



February 6, 2024

Secretary Gina Raimondo
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Dear Secretary Raimondo,

Re: Urgent Request to Maintain Sanctions Against NSO Group

I am writing on behalf of DAWN to request the continued enforcement of sanctions against the NSO Group. This appeal is grounded on new revelations indicating NSO Group's ongoing involvement in enabling oppressive foreign governments to deploy its Pegasus spyware against dissidents, journalists, and legal professionals, including American citizens such as Adam Coogle, a prominent figure at Human Rights Watch.

Recent investigations by Citizen Lab and Access Now have unveiled disturbing new instances of Pegasus spyware being utilized in Jordan to surveil at least 35 individuals, including journalists, activists, and human rights attorneys, spanning from 2019 to 2023. It is particularly concerning that these abuses have persisted post the U.S. Department of Commerce's November 2021 sanctioning of NSO Group for its role in developing and supplying spyware that foreign governments used to target government officials, journalists, activists, and others, leading to transnational repression

Despite the sanctions and ensuing leadership changes within NSO Group, there is no evidence of substantial policy modifications have been implemented to prevent the misuse of its technologies especially taking into consideration the company's business model, which allows it significant oversight over the deployment of Pegasus software through continuous maintenance and support. This should have enabled NSO to prevent such misuse. Regrettably, the ongoing violations in Jordan serve as new evidence to the company's failure in this regard.

NSO's assurances of stronger oversight ring hollow. Its business model allows continuous control over Pegasus through fees and maintenance. If serious about change, NSO would have suspended clients like Jordan. Instead, abuse continues unabated.



The attempts by NSO Group to leverage the recent October 7 Hamas attack against Israel for their delisting from the Commerce Department's Entity List are deeply troubling. It is crucial to recognize that the foundational reasons for their initial sanctioning remain unaddressed and unresolved. Delisting NSO would not only undermine global human rights protection efforts but also diminish the integrity of U.S. foreign policy objectives and § 744.11 goal of protecting human rights throughout the world.

DAWN strongly urges the Department of Commerce to keep the NSO Group blacklisted in the "Entity List," affirming the United States' commitment to human rights and the rule of law. We appreciate your dedication to these principles and trust that you will take the necessary steps to prevent the further abuse of surveillance technology.

Sarah Leah Whitson
Executive Director
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