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COMMONWEALTH OF MASSACHUSETTS
SUFFOLK SUPERIOR COURT
BUSINESS LITIGATION SESSION

BENJAMIN EDELMAN,
Plaintiff,

v.

Civil Action No.

PRESIDENT AND FELLOWS OF HARVARD
COLLEGE,
Defendant.

2384CV00395-BLS2

DEPOSITION OF ANGELA CRISPI

DATE: Tuesday, June 17, 2025
TIME: 9:39 a.m.
LOCATION: Zalkind Duncan & Bernstein LLP
65A Atlantic Avenue
Boston, MA 02110
REPORTED BY: Jared Reding
JOB NO.: 7309634

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1 someone else?
 2 A Not that I recall.
 3 Q That was someone's view on his character?
 4 A Yes.
 5 MR. MURPHY: Objection.
 6 BY MS. COSTELLO:
 7 Q Was it your view on his character?
 8 A There's lots of definitions of bullying, but
 9 no.
 10 Q Do you think that someone else used the term
 11 "bullying" in the meeting?
 12 A Yes.
 13 Q Do you have any memory of who?
 14 A No.
 15 Q A little bit again below that, the sixth or
 16 seventh bullet point in that section. I read it to
 17 say, "Systematic pattern of low level of
 18 self-awareness, which gives us concern as being a
 19 tenured fac." I take that to mean "tenured faculty
 20 member"?
 21 A That would be right.
 22 Q Okay. Did I read all of that correctly?
 23 A No, you did -- yep. You got it correct.
 24 Q Was that an opinion that you held as of the
 25 date of this meeting?

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1 MR. MURPHY: Objection.
 2 THE WITNESS: Yes.
 3 BY MS. COSTELLO:
 4 Q Okay. Did you have a concern about Ben
 5 being a tenured faculty member?
 6 A Yes.
 7 Q And at the bottom there's a little starred
 8 spot where it writes, "Written statement of the
 9 allegation." In this meeting, did you discuss what
 10 would be included in the notice letter that ultimately
 11 was sent on July 31st?
 12 A Yes, we would have.
 13 Q What do you recall about that discussion?
 14 A We knew we were -- we were looking to try to
 15 see, you know -- did he understand what had happened?
 16 What -- how many -- what was the pattern of this over
 17 time? Again, was it pervasive?
 18 So this piece of patterns of
 19 behavior -- this was a discussion about that, which is
 20 what the report needs to do, is to take a look at not
 21 only the incidents that would've happened, but those
 22 sets of questions.
 23 Q Did you make a decision at this meeting
 24 about which incidents between Ben and the staff would
 25 be included in the notice letter to him?

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1 A Yes, because he received the letter the day
 2 later.
 3 Q Do you recall how the four specific areas of
 4 interaction between Ben and staff were selected for
 5 inclusion in that letter?
 6 A I don't recall that.
 7 Q All right. I'm going to show you what we've
 8 previously marked as Exhibit 41, and I'm going to ask
 9 you just about the first page for right now.
 10 A Okay. Okay. That's fine.
 11 Q Does the first page have -- are those notes
 12 of an FRB meeting on September 4, 2015?
 13 A I assume so.
 14 Q Have you seen this before?
 15 A Yes, I've seen this in -- in preparing.
 16 Q Okay. Was it shared with you at the time?
 17 A No.
 18 Q But you've looked at it in the course of
 19 preparing for this deposition?
 20 A Yes, I have.
 21 Q So in the middle of the first
 22 page -- actually, let me back up a little. In this
 23 meeting, was the FRB discussing Ben's -- a written
 24 statement that Ben had provided?
 25 A Yes, because he provided the statement on

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1 August 15th, and we were meeting on September 4. So
 2 we were taking a look at his statement.
 3 Q Okay. And so when you say -- so in the
 4 middle of the page, there's a quotation from you -- or
 5 you know, what seems to be a quotation from you?
 6 A Sure. Yeah.
 7 Q Do you think that that's something that you
 8 said?
 9 A Yes, I like -- I did say that.
 10 Q Okay. So when you say "struck by first two
 11 paragraphs," you're talking about Ben's response to
 12 the FRB?
 13 A Exactly.
 14 Q Okay. You then say, "But happy about
 15 litigation and incarcerating two people." Why did you
 16 remark on those activities?
 17 A I think when we had interviewed Ben, it was
 18 instructive to have him talk about earlier time
 19 periods in his life. And I just found it peculiar to
 20 be pleased about stories that had to do with those two
 21 topics.
 22 Q You knew that he was also an attorney;
 23 right?
 24 A Yes.
 25 Q And did you have an understanding of what