

February 3, 2022

Chris Gaertner, Partner
Elad Yoran, Partner
Pat Wilkison, Partner
Thomas Morgan Jr., Partner
Integrity Partners & Associates, LLC

Ken Moelis, Chairman and CEO
Moelis & Company

Dear Integrity Partners & Associates, LLC and Moelis & Company,

It has come to our attention that Integrity Partners & Associates, LLC (Integrity Partners) is in negotiations to purchase notorious spyware purveyor, NSO Group, and Moelis & Company played a role in facilitating the deal. According to [reporting](#) by *Haaretz*, “negotiations with Integrity are in their advanced stages.”

We call on Integrity Partners to stop the acquisition immediately and for Moelis & Company to stop identifying potential investors for NSO Group.

Access Now is a global civil society organization committed to defending and extending the human rights of users at risk. As the use of invasive spyware proliferates, placing the work and lives of activists and journalists at risk, we are working diligently to combat these dangerous surveillance technologies.

NSO Group has been in the international spotlight for months for their facilitation of human rights abuses around the world, from [Palestine](#) to [El Salvador](#) to [Poland](#). These ongoing revelations have led to the U.S. government and other stakeholders taking a number of actions against the company:

- The U.S. Department of Commerce [added NSO Group to the Entity List](#) for engaging in activities contrary to the national security or foreign policy interests of the United States;
- Apple [launched its own lawsuit against NSO](#) for abusing their services and servers to perpetrate attacks on Apple’s users and data stored on users’ devices in violation of U.S. federal and California state law;
- The U.S. 9th Circuit Court moved [the WhatsApp lawsuit against NSO forward](#), rejecting NSO’s claims for immunity, paving the way for legal consequences;

- A group of U.S. lawmakers [called for targeted sanctions](#) against NSO and other spyware firms for facilitating the “disappearance, torture, and murder of human rights activists and journalists”;
- At the flagship [Summit for Democracy](#), the Biden administration announced the [Export Controls and Human Rights Initiative](#) — a long-overdue plan for the U.S. and allies to develop human rights-based export controls on the sale of surveillance and hacking tools to regimes accused of abuse; and
- The U.S. Congress [passed legislation](#) that directs the U.S. State Department to develop a list of spyware purveyors with whom the Department should not do business because of poor human rights records that fit the definition of charges levied at NSO Group by the Commerce Department.

Not only are there ethical and human rights considerations if you move forward with the purchase, there are also financial implications — any firm that invests in NSO Group will likely suffer huge [losses](#) and [reputational damage](#). By investing in NSO Group, you will be rewarding the company’s reckless behavior that has rightly led NSO to the brink of financial ruin.

We urge you to abandon the negotiations immediately and to review your due diligence policies and practices to prevent future investments in companies that violate human rights.

Sincerely,

Jennifer Brody
U.S. Advocacy Manager, Access Now

Peter Micek
General Counsel, Access Now

Natalia Krapiva
Tech Legal Counsel, Access Now

Hinako Sugiyama
Legal Fellow, Access Now