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File 94872

January 12, 2023

VIA EMAIL

(sbatkin@fraserlitigation.com)

Mr. Seva Batkin
Fraser Litigation Group
1100 - 570 Granville Street
Vancouver, BC V6C 3P1

Dear Mr. Batkin:

Re: Citizen Lab

We are litigation counsel to the Citizen Lab, and we are in receipt of your email dated January 10, 2023, directed to Dr. Ron Deibert, Director of the Citizen Lab at the University of Toronto. Please direct further correspondence on this matter to my attention.

Your email raises a number of issues that I would like to clarify.

First, you say that Prof. Deibert's January 4, 2023 letter (the "January 4 Letter") was not received by PortaOne, and that there is no indication of how it was sent. I note that the January 4 Letter includes PortaOne's public "contact" email address. Attached to this letter is the email used by Prof. Deibert to send your client the January 4 Letter.

Second, your email states that PortaOne denies having done business in Iran. However, PortaOne's publicly available website did, up until yesterday, identify 2-3 installations of its software in Iran. We observe that the current version of the PortaOne website no longer includes Iran as a country with such installations. Please ensure that all communications related to this change are preserved.

Third, we attach one of the emails involving PortaOne, which was reviewed by the Citizen Lab in preparing its report. In order to verify the authenticity of the emails from The Intercept, the Citizen Lab conducted a scan intended to assess the validity and integrity of the email evidence by verifying the following:

1. The message domain key (DKIM) was valid, thus ensuring the cryptographic authentication of the message sender address and subject fields were not manipulated during transit;
2. There is no malicious content in the email;
3. The hops from sender and receiver servers are valid and registered; and
4. Header values are valid and consistent (no anomalies).

PALIARE ROLAND ROSENBERG ROTHSTEIN LLP

155 WELLINGTON STREET WEST 35TH FLOOR TORONTO ONTARIO M5V 3H1 T 416.646.4300

We would be grateful if you could confirm that the PortaOne email address in the attached email is valid, and that you are retaining all correspondence related to that address.

In any event, we see now that PortaOne's public statement from yesterday has evolved from the position set out in your email to Prof. Deibert. That statement will be included in the published version of Citizen Lab's report.

Yours very truly,
PALIARE ROLAND ROSENBERG ROTHSTEIN LLP

A handwritten signature in black ink, appearing to read 'Ren Bucholz', with a horizontal line extending to the right.

Ren Bucholz
RB:SH

Encls.

Doc 4661216 v1

From: [Ronald Deibert](#)
Sent: Wednesday, January 4, 2023 3:08 PM
To: contact@portaone.com
Cc: [Siena Anstis](#)
Subject: Citizen Lab Report Questions
Attachments: PortaOne_January 4, 2023.pdf

To whom it may concern

The Citizen Lab is a public interest, evidence-based research group at the University of Toronto that I direct.

Please find attached details on a report we intend to publish about your company, with accompanying questions.

We appreciate your timely response.

All the best

Ron

Ronald Deibert, O.C., O.Ont
Director, the Citizen Lab, Professor, Political Science
Munk School of Global Affairs and Public Policy
University of Toronto
+1 (416) 946-8916
<https://deibert.citizenlab.ca/>
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r.deibert@utoronto.ca

PortaOne, Inc.
A113 – 2099 Lougheed Hwy,
Port Coquitlam, BC V3B 1A8 Canada
Email: contact@portaone.com

January 4, 2023

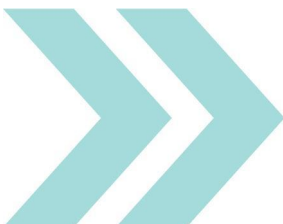
To Whom It May Concern:

The Citizen Lab, an interdisciplinary laboratory based at the Munk School of Global Affairs & Public Policy, University of Toronto, is currently researching the role of your company's products and services in a lawful intercept system used by the Iranian authorities.

We reviewed a series of internal documents and communications providing details on Iran's mobile infrastructure, subscriber management operations and services, and integration with mobile networks. Some of this communication included representatives of the Communications Regulatory Authority of Iran (CRA) and foreign service providers.

The materials describe a "Legal Intercept" system operated by the CRA which allows the agency to undertake detailed surveillance and information controls over all mobile subscribers in Iran. The documents also describe in detail how several non-Iranian based firms, including yours, provide commercial services to support Iran's Legal Intercept requirements of mobile surveillance, service control, and account management.

We would appreciate a response from your company to the following questions by **January 11, 2023 at 11:59PM EST:**



At Trinity College
1 Devonshire Place
Toronto, ON
Canada M5S 3K7
T: 416.946.8900 F: 416.946.8915

At the Observatory
315 Bloor Street West
Toronto, ON
Canada M5S 0A7
T: 416.946.8929 F: 416.946.8877

munkschool.utoronto.ca

At the Canadiana Gallery
14 Queen's Park Crescent West
Toronto, ON
Canada M5S 3K9
T: 416.978.5120 F: 416.978.5079

- Does your company require any export licenses prior to exporting technology or technical assistance or services that fall within the scope of dual-use export regulations? If so, have these licenses been obtained?
- Are your company's exports subject to any sanctions regimes related to Iran? If so, how have you ensured compliance with these regimes in the sale of technology or technical assistance or services to Iranian authorities or companies?
- How does your company ensure compliance with the corporate responsibility to respect human rights as set out in the *United Nations Guiding Principles on Business and Human Rights*?

We plan to publish a report reflecting our research. Provided we receive your response by the above mentioned date and time, we will publish your response in full along with our research report.

Sincerely,



Professor Ronald J. Deibert
Director of the Citizen Lab
Munk School of Global Affairs & Public Policy
University of Toronto



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1 Devonshire Place
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14 Queen's Park Crescent West
Toronto, ON
Canada M5S 3K9
T: 416.978.5120 F: 416.978.5079

From: mchackal@portaone.com
Sent: Wednesday, June 26, 2019 6:53 AM
To: farzad.d@telinsol.co.uk; mohammad.h@ariantel.ir;
nima@telinsol.co.uk; ziba@telinsol.co.uk
Cc: a.ghahri@telinsol.co.uk; baghdadi.it@gmail.com;
shahrokh.shahbazi@yahoo.com; sobhan@telinsol.co.uk;
zmr.dri@gmail.com
Subject: [PortaOne #637777] PortaOne Converged BSS-OSS and Billing for
Telinsol in UK

Dear Farzad,
I hope all is well with you.

PORTAONE PROFESSIONAL SERVICES

Please see the following videos about the importance of PortaOne Professional Services from the PortaOne Customer Conference which was held on 1st June 2019.

- 1- Alexander Zalugovskiy, Project Manager at PortaOne, about Professional Services - <https://youtu.be/SVsRe1O-QWM>
- 2- Jamien Zimmerman, CEO at TravelSIM MVNO, about MVNO launch with Professional Services - <https://youtu.be/F2U5s8looTw>
- 3- Oleg Shevtsov, Senior Project Manager at PortaOne, about Integrations with Mobile Networks: <https://youtu.be/mFnAA7FizGQ>
- 4- Daniel Fuchs, CTO at Datora MVNE/O in Brazil, about opportunities with PortaOne licences: <https://youtu.be/Zbups8PFcKo>
- 5- Andriy Zhylenko, CTO at PortaOne, about PortaOne roadmap: <https://youtu.be/xbxc5s7xrho>

CONTRACT

We cannot sell you the licenses without the Professional Services because of the payment terms you are requesting.

PortaOne can only accept your payment terms: 50% in advance, 25% after installation and 25% 1 year after installation ON CONDITION that we provide the professional services to ensure the project is delivered on time and that PortaOne gets paid.

If you wish to buy the licences without Professional Services, we cannot accept your payment terms because the project timing will be out of our control and may be delayed indefinitely and payments to PortaOne will also be delayed.

I am on standby to reach a final agreement with you and sign the contract.
Let me know how you'd like to proceed.

Thanks and best regards
Michael

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Michael Chackal
Business Development Director - PortaOne Inc.
Barcelona, Spain.
T: +1 866 747 8647 - Ext:7030

M: +1 613 495 0292