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April 12, 2017

Mark A. Lemley
Durie Tangri LLP
217 Leidesdorff Street
San Francisco, CA 94111

Marcia Hoffman
Zeitgeist Law PC
25 Taylor Street
San Francisco, CA 94102

Re: Alfa Bank

Dear Mr. Lemley and Ms. Hoffman:

Thank you for your March 28, 2017 letter responding to my request that Professor L. Jean Camp preserve evidence related to my client Alfa Bank. As noted in our initial letter, Alfa Bank is very concerned about suspicious activity that has occurred over the last several months that appears designed to create the false impression that it has a secretive relationship with the Trump Organization.

Alfa Bank's concern is twofold. *First*, Alfa Bank is very troubled by the possibility that a third party may have improperly obtained confidential domain name server (DNS) logs from Alfa Bank and/or counterparty DNS servers, and may have released select portions of those logs in an effort to further this false impression. *Second*, Alfa Bank is disturbed by the possibility that a third party has been attempting to manufacture the appearance of DNS traffic between Alfa Bank and the Trump Organization.

Alfa Bank takes seriously any malicious cyber-activity targeting its computer network, any misinformation that is disseminated regarding its business, and any attempt to damage its reputation. As any business would do in the face of such an attack, Alfa Bank is simply trying to gather all of the facts regarding this suspicious activity without having to resort to formal legal action. Professor Camp has been and remains a central figure in this matter, and any relevant evidence that she has in her possession—inculcating or exculpating—is undeniably relevant and should be preserved.

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We do not know who first obtained the unverified DNS logs that Professor Camp posted on her personal website, which she claims to be evidence of “human communication” between Alfa Bank and the Trump Organization.¹ But the simple reality is that Professor Camp did just that, as you acknowledged in your letter. That same website also contains an extended discussion regarding the questionable “ethics” of posting the DNS logs. Since last year, Professor Camp has repeatedly encouraged an “investigation” into Alfa Bank’s nonexistent relationship with the Trump Organization,² and malicious cyber-attacks designed to manufacture a link between Alfa Bank and the Trump Organization have increased in frequency and intensity.³

Given the above and the many questions that have been raised in the media about this subject, including questions about Professor Camp’s role and motivations, we hope that you would be willing to work with us to get to the bottom of this unfortunate situation. To that end, we ask that you provide us with answers to the following questions:

1. Where and how did Professor Camp obtain the DNS logs that she posted on her personal website?
2. Does Professor Camp possess other DNS logs regarding this matter?
3. If Professor Camp did not personally obtain the DNS logs, then who provided them to her, including the person’s name, job title, and work address?
4. Does Professor Camp know the identity of the person identified in media reporting as “Tea Leaves”? If so, please identify “Tea Leaves” by name, job title, and work address.

To reiterate, our aim here is to get to the bottom of the unfortunate and unfounded allegations that have been made against Alfa Bank, and we hope that you will assist us in that regard. We appreciate your attention to this matter, and look forward to your reply.

¹ L. Jean Camp, *Some Network Data*, <http://ljean.com/NetworkData.php> (last visited Apr. 12, 2017).

² See, e.g., L. Jean Camp, Twitter (Mar. 1, 2017), <https://twitter.com/ljean> (“The data are there and worth investigation. Why did FBI, #NYTimes kill this story before election to focus on Her Emails?”).

³ Alfa Bank, *Press Statement: Alfa Bank confirms it has sought help from U.S. authorities, and discloses new cyberattacks linked to Trump hoax* (Mar. 17, 2017), <http://alfabank.com/media/news/2017/03/17/>.

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Sincerely,

A handwritten signature in black ink that reads "Viet D. Dinh". The signature is written in a cursive, slightly stylized font.

Viet D. Dinh
Counsel for Alfa Bank