

169. The Black Cube Campaign, carried out by, for or at the direction of the Counterclaim Defendants, also constitutes actionable wrongs against the targets of those activities, the identities of which are known to the Counterclaim Defendants.

Among other things:

- (a) Operatives of Black Cube intentionally and fraudulently induced a number of the targets of the Counterclaim Defendants to invest time and money, and even to fly to London, England, in pursuit of employment or investment opportunities that never existed. Operatives of Black Cube intentionally made false representations to the targets with the purpose

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- 79 -

and effect of causing them to rely on those representations, meet with Black Cube operatives, and disclose to them West Face's confidential and/or privileged information;

- (b) Operatives of Black Cube induced the targets to breach duties of confidence owed to West Face pursuant to employment contracts and at law by offering them lucrative employment or investment opportunities