

March 15, 2025

To Whom It May Concern:

The Citizen Lab is an interdisciplinary laboratory based at the Munk School of Global Affairs, University of Toronto, researching information controls and their impact on human rights.

We intend to publish a new report on spyware targeting with Paragon Solutions' Graphite spyware against some civil society members.

We would like to offer Paragon Solutions an opportunity to comment on our upcoming findings, which are summarized below:

- Paragon Solutions was founded in Israel in 2019 and sells a spyware called Graphite.
- We mapped a network of command and control infrastructure and customer endpoints. We have attributed the network to Paragon's Graphite spyware tool.
- Our infrastructure mapping identified suspected Paragon operators in Australia, Canada, Cyprus, Denmark, Israel, and Singapore.
- Our investigation surfaced potential links between Paragon Solutions and the Canadian Ontario Provincial Police.
- We forensically analyzed multiple Android devices belonging to Paragon targets in civil society that were notified by WhatsApp. We found clear indications that Graphite spyware had been loaded into WhatsApp, as well as other apps on their devices.
- We analyzed the iPhone of an individual notified by Apple about a mercenary spyware attack. We believe this attempt might also have been undertaken with Paragon spyware.

We undertake to publish any response from Paragon Solutions in full, along with the report itself, on our website, provided we receive Paragon Solutions' response before **Monday, 12 pm EST**.

Sincerely,



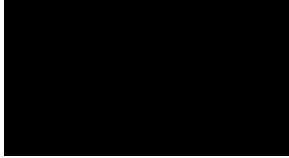
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All the best



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