at paragraph 98.

My Reputation as a Writer, Teacher and Broadcaster

73. All facets of my work depend on trust, particularly of women, who are my primary readers and consulting clients, and often my editors. This trust has been endangered by the reckless and malicious activities of RADIO KINGSTON/NOVO FOUNDATION and its employees. Until April 4, 2018, the time of Julie Novak's original post, I had a spotless reputation both as an author and as a man. You will find no record of any discussion of my falsely claimed misdeeds prior to April 4, 2018.

74. In the following paragraphs, I will describe my professional activities and my reputation as they existed up until April 4, 2018, when RADIO KINGSTON/NOVO FOUNDATION employees Novak and Harvey objected to my February article about the "Me Too" movement in *Chronogram* ("Take a Step Back"), and then began making false claims about me, intentionally setting out to tar my good name, and to get me fired by my employers.

75. My career as a writer and broadcaster is focused in three primary areas, of which respondent was aware at the time of my hiring: investigative reporting in the chemical and electrical industries, and general political reporting; sexuality; and astrology. These may seem like widely disparate subjects; though, in my work, I demonstrate that they are fully integrated. I typically do this on my radio program or podcast, and often in published articles. This is my particular niche in the astrology profession.

76. I teach at conferences and other events on these subjects in an integrated way. For example, in approximately 2010, I offered a lengthy seminar on

investigative reporting techniques at an LGBTQ bloggers' conference in Washington, DC. When I teach at astrology conferences, I will often use the chart of my mentor Dr. Betty Dodson, an early founder of the sex-positive feminist movement, and author of the internationally famous bestselling book *Sex For One*.

77. My longtime mentor-student relationship with Dodson, which dates to approximately 1995, provides the context for all of my written and visual work product on the subject of masturbation [EXHIBIT 15].

78. I concur with Betty's approach, developed over half a century, that self-sexuality is a legitimate sexual orientation, practiced by millions of people -- and that a person's relationship with himself or herself is the most important in their life, as it is the inner reference point and basis of all external relationships.

79. At the time of my hiring by respondent RADIO KINGSTON's station manager Jimmy Buff, in late 2017, Buff was aware that I had covered these very topics in my local monthly column in *Chronogram* for more than 20 years. For example, Betty Dodson was prominently featured as a guest on my Radio Woodstock program as early as the second show in 1996.

80. Dating back to my program on Radio Woodstock (at the time when Jimmy Buff worked there), through to the time of my hiring by respondent, I would discuss many other facets of sexuality and relationships on the air, including polyamory (responsible nonmonogamy), negotiating consent, tantric practice, celibacy, the value of therapy, women's health issues, women's reproductive issues, an interview with a dominatrix, and many related topics. For the past two decades, I also covered these topics in my column in *Chronogram* [please see **EXHIBIT 8**].

81. Presenting a sane, friendly and informative discussion of sexuality is an important purpose of my program, as it has existed, since its origins, and to the present day.

My Writing and International Recognition on Sex and Gender

82. I have attained a measure of sustained international recognition in all of these subject areas, to wit:

83. My writing on gender and sexuality has been published by *The Journal of Bisexuality*, *Common Ground*, *Loving More*, *The Ecologist*, *Clean Sheets*, *Chronogram*, *Sexuality.org*, *BettyDodson.com*, *RealAstrology.com*, and other outlets [**EXHIBIT 16**].

84. My photo project, *Book of Blue*, was so well respected by psychology professionals that I was invited to be a speaker at the American Psychological Association (APA) world congress in Toronto, Ontario, on Aug. 7, 2009. My

program was titled: "The Inner Gaze -- Reconstructing Women's Sense of Self" [EXHIBIT 17]. Few non-Ph.D.s ever get to present before the APA.

85. I have served as a photo model for the book *Sexual Healing Through Yin and Yang*, by Zaihong Shen, published by Dorling-Kindersley, also known as D.K. I was paired with my then-lover and artistic collaborator Maria Henzler, and served as a model for this book about tantric sex and health. I also assisted the publisher as a paid consultant and model recruiter. D.K. is a multinational publishing company specializing in illustrated reference books, in 62 languages. It is an imprint of Penguin Random House [EXHIBIT 18, please note, photo is posed, not real].

86. In October 2017, I was the first person in the national press, in the current "Me Too" era, to come out as a male survivor of sexual harassment in a prominent op-ed column in the *New York Daily News* [EXHIBIT 19].

87. My articles on masturbation are used as training materials by Joseph Kramer, Ph.D., founder of the Body Electric School in Oakland, and later the founder of "the new, legal profession of Sexological Bodywork." Dr. Kramer is on the faculty at The Institute For Advanced Study of Human Sexuality and The International Institute of Sexological Bodywork in Zürich.

88. Based on my knowledge and, moreover, based on the trust my sponsors have had in me as a presenter who will take care of their participants, I have presented keynote addresses, or workshops, related to sexuality at the Loving More conference in both New York and Berkeley, the Poly Living Conference, the Celebration of Sacred Sexuality, Club Relate, Northwest Herbal Faire, and others.

Internationally Published Horoscope Writer and Research Astrologer

89. My horoscope column has appeared without interruption in different formats since April 1995, and is currently published in the *New York Daily News*, as well as previously in the *Daily Mirror* (UK), the *Daily Mail* (UK), the *Morning Herald* (Australia), *Woman* (UK), *Harper's Bazaar* (Australia), *Marie Claire* (US), *Canadian Home*, *Espana Match*, People.com, Astrology.com, StarIQ.com, America Online, Hola.com, Cainer.com, and numerous other publications (in addition to being the primary source of both traffic and revenue for my business, Planet Waves, Inc.).

90. My horoscope is one of a very few (and perhaps the only one currently written) that directly addresses sexuality in an informative and nonpartisan way. For example, in the *Daily News* horoscope for Monday, June 25, 2018, I wrote:

ARIES -- Much of your confidence comes from having a sense of your sexual nature, or it can. Society does everything it can to deny this, however, I suggest that you know who and what you want, whether or not you think it's realistic. It's much better to be real.

And for June 26, 2018:

LEO -- The novelist Robert A. Heinlein once wrote that "everybody lies about sex." It is, however, time to end that policy. Stick to the facts. The truth alone forms the foundation for healthy, functional and happy relationships. Deception in any form is a key ingredient in misery.

91. My work as a research astrologer has been published by *The Mountain Astrologer*, including a major investigative feature on the history and the astrological chart of Monsanto, and a major article on the minor planets discovered since 1977, which is my astrological specialty. My work has also been published in astrological journals in the Netherlands, Germany and Finland. [EXHIBIT 20].

92. I have taught astrology at the United Astrology Conference (UAC), the Northwest Astrology Conference (NorWAC), the NCGR astrology conference, the Blast Astrology Conference, Astrology Toronto, the Omega Institute for Holistic Studies, the Manchester Astrological Lodge (UK), and at other events. I have taught many classes through my own business, Planet Waves, Inc.

International Publications as an Investigative Reporter

93. My work as an investigative reporter on environmental toxins, which spans from 1983 to the present, has been published in *Sierra*, *The Ecologist*, the *Village Voice*, *Woodstock Times*, the *Las Vegas Sun*, and others, and has been the subject of various articles and book chapters over the years. I have also covered municipal news, the trades, public higher education and real estate fraud.

94. One environmental journalism project I am co-author of, called The Gemstone File/The Poison Papers, has recently received coverage in *The Intercept*, National Public Radio (NPR), Truthout.org, Salon.com and others.

95. *The New York Times* has covered my reporting career, or specific subjects I have initiated in my reporting, on no fewer than five occasions, including in an editorial. For example, on Nov. 24, 2017, the *Times* published a profile about me, in which its reporter presents me to its global audience as an expert on the astrology of the news, and of sexuality [please see EXHIBIT 5]:

For 23 years, Mr. Coppolino, who grew up in Marine Park, Brooklyn, and went to John Dewey High School, has been writing what he describes as "news astrology," or reporting on current events through the lens of planets, houses and signs. The first major story he covered using astrology was the impeachment of former President Bill Clinton in the 1990s.

More recently, he has used astrology to help him interpret news of three hurricanes, Harvey Weinstein, North Korea, the mass shooting in Las Vegas and the terrorist attack in Lower Manhattan. Mr. Coppolino studied the time and place of the New York truck attack (an "event chart") to

examine questions about the driver, Sayfullo Saipov, and how the tragedy happened.

The chart, "like an objective map to the situation," pointed to "sexual agony, loneliness and a sense of being homesick," as part of Mr. Saipov's motivation, Mr. Coppolino wrote in Planet Waves. And when looking at the time and place of Mr. Saipov's birth (a "natal chart"), Mr. Coppolino saw "a person under extreme inner pressure, but also with the ability to be innovative."

"I really try to avoid rationalization," Mr. Coppolino said. "We're not here to blame the planets, but rather, to take some guidance and use this technique for an expanded perspective."

96. Respondent RADIO KINGSTON/NOVO FOUNDATION and its employees Novak and Harvey knowingly exploited my vulnerability as a writer in controversial fields, particularly sexuality, to create the false, malicious image that my intent is not to promote discussion of healthy sexuality, but rather to injure or take advantage of others. They then used my own recognition and success as a weapon against me.

97. With the exception of a demonstrably false deposition provided by Kathleen Griffin on May 29, long after respondent illegally terminated me, there are no accusers alleging or making claims of any illegal, immoral or inappropriate conduct by me, and respondent RADIO KINGSTON/NOVO FOUNDATION knows this. There are only vague rumors. Where women who have allegedly "come forward" are referenced, they are spoken of in sketchy terms, never by name and with no details of the purported conduct provided.

The Special Animus of Hillary Hoffman Harvey

98. Hillary Hoffman Harvey has several roles in this scenario. For example, in January 2018, she organized a "Me Too" public forum for *Chronogram*, and respondent RADIO KINGSTON, which cosponsored the event.

99. Soon after Novak's original Facebook post, Harvey -- in one short comment -- declared me the "**Hudson Valley's [Harvey] Weinstein,**" and announced that she was collecting stories at the "metookingston@gmail.com" email address, as a news reporter. She further claimed in that comment that I am one of her "Me Too" stories, also implying that I am one of several people who have allegedly harassed her. She later edited out these phrases, which implies that she recognized her culpability in making such statements.

100. Harvey then collected various stories from women, promising anonymity, and presented them to both *Chronogram* and respondent RADIO KINGSTON/NOVO FOUNDATION. In effect, she was the field investigator for both organizations. She is unqualified to do this based exclusively on her many conflicts of interest.

101. Hillary Hoffman Harvey plays the multiple role of community organizer and activist, journalist, social media participant, victim rights advocate, internal investigator, personal victim and Victorian chaperone. She is also claiming the role of "forensic psychologist," at one point writing, "If I had thought that Eric Francis's introspection was legit, I might have responded differently to his sexual predatory nature." Harvey has no personal knowledge of what she claims, interprets or describes [EXHIBIT 21].

102. I repeat that I have met Harvey once for approximately 30 seconds; and, perhaps two or three other times, I have encountered her only in passing. We have no mutual friends.

103. Harvey has previously taken a public position critiquing my reporting style, and lecturing me about obeying rules and laws as a professional journalist, purporting to be one. Approximately two weeks later this same person would be engaging in the intentional tort of libel per se [EXHIBIT 22].

104. In the midst of this debacle, she took the role of advocating for a Greek restaurant in our town, where she claimed I was not welcome, suggesting that in response, people should patronize this "woman-run business" [EXHIBIT 23]. It is utterly bizarre that someone who is accusing me of being the "local Weinstein" would take interest in my claimed conduct as a reporter at a protest, or as a customer in a restaurant. This is evidence of a personal crusade having nothing to do with the supposed issue at hand.

105. As the leader and founder of "Me Too Kingston," she was involved, whether directly or indirectly, with the false police report filed by Kathleen Griffin, who identifies herself as a member of "Me Too Kingston."

106. Though they deny it, Harvey serves as an agent of respondent RADIO KINGSTON/NOVO FOUNDATION and its efforts to dismiss me [please see EXHIBIT 12].

107. All of this, combined, is enough to present Harvey as a person with special animus. In the context of respondent RADIO KINGSTON/NOVO FOUNDATION 's admitted disregard for truth, her assertions, claims and "research" must be subjected to careful evaluation. The fact that Jimmy Buff specifically denied in my exit interview that Harvey was actually serving RADIO KINGSTON/NOVO FOUNDATION in her multiple capacities indicates he was concealing that fact.

108. Hillary Hoffman Harvey resigned her position as editor-at-large of *Chronogram*, and as the go-between for respondent RADIO KINGSTON/NOVO FOUNDATION and *Chronogram*, on or about May 17.

109. I do not purport to understand her motives; though, as Justice Oliver Wendell Holmes said, even a dog knows the difference between being stumbled over and being kicked.

Rebuttal to Additional Radio Kingston Points and Exhibits

110. I hereby reject any and all claims about my conduct made by respondent RADIO KINGSTON and its agents as false and defamatory. Were I to bring a defamation action against the respondent and its agents to protect my good name, I would include its entire reply to the Division as an exhibit. I have done my best to cover the most egregious lies in the paragraphs above.

111. In the following paragraphs, I will cover a few additional rebuttals of claims.

112. In the introduction to its reply, respondent RADIO KINGSTON/NOVO FOUNDATION falsely accuses me of misconduct with "women and at least one girl under age 18." This assertion, a bald, defamatory attempt to cast me as a predator of underage minors, exists nowhere in the record, including the exhaustive Poscablo investigation.

113. To the contrary, respondent's own employee, Julie Novak, in a post dated April 4, 2018, asserts that I went hiking at age 32 with a university freshman named Dana Barnett, who was then age 18 [EXHIBIT 24]. In the same exhibit where Barnett reveals her age, she also reveals that she was contacted by respondent's employee and agent, Julie Novak, who sought out her "story" and published it to the internet. This story repeats the pattern of critiquing "Take a Step Back," then claiming that the article was allegedly written as a cover-up for my alleged misdeeds.

114. Regarding Dana Barnett, who claims to have been a university freshman when she says we went hiking -- in 1996, some 22 years ago -- her claim was debunked by the Poscablo investigation. This pertains to respondent's false claims of someone under the age of 18 on page 1 of its response, and also the purported "tarot card" incident of the response on page 4, wherein respondent admits that this same claim relates to an 18-year-old. Relating to this claim, investigator Poscablo asks, "do you recall having a sexual encounter -- consensual -- with a woman who was a student at New Paltz, in the woods?" [please see transcript at **EXHIBIT 13**]:

POSCABLO: You said that you do not recall having a sexual encounter with anyone from -- from -- with a student from [SUNY] New Paltz 20 or so years ago.

ME: Well, I certainly had friends on the campus, in my time on the campus. I was in New Paltz ten years. But I'm telling you that one of them was not anyone named Dana, or Dana Barnett.

POSCABLO: Right, so let me ask the different question that I asked, which is that

-- do you recall having a sexual encounter -- consensual -- with a woman who was a student at New Paltz, in the woods?

ME: No. Did not happen. Don't recall and did not happen, because it did not happen.

POSCABLO: Okay.

ME: I have no unaccounted-for sexual encounters. It did not happen.

POSCABLO: What does that mean, unaccounted-for?

ME: It means that I know who -- I'm extremely careful --

POSCABLO: Okay, yep.

ME: -- and selective and cautious --

POSCABLO: Okay.

ME: -- contrary to what is being said on Facebook.

115. Respondent states, "After the accusations concerning Coppolino's misdeeds became public, Radio Kingston obtained ample evidence that Coppolino engaged in sexual misconduct." Yet the respondent has not only failed to provide evidence; it does not even state what the "misdeeds" or "sexual misconduct" might be, or who its supposed victims might be. This name-calling is consistent with the public activities of Novak, Harvey and others.

116. Respondent states, "The totality and substance of the allegations led Radio Kingston to plausibly conclude that Coppolino engaged in at least some of the conduct of which he was accused." Yet once again, with the exception of the perjurious Griffin deposition, which was written post-hoc nearly six weeks after my dismissal, respondent RADIO KINGSTON/NOVO FOUNDATION provides no statements or claims by purported victims -- it only repeats name-calling and rumors. There is no ample evidence. It does not exist. Its agent Griffin filing a false statement to the police is, however, an actual crime, as indicated on the form.

117. Respondent states that it has "multiple accusers' first-hand accounts of sexual behavior" yet it does not specify even one. Griffin's perjurious deposition does not include any mention of alleged sexual behavior.

My Dismissal Was Based on Sex Stereotyping

118. Respondent, in its reply to the Division, asserts that its dismissal of me was "not based on 'sexual stereotyping' -- rather, the station discharged Coppolino from his employment because the community had surfaced multiple accounts of his misconduct going back years" -- yet it fails to provide evidence or details in support of this claim. The concept of "Me Too" activism is the calling

out of men. Not one woman has been named as an alleged "Me Too" perpetrator. Simply put, this could not be happening to me if I was a woman.

119. Respondent asserts that, "The fact that Coppolino is male played no role whatsoever in Radio Kingston's legitimate, nondiscriminatory decision to terminate his employment." However, respondent attaches, as an exhibit, a comment from Facebook claiming in [EXHIBIT 10] that, "He's a condescending, womanizing abusive pig (in my opinion)." **This language could not possibly pertain to a woman, nor is there any female equivalent.**

120. Respondent, in an exhibit, quotes someone named Monique Alice, whose full name is Monique Alice Dauphin, a state-licensed psychotherapist. Dauphin is the host of Hudson Valley Feminists group on Facebook, where much of this conversation has taken place. She writes, in an exhibit provided BY the respondent to prove its case: **"I bet a million dollars this guy is a Weinstein."** Respondent here is explicitly admitting that its decision to terminate my employment was based on an opinion, not on facts.

121. Dauphin's expressed opinion is a clear reference to my being male. There is no female equivalent to a "Weinstein." With this exhibit, respondent RADIO KINGSTON has taken full possession of the "Weinstein" accusation, even stating a monetary value on its wager -- the same amount that the judge set as bond for Weinstein, \$1 million.

122. Respondent provides an exhibit that makes reference to photographs, but does not provide those photos, and the writer, who claims to be a former contractor of mine, states that she "does not recall what the text was." The text would be the context, for a company that specifically publishes photographs of the kind she describes.

123. Instead of providing proof of its assertions of misconduct, respondent includes several exhibits that are satirical and loving in nature, including a viral photo of musicians Janis Joplin and Ron "Pigpen" McKernan (of the Grateful Dead) in a playful display of affection, in the 1960s; a spoof discount coupon for the nonexistent Vagitarian Café; and a photo of me reading a book in the American Eagle apparel store in Manhattan, with a lingerie ad behind me. In the photo, I am focused intently on the book (*The Laws of Media*), which is intended as a compliment to my friend and mentor, its co-author Dr. Eric McLuhan; and to his father, philosopher Marshall McLuhan.

124. Demonstrating its prejudicial state of mind, respondent RADIO KINGSTON/NOVO FOUNDATION implies in a footnote that it would dismiss me solely based on these examples of protected speech, stating, "Notably, Coppolino's own Facebook page contains images with which few if any employers would wish to associate." Without irony, it omits its prior knowledge that my program has, and has always had, a focus on sexuality and was promoted by

RADIO KINGSTON/NOVO FOUNDATION as such from the premier edition [EXHIBIT 25].

125. Respondent RADIO KINGSTON/NOVO FOUNDATION includes as exhibits two letters from me to individuals associated with this situation, which would better serve as complainant's exhibits. In my June 9, 2018 letter to Hillary Hoffman Harvey, I ask her basis for referring to me as "Weinstein." In my June 9, 2018 letter to Eva Tenuto, the executive director of the TMI Project (and the wife of respondent's employee Julie Novak, also a co-founder of TMI Project), I ask Tenuto why she rewrote a paragraph from "Take A Step Back" to make it seem like I support Harvey Weinstein [EXHIBIT 26]. Note, I reference this "rewrite" issue in my original complaint [please see **APPENDIX A**].

126. (a) Perhaps most perplexing is the inclusion -- as evidence of my allegedly predatory character where sexual matters are concerned -- of my explanation of an invention called the True Mirror® in honor of Masturbation Month. This deserves a moment of elaboration. Masturbation Month was commenced in 1995 as an HIV/AIDS awareness project, advocating the safest and most consensual form of sex. The respondent is objecting to my advocacy for safe, consensual sex.

(b) Because I am widely known to consider self-sexuality a sexual orientation, this is evidence of discrimination based on sexual orientation.

127. The text connected to that photo, written by me, and posted openly to Facebook, states that the True Mirror "renders a non-mirror-image image. My observation is that this can deeply influence all matters of brain hemisphere relating, and provide a forum to correct the insidious problem of projection."

128. I do not know what including this is intended to prove; however, this exhibit in particular demonstrates my healthy sexual awareness, respect for individual dignity and integrity, and respect for personal and public health; and reveals that my associations with sexuality surround healing, relating peacefully, and love as something that can be playful.

129. This is a long way from respondent RADIO KINGSTON/NOVO FOUNDATION's many malicious insults and accusations of misconduct, and demonstrates they are aware that I am not the person they claim that I am.

Conclusion and Redress

130. The events of the past three months, precipitated by agents of respondent RADIO KINGSTON/NOVO FOUNDATION, have dominated my life, affecting every one of my relationships, my work, my health, and my professional activities. I have lost sleep, lost professional relationships I have nurtured for years or decades, been removed from the faculty of an international scientific conference, and been subjected to humiliation and attack in my small community -- all at the

hands of respondent's employees. Respondent has endorsed and participated in this behavior.

131. This crisis is ongoing. The rumors continue to spread, and much of my time, and staff time, is being devoted to dealing with this situation. The nature of insidious, toxic gossip is that, once released, it's like a feather pillow breaking open: you can never collect all the feathers and put them back where they belong. They just continue to spread.

132. Even if the Division were empowered to grant injunctive relief, that would still not solve the problem of damage to my reputation, which I will live with for the rest of my professional life and natural life; falsehoods which will (due to the nature of the internet) outlive me. If this is not resolved in my favor, this will likely spell the end of a broadcast radio career that I worked for many years to get off the ground.

133. Nothing has been too petty for those involved in provoking this episode. The original post by respondent RADIO KINGSTON/NOVO FOUNDATION's employee Julie Novak was immediately spread within the network of a local potluck dinner, called "Wandering Wednesdays" -- on the very night I was hosting a dinner in my studio: April 4, 2018. I was banned from that group of 400 participants, and shunned by a wide community where I am still to this day not welcome. It is effects like this that cannot be measured in any terms but the feeling of being torn, socially, from one's home: a place where I have chosen to live, established my household, and my businesses, and committed to participating in the community.

134. This whole discussion has supposedly been about consent. The word "misconduct," which has been casually thrown around by the respondent, is about consent, or it is meaningless. Respondent RADIO KINGSTON/NOVO FOUNDATION has thought nothing of putting on display a false version of who I am, without any consent from me; a vision constructed of the shadows in their own psyches and nothing else.

135. In light of all of the above, and moreover, the defamatory, malicious comments in respondent's filing, I am seeking restoration of my program, compensation for lost wages, a written apology, and libel training for all RADIO KINGSTON/NOVO FOUNDATION employees and management;

136. And I am seeking liquidated compensatory relief, particularly for respondent's reckless disregard for the truth or falsity of its own statements, actual malice and prejudice against men evidenced in its admission, "Whether Coppolino engaged in some, all, or none of the conduct alleged by his accusers is largely immaterial."

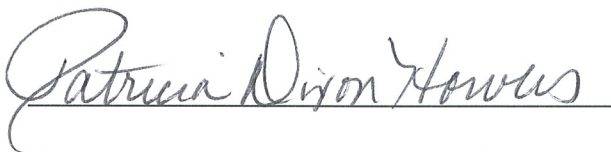
137. Respondent RADIO KINGSTON and its sole financier, THE NOVO FOUNDATION, have put their image and standing in the community above basic

human rights. They have laid claim to all that is not their own: my safety, my relationships, my personal reputation, my professional reputation, my community service projects, my peace of mind and freedom to enjoy the reputation I have so carefully built -- and, most notably, above the truth.

138. Worse, respondent is attempting to give itself a pass to sex discrimination in the name of a political goal and "political correctness," which must not be allowed to emerge as a trend. They are lashing out against one who dared to speak against unlawful discrimination.

139. In light of the above, and since respondent RADIO KINGSTON/NOVO FOUNDATION produced no evidence to justify my firing, I ask that the New York State Division of Human Rights find probable cause, and proceed to an investigation and hearing.

SIGNED AND AFFIRMED BEFORE ME THIS 5th DAY OF JULY, 2018



Notary Public of the State of New York

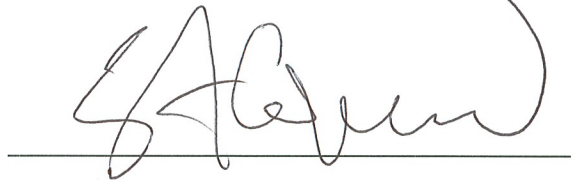
PATRICIA DIXON HORVERS

Notary Public - State of New York

ID No. 01D16146488

Qualified in Ulster County

My Commission Expires May 22, 2022



Eric F. Coppolino