

LAW OFFICES  
WILLIAMS & CONNOLLY LLP

725 TWELFTH STREET, N.W.  
WASHINGTON, D. C. 20005-5901

DAVID E. KENDALL  
(202) 434-5145  
dkendall@wc.com

(202) 434-5000  
FAX (202) 434-5029

EDWARD BENNETT WILLIAMS (1920-1988)  
PAUL R. CONNOLLY (1922-1978)

September 23, 2016

By E-mail

The Honorable Lamar Smith  
Committee on Science, Space, and Technology  
2321 Rayburn House Office Building  
Washington, DC 20515

Re: Subpoena issued to SECNAP Network Security Corporation

Dear Mr. Chairman:

I represent the Clinton Executive Services Corporation ("CESC"). On behalf of my client, I respectfully object to the subpoena for the production of certain documents issued to SECNAP Network Security Corporation on September 12, 2016. The subpoena, which requests categories of documents relating to networks or servers used by Secretary Clinton and/or CESC, is overbroad.

We have no objection to the production of documents related to the SECNAP security device used in connection with the server that, along with CESC employees' emails, hosted Secretary Clinton's e-mails from her tenure as Secretary. As you know, this server was voluntarily provided to the FBI in October 2015.

We do object, however, to the production of SECNAP documents and security information regarding server equipment that was used by CESC *after* the prior server was provided to the FBI, and thus, never hosted Secretary Clinton's work-related e-mails. Documents regarding this equipment are likely to contain sensitive information related to security of the current network and/or server. Because these documents are unrelated to the Committee's investigation and contain sensitive security information, I respectfully object to the portion of the subpoena seeking their production.

Sincerely,



David E. Kendall

cc. The Honorable Eddie Bernice Johnson, Ranking Member  
Dennis Nowak, Esq.