

**From:** Aldenberg, William B. (NH) (FBI)<wbaldenberg@fbi.gov>  
**Sent on:** Friday, February 12, 2021 12:15:07 AM  
**To:** Keromytis, Angelos D<angelos@gatech.edu>; Aldenberg, William (JMD)<William.Aldenberg@usdoj.gov>; DeFilippis, Andrew (JMD)<Andrew.DeFilippis2@usdoj.gov>  
**Subject:** [EXTERNAL EMAIL] - Re: Interview with Angelos Keromytis

Angelos

Thank you for the information and taking the time to speak with us today.

Bill

-

On Feb 11, 2021 3:41 PM, "Keromytis, Angelos D" <angelos@gatech.edu> wrote:  
In case these help, since you asked related questions:

- First time I met Dave Dagon (that I have a record for) is on November 2015, at DARPA. Probably some emails prior/leading up to that, as I was doing the planning for the EA program (what datasets exist, what is technical possible/plausible, etc.)
- First time I met Rodney Joffe (again, that I have a record for) is on April 2016; intent was to find out about what data Neustar has/had that might be helpful to the program. Had a couple of follow-ons (not sure if meetings or phone calls) in June.
- First discussion with FBI (NCIJTF) about EA around February 2016. (We had prior interactions, going back to March 2015, about a different program.)
- First discussion with NSD/DoJ about EA ~December 2015 (although maybe also October 2015).

(These are from my calendar, so I have limited context.)

-Angelos

> On Feb 10, 2021, at 8:15 PM, Aldenberg, William (JMD) <William.Aldenberg@usdoj.gov> wrote:

>

> Angelos

>

> The meeting info is below.

>

> Thank you

>

> Bill

>

> Sent from my iPhone

>

> Begin forwarded message:

>

>> From: "Arsenault, Kori (USACT)" <karsenault@usa.doj.gov>

>> Date: February 10, 2021 at 6:30:47 PM EST

>> To: "Aldenberg, William (JMD)" <waldenberg@jmd.usdoj.gov>

>> Subject: Interview with Angelos Keromytis

>>

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**Sent on:** Friday, February 12, 2021 12:15:07 AM  
**To:** Keromytis, Angelos D<angelos@gatech.edu>; Aldenberg, William (JMD)<William.Aldenberg@usdoj.gov>; DeFilippis, Andrew (JMD)<Andrew.DeFilippis2@usdoj.gov>  
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>> Date: February 10, 2021 at 6:30:47 PM EST

>> To: "Aldenberg, William (JMD)" <waldenberg@jmd.usdoj.gov>

>> Subject: Interview with Angelos Keromytis

>>

From: "Antonakakis, Manos" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7E6B0AFC581E477DB35A37C3A3A79AEB-ANTONAKAKIS>  
Sent on: Wednesday, September 6, 2017 1:19:30 AM  
To: Aaron, David (NSD) <David.Aaron2@usdoj.gov>; [REDACTED]  
CC: Myers, Zachary (USAMD) <Zachary.Myers@usdoj.gov>; Mitchell, Nicolas (USAMD) <Nicolas.Mitchell@usdoj.gov>; Keromytis, Angelos <angelos.keromytis@darpa.mil>  
Subject: Re: DOJ contact - Case #2

Hey David, very pleased to meet you Sir.

Dave Dagon (CCed) and I are working on a full report for you. We expect to have this ready by the 15th, however, this depends on both the load at the Georgia Tech cluster and the findings as more analysis comes to us from the Attribution Framework.

Please stay tuned --- we will pass information to you asap.

BTW, can you guys use PGP at all?

Cheers,

—  
Manos Antonakakis | manos@gatech.edu  
Georgia Institute of Technology  
FF7D 4FDF 9115 8077 92D2 5B59 5120 5E89 BE1B 3668

---

From: Aaron, David (NSD) <David.Aaron2@usdoj.gov>  
Sent: Tuesday, September 5, 2017 6:22:32 PM  
To: Antonakakis, Manos  
Cc: Myers, Zachary (USAMD); Mitchell, Nicolas (USAMD); Keromytis, Angelos  
Subject: DOJ contact - Case #2

Manos,

Angelos passed along your email address. I'm his contact at DOJ for Case #2. I wanted to introduce myself in case we have additional information or follow-up questions. I've copied my colleagues, Zach Myers and Nick Mitchell.

Thank you very much for your work on this.

-David

David Aaron  
U.S. Department of Justice  
(202) 307-5190

From: Keromytis, Angelos <angelos.keromytis@darpa.mil>

Sent on: Wednesday, September 6, 2017 12:38:49 AM

To: Aaron, David (NSD) <David.Aaron2@usdoj.gov>

CC: Antonakakis, Manos <manos@gatech.edu>; ██████████ Myers, Zachary (USAMD) <Zachary.Myers@usdoj.gov>;

Mitchell, Nicolas (USAMD) <Nicolas.Mitchell@usdoj.gov>

Signed by: KEROMYTIS.ANGELOS.D.1501999799 on Wednesday, September 6, 2017 12:38:44 AM

Subject: Re: DOJ contact - Case #2

Attachments: Nameless.txt (1.59 KB)

**From:** "Keromytis, Angelos D" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8F339093DC3C4BC7B981913B18F6BCFB-KEROMYTIS\_A>  
**Sent on:** Friday, February 12, 2021 1:38:36 AM  
**To:** Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>  
**CC:** Aldenberg, William (JMD) <William.Aldenberg@usdoj.gov>; DeFilippis, Andrew (JMD) <Andrew.DeFilippis2@usdoj.gov>  
**Subject:** Re: [EXTERNAL EMAIL] - Re: Interview with Angelos Keromytis

No problem, feel free to reach out if I can help with anything else.

On Feb 11, 2021, at 19:15, Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov> wrote:

Angelos

Thank you for the information and taking the time to speak with us today.

Bill

-

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> The meeting info is below.

>  
> Thank you  
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> Bill  
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>> To: "Aldenberg, William (JMD)" <waldenberg@jmd.usdoj.gov>  
>> Subject: Interview with Angelos Keromytis  
>>  
>>  
>> -- Do not delete or change any of the following text. --  
>>  
>> When it's time, join your Webex meeting here.  
>>  
>>  
>> Join meeting<  
<https://usao.webex.com/usao/j.php?MTID=m55b5d90407dccb738475e7b0f93cb1a7>>  
>>  
>> More ways to join:  
>>  
>> Join from the meeting link  
>> <https://usao.webex.com/usao/j.php?MTID=m55b5d90407dccb738475e7b0f93cb1a7>  
>>  
>>  
>> Join by meeting number  
>> Meeting number (access code): 199 859 3736  
>> Meeting password: UqVshRcp362  
>>  
>> Tap to join from a mobile device (attendees only)  
>> +1-929-251-9612,,1998593736## <tel:%2B1-929-251-9612,,\*01\*1998593736%23%23\*01\*>  
USA Toll 2  
>> +1-415-527-5035,,1998593736## <tel:%2B1-415-527-5035,,\*01\*1998593736%23%23\*01\*>  
US Toll  
>>  
>> Join by phone  
>> +1-929-251-9612 USA Toll 2  
>> +1-415-527-5035 US Toll  
>> Global call-in numbers<  
<https://usao.webex.com/usao/globalcallin.php?MTID=m21b20fbab4af75f730b728900d31a653>  
>  
>>  
>> Join from a video system or application  
>> Dial 1998593736@usao.webex.com<sip:1998593736@usao.webex.com>  
>> You can also dial 207.182.190.20 and enter your meeting number.  
>>  
>>  
>> Join using Microsoft Lync or Microsoft Skype for Business  
>> Dial 1998593736.usao@lync.webex.com<sip:1998593736.usao@lync.webex.com>

From: Wasch, Kate <kate.wasch@legal.gatech.edu>  
Sent on: Monday, July 6, 2020 8:11:20 PM  
To: Antonakakis, Manos <manos@gatech.edu>  
CC: Nie, Ling-Ling <linglingnie@gatech.edu>; David Dagon [REDACTED]; Connolly, Robert <robert.connolly@police.gatech.edu>  
Subject: Re: [Tim.Fuhrman@usdoj.gov: FW: Possible Interview]

Of course. I'm happy to have a conversation.

Kate

> On Jul 6, 2020, at 3:07 PM, Antonakakis, Manos <manos@gatech.edu> wrote:  
>  
> Hey Kate and Ling-Ling,  
>  
> Dave is looking for some advice. Can we please provide some guidance to our researcher on how he should reply back to the DoJ investigator?  
>  
> Chief; all these are just FYI-  
>  
> Thanks,  
>  
> --  
> Manos Antonakakis, Ph.D. | manos@gatech.edu  
> College of Engineering Dean's Professorship Chair and Associate Professor  
> Co-Director Center for Cyber Operations Enquiry and Unconventional Sensing (COEUS)  
> School of Electrical and Computer Engineering | Georgia Institute of Technology  
> FF7D 4FDF 9115 8077 92D2 5B59 5120 5E89 BE1B 3668  
>  
>> On Jul 6, 2020, at 2:42 PM, dagon [REDACTED] > wrote:  
>>  
>> Hi,  
>>  
>> I previously forwarded an email to you from Tim Fuhrman, before the  
>> holiday on June 30, 2020. I just received the message below.  
>>  
>> Is there any update?  
>>  
>> ----- Forwarded message from "Fuhrman, Tim (JMD)" <Tim.Fuhrman@usdoj.gov> -----  
>>  
>> Date: Mon, 6 Jul 2020 17:48:52 +0000  
>> From: "Fuhrman, Tim (JMD)" <Tim.Fuhrman@usdoj.gov>  
>> To: [REDACTED]  
>> [REDACTED]  
>> CC: "Fuhrman, Timothy J. (MO) (FBI)" <TJFUHRMAN@fbi.gov>  
>> Subject: FW: Possible Interview  
>> Message-ID: <CY1P110MB0373932A5FD75121EF61F45B9F690@CY1P110MB0373.NAMP110.PROD.OUTLOOK.COM>  
>> Content-Type: multipart/alternative;  
>> boundary="\_000\_CY1P110MB0373932A5FD75121EF61F45B9F690CY1P110MB0373NAMP\_"  
>>  
>> Mr. Dagon- I am forwarding the attached email which I sent to you last week. That email was preceded by three voicemail messages left for you to determine if you would agree to a voluntary interview now that Georgia Tech and the Department of Defense have no objection to you doing so. As I am in Washington, DC this week, I can be reached on any of the three numbers listed below or you may feel free to respond to this email address. I hope that I will receive a response from you this time.

From: dagon [REDACTED]  
Sent on: Monday, July 6, 2020 8:18:01 PM  
To: Wasch, Kate <kate.wasch@legal.gatech.edu>  
CC: Antonakakis, Manos <manos@gatech.edu>; Nie, Ling-Ling <linglingnie@gatech.edu>; Connolly, Robert <robert.connolly@police.gatech.edu>  
Subject: Re: [Tim.Fuhrman@usdoj.gov: FW: Possible Interview]

On Mon, Jul 06, 2020 at 07:11:20PM +0000, Wasch, Kate wrote:

> Of course. I'm happy to have a conversation.

Thanks everyone. Kate, is there a time I might call?

--

David Dagon  
[REDACTED]



From: "Antonakakis, Manos" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7E6B0AFC581E477DB35A37C3A3A79AEB-ANTONAKAKIS>  
Sent on: Monday, May 4, 2020 3:24:54 PM  
To: Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>  
CC: Knotts, Robert B <knotts@gatech.edu>  
Subject: Re: Address update

Thank you Dave, moving you to BCC.

Mr. Fuhrman, my cell phone number is [REDACTED] You can call me or you can talk directly to Mr. Knotts (CCed), who is the Exec Dir-Federal Relations for Georgia Tech at (202) 756-3670.

Thanks,

—  
Dr. Manos Antonakakis | Associate Professor | manos@gatech.edu  
School of Electrical and Computer Engineering  
Georgia Institute of Technology  
FF7D 4FDF 9115 8077 92D2 5B59 5120 5E89 BE1B 3668

---

From: Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>  
Sent: Monday, May 4, 2020 10:03 AM  
To: dagon  
Cc: Antonakakis, Manos  
Subject: Re: Address update

Mr. Dagon- thanks for getting back to me. At your convenience, Could you or Mr. Antonokakis provide me with a phone number where I can contact him? Thank you in advance. Tim Fuhrman

Sent from my iPhone

> On May 1, 2020, at 5:04 PM, dagon [REDACTED] wrote:  
>  
>> On Thu, Apr 30, 2020 at 07:35:18PM +0000, Fuhrman, Tim (JMD) wrote:  
>>  
>> Mr. Dagon- thank you for reaching out to me. I just left you a  
>> message on the phone number you called me on. Look forward to  
>> hearing from you. Tim Fuhrman  
>  
> Hi Tim,  
>  
> Thanks for your call yesterday. As discussed, we're required to  
> work through the school's liaison process. Prof. Manos Antonakakis,  
> addressed above, is my co-PI on research projects and supervises my  
> work in the lab. Tim is with the DOJ, working with an AG review team.  
>  
> As you can imagine, things are very busy at the University right  
> now, given the global pandemic. So can you briefly relay to  
> Prof. Antonakakis the nature of your inquiry? He can then engage our  
> university and federal liaison staff.  
>  
> You noted this concerns the general type of DNS information  
> discussed in this public report:  
>

From: Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>  
Sent on: Monday, May 4, 2020 3:03:58 PM  
To: dagon [REDACTED] >  
CC: manos@gatech.edu  
Subject: Re: Address update

Mr. Dagon- thanks for getting back to me. At your convenience, Could you or Mr. Antonokakis provide me with a phone number where I can contact him? Thank you in advance. Tim Fuhrman

Sent from my iPhone

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> [https://justthenews.com/sites/default/files/2020-04/Ankura\\_AlfaBank\\_ResearchAnalysis\\_Apr2020dh.pdf.pdf.pdf](https://justthenews.com/sites/default/files/2020-04/Ankura_AlfaBank_ResearchAnalysis_Apr2020dh.pdf.pdf.pdf)

>  
> I caution that the above report, commissioned by a foreign entity,  
> suggests that global public iterative DNS data is private, and covered  
> by US federal privacy policies. This is false of course, and would  
> have an enormous impact on the entire DNS security industry, which  
> relies on public DNS data analysis---and that may well have been its  
> intent.

>  
> For that reason, I suspect your inquiry might be relevant to Georgia  
> Tech, and our sponsored research projects. Manos, I know you're busy,  
> but for the reasons I've suggested, this may prove important.

>  
> --  
> David Dagon

> [REDACTED]

“acceptable”! While I was tempted to say back to him “What if this hacker hacked GOP? Would you want me to investigate him then?”, I kept my cool and I told him that this is a question for DARPA’s director, and not for me to answer.

Steve, Chaouki and Ling-Ling; please, try to imagine a “United States of America” where investigations and prosecutions are determined by ideas and political beliefs. This has been tried before in human history and the results of it was forced labor and Gulags.

Folks, I strongly believe we will need this type of research and much more innovation in this space to preserve our democracy. This is factually true for a single yet fundamental reason: data driven scientific attribution is unbiased politically. Data belongs to no political party. Our nation's adversaries will keep attacking our country --- I am certain of this because their attacks simply work and are tremendously impactful to our society.

Thank you and have a great weekend.

PS. I am writing this email on a weekend because this is my first downtime since July 2<sup>nd</sup> when I received the subpoena.

Thanks, Manos

---

**From:** "Nie, Ling-Ling" <linglingnie@gatech.edu>

**Date:** Friday, July 2, 2021 at 7:50 PM

**To:** "Antonakakis, Manos" <manos@gatech.edu>, "McLaughlin, Steven W" <swm@gatech.edu>, "Abdallah, Chaouki T" <ctabdallah@gatech.edu>, "Wasch, Kate" <kate.wasch@legal.gatech.edu>, "Lunon, Darryl" <dl91@gatech.edu>

**Subject:** Re: FGJ Subpoena for Manos Antonakakis

Hi Manos: Thanks for forwarding. I’m copying Kate’s correct email address and adding Darryl. We will confer internally and come back to you early next week as there are some people who are out of the office for the holiday weekend that we will need to loop in.

---

**From:** Antonakakis, Manos <manos@gatech.edu>

**Sent:** Friday, July 2, 2021 2:39 PM

**To:** McLaughlin, Steven W; Abdallah, Chaouki T; kate.wesch@legal.gatech.edu; Nie, Ling-Ling

**Subject:** Fw: FGJ Subpoena for Manos Antonakakis

Hey Steve/Chaouki/Kate/Ling-Ling,

Hope you are doing great! Evidently I need to appear in front of a Grand Jury on July 15th. Any idea if I should talk with GT counsel before or if anyone from GT should be with me in this testimony?

This is a first for me so I am not sure what to do next.

Thanks, Manos

---

**From:** Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>

**Sent:** Friday, July 2, 2021 4:28 PM

**To:** Antonakakis, Manos

**Cc:** kate.wesch@legal.gatech.edu; Fuhrman, Tim (JMD)

**Subject:** FGJ Subpoena for Manos Antonakakis

Dear Mr. Antonakakis - This is Jack Eckenrode, an Investigator with the US Justice Department. Together with my colleague Tim Fuhrman, copied here, with whom you may have had previous contact, we are attaching a federal grand jury subpoena seeking your testimony in Washington, DC on July 15, 2021 at 1:00pm. You should feel free to contact either one of us in the event that you have any questions related to the subpoena or your appearance.

Also copied for her awareness is Kate Wasch, legal counsel from Georgia Tech.

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**To:** Aldenberg, William B. (NH) (FBI)<wbaldenberg@fbi.gov>  
**CC:** Aldenberg, William (JMD)<William.Aldenberg@usdoj.gov>  
**Subject:** Re: DARPA  
**Attachments:** Keromytis - Post-Gov't Employment Brief Cert..pdf (711.78 KB), Post-government Employment Info Letter (2018 Sep 26).pdf (313.62 KB)

Bill,

Per our quick call: I can make myself available for an unclassified call with the assistant attorney(s) next Thursday, 1300-1400 Eastern. Please send me VTC information.

Since (as you also mentioned in your original email, below) you are treating me as a (possible) witness to a matter, I will be attending by myself.

As discussed, it would be helpful to know the general topic(s)/area(s) for discussion, so I can confirm with the DARPA GC what I can speak to wrt proprietary sensitivities -- some contracting matters are DARPA-internal, and there are also some constraints on what I can say about contracts that I was managing that fall under 18 USC. (See attached documents. I don't expect what we'll discuss will fall under these provisions, but do keep it in mind because I will be.)

Thanks,  
-Angelos

> On Feb 4, 2021, at 2:57 PM, Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov> wrote:

>

> Dr. Keromytis

>

> My name is Special Agent Bill Aldenberg with the FBI. I am currently assigned to the Special Counsels office. We would like to speak with you regarding your time at DARPA. You are possibly a witness to a matter we are investigating. Please give me a call when you have a moment. My cell # is 203-868-7487 and my desk number is 203-503-5200. The main # for my office is 203-503-5000.

>

> Kate Wasch from your General Counsel's office was notified that we were going to reach out to you.

>

> Thank you and we look forward to speaking with you.

>

> Bill Aldenberg

> FBI – New Haven

and come back to you early next week as there are some people who are out of the office for the holiday weekend that we will need to loop in.

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---

**From:** Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>

**Sent:** Friday, July 2, 2021 4:28 PM

**To:** Antonakakis, Manos

**Cc:** kate.wesch@legal.gatech.edu; Fuhrman, Tim (JMD)

**Subject:** FGJ Subpoena for Manos Antonakakis

Dear Mr. Antonakakis - This is Jack Eckenrode, an Investigator with the US Justice Department. Together with my colleague Tim Fuhrman, copied here, with whom you may have had previous contact, we are attaching a federal grand jury subpoena seeking your testimony in Washington, DC on July 15, 2021 at 1:00pm. You should feel free to contact either one of us in the event that you have any questions related to the subpoena or your appearance.

Also copied for her awareness is Kate Wasch, legal counsel from Georgia Tech.

Finally, I will leave you with an anecdote and a thought. During one of my interviews with the Special Counsel prosecutor, I was asked point blank by Mr. DeFilippis, "Do you believe that DARPA should be instructing you to investigate the origins of a hacker (Guccifer\_2.0) that hacked a political entity (DNC)?" Let that sync for a moment, folks. Someone hacked a political party (DNC, in this case), in the middle of an election year (2016), and the lead investigator of DoJ's special council would question whether US researchers working for DARPA should conduct investigations in this matter is "acceptable"! While I was tempted to say back to him "What if this hacker hacked GOP? Would you want me to investigate him then?", I kept my cool and I told him that this is a question for DARPA's director, and not for me to answer.

Steve, Chaouki and Ling-Ling; please, try to imagine a "United States of America" where investigations and prosecutions are determined by ideas and political beliefs. This has been tried before in human history and the results of it was forced labor and Gulags.

Folks, I strongly believe we will need this type of research and much more innovation in this space to preserve our democracy. This is factually true for a single yet fundamental reason: data driven scientific attribution is unbiased politically. Data belongs to no political party. Our nation's adversaries will keep attacking our country --- I am certain of this because their attacks simply work and are tremendously impactful to our society.

Thank you and have a great weekend.

PS. I am writing this email on a weekend because this is my first downtime since July 2<sup>nd</sup> when I received the subpoena. Thanks, Manos

---

**From:** "Nie, Ling-Ling" <linglingnie@gatech.edu>

**Date:** Friday, July 2, 2021 at 7:50 PM

**To:** "Antonakakis, Manos" <manos@gatech.edu>, "McLaughlin, Steven W" <swm@gatech.edu>, "Abdallah, Chaouki T" <ctabdallah@gatech.edu>, "Wasch, Kate" <kate.wasch@legal.gatech.edu>, "Lunon, Darryl" <dl91@gatech.edu>

**Subject:** Re: FGJ Subpoena for Manos Antonakakis

Hi Manos: Thanks for forwarding. I'm copying Kate's correct email address and adding Darryl. We will confer internally and come back to you early next week as there are some people who are out of the office for the holiday weekend that we will need to loop in.

---

**From:** Antonakakis, Manos <manos@gatech.edu>

**Sent:** Friday, July 2, 2021 2:39 PM

**To:** McLaughlin, Steven W; Abdallah, Chaouki T; kate.wesch@legal.gatech.edu; Nie, Ling-Ling

**Subject:** Fw: FGJ Subpoena for Manos Antonakakis

Hey Steve/Chaouki/Kate/Ling-Ling,

Hope you are doing great! Evidently I need to appear in front of a Grand Jury on July 15th. Any idea if I should talk with GT counsel before or if anyone from GT should be with me in this testimony?

This is a first for me so I am not sure what to do next.

Thanks, Manos

---

**From:** Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>

**Sent:** Friday, July 2, 2021 4:28 PM

**To:** Antonakakis, Manos

**Cc:** kate.wesch@legal.gatech.edu; Fuhrman, Tim (JMD)

**Subject:** FGJ Subpoena for Manos Antonakakis

Dear Mr. Antonakakis - This is Jack Eckenrode, an Investigator with the US Justice Department. Together with my colleague Tim Fuhrman, copied here, with whom you may have had previous contact, we are attaching a federal grand jury subpoena seeking your testimony in Washington, DC on July 15, 2021 at 1:00pm. You should feel free to contact either one of us in the event that you have any questions related to the subpoena or your appearance.

Also copied for her awareness is Kate Wasch, legal counsel from Georgia Tech.



From: dagon [REDACTED]  
Sent on: Monday, July 6, 2020 8:18:01 PM  
To: Wasch, Kate <kate.wasch@legal.gatech.edu>  
CC: Antonakakis, Manos <manos@gatech.edu>; Nie, Ling-Ling <linglingnie@gatech.edu>; Connolly, Robert <robert.connolly@police.gatech.edu>  
Subject: Re: [Tim.Fuhrman@usdoj.gov: FW: Possible Interview]

On Mon, Jul 06, 2020 at 07:11:20PM +0000, Wasch, Kate wrote:

> Of course. I'm happy to have a conversation.

Thanks everyone. Kate, is there a time I might call?

--

David Dagon

[REDACTED]  
D970 6D9E E500 E877 B1E3 D3F8 5937 48DC 0FDC E717

**From:** "Antonakakis, Manos" </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=7E6B0AFC581E477DB35A37C3A3A79AEB-ANTONAKAKIS>

**Sent on:** Saturday, July 3, 2021 8:09:34 PM

**To:** Nie, Ling-Ling <linglingnie@gatech.edu>; McLaughlin, Steven W <swm@gatech.edu>; Abdallah, Chaouki T <ctabdallah@gatech.edu>; Wasch, Kate <kate.wasch@legal.gatech.edu>; Lunon, Darryl <dl91@gatech.edu>

**Subject:** Re: FGJ Subpoena for Manos Antonakakis

Hey Ling-Ling,

Dave's lawyer would like to talk to me. I am not sure about what,

---

**From:** Antonakakis, Manos <manos@gatech.edu>

**Date:** Friday, July 2, 2021 at 8:01 PM

**To:** Nie, Ling-Ling <linglingnie@gatech.edu>, McLaughlin, Steven W <swm@gatech.edu>, Abdallah, Chaouki T <ctabdallah@gatech.edu>, Wasch, Kate <kate.wasch@legal.gatech.edu>, Lunon, Darryl <dl91@gatech.edu>

**Subject:** Re: FGJ Subpoena for Manos Antonakakis

Much obliged, Ling-Ling.

Thanks, Manos

---

**From:** Nie, Ling-Ling <linglingnie@gatech.edu>

**Sent:** Friday, July 2, 2021 19:50

**To:** Antonakakis, Manos; McLaughlin, Steven W; Abdallah, Chaouki T; Wasch, Kate; Lunon, Darryl

**Subject:** Re: FGJ Subpoena for Manos Antonakakis

Hi Manos: Thanks for forwarding. I'm copying Kate's correct email address and adding Darryl. We will confer internally and come back to you early next week as there are some people who are out of the office for the holiday weekend that we will need to loop in.

---

**From:** Antonakakis, Manos <manos@gatech.edu>

**Sent:** Friday, July 2, 2021 2:39 PM

**To:** McLaughlin, Steven W; Abdallah, Chaouki T; kate.wesch@legal.gatech.edu; Nie, Ling-Ling

**Subject:** Fw: FGJ Subpoena for Manos Antonakakis

Hey Steve/Chaouki/Kate/Ling-Ling,

Hope you are doing great! Evidently I need to appear in front of a Grand Jury on July 15th. Any idea if I should talk with GT counsel before or if anyone from GT should be with me in this testimony?

This is a first for me so I am not sure what to do next.

Thanks, Manos

---

**From:** Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>

**Sent:** Friday, July 2, 2021 4:28 PM

**To:** Antonakakis, Manos

**Cc:** kate.wesch@legal.gatech.edu; Fuhrman, Tim (JMD)

**Subject:** FGJ Subpoena for Manos Antonakakis

Dear Mr. Antonakakis - This is Jack Eckenrode, an Investigator with the US Justice Department. Together with my colleague Tim Fuhrman, copied here, with whom you may have had previous contact, we are attaching a federal grand jury subpoena seeking your testimony in Washington, DC on July 15, 2021 at 1:00pm. You should feel free to contact either one of us in the event that you have any questions related to the subpoena or your appearance.

Thanks, Manos

---

From: Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>  
Sent: Friday, July 2, 2021 4:28 PM  
To: Antonakakis, Manos  
Cc: kate.wesch@legal.gatech.edu; Fuhrman, Tim (JMD)  
Subject: FGJ Subpoena for Manos Antonakakis

Dear Mr. Antonakakis - This is Jack Eckenrode, an Investigator with the US Justice Department. Together with my colleague Tim Fuhrman, copied here, with whom you may have had previous contact, we are attaching a federal grand jury subpoena seeking your testimony in Washington, DC on July 15, 2021 at 1:00pm. You should feel free to contact either one of us in the event that you have any questions related to the subpoena or your appearance.

Also copied for her awareness is Kate Wasch, legal counsel from Georgia Tech.

Sent: Friday, July 2, 2021 2:39 PM

To: McLaughlin, Steven W; Abdallah, Chaouki T; kate.wesch@legal.gatech.edu <mailto:kate.wesch@legal.gatech.edu>; Nie, Ling-Ling

Subject: Fw: FGJ Subpoena for Manos Antonakakis

Hey Steve/Chaouki/Kate/Ling-Ling,

Hope you are doing great! Evidently I need to appear in front of a Grand Jury on July 15th. Any idea if I should talk with GT counsel before or if anyone from GT should be with me in this testimony?

This is a first for me so I am not sure what to do next.

Thanks, Manos

---

From: Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov <mailto:John.Eckenrode@usdoj.gov>>

Sent: Friday, July 2, 2021 4:28 PM

To: Antonakakis, Manos

Cc: kate.wesch@legal.gatech.edu <mailto:kate.wesch@legal.gatech.edu>; Fuhrman, Tim (JMD)

Subject: FGJ Subpoena for Manos Antonakakis

Dear Mr. Antonakakis - This is Jack Eckenrode, an Investigator with the US Justice Department. Together with my colleague Tim Fuhrman, copied here, with whom you may have had previous contact, we are attaching a federal grand jury subpoena seeking your testimony in Washington, DC on July 15, 2021 at 1:00pm. You should feel free to contact either one of us in the event that you have any questions related to the subpoena or your appearance.

Also copied for her awareness is Kate Wasch, legal counsel from Georgia Tech.

From: Antonakakis, Manos <manos@gatech.edu>  
Sent on: Thursday, July 8, 2021 4:07:13 PM  
To: Connolly, Robert <robert.connolly@police.gatech.edu>  
Subject: Fw: Response to Subpoena

Just FYI- Chief. I forwarded this to Ling-Ling and Kate.

Thanks, Manos

---

From: Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>  
Sent: Thursday, July 8, 2021 10:54 AM  
To: Antonakakis, Manos  
Cc: Wasch, Kate  
Subject: Response to Subpoena

Professor Antonakakis- as a follow up to the email containing a subpoena for your testimony on Thursday, July 15th to a sitting grand jury in the District of Columbia, sent to you by my colleague, Jack Eckenrode, last Friday, July 2nd and the two voicemails I left on your work phone last Friday, July 2nd and yesterday, July 7th, to which we have not received any response, I am sending this email to determine if you will accept service of the referenced subpoena. In the event we do not receive a timely response from you regarding this matter, it may be necessary to serve you personally at your residence or place of employment. You may respond to this email address or contact me on one of the telephone numbers listed below. I have also copied Kate Wasch of Georgia Tech's Legal Affairs Department regarding this matter.

Timothy J. Fuhrman  
Investigator  
Durham Special Counsel Team  
202-616-1470 (Office)  
202-532-3557 (Cell)  
202-307-2388 (SCIF)

---

**From:** EYoung@LAW.GA.GOV  
**Sent:** Monday, August 2, 2021 9:52 AM  
**To:** MSchamel@lowenstein.com; AJara@lowenstein.com  
**Subject:** FW: Rhannusia Logs

Mark and Ana,

Before we respond to this, I thought I'd check to see if your client has any concern about production of the Rhannusia chat logs (attached). Please let me know asap if there is anything you think we should know before we respond.

Thanks,  
Beth

Beth Young  
Assistant Attorney General  
Office of the Attorney General Chris Carr Government Services & Employment  
(404) 458-3425  
eyoung@law.ga.gov  
Georgia Department of Law  
40 Capitol Square SW  
Atlanta, Georgia 30334

-----Original Message-----

**From:** DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
**Sent:** Monday, August 2, 2021 8:23 AM  
**To:** Elizabeth Young <EYoung@LAW.GA.GOV>  
**Cc:** Kate Wasch <kate.wasch@legal.gatech.edu>; Jody R Westby <westby@globalcyberlegal.com>; Mark D. Rasch <rasch@globalcyberlegal.com>; Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Scarpelli, Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Patel, Neeraj (USACT) <Neeraj.Patel@usdoj.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Maddock, Adam M. (CyD) (FBI) <ammaddock@fbi.gov>  
**Subject:** Re: Rhannusia Logs

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Beth,

Will you be able to produce to us today the Rhannusia chats that Mr. Dagon identified? We request that you produce them in their entirety, as we believe based on representations from Mr. Dagon and his counsel that entire set of logs is pertinent to our investigation. If necessary we can provide you with a subpoena for the full set of logs. Let us know. Thanks.

> On Jul 30, 2021, at 10:02 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:

>

> I reached out to Ms. Westby after our call yesterday and she confirmed that Mr. Dagon has copies of these chat logs and will be forwarding them to us so that we can review and produce them.

>

> Beth Young

> Assistant Attorney General

> Office of the Attorney General Chris Carr Government Services &

> Employment

> (404) 458-3425

> eyoung@law.ga.gov

> Georgia Department of Law

> 40 Capitol Square SW

> Atlanta, Georgia 30334

>

>

>

> -----Original Message-----

> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>

> Sent: Friday, July 30, 2021 7:43 AM

> To: Elizabeth Young <EYoung@LAW.GA.GOV>; Kate Wasch

> <kate.wasch@legal.gatech.edu>; Jody R Westby

> <westby@globalcyberlegal.com>; Mark D. Rasch

> <rasch@globalcyberlegal.com>

> Cc: Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Scarpelli,

> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Keilty, Michael

> (USANYE) <Michael.Keilty@usdoj.gov>; Patel, Neeraj (USACT)

> <Neeraj.Patel@usdoj.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;

> Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Maddock, Adam

> M. (CyD) (FBI) <ammaddock@fbi.gov>

> Subject: Rhannusia Logs

>

> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

>

>

> All,

>

> As we have discussed with each of you, Mr. Dagon has identified "Rhannusia" chat communications that we understand are responsive to our subpoena and relevant to our investigation. We would like to obtain these communications promptly and would also like to minimize the burdens on all involved.

>

> Beth, can you please confirm in response to this email that Georgia Tech authorizes and requests that Mr. Dagon provide those logs to the government as an employee of Georgia Tech? If you would like us to issue a subpoena for them specifically and will accept service, we can do so today.

>

> Jody/Mark, can you please let us know when Mr. Dagon can provide the logs to us or, alternatively, to Georgia Tech for production to us?

>

> We are hopeful that we can find a solution to this issue in the near term and avoid unnecessary legal process or disruptions.

>

---

**From:** Jara, Ana <AJara@lowenstein.com>  
**Sent:** Friday, July 30, 2021 1:03 PM  
**To:** Wasch, Kate  
**Cc:** Elizabeth Young  
**Subject:** RE: Dr. Antonakakis

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Yes, I forwarded the invite. Let me know, Beth, if you have any trouble.

**Ana Jara**  
She | Her | Hers  
Counsel  
Lowenstein Sandler LLP  
  
T: 202.753.3747  
F: 973.597.2400

---

**From:** Wasch, Kate  
**Sent:** Friday, July 30, 2021 1:01 PM  
**To:** Jara, Ana  
**Cc:** Elizabeth Young  
**Subject:** RE: Dr. Antonakakis

Hi, Ana. Can you add Beth to the call? I do not plan to attend.  
Kate

---

**From:** Jara, Ana <[AJara@lowenstein.com](mailto:AJara@lowenstein.com)>  
**Sent:** Friday, July 30, 2021 10:21 AM  
**To:** DeFilippis, Andrew (USANYS) <[Andrew.DeFilippis@usdoj.gov](mailto:Andrew.DeFilippis@usdoj.gov)>  
**Cc:** Schamel, Mark <[MSchamel@lowenstein.com](mailto:MSchamel@lowenstein.com)>; Wasch, Kate <[kate.wasch@legal.gatech.edu](mailto:kate.wasch@legal.gatech.edu)>; Eckenrode, John (JMD) <[John.Eckenrode@usdoj.gov](mailto:John.Eckenrode@usdoj.gov)>; Aldenberg, William B. (NH) (FBI) <[wbaldenberg@fbi.gov](mailto:wbaldenberg@fbi.gov)>; Keilty, Michael (USANYE) <[Michael.Keilty@usdoj.gov](mailto:Michael.Keilty@usdoj.gov)>; Scarpelli, Anthony (USADC) <[Anthony.Scarpelli@usdoj.gov](mailto:Anthony.Scarpelli@usdoj.gov)>; Patel, Neeraj (USACT) <[Neeraj.Patel@usdoj.gov](mailto:Neeraj.Patel@usdoj.gov)>; Maddock, Adam M. (CyD) (FBI) <[ammaddock@fbi.gov](mailto:ammaddock@fbi.gov)>; Beutler, Kristen M. (CG) (FBI) <[kmbeutler@fbi.gov](mailto:kmbeutler@fbi.gov)>; Fuhrman, Tim (JMD) <[Tim.Fuhrman@usdoj.gov](mailto:Tim.Fuhrman@usdoj.gov)>  
**Subject:** RE: Dr. Antonakakis

Done.

**Ana Jara**  
She | Her | Hers



Counsel  
Lowenstein Sandler LLP

T: 202.753.3747  
F: 973.597.2400

---

**From:** DeFilippis, Andrew (USANYS) <[Andrew.DeFilippis@usdoj.gov](mailto:Andrew.DeFilippis@usdoj.gov)>  
**Sent:** Friday, July 30, 2021 10:14 AM  
**To:** Jara, Ana <[AJara@lowenstein.com](mailto:AJara@lowenstein.com)>  
**Cc:** Schamel, Mark <[MSchamel@lowenstein.com](mailto:MSchamel@lowenstein.com)>; [kate.wasch@legal.gatech.edu](mailto:kate.wasch@legal.gatech.edu); Eckenrode, John (JMD) <[John.Eckenrode@usdoj.gov](mailto:John.Eckenrode@usdoj.gov)>; Aldenberg, William B. (NH) (FBI) <[wbaldenberg@fbi.gov](mailto:wbaldenberg@fbi.gov)>; Keilty, Michael (USANYE) <[Michael.Keilty@usdoj.gov](mailto:Michael.Keilty@usdoj.gov)>; Scarpelli, Anthony (USADC) <[Anthony.Scarpelli@usdoj.gov](mailto:Anthony.Scarpelli@usdoj.gov)>; Patel, Neeraj (USACT) <[Neeraj.Patel@usdoj.gov](mailto:Neeraj.Patel@usdoj.gov)>; Maddock, Adam M. (CyD) (FBI) <[ammaddock@fbi.gov](mailto:ammaddock@fbi.gov)>; Beutler, Kristen M. (CG) (FBI) <[kmbeutler@fbi.gov](mailto:kmbeutler@fbi.gov)>; Fuhrman, Tim (JMD) <[Tim.Fuhrman@usdoj.gov](mailto:Tim.Fuhrman@usdoj.gov)>  
**Subject:** Re: Dr. Antonakakis

Thanks, would you mind adding Tim Fuhrman (copied) as well?

On Jul 30, 2021, at 10:09 AM, Jara, Ana <[AJara@lowenstein.com](mailto:AJara@lowenstein.com)> wrote:

I sent the calendar invite to all on this group along with Manos. Talk to you all then.

Best,  
Ana

**Ana Jara**  
She | Her | Hers  
Counsel  
Lowenstein Sandler LLP

T: 202.753.3747  
F: 973.597.2400

---

**From:** Schamel, Mark <[MSchamel@lowenstein.com](mailto:MSchamel@lowenstein.com)>  
**Sent:** Friday, July 30, 2021 10:07 AM  
**To:** DeFilippis, Andrew (USANYS) <[Andrew.DeFilippis@usdoj.gov](mailto:Andrew.DeFilippis@usdoj.gov)>  
**Cc:** Jara, Ana <[AJara@lowenstein.com](mailto:AJara@lowenstein.com)>; [kate.wasch@legal.gatech.edu](mailto:kate.wasch@legal.gatech.edu); Eckenrode, John (JMD) <[John.Eckenrode@usdoj.gov](mailto:John.Eckenrode@usdoj.gov)>; Aldenberg, William B. (NH) (FBI) <[wbaldenberg@fbi.gov](mailto:wbaldenberg@fbi.gov)>; Keilty, Michael (USANYE) <[Michael.Keilty@usdoj.gov](mailto:Michael.Keilty@usdoj.gov)>; Scarpelli, Anthony (USADC) <[Anthony.Scarpelli@usdoj.gov](mailto:Anthony.Scarpelli@usdoj.gov)>; Patel, Neeraj (USACT) <[Neeraj.Patel@usdoj.gov](mailto:Neeraj.Patel@usdoj.gov)>; Maddock, Adam M. (CyD) (FBI) <[ammaddock@fbi.gov](mailto:ammaddock@fbi.gov)>; Beutler, Kristen M. (CG) (FBI) <[kmbeutler@fbi.gov](mailto:kmbeutler@fbi.gov)>  
**Subject:** Re: Dr. Antonakakis

We can start at 1.  
Will send an invite now.

**Mark E. Schamel**  
Partner  
Lowenstein Sandler LLP

T: 202.753.3805  
M: 202.841.3401  
F: 973.597.2400



On Jul 30, 2021, at 7:24 AM, Schamel, Mark <[MSchamel@lowenstein.com](mailto:MSchamel@lowenstein.com)> wrote:

Will confirm as soon as I hear from Manos.

**Mark E. Schamel**  
Partner  
Lowenstein Sandler LLP

T: 202.753.3805  
M: 202.841.3401  
F: 973.597.2400



On Jul 30, 2021, at 7:08 AM, DeFilippis, Andrew (USANYS)  
<[Andrew.DeFilippis@usdoj.gov](mailto:Andrew.DeFilippis@usdoj.gov)> wrote:

Ok thank you, that works for us.

On Jul 30, 2021, at 7:04 AM, Schamel, Mark  
<[MSchamel@lowenstein.com](mailto:MSchamel@lowenstein.com)> wrote:

Andrew  
I can move some things around and do 1230 to 255. I  
will check with Ana and Manos.  
Mark

**Mark E. Schamel**  
Partner  
Lowenstein Sandler LLP

T: 202.753.3805  
M: 202.841.3401  
F: 973.597.2400



On Jul 29, 2021, at 6:26 PM, DeFilippis,  
Andrew (USANYS)  
<[Andrew.DeFilippis@usdoj.gov](mailto:Andrew.DeFilippis@usdoj.gov)> wrote:

Mark,

Thank you, could we do the WebEx  
some time after noon? We are tied up  
in the morning.

On Jul 29, 2021, at 3:01  
PM, Schamel, Mark  
<[MSchamel@lowenstein.com](mailto:MSchamel@lowenstein.com)> wrote:

Andrew et al

I know you are all quite  
excited about speaking  
with Manos, so we will  
send out a WebEx invite  
for tomorrow morning  
at 915 am. Given that  
you have now  
appropriately  
categorized Dr.  
Antonakakis as a  
witness and indicated  
your willingness to  
meet with him  
informally rather than  
in a Grand Jury, we are

---

**From:** Jara, Ana <AJara@lowenstein.com>  
**Sent:** Monday, August 2, 2021 6:45 PM  
**To:** Elizabeth Young; Schamel, Mark  
**Subject:** RE: Rhannusia Logs

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Crazy day but apologies for the late response. Let me check with Manos now and will get back to you.

-----Original Message-----

From: Elizabeth Young <EYoung@LAW.GA.GOV>  
Sent: Monday, August 2, 2021 9:52 AM  
To: Schamel, Mark <MSchamel@lowenstein.com>; Jara, Ana <AJara@lowenstein.com>  
Subject: FW: Rhannusia Logs

Mark and Ana,

Before we respond to this, I thought I'd check to see if your client has any concern about production of the Rhamnousia chat logs (attached). Please let me know asap if there is anything you think we should know before we respond.

Thanks,  
Beth

Beth Young  
Assistant Attorney General  
Office of the Attorney General Chris Carr Government Services & Employment  
(404) 458-3425  
eyoung@law.ga.gov  
Georgia Department of Law  
40 Capitol Square SW  
Atlanta, Georgia 30334

-----Original Message-----

From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
Sent: Monday, August 2, 2021 8:23 AM  
To: Elizabeth Young <EYoung@LAW.GA.GOV>  
Cc: Kate Wasch <kate.wasch@legal.gatech.edu>; Jody R Westby <westby@globalcyberlegal.com>; Mark D. Rasch <rasch@globalcyberlegal.com>; Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Scarpelli, Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Patel, Neeraj (USACT) <Neeraj.Patel@usdoj.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Maddock, Adam M. (CyD) (FBI) <ammaddock@fbi.gov>  
Subject: Re: Rhannusia Logs

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Beth,

Will you be able to produce to us today the Rhannousia chats that Mr. Dagon identified? We request that you produce them in their entirety, as we believe based on representations from Mr. Dagon and his counsel that entire set of logs is pertinent to our investigation. If necessary we can provide you with a subpoena for the full set of logs. Let us know. Thanks.

> On Jul 30, 2021, at 10:02 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:

>  
> I reached out to Ms. Westby after our call yesterday and she confirmed that Mr. Dagon has copies of these chat logs and will be forwarding them to us so that we can review and produce them.

>  
> Beth Young  
> Assistant Attorney General  
> Office of the Attorney General Chris Carr Government Services &  
> Employment  
> (404) 458-3425  
> eyoung@law.ga.gov  
> Georgia Department of Law  
> 40 Capitol Square SW  
> Atlanta, Georgia 30334

>  
>  
>

> -----Original Message-----

> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
> Sent: Friday, July 30, 2021 7:43 AM  
> To: Elizabeth Young <EYoung@LAW.GA.GOV>; Kate Wasch  
> <kate.wasch@legal.gatech.edu>; Jody R Westby  
> <westby@globalcyberlegal.com>; Mark D. Rasch  
> <rasch@globalcyberlegal.com>  
> Cc: Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Scarpelli,  
> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Keilty, Michael  
> (USANYE) <Michael.Keilty@usdoj.gov>; Patel, Neeraj (USACT)  
> <Neeraj.Patel@usdoj.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;  
> Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Maddock, Adam  
> M. (CyD) (FBI) <ammaddock@fbi.gov>  
> Subject: Rhannusia Logs

>  
> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

>  
>  
> All,  
>

> As we have discussed with each of you, Mr. Dagon has identified "Rhannusia" chat communications that we understand are responsive to our subpoena and relevant to our investigation. We would like to obtain these communications promptly and would also like to minimize the burdens on all involved.

**Christian Fuller**

Senior Counsel, Employment & Litigation  
Georgia Institute of Technology  
Phone: 404-403-8204  
[christian.fuller@legal.gatech.edu](mailto:christian.fuller@legal.gatech.edu)

---

**From:** Lopes, Crane <[Crane.Lopes@darpa.mil](mailto:Crane.Lopes@darpa.mil)>  
**Sent:** Tuesday, July 20, 2021 2:16 PM  
**To:** DeFilippis, Andrew (USANYS) <[Andrew.DeFilippis@usdoj.gov](mailto:Andrew.DeFilippis@usdoj.gov)>; Elizabeth Young <[EYoung@LAW.GA.GOV](mailto:EYoung@LAW.GA.GOV)>  
**Cc:** Fuller, Christian <[christian.fuller@legal.gatech.edu](mailto:christian.fuller@legal.gatech.edu)>; Wasch, Kate <[kate.wasch@legal.gatech.edu](mailto:kate.wasch@legal.gatech.edu)>; Nie, Ling-Ling <[linglingnie@gatech.edu](mailto:linglingnie@gatech.edu)>; Keilty, Michael (USANYE) <[Michael.Keilty@usdoj.gov](mailto:Michael.Keilty@usdoj.gov)>; Patel, Neeraj (USACT) <[Neeraj.Patel@usdoj.gov](mailto:Neeraj.Patel@usdoj.gov)>; Scarpelli, Anthony (USADC) <[Anthony.Scarpelli@usdoj.gov](mailto:Anthony.Scarpelli@usdoj.gov)>; Eckenrode, John (JMD) <[John.Eckenrode@usdoj.gov](mailto:John.Eckenrode@usdoj.gov)>; Aldenberg, William B. (NH) (FBI) <[wbaldenberg@fbi.gov](mailto:wbaldenberg@fbi.gov)>; Maddock, Adam M. (CyD) (FBI) <[ammaddock@fbi.gov](mailto:ammaddock@fbi.gov)>; James, Ryan Joseph (INSD) (FBI) <[rjames@fbi.gov](mailto:rjames@fbi.gov)>; Bennett, Wes <[wes.bennett@darpa.mil](mailto:wes.bennett@darpa.mil)>; Smith, Darin <[Darin.Smith@darpa.mil](mailto:Darin.Smith@darpa.mil)>  
**Subject:** RE: DARPA

Ms. Young:

Thank you for your diligence in protecting DARPA-related records and other documents from unauthorized use or disclosure.

I have discussed this matter with Wes Bennett, the Director of the DARPA Contracts Management Office. Mr. Bennett is info-copied on this message. We request that you cooperate with the Department of Justice (DoJ) by immediately providing them with all DARPA-related unclassified documents and records in your possession and that are requested by their subpoena.

If DoJ has requested DARPA-related classified documents and records in your possession, release should be coordinated with Mr. Darin Smith, DARPA Security & Intelligence Directorate. Mr. Smith is info-copied on this message.

Please contact me if I can assist you.

Crane Lopes, Ph.D.  
General Counsel  
DARPA  
Off | 571.218.4887 ☎  
Mob | 571.239.5084



Creating **BREAKTHROUGH TECHNOLOGIES**  
For National Security

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**From:** DeFilippis, Andrew (USANYS) <[Andrew.DeFilippis@usdoj.gov](mailto:Andrew.DeFilippis@usdoj.gov)>  
**Sent:** Tuesday, July 20, 2021 10:51 AM  
**To:** Elizabeth Young <[EYoung@LAW.GA.GOV](mailto:EYoung@LAW.GA.GOV)>

**Cc:** 'Fuller, Christian' <[christian.fuller@legal.gatech.edu](mailto:christian.fuller@legal.gatech.edu)>; Wasch, Kate <[kate.wasch@legal.gatech.edu](mailto:kate.wasch@legal.gatech.edu)>; Ling-Ling Nie ([linglingnie@gatech.edu](mailto:linglingnie@gatech.edu)) <[linglingnie@gatech.edu](mailto:linglingnie@gatech.edu)>; Lopes, Crane <[Crane.Lopes@darpa.mil](mailto:Crane.Lopes@darpa.mil)>; Keilty, Michael (USANYE) <[Michael.Keilty@usdoj.gov](mailto:Michael.Keilty@usdoj.gov)>; Patel, Neeraj (USACT) <[Neeraj.Patel@usdoj.gov](mailto:Neeraj.Patel@usdoj.gov)>; Scarpelli, Anthony (USADC) <[Anthony.Scarpelli@usdoj.gov](mailto:Anthony.Scarpelli@usdoj.gov)>; Eckenrode, John (JMD) <[John.Eckenrode@usdoj.gov](mailto:John.Eckenrode@usdoj.gov)>; Aldenberg, William B. (NH) (FBI) <[wbaldenberg@fbi.gov](mailto:wbaldenberg@fbi.gov)>; Maddock, Adam M. (CyD) (FBI) <[ammaddock@fbi.gov](mailto:ammaddock@fbi.gov)>; James, Ryan Joseph (INSD) (FBI) <[rjames@fbi.gov](mailto:rjames@fbi.gov)>

**Subject:** DARPA

Ms. Young,

Thank you very much for our call earlier today. On that call, you requested that we provide assurance that the Defense Advanced Research Projects Agency (DARPA) has no objection to Georgia Tech's providing documents and other records in response to our federal grand jury subpoena that relate to a contract between Georgia Tech and DARPA. I am copying Crane Lopes, General Counsel of DARPA. Mr. Lopes and DARPA have been fully cooperative with and supportive of our investigative efforts. On a phone call that occurred a few minutes ago, Mr. Lopes has assured me again that DARPA has no objections to Georgia Tech's provision of any records or information (both classified and unclassified) to our team and to the grand jury.

As noted, federal law requires you to provide such records regardless of any potentially applicable contractual restrictions.

Please let me know if you have any questions. We would appreciate if you could also please confirm that you consent to the two Georgia Tech employees we discussed providing responsive records that they have identified. Thank you.

Andrew J. DeFilippis  
Assistant Special Counsel  
U.S. Department of Justice  
(646) 530-0087

---

This message contains confidential information, intended only for the person(s) named above, which may also be privileged. Any use, distribution, copying or disclosure by any other person is strictly prohibited. In such case, you should delete this message and kindly notify the sender via reply e-mail. Please advise immediately if you or your employer does not consent to Internet e-mail for messages of this kind.

---

**From:** EYoung@LAW.GA.GOV  
**Sent:** Thursday, July 29, 2021 4:17 PM  
**To:** Andrew.DeFilippis@usdoj.gov  
**Subject:** Accepted: Special Counsel/Georgia Tech  
**Attachments:** attachment.ics



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**From:** DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
**Sent:** Tuesday, July 20, 2021 10:24 PM  
**To:** Elizabeth Young; Mark Rasch; Jody R Westby; 'Fuller, Christian'; Wasch, Kate  
**Cc:** Eckenrode, John (JMD); Aldenberg, WilliamB. (NH) (FBI); Fuhrman, Tim (JMD); Keilty, Michael (USANYE); Scarpelli, Anthony (USADC); Patel, Neeraj (USACT)  
**Subject:** Call Tomorrow (Special Counsel Investigation)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good Evening Counsel for Georgia Tech and Counsel for David Dagon,

We hope all is well. Can you please let us know when you are available for a joint call tomorrow -- preferably at either 11:30 AM, 2:20 PM or 3:30 PM? We would like to discuss your clients' compliance with recently issued federal grand jury subpoenas. It is important that we have this call to ensure timely and comprehensive compliance with the subpoenas. Thanks very much.

The Special Counsel Team

---

**From:** DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
**Sent:** Tuesday, July 20, 2021 10:51 AM  
**To:** Elizabeth Young  
**Cc:** 'Fuller, Christian'; Wasch, Kate; Ling-Ling Nie (linglingnie@gatech.edu); Lopes, Crane; Keilty, Michael (USANYE); Patel, Neeraj (USACT); Scarpelli, Anthony (USADC); Eckenrode, John (JMD); Aldenberg, William B.(NH) (FBI); Maddock, Adam M. (CyD) (FBI); James, Ryan Joseph (INSD) (FBI)  
**Subject:** DARPA

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ms. Young,

Thank you very much for our call earlier today. On that call, you requested that we provide assurance that the Defense Advanced Research Projects Agency (DARPA) has no objection to Georgia Tech's providing documents and other records in response to our federal grand jury subpoena that relate to a contract between Georgia Tech and DARPA. I am copying Crane Lopes, General Counsel of DARPA. Mr. Lopes and DARPA have been fully cooperative with and supportive of our investigative efforts. On a phone call that occurred a few minutes ago, Mr. Lopes has assured me again that DARPA has no objections to Georgia Tech's provision of any records or information (both classified and unclassified) to our team and to the grand jury.

As noted, federal law requires you to provide such records regardless of any potentially applicable contractual restrictions.

Please let me know if you have any questions. We would appreciate if you could also please confirm that you consent to the two Georgia Tech employees we discussed providing responsive records that they have identified. Thank you.

Andrew J. DeFilippis  
Assistant Special Counsel  
U.S. Department of Justice  
(646) 530-0087

---

**From:** eyoung@law.ga.gov  
**Sent:** Wednesday, July 28, 2021 11:02 AM  
**To:** eyoung@law.ga.gov; andrew.defilippis@usdoj.gov  
**Subject:** Link to Kiteworks Folder

## Kiteworks

Elizabeth Young sent a message related to the "Georgia Tech - Documents Produced in Response to Grand Jury Subpoena" folder

[Access folder](#)

Here is a link to a Kiteworks folder containing Georgia Tech's production of documents in response to the Grand Jury Subpoena:

[Redacted link]

Secured by **Kiteworks**

This message requires that you sign in to access the folder and any files in it.

---

**From:** DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
**Sent:** Thursday, July 29, 2021 4:20 PM  
**To:** Elizabeth Young  
**Cc:** Fuller, Christian; Wasch, Kate; Eckenrode, John (JMD); Aldenberg, William B. (NH) (FBI); Fuhrman, Tim (JMD); Keilty, Michael (USANYE); Scarpelli, Anthony(USADC); Patel, Neeraj (USACT)  
**Subject:** Re: Call Tomorrow (Special Counsel Investigation)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Let's use the dial in below at 4:30. Sorry I left it off the last invite.

Dial-in

Conference ID: [REDACTED]

On Jul 29, 2021, at 10:45 AM, Elizabeth Young wrote:

We are working on responding to the issues you've raised in this and your previous email. Sometime late afternoon would be best - would 4:00 work for you?

Beth Young  
Assistant Attorney General  
Office of the Attorney General Chris Carr  
Government Services & Employment  
(404) 458-3425  
mailto:eyoung@law.ga.gov  
Georgia Department of Law  
40 Capitol Square SW  
Atlanta, Georgia 30334

-----Original Message-----

From: DeFilippis, Andrew (USANYS)  
Sent: Thursday, July 29, 2021 6:44 AM  
To: Elizabeth Young

---

**From:** DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
**Sent:** Thursday, July 29, 2021 12:38 PM  
**To:** Elizabeth Young  
**Cc:** Wasch, Kate; Aldenberg, William B. (NH)(FBI); Fuhrman, Tim (JMD); Keilty, Michael (USANYE); Scarpelli, Anthony(USADC); Patel, Neeraj (USACT)  
**Subject:** Re: Call Tomorrow (Special Counsel Investigation)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

OK

> On Jul 29, 2021, at 12:25 PM, Elizabeth Young <EYoung@law.ga.gov> wrote:

>  
>  
> I now have a call that I need to take at 4, so could we make it 4:30?

>  
>  
> Beth Young  
> Assistant Attorney General  
> Office of the Attorney General Chris Carr Government Services &  
> Employment  
> (404) 458-3425  
> eyoung@law.ga.gov  
> Georgia Department of Law  
> 40 Capitol Square SW  
> Atlanta, Georgia 30334

>  
>  
>  
> -----Original Message-----

> From: Elizabeth Young  
> Sent: Thursday, July 29, 2021 10:45 AM  
> To: 'DeFilippis, Andrew (USANYS)' <Andrew.DeFilippis@usdoj.gov>  
> Cc: Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch, Kate  
> <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)  
> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)  
> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;  
> Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli,  
> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj (USACT)  
> <Neeraj.Patel@usdoj.gov>  
> Subject: RE: Call Tomorrow (Special Counsel Investigation)

>  
>  
> We are working on responding to the issues you've raised in this and your previous email. Sometime late afternoon would be best - would 4:00 work for you?

>  
> Beth Young  
> Assistant Attorney General  
> Office of the Attorney General Chris Carr Government Services &  
> Employment  
> (404) 458-3425  
> mailto:eyoung@law.ga.gov  
> Georgia Department of Law  
> 40 Capitol Square SW  
> Atlanta, Georgia 30334

>  
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>  
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>  
>  
>  
> -----Original Message-----

> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
> Sent: Thursday, July 29, 2021 6:44 AM  
> To: Elizabeth Young <EYoung@LAW.GA.GOV>  
> Cc: Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch, Kate  
> <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)  
> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)  
> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;  
> Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli,  
> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj (USACT)  
> <Neeraj.Patel@usdoj.gov>  
> Subject: Re: Call Tomorrow (Special Counsel Investigation)

>  
> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

>  
>  
> Beth,

>  
> The white papers and related documents you produced to us are documents that \*we\* provided to Dr. Antonakakis's counsel for their client's review. That is where his counsel obtained them. It appears you have not located any responsive documents. We are also told by Mr. Dagon's counsel that he pointed you to a number of responsive records. We further understand that Michael Farrell likely has responsive documents. When are you available for a call today to discuss?

>  
> We may need a Georgia Tech custodian to testify in grand jury next week about the steps taken to search for responsive records. Let us know some times today when you are free.

>  
> Thanks.

>  
>  
>> On Jul 28, 2021, at 10:59 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:

>>  
>> I am sending you via Kiteworks a link to a folder containing the documents that Georgia Tech is able to produce with regard to the three categories of documents you asked us to search for during our 7/21 phone conference as follows:  
>>

>> 1. White papers/analytical papers related to Trump/Alfa Bank/Yotaphone: We are providing copies of several white papers and related documents that we received via counsel for Dr. Antonakakis. We are not certain as to the origin and storage history of these documents and therefore cannot provide authentication for these documents as business records of Georgia Tech.

>>

>> 2. Email communications related to Trump/Alfa Bank/Yotaphone: You asked us to revisit our prior email production to ensure that no responsive communications had been overlooked in our earlier email response. A new search was conducted using the original search terms listed in the earlier subpoena, and added white papers and analytical papers to the request. The search did identify a number of emails that were not included in the initial production, although they appear to be irrelevant and are predominantly junk mail. However, I am providing them to you in order to demonstrate Tech's compliance with your request.

>>

>> 3. You indicated that there was a "fairly large file of Trump related materials" that had been assembled for production to the office of Special Counsel Robert Muller or the DOJ. We are unable to locate such a file. I have been informed that Dr. Antonakakis has searched his server for such a file and did not find anything meeting that description.

>>

>> If you would like me to add any additional recipients to the Kiteworks folder, please let me know.

>>

>> Thank you,

>>

>> Beth Young

>> Assistant Attorney General

>> Office of the Attorney General Chris Carr Government Services &

>> Employment

>> (404) 458-3425

>> <mailto:eyoung@law.ga.gov>

>> Georgia Department of Law

>> 40 Capitol Square SW

>> Atlanta, Georgia 30334

>>

>>

>>

>>

>>

>>

>>

>> -----Original Message-----

>> From: DeFilippis, Andrew (USANYS) <[Andrew.DeFilippis@usdoj.gov](mailto:Andrew.DeFilippis@usdoj.gov)>

>> Sent: Wednesday, July 28, 2021 6:37 AM

>> To: Elizabeth Young <[EYoung@LAW.GA.GOV](mailto:EYoung@LAW.GA.GOV)>

>> Cc: Fuller, Christian <[christian.fuller@legal.gatech.edu](mailto:christian.fuller@legal.gatech.edu)>; Wasch,

>> Kate <[kate.wasch@legal.gatech.edu](mailto:kate.wasch@legal.gatech.edu)>; Eckenrode, John (JMD)

>> <[John.Eckenrode@usdoj.gov](mailto:John.Eckenrode@usdoj.gov)>; Aldenberg, William B. (NH) (FBI)

>> <[wbaldenberg@fbi.gov](mailto:wbaldenberg@fbi.gov)>; Fuhrman, Tim (JMD) <[Tim.Fuhrman@usdoj.gov](mailto:Tim.Fuhrman@usdoj.gov)>;

>> Keilty, Michael (USANYE) <[Michael.Keilty@usdoj.gov](mailto:Michael.Keilty@usdoj.gov)>; Scarpelli,

>> Anthony (USADC) <[Anthony.Scarpelli@usdoj.gov](mailto:Anthony.Scarpelli@usdoj.gov)>; Patel, Neeraj (USACT)

>> <[Neeraj.Patel@usdoj.gov](mailto:Neeraj.Patel@usdoj.gov)>

>> Subject: Re: Call Tomorrow (Special Counsel Investigation)

>>

>> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

>>

>>

>> Good morning Beth,

>>

>> You had said on Friday that you hoped to start producing documents on Monday. Can we expect to receive them today? Thanks.

>>

>>>> On Jul 23, 2021, at 9:31 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:

>>>

>>> That's fine. Talk to you then.

>>>

>>> Beth Young

>>> Assistant Attorney General

>>> Office of the Attorney General Chris Carr Government Services &

>>> Employment

>>> (404) 458-3425

>>> eyoung@law.ga.gov

>>> Georgia Department of Law

>>> 40 Capitol Square SW

>>> Atlanta, Georgia 30334

>>>

>>>

>>>

>>>

>>> -----Original Message-----

>>> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>

>>> Sent: Friday, July 23, 2021 9:08 AM

>>> To: Elizabeth Young <EYoung@LAW.GA.GOV>

>>> Cc: Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch,

>>> Kate <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)

>>> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)

>>> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;

>>> Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli,

>>> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj (USACT)

>>> <Neeraj.Patel@usdoj.gov>

>>> Subject: Re: Call Tomorrow (Special Counsel Investigation)

>>>

>>> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

>>>

>>>

>>> Can we say 4:30? Thank you.

>>>

>>>>> On Jul 23, 2021, at 8:59 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:

>>>>

>>>> I'm booked up this morning but available after lunch - how about 2:30? If that doesn't work let me know what does.

>>>>

>>>>

>>>> Beth Young

>>>> Assistant Attorney General

>>>> Office of the Attorney General Chris Carr Government Services &

>>>> Employment

>>>> (404) 458-3425



>>>> eyoung@law.ga.gov  
>>>> Georgia Department of Law  
>>>> 40 Capitol Square SW  
>>>> Atlanta, Georgia 30334

>>>>  
>>>>  
>>>>

>>>> -----Original Message-----

>>>> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
>>>> Sent: Thursday, July 22, 2021 10:17 PM  
>>>> To: Elizabeth Young <EYoung@LAW.GA.GOV>  
>>>> Cc: Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch,  
>>>> Kate <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)  
>>>> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)  
>>>> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;  
>>>> Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli,  
>>>> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj  
>>>> (USACT) <Neeraj.Patel@usdoj.gov>  
>>>> Subject: Re: Call Tomorrow (Special Counsel Investigation)

>>>> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

>>>>  
>>>>  
>>>> Beth,  
>>>> We hope all is well. Can you let us know some times tomorrow when you would be available for an update call?

>>>>  
>>>> Thank you.

>>>>  
>>>>  
>>>>

>>>>> On Jul 21, 2021, at 8:07 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:  
>>>>> I'm available for a call at 3:30 today. Please let me know what number you'd like me to call.

>>>>> Elizabeth (Beth) Young  
>>>>> Assistant Attorney General  
>>>>> Office of the Attorney General Chris Carr Government Services &  
>>>>> Employment  
>>>>> (404) 458-3425  
>>>>> eyoung@law.ga.gov

>>>>> Georgia Department of Law  
>>>>> 40 Capitol Square SW  
>>>>> Atlanta, Georgia 30334

>>>>> -----Original Message-----

>>>>> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
>>>>> Sent: Wednesday, July 21, 2021 7:05 AM  
>>>>> To: Jody R Westby <westby@globalcyberlegal.com>  
>>>>> Cc: Elizabeth Young <EYoung@LAW.GA.GOV>; Mark Rasch  
>>>>> <rasch@globalcyberlegal.com>; Fuller, Christian  
>>>>> <christian.fuller@legal.gatech.edu>; Wasch, Kate  
>>>>> <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)  
>>>>> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)  
>>>>> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;

>>>> Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli,  
>>>> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj  
>>>> (USACT) <Neeraj.Patel@usdoj.gov>  
>>>> Subject: RE: Call Tomorrow (Special Counsel Investigation)  
>>>> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless  
you recognize the sender and know the content is safe.  
>>>> Jody, It is unfortunate that you are not willing to join a call with Georgia Tech's counsel for purposes of efficiency  
and to avoid delaying compliance with federal subpoenas. Regardless, can we please speak at 11:30 AM with you and  
Mark? Beth, would you then be available for a separate call with our team at either 2:30 PM or 3:30 PM?  
>>>> -----Original Message-----  
>>>> From: Jody R Westby <westby@globalcyberlegal.com>  
>>>> Sent: Tuesday, July 20, 2021 11:23 PM  
>>>> To: DeFilippis, Andrew (USANYS) <ADeFilippis@usa.doj.gov>  
>>>> Cc: Elizabeth Young <EYoung@LAW.GA.GOV>; Mark Rasch  
>>>> <rasch@globalcyberlegal.com>; Fuller, Christian  
>>>> <christian.fuller@legal.gatech.edu>; Wasch, Kate  
>>>> <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)  
>>>> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)  
>>>> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;  
>>>> Keilty, Michael (USANYE) <MKeilty@usa.doj.gov>; Scarpelli, Anthony  
>>>> (USADC) <AScarpelli@usa.doj.gov>; Patel, Neeraj (USACT)  
>>>> <npatel2@usa.doj.gov>  
>>>> Subject: Re: Call Tomorrow (Special Counsel Investigation) Dear  
>>>> Andrew:  
>>>> We appreciate that you need the documents / data subject to the subpoenas to Georgia Tech. However, we are  
not a party to those subpoenas and have no knowledge of them. We are not the custodian of records for Georgia Tech,  
and our client is not the Principal Investigator on the DARPA contract or a professor of the College of Electrical  
Engineering. We have indicated that we do not believe that Mr. Dagon has any responsive Georgia Tech documents /  
data in his personal capacity. While our client may be helpful in pointing Georgia Tech to documents or data relevant to  
their subpoenas (if we are informed of their contents), responsibility for compliance lies with Georgia Tech. We  
respectfully request that the Special Counsel's team work with each party that it is seeking evidence from and not ask us  
to get in the middle. Georgia Tech needs to determine how it wants to respond to the subpoenas; we are more than  
happy to provide any assistance that would be useful to them.  
>>>> We hope you understand that we are trying to be cooperative. We would be happy to have a call with you and  
your team separately if that would be helpful.  
>>>> Best regards,  
>>>> Jody  
>>>> Jody R Westby, Esq.  
>>>> Managing Principal  
>>>> Global Cyber Legal LLC  
>>>> +1.202.255.2700  
>>>> westby@globalcyberlegal.com  
>>>> <https://protect2.fireeye.com/v1/url?k=7211baee-2d8a821e-72169e0b-a>  
>>>> c  
>>>> 1  
>>>> f  
>>>> 6  
>>>> b0176b0-2941286214a1b996&q=1&e=3db575fb-ac73-4426-bd1f-7b6d618c069  
>>>> d & u = <http://3A%2F%2Fwww.globalcyberlegal.com%2F>  
>>>>> On Jul 20, 2021, at 10:24 PM, DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov> wrote:  
>>>>> Good Evening Counsel for Georgia Tech and Counsel for David Dagon,

---

**From:** DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
**Sent:** Wednesday, July 28, 2021 11:39 AM  
**To:** Elizabeth Young  
**Cc:** Fuller, Christian; Wasch, Kate; Eckenrode, John (JMD); Aldenberg, William B. (NH) (FBI); Fuhrman, Tim (JMD); Keilty, Michael (USANYE); Scarpelli, Anthony (USADC); Patel, Neeraj (USACT); Moak, Joyce (JMD); Royce, Jane (JMD); Royce, Jane (USACT)  
**Subject:** Re: Call Tomorrow (Special Counsel Investigation)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Beth,

Thank you. We will discuss your assertions below. Can you please add Joyce Moak and Jane Royce (copied) to the Kiteworks site? Also, we have been informed that there is an internal chat system at Georgia Tech. Did you search that system for responsive records? If not, please do so. Also, can you assure us that you searched and produced any pertinent Georgia Tech documents in the custody of Angelos Keromytis and other employees or students involved in the DARPA contract? If not, please ensure that you conduct searches to include documents of all relevant persons. As we noted, the categories of documents we provided to you on our call were not an exclusive list and you are obligated to search for documents more broadly to comply with the subpoena.

Thanks.

> On Jul 28, 2021, at 10:59 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:

>

> I am sending you via Kiteworks a link to a folder containing the documents that Georgia Tech is able to produce with regard to the three categories of documents you asked us to search for during our 7/21 phone conference as follows:

>

> 1. White papers/analytical papers related to Trump/Alfa Bank/Yotaphone: We are providing copies of several white papers and related documents that we received via counsel for Dr. Antonakakis. We are not certain as to the origin and storage history of these documents and therefore cannot provide authentication for these documents as business records of Georgia Tech.

>

> 2. Email communications related to Trump/Alfa Bank/Yotaphone: You asked us to revisit our prior email production to ensure that no responsive communications had been overlooked in our earlier email response. A new search was conducted using the original search terms listed in the earlier subpoena, and added white papers and analytical papers to the request. The search did identify a number of emails that were not included in the initial production, although they appear to be irrelevant and are predominantly junk mail. However, I am providing them to you in order to demonstrate Tech's compliance with your request.

>

> 3. You indicated that there was a "fairly large file of Trump related materials" that had been assembled for production to the office of Special Counsel Robert Muller or the DOJ. We are unable to locate such a file. I have been informed that Dr. Antonakakis has searched his server for such a file and did not find anything meeting that description.

>

> If you would like me to add any additional recipients to the Kiteworks folder, please let me know.

>  
> Thank you,  
>  
> Beth Young  
> Assistant Attorney General  
> Office of the Attorney General Chris Carr Government Services &  
> Employment  
> (404) 458-3425  
> <mailto:eyoung@law.ga.gov>  
> Georgia Department of Law  
> 40 Capitol Square SW  
> Atlanta, Georgia 30334

>  
>  
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>  
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>  
>  
> -----Original Message-----

> From: DeFilippis, Andrew (USANYS) <[Andrew.DeFilippis@usdoj.gov](mailto:Andrew.DeFilippis@usdoj.gov)>  
> Sent: Wednesday, July 28, 2021 6:37 AM  
> To: Elizabeth Young <[EYoung@LAW.GA.GOV](mailto:EYoung@LAW.GA.GOV)>  
> Cc: Fuller, Christian <[christian.fuller@legal.gatech.edu](mailto:christian.fuller@legal.gatech.edu)>; Wasch, Kate  
> <[kate.wasch@legal.gatech.edu](mailto:kate.wasch@legal.gatech.edu)>; Eckenrode, John (JMD)  
> <[John.Eckenrode@usdoj.gov](mailto:John.Eckenrode@usdoj.gov)>; Aldenberg, William B. (NH) (FBI)  
> <[wbaldenberg@fbi.gov](mailto:wbaldenberg@fbi.gov)>; Fuhrman, Tim (JMD) <[Tim.Fuhrman@usdoj.gov](mailto:Tim.Fuhrman@usdoj.gov)>;  
> Keilty, Michael (USANYE) <[Michael.Keilty@usdoj.gov](mailto:Michael.Keilty@usdoj.gov)>; Scarpelli,  
> Anthony (USADC) <[Anthony.Scarpelli@usdoj.gov](mailto:Anthony.Scarpelli@usdoj.gov)>; Patel, Neeraj (USACT)  
> <[Neeraj.Patel@usdoj.gov](mailto:Neeraj.Patel@usdoj.gov)>  
> Subject: Re: Call Tomorrow (Special Counsel Investigation)

>  
> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

>  
>  
> Good morning Beth,

>  
> You had said on Friday that you hoped to start producing documents on Monday. Can we expect to receive them today? Thanks.

>  
>> On Jul 23, 2021, at 9:31 AM, Elizabeth Young <[EYoung@law.ga.gov](mailto:EYoung@law.ga.gov)> wrote:

>>  
>> That's fine. Talk to you then.

>>  
>> Beth Young  
>> Assistant Attorney General  
>> Office of the Attorney General Chris Carr Government Services &  
>> Employment  
>> (404) 458-3425  
>> [eyoung@law.ga.gov](mailto:eyoung@law.ga.gov)  
>> Georgia Department of Law  
>> 40 Capitol Square SW

>> Atlanta, Georgia 30334

>>

>>

>>

>>

>> -----Original Message-----

>> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>

>> Sent: Friday, July 23, 2021 9:08 AM

>> To: Elizabeth Young <EYoung@LAW.GA.GOV>

>> Cc: Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch,

>> Kate <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)

>> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)

>> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;

>> Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli,

>> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj (USACT)

>> <Neeraj.Patel@usdoj.gov>

>> Subject: Re: Call Tomorrow (Special Counsel Investigation)

>>

>> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

>>

>>

>> Can we say 4:30? Thank you.

>>

>>>> On Jul 23, 2021, at 8:59 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:

>>>>

>>>> I'm booked up this morning but available after lunch - how about 2:30? If that doesn't work let me know what does.

>>>>

>>>>

>>>> Beth Young

>>>> Assistant Attorney General

>>>> Office of the Attorney General Chris Carr Government Services &

>>>> Employment

>>>> (404) 458-3425

>>>> eyoung@law.ga.gov

>>>> Georgia Department of Law

>>>> 40 Capitol Square SW

>>>> Atlanta, Georgia 30334

>>>>

>>>>

>>>>

>>>> -----Original Message-----

>>>> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>

>>>> Sent: Thursday, July 22, 2021 10:17 PM

>>>> To: Elizabeth Young <EYoung@LAW.GA.GOV>

>>>> Cc: Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch,

>>>> Kate <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)

>>>> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)

>>>> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;

>>>> Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli,

>>>> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj (USACT)

>>>> <Neeraj.Patel@usdoj.gov>

>>> Subject: Re: Call Tomorrow (Special Counsel Investigation)

>>>

>>> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

>>>

>>>

>>> Beth,

>>> We hope all is well. Can you let us know some times tomorrow when you would be available for an update call?

>>>

>>> Thank you.

>>>

>>>

>>>

>>>> On Jul 21, 2021, at 8:07 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:

>>>> I'm available for a call at 3:30 today. Please let me know what number you'd like me to call.

>>>> Elizabeth (Beth) Young

>>>> Assistant Attorney General

>>>> Office of the Attorney General Chris Carr Government Services &

>>>> Employment

>>>> (404) 458-3425

>>>> eyoung@law.ga.gov

>>>> Georgia Department of Law

>>>> 40 Capitol Square SW

>>>> Atlanta, Georgia 30334

>>>> -----Original Message-----

>>>> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>

>>>> Sent: Wednesday, July 21, 2021 7:05 AM

>>>> To: Jody R Westby <westby@globalcyberlegal.com>

>>>> Cc: Elizabeth Young <EYoung@LAW.GA.GOV>; Mark Rasch

>>>> <rasch@globalcyberlegal.com>; Fuller, Christian

>>>> <christian.fuller@legal.gatech.edu>; Wasch, Kate

>>>> <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)

>>>> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)

>>>> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;

>>>> Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli,

>>>> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj

>>>> (USACT) <Neeraj.Patel@usdoj.gov>

>>>> Subject: RE: Call Tomorrow (Special Counsel Investigation)

>>>> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

>>>> Jody, It is unfortunate that you are not willing to join a call with Georgia Tech's counsel for purposes of efficiency and to avoid delaying compliance with federal subpoenas. Regardless, can we please speak at 11:30 AM with you and Mark? Beth, would you then be available for a separate call with our team at either 2:30 PM or 3:30 PM?

>>>> -----Original Message-----

>>>> From: Jody R Westby <westby@globalcyberlegal.com>

>>>> Sent: Tuesday, July 20, 2021 11:23 PM

>>>> To: DeFilippis, Andrew (USANYS) <ADeFilippis@usa.doj.gov>

>>>> Cc: Elizabeth Young <EYoung@LAW.GA.GOV>; Mark Rasch

>>>> <rasch@globalcyberlegal.com>; Fuller, Christian

>>>> <christian.fuller@legal.gatech.edu>; Wasch, Kate

>>>> <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)

>>>> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)

>>>> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;

>>>> Keilty, Michael (USANYE) <MKeilty@usa.doj.gov>; Scarpelli, Anthony

>>>> (USADC) <AScarpelli@usa.doj.gov>; Patel, Neeraj (USACT)

>>>> <npatel2@usa.doj.gov>

>>>> Subject: Re: Call Tomorrow (Special Counsel Investigation) Dear

>>>> Andrew:

>>>> We appreciate that you need the documents / data subject to the subpoenas to Georgia Tech. However, we are not a party to those subpoenas and have no knowledge of them. We are not the custodian of records for Georgia Tech, and our client is not the Principal Investigator on the DARPA contract or a professor of the College of Electrical Engineering. We have indicated that we do not believe that Mr. Dagon has any responsive Georgia Tech documents / data in his personal capacity. While our client may be helpful in pointing Georgia Tech to documents or data relevant to their subpoenas (if we are informed of their contents), responsibility for compliance lies with Georgia Tech. We respectfully request that the Special Counsel's team work with each party that it is seeking evidence from and not ask us to get in the middle. Georgia Tech needs to determine how it wants to respond to the subpoenas; we are more than happy to provide any assistance that would be useful to them.

>>>> We hope you understand that we are trying to be cooperative. We would be happy to have a call with you and your team separately if that would be helpful.

>>>> Best regards,

>>>> Jody

>>>> Jody R Westby, Esq.

>>>> Managing Principal

>>>> Global Cyber Legal LLC

>>>> +1.202.255.2700

>>>> westby@globalcyberlegal.com

>>>> <https://protect2.fireeye.com/v1/url?k=7211baee-2d8a821e-72169e0b-ac>

>>>> 1

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>>>> b0176b0-2941286214a1b996&q=1&e=3db575fb-ac73-4426-bd1f-7b6d618c069d

>>>> & u = <http%3A%2F%2Fwww.globalcyberlegal.com%2F>

>>>>> On Jul 20, 2021, at 10:24 PM, DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov> wrote:

>>>> Good Evening Counsel for Georgia Tech and Counsel for David Dagon,

>>>> We hope all is well. Can you please let us know when you are available for a joint call tomorrow -- preferably at either 11:30 AM, 2:20 PM or 3:30 PM? We would like to discuss your clients' compliance with recently issued federal grand jury subpoenas. It is important that we have this call to ensure timely and comprehensive compliance with the subpoenas. Thanks very much.

>>>> The Special Counsel Team

---

**From:** Elizabeth Young <eyoung@law.ga.gov>  
**Sent:** Wednesday, July 21, 2021 8:07 AM  
**To:** 'DeFilippis, Andrew (USANYS)'; Jody R Westby  
**Cc:** Mark Rasch; Fuller, Christian; Wasch, Kate; Eckenrode, John (JMD); Aldenberg, William B. (NH) (FBI); Fuhrman, Tim (JMD); Keilty, Michael (USANYE); Scarpelli, Anthony (USADC); Patel, Neeraj (USACT)  
**Subject:** RE: Call Tomorrow (Special Counsel Investigation)

I'm available for a call at 3:30 today. Please let me know what number you'd like me to call.

Elizabeth (Beth) Young  
Assistant Attorney General  
Office of the Attorney General Chris Carr Government Services & Employment  
(404) 458-3425  
eyoung@law.ga.gov  
Georgia Department of Law  
40 Capitol Square SW  
Atlanta, Georgia 30334

-----Original Message-----

From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
Sent: Wednesday, July 21, 2021 7:05 AM  
To: Jody R Westby <westby@globalcyberlegal.com>  
Cc: Elizabeth Young <EYoung@LAW.GA.GOV>; Mark Rasch <rasch@globalcyberlegal.com>; Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch, Kate <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>; Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli, Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj (USACT) <Neeraj.Patel@usdoj.gov>  
Subject: RE: Call Tomorrow (Special Counsel Investigation)

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Jody, It is unfortunate that you are not willing to join a call with Georgia Tech's counsel for purposes of efficiency and to avoid delaying compliance with federal subpoenas. Regardless, can we please speak at 11:30 AM with you and Mark? Beth, would you then be available for a separate call with our team at either 2:30 PM or 3:30 PM?

-----Original Message-----

From: Jody R Westby <westby@globalcyberlegal.com>  
Sent: Tuesday, July 20, 2021 11:23 PM  
To: DeFilippis, Andrew (USANYS) <ADeFilippis@usa.doj.gov>  
Cc: Elizabeth Young <EYoung@LAW.GA.GOV>; Mark Rasch <rasch@globalcyberlegal.com>; Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch, Kate <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)



<John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>; Keilty, Michael (USANYE) <MKeilty@usa.doj.gov>; Scarpelli, Anthony (USADC) <AScarpelli@usa.doj.gov>; Patel, Neeraj (USACT) <npatel2@usa.doj.gov>  
Subject: Re: Call Tomorrow (Special Counsel Investigation)

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We hope you understand that we are trying to be cooperative. We would be happy to have a call with you and your team separately if that would be helpful.

Best regards,  
Jody

Jody R Westby, Esq.  
Managing Principal  
Global Cyber Legal LLC  
+1.202.255.2700  
westby@globalcyberlegal.com  
<https://protect2.fireeye.com/v1/url?k=7211baee-2d8a821e-72169e0b-ac1f6b0176b0-2941286214a1b996&q=1&e=3db575fb-ac73-4426-bd1f-7b6d618c069d&u=http%3A%2F%2Fwww.globalcyberlegal.com%2F>

On Jul 20, 2021, at 10:24 PM, DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov> wrote:

Good Evening Counsel for Georgia Tech and Counsel for David Dagon,

We hope all is well. Can you please let us know when you are available for a joint call tomorrow -- preferably at either 11:30 AM, 2:20 PM or 3:30 PM? We would like to discuss your clients' compliance with recently issued federal grand jury subpoenas. It is important that we have this call to ensure timely and comprehensive compliance with the subpoenas. Thanks very much.

The Special Counsel Team

---

**From:** MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@LAW.GA.GOV on behalf of DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
**Sent:** Wednesday, July 21, 2021 7:05 AM  
**To:** Jody R Westby  
**Cc:** Elizabeth Young; Mark Rasch; Fuller, Christian; Wasch, Kate; Eckenrode, John (JMD); Aldenberg, William B. (NH) (FBI); Fuhrman, Tim (JMD); Keilty, Michael (USANYE); Scarpelli, Anthony (USADC); Patel, Neeraj (USACT)  
**Subject:** RE: Call Tomorrow (Special Counsel Investigation)  
**Attachments:** RE: Call Tomorrow (Special Counsel Investigation)

Sender: Andrew.DeFilippis@usdoj.gov

Subject: RE: Call Tomorrow (Special Counsel Investigation)

Message-Id: <CY1P110MB01658F0C172C9B90D0BBB82AF2E39@CY1P110MB0165.NAMP110.PROD.OUTLOOK.COM>

Recipient: EYoung@law.ga.gov

---

**From:** DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
**Sent:** Wednesday, July 21, 2021 7:05 AM  
**To:** Jody R Westby  
**Cc:** Elizabeth Young; Mark Rasch; Fuller, Christian; Wasch, Kate; Eckenrode, John (JMD); Aldenberg, William B. (NH) (FBI); Fuhrman, Tim (JMD); Keilty, Michael (USANYE); Scarpelli, Anthony (USADC); Patel, Neeraj (USACT)  
**Subject:** RE: Call Tomorrow (Special Counsel Investigation)

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Jody, It is unfortunate that you are not willing to join a call with Georgia Tech's counsel for purposes of efficiency and to avoid delaying compliance with federal subpoenas. Regardless, can we please speak at 11:30 AM with you and Mark? Beth, would you then be available for a separate call with our team at either 2:30 PM or 3:30 PM?

-----Original Message-----

From: Jody R Westby <westby@globalcyberlegal.com>  
Sent: Tuesday, July 20, 2021 11:23 PM  
To: DeFilippis, Andrew (USANYS) <ADeFilippis@usa.doj.gov>  
Cc: Elizabeth Young <EYoung@LAW.GA.GOV>; Mark Rasch <rasch@globalcyberlegal.com>; Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch, Kate <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>; Keilty, Michael (USANYE) <MKeilty@usa.doj.gov>; Scarpelli, Anthony (USADC) <AScarpelli@usa.doj.gov>; Patel, Neeraj (USACT) <npatel2@usa.doj.gov>  
Subject: Re: Call Tomorrow (Special Counsel Investigation)

Dear Andrew:

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We hope you understand that we are trying to be cooperative. We would be happy to have a call with you and your team separately if that would be helpful.

Best regards,  
Jody

Jody R Westby, Esq.  
Managing Principal  
Global Cyber Legal LLC

+1.202.255.2700

westby@globalcyberlegal.com

<https://protect2.fireeye.com/v1/url?k=7211baee-2d8a821e-72169e0b-ac1f6b0176b0-2941286214a1b996&q=1&e=3db575fb-ac73-4426-bd1f-7b6d618c069d&u=http%3A%2F%2Fwww.globalcyberlegal.com%2F>

On Jul 20, 2021, at 10:24 PM, DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov> wrote:

Good Evening Counsel for Georgia Tech and Counsel for David Dagon,

We hope all is well. Can you please let us know when you are available for a joint call tomorrow -- preferably at either 11:30 AM, 2:20 PM or 3:30 PM? We would like to discuss your clients' compliance with recently issued federal grand jury subpoenas. It is important that we have this call to ensure timely and comprehensive compliance with the subpoenas. Thanks very much.

The Special Counsel Team

---

**From:** DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
**Sent:** Friday, July 30, 2021 10:49 AM  
**To:** Elizabeth Young  
**Cc:** Wasch, Kate; Aldenberg, William B. (NH)(FBI); Fuhrman, Tim (JMD); Keilty, Michael (USANYE); Scarpelli, Anthony(USADC); Patel, Neeraj (USACT)  
**Subject:** Re: Call Tomorrow (Special Counsel Investigation)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Beth,

We just wanted to give you a heads up that the FBI will be reaching out to Michael Farrell today to request an interview with him. Let us know if you have any questions. Thanks very much.

> On Jul 29, 2021, at 12:25 PM, Elizabeth Young <EYoung@law.ga.gov> wrote:

>

>

> I now have a call that I need to take at 4, so could we make it 4:30?

>

>

> Beth Young

> Assistant Attorney General

> Office of the Attorney General Chris Carr Government Services &

> Employment

> (404) 458-3425

> eyoung@law.ga.gov

> Georgia Department of Law

> 40 Capitol Square SW

> Atlanta, Georgia 30334

>

>

>

> -----Original Message-----

> From: Elizabeth Young

> Sent: Thursday, July 29, 2021 10:45 AM

> To: 'DeFilippis, Andrew (USANYS)' <Andrew.DeFilippis@usdoj.gov>

> Cc: Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch, Kate

> <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)

> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)

> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;

> Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli,

> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj (USACT)

> <Neeraj.Patel@usdoj.gov>

> Subject: RE: Call Tomorrow (Special Counsel Investigation)

>

>  
> We are working on responding to the issues you've raised in this and your previous email. Sometime late afternoon would be best - would 4:00 work for you?

>  
> Beth Young  
> Assistant Attorney General  
> Office of the Attorney General Chris Carr Government Services &  
> Employment  
> (404) 458-3425  
> <mailto:eyoung@law.ga.gov>  
> Georgia Department of Law  
> 40 Capitol Square SW  
> Atlanta, Georgia 30334

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>  
> -----Original Message-----

> From: DeFilippis, Andrew (USANYS) <[Andrew.DeFilippis@usdoj.gov](mailto:Andrew.DeFilippis@usdoj.gov)>  
> Sent: Thursday, July 29, 2021 6:44 AM  
> To: Elizabeth Young <[EYoung@LAW.GA.GOV](mailto:EYoung@LAW.GA.GOV)>  
> Cc: Fuller, Christian <[christian.fuller@legal.gatech.edu](mailto:christian.fuller@legal.gatech.edu)>; Wasch, Kate  
> <[kate.wasch@legal.gatech.edu](mailto:kate.wasch@legal.gatech.edu)>; Eckenrode, John (JMD)  
> <[John.Eckenrode@usdoj.gov](mailto:John.Eckenrode@usdoj.gov)>; Aldenberg, William B. (NH) (FBI)  
> <[wbaldenberg@fbi.gov](mailto:wbaldenberg@fbi.gov)>; Fuhrman, Tim (JMD) <[Tim.Fuhrman@usdoj.gov](mailto:Tim.Fuhrman@usdoj.gov)>;  
> Keilty, Michael (USANYE) <[Michael.Keilty@usdoj.gov](mailto:Michael.Keilty@usdoj.gov)>; Scarpelli,  
> Anthony (USADC) <[Anthony.Scarpelli@usdoj.gov](mailto:Anthony.Scarpelli@usdoj.gov)>; Patel, Neeraj (USACT)  
> <[Neeraj.Patel@usdoj.gov](mailto:Neeraj.Patel@usdoj.gov)>  
> Subject: Re: Call Tomorrow (Special Counsel Investigation)

>  
> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

>  
>  
> Beth,  
>  
> The white papers and related documents you produced to us are documents that \*we\* provided to Dr. Antonakakis's counsel for their client's review. That is where his counsel obtained them. It appears you have not located any responsive documents. We are also told by Mr. Dagon's counsel that he pointed you to a number of responsive records. We further understand that Michael Farrell likely has responsive documents. When are you available for a call today to discuss?

>  
> We may need a Georgia Tech custodian to testify in grand jury next week about the steps taken to search for responsive records. Let us know some times today when you are free.

>  
> Thanks.

>  
>  
>> On Jul 28, 2021, at 10:59 AM, Elizabeth Young <[EYoung@law.ga.gov](mailto:EYoung@law.ga.gov)> wrote:  
>>

>> I am sending you via Kiteworks a link to a folder containing the documents that Georgia Tech is able to produce with regard to the three categories of documents you asked us to search for during our 7/21 phone conference as follows:

>>

>> 1. White papers/analytical papers related to Trump/Alfa Bank/Yotaphone: We are providing copies of several white papers and related documents that we received via counsel for Dr. Antonakakis. We are not certain as to the origin and storage history of these documents and therefore cannot provide authentication for these documents as business records of Georgia Tech.

>>

>> 2. Email communications related to Trump/Alfa Bank/Yotaphone: You asked us to revisit our prior email production to ensure that no responsive communications had been overlooked in our earlier email response. A new search was conducted using the original search terms listed in the earlier subpoena, and added white papers and analytical papers to the request. The search did identify a number of emails that were not included in the initial production, although they appear to be irrelevant and are predominantly junk mail. However, I am providing them to you in order to demonstrate Tech's compliance with your request.

>>

>> 3. You indicated that there was a "fairly large file of Trump related materials" that had been assembled for production to the office of Special Counsel Robert Muller or the DOJ. We are unable to locate such a file. I have been informed that Dr. Antonakakis has searched his server for such a file and did not find anything meeting that description.

>>

>> If you would like me to add any additional recipients to the Kiteworks folder, please let me know.

>>

>> Thank you,

>>

>> Beth Young

>> Assistant Attorney General

>> Office of the Attorney General Chris Carr Government Services &

>> Employment

>> (404) 458-3425

>> <mailto:eyoung@law.ga.gov>

>> Georgia Department of Law

>> 40 Capitol Square SW

>> Atlanta, Georgia 30334

>>

>>

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>>

>> -----Original Message-----

>> From: DeFilippis, Andrew (USANYS) <[Andrew.DeFilippis@usdoj.gov](mailto:Andrew.DeFilippis@usdoj.gov)>

>> Sent: Wednesday, July 28, 2021 6:37 AM

>> To: Elizabeth Young <[EYoung@LAW.GA.GOV](mailto:EYoung@LAW.GA.GOV)>

>> Cc: Fuller, Christian <[christian.fuller@legal.gatech.edu](mailto:christian.fuller@legal.gatech.edu)>; Wasch,

>> Kate <[kate.wasch@legal.gatech.edu](mailto:kate.wasch@legal.gatech.edu)>; Eckenrode, John (JMD)

>> <[John.Eckenrode@usdoj.gov](mailto:John.Eckenrode@usdoj.gov)>; Aldenberg, William B. (NH) (FBI)

>> <[wbaldenberg@fbi.gov](mailto:wbaldenberg@fbi.gov)>; Fuhrman, Tim (JMD) <[Tim.Fuhrman@usdoj.gov](mailto:Tim.Fuhrman@usdoj.gov)>;

>> Keilty, Michael (USANYE) <[Michael.Keilty@usdoj.gov](mailto:Michael.Keilty@usdoj.gov)>; Scarpelli,

>> Anthony (USADC) <[Anthony.Scarpelli@usdoj.gov](mailto:Anthony.Scarpelli@usdoj.gov)>; Patel, Neeraj (USACT)

>> <[Neeraj.Patel@usdoj.gov](mailto:Neeraj.Patel@usdoj.gov)>

>> Subject: Re: Call Tomorrow (Special Counsel Investigation)

>>

>> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

>>

>>

>> Good morning Beth,

>>

>> You had said on Friday that you hoped to start producing documents on Monday. Can we expect to receive them today? Thanks.

>>

>>>> On Jul 23, 2021, at 9:31 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:

>>>

>>> That's fine. Talk to you then.

>>>

>>> Beth Young

>>> Assistant Attorney General

>>> Office of the Attorney General Chris Carr Government Services &

>>> Employment

>>> (404) 458-3425

>>> eyoung@law.ga.gov

>>> Georgia Department of Law

>>> 40 Capitol Square SW

>>> Atlanta, Georgia 30334

>>>

>>>

>>>

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>>> -----Original Message-----

>>> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>

>>> Sent: Friday, July 23, 2021 9:08 AM

>>> To: Elizabeth Young <EYoung@LAW.GA.GOV>

>>> Cc: Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch,

>>> Kate <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)

>>> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)

>>> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;

>>> Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli,

>>> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj (USACT)

>>> <Neeraj.Patel@usdoj.gov>

>>> Subject: Re: Call Tomorrow (Special Counsel Investigation)

>>>

>>> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

>>>

>>>

>>> Can we say 4:30? Thank you.

>>>

>>>>> On Jul 23, 2021, at 8:59 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:

>>>>

>>>> I'm booked up this morning but available after lunch - how about 2:30? If that doesn't work let me know what does.

>>>>

>>>>

>>>> Beth Young



>>>> Assistant Attorney General  
>>>> Office of the Attorney General Chris Carr Government Services &  
>>>> Employment  
>>>> (404) 458-3425  
>>>> eyoung@law.ga.gov  
>>>> Georgia Department of Law  
>>>> 40 Capitol Square SW  
>>>> Atlanta, Georgia 30334

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>>>>

>>>> -----Original Message-----

>>>> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
>>>> Sent: Thursday, July 22, 2021 10:17 PM  
>>>> To: Elizabeth Young <EYoung@LAW.GA.GOV>  
>>>> Cc: Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch,  
>>>> Kate <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)  
>>>> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)  
>>>> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;  
>>>> Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli,  
>>>> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj  
>>>> (USACT) <Neeraj.Patel@usdoj.gov>  
>>>> Subject: Re: Call Tomorrow (Special Counsel Investigation)

>>>>  
>>>> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you  
recognize the sender and know the content is safe.

>>>>  
>>>>

>>>> Beth,  
>>>> We hope all is well. Can you let us know some times tomorrow when you would be available for an update call?

>>>>  
>>>> Thank you.

>>>>  
>>>>  
>>>>

>>>>>> On Jul 21, 2021, at 8:07 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:  
>>>>>> I'm available for a call at 3:30 today. Please let me know what number you'd like me to call.

>>>>>> Elizabeth (Beth) Young  
>>>>>> Assistant Attorney General  
>>>>>> Office of the Attorney General Chris Carr Government Services &  
>>>>>> Employment  
>>>>>> (404) 458-3425  
>>>>>> eyoung@law.ga.gov  
>>>>>> Georgia Department of Law  
>>>>>> 40 Capitol Square SW  
>>>>>> Atlanta, Georgia 30334

>>>>>> -----Original Message-----

>>>>>> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
>>>>>> Sent: Wednesday, July 21, 2021 7:05 AM  
>>>>>> To: Jody R Westby <westby@globalcyberlegal.com>  
>>>>>> Cc: Elizabeth Young <EYoung@LAW.GA.GOV>; Mark Rasch  
>>>>>> <rasch@globalcyberlegal.com>; Fuller, Christian

>>>> <christian.fuller@legal.gatech.edu>; Wasch, Kate  
>>>> <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)  
>>>> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)  
>>>> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;  
>>>> Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli,  
>>>> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj  
>>>> (USACT) <Neeraj.Patel@usdoj.gov>  
>>>> Subject: RE: Call Tomorrow (Special Counsel Investigation)  
>>>> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless  
you recognize the sender and know the content is safe.  
>>>> Jody, It is unfortunate that you are not willing to join a call with Georgia Tech's counsel for purposes of efficiency  
and to avoid delaying compliance with federal subpoenas. Regardless, can we please speak at 11:30 AM with you and  
Mark? Beth, would you then be available for a separate call with our team at either 2:30 PM or 3:30 PM?  
>>>> -----Original Message-----  
>>>> From: Jody R Westby <westby@globalcyberlegal.com>  
>>>> Sent: Tuesday, July 20, 2021 11:23 PM  
>>>> To: DeFilippis, Andrew (USANYS) <ADeFilippis@usa.doj.gov>  
>>>> Cc: Elizabeth Young <EYoung@LAW.GA.GOV>; Mark Rasch  
>>>> <rasch@globalcyberlegal.com>; Fuller, Christian  
>>>> <christian.fuller@legal.gatech.edu>; Wasch, Kate  
>>>> <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)  
>>>> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)  
>>>> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;  
>>>> Keilty, Michael (USANYE) <MKeilty@usa.doj.gov>; Scarpelli, Anthony  
>>>> (USADC) <AScarpelli@usa.doj.gov>; Patel, Neeraj (USACT)  
>>>> <npatel2@usa.doj.gov>  
>>>> Subject: Re: Call Tomorrow (Special Counsel Investigation) Dear  
>>>> Andrew:  
>>>> We appreciate that you need the documents / data subject to the subpoenas to Georgia Tech. However, we are  
not a party to those subpoenas and have no knowledge of them. We are not the custodian of records for Georgia Tech,  
and our client is not the Principal Investigator on the DARPA contract or a professor of the College of Electrical  
Engineering. We have indicated that we do not believe that Mr. Dagon has any responsive Georgia Tech documents /  
data in his personal capacity. While our client may be helpful in pointing Georgia Tech to documents or data relevant to  
their subpoenas (if we are informed of their contents), responsibility for compliance lies with Georgia Tech. We  
respectfully request that the Special Counsel's team work with each party that it is seeking evidence from and not ask us  
to get in the middle. Georgia Tech needs to determine how it wants to respond to the subpoenas; we are more than  
happy to provide any assistance that would be useful to them.  
>>>> We hope you understand that we are trying to be cooperative. We would be happy to have a call with you and  
your team separately if that would be helpful.  
>>>> Best regards,  
>>>> Jody  
>>>> Jody R Westby, Esq.  
>>>> Managing Principal  
>>>> Global Cyber Legal LLC  
>>>> +1.202.255.2700  
>>>> westby@globalcyberlegal.com  
>>>> <https://protect2.fireeye.com/v1/url?k=7211baee-2d8a821e-72169e0b-a>  
>>>> c  
>>>> 1  
>>>> f  
>>>> 6  
>>>> b0176b0-2941286214a1b996&q=1&e=3db575fb-ac73-4426-bd1f-7b6d618c069

>>>> d & u = <http%3A%2F%2Fwww.globalcyberlegal.com%2F>

>>>>> On Jul 20, 2021, at 10:24 PM, DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov> wrote:

>>>> Good Evening Counsel for Georgia Tech and Counsel for David Dagon,

>>>> We hope all is well. Can you please let us know when you are available for a joint call tomorrow -- preferably at either 11:30 AM, 2:20 PM or 3:30 PM? We would like to discuss your clients' compliance with recently issued federal grand jury subpoenas. It is important that we have this call to ensure timely and comprehensive compliance with the subpoenas. Thanks very much.

>>>> The Special Counsel Team

---

**From:** DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
**Sent:** Tuesday, July 20, 2021 4:40 PM  
**To:** Elizabeth Young  
**Cc:** Lopes, Crane; Fuller, Christian; Wasch, Kate; Ling-Ling Nie (linglingnie@gatech.edu); Keilty, Michael (USANYE); Patel, Neeraj (USACT); Scarpelli, Anthony (USADC); Eckenrode, John (JMD); Aldenberg, William B. (NH) (FBI); Maddock, Adam M.(CyD) (FBI); James, Ryan Joseph (INSD) (FBI); Bennett, Wes; Smith, Darin  
**Subject:** Re: DARPA  
**Attachments:** image002.jpg; image004.png; image005.png; image007.jpg

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Thanks very much, all. We greatly appreciate your quick responses. Ms. Young, we will be in touch once we have received and reviewed the documents and can discuss any further records searches at that time.

Thanks again.

On Jul 20, 2021, at 4:11 PM, Elizabeth Young wrote:

Mr. Lopes,

Thank you for confirming that Georgia Tech may produce documents responsive to the DOJ's subpoena without running afoul of any obligations it may have to DARPA/DOD to safeguard confidential or classified information. Georgia Tech therefore is authorizing the release of responsive materials that have been identified by the employees involved directly to the DOJ.

It is our understanding from conversations with the employees' counsel that the documents that are about to be produced do not contain any classified information. To the extent that the DOJ might seek production of additional documents from Georgia Tech in the future, we will take appropriate steps to determine whether any responsive documents are classified and, if so, will coordinate with Mr. Smith regarding production.

Mr. DeFilippis, if you require anything further from Georgia Tech in order to fulfill its obligations under the subpoena beyond the above statement affirming that Tech is authorizing release of the records that have been compiled by the employees, please let me know.

Sincerely,  
Beth Young

**Beth Young**  
**Assistant Attorney General**  
**Office of the Attorney General Chris Carr**  
**Government Services & Employment**  
(404) 458-3425  
eyoung@law.ga.gov  
Georgia Department of Law

40 Capitol Square SW  
Atlanta, Georgia 30334

---

**From:** Lopes, Crane

**Sent:** Tuesday, July 20, 2021 2:16 PM

**To:** DeFilippis, Andrew (USANYS) ; Elizabeth Young

**Cc:** 'Fuller, Christian' ; Wasch, Kate ; Ling-Ling Nie ([linglingnie@gatech.edu](mailto:linglingnie@gatech.edu)) ; Keilty, Michael (USANYE) ; Patel, Neeraj (USACT) ; Scarpelli, Anthony (USADC) ; Eckenrode, John (JMD) ; Aldenberg, William B. (NH) (FBI) ; Maddock, Adam M. (CyD) (FBI) ; James, Ryan Joseph (INSD) (FBI) ; Bennett, Wes ; Smith, Darin

**Subject:** RE: DARPA

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Ms. Young:

Thank you for your diligence in protecting DARPA-related records and other documents from unauthorized use or disclosure.

I have discussed this matter with Wes Bennett, the Director of the DARPA Contracts Management Office. Mr. Bennett is info-copied on this message. We request that you cooperate with the Department of Justice (DoJ) by immediately providing them with all DARPA-related unclassified documents and records in your possession and that are requested by their subpoena.


If DoJ has requested DARPA-related classified documents and records in your possession, release should be coordinated with Mr. Darin Smith, DARPA Security & Intelligence Directorate. Mr. Smith is info-copied on this message.

Please contact me if I can assist you.

Crane Lopes, Ph.D.

General Counsel

DARPA

Off | 571.218.4887 

Mob | 571.239.5084

Creating **BREAKTHROUGH TECHNOLOGIES**

For National Security

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**From:** DeFilippis, Andrew (USANYS) <[Andrew.DeFilippis@usdoj.gov](mailto:Andrew.DeFilippis@usdoj.gov)>

**Sent:** Tuesday, July 20, 2021 10:51 AM

**To:** Elizabeth Young <[EYoung@LAW.GA.GOV](mailto:EYoung@LAW.GA.GOV)>

**Cc:** 'Fuller, Christian' <[christian.fuller@legal.gatech.edu](mailto:christian.fuller@legal.gatech.edu)>; Wasch, Kate <[kate.wasch@legal.gatech.edu](mailto:kate.wasch@legal.gatech.edu)>; Ling-Ling Nie ([linglingnie@gatech.edu](mailto:linglingnie@gatech.edu)) <[linglingnie@gatech.edu](mailto:linglingnie@gatech.edu)>; Lopes, Crane <[Crane.Lopes@darpa.mil](mailto:Crane.Lopes@darpa.mil)>; Keilty, Michael (USANYE) <[Michael.Keilty@usdoj.gov](mailto:Michael.Keilty@usdoj.gov)>; Patel, Neeraj (USACT) <[Neeraj.Patel@usdoj.gov](mailto:Neeraj.Patel@usdoj.gov)>; Scarpelli, Anthony (USADC) <[Anthony.Scarpelli@usdoj.gov](mailto:Anthony.Scarpelli@usdoj.gov)>; Eckenrode, John (JMD) <[John.Eckenrode@usdoj.gov](mailto:John.Eckenrode@usdoj.gov)>; Aldenberg, William B. (NH) (FBI) <[wbaldenberg@fbi.gov](mailto:wbaldenberg@fbi.gov)>; Maddock, Adam M. (CyD) (FBI) <[ammaddock@fbi.gov](mailto:ammaddock@fbi.gov)>; James, Ryan Joseph (INSD) (FBI) <[rjames@fbi.gov](mailto:rjames@fbi.gov)>

**Subject:** DARPA

Ms. Young,

Thank you very much for our call earlier today. On that call, you requested that we provide assurance that the Defense Advanced Research Projects Agency (DARPA) has no objection to Georgia Tech's providing documents and other records in response to our federal grand jury subpoena that relate to a contract between Georgia Tech and DARPA. I am copying Crane Lopes, General Counsel of DARPA. Mr. Lopes and DARPA have been fully cooperative with and supportive of our investigative efforts. On a phone call that occurred a few minutes ago, Mr. Lopes has assured me again that DARPA has no

---

**From:** DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
**Sent:** Monday, July 19, 2021 5:28 PM  
**To:** Elizabeth Young  
**Cc:** Fuller, Christian; Wasch, Kate; Ling-Ling Nie (linglingnie@gatech.edu)  
**Subject:** Re: Georgia Tech Subpoena 7-19-2021  
**Attachments:** image001.jpg; image002.png; image003.png

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Yes 10:00 am tomorrow is perfect. Thank you. We can use the dial-in below.

Dial-in

Conference ID: [REDACTED]

On Jul 19, 2021, at 1:53 PM, Elizabeth Young wrote:

Mr. DeFilippis,

I have been engaged to represent Georgia Tech and the University System of Georgia in responding to your 7/19 subpoena. I've been forwarded a copy of the subpoena and your email sent this afternoon. I look forward to discussing your suggestions for identifying responsive materials. Would tomorrow morning at 10 AM work for a call to discuss? If not, let me know what times would be better for you. Thank you,  
Beth Young

**Elizabeth (Beth) Young**  
**Assistant Attorney General**  
**Office of the Attorney General Chris Carr**  
**Government Services & Employment**  
(404) 458-3425  
eyoung@law.ga.gov  
Georgia Department of Law  
40 Capitol Square SW  
Atlanta, Georgia 30334

---

**From:** Elizabeth Young <eyoung@law.ga.gov>  
**Sent:** Monday, August 2, 2021 1:08 PM  
**To:** 'DeFilippis, Andrew (USANYS)'  
**Cc:** Kate Wasch; Jody R Westby; Mark D. Rasch; Eckenrode, John (JMD); Scarpelli, Anthony (USADC); Keilty, Michael (USANYE); Patel, Neeraj (USACT); Fuhrman, Tim (JMD); Aldenberg, William B. (NH) (FBI); Maddock, Adam M. (CyD) (FBI)  
**Subject:** RE: Rhannusia Logs

We've reviewed the chat logs and there are only a few comments that would be responsive to the subpoena. We can produce those portions of the log.

I am checking to see whether we can agree to produce the full log without requiring a subpoena and will have an answer for you this afternoon. If we agree to that, will that be sufficient complete Tech's obligations under the subpoena (unless Michael Farrell identifies any additional documents in Tech's custody or control that have not been previously produced and are responsive to the subpoena)?

Beth Young  
Assistant Attorney General  
Office of the Attorney General Chris Carr Government Services & Employment  
(404) 458-3425  
eyoung@law.ga.gov  
Georgia Department of Law  
40 Capitol Square SW  
Atlanta, Georgia 30334

-----Original Message-----

From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
Sent: Monday, August 2, 2021 8:23 AM  
To: Elizabeth Young <EYoung@LAW.GA.GOV>  
Cc: Kate Wasch <kate.wasch@legal.gatech.edu>; Jody R Westby <westby@globalcyberlegal.com>; Mark D. Rasch <rasch@globalcyberlegal.com>; Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Scarpelli, Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Patel, Neeraj (USACT) <Neeraj.Patel@usdoj.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Maddock, Adam M. (CyD) (FBI) <ammaddock@fbi.gov>  
Subject: Re: Rhannusia Logs

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Beth,

Will you be able to produce to us today the Rhannusia chats that Mr. Dagon identified? We request that you produce them in their entirety, as we believe based on representations from Mr. Dagon and his counsel that entire set of logs is

pertinent to our investigation. If necessary we can provide you with a subpoena for the full set of logs. Let us know. Thanks.

> On Jul 30, 2021, at 10:02 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:

>  
> I reached out to Ms. Westby after our call yesterday and she confirmed that Mr. Dagon has copies of these chat logs and will be forwarding them to us so that we can review and produce them.

>  
> Beth Young  
> Assistant Attorney General  
> Office of the Attorney General Chris Carr Government Services &  
> Employment  
> (404) 458-3425  
> eyoung@law.ga.gov  
> Georgia Department of Law  
> 40 Capitol Square SW  
> Atlanta, Georgia 30334

>  
>  
>  
> -----Original Message-----

> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
> Sent: Friday, July 30, 2021 7:43 AM  
> To: Elizabeth Young <EYoung@LAW.GA.GOV>; Kate Wasch  
> <kate.wasch@legal.gatech.edu>; Jody R Westby  
> <westby@globalcyberlegal.com>; Mark D. Rasch  
> <rasch@globalcyberlegal.com>  
> Cc: Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Scarpelli,  
> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Keilty, Michael  
> (USANYE) <Michael.Keilty@usdoj.gov>; Patel, Neeraj (USACT)  
> <Neeraj.Patel@usdoj.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;  
> Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Maddock, Adam  
> M. (CyD) (FBI) <ammaddock@fbi.gov>  
> Subject: Rhannusia Logs

>  
> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

>  
>  
> All,

>  
> As we have discussed with each of you, Mr. Dagon has identified "Rhannusia" chat communications that we understand are responsive to our subpoena and relevant to our investigation. We would like to obtain these communications promptly and would also like to minimize the burdens on all involved.

>  
> Beth, can you please confirm in response to this email that Georgia Tech authorizes and requests that Mr. Dagon provide those logs to the government as an employee of Georgia Tech? If you would like us to issue a subpoena for them specifically and will accept service, we can do so today.

>



## Jotonna Tulloch

---

**From:** DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
**Sent:** Friday, July 30, 2021 12:33 PM  
**To:** Jody R Westby  
**Cc:** Elizabeth Young; Kate Wasch; Mark D. Rasch; Eckenrode, John (JMD); Scarpelli, Anthony(USADC); Keilty, Michael (USANYE); Patel, Neeraj (USACT); Fuhrman, Tim (JMD); Aldenberg, William B. (NH) (FBI); Maddock, Adam M.(CyD) (FBI)  
**Subject:** Re: Rhannusia Logs

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thanks Jody.

> On Jul 30, 2021, at 11:43 AM, Jody R Westby <westby@globalcyberlegal.com> wrote:

>  
> Working on getting these now. Will be back in touch. Understand the priority. Thanks!  
>  
> Jody R Westby, Esq.  
> Managing Principal  
> Global Cyber Legal LLC  
> +1.202.255.2700  
> westby@globalcyberlegal.com  
> <https://protect2.fireeye.com/v1/url?k=b29a74d1-ed014c21-b29d5034-ac1f6b0176b0-adca19826f2a37b1&q=1&e=d14cab5e-a36f-490e-b1c7-7aba64fad846&u=http%3A%2F%2Fwww.globalcyberlegal.com%2F>  
>  
>  
>

> On Jul 30, 2021, at 10:04 AM, DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov> wrote:

>  
> Excellent thanks very much.

>> On Jul 30, 2021, at 10:02 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:

>>  
>> I reached out to Ms. Westby after our call yesterday and she confirmed that Mr. Dagon has copies of these chat logs and will be forwarding them to us so that we can review and produce them.

>>  
>> Beth Young  
>> Assistant Attorney General  
>> Office of the Attorney General Chris Carr Government Services &  
>> Employment  
>> (404) 458-3425  
>> eyoung@law.ga.gov  
>> Georgia Department of Law

>> 40 Capitol Square SW  
>> Atlanta, Georgia 30334  
>>  
>>  
>>

>> -----Original Message-----

>> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
>> Sent: Friday, July 30, 2021 7:43 AM  
>> To: Elizabeth Young <EYoung@LAW.GA.GOV>; Kate Wasch  
>> <kate.wasch@legal.gatech.edu>; Jody R Westby  
>> <westby@globalcyberlegal.com>; Mark D. Rasch  
>> <rasch@globalcyberlegal.com>  
>> Cc: Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Scarpelli,  
>> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Keilty, Michael  
>> (USANYE) <Michael.Keilty@usdoj.gov>; Patel, Neeraj (USACT)  
>> <Neeraj.Patel@usdoj.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;  
>> Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Maddock, Adam  
>> M. (CyD) (FBI) <ammaddock@fbi.gov>  
>> Subject: Rhannusia Logs

>>  
>> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

>>  
>>  
>> All,  
>>

>> As we have discussed with each of you, Mr. Dagon has identified "Rhamnusia" chat communications that we understand are responsive to our subpoena and relevant to our investigation. We would like to obtain these communications promptly and would also like to minimize the burdens on all involved.

>>  
>> Beth, can you please confirm in response to this email that Georgia Tech authorizes and requests that Mr. Dagon provide those logs to the government as an employee of Georgia Tech? If you would like us to issue a subpoena for them specifically and will accept service, we can do so today.

>>  
>> Jody/Mark, can you please let us know when Mr. Dagon can provide the logs to us or, alternatively, to Georgia Tech for production to us?

>>  
>> We are hopeful that we can find a solution to this issue in the near term and avoid unnecessary legal process or disruptions.

>>  
>> Thank you very much.

>>  
>  
>

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**From:** DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
**Sent:** Friday, July 30, 2021 10:04 AM  
**To:** Elizabeth Young  
**Cc:** Kate Wasch; Jody R Westby; Mark D. Rasch; Eckenrode, John (JMD); Scarpelli, Anthony(USADC); Keilty, Michael (USANYE); Patel, Neeraj (USACT); Fuhrman, Tim (JMD); Aldenberg, William B. (NH) (FBI); Maddock, Adam M.(CyD) (FBI)  
**Subject:** Re: Rhannusia Logs

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Excellent thanks very much.

> On Jul 30, 2021, at 10:02 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:

>  
> I reached out to Ms. Westby after our call yesterday and she confirmed that Mr. Dagon has copies of these chat logs and will be forwarding them to us so that we can review and produce them.

>  
> Beth Young  
> Assistant Attorney General  
> Office of the Attorney General Chris Carr Government Services &  
> Employment  
> (404) 458-3425  
> eyoung@law.ga.gov  
> Georgia Department of Law  
> 40 Capitol Square SW  
> Atlanta, Georgia 30334

>  
>  
>  
> -----Original Message-----

> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
> Sent: Friday, July 30, 2021 7:43 AM  
> To: Elizabeth Young <EYoung@LAW.GA.GOV>; Kate Wasch  
> <kate.wasch@legal.gatech.edu>; Jody R Westby  
> <westby@globalcyberlegal.com>; Mark D. Rasch  
> <rasch@globalcyberlegal.com>  
> Cc: Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Scarpelli,  
> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Keilty, Michael  
> (USANYE) <Michael.Keilty@usdoj.gov>; Patel, Neeraj (USACT)  
> <Neeraj.Patel@usdoj.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;  
> Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Maddock, Adam  
> M. (CyD) (FBI) <ammaddock@fbi.gov>  
> Subject: Rhannusia Logs

>

---

**From:** EYoung@LAW.GA.GOV  
**Sent:** Monday, August 2, 2021 5:01 PM  
**To:** Andrew.DeFilippis@usdoj.gov  
**Cc:** kate.wasch@legal.gatech.edu; westby@globalcyberlegal.com; rasch@globalcyberlegal.com; John.Eckenrode@usdoj.gov; Anthony.Scarpelli@usdoj.gov; Michael.Keilty@usdoj.gov; Neeraj.Patel@usdoj.gov; Tim.Fuhrman@usdoj.gov; christian.fuller@legal.gatech.edu; wbaldenberg@fbi.gov; ammaddock@fbi.gov  
**Subject:** RE: Rhannusia Logs

I am attaching the full Rhannusia chat log as you have requested. The second attachment (rhannusia\_expanded\_formatting.txt) should be identical to the first, except that Mr. Dagon added some additional formatting to identify the sender and date. However, since we have not independently verified that all other details between the two logs are identical, I am providing you with both the original and expanded formatting versions.

Sincerely,  
Beth Young

Beth Young  
Assistant Attorney General  
Office of the Attorney General Chris Carr Government Services & Employment  
(404) 458-3425  
eyoung@law.ga.gov  
Georgia Department of Law  
40 Capitol Square SW  
Atlanta, Georgia 30334

-----Original Message-----

From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
Sent: Monday, August 2, 2021 8:23 AM  
To: Elizabeth Young <EYoung@LAW.GA.GOV>  
Cc: Kate Wasch <kate.wasch@legal.gatech.edu>; Jody R Westby <westby@globalcyberlegal.com>; Mark D. Rasch <rasch@globalcyberlegal.com>; Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Scarpelli, Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Patel, Neeraj (USACT) <Neeraj.Patel@usdoj.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Maddock, Adam M. (CyD) (FBI) <ammaddock@fbi.gov>  
Subject: Re: Rhannusia Logs

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Beth,

Will you be able to produce to us today the Rhannousia chats that Mr. Dagon identified? We request that you produce them in their entirety, as we believe based on representations from Mr. Dagon and his counsel that entire set of logs is pertinent to our investigation. If necessary we can provide you with a subpoena for the full set of logs. Let us know. Thanks.

> On Jul 30, 2021, at 10:02 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:

>

> I reached out to Ms. Westby after our call yesterday and she confirmed that Mr. Dagon has copies of these chat logs and will be forwarding them to us so that we can review and produce them.

>

> Beth Young

> Assistant Attorney General

> Office of the Attorney General Chris Carr Government Services &

> Employment

> (404) 458-3425

> eyoung@law.ga.gov

> Georgia Department of Law

> 40 Capitol Square SW

> Atlanta, Georgia 30334

>

>

>

> -----Original Message-----

> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>

> Sent: Friday, July 30, 2021 7:43 AM

> To: Elizabeth Young <EYoung@LAW.GA.GOV>; Kate Wasch

> <kate.wasch@legal.gatech.edu>; Jody R Westby

> <westby@globalcyberlegal.com>; Mark D. Rasch

> <rasch@globalcyberlegal.com>

> Cc: Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Scarpelli,

> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Keilty, Michael

> (USANYE) <Michael.Keilty@usdoj.gov>; Patel, Neeraj (USACT)

> <Neeraj.Patel@usdoj.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;

> Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Maddock, Adam

> M. (CyD) (FBI) <ammaddock@fbi.gov>

> Subject: Rhannousia Logs

>

> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

>

>

> All,

>

> As we have discussed with each of you, Mr. Dagon has identified "Rhannousia" chat communications that we understand are responsive to our subpoena and relevant to our investigation. We would like to obtain these communications promptly and would also like to minimize the burdens on all involved.

>

> Beth, can you please confirm in response to this email that Georgia Tech authorizes and requests that Mr. Dagon provide those logs to the government as an employee of Georgia Tech? If you would like us to issue a subpoena for them specifically and will accept service, we can do so today.

---

**From:** DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
**Sent:** Thursday, July 29, 2021 4:16 PM  
**To:** eyoung@law.ga.gov; Keilty, Michael (USANYE); Scarpelli, Anthony (USADC); Patel, Neeraj (USACT); Aldenberg, William B. (NH) (FBI); Eckenrode, John (JMD); Fuhrman, Tim (JMD)  
**Subject:** Special Counsel/Georgia Tech  
**Attachments:** attachment.ics

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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**From:** EYoung@LAW.GA.GOV  
**Sent:** Thursday, July 29, 2021 9:32 AM  
**To:** linglingnie@gatech.edu  
**Cc:** kate.wasch@legal.gatech.edu  
**Subject:** FW: Call Tomorrow (Special Counsel Investigation)

FYI

Beth Young  
Assistant Attorney General  
Office of the Attorney General Chris Carr Government Services & Employment  
(404) 458-3425  
mailto:eyoung@law.ga.gov  
Georgia Department of Law  
40 Capitol Square SW  
Atlanta, Georgia 30334

-----Original Message-----

From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
Sent: Thursday, July 29, 2021 6:44 AM  
To: Elizabeth Young <EYoung@LAW.GA.GOV>  
Cc: Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch, Kate <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>; Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli, Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj (USACT) <Neeraj.Patel@usdoj.gov>  
Subject: Re: Call Tomorrow (Special Counsel Investigation)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Beth,

The white papers and related documents you produced to us are documents that \*we\* provided to Dr. Antonakakis's counsel for their client's review. That is where his counsel obtained them. It appears you have not located any responsive documents. We are also told by Mr. Dagon's counsel that he pointed you to a number of responsive records. We further understand that Michael Farrell likely has responsive documents. When are you available for a call today to discuss?

We may need a Georgia Tech custodian to testify in grand jury next week about the steps taken to search for responsive records. Let us know some times today when you are free.

Thanks.

> On Jul 28, 2021, at 10:59 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:

>

> I am sending you via Kiteworks a link to a folder containing the documents that Georgia Tech is able to produce with regard to the three categories of documents you asked us to search for during our 7/21 phone conference as follows:

>

> 1. White papers/analytical papers related to Trump/Alfa Bank/Yotaphone: We are providing copies of several white papers and related documents that we received via counsel for Dr. Antonakakis. We are not certain as to the origin and storage history of these documents and therefore cannot provide authentication for these documents as business records of Georgia Tech.

>

> 2. Email communications related to Trump/Alfa Bank/Yotaphone: You asked us to revisit our prior email production to ensure that no responsive communications had been overlooked in our earlier email response. A new search was conducted using the original search terms listed in the earlier subpoena, and added white papers and analytical papers to the request. The search did identify a number of emails that were not included in the initial production, although they appear to be irrelevant and are predominantly junk mail. However, I am providing them to you in order to demonstrate Tech's compliance with your request.

>

> 3. You indicated that there was a "fairly large file of Trump related materials" that had been assembled for production to the office of Special Counsel Robert Muller or the DOJ. We are unable to locate such a file. I have been informed that Dr. Antonakakis has searched his server for such a file and did not find anything meeting that description.

>

> If you would like me to add any additional recipients to the Kiteworks folder, please let me know.

>

> Thank you,

>

> Beth Young

> Assistant Attorney General

> Office of the Attorney General Chris Carr Government Services &

> Employment

> (404) 458-3425

> <mailto:eyoung@law.ga.gov>

> Georgia Department of Law

> 40 Capitol Square SW

> Atlanta, Georgia 30334

>

>

>

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>

> -----Original Message-----

> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>

> Sent: Wednesday, July 28, 2021 6:37 AM

> To: Elizabeth Young <EYoung@LAW.GA.GOV>

> Cc: Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch, Kate

> <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)

> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)

> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;

> Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli,

> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj (USACT)



> <Neeraj.Patel@usdoj.gov>  
> Subject: Re: Call Tomorrow (Special Counsel Investigation)  
>  
> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.  
>  
>  
> Good morning Beth,  
>  
> You had said on Friday that you hoped to start producing documents on Monday. Can we expect to receive them today? Thanks.  
>  
>> On Jul 23, 2021, at 9:31 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:  
>>  
>> That's fine. Talk to you then.  
>>  
>> Beth Young  
>> Assistant Attorney General  
>> Office of the Attorney General Chris Carr Government Services &  
>> Employment  
>> (404) 458-3425  
>> eyoung@law.ga.gov  
>> Georgia Department of Law  
>> 40 Capitol Square SW  
>> Atlanta, Georgia 30334  
>>  
>>  
>>  
>>  
>> -----Original Message-----  
>> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
>> Sent: Friday, July 23, 2021 9:08 AM  
>> To: Elizabeth Young <EYoung@LAW.GA.GOV>  
>> Cc: Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch,  
>> Kate <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)  
>> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)  
>> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;  
>> Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli,  
>> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj (USACT)  
>> <Neeraj.Patel@usdoj.gov>  
>> Subject: Re: Call Tomorrow (Special Counsel Investigation)  
>>  
>> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.  
>>  
>>  
>> Can we say 4:30? Thank you.  
>>  
>>>> On Jul 23, 2021, at 8:59 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:  
>>>>  
>>>> I'm booked up this morning but available after lunch - how about 2:30? If that doesn't work let me know what does.  
>>>>

>>>  
>>> Beth Young  
>>> Assistant Attorney General  
>>> Office of the Attorney General Chris Carr Government Services &  
>>> Employment  
>>> (404) 458-3425  
>>> eyoung@law.ga.gov  
>>> Georgia Department of Law  
>>> 40 Capitol Square SW  
>>> Atlanta, Georgia 30334  
>>>  
>>>  
>>>  
>>> -----Original Message-----  
>>> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
>>> Sent: Thursday, July 22, 2021 10:17 PM  
>>> To: Elizabeth Young <EYoung@LAW.GA.GOV>  
>>> Cc: Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch,  
>>> Kate <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)  
>>> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)  
>>> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;  
>>> Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli,  
>>> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj (USACT)  
>>> <Neeraj.Patel@usdoj.gov>  
>>> Subject: Re: Call Tomorrow (Special Counsel Investigation)  
>>>  
>>> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you  
recognize the sender and know the content is safe.  
>>>  
>>>  
>>> Beth,  
>>> We hope all is well. Can you let us know some times tomorrow when you would be available for an update call?  
>>>  
>>> Thank you.  
>>>  
>>>  
>>>  
>>>>> On Jul 21, 2021, at 8:07 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:  
>>>>> I'm available for a call at 3:30 today. Please let me know what number you'd like me to call.  
>>>>> Elizabeth (Beth) Young  
>>>>> Assistant Attorney General  
>>>>> Office of the Attorney General Chris Carr Government Services &  
>>>>> Employment  
>>>>> (404) 458-3425  
>>>>> eyoung@law.ga.gov  
>>>>> Georgia Department of Law  
>>>>> 40 Capitol Square SW  
>>>>> Atlanta, Georgia 30334  
>>>>> -----Original Message-----  
>>>>> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
>>>>> Sent: Wednesday, July 21, 2021 7:05 AM  
>>>>> To: Jody R Westby <westby@globalcyberlegal.com>

>>>> Cc: Elizabeth Young <EYoung@LAW.GA.GOV>; Mark Rasch  
>>>> <rasch@globalcyberlegal.com>; Fuller, Christian  
>>>> <christian.fuller@legal.gatech.edu>; Wasch, Kate  
>>>> <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)  
>>>> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)  
>>>> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;  
>>>> Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli,  
>>>> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj  
>>>> (USACT) <Neeraj.Patel@usdoj.gov>  
>>>> Subject: RE: Call Tomorrow (Special Counsel Investigation)  
>>>> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.  
>>>> Jody, It is unfortunate that you are not willing to join a call with Georgia Tech's counsel for purposes of efficiency and to avoid delaying compliance with federal subpoenas. Regardless, can we please speak at 11:30 AM with you and Mark? Beth, would you then be available for a separate call with our team at either 2:30 PM or 3:30 PM?  
>>>> -----Original Message-----  
>>>> From: Jody R Westby <westby@globalcyberlegal.com>  
>>>> Sent: Tuesday, July 20, 2021 11:23 PM  
>>>> To: DeFilippis, Andrew (USANYS) <ADeFilippis@usa.doj.gov>  
>>>> Cc: Elizabeth Young <EYoung@LAW.GA.GOV>; Mark Rasch  
>>>> <rasch@globalcyberlegal.com>; Fuller, Christian  
>>>> <christian.fuller@legal.gatech.edu>; Wasch, Kate  
>>>> <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)  
>>>> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)  
>>>> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;  
>>>> Keilty, Michael (USANYE) <MKeilty@usa.doj.gov>; Scarpelli, Anthony  
>>>> (USADC) <AScarpelli@usa.doj.gov>; Patel, Neeraj (USACT)  
>>>> <npatel2@usa.doj.gov>  
>>>> Subject: Re: Call Tomorrow (Special Counsel Investigation) Dear  
>>>> Andrew:  
>>>> We appreciate that you need the documents / data subject to the subpoenas to Georgia Tech. However, we are not a party to those subpoenas and have no knowledge of them. We are not the custodian of records for Georgia Tech, and our client is not the Principal Investigator on the DARPA contract or a professor of the College of Electrical Engineering. We have indicated that we do not believe that Mr. Dagon has any responsive Georgia Tech documents / data in his personal capacity. While our client may be helpful in pointing Georgia Tech to documents or data relevant to their subpoenas (if we are informed of their contents), responsibility for compliance lies with Georgia Tech. We respectfully request that the Special Counsel's team work with each party that it is seeking evidence from and not ask us to get in the middle. Georgia Tech needs to determine how it wants to respond to the subpoenas; we are more than happy to provide any assistance that would be useful to them.  
>>>> We hope you understand that we are trying to be cooperative. We would be happy to have a call with you and your team separately if that would be helpful.  
>>>> Best regards,  
>>>> Jody  
>>>> Jody R Westby, Esq.  
>>>> Managing Principal  
>>>> Global Cyber Legal LLC  
>>>> +1.202.255.2700  
>>>> westby@globalcyberlegal.com  
>>>> <https://protect2.fireeye.com/v1/url?k=7211baee-2d8a821e-72169e0b-ac>  
>>>> 1  
>>>> f  
>>>> 6

>>>> b0176b0-2941286214a1b996&q=1&e=3db575fb-ac73-4426-bd1f-7b6d618c069d

>>>> & u = http%3A%2F%2Fwww.globalcyberlegal.com%2F

>>>>> On Jul 20, 2021, at 10:24 PM, DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov> wrote:

>>>> Good Evening Counsel for Georgia Tech and Counsel for David Dagon,

>>>> We hope all is well. Can you please let us know when you are available for a joint call tomorrow -- preferably at either 11:30 AM, 2:20 PM or 3:30 PM? We would like to discuss your clients' compliance with recently issued federal grand jury subpoenas. It is important that we have this call to ensure timely and comprehensive compliance with the subpoenas. Thanks very much.

>>>> The Special Counsel Team

---

**From:** Elizabeth Young <eyoung@law.ga.gov>  
**Sent:** Monday, July 19, 2021 1:53 PM  
**To:** 'Andrew.DeFilippis@usdoj.gov'  
**Cc:** 'Fuller, Christian'; Wasch, Kate; Ling-Ling Nie (linglingnie@gatech.edu)  
**Subject:** Georgia Tech Subpoena 7-19-2021

Mr. DeFilippis,

I have been engaged to represent Georgia Tech and the University System of Georgia in responding to your 7/19 subpoena. I've been forwarded a copy of the subpoena and your email sent this afternoon.

I look forward to discussing your suggestions for identifying responsive materials. Would tomorrow morning at 10 AM work for a call to discuss? If not, let me know what times would be better for you.

Thank you,  
Beth Young



**Elizabeth (Beth) Young**  
Assistant Attorney General  
Office of the Attorney General Chris Carr  
Government Services & Employment  
(404) 458-3425  
eyoung@law.ga.gov  
Georgia Department of Law  
40 Capitol Square SW  
Atlanta, Georgia 30334

## Jotonna Tulloch

---

**From:** EYoung@LAW.GA.GOV  
**Sent:** Thursday, July 29, 2021 10:45 AM  
**To:** Andrew.DeFilippis@usdoj.gov  
**Cc:** christian.fuller@legal.gatech.edu; kate.wasch@legal.gatech.edu;  
John.Eckenrode@usdoj.gov; wbaldenberg@fbi.gov; Tim.Fuhrman@usdoj.gov;  
Michael.Keilty@usdoj.gov; Anthony.Scarpelli@usdoj.gov; Neeraj.Patel@usdoj.gov  
**Subject:** RE: Call Tomorrow (Special Counsel Investigation)

We are working on responding to the issues you've raised in this and your previous email. Sometime late afternoon would be best - would 4:00 work for you?

Beth Young  
Assistant Attorney General  
Office of the Attorney General Chris Carr Government Services & Employment  
(404) 458-3425  
mailto:eyoung@law.ga.gov  
Georgia Department of Law  
40 Capitol Square SW  
Atlanta, Georgia 30334

-----Original Message-----

**From:** DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
**Sent:** Thursday, July 29, 2021 6:44 AM  
**To:** Elizabeth Young <EYoung@LAW.GA.GOV>  
**Cc:** Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch, Kate <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>; Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli, Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj (USACT) <Neeraj.Patel@usdoj.gov>  
**Subject:** Re: Call Tomorrow (Special Counsel Investigation)

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Beth,

The white papers and related documents you produced to us are documents that \*we\* provided to Dr. Antonakakis's counsel for their client's review. That is where his counsel obtained them. It appears you have not located any responsive documents. We are also told by Mr. Dagon's counsel that he pointed you to a number of responsive records. We further understand that Michael Farrell likely has responsive documents. When are you available for a call today to discuss?

We may need a Georgia Tech custodian to testify in grand jury next week about the steps taken to search for responsive records. Let us know some times today when you are free.

Thanks.

> On Jul 28, 2021, at 10:59 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:

>

> I am sending you via Kiteworks a link to a folder containing the documents that Georgia Tech is able to produce with regard to the three categories of documents you asked us to search for during our 7/21 phone conference as follows:

>

> 1. White papers/analytical papers related to Trump/Alfa Bank/Yotaphone: We are providing copies of several white papers and related documents that we received via counsel for Dr. Antonakakis. We are not certain as to the origin and storage history of these documents and therefore cannot provide authentication for these documents as business records of Georgia Tech.

>

> 2. Email communications related to Trump/Alfa Bank/Yotaphone: You asked us to revisit our prior email production to ensure that no responsive communications had been overlooked in our earlier email response. A new search was conducted using the original search terms listed in the earlier subpoena, and added white papers and analytical papers to the request. The search did identify a number of emails that were not included in the initial production, although they appear to be irrelevant and are predominantly junk mail. However, I am providing them to you in order to demonstrate Tech's compliance with your request.

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> 3. You indicated that there was a "fairly large file of Trump related materials" that had been assembled for production to the office of Special Counsel Robert Muller or the DOJ. We are unable to locate such a file. I have been informed that Dr. Antonakakis has searched his server for such a file and did not find anything meeting that description.

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> If you would like me to add any additional recipients to the Kiteworks folder, please let me know.

>

> Thank you,

>

> Beth Young

> Assistant Attorney General

> Office of the Attorney General Chris Carr Government Services &

> Employment

> (404) 458-3425

> <mailto:eyoung@law.ga.gov>

> Georgia Department of Law

> 40 Capitol Square SW

> Atlanta, Georgia 30334

>

>

>

>

>

>

>

> -----Original Message-----

> From: DeFilippis, Andrew (USANYS) <[Andrew.DeFilippis@usdoj.gov](mailto:Andrew.DeFilippis@usdoj.gov)>

> Sent: Wednesday, July 28, 2021 6:37 AM

> To: Elizabeth Young <[EYoung@LAW.GA.GOV](mailto:EYoung@LAW.GA.GOV)>

> Cc: Fuller, Christian <[christian.fuller@legal.gatech.edu](mailto:christian.fuller@legal.gatech.edu)>; Wasch, Kate

> <[kate.wasch@legal.gatech.edu](mailto:kate.wasch@legal.gatech.edu)>; Eckenrode, John (JMD)

> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)  
> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;  
> Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli,  
> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj (USACT)  
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>> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
>> Sent: Friday, July 23, 2021 9:08 AM  
>> To: Elizabeth Young <EYoung@LAW.GA.GOV>  
>> Cc: Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch,  
>> Kate <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)  
>> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)  
>> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;  
>> Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli,  
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>>  
>> Can we say 4:30? Thank you.  
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>>>> On Jul 23, 2021, at 8:59 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:

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>>> I'm booked up this morning but available after lunch - how about 2:30? If that doesn't work let me know what does.

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>>>

>>> Beth Young

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>>> (404) 458-3425

>>> eyoung@law.ga.gov

>>> Georgia Department of Law

>>> 40 Capitol Square SW

>>> Atlanta, Georgia 30334

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>>> -----Original Message-----

>>> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>

>>> Sent: Thursday, July 22, 2021 10:17 PM

>>> To: Elizabeth Young <EYoung@LAW.GA.GOV>

>>> Cc: Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch,

>>> Kate <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)

>>> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)

>>> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;

>>> Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli,

>>> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj (USACT)

>>> <Neeraj.Patel@usdoj.gov>

>>> Subject: Re: Call Tomorrow (Special Counsel Investigation)

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>>>

>>> Beth,

>>> We hope all is well. Can you let us know some times tomorrow when you would be available for an update call?

>>>

>>> Thank you.

>>>

>>>

>>>

>>>>> On Jul 21, 2021, at 8:07 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:

>>>>> I'm available for a call at 3:30 today. Please let me know what number you'd like me to call.

>>>>> Elizabeth (Beth) Young

>>>>> Assistant Attorney General

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>>>>> Employment

>>>>> (404) 458-3425

>>>>> eyoung@law.ga.gov

>>>>> Georgia Department of Law

>>>>> 40 Capitol Square SW

>>>>> Atlanta, Georgia 30334

>>>> -----Original Message-----

>>>> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>

>>>> Sent: Wednesday, July 21, 2021 7:05 AM

>>>> To: Jody R Westby <westby@globalcyberlegal.com>

>>>> Cc: Elizabeth Young <EYoung@LAW.GA.GOV>; Mark Rasch

>>>> <rasch@globalcyberlegal.com>; Fuller, Christian

>>>> <christian.fuller@legal.gatech.edu>; Wasch, Kate

>>>> <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)

>>>> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)

>>>> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;

>>>> Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli,

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>>>> (USACT) <Neeraj.Patel@usdoj.gov>

>>>> Subject: RE: Call Tomorrow (Special Counsel Investigation)

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>>>> Jody, It is unfortunate that you are not willing to join a call with Georgia Tech's counsel for purposes of efficiency and to avoid delaying compliance with federal subpoenas. Regardless, can we please speak at 11:30 AM with you and Mark? Beth, would you then be available for a separate call with our team at either 2:30 PM or 3:30 PM?

>>>> -----Original Message-----

>>>> From: Jody R Westby <westby@globalcyberlegal.com>

>>>> Sent: Tuesday, July 20, 2021 11:23 PM

>>>> To: DeFilippis, Andrew (USANYS) <ADeFilippis@usa.doj.gov>

>>>> Cc: Elizabeth Young <EYoung@LAW.GA.GOV>; Mark Rasch

>>>> <rasch@globalcyberlegal.com>; Fuller, Christian

>>>> <christian.fuller@legal.gatech.edu>; Wasch, Kate

>>>> <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)

>>>> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)

>>>> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;

>>>> Keilty, Michael (USANYE) <MKeilty@usa.doj.gov>; Scarpelli, Anthony

>>>> (USADC) <AScarpelli@usa.doj.gov>; Patel, Neeraj (USACT)

>>>> <npatel2@usa.doj.gov>

>>>> Subject: Re: Call Tomorrow (Special Counsel Investigation) Dear

>>>> Andrew:

>>>> We appreciate that you need the documents / data subject to the subpoenas to Georgia Tech. However, we are not a party to those subpoenas and have no knowledge of them. We are not the custodian of records for Georgia Tech, and our client is not the Principal Investigator on the DARPA contract or a professor of the College of Electrical Engineering. We have indicated that we do not believe that Mr. Dagon has any responsive Georgia Tech documents / data in his personal capacity. While our client may be helpful in pointing Georgia Tech to documents or data relevant to their subpoenas (if we are informed of their contents), responsibility for compliance lies with Georgia Tech. We respectfully request that the Special Counsel's team work with each party that it is seeking evidence from and not ask us to get in the middle. Georgia Tech needs to determine how it wants to respond to the subpoenas; we are more than happy to provide any assistance that would be useful to them.

>>>> We hope you understand that we are trying to be cooperative. We would be happy to have a call with you and your team separately if that would be helpful.

>>>> Best regards,

>>>> Jody

>>>> Jody R Westby, Esq.

>>>> Managing Principal

>>>> Global Cyber Legal LLC

>>>> +1.202.255.2700

>>>> westby@globalcyberlegal.com

>>>> https://protect2.fireeye.com/v1/url?k=7211baee-2d8a821e-72169e0b-ac

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>>>> b0176b0-2941286214a1b996&q=1&e=3db575fb-ac73-4426-bd1f-7b6d618c069d

>>>> & u = http%3A%2F%2Fwww.globalcyberlegal.com%2F

>>>>> On Jul 20, 2021, at 10:24 PM, DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov> wrote:

>>>> Good Evening Counsel for Georgia Tech and Counsel for David Dagon,

>>>> We hope all is well. Can you please let us know when you are available for a joint call tomorrow -- preferably at either 11:30 AM, 2:20 PM or 3:30 PM? We would like to discuss your clients' compliance with recently issued federal grand jury subpoenas. It is important that we have this call to ensure timely and comprehensive compliance with the subpoenas. Thanks very much.

>>>> The Special Counsel Team

## Jotonna Tulloch

---

**From:** Elizabeth Young <eyoung@law.ga.gov>  
**Sent:** Wednesday, July 28, 2021 10:59 AM  
**To:** 'DeFilippis, Andrew (USANYS)'  
**Cc:** Fuller, Christian; Wasch, Kate; Eckenrode, John (JMD); Aldenberg, William B. (NH) (FBI); Fuhrman, Tim (JMD); Keilty, Michael (USANYE); Scarpelli, Anthony (USADC); Patel, Neeraj (USACT)  
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Thank you,

Beth Young  
Assistant Attorney General  
Office of the Attorney General Chris Carr Government Services & Employment  
(404) 458-3425  
mailto:eyoung@law.ga.gov  
Georgia Department of Law  
40 Capitol Square SW  
Atlanta, Georgia 30334

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Sent: Wednesday, July 28, 2021 6:37 AM

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Good morning Beth,

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> That's fine. Talk to you then.

>

> Beth Young

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> Subject: Re: Call Tomorrow (Special Counsel Investigation)

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>>> <npatel2@usa.doj.gov>

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>>> We hope you understand that we are trying to be cooperative. We would be happy to have a call with you and your team separately if that would be helpful.

>>> Best regards,

>>> Jody

>>> Jody R Westby, Esq.

>>> Managing Principal

>>> Global Cyber Legal LLC

>>> +1.202.255.2700

>>> westby@globalcyberlegal.com

>>> <https://protect2.fireeye.com/v1/url?k=7211baee-2d8a821e-72169e0b-ac1>

>>> f

>>> 6

>>> b0176b0-2941286214a1b996&q=1&e=3db575fb-ac73-4426-bd1f-7b6d618c069d&

>>> u = <http://www.globalcyberlegal.com>

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**Cc:** Fuller, Christian; Wasch, Kate; Eckenrode, John (JMD); Aldenberg, William B. (NH) (FBI); Fuhrman, Tim (JMD); Keilty, Michael (USANYE); Scarpelli, Anthony (USADC); Patel, Neeraj (USACT)  
**Subject:** RE: Call Tomorrow (Special Counsel Investigation)

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Assistant Attorney General  
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eyoung@law.ga.gov  
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>  
>  
>  
> -----Original Message-----

> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
> Sent: Thursday, July 22, 2021 10:17 PM  
> To: Elizabeth Young <EYoung@LAW.GA.GOV>  
> Cc: Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch, Kate  
> <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)  
> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)  
> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;  
> Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli,  
> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj (USACT)  
> <Neeraj.Patel@usdoj.gov>  
> Subject: Re: Call Tomorrow (Special Counsel Investigation)

>  
> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

>  
>  
> Beth,  
> We hope all is well. Can you let us know some times tomorrow when you would be available for an update call?

>  
> Thank you.

>  
>  
>  
>> On Jul 21, 2021, at 8:07 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:  
>> I'm available for a call at 3:30 today. Please let me know what number you'd like me to call.

>> Elizabeth (Beth) Young  
>> Assistant Attorney General  
>> Office of the Attorney General Chris Carr Government Services &  
>> Employment  
>> (404) 458-3425  
>> eyoung@law.ga.gov  
>> Georgia Department of Law  
>> 40 Capitol Square SW  
>> Atlanta, Georgia 30334

>> -----Original Message-----  
>> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
>> Sent: Wednesday, July 21, 2021 7:05 AM  
>> To: Jody R Westby <westby@globalcyberlegal.com>  
>> Cc: Elizabeth Young <EYoung@LAW.GA.GOV>; Mark Rasch  
>> <rasch@globalcyberlegal.com>; Fuller, Christian  
>> <christian.fuller@legal.gatech.edu>; Wasch, Kate  
>> <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)  
>> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)  
>> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;

>> Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli,  
>> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj (USACT)  
>> <Neeraj.Patel@usdoj.gov>  
>> Subject: RE: Call Tomorrow (Special Counsel Investigation)  
>> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.  
>> Jody, It is unfortunate that you are not willing to join a call with Georgia Tech's counsel for purposes of efficiency and to avoid delaying compliance with federal subpoenas. Regardless, can we please speak at 11:30 AM with you and Mark? Beth, would you then be available for a separate call with our team at either 2:30 PM or 3:30 PM?  
>> -----Original Message-----  
>> From: Jody R Westby <westby@globalcyberlegal.com>  
>> Sent: Tuesday, July 20, 2021 11:23 PM  
>> To: DeFilippis, Andrew (USANYS) <ADeFilippis@usa.doj.gov>  
>> Cc: Elizabeth Young <EYoung@LAW.GA.GOV>; Mark Rasch  
>> <rasch@globalcyberlegal.com>; Fuller, Christian  
>> <christian.fuller@legal.gatech.edu>; Wasch, Kate  
>> <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD)  
>> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)  
>> <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;  
>> Keilty, Michael (USANYE) <MKeilty@usa.doj.gov>; Scarpelli, Anthony  
>> (USADC) <AScarpelli@usa.doj.gov>; Patel, Neeraj (USACT)  
>> <npatel2@usa.doj.gov>  
>> Subject: Re: Call Tomorrow (Special Counsel Investigation) Dear  
>> Andrew:  
>> We appreciate that you need the documents / data subject to the subpoenas to Georgia Tech. However, we are not a party to those subpoenas and have no knowledge of them. We are not the custodian of records for Georgia Tech, and our client is not the Principal Investigator on the DARPA contract or a professor of the College of Electrical Engineering. We have indicated that we do not believe that Mr. Dagon has any responsive Georgia Tech documents / data in his personal capacity. While our client may be helpful in pointing Georgia Tech to documents or data relevant to their subpoenas (if we are informed of their contents), responsibility for compliance lies with Georgia Tech. We respectfully request that the Special Counsel's team work with each party that it is seeking evidence from and not ask us to get in the middle. Georgia Tech needs to determine how it wants to respond to the subpoenas; we are more than happy to provide any assistance that would be useful to them.  
>> We hope you understand that we are trying to be cooperative. We would be happy to have a call with you and your team separately if that would be helpful.  
>> Best regards,  
>> Jody  
>> Jody R Westby, Esq.  
>> Managing Principal  
>> Global Cyber Legal LLC  
>> +1.202.255.2700  
>> westby@globalcyberlegal.com  
>> <https://protect2.fireeye.com/v1/url?k=7211baee-2d8a821e-72169e0b-ac1f>  
>> 6  
>> b0176b0-2941286214a1b996&q=1&e=3db575fb-ac73-4426-bd1f-7b6d618c069d&u  
>> = http%3A%2F%2Fwww.globalcyberlegal.com%2F  
>> On Jul 20, 2021, at 10:24 PM, DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov> wrote:  
>> Good Evening Counsel for Georgia Tech and Counsel for David Dagon,  
>> We hope all is well. Can you please let us know when you are available for a joint call tomorrow -- preferably at either 11:30 AM, 2:20 PM or 3:30 PM? We would like to discuss your clients' compliance with recently issued federal grand jury subpoenas. It is important that we have this call to ensure timely and comprehensive compliance with the subpoenas. Thanks very much.

---

**From:** EYoung@LAW.GA.GOV  
**Sent:** Thursday, July 29, 2021 12:26 PM  
**To:** Andrew.DeFilippis@usdoj.gov  
**Cc:** kate.wasch@legal.gatech.edu; wbaldenberg@fbi.gov; Tim.Fuhrman@usdoj.gov; Michael.Keilty@usdoj.gov; Anthony.Scarpelli@usdoj.gov; Neeraj.Patel@usdoj.gov  
**Subject:** RE: Call Tomorrow (Special Counsel Investigation)

I now have a call that I need to take at 4, so could we make it 4:30?

Beth Young  
Assistant Attorney General  
Office of the Attorney General Chris Carr Government Services & Employment  
(404) 458-3425  
eyoung@law.ga.gov  
Georgia Department of Law  
40 Capitol Square SW  
Atlanta, Georgia 30334

-----Original Message-----

From: Elizabeth Young  
Sent: Thursday, July 29, 2021 10:45 AM  
To: 'DeFilippis, Andrew (USANYS)' <Andrew.DeFilippis@usdoj.gov>  
Cc: Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch, Kate <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>; Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli, Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj (USACT) <Neeraj.Patel@usdoj.gov>  
Subject: RE: Call Tomorrow (Special Counsel Investigation)

We are working on responding to the issues you've raised in this and your previous email. Sometime late afternoon would be best - would 4:00 work for you?

Beth Young  
Assistant Attorney General  
Office of the Attorney General Chris Carr Government Services & Employment  
(404) 458-3425  
mailto:eyoung@law.ga.gov  
Georgia Department of Law  
40 Capitol Square SW  
Atlanta, Georgia 30334

-----Original Message-----

From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>

Sent: Thursday, July 29, 2021 6:44 AM

To: Elizabeth Young <EYoung@LAW.GA.GOV>

Cc: Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch, Kate <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>; Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli, Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj (USACT) <Neeraj.Patel@usdoj.gov>

Subject: Re: Call Tomorrow (Special Counsel Investigation)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Beth,

The white papers and related documents you produced to us are documents that \*we\* provided to Dr. Antonakakis's counsel for their client's review. That is where his counsel obtained them. It appears you have not located any responsive documents. We are also told by Mr. Dagon's counsel that he pointed you to a number of responsive records. We further understand that Michael Farrell likely has responsive documents. When are you available for a call today to discuss?

We may need a Georgia Tech custodian to testify in grand jury next week about the steps taken to search for responsive records. Let us know some times today when you are free.

Thanks.

> On Jul 28, 2021, at 10:59 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:

>

> I am sending you via Kiteworks a link to a folder containing the documents that Georgia Tech is able to produce with regard to the three categories of documents you asked us to search for during our 7/21 phone conference as follows:

>

> 1. White papers/analytical papers related to Trump/Alfa Bank/Yotaphone: We are providing copies of several white papers and related documents that we received via counsel for Dr. Antonakakis. We are not certain as to the origin and storage history of these documents and therefore cannot provide authentication for these documents as business records of Georgia Tech.

>

> 2. Email communications related to Trump/Alfa Bank/Yotaphone: You asked us to revisit our prior email production to ensure that no responsive communications had been overlooked in our earlier email response. A new search was conducted using the original search terms listed in the earlier subpoena, and added white papers and analytical papers to the request. The search did identify a number of emails that were not included in the initial production, although they appear to be irrelevant and are predominantly junk mail. However, I am providing them to you in order to demonstrate Tech's compliance with your request.

>

> 3. You indicated that there was a "fairly large file of Trump related materials" that had been assembled for production to the office of Special Counsel Robert Muller or the DOJ. We are unable to locate such a file. I have been informed that Dr. Antonakakis has searched his server for such a file and did not find anything meeting that description.

>

> If you would like me to add any additional recipients to the Kiteworks folder, please let me know.

---

**From:** Wasch, Kate <kate.wasch@legal.gatech.edu>  
**Sent:** Friday, July 30, 2021 1:01 PM  
**To:** Jara, Ana  
**Cc:** Elizabeth Young  
**Subject:** RE: Dr. Antonakakis

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi, Ana. Can you add Beth to the call? I do not plan to attend.  
Kate

---

**From:** Jara, Ana <AJara@lowenstein.com>  
**Sent:** Friday, July 30, 2021 10:21 AM  
**To:** DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
**Cc:** Schamel, Mark <MSchamel@lowenstein.com>; Wasch, Kate <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli, Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj (USACT) <Neeraj.Patel@usdoj.gov>; Maddock, Adam M. (CyD) (FBI) <ammaddock@fbi.gov>; Beutler, Kristen M. (CG) (FBI) <kmbeutler@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>  
**Subject:** RE: Dr. Antonakakis

Done.

**Ana Jara**  
She | Her | Hers  
Counsel  
Lowenstein Sandler LLP

T: 202.753.3747  
F: 973.597.2400

---

**From:** DeFilippis, Andrew (USANYS) <[Andrew.DeFilippis@usdoj.gov](mailto:Andrew.DeFilippis@usdoj.gov)>  
**Sent:** Friday, July 30, 2021 10:14 AM  
**To:** Jara, Ana <[AJara@lowenstein.com](mailto:AJara@lowenstein.com)>  
**Cc:** Schamel, Mark <[MSchamel@lowenstein.com](mailto:MSchamel@lowenstein.com)>; [kate.wasch@legal.gatech.edu](mailto:kate.wasch@legal.gatech.edu); Eckenrode, John (JMD) <[John.Eckenrode@usdoj.gov](mailto:John.Eckenrode@usdoj.gov)>; Aldenberg, William B. (NH) (FBI) <[wbaldenberg@fbi.gov](mailto:wbaldenberg@fbi.gov)>; Keilty, Michael (USANYE) <[Michael.Keilty@usdoj.gov](mailto:Michael.Keilty@usdoj.gov)>; Scarpelli, Anthony (USADC) <[Anthony.Scarpelli@usdoj.gov](mailto:Anthony.Scarpelli@usdoj.gov)>; Patel, Neeraj (USACT) <[Neeraj.Patel@usdoj.gov](mailto:Neeraj.Patel@usdoj.gov)>; Maddock, Adam M. (CyD) (FBI) <[ammaddock@fbi.gov](mailto:ammaddock@fbi.gov)>; Beutler, Kristen M. (CG) (FBI) <[kmbeutler@fbi.gov](mailto:kmbeutler@fbi.gov)>; Fuhrman, Tim (JMD) <[Tim.Fuhrman@usdoj.gov](mailto:Tim.Fuhrman@usdoj.gov)>  
**Subject:** Re: Dr. Antonakakis

Thanks, would you mind adding Tim Fuhrman (copied) as well?

On Jul 30, 2021, at 10:09 AM, Jara, Ana <[AJara@lowenstein.com](mailto:AJara@lowenstein.com)> wrote:

I sent the calendar invite to all on this group along with Manos. Talk to you all then.

Best,  
Ana

**Ana Jara**  
She | Her | Hers  
Counsel  
Lowenstein Sandler LLP

T: 202.753.3747  
F: 973.597.2400

---

**From:** Schamel, Mark <[MSchamel@lowenstein.com](mailto:MSchamel@lowenstein.com)>  
**Sent:** Friday, July 30, 2021 10:07 AM  
**To:** DeFilippis, Andrew (USANYS) <[Andrew.DeFilippis@usdoj.gov](mailto:Andrew.DeFilippis@usdoj.gov)>  
**Cc:** Jara, Ana <[AJara@lowenstein.com](mailto:AJara@lowenstein.com)>; [kate.wasch@legal.gatech.edu](mailto:kate.wasch@legal.gatech.edu); Eckenrode, John (JMD) <[John.Eckenrode@usdoj.gov](mailto:John.Eckenrode@usdoj.gov)>; Aldenberg, William B. (NH) (FBI) <[wbaldenberg@fbi.gov](mailto:wbaldenberg@fbi.gov)>; Keilty, Michael (USANYE) <[Michael.Keilty@usdoj.gov](mailto:Michael.Keilty@usdoj.gov)>; Scarpelli, Anthony (USADC) <[Anthony.Scarpelli@usdoj.gov](mailto:Anthony.Scarpelli@usdoj.gov)>; Patel, Neeraj (USACT) <[Neeraj.Patel@usdoj.gov](mailto:Neeraj.Patel@usdoj.gov)>; Maddock, Adam M. (CyD) (FBI) <[ammaddock@fbi.gov](mailto:ammaddock@fbi.gov)>; Beutler, Kristen M. (CG) (FBI) <[kmbeutler@fbi.gov](mailto:kmbeutler@fbi.gov)>  
**Subject:** Re: Dr. Antonakakis

We can start at 1.  
Will send an invite now.

**Mark E. Schamel**  
Partner  
Lowenstein Sandler LLP

T: 202.753.3805  
M: 202.841.3401  
F: 973.597.2400



On Jul 30, 2021, at 7:24 AM, Schamel, Mark <[MSchamel@lowenstein.com](mailto:MSchamel@lowenstein.com)> wrote:

Will confirm as soon as I hear from Manos.

**Mark E. Schamel**  
Partner  
Lowenstein Sandler LLP

T: 202.753.3805  
M: 202.841.3401  
F: 973.597.2400



On Jul 30, 2021, at 7:08 AM, DeFilippis, Andrew (USANYS)  
<[Andrew.DeFilippis@usdoj.gov](mailto:Andrew.DeFilippis@usdoj.gov)> wrote:

Ok thank you, that works for us.

On Jul 30, 2021, at 7:04 AM, Schamel, Mark  
<[MSchamel@lowenstein.com](mailto:MSchamel@lowenstein.com)> wrote:

Andrew  
I can move some things around and do 1230 to 255. I  
will check with Ana and Manos.  
Mark

**Mark E. Schamel**  
Partner  
Lowenstein Sandler LLP

T: 202.753.3805  
M: 202.841.3401  
F: 973.597.2400



On Jul 29, 2021, at 6:26 PM, DeFilippis,  
Andrew (USANYS)  
<[Andrew.DeFilippis@usdoj.gov](mailto:Andrew.DeFilippis@usdoj.gov)> wrote:



---

**From:** EYoung@LAW.GA.GOV  
**Sent:** Friday, July 30, 2021 10:03 AM  
**To:** Andrew.DeFilippis@usdoj.gov; kate.wasch@legal.gatech.edu;  
westby@globalcyberlegal.com; rasch@globalcyberlegal.com  
**Cc:** John.Eckenrode@usdoj.gov; Anthony.Scarpelli@usdoj.gov; Michael.Keilty@usdoj.gov;  
Neeraj.Patel@usdoj.gov; Tim.Fuhrman@usdoj.gov; wbaldenberg@fbi.gov;  
ammaddock@fbi.gov  
**Subject:** RE: Rhannusia Logs

I reached out to Ms. Westby after our call yesterday and she confirmed that Mr. Dagon has copies of these chat logs and will be forwarding them to us so that we can review and produce them.

Beth Young  
Assistant Attorney General  
Office of the Attorney General Chris Carr Government Services & Employment  
(404) 458-3425  
eyoung@law.ga.gov  
Georgia Department of Law  
40 Capitol Square SW  
Atlanta, Georgia 30334

-----Original Message-----

From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
Sent: Friday, July 30, 2021 7:43 AM  
To: Elizabeth Young <EYoung@LAW.GA.GOV>; Kate Wasch <kate.wasch@legal.gatech.edu>; Jody R Westby <westby@globalcyberlegal.com>; Mark D. Rasch <rasch@globalcyberlegal.com>  
Cc: Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Scarpelli, Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Patel, Neeraj (USACT) <Neeraj.Patel@usdoj.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Maddock, Adam M. (CyD) (FBI) <ammaddock@fbi.gov>  
Subject: Rhannusia Logs

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

All,

As we have discussed with each of you, Mr. Dagon has identified "Rhannusia" chat communications that we understand are responsive to our subpoena and relevant to our investigation. We would like to obtain these communications promptly and would also like to minimize the burdens on all involved.

Beth, can you please confirm in response to this email that Georgia Tech authorizes and requests that Mr. Dagon provide those logs to the government as an employee of Georgia Tech? If you would like us to issue a subpoena for them specifically and will accept service, we can do so today.

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Ms. Young:

Thank you for your diligence in protecting DARPA-related records and other documents from unauthorized use or disclosure.

I have discussed this matter with Wes Bennett, the Director of the DARPA Contracts Management Office. Mr. Bennett is info-copied on this message. We request that you cooperate with the Department of Justice (DoJ) by immediately providing them with all DARPA-related unclassified documents and records in your possession and that are requested by their subpoena.

If DoJ has requested DARPA-related classified documents and records in your possession, release should be coordinated with Mr. Darin Smith, DARPA Security & Intelligence Directorate. Mr. Smith is info-copied on this message.

Please contact me if I can assist you.

Crane Lopes, Ph.D.  
General Counsel  
DARPA  
Off | 571.218.4887 📞  
Mob | 571.239.5084



Creating **BREAKTHROUGH TECHNOLOGIES**  
For National Security

---

**From:** DeFilippis, Andrew (USANYS) <[Andrew.DeFilippis@usdoj.gov](mailto:Andrew.DeFilippis@usdoj.gov)>  
**Sent:** Tuesday, July 20, 2021 10:51 AM  
**To:** Elizabeth Young <[EYoung@LAW.GA.GOV](mailto:EYoung@LAW.GA.GOV)>  
**Cc:** 'Fuller, Christian' <[christian.fuller@legal.gatech.edu](mailto:christian.fuller@legal.gatech.edu)>; Wasch, Kate <[kate.wasch@legal.gatech.edu](mailto:kate.wasch@legal.gatech.edu)>; Ling-Ling Nie ([linglingnie@gatech.edu](mailto:linglingnie@gatech.edu)) <[linglingnie@gatech.edu](mailto:linglingnie@gatech.edu)>; Lopes, Crane <[Crane.Lopes@darpa.mil](mailto:Crane.Lopes@darpa.mil)>; Keilty, Michael (USANYE) <[Michael.Keilty@usdoj.gov](mailto:Michael.Keilty@usdoj.gov)>; Patel, Neeraj (USACT) <[Neeraj.Patel@usdoj.gov](mailto:Neeraj.Patel@usdoj.gov)>; Scarpelli, Anthony (USADC) <[Anthony.Scarpelli@usdoj.gov](mailto:Anthony.Scarpelli@usdoj.gov)>; Eckenrode, John (JMD) <[John.Eckenrode@usdoj.gov](mailto:John.Eckenrode@usdoj.gov)>; Aldenberg, William B. (NH) (FBI) <[wbaldenberg@fbi.gov](mailto:wbaldenberg@fbi.gov)>; Maddock, Adam M. (CyD) (FBI) <[ammaddock@fbi.gov](mailto:ammaddock@fbi.gov)>; James, Ryan Joseph (INSD) (FBI) <[rjames@fbi.gov](mailto:rjames@fbi.gov)>  
**Subject:** DARPA

Ms. Young,

Thank you very much for our call earlier today. On that call, you requested that we provide assurance that the Defense Advanced Research Projects Agency (DARPA) has no objection to Georgia Tech's providing documents and other records in response to our federal grand jury subpoena that relate to a contract between Georgia Tech and DARPA. I am copying Crane Lopes, General Counsel of DARPA. Mr. Lopes and DARPA have been fully cooperative with and supportive of our investigative efforts. On a phone call that occurred a few minutes ago, Mr. Lopes has assured me again that DARPA has

---

**From:** Nie, Ling-Ling <linglingnie@gatech.edu>  
**Sent:** Monday, July 19, 2021 5:55 PM  
**To:** Elizabeth Young  
**Cc:** Fuller, Christian; Wasch, Kate  
**Subject:** Re: Georgia Tech Subpoena 7-19-2021

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thank you Beth! I won't be able to join this call but either Christian or Kate will. We look forward to working with you again!

---

**From:** DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
**Sent:** Monday, July 19, 2021 5:27:34 PM  
**To:** Elizabeth Young <EYoung@law.ga.gov>  
**Cc:** Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch, Kate <kate.wasch@legal.gatech.edu>; Nie, Ling-Ling <linglingnie@gatech.edu>  
**Subject:** Re: Georgia Tech Subpoena 7-19-2021

Yes 10:00 am tomorrow is perfect. Thank you. We can use the dial-in below.

Dial-in

Conference ID: [REDACTED]

On Jul 19, 2021, at 1:53 PM, Elizabeth Young <EYoung@law.ga.gov> wrote:

Mr. DeFilippis,

I have been engaged to represent Georgia Tech and the University System of Georgia in responding to your 7/19 subpoena. I've been forwarded a copy of the subpoena and your email sent this afternoon.

I look forward to discussing your suggestions for identifying responsive materials. Would tomorrow morning at 10 AM work for a call to discuss? If not, let me know what times would be better for you.

Thank you,  
Beth Young

<image001.jpg>

**Elizabeth (Beth) Young**  
Assistant Attorney General  
Office of the Attorney General Chris Carr

----- Forwarded message -----

From: Fuller, Christian <christian.fuller@legal.gatech.edu>

Date: Tue, Jul 20, 2021 at 3:18 PM

Subject: RE: DARPA

To: [REDACTED] >

Cc: Elizabeth Young <EYoung@law.ga.gov>

Jody—

DARPA's general counsel forwarded this response to Georgia Tech (see below). Based on the response, Georgia Tech can give authorization for David to release any unclassified, DARPA-related records that are considered Georgia Tech's property, pursuant to the DOJ investigative subpoena. My understanding is that David does not have any classified documents; however, if there are any classified documents, follow up with Mr. Darin Smith (as instructed below) before any exchange with DOJ.

If there are any questions or concerns, please feel free to reach out.

Thanks,

Christian Fuller  
Senior Counsel, Employment & Litigation  
Georgia Institute of Technology  
Phone: 404-403-8204  
christian.fuller@legal.gatech.edu

From: Lopes, Crane <Crane.Lopes@darpa.mil>

Sent: Tuesday, July 20, 2021 2:16 PM

To: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>; Elizabeth Young <EYoung@LAW.GA.GOV>

Cc: Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch, Kate <kate.wasch@legal.gatech.edu>; Nie, Ling-Ling <linglingnie@gatech.edu>; Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Patel, Neeraj (USACT) <Neeraj.Patel@usdoj.gov>; Scarpelli, Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Maddock, Adam M. (CyD) (FBI) <ammaddock@fbi.gov>; James, Ryan Joseph (INSD) (FBI) <rjjames@fbi.gov>; Bennett, Wes <wes.bennett@darpa.mil>; Smith, Darin <Darin.Smith@darpa.mil>  
Subject: RE: DARPA

Ms. Young:

Thank you for your diligence in protecting DARPA-related records and other documents from unauthorized use or disclosure.

I have discussed this matter with Wes Bennett, the Director of the DARPA Contracts Management Office. Mr. Bennett is info-copied on this message. We request that you cooperate with the Department of Justice (DoJ) by immediately providing them with all DARPA-related unclassified documents and records in your possession and that are requested by their subpoena.

If DoJ has requested DARPA-related classified documents and records in your possession, release should be coordinated with Mr. Darin Smith, DARPA Security & Intelligence Directorate. Mr. Smith is info-copied on this message.

Please contact me if I can assist you.

Crane Lopes, Ph.D.  
General Counsel  
DARPA

Off | 571.218.4887 📞  
Mob | 571.239.5084

<image004.jpg>Creating BREAKTHROUGH TECHNOLOGIES For National Security

From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>

Sent: Tuesday, July 20, 2021 10:51 AM

To: Elizabeth Young <EYoung@LAW.GA.GOV>

Cc: 'Fuller, Christian' <christian.fuller@legal.gatech.edu>; Wasch, Kate <kate.wasch@legal.gatech.edu>; Ling-Ling Nie (linglingnie@gatech.edu) <linglingnie@gatech.edu>; Lopes, Crane <Crane.Lopes@darpa.mil>; Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Patel, Neeraj (USACT) <Neeraj.Patel@usdoj.gov>; Scarpelli, Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Maddock, Adam M. (CyD) (FBI) <ammaddock@fbi.gov>; James, Ryan Joseph (INSD) (FBI) <rjjames@fbi.gov>

Subject: DARPA

Ms. Young,

Thank you very much for our call earlier today. On that call, you requested that we provide assurance that the Defense Advanced Research Projects Agency (DARPA) has no objection to Georgia Tech's providing documents and other records in response to our federal grand jury subpoena that relate to a contract between Georgia Tech and DARPA. I am copying Crane Lopes, General Counsel of DARPA. Mr. Lopes and DARPA have been fully cooperative with and supportive of our investigative efforts. On a phone call that occurred a few minutes ago, Mr. Lopes has assured me again that DARPA has no objections to Georgia Tech's provision of any records or information (both classified and unclassified) to our team and to the grand jury.

As noted, federal law requires you to provide such records regardless of any potentially applicable contractual restrictions.

Please let me know if you have any questions. We would appreciate if you could also please confirm that you consent to the two Georgia Tech employees we discussed providing responsive records that they have identified. Thank you.

Andrew J. DeFilippis  
Assistant Special Counsel  
U.S. Department of Justice  
(646) 530-0087  
<image005.jpg>



**UNITED STATES DISTRICT COURT**  
for the  
**District of Columbia**

**SUBPOENA TO TESTIFY BEFORE A GRAND JURY**

To: Georgia Institute of Technology/Georgia Tech Research Institute/Georgia Tech Research Corporations  
C/O Christian Fuller, Esq.

**YOU ARE COMMANDED** to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave.

Place: U.S. DISTRICT COURT FOR THE DISTRICT OF COLUMBIA U.S. Courthouse, 3 <sup>rd</sup> Floor Grand Jury #21-02 333 Constitution Avenue, N.W. Washington, D.C. 20001	Date and Time: July 22, 2021 at 9:00 AM
--	--

You must also bring with you the following documents, electronically stored information, or objects:

PLEASE SEE ATTACHMENT

You may provide the results directly to the Special Counsel's Office. If you choose to do so, we request that you send the returns to **Jack Eckenrode**, [john.eckenrode@usdoj.gov](mailto:john.eckenrode@usdoj.gov), U.S. Department of Justice, 145 N Street, NE, Room 3E.803, Washington, DC 20530, by July 29, 2021. If, however, you wish to personally appear before the Grand Jury to provide the records, please contact the undersigned Assistant Special Counsel

Date: July 14, 2021

CLERK OF COURT

  
Signature of Clerk or Deputy Clerk

---

The name, address, telephone number and email of the Assistant Special Counsel, who requests this subpoena, are:

Andrew J. DeFilippis  
Assistant Special Counsel  
U.S. Department of Justice  
145 N Street, NE  
Room 3E.803  
Washington, DC 20530

USAO #2020R01428

Email: [andrew.defilippis@usdoj.gov](mailto:andrew.defilippis@usdoj.gov); Phone: (646) 530-0087

---

Dagon will not be responsible for Georgia Tech's response to these criminal grand jury subpoenas; Georgia Tech is solely responsible for responding to these subpoenas.

>  
> We have never seen the first subpoena Georgia Tech produced or your production; nor have we seen this second subpoena. Although Georgia Tech agreed to an informal joint defense agreement, after we produced our subpoena and relevant documents, Georgia Tech pulled back from that and refused to share any information, including providing a copy of the relevant DARPA contract (Kate provided the wrong one earlier but refused to provide the Enhanced Attribution contract). We are also not privy to your discussions with the Special Counsel office. I am sure you can understand that this puts us in an untenable position. If you need any assistance from Mr. Dagon, please let us know.

> Kind regards,

> Jody

>  
> Jody R Westby, Esq.  
> Managing Principal  
> Global Cyber Legal LLC  
> +1.202.255.2700  
> westby@globalcyberlegal.com  
> www.globalcyberlegal.com

>  
>  
>  
> ----- Forwarded message -----

> From: Fuller, Christian <christian.fuller@legal.gatech.edu>

> Date: Tue, Jul 20, 2021 at 3:18 PM

> Subject: RE: DARPA

> To: [REDACTED]

> Cc: Elizabeth Young <EYoung@law.ga.gov>

>  
>  
> Jody—

>  
> DARPA's general counsel forwarded this response to Georgia Tech (see below). Based on the response, Georgia Tech can give authorization for David to release any unclassified, DARPA-related records that are considered Georgia Tech's property, pursuant to the DOJ investigative subpoena. My understanding is that David does not have any classified documents; however, if there are any classified documents, follow up with Mr. Darin Smith (as instructed below) before any exchange with DOJ.

>  
> If there are any questions or concerns, please feel free to reach out.

>  
> Thanks,

>  
>  
> Christian Fuller  
> Senior Counsel, Employment & Litigation Georgia Institute of  
> Technology  
> Phone: 404-403-8204  
> christian.fuller@legal.gatech.edu

>  
>  
> From: Lopes, Crane <Crane.Lopes@darpa.mil>  
> Sent: Tuesday, July 20, 2021 2:16 PM  
> To: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>;



> Elizabeth Young <EYoung@LAW.GA.GOV>  
> Cc: Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch, Kate  
> <kate.wasch@legal.gatech.edu>; Nie, Ling-Ling  
> <linglingnie@gatech.edu>; Keilty, Michael (USANYE)  
> <Michael.Keilty@usdoj.gov>; Patel, Neeraj (USACT)  
> <Neeraj.Patel@usdoj.gov>; Scarpelli, Anthony (USADC)  
> <Anthony.Scarpelli@usdoj.gov>; Eckenrode, John (JMD)  
> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)  
> <wbaldenberg@fbi.gov>; Maddock, Adam M. (CyD) (FBI)  
> <ammaddock@fbi.gov>; James, Ryan Joseph (INSD) (FBI)  
> <rjames@fbi.gov>; Bennett, Wes <wes.bennett@darpa.mil>; Smith, Darin  
> <Darin.Smith@darpa.mil>  
> Subject: RE: DARPA  
>  
> Ms. Young:  
>  
> Thank you for your diligence in protecting DARPA-related records and other documents from unauthorized use or disclosure.  
>  
> I have discussed this matter with Wes Bennett, the Director of the DARPA Contracts Management Office. Mr. Bennett is info-copied on this message. We request that you cooperate with the Department of Justice (DoJ) by immediately providing them with all DARPA-related unclassified documents and records in your possession and that are requested by their subpoena.  
>  
> If DoJ has requested DARPA-related classified documents and records in your possession, release should be coordinated with Mr. Darin Smith, DARPA Security & Intelligence Directorate. Mr. Smith is info-copied on this message.  
>  
> Please contact me if I can assist you.  
>  
> Crane Lopes, Ph.D.  
> General Counsel  
> DARPA  
> Off | 571.218.4887 📞  
> Mob | 571.239.5084  
>  
> <image004.jpg>Creating BREAKTHROUGH TECHNOLOGIES For National Security  
>  
>  
>  
>  
>  
>  
>  
> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
> Sent: Tuesday, July 20, 2021 10:51 AM  
> To: Elizabeth Young <EYoung@LAW.GA.GOV>  
> Cc: 'Fuller, Christian' <christian.fuller@legal.gatech.edu>; Wasch, Kate <kate.wasch@legal.gatech.edu>; Ling-Ling Nie <linglingnie@gatech.edu>; Lopes, Crane <Crane.Lopes@darpa.mil>; Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Patel, Neeraj (USACT) <Neeraj.Patel@usdoj.gov>; Scarpelli, Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Eckenrode, John (JMD)

> <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI)  
> <wbaldenberg@fbi.gov>; Maddock, Adam M. (CyD) (FBI)  
> <ammaddock@fbi.gov>; James, Ryan Joseph (INSD) (FBI) <rjjames@fbi.gov>  
> Subject: DARPA  
>  
> Ms. Young,  
>  
> Thank you very much for our call earlier today. On that call, you requested that we provide assurance that the Defense Advanced Research Projects Agency (DARPA) has no objection to Georgia Tech's providing documents and other records in response to our federal grand jury subpoena that relate to a contract between Georgia Tech and DARPA. I am copying Crane Lopes, General Counsel of DARPA. Mr. Lopes and DARPA have been fully cooperative with and supportive of our investigative efforts. On a phone call that occurred a few minutes ago, Mr. Lopes has assured me again that DARPA has no objections to Georgia Tech's provision of any records or information (both classified and unclassified) to our team and to the grand jury.  
>  
> As noted, federal law requires you to provide such records regardless of any potentially applicable contractual restrictions.  
>  
> Please let me know if you have any questions. We would appreciate if you could also please confirm that you consent to the two Georgia Tech employees we discussed providing responsive records that they have identified. Thank you.  
>  
> Andrew J. DeFilippis  
> Assistant Special Counsel  
> U.S. Department of Justice  
> (646) 530-0087  
> <image005.jpg>  
>  
> <Georgia-Tech-Subpoena-July-14-2021 (002).pdf>

---

**From:** William Aldenberg <wbaldenberg@fbi.gov>  
**Sent:** Friday, July 23, 2021 9:31 AM  
**To:** Elizabeth Young; Andrew.DeFilippis@usdoj.gov  
**Cc:** Fuller, Christian; Wasch, Kate; John.Eckenrode@usdoj.gov; Tim.Fuhrman@usdoj.gov; Michael.Keilty@usdoj.gov; Anthony.Scarpelli@usdoj.gov; Neeraj.Patel@usdoj.gov  
**Subject:** Re: Call Tomorrow (Special Counsel Investigation)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I'm available

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**From:** DeFilippis, Andrew (USANYS)  
**Sent:** Friday, July 23, 2021 9:07:36 AM  
**To:** Elizabeth Young  
**Cc:** Fuller, Christian ; Wasch, Kate ; Eckenrode, John (JMD) ; Aldenberg, William B. (NH) (FBI) ; Fuhrman, Tim (JMD) ; Keilty, Michael (USANYE) ; Scarpelli, Anthony (USADC) ; Patel, Neeraj (USACT)  
**Subject:** [EXTERNAL EMAIL] - Re: Call Tomorrow (Special Counsel Investigation)  
Can we say 4:30? Thank you.

> On Jul 23, 2021, at 8:59 AM, Elizabeth Young wrote:

>  
> I'm booked up this morning but available after lunch - how about 2:30? If that doesn't work let me know what does.

>  
>  
> Beth Young  
> Assistant Attorney General  
> Office of the Attorney General Chris Carr  
> Government Services & Employment  
> (404) 458-3425  
> eyoung@law.ga.gov  
> Georgia Department of Law  
> 40 Capitol Square SW  
> Atlanta, Georgia 30334

>  
>  
>  
> -----Original Message-----

> From: DeFilippis, Andrew (USANYS)  
> Sent: Thursday, July 22, 2021 10:17 PM  
> To: Elizabeth Young  
> Cc: Fuller, Christian ; Wasch, Kate ; Eckenrode, John (JMD) ; Aldenberg, William B. (NH) (FBI) ; Fuhrman, Tim (JMD) ; Keilty, Michael (USANYE) ; Scarpelli, Anthony (USADC) ; Patel, Neeraj (USACT)  
> Subject: Re: Call Tomorrow (Special Counsel Investigation)

>  
> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

>  
>

---

**From:** Elizabeth Young <eyoung@law.ga.gov>  
**Sent:** Wednesday, July 21, 2021 10:43 AM  
**To:** 'Jody R Westby'  
**Subject:** RE: Call Tomorrow (Special Counsel Investigation)

Hi Jody,

Just letting you know that I was still copied on this email so that you can take me off of any future correspondence you might not want to include me in. I'll delete and disregard. Look forward to speaking with you soon.

Beth Young  
Assistant Attorney General  
Office of the Attorney General Chris Carr Government Services & Employment  
(404) 458-3425  
eyoung@law.ga.gov  
Georgia Department of Law  
40 Capitol Square SW  
Atlanta, Georgia 30334

-----Original Message-----

From: Jody R Westby <westby@globalcyberlegal.com>  
Sent: Wednesday, July 21, 2021 10:31 AM  
To: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
Cc: Elizabeth Young <EYoung@LAW.GA.GOV>; Mark Rasch <rasch@globalcyberlegal.com>; Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>; Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli, Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj (USACT) <Neeraj.Patel@usdoj.gov>  
Subject: Re: Call Tomorrow (Special Counsel Investigation)

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Andrew,

I have removed Georgia Tech from this email. Please do not characterize our response as uncooperative; it is not. You are asking us to inappropriately get involved in Georgia Tech's production. It is unfortunate that the Special Counsel Team was not pursuing the documents they requested from Georgia Tech since the initial subpoena last fall. Please work out their production with them. As noted below, we are happy to assist them as necessary. As you may recall, I am teaching a course from 11 a.m. to noon and am in the Uniform Law Commission meeting from 2:30 to 4:00 p.m. Can we talk after 4 p.m., just us and your team? Would be happy to.

Thank you.

Kind regards,

Jody

Jody R Westby, Esq.  
Managing Principal  
Global Cyber Legal LLC  
+1.202.255.2700  
westby@globalcyberlegal.com  
www.globalcyberlegal.com

On Jul 21, 2021, at 7:04 AM, DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov> wrote:

Jody, It is unfortunate that you are not willing to join a call with Georgia Tech's counsel for purposes of efficiency and to avoid delaying compliance with federal subpoenas. Regardless, can we please speak at 11:30 AM with you and Mark? Beth, would you then be available for a separate call with our team at either 2:30 PM or 3:30 PM?

-----Original Message-----

From: Jody R Westby <westby@globalcyberlegal.com>  
Sent: Tuesday, July 20, 2021 11:23 PM  
To: DeFilippis, Andrew (USANYS) <ADeFilippis@usa.doj.gov>  
Cc: Elizabeth Young <EYoung@LAW.GA.GOV>; Mark Rasch <rasch@globalcyberlegal.com>; Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch, Kate <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>; Keilty, Michael (USANYE) <MKeilty@usa.doj.gov>; Scarpelli, Anthony (USADC) <AScarpelli@usa.doj.gov>; Patel, Neeraj (USACT) <npatel2@usa.doj.gov>  
Subject: Re: Call Tomorrow (Special Counsel Investigation)

Dear Andrew:

We appreciate that you need the documents / data subject to the subpoenas to Georgia Tech. However, we are not a party to those subpoenas and have no knowledge of them. We are not the custodian of records for Georgia Tech, and our client is not the Principal Investigator on the DARPA contract or a professor of the College of Electrical Engineering. We have indicated that we do not believe that Mr. Dagon has any responsive Georgia Tech documents / data in his personal capacity. While our client may be helpful in pointing Georgia Tech to documents or data relevant to their subpoenas (if we are informed of their contents), responsibility for compliance lies with Georgia Tech. We respectfully request that the Special Counsel's team work with each party that it is seeking evidence from and not ask us to get in the middle. Georgia Tech needs to determine how it wants to respond to the subpoenas; we are more than happy to provide any assistance that would be useful to them.

We hope you understand that we are trying to be cooperative. We would be happy to have a call with you and your team separately if that would be helpful.

Best regards,  
Jody

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On Jul 20, 2021, at 10:24 PM, DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov> wrote:

Good Evening Counsel for Georgia Tech and Counsel for David Dagon,

We hope all is well. Can you please let us know when you are available for a joint call tomorrow -- preferably at either 11:30 AM, 2:20 PM or 3:30 PM? We would like to discuss your clients' compliance with recently issued federal grand jury subpoenas. It is important that we have this call to ensure timely and comprehensive compliance with the subpoenas. Thanks very much.

The Special Counsel Team

---

**From:** Jody R Westby <westby@globalcyberlegal.com>  
**Sent:** Wednesday, July 21, 2021 10:31 AM  
**To:** DeFilippis, Andrew (USANYS)  
**Cc:** Elizabeth Young; Mark Rasch; Eckenrode, John (JMD); Aldenberg, William B. (NH) (FBI); Fuhrman, Tim (JMD); Keilty, Michael (USANYE); Scarpelli, Anthony (USADC); Patel, Neeraj (USACT)  
**Subject:** Re: Call Tomorrow (Special Counsel Investigation)

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To: DeFilippis, Andrew (USANYS) <ADeFilippis@usa.doj.gov>  
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<Tim.Fuhrman@usdoj.gov>; Keilty, Michael (USANYE) <MKeilty@usa.doj.gov>; Scarpelli, Anthony (USADC) <AScarpelli@usa.doj.gov>; Patel, Neeraj (USACT) <npatel2@usa.doj.gov>  
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Jody

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Managing Principal  
Global Cyber Legal LLC  
+1.202.255.2700  
westby@globalcyberlegal.com  
<https://protect2.fireeye.com/v1/url?k=7211baee-2d8a821e-72169e0b-ac1f6b0176b0-2941286214a1b996&q=1&e=3db575fb-ac73-4426-bd1f-7b6d618c069d&u=http%3A%2F%2Fwww.globalcyberlegal.com%2F>

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The Special Counsel Team



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**To:** DeFilippis, Andrew (USANYS)  
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The Special Counsel Team

Beth Young  
Assistant Attorney General  
Office of the Attorney General Chris Carr Government Services & Employment  
(404) 458-3425  
eyoung@law.ga.gov  
Georgia Department of Law  
40 Capitol Square SW  
Atlanta, Georgia 30334

-----Original Message-----

From: Jody R Westby <westby@globalcyberlegal.com>  
Sent: Wednesday, July 21, 2021 10:31 AM  
To: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
Cc: Elizabeth Young <EYoung@LAW.GA.GOV>; Mark Rasch <rasch@globalcyberlegal.com>; Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>; Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Scarpelli, Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Patel, Neeraj (USACT) <Neeraj.Patel@usdoj.gov>  
Subject: Re: Call Tomorrow (Special Counsel Investigation)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Andrew,

I have removed Georgia Tech from this email. Please do not characterize our response as uncooperative; it is not. You are asking us to inappropriately get involved in Georgia Tech's production. It is unfortunate that the Special Counsel Team was not pursuing the documents they requested from Georgia Tech since the initial subpoena last fall. Please work out their production with them. As noted below, we are happy to assist them as necessary. As you may recall, I am teaching a course from 11 a.m. to noon and am in the Uniform Law Commission meeting from 2:30 to 4:00 p.m. Can we talk after 4 p.m., just us and your team? Would be happy to.

Thank you.

Kind regards,

Jody

Jody R Westby, Esq.  
Managing Principal  
Global Cyber Legal LLC  
+1.202.255.2700  
westby@globalcyberlegal.com  
www.globalcyberlegal.com

On Jul 21, 2021, at 7:04 AM, DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov> wrote:

Jody, It is unfortunate that you are not willing to join a call with Georgia Tech's counsel for purposes of efficiency and to avoid delaying compliance with federal subpoenas. Regardless, can we please speak at 11:30 AM with you and Mark? Beth, would you then be available for a separate call with our team at either 2:30 PM or 3:30 PM?

-----Original Message-----

From: Jody R Westby <westby@globalcyberlegal.com>

Sent: Tuesday, July 20, 2021 11:23 PM

To: DeFilippis, Andrew (USANYS) <ADeFilippis@usa.doj.gov>

Cc: Elizabeth Young <EYoung@LAW.GA.GOV>; Mark Rasch <rasch@globalcyberlegal.com>; Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch, Kate <kate.wasch@legal.gatech.edu>; Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>; Keilty, Michael (USANYE) <MKeilty@usa.doj.gov>; Scarpelli, Anthony (USADC) <AScarpelli@usa.doj.gov>; Patel, Neeraj (USACT) <npatel2@usa.doj.gov>

Subject: Re: Call Tomorrow (Special Counsel Investigation)

Dear Andrew:

We appreciate that you need the documents / data subject to the subpoenas to Georgia Tech. However, we are not a party to those subpoenas and have no knowledge of them. We are not the custodian of records for Georgia Tech, and our client is not the Principal Investigator on the DARPA contract or a professor of the College of Electrical Engineering. We have indicated that we do not believe that Mr. Dagon has any responsive Georgia Tech documents / data in his personal capacity. While our client may be helpful in pointing Georgia Tech to documents or data relevant to their subpoenas (if we are informed of their contents), responsibility for compliance lies with Georgia Tech. We respectfully request that the Special Counsel's team work with each party that it is seeking evidence from and not ask us to get in the middle. Georgia Tech needs to determine how it wants to respond to the subpoenas; we are more than happy to provide any assistance that would be useful to them.

We hope you understand that we are trying to be cooperative. We would be happy to have a call with you and your team separately if that would be helpful.

Best regards,

Jody

Jody R Westby, Esq.

Managing Principal

Global Cyber Legal LLC

+1.202.255.2700

westby@globalcyberlegal.com

<https://protect2.fireeye.com/v1/url?k=7211baee-2d8a821e-72169e0b-ac1f6b0176b0-2941286214a1b996&q=1&e=3db575fb-ac73-4426-bd1f-7b6d618c069d&u=http%3A%2F%2Fwww.globalcyberlegal.com%2F>

On Jul 20, 2021, at 10:24 PM, DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov> wrote:

Good Evening Counsel for Georgia Tech and Counsel for David Dagon,

We hope all is well. Can you please let us know when you are available for a joint call tomorrow -- preferably at either 11:30 AM, 2:20 PM or 3:30 PM? We would like to discuss your clients' compliance with recently issued federal grand jury subpoenas. It is important that we have this call to ensure timely and comprehensive compliance with the subpoenas. Thanks very much.

The Special Counsel Team

Dagon will not be responsible for Georgia Tech's response to these criminal grand jury subpoenas; Georgia Tech is solely responsible for responding to these subpoenas.

We have never seen the first subpoena Georgia Tech produced or your production; nor have we seen this second subpoena. Although Georgia Tech agreed to an informal joint defense agreement, after we produced our subpoena and relevant documents, Georgia Tech pulled back from that and refused to share any information, including providing a copy of the relevant DARPA contract (Kate provided the wrong one earlier but refused to provide the Enhanced Attribution contract). We are also not privy to your discussions with the Special Counsel office. I am sure you can understand that this puts us in an untenable position. If you need any assistance from Mr. Dagon, please let us know. Kind regards,  
Jody

Jody R Westby, Esq.  
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+1.202.255.2700  
westby@globalcyberlegal.com  
www.globalcyberlegal.com

----- Forwarded message -----

From: Fuller, Christian <christian.fuller@legal.gatech.edu>  
Date: Tue, Jul 20, 2021 at 3:18 PM  
Subject: RE: DARPA  
To: [REDACTED] >  
Cc: Elizabeth Young <EYoung@law.ga.gov>

Jody—

DARPA's general counsel forwarded this response to Georgia Tech (see below). Based on the response, Georgia Tech can give authorization for David to release any unclassified, DARPA-related records that are considered Georgia Tech's property, pursuant to the DOJ investigative subpoena. My understanding is that David does not have any classified documents; however, if there are any classified documents, follow up with Mr. Darin Smith (as instructed below) before any exchange with DOJ.

If there are any questions or concerns, please feel free to reach out.

Thanks,

Christian Fuller  
Senior Counsel, Employment & Litigation  
Georgia Institute of Technology  
Phone: 404-403-8204  
christian.fuller@legal.gatech.edu

From: Lopes, Crane <Crane.Lopes@darpa.mil>  
Sent: Tuesday, July 20, 2021 2:16 PM  
To: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>; Elizabeth Young <EYoung@LAW.GA.GOV>

Cc: Fuller, Christian <christian.fuller@legal.gatech.edu>; Wasch, Kate <kate.wasch@legal.gatech.edu>; Nie, Ling-Ling <linglingnie@gatech.edu>; Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Patel, Neeraj (USACT) <Neeraj.Patel@usdoj.gov>; Scarpelli, Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Maddock, Adam M. (CyD) (FBI) <ammaddock@fbi.gov>; James, Ryan Joseph (INSD) (FBI) <rjjames@fbi.gov>; Bennett, Wes <wes.bennett@darpa.mil>; Smith, Darin <Darin.Smith@darpa.mil>  
Subject: RE: DARPA

Ms. Young:


Thank you for your diligence in protecting DARPA-related records and other documents from unauthorized use or disclosure.

I have discussed this matter with Wes Bennett, the Director of the DARPA Contracts Management Office. Mr. Bennett is info-copied on this message. We request that you cooperate with the Department of Justice (DoJ) by immediately providing them with all DARPA-related unclassified documents and records in your possession and that are requested by their subpoena.

If DoJ has requested DARPA-related classified documents and records in your possession, release should be coordinated with Mr. Darin Smith, DARPA Security & Intelligence Directorate. Mr. Smith is info-copied on this message.

Please contact me if I can assist you.

Crane Lopes, Ph.D.  
General Counsel  
DARPA

Off | 571.218.4887   
Mob | 571.239.5084

<image004.jpg>Creating BREAKTHROUGH TECHNOLOGIES For National Security

From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
Sent: Tuesday, July 20, 2021 10:51 AM  
To: Elizabeth Young <EYoung@LAW.GA.GOV>  
Cc: 'Fuller, Christian' <christian.fuller@legal.gatech.edu>; Wasch, Kate <kate.wasch@legal.gatech.edu>; Ling-Ling Nie (linglingnie@gatech.edu) <linglingnie@gatech.edu>; Lopes, Crane <Crane.Lopes@darpa.mil>; Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Patel, Neeraj (USACT) <Neeraj.Patel@usdoj.gov>; Scarpelli, Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Maddock, Adam M. (CyD) (FBI) <ammaddock@fbi.gov>; James, Ryan Joseph (INSD) (FBI) <rjjames@fbi.gov>  
Subject: DARPA

Ms. Young,

Thank you very much for our call earlier today. On that call, you requested that we provide assurance that the Defense Advanced Research Projects Agency (DARPA) has no objection to Georgia Tech's providing documents and other records in response to our federal grand jury subpoena that relate to a contract between Georgia Tech and DARPA. I am copying

We have never seen the first subpoena Georgia Tech produced or your production; nor have we seen this second subpoena. Although Georgia Tech agreed to an informal joint defense agreement, after we produced our subpoena and relevant documents, Georgia Tech pulled back from that and refused to share any information, including providing a copy of the relevant DARPA contract (Kate provided the wrong one earlier but refused to provide the Enhanced Attribution contract). We are also not privy to your discussions with the Special Counsel office. I am sure you can understand that this puts us in an untenable position. If you need any assistance from Mr. Dagon, please let us know. Kind regards,  
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----- Forwarded message -----

From: Fuller, Christian <christian.fuller@legal.gatech.edu>  
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Subject: RE: DARPA  
To: [REDACTED] >  
Cc: Elizabeth Young <EYoung@law.ga.gov>

Jody—

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If there are any questions or concerns, please feel free to reach out.

Thanks,

Christian Fuller  
Senior Counsel, Employment & Litigation  
Georgia Institute of Technology  
Phone: 404-403-8204  
christian.fuller@legal.gatech.edu

From: Lopes, Crane <Crane.Lopes@darpa.mil>  
Sent: Tuesday, July 20, 2021 2:16 PM  
To: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>; Elizabeth Young <EYoung@LAW.GA.GOV>  
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<Neeraj.Patel@usdoj.gov>; Scarpelli, Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Maddock, Adam M. (CyD) (FBI) <ammaddock@fbi.gov>; James, Ryan Joseph (INSD) (FBI) <rjjames@fbi.gov>; Bennett, Wes <wes.bennett@darpa.mil>; Smith, Darin <Darin.Smith@darpa.mil>  
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If DoJ has requested DARPA-related classified documents and records in your possession, release should be coordinated with Mr. Darin Smith, DARPA Security & Intelligence Directorate. Mr. Smith is info-copied on this message.

Please contact me if I can assist you.

Crane Lopes, Ph.D.  
General Counsel  
DARPA  
Off | 571.218.4887 📞  
Mob | 571.239.5084

<image004.jpg>Creating BREAKTHROUGH TECHNOLOGIES For National Security

From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>  
Sent: Tuesday, July 20, 2021 10:51 AM  
To: Elizabeth Young <EYoung@LAW.GA.GOV>  
Cc: 'Fuller, Christian' <christian.fuller@legal.gatech.edu>; Wasch, Kate <kate.wasch@legal.gatech.edu>; Ling-Ling Nie (linglingnie@gatech.edu) <linglingnie@gatech.edu>; Lopes, Crane <Crane.Lopes@darpa.mil>; Keilty, Michael (USANYE) <Michael.Keilty@usdoj.gov>; Patel, Neeraj (USACT) <Neeraj.Patel@usdoj.gov>; Scarpelli, Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Maddock, Adam M. (CyD) (FBI) <ammaddock@fbi.gov>; James, Ryan Joseph (INSD) (FBI) <rjjames@fbi.gov>  
Subject: DARPA

Ms. Young,

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Subject: RE: DARPA

To: [REDACTED] >

Cc: Elizabeth Young <[EYoung@law.ga.gov](mailto:EYoung@law.ga.gov)>

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Thanks,

**Christian Fuller**

Senior Counsel, Employment & Litigation

Georgia Institute of Technology

Phone: 404-403-8204

[christian.fuller@legal.gatech.edu](mailto:christian.fuller@legal.gatech.edu)

---

**From:** Lopes, Crane <[Crane.Lopes@darpa.mil](mailto:Crane.Lopes@darpa.mil)>

**Sent:** Tuesday, July 20, 2021 2:16 PM

**To:** DeFilippis, Andrew (USANYS) <[Andrew.DeFilippis@usdoj.gov](mailto:Andrew.DeFilippis@usdoj.gov)>; Elizabeth Young <[EYoung@LAW.GA.GOV](mailto:EYoung@LAW.GA.GOV)>

**Cc:** Fuller, Christian <[christian.fuller@legal.gatech.edu](mailto:christian.fuller@legal.gatech.edu)>; Wasch, Kate <[kate.wasch@legal.gatech.edu](mailto:kate.wasch@legal.gatech.edu)>; Nie, Ling-Ling <[linglingnie@gatech.edu](mailto:linglingnie@gatech.edu)>; Keilty, Michael (USANYE) <[Michael.Keilty@usdoj.gov](mailto:Michael.Keilty@usdoj.gov)>; Patel, Neeraj (USACT) <[Neeraj.Patel@usdoj.gov](mailto:Neeraj.Patel@usdoj.gov)>; Scarpelli, Anthony (USADC) <[Anthony.Scarpelli@usdoj.gov](mailto:Anthony.Scarpelli@usdoj.gov)>; Eckenrode, John (JMD) <[John.Eckenrode@usdoj.gov](mailto:John.Eckenrode@usdoj.gov)>; Aldenberg, William B. (NH) (FBI) <[wbaldenberg@fbi.gov](mailto:wbaldenberg@fbi.gov)>; Maddock, Adam M. (CyD) (FBI) <[ammaddock@fbi.gov](mailto:ammaddock@fbi.gov)>; James, Ryan Joseph



---

**From:** DeFilippis, Andrew (USANYS) <[Andrew.DeFilippis@usdoj.gov](mailto:Andrew.DeFilippis@usdoj.gov)>  
**Sent:** Tuesday, July 20, 2021 10:51 AM  
**To:** Elizabeth Young <[EYoung@LAW.GA.GOV](mailto:EYoung@LAW.GA.GOV)>  
**Cc:** 'Fuller, Christian' <[christian.fuller@legal.gatech.edu](mailto:christian.fuller@legal.gatech.edu)>; Wasch, Kate <[kate.wasch@legal.gatech.edu](mailto:kate.wasch@legal.gatech.edu)>; Ling-Ling Nie ([linglingnie@gatech.edu](mailto:linglingnie@gatech.edu)) <[linglingnie@gatech.edu](mailto:linglingnie@gatech.edu)>; Lopes, Crane <[Crane.Lopes@darpa.mil](mailto:Crane.Lopes@darpa.mil)>; Keilty, Michael (USANYE) <[Michael.Keilty@usdoj.gov](mailto:Michael.Keilty@usdoj.gov)>; Patel, Neeraj (USACT) <[Neeraj.Patel@usdoj.gov](mailto:Neeraj.Patel@usdoj.gov)>; Scarpelli, Anthony (USADC) <[Anthony.Scarpelli@usdoj.gov](mailto:Anthony.Scarpelli@usdoj.gov)>; Eckenrode, John (JMD) <[John.Eckenrode@usdoj.gov](mailto:John.Eckenrode@usdoj.gov)>; Aldenberg, William B. (NH) (FBI) <[wbaldenberg@fbi.gov](mailto:wbaldenberg@fbi.gov)>; Maddock, Adam M. (CyD) (FBI) <[ammaddock@fbi.gov](mailto:ammaddock@fbi.gov)>; James, Ryan Joseph (INSD) (FBI) <[rjames@fbi.gov](mailto:rjames@fbi.gov)>  
**Subject:** DARPA

Ms. Young,

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As noted, federal law requires you to provide such records regardless of any potentially applicable contractual restrictions.

Please let me know if you have any questions. We would appreciate if you could also please confirm that you consent to the two Georgia Tech employees we discussed providing responsive records that they have identified. Thank you.

Andrew J. DeFilippis

---

**From:** Jody R Westby <westby@globalcyberlegal.com>  
**Sent:** Friday, July 30, 2021 11:44 AM  
**To:** DeFilippis, Andrew (USANYS)  
**Cc:** Elizabeth Young; Kate Wasch; Mark D. Rasch; Eckenrode, John (JMD); Scarpelli, Anthony(USADC); Keilty, Michael (USANYE); Patel, Neeraj (USACT); Fuhrman, Tim (JMD); Aldenberg, William B. (NH)(FBI); Maddock, Adam M. (CyD) (FBI)  
**Subject:** Re: Rhannusia Logs

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Working on getting these now. Will be back in touch. Understand the priority. Thanks!

Jody R Westby, Esq.  
Managing Principal  
Global Cyber Legal LLC  
+1.202.255.2700  
westby@globalcyberlegal.com  
www.globalcyberlegal.com

On Jul 30, 2021, at 10:04 AM, DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov> wrote:

Excellent thanks very much.

> On Jul 30, 2021, at 10:02 AM, Elizabeth Young <EYoung@law.ga.gov> wrote:

>

> I reached out to Ms. Westby after our call yesterday and she confirmed that Mr. Dagon has copies of these chat logs and will be forwarding them to us so that we can review and produce them.

>

> Beth Young  
> Assistant Attorney General  
> Office of the Attorney General Chris Carr Government Services &  
> Employment  
> (404) 458-3425  
> eyoung@law.ga.gov  
> Georgia Department of Law  
> 40 Capitol Square SW  
> Atlanta, Georgia 30334

>

>

>

> -----Original Message-----

> From: DeFilippis, Andrew (USANYS) <Andrew.DeFilippis@usdoj.gov>

> Sent: Friday, July 30, 2021 7:43 AM

> To: Elizabeth Young <EYoung@LAW.GA.GOV>; Kate Wasch  
> <kate.wasch@legal.gatech.edu>; Jody R Westby  
> <westby@globalcyberlegal.com>; Mark D. Rasch  
> <rasch@globalcyberlegal.com>  
> Cc: Eckenrode, John (JMD) <John.Eckenrode@usdoj.gov>; Scarpelli,  
> Anthony (USADC) <Anthony.Scarpelli@usdoj.gov>; Keilty, Michael  
> (USANYE) <Michael.Keilty@usdoj.gov>; Patel, Neeraj (USACT)  
> <Neeraj.Patel@usdoj.gov>; Fuhrman, Tim (JMD) <Tim.Fuhrman@usdoj.gov>;  
> Aldenberg, William B. (NH) (FBI) <wbaldenberg@fbi.gov>; Maddock, Adam  
> M. (CyD) (FBI) <ammaddock@fbi.gov>  
> Subject: Rhannusia Logs  
>  
> CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you  
recognize the sender and know the content is safe.  
>  
>  
> All,  
>  
> As we have discussed with each of you, Mr. Dagon has identified "Rhamnusia" chat communications that we  
understand are responsive to our subpoena and relevant to our investigation. We would like to obtain these  
communications promptly and would also like to minimize the burdens on all involved.  
>  
> Beth, can you please confirm in response to this email that Georgia Tech authorizes and requests that Mr. Dagon  
provide those logs to the government as an employee of Georgia Tech? If you would like us to issue a subpoena for  
them specifically and will accept service, we can do so today.  
>  
> Jody/Mark, can you please let us know when Mr. Dagon can provide the logs to us or, alternatively, to Georgia Tech for  
production to us?  
>  
> We are hopeful that we can find a solution to this issue in the near term and avoid unnecessary legal process or  
disruptions.  
>  
> Thank you very much.  
>