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June 21, 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 April 27, 2017 letter responding to our letter of April 12. We asked basic questions regarding the specific factual circumstances by which Professor Camp obtained supposed domain name server (DNS) logs from Alfa Bank and other organizations. We hoped that Professor Camp could explain how she came to possess those unverified, edited, and incomplete DNS logs so that we could investigate suspicious cyber-activity that manufactured the false impression that Alfa Bank has a secretive relationship with the Trump Organization.

Your analysis of the First Amendment and the Communications Decency Act did not answer our basic questions: how, when, and from whom did Professor Camp come to possess the confidential DNS logs that she posted on her webpage titled “Intra Net DNS Leakage”? That webpage—<http://ljean.com/NetworkRecords/intranet/index.html>—lists 28 DNS log entries from September and October 2016 that purport to be from Alfa Bank’s DNS server, along with “analysis” suggesting that the “Alfa Bank network most definitely ha[d] purposeful communications with a hostname registered by the Trump Organization.”

Contrary to your suggestion that “logs of this sort [are] visible on the network,” these DNS logs are not publicly accessible, but are instead private, confidential, and accessible only under stringent confidentiality agreements for the purpose of research. So that there is no confusion, we have attached the relevant alleged DNS logs as Exhibit A to this letter.

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As we are sure you are aware, Internet governance is dependent on a multi-stakeholder model which includes the sharing of objective data on a trusted and strictly confidential basis among researchers and operators. We believe that this privileged position—which is essential to facilitating the normal functioning of the Internet—may, in this case, have been misused for improper purposes with data accessed without permission, and manipulated to manufacture a deceit directed at our client.

Your April 27 response told us only that Professor Camp did not “directly gather any of the DNS traffic information posted on her website” and that “the information was shared among researchers, as is a common practice in the information security field.” But those assertions do not address our core questions about the circumstances by which Professor Camp came to access, possess, peddle, and publish unverified, edited, and confidential computer information, which as far as we can discern was accessed without authorization.

Professor Camp—as a security expert—surely understands our concern that Alfa Bank’s DNS logs were either fabricated or obtained in an improper and unauthorized manner, and that these logs may have been selectively edited and disseminated to manufacture the false impression that Alfa Bank has some sort of “connection” to the Trump Organization. She, like Alfa Bank, may well have been the victim of an elaborate hoax by those who shared this unverified data with her, whom she knows well. Indeed, Professor Camp has already admitted that she knows the agent provocateur known as “Tea Leaves.”¹ And she has acknowledged that she knows the author of a false “dossier” regarding Alfa Bank—which reportedly was “compiled with the exhaustive detail of a political oppo team, not a university researcher”—that was instrumental in sparking this whole unfortunate matter.²

So that we can complete our review of this matter without further delay, we should be most grateful if you would provide specific answers to the following questions:

¹ See Franklin Foer, *Was a Trump Server Communicating With Russia?* Slate (Oct. 31, 2016), <http://slate.me/2rVvYzU> (“‘This is someone I know well and is very well-known in the networking community,’ said Camp [of ‘Tea Leaves’].”)

² See Sam Biddle et al., *Here’s the Problem With the Story Connecting Russia to Donald Trump’s Email Server*, The Intercept (Nov. 1, 2016), <http://bit.ly/2fezLlh> (“Professor L. Jean Camp, an esteemed computer scientist quoted at length in the Slate piece and also interviewed by The Intercept, said she knew the author of the Alfa Bank document—compiled with the exhaustive detail of a political oppo team, not a university researcher—but would not reveal who it was.”).

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1. Where did Professor Camp obtain the DNS logs that we have attached to this letter? When did Professor Camp first receive the DNS logs? In what format did Professor Camp receive the DNS logs?
2. Did Professor Camp obtain these DNS logs from the person identified in media reporting as "Tea Leaves"? Please identify "Tea Leaves" by name, job title, and work address.
3. Did Professor Camp have knowledge when she received the DNS logs from "Tea Leaves" or any other source that they were protected by nondisclosure agreements? Has she learned of any such nondisclosure agreements since receiving the DNS logs? If yes, please describe the circumstances.
4. Has Professor Camp had any communication with the DNS Operations, [redacted] regarding Alfa Bank or its DNS logs? If yes, please describe that communication.
5. Has Professor Camp had any communication with [redacted] regarding Alfa Bank or its DNS logs? If yes, please describe that communication.
6. Has Professor Camp had any communication with [redacted] regarding Alfa Bank or its DNS logs? If yes, please describe that communication.

I repeat our respect for Professor Camp's academic freedom and lawful partisan political activities. We just want to get to the bottom of the false allegations against Alfa Bank and protect its good name as a respected and responsible global enterprise, and we believe that Professor Camp is well positioned to assist us in that effort. We ask only that Professor Camp provide clear and unambiguous answers to our specific questions in order to help put this matter behind all of us as promptly as possible. Thank you.

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Sincerely,

A handwritten signature in black ink, appearing to read "Viet D. Dinh". The signature is fluid and cursive, with the first name "Viet" written in a larger, more prominent script than the last name "Dinh".

Viet D. Dinh
Counsel for Alfa Bank