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March 17, 2017

L. Jean Camp  
School of Informatics & Computing  
Office No. 300  
901 E. 10th St.  
Indiana University  
Bloomington, IN 47405

Re: Notice to Preserve Evidence

Dear Ms. Camp:

I write on behalf of my client, Alfa Bank, a privately owned Russian bank that has recently been the victim of suspicious cyber-activity. This malicious activity appears designed to create the false impression that Alfa Bank has been secretly communicating with the Trump Organization even though Alfa Bank has never had any relationship of any kind with the Trump Organization. Recent media reports indicate that you disclosed certain computer data regarding Alfa Bank to the public last year and encouraged inquiries into supposed links to the Trump Organization.<sup>1</sup> Those same reports suggest that your activities continue to this day to promote an unwarranted investigation into Alfa Bank's "communication" with the Trump Organization.

Alfa Bank is exploring all available options to protect itself from malicious or tortious interference and possible fraudulent activities that wrongfully suggest that Alfa Bank had or maintains a relationship with the Trump Organization. Those options include litigation and causes of action under the federal Computer Fraud and Abuse Act's civil action provision. *See* 18 U.S.C. §1030(g).

Accordingly, this letter serves as notice to you to preserve all records, including Electronically Stored Information ("ESI") and other information in whatever format relating to this matter, including but not limited to: (a) communications between you and the individuals you have publicly identified as a "loose group of concerned nerds" with whom you reportedly worked in concert regarding this matter; (b) communications between you and the anonymous

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<sup>1</sup> *See, e.g.* John Solomon & Sara Carter, *Hilary Clinton Supporter Pushed Trump-Russia Computer Narrative Investigated by FBI*, Circa (Mar. 15, 2017), available at <http://bit.ly/2nbT9XO>.

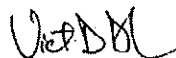
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cyber researcher identified in public reporting as "Tea Leaves" regarding this matter; (c) communications you have posted on social media regarding this matter; (d) communications between you and media outlets regarding this matter; and (e) communications between you and any political campaign, political organization, or any individual or group associated or affiliated with any political campaign or organization regarding this matter. You should take all necessary and immediate steps to preserve both tangible materials and ESI relating to these and all other discoverable topics. This preservation request is ongoing and should continue until a final resolution of this matter.

If you are represented by counsel, please refer this correspondence to your attorney, and please provide us with contact information for your attorney so that we can follow-up accordingly. Thank you.

Sincerely,



Viet D. Dinh

*Counsel for Alfa Bank*