

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** Thursday, November 18, 2021 7:12 PM  
**To:** [REDACTED]  
**Subject:** WebEx with Paul Kane

WebEx – 11/18/21

Gary Stein  
Paul Kane  
Keni Ukabiala

[REDACTED]  
[REDACTED]  
[REDACTED]

- Reviewed pseudonym order
- It's public that PCS has some connection to the case – got call from a parent, there is a Daily Beast article
- PCS has existed since 1914. 6-12 grades, students in professional careers while in school (e.g. performance)
- PK Responsibilities: all financial oversight, operations, archives, financial aspect of enrollment
- To apply now, the application is online. If the applicant applies for financial admission, it's at the same time
- Familiar with the way it worked in the 1990s through archives and conversations with the admissions director, and dir of receivables. Dir of admissions was a student in the 80s and dir of admissions starting around 2000-01.
- In the 90s, the paper application was 4 pages
- In the 1990s, receive applications, would be sent a hard copy to fill out and complete. Now, it's online.
- Received applications were processed by the admissions director, then financial billing for enrolled students. Same from 1990s to the present
- PCS keeps records for 6 years NY State Ass'n of Indep. Schools. Kept in ordinary course of business. Then normally shredded.
- Maintains in the normal course the applications.
- In student's permanent file, they would have the transcript college recommendations – kept permanently, occasionally other things are kept in the file due to oversight. There's no specific admissions file.
- GX 761: an application to the PCS from 1998. Has seen this student's complete electronic file.
- At trial, wants a hard copy or to see every page before confirming on the stand that it's a true and accurate copy
- In approximately 2011 or 12, the student permanent files were digitized. This document had not yet been purged at the time student's file was digitized
- PK Previously chief admin officer for the international preschools from 2009 to 2019. Before that, dir of finance of Marymount school of the art 2004-09

**SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17**