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January 11, 2023

**DELIVERED BY E-MAIL  
(R.DEIBERT@UTORONTO.CA)**

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

Dear Professor Deibert,

**Re: Telinsol Ltd.**

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We have been contacted by Telinsol Ltd. ("Telinsol") in connection with your letter of January 4, 2023.

We are in the process of finalizing our retainer but, given the deadline set in your letter, we thought it best to write to you forthwith to set out Telinsol's position.

Telinsol Ltd. is a UK-based company established in 2015, and is globally active in various areas of IT and audio visual and technology-related services. Due to the nature of Telinsol's business working with reputable global players, its legal and compliance team always makes sure that Telinsol fully abides by applicable laws and regulations.

Telinsol fully supports Iranians' aspirations for democracy, freedom, and human rights -- and particularly the rights of the Iranian people to freedom of expression and digital privacy. Telinsol also strongly condemns the brutal crackdown of the murderous Islamic regime against Iranian protestors.


In response to your letter, Telinsol flatly denies the allegation that it has been involved in activities that would in any way help digital espionage against Iranian citizens. In particular, the suggestion in your letter that Telinsol provides commercial services to support Iran's Legal Intercept requirements of mobile surveillance, service control and account management is entirely false and any publication of such an allegation would cause irreparable harm to Telinsol, as well as to the reputation of its past and present clients.

In the result, Telinsol strongly urges Citizen Lab to eliminate any reference to Telinsol in its report. While Telinsol greatly appreciates the impactful work done at the Citizen Lab and fully supports your goal of preventing digital espionage against civil society, Telinsol will not hesitate to avail itself of all available legal remedies in response to a defamatory publication by Citizen Lab.



Sincerely,  
**DLA Piper (Canada) LLP**

Per:

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Tudor Carsten  
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