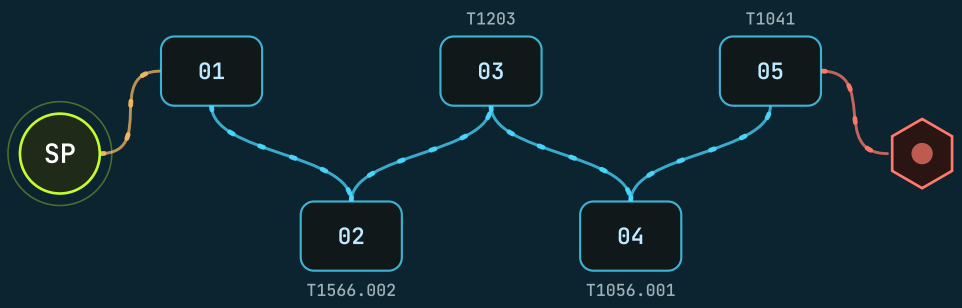


INTELLIGENCE BRIEF

# Commercial Spyware Keeps Selling Through Sanctions, Verdicts and Buyouts

Sanctions, court orders and a US buyout have not ended mercenary spyware. Google tied more 2025 zero-days to spyware vendors than to traditional state espionage groups. Patch fast; treat Apple alerts as incidents.

EDITION
Fall/Winter 2026/2027 Edition
SP-03 · Spyware vendor

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# 01 At a Glance

## STATUS

**ONGOING RISK**

Vendors keep operating despite sanctions, court orders and ownership changes, and Google attributed more 2025 zero-days to commercial surveillance vendors than to traditional state-sponsored espionage groups. [12]

## HEADLINE NUMBERS

**90**
zero-days exploited in the wild in 2025 [12]

**110**
countries in Apple's August 2026 spyware alert wave [28]

**561**
spyware entities in 46 countries, 1992 to 2024 [20]

**$475.7M**
Cellebrite 2025 revenue, up 19 percent [19]

## KEY FACTS

**MARKET**
561 entities in 46 countries (1992 to 2024); US investors now the largest group [20]

**EXPLOITS**
90 zero-days exploited in 2025; commercial vendors ahead of traditional state espionage groups for the first time [12]

**DELIVERY**
One-time links in encrypted messaging apps; Intellexa also redirects some targets through malicious ads [10]

**LEGAL PRESSURE**
NSO enjoined, Ninth Circuit appeal pending; Meta moved for contempt on June 8, 2026 [4]

**SANCTIONS**
Three of seven sanctioned Intellexa individuals delisted Dec 30, 2025; NSO and Candiru remain on the Entity List [34]

**TARGETS**
Apple sent threat notifications to users in 110 countries in a wave reported Aug 13, 2026 [27]

## 02 What Happened

The original edition described an industry under legal pressure yet still growing. Ten months on, both trends held. NSO Group is under US investor control and bound by a permanent WhatsApp injunction, three Intellexa-linked individuals were delisted weeks after Google and Amnesty documented Predator operations continuing, and ICE's Paragon contract closed out while Paragon's chief executive said the company has no way to know whether customers misuse its software.

- Google Threat Intelligence Group counted 90 zero-days exploited in the wild in 2025 and, for the first time since it began tracking, attributed more zero-days to commercial surveillance vendors than to traditional state-sponsored espionage groups.
- A federal court entered the WhatsApp permanent injunction against NSO Group on November 12, 2025, with a final judgment of $4,447,190 after cutting the $167,254,000 punitive award to $4,002,471. The district court and the Ninth Circuit both denied stays, NSO's appeal is pending, and Meta moved for contempt on June 8, 2026.
- Treasury removed three Intellexa-linked individuals from the SDN list on December 30, 2025. Five senators wrote on February 13, 2026 that three of the seven designated individuals were delisted without the bipartisan briefing that committee staff had requested.
- NPR reported in May 2026 that DHS said ICE has no relationship with Paragon or its acquirer. A procurement notice shows the contract closed out on January 20 (NPR gives no year), and ICE's acting director wrote in an April 1 letter that use of the tool complied with the 2023 executive order.
- Apple told TechCrunch it sent a new batch of mercenary spyware threat notifications to users targeted in 110 countries, and says it has now notified users in over 150 countries in total. Apple notifies by lock screen push as well as by email.
- The FCC voted in November 2025 to rescind the January 2025 CALEA declaratory ruling and withdrew the rulemaking that accompanied it, with Commissioner Gomez dissenting.

# 03 How It Works

## 01 A government buys access

A government customer buys the platform, and Intellexa keeps supplying exploits. Google found Intellexa increasingly buying steps of its exploit chains from external entities.

## 02 Delivery by link or by ad

MITRE ATT&CK T1566.002

Google says the primary route is one-time links sent over end-to-end encrypted messaging apps. Since early 2025 it has also seen Intellexa use malicious ads on third-party platforms to fingerprint users and redirect targets to exploit servers for a few customers. Leaked documents describe a separate ad-only system called Aladdin; Amnesty believes it supported active deployments in 2024, but Recorded Future knew of no in-the-wild use as of December 3, 2025.

## 03 Browser and kernel exploit chain

MITRE ATT&CK T1203

A captured iOS chain combined a Safari remote code execution bug with two kernel bugs to break out of the browser sandbox and run the payload with system privileges. Of roughly 70 zero-days that Google's Threat Analysis Group discovered and documented since 2021, 15 are Intellexa's.

## 04 Implant checks its surroundings

MITRE ATT&CK T1056.001

Google's analysis of the PREYHUNTER payload found modules that record calls, log keystrokes, capture camera images and hide notifications. A watcher module ends the infection if it finds developer mode, certain mobile security apps or a US or Israeli (IL) locale.

## 05 Data flows to the customer system

MITRE ATT&CK T1041

Collected data is viewed and stored in a Predator dashboard. A leaked mid-2023 training video shows Intellexa staff connecting to deployed customer systems over TeamViewer, which Amnesty says raises questions about customer oversight and how well live surveillance data is compartmentalized.

## 04 Who Is at Risk

Mercenary spyware is bought by governments and aimed at specific people. The cost lands on the organizations those people work for, because one infected phone exposes mail, messages and credentials for everyone around it.

- Government officials, journalists and policy experts: Treasury's March 5, 2024 release says Predator was used to target Americans, including U.S. government officials, journalists, and policy experts. Five US senators later wrote that foreign actors deployed it against officials including members of Congress, citing NBC News.
- Journalists and civil society activists: Italy's parliamentary oversight committee acknowledged in June 2025 that Italian intelligence services used Graphite against civil society activists, and Amnesty documented a Predator attempt against a Balochistan human rights lawyer in summer 2025.
- Staff who travel to or deal with countries where Google sent government-backed attack warnings tied to Intellexa customers, including Pakistan, Kazakhstan, Angola, Egypt, Uzbekistan, Saudi Arabia and Tajikistan.
- Telecommunications carriers and their customers, after the FCC rescinded its January 2025 CALEA security ruling in November 2025.
- Public agencies evaluating surveillance or forensic vendors, which carry sanctions, procurement and reputational exposure.

**Sectors in scope:** government officials and legislators, journalists and civil society, lawyers and human rights defenders, telecommunications carriers, policy and research organizations, executives in regulated industries.

## 05 What Changed Since the Last Edition

EACH CHANGE WITH ITS SOURCE

01 The WhatsApp injunction against NSO Group was entered on November 12, 2025, after Judge Hamilton cut the $167,254,000 punitive award to $4,002,471 on October 17. It covers only the WhatsApp platform: it bars NSO and anyone acting with it from building or using technology that interacts with WhatsApp, collecting its data, reverse engineering its code or creating accounts, orders deletion of related code and data, and excludes foreign sovereign customers and outside counsel. The district court denied a stay on December 19, 2025, the Ninth Circuit denied one on January 28, 2026, and NSO's appeal is pending.

SOURCE 33

02 NSO is now controlled by a US investor group, with former ambassador David Friedman as executive chairman after CEO Yaron Shohat and co-founder Omri Lavie left. TechCrunch reported in January 2026 that NSO is campaigning for removal from the Commerce Entity List, where the Consolidated Screening List still showed it on October 14, 2026, and that critics faulted its transparency report for omitting how many customers were rejected, investigated, suspended or terminated.

SOURCE 2

03 Treasury delisted Sara Hamou, Andrea Gambazzi and Merom Harpaz on December 30, 2025 under the CYBER2 program. A US official told CyberScoop each had demonstrated measures to separate from Intellexa and that the removal followed a petition for reconsideration. Senators Warren, Shaheen, Kim, Schiff and Bennet wrote on February 13, 2026 that Treasury gave committee staff no briefing, citing Google's December 3, 2025 finding that Intellexa adapted and continues selling and Amnesty's December 4, 2025 leak analysis.

SOURCE 9

04 ICE's Paragon contract was reactivated in August 2025 and a federal procurement notice says it closed out on January 20 (NPR gives no year). DHS told NPR in May 2026 that ICE has no relationship with Paragon or its acquirer and declined to say whether ICE keeps access through a third party. In an interview summarized by Citizen Lab on October 8, 2026, Paragon's CEO told WIRED the company has no way to know whether customers misuse its software and has no kill switch.

SOURCE 13

05 Google's March 5, 2026 review counted 90 exploited zero-days in 2025 (2024 now counted at 78), an all-time high of 43 or 48 percent against enterprise technologies, 15 on mobile operating systems versus 9 in 2024, and for the first time more zero-days attributed to commercial surveillance vendors than to traditional state-sponsored espionage groups.

SOURCE 12

06 Apple sent a new batch of threat notifications to users targeted in 110 countries, reported August 13, 2026, and now also pushes the alert to the iPhone lock screen. Citizen Lab said on August 20, 2026 that the scale and geographic diversity of public posts about the alerts was unprecedented and that there is a huge notification iceberg the public will never learn about.

SOURCE 27

07 The FCC voted in November 2025 to rescind the January 2025 CALEA declaratory ruling and withdraw the proposed rulemaking that accompanied it, calling the ruling unlawful and ineffective and saying carriers had taken important steps to strengthen cybersecurity. Commissioner Gomez was the only vote against.

SOURCE 21

08 Accountability came through courts rather than treaties: a Greek court convicted four people tied to Intellexa on February 26, 2026, which OCCRP called the first convictions in the Greek commercial spyware investigation, and the UK Supreme Court held in August 2026 that Bahrain is not immune from claims by two dissidents who allege it hacked them with FinSpy (Citizen Lab, September 2, 2026).

SOURCE 41

## 06 What to Do Now

IN PRIORITY ORDER, HIGHEST IMPACT FIRST

01 DO FIRST **Patch phones, browsers and messaging apps within days of release and enforce minimum OS versions through MDM.**

Google's 2025 zero-day review advises applying patches as soon as they become available; a patched device breaks the exploit chains already documented.

02 **Enable Lockdown Mode on iPhones and advanced protection on Android for executives, counsel, journalists and anyone who deals with high-risk countries.**

Apple told TechCrunch it has yet to see a case where a device was hacked while Lockdown Mode was enabled.

03 **Treat an Apple or Google threat notification as a security incident: isolate the device, reset credentials and sessions, and get a forensic review.**

A notification may not mean the device was hacked, but it means Apple suspects the person was targeted; Apple sent a new batch to users in 110 countries in August 2026.

04 **Run sanctions and ownership checks on any surveillance, forensic or intrusion vendor before purchase, and re-check annually.**

Delistings, ownership changes and restructurings affected NSO, Intellexa, Candiru and Paragon within the past two years.

05 **Do not assume carrier networks meet the January 2025 CALEA security requirements; keep sensitive calls and messages on end-to-end encrypted apps with disappearing messages.**

The FCC rescinded that ruling in November 2025, so the obligations it created no longer apply.

06 **Give staff a reporting path and a stand-in device plan for suspected targeting, and brief executives before travel to higher-risk jurisdictions.**

Targeting follows people and their contacts; the organizations around them absorb the damage.

**07** **Monitor mail and identity logs for sign-ins from a newly compromised phone, and require phishing-resistant MFA on executive accounts.**

Google documented a keylogger in Intellexa's payload, so passwords and codes can be exposed; identity controls limit what the attacker can do next. Z7's 24/7 SOC and Microsoft 365 posture review cover this layer.

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NEXT STEP

# What does this mean for your security?

Bring your questions about Commercial spyware industry, your environment and the controls you rely on. Talk through the most useful next step with Z7 Solutions LLC.

### 01 / Exposure

Bring one question about how this threat could affect your environment.

### 02 / Priorities

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