

225

1 a request to Secretary Clinton at this time to
2 provide the search parameters that were used for
3 the review of Secretary Clinton's e-mails, would
4 Secretary Clinton provide that to the State
5 Department?")
6 **A So we posted the -- I shouldn't say "we."
7 The -- her presidential campaign posted the --
8 regarding the search process on their campaign
9 website in 2015. So I am familiar that
10 information has been released about this.**
11 Q I'm asking specifically with respect to
12 what search terms were used and what names were
13 used during the review process.
14 **A I can't speak to that.**
15 Q Why not?
16 **A I would have to consult other counsel.**
17 Q I believe you, during your interview with
18 the FBI, you were asked about a gap in e-mails
19 that you noticed in Secretary Clinton's e-mails
20 from January 2009 to March of 2009.
21 Do you recall that?
22 MR. BREWSTER: Objection. Foundation.

226

1 **A I do.**
2 Q Okay. Can you explain to me what that
3 gap was?
4 **A My understanding is -- well, I'm sorry.
5 I should say my recollection is when we received
6 the documents -- the file from Platte River
7 Networks, there was a period of time that was
8 missing in her e-mails. And that period of time
9 was January 2009 to March 2009.**
10 Q And what did you do as the result of
11 discovering this gap in the e-mails from January
12 2009 to March 2009?
13 MR. PEZZI: Objection. Beyond the scope.
14 MR. BREWSTER: Same objection.
15 **A I asked Platte River why we did not
16 have -- why they did not provide those.**
17 Q And what did they tell you?
18 **A They said they did not have that
19 information.**
20 Q Did Platte River have access during 2014
21 to the server that housed Secretary Clinton's
22 e-mails to her Clintonemail.com account?

227

1 MR. BREWSTER: Objection. Form.
2 Foundation.
3 **A My understanding is they did in 2014.**
4 Q And was there any discussion as to
5 whether they could obtain Secretary Clinton's
6 e-mails from that server from January 2009 to
7 March 2009?
8 MR. PEZZI: Objection. Beyond the scope.
9 MR. BREWSTER: Objection. Beyond the
10 scope.
11 And to the extent that you can answer the
12 question without divulging attorney-client
13 privileged communications, you may answer.
14 **A I did ask them, and they said they did
15 not have any e-mails from that period.**
16 Q Let me ask you, why did Secretary Clinton
17 provide the e-mails in hard-copy form, rather than
18 in their original electronic form to the State
19 Department?
20 MR. BREWSTER: To the extent you can
21 answer that question without divulging
22 attorney-client privilege, you may answer.

228

1 **A Our understanding was that was the State
2 Department's policy at the time.**
3 Q And who told you that that was the State
4 Department's policy at the time?
5 MR. BREWSTER: Same objection.
6 Q And this, the time frame is December of
7 2014. Is that what you're referring to when you
8 say "at the time"?
9 **A So I -- I learned that in my capacity as
10 her attorney. I did not have conversations with
11 the State Department directly on this.**
12 Q Did -- were there any discussions with
13 State Department officials, either Richard Visek
14 or anybody else at the State Department, with
15 respect to the e-mails being provided to the State
16 Department in their original format, the
17 electronic form, as opposed to hard copies?
18 MR. BREWSTER: Objection. Form.
19 Foundation.
20 **A I'm -- I'm trying to remember. There may
21 have been subsequent conversations about that.
22 But I was not involved in those conversations.**