

**Exhibit 16**

Mr. Ryan Milliron  
14579 Tupelo Drive  
West Olive, MI 49460

October 4, 2022

Chief FOIA Officer  
% Information Management Office  
Office of the Director of National Intelligence  
Washington, DC 20511

I am writing to appeal the response received to FOIA request DF-2022-00400 which stated:

I request any files in DNI's possession relating to attribution work done on the hack of the Democratic National Committee by the Russians in 2016 that originated with or was influenced by, Rodney Joffe, David Dagon, Manos Antonakakis, Angelos Keromytis, or Tejas Patel.

The Response

On September 8, 2022 I received the final response which stated that the Office of the Director of National Intelligence "can neither confirm nor deny the existence or nonexistence of request records response to your request."

This response cited exemptions b(1) and b(3) in its denial of my request.

Exemption b(1) exempts from disclosure information currently and properly classified, pursuant to an Executive Order;

Exemption b(3) exempts from disclosure information that another federal statute protects, provided that the other federal statute either requires that the matters be withheld, or establishes particular criteria for withholding or refers to particular types of matters to be withheld.

Neither exemption is appropriate in this instance. It is already common knowledge that David Dagon and Manos Antonakakis had a role in investigating the hack of the Democratic National Committee (DNC).<sup>1</sup> Therefore, such information cannot be held to be classified.<sup>2</sup>

Pursuant to Sec. 1.7 of Executive Order 13526, information cannot be classified to:

- Conceal violations of law, inefficiency, or administrative error;
- Prevent embarrassment to a person, organization, or agency;

---

<sup>1</sup> Margot Cleveland, *The Federalist* -

<https://thefederalist.com/2022/04/22/docs-spygate-researchers-did-work-for-former-special-counsel-robert-mueller/>

<sup>2</sup> See attached exhibits from Open Records Requests I personally obtained noting "attribution" work.

- Prevent or delay the release of information that does not require protection in the interest of the national security.

Withholding the information from the Request violates all three of these bullet points.

Three of these individuals conspired to compile and disseminate fabricated data alleging a communications channel between Trump and Putin. The other two have been implicated as well.

It is in the public interest to see the full extent of their work on the hack of the DNC. There is no articulable or defensible position that these are sources deemed worthy of protection from scrutiny. The national defense exemptions do not come into play at all, and cannot, solely to hide embarrassment and possible crimes of government officials.

For these reasons, I ask that my FOIA be processed fully and without further delay.

Sincerely,

Ryan Milliron



>> 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.

>>  
>>

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

From: Jody R Westby <[westby@globalcyberlegal.com](mailto:westby@globalcyberlegal.com)>  
Sent: Saturday, July 24, 2021 11:48 PM  
To: Elizabeth Young <[EYoung@LAW.GA.GOV](mailto:EYoung@LAW.GA.GOV)>  
Cc: Mark Rasch <[REDACTED]>; Mark Rasch <[rasch@globalcyberlegal.com](mailto:rasch@globalcyberlegal.com)>  
Subject: Re: List of documents relevant to subpoena

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,  
Here is additional information from David that may be helpful in putting together GT's response to the subpoenas:

#### Chiron Data

There is a host in the Enhanced Attribution lab called [chiron.astrolavos.gatech.edu](http://chiron.astrolavos.gatech.edu) with a directory called:

`/data/whois_parsed`

This holds approximately 13TB of whois data obtained from a vendor, mostly in json.gz (compressed text) form. Uncompressed, the data might be around 130TB. Note: Not all this data would be relevant of course. However, it is very likely that many relevant domains are included in this data. One would have to write a program to search through this data.

There is an additional directory:

`/data/whois`

holding approximately 6TB of what appears to be the original (raw) whois data from a vendor.

Searches could be run for at least:

All Trump owned domains  
Alfa Bank  
Spectrum Health  
Domo.com

Data Transfer Files



The files documenting when GT received data from Neustar for the Enhanced Attribution contract.

I hope this is helpful. Please let me know if you have questions.

Kind regards,

Jody

Jody R Westby, Esq.

Managing Principal

Global Cyber Legal LLC

+1.202.255.2700

[westby@globalcyberlegal.com](mailto:westby@globalcyberlegal.com)

[www.globalcyberlegal.com](http://www.globalcyberlegal.com)

On Jul 23, 2021, at 3:30 PM, Jody R Westby <[westby@globalcyberlegal.com](mailto:westby@globalcyberlegal.com)> wrote:

Beth,

At our direction, David made a list of documents/data sources that he thought would be responsive to the subpoena. They are:

DARPA whitepapers

Whitepaper on DNC attack attribution

Analysis of attacks of EOP (Executive Office of the President) networks

Whitepaper for DOJ on APT-29 related hackers, crypto coin transactions, and analysis that includes Yota-related domains

"Mueller List" - list of domains and indicators related to APT-28

BLU Phones directory of files

Rhamnusia chat logs

We may have further information after we are able to speak to our client, but not sure when that will be at this point. Hope this is helpful to you.

Kind regards,

Jody

Jody R Westby, Esq.

Managing Principal

Global Cyber Legal LLC

+1.202.255.2700

[westby@globalcyberlegal.com](mailto:westby@globalcyberlegal.com)

[www.globalcyberlegal.com](http://www.globalcyberlegal.com)

From: Antonakakis, Manos <manos@gatech.edu>  
Sent on: Tuesday, June 16, 2020 1:24:04 PM  
To: McLaughlin, Steven W <swm@coe.gatech.edu>  
Subject: Re: Follow up from DOJ

Absolutely, Steve. I will make 5.30 work.

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

---

From: McLaughlin, Steven W <swm@coe.gatech.edu>  
Sent: Tuesday, June 16, 2020 8:14 AM  
To: Antonakakis, Manos  
Cc: McLaughlin, Steven W  
Subject: Re: Follow up from DOJ

Hi Manos  
Thanks - would be good to have a quick chat later today? Any chance 5:30p works for you?  
Thx  
Steve

\*\*\*\*\*

Steve McLaughlin  
Dean and Southern Company Chair  
College of Engineering  
Georgia Institute of Technology  
Atlanta, GA 30332

---

From: Antonakakis, Manos <manos@gatech.edu>  
Sent: Monday, June 15, 2020 1:46 PM  
To: Wasch, Kate <kate.wasch@legal.gatech.edu>  
Cc: McLaughlin, Steven W <swm@coe.gatech.edu>; Abdallah, Chaouki T <ctabdallah@gatech.edu>  
Subject: Re: Follow up from DOJ

Hey Kate, thank you for your note.

I am very busy with EA for at least until the end of July. I was planning to take some time off after these major EA milestones ahead of us, and then I will be starting a new research project on 5G security with DARPA as the PI. This means I will have to handle contractual and other management issues around bootstrapping this new large DARPA research project. All these means that I will not be able to do potentially meaningful work (and this depends on what the actual ask from DoJ really is) until September for this investigator.

Now, neither member of my team nor me will talk to anyone \*until\* I get explicit direction from the Dean of COE and/or EVPR that GT wants my team to get involved in this investigation. Assuming we end up as GT helping out DoJ in this investigation, I would like to understand how GT (Steve and Chaouki) plans to protect me and my researchers when our attribution analysis become public and we have extreme people from either the far right (i.e., KKK) or the far left (i.e., Antifa) --- that do not like our findings for whatever reason --- come visiting us in our homes.

When I get answers to all these, then we can schedule a call with the DoJ investigator about what explicitly they want us to do. For that call, I would like someone from GT legal to be on the call, just in case the discussion goes down a path that could be potentially damaging for GT's reputation (i.e., the DoJ is borderline unethical or even illegal). It would not be fair for just me to be responsible for that.

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

---

From: Wasch, Kate <kate.wasch@legal.gatech.edu>  
Sent: Monday, June 15, 2020 1:13 PM  
To: Dagon, David S; Antonakakis, Manos  
Subject: Follow up from DOJ

Good afternoon, gentlemen. DARPA confirmed in a telephone call with us that you may speak to the DOJ and their investigator. Please let me know if you are willing to do so.

Kate Wasch  
Chief Counsel  
Employment & Litigation  
Office of Legal Affairs  
Georgia Institute of Technology  
Atlanta, GA 30332-0495  
(404)894-4812

Most communications to or from Georgia Tech employees are a public record and available to the public and the media upon request under Georgia's broad open records law. Therefore, this e-mail communication and any response may be subject to public disclosure.



**From:** Antonakakis, Manos<manos@gatech.edu>  
**Sent on:** Monday, July 26, 2021 1:20:48 PM  
**To:** Thrash, Sherryll D<sherryll.thrash@carnegie.gatech.edu>  
**Subject:** Re: FGJ Subpoena for Manos Antonakakis

Thank you Sherryll.

—  
Manos Antonakakis, Ph.D. | [manos@gatech.edu](mailto: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

---

**From:** "Thrash, Sherryll D" <sherryll.thrash@carnegie.gatech.edu>  
**Date:** Monday, July 26, 2021 at 8:19 AM  
**To:** "Antonakakis, Manos" <manos@gatech.edu>  
**Subject:** FW: FGJ Subpoena for Manos Antonakakis

Dear Manos Antonakakis:

This message is to acknowledge receipt of your email. I will be in touch soon to schedule a meeting.  
Kind regards,  
Sherryll

---

**SHERRYLL D. THRASH** Administrative Manager &  
Assistant to the VP & General Counsel  
**Georgia Institute of Technology**  
Office of the General Counsel  
221 Uncle Heinie Way | Lyman Hall, Suite 305  
Atlanta, GA 30332-0257  
☎ O: (404) 385.5673 | M: (470) 330.5127  
✉: [sherryll.thrash@carnegie.gatech.edu](mailto:sherryll.thrash@carnegie.gatech.edu)

---

**From:** Antonakakis, Manos <[manos@gatech.edu](mailto:manos@gatech.edu)>  
**Date:** Saturday, July 24, 2021 at 10:50 AM  
**To:** McLaughlin, Steven W <[swm@gatech.edu](mailto:swm@gatech.edu)>, Abdallah, Chaouki T <[ctabdallah@gatech.edu](mailto:ctabdallah@gatech.edu)>, Nie, Ling-Ling <[linglingnie@gatech.edu](mailto:linglingnie@gatech.edu)>  
**Subject:** Re: FGJ Subpoena for Manos Antonakakis

Hey Steve, Chaouki and Ling-Ling,  
Hope you are doing great.

I have not been bothering you about this because I have been told by Christian (who is an absolute Rock star!) that Ling-Ling (or someone in her team) has been communicating to you what is going on with this situation. This email is not about me explaining to you that I have done nothing wrong. I suspect that now that Christian has all the information he needs he can independently arrive at that conclusion and communicate what needs to be communicated to you.

This email is about the key question, "And now what?"

From where I stand, and for the first time in my life I felt that I am being investigated by law enforcement because of my ideas and the work I have done for the USG/DoD. For the first time since the moment I landed in Dulles international airport on October 1st of 2004, I had a serious discussion with my wife about moving back to Greece. Most importantly, however, I brought unnecessary attention from the DoJ in my working environment. This besides potentially hurting my reputation within GT (even if it is from an optics point of view) it also personally disappoints me greatly, because as a GT PhD student (2006-2012) and now as a faculty (2014-now) I always had as a goal to bring good news, recognition and success to GT --- and certainly not the attention of a special council.

If I make an attempt to come in your shoes, it would be absolutely reasonable for all of you to have questions about the risk that my research (and perhaps even myself) could bring to the Institute in the future. Therefore, when the dust settles I would like to have a discussion with all of you about the following two key open questions:

1. First and foremost, how do you feel about my actions now that GT legal has a plethora of my emails and after I spent countless hours explaining to everyone why I did what I did at the time I did it? If you think I did



something unethical (not necessarily illegal) I will work with GT to smoothly (see running projects, students, SOW deliverables, etc.) or otherwise transition out. You have my word on this.

2. Big data analysis and machine learning for attack attribution is the future. After all these events with this politically driven inquisition, I need to see if there is a place where I can keep working on this research space that I invented over the last 5 years through my work in EA. What I would like to know is how GT upper management and legal feels about my line of research after all these events? Is GT a place that would welcome more innovation in this space, or this is simply not your (read is as GT's) cup of tea anymore?

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](mailto:linglingnie@gatech.edu)>

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

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

**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

The San Antonio person was AFOSI.

> On Apr 24, 2018, at 20:13, Antonakakis, Manos <manos@gatech.edu> wrote:

>

> Cool.

>

> Chris, I would suggest we invite the following people:

> - The guys from Cyber Protection Brigade (Whalen, Daniel J CW2 USARMY CYBER PRO BDE (US) <daniel.j.whalen14.mil@mail.mil> and his team).

> - The guys from NSA at FG (Wilson, Ryan D CIV (US) <ryan.d.wilson38.civ@mail.mil>, Tran, T T CIV (US) <thaothanh.t.tran.civ@mail.mil> and their teams).

> - The guys from FM. I guess Michael can help you with the names or you can reach to Scott (scotttaylor31415@gmail.com) to get them directly.

>

> There was a gentleman in the HACCS meeting from an Air Base in San Antonio \*very interested\* in our APT28/Sofacy analysis. He asked me if he can attend the next EA PI meeting, and I said sure. He had no card on him and I am do not remember his name. If someone can identify who this tall, skinny guy was, we should invite him as well.

>

> Michael, am I forgetting anyone?

>

> -

> Manos Antonakakis | manos@gatech.edu

> Georgia Institute of Technology

> FF7D 4FDF 9115 8077 92D2 5B59 5120 5E89 BE1B 3668

>