

Exhibit A
to Defendants' Notice of
Removal

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

OMAR ABDULAZIZ,

Plaintiff,

-against-

McKINSEY & COMPANY, INC.,
McKINSEY & COMPANY, INC. UNITED
STATES, McKINSEY & COMPANY, INC.
INTERNATIONAL, DOES 1-100 and XYZ
Corps 1-100,

Defendants.

INDEX NO.:

COMPLAINT

Plaintiff Omar Abdulaziz, for his complaint against defendants, alleges as follows.

THE PARTIES

1. Plaintiff Omar Abdulaziz is a political dissident from the Kingdom of Saudi Arabia (“KSA”) who now resides in Montreal, Quebec and has been granted political asylum by Canada because he faces persecution were he to return to KSA.
2. Defendant McKinsey & Company, Inc. is an international consulting firm established under the laws of New York.
3. Defendant McKinsey & Company, Inc. United States is an indirect, wholly owned subsidiary of McKinsey & Company, Inc. established under the laws of Delaware.
4. Defendant McKinsey & Company, Inc. International is an indirect, wholly owned subsidiary of McKinsey & Company, Inc. established under the laws of Washington.
5. Upon information and belief, and based on statements made in legal proceedings, the three McKinsey defendants identified herein (collectively, “McKinsey”) have, at all relevant times, acted in concert with each other and as agents of each other. As such, each McKinsey defendant is jointly and severally liable with the other McKinsey defendants for the acts alleged in this complaint.

6. The McKinsey defendants each maintain their principal executive office at 711 Third Avenue, 4th Floor, New York, New York.

7. McKinsey considers itself the world's preeminent consulting firm. On its verified¹ Twitter profile, McKinsey describes itself as follows: "Since 1926, the trusted advisor to the world's leading businesses, governments & institutions. More than 130+ offices in 65+ countries."

8. In or around December 2016, McKinsey prepared a report in the form of a PowerPoint presentation that identified the three most influential dissidents using Twitter to criticize Crown Prince Mohammad Bin Salman's (hereinafter "MBS")² austerity plan (hereinafter the "McKinsey Report"). Plaintiff was one of the three individuals McKinsey identified in the McKinsey Report. On information and belief, McKinsey either furnished the McKinsey Report to MBS and/or his agents and/or McKinsey allowed MBS and/or his agents to gain access to the McKinsey Report.

9. The true identity of each individual defendant denominated as a "Doe" is unknown to Plaintiff at this time, so said defendants are sued in this capacity. Each of these Doe defendants are partners, employees, representatives or agents of McKinsey and played a role in identifying Plaintiff as an influential dissident that KSA wished to silence. As each such defendant becomes known to Plaintiff, he will seek leave to amend this complaint to set forth that individual defendant's true identity.

¹ According to Twitter's website, a verified badge "lets people know that an account of public interest is authentic." Available at <https://help.twitter.com/en/managing-your-account/about-twitter-verified-accounts>.

² MBS is neither the head of the KSA state or KSA's government. However, he has been the de facto ruler of KSA for several years.

10. The true identity of each business entity defendant denominated as an “XYZ Corp.” is unknown to Plaintiff at this time, so said defendants are sued in this capacity. Each of these XYZ defendants are subsidiaries, divisions, or other forms of business entities owned or controlled by McKinsey and each played a role in identifying Plaintiff as an influential dissident that KSA wished to silence. As each such business entity defendant becomes known to Plaintiff, he will seek leave to amend this complaint to set forth that defendant’s true identity.

JURISDICTION AND VENUE

11. This Court has personal jurisdiction over McKinsey under CPLR §503 because McKinsey has systematically and continuously conducted business in New York and CPLR §302(a)(1) because McKinsey has, at all relevant times, transacted business in New York and the claims for relief arise out of those transactions.

12. Venue is proper in this Court under CPLR §503 because McKinsey is licensed to do business in New York and its principal place of business is in Manhattan.

FACTUAL ALLEGATIONS

13. In 2009, Plaintiff moved from KSA to Canada to attend university. While he was a student in Montreal, Plaintiff began using Twitter and other social media platforms to publish political commentary concerning KSA. Frequent subjects of Plaintiff’s criticism are the way the KSA regime ran the country, the rampant human rights violations KSA would commit, the royal family, corruption and KSA’s misguided foreign policy.

14. Plaintiff’s criticism has always focused heavily on the widespread human rights violations in KSA and KSA’s disregard for the rights and freedoms of Saudi citizens.

15. KSA has one of the worst human rights records in the world and this was common knowledge well before McKinsey prepared and furnished the McKinsey Report to

MBS and/or his agents and/or allowed MBS and/or his agents to gain access to the McKinsey Report. The State Department's 2014 Human Rights Report on Saudi Arabia summarized the situation:

“[H]uman rights problems reported included abuses of detainees; overcrowding in prisons and detention centers; investigating, detaining, prosecuting, and sentencing lawyers, human rights activists, and antigovernment reformists; holding political prisoners; denial of due process; arbitrary arrest and detention; and arbitrary interference with privacy, home, and correspondence. Violence against women, trafficking in persons, and discrimination based on gender, religion, sect, race, and ethnicity were common. Lack of government transparency and access made it difficult to assess the magnitude of many reported human rights problems.”
“The government reportedly arrested and detained multiple persons during the year, refusing for extended periods in some cases to acknowledge the detention or to provide information about an individual's whereabouts.”

16. The human rights situation in KSA has not improved since the State Department issued its report.

17. KSA remains notorious for suppressing critical political speech and sentencing numerous writers and dissidents to death or long prison terms without due process and application of legal norms that are applied by the legal systems of civilized countries. Since at least December of 2015, many notable, nonviolent dissidents have been kidnapped from foreign countries and forcibly returned to KSA. Once back in the kingdom, the dissidents are taken into custody by government forces or agents and, frequently, never heard from again.

18. The 2016 Human Rights Report from the U.S. State Department states that judges within KSA were implicitly instructed to issue harsh sentences against human rights activists, reformers, journalists, and dissidents, even those not engaged in violent activities.

19. KSA is well known for employing a technique known as “torture by proxy” whereby KSA targets Saudi-residing friends and family members of a dissident or political

opponent who lives outside of Saudi Arabia and is therefore out of the usual reach of KSA security forces.

20. In January 2016, Amnesty International reported that the sister of jailed dissident and blogger, Raif Badawi (who had taken refuge in Canada), was imprisoned.

21. Mr. Badawi remains in prison and has been sentenced to flogging – 1,000 lashes.

22. In June 2017, King Salman elevated MBS (one of his sons) to Crown Prince.

MBS is heir to the Saudi throne and the de facto ruler of KSA.

23. KSA, MBS and their agents and followers view political dissidents with disdain and consider them evil doers. As one Twitter employee³ recruited to help KSA quiet criticism on Twitter put it when accepting his assignment: “proactively and reactively we will delete evil, my brother.”

24. In October 2018, KSA lured Jamal Khashoggi,⁴ a KSA citizen and dissident, to the Saudi Consulate in Istanbul and sent a squad of assassins to murder Mr. Khashoggi while he was inside the consulate. Turkish investigators, the CIA and an independent investigative team assembled by the United Nations concluded that Mr. Khashoggi’s assassination was likely ordered by MBS.

³ This individual, Ahmad Abouammo, has been criminally charged for acting as an agent of a foreign government without notice to the attorney general; conspiracy to commit wire fraud and honest services fraud; wire fraud and honest services wire fraud and aiding and abetting; money laundering; and falsification of records to obstruct investigation in the United States District Court for the Northern District of California (San Francisco Venue) in the matter of United States of America v. Ahmad Abouammo, Ali Alzabarah and Ahmed Almutair (a/k/a Ahmed Aljbreen) (Case Number 3:19-cr-00621-EMC).

⁴ At the time of his death, Mr. Khashoggi was a Saudi journalist living in the United States and writing for the Washington Post. Mr. Khashoggi championed democracy, human rights, and anti-corruption efforts. He had been a fierce critic of KSA.

25. After torturing Mr. Khashoggi, the KSA assassin squad killed him and removed his limbs to make his body easier to conceal and transport out of the consulate. According to one investigator listening to recordings from within the consulate, one of the assassins asked the others about the mechanics of removing the body from the consulate. The doctor accompanying the assassin squad responded:

 Joints will be separated. It is not a problem... If we take plastic bags and cut [Khashoggi's body] into pieces, it will be finished. We will wrap each of them.

Mr. Khashoggi's remains have never been found.

26. Plaintiff was a close political ally and friend of Mr. Khashoggi. At the time of Mr. Khashoggi's assassination, the two men were working together on a range of political activities designed to educate and empower the citizens of KSA and draw worldwide attention to the human rights atrocities within the kingdom. The collaboration between Plaintiff and Mr. Khashoggi had the potential to build a broad political movement for democratic reform in Saudi Arabia.

27. Before the publication of the McKinsey Report, Plaintiff was simply one of thousands of individuals protesting corruption and human rights violations in KSA.

28. Plaintiff applied for asylum in Canada in 2013 because he was concerned that if he returned to KSA, he would be imprisoned, tortured or killed. Up until that point, the only actions Plaintiff knew that KSA had taken against him were cancelling his salary and scholarship for what Plaintiff believed was his political criticism of the kingdom. However, Plaintiff's family and friends living in KSA remained unharmed and free from harassment, arrest, imprisonment and persecution from KSA.

29. Upon information and belief, there were two events that drew heightened scrutiny of Plaintiff from KSA authorities and agents.

- a. First, KSA agents recruited Twitter employees in California to gather personal and confidential data on users of interest to KSA and MBS. Beginning on May 21, 2015, and continuing for approximately six months, one KSA Twitter recruit accessed the confidential user data and direct messages for nearly 6,000 Twitter users, including at least 33 names for which KSA security personnel had asked Twitter for “emergency disclosures.” This data breach is the subject of a legal action Plaintiff brought against Twitter in California and an FBI investigation. The US Attorney’s Office filed criminal charges against the “Twitter spies.”
- b. Second, in or about December 2016, McKinsey prepared the McKinsey Report which identified the three most influential social media critics of KSA and MBS. McKinsey collected and analyzed Twitter data from September and October 2016. The McKinsey Report was finalized in December 2016. A true and accurate copy of what Plaintiff believes is the McKinsey Report is attached hereto as Exhibit A.

30. Locating these three “Key people” identified in the McKinsey Report was not an easy task. More than one-half of KSA’s population are millennials, a generation well-versed in technology and social media. This is one of the reasons KSA has the highest number of active Twitter users in the Arab world.

31. According to the McKinsey Report, there are 316 million registered Twitter accounts in KSA and “Saudis produce over 500,000 tweets per day.” Report, p. 9. In the McKinsey Report, McKinsey boasts that to achieve its results it “closely analyzed data from

twitter feed.” Part of the McKinsey Report’s analysis identifies “Key people who lead online conversations in their field.” Report, p. 2.

32. The Report identified three men as “Major influencers in Saudi driving discussion regarding austerity measures.” The men identified are (i) Plaintiff, (ii) Khalid AlAlkami and (iii) “Ahmad.” Report, p. 8.

33. The McKinsey Report describes Plaintiff as:

- “Saudi influencer with high following, mainly uses Twitter and Snapchat
- Omar has a multitude of negative tweets on topics such as austerity and the royal decrees”

Report, p. 8.

34. Khalid AlAlkami was imprisoned after being identified in the McKinsey Report.

35. Ahmad has disappeared – or has been disappeared – after being identified in the McKinsey Report.

36. Another dissenter whose tweet was merely quoted in the McKinsey Report as an example of “highly negative sentiment,” Aesa al Nukhifi, was imprisoned on March 24, 2017.

37. Every single critic identified by McKinsey in the McKinsey Report has been imprisoned except for Plaintiff. Plaintiff has been safe from KSA and MBS agents only because he is in Canada. However, this has not stopped KSA from attempting to harm Plaintiff (*e.g.*, either by proxy through his friends, family and correspondents in Saudi Arabia, sending agents to confront him and try to lure him back to KSA, hacking his phone, and even sending assassins to murder him in Canada).

38. Since the McKinsey Report was prepared, KSA has imprisoned and tortured Plaintiff’s family, friends, and associates.

39. In mid-May 2018, two KSA agents contacted Plaintiff and asked to meet with him. Throughout a series of meetings with Plaintiff, they identified themselves as agents of MBS and said they were operating on orders from Saud Al-Qahtani, who was then a senior strategic advisor to MBS. The Central Intelligence Agency has concluded that MBS ordered Mr. Khashoggi's murder, and Al-Qahtani was the strategist who organized it.

40. The two KSA agents told Plaintiff that MBS was disturbed by Plaintiff's political activities and criticisms against KSA in general and MBS in particular. The agents demanded that Plaintiff stop criticizing KSA and MBS and insisted that he return to Saudi Arabia. Just as had been done with Mr. Khashoggi,⁵ the agents promised Plaintiff a bright future in Saudi Arabia. Plaintiff refused both demands. When that failed the agents tried to persuade Plaintiff to come to the Saudi embassy in Ottawa with them. Plaintiff refused.

41. A few months after these meetings between Plaintiff and the KSA agents, MBS's agents lured Mr. Khashoggi to the Saudi Consulate in Istanbul where they tortured, assassinated and dismembered him.

42. In late July 2018 and early August 2018, agents acting on behalf of KSA increased their harassment campaign against Plaintiff. KSA security forces raided Plaintiff's family home in Jeddah in the middle of the night and used search dogs to conduct humiliating searches of the house and his family members. Two of Plaintiff's brothers were arrested and are still in prison without having been charged or tried.

43. Security personnel acting on behalf of KSA repeatedly torture Plaintiff's brothers to this day in an effort to pressure Plaintiff to stop his activism. Among other things, Plaintiff's

⁵ Prior to assassinating Mr. Khashoggi in Istanbul, KSA tried to lure him back to KSA with promises of protection and a high paying job if he were to return home.

brothers and friends have been waterboarded and electrocuted. Plaintiff's younger brother's teeth were pulled from his mouth. According to a report by Amnesty International, such conduct is consistent with KSA security personnel's mistreatment of imprisoned activists.

44. During the first few days of his imprisonment, KSA security personnel would take Plaintiff's younger brother out of his detention cell and order him to call Plaintiff to beg Plaintiff to stop his political activities.

45. Dozens of Plaintiff's other friends and associates who live in Saudi Arabia have also been arrested, tortured and subjected to inhumane and humiliating treatment even though most of them are not involved with or even interested in politics. KSA security personnel have done this to pressure Plaintiff to stop his political activities.

46. Plaintiff's friends and family that are not in prison have been subjected to travel bans that prevent them from leaving KSA.

47. KSA agents continue to imprison and torture Plaintiff's family and friends in an effort to get him to stop his political activities and return to KSA.

48. On or about October 15, 2018, less than two weeks after Mr. Khashoggi's assassination, another team of Saudi nationals (known as the "Tiger Squad") traveled from Saudi Arabia to Canada with the intention of assassinating Plaintiff and another Saudi dissident, Dr. Saad Aljabri. This mission was thwarted by the Royal Canadian Mounted Police and other law enforcement agencies in the United States and Canada.

49. KSA agents continue to use the tactics described in this complaint to pressure Plaintiff to stop his political activities.

50. Since the existence of the McKinsey Report became public when it was mentioned in an October 20, 2018 *New York Times* article entitled *Saudis Image Makers: a Troll*

Army and a Twitter Insider, McKinsey has admitted that it authored the report. In filings in California, McKinsey admits the McKinsey Report was created by a McKinsey analyst working in Saudi Arabia. In a statement from a McKinsey spokesperson about the McKinsey Report, McKinsey claimed:

We are horrified by the possibility, however remote, that [the McKinsey Report] could have been misused in any way... We have seen no evidence to suggest it was misused, but we are urgently investigating how and with whom the document was shared.

51. On October 23, 2018, US Senator Elizabeth Warren wrote to Kevin Sneader, McKinsey's Global Managing Partner, and demanded, among other things, that McKinsey provide the Senator the following information:

1. For whom was the 2015 [sic] report on the Saudi public's views of the Kingdom's economic austerity policies prepared?
2. What was the rationale for the preparation of this report?
3. To whom was the report distributed? Was it labeled or treated as a restricted access document?
4. Specifically, are you aware of any Saudi officials who obtained this report? Is so, please provide a complete list and explain how they received the report.

9. Was McKinsey ever commissioned by any individual or entity associated with the Saudi government – either in Saudi Arabia or outside of the country – to prepare a report or any other material related to identifying critics or any other indicators of public perception of the government?

12. Does McKinsey have a review or risk management process in place to evaluate prospective business projects with foreign governments that could lead to potential human rights abuses or other adverse consequences? If available, please provide any official McKinsey documents, in electronic form, that explain the process.

13. In an official statement on October 20, 2018, McKinsey announced that “we are urgently investigating how and with whom this document was shared.” Please provide an electronic, unredacted copy of this investigation when it is complete.

October 23, 2018 Senator Elizabeth Warren letter to K. Sneader.

52. Upon information and belief, Mr. Sneader and McKinsey never responded to Senator Warren’s letter.

53. Plaintiff did not know about the McKinsey Report’s existence or the fact that he was featured in it until it was mentioned in a *New York Times* article on October 20, 2018.

54. McKinsey has a long history of regularly and extensively advising KSA government agencies to the point that KSA’s Ministry of Planning has acquired the nickname “Ministry of McKinsey” by some Saudis, including KSA’s royal court.

55. The Brookings Institute attributes “the Kingdom’s new economic direction” and a major government cabinet reshuffling of high-ranking government ministers to McKinsey and MBS. MBS admitted that “McKinsey participates with us in many studies.” Indeed, McKinsey prepared a December 2015 report entitled “Moving Saudi Arabia’s Economy Beyond Oil.” That December 2015 report outlines an ambitious blueprint for KSA’s economic transformation and diversification away from oil. In what the Brookings Institute refers to as a “glaring omission,” the December 2015 report fails to sufficiently explain how KSA “will be able to change the mindset of everyday Saudi Arabian citizens, who have long been accustomed to state largesse that included fuel subsidies, loans, free land, and public sector jobs.” The Brookings Institute goes on to insist that this is a “key issue” and questions how everyday citizens in Saudi Arabia will react to the reforms, referencing public discontent to a number of higher utility prices, which led to King Salman firing the water minister to appease the public. KSA was even forced to cave to protestors’ demands in the Arab Spring to unveil a populist \$130 billion social spending

package. Controlling and manipulating public opinion (which include silencing voices like Plaintiff's) especially with respect to KSA's economic policies, is therefore, a vital requirement for MBS to achieve his goals.

56. McKinsey has long maintained an office in Riyadh, KSA's capital and financial center. On April 1, 2017, McKinsey announced it purchased a consulting firm known as Elixir, a politically connected Saudi consulting firm, and merged Elixir into its own Saudi operations. The new firm added 140 more employees to McKinsey's 300 employees in the region. Many of Elixir's younger consultants were graduates of Saudi universities whose parents were either connected to the Royal Family or otherwise had significant political connections. On its website, McKinsey boasts that its "Saudi Arabia Practice helps Saudi leaders."

57. In November 2017, in an effort to quell dissent and consolidate his family's power, MBS had 30 senior officials and scores of former government ministers arrested. Among those arrested and beaten was Hani Khoja, a McKinsey partner and founder of Elixir. During his captivity, McKinsey terminated Mr. Khoja and did not intervene, or even publicly complain about the treatment of one of its own partners.

58. One of the services McKinsey provides for its clients is the identification of problems. As one Senior McKinsey partner put it when discussing McKinsey Global Institute:

We do research that's relevant for business and for the economy, so we think about MGI's audience as being leaders in the private sector, policy, and government. We see our function as doing fact-based research that informs their decision making.

We see our role as developing a fact base that can inform our leaders as they make policy and other decisions. *Based on our research findings, we do try to highlight the biggest problem for leaders to solve.*

James Manyika Interview, August 16, 2019 (emphasis added).

59. Upon information and belief, and as initially reported by the *New York Times*, McKinsey subsequently gave or displayed the McKinsey Report, or the information contained therein to agents and representatives of KSA and MBS and/or to MBS himself.

60. On information and belief, McKinsey has not denied that the McKinsey Report was shown to KSA, MBS or his agents and representatives and/or ended up in the possession of MBS and/or his agents.

**FIRST CLAIM FOR RELIEF –
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

61. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 60 of this complaint as if fully set forth herein.

62. McKinsey used the powerful analytical tools at its disposal to analyze the Twitter activity of more than 316 million registered Twitter accounts in Saudi Arabia to identify the leading dissidents critical of KSA and MBS. Plaintiff was among the three dissidents McKinsey identified (greenlighted) as “major influencers.” McKinsey published its findings in the McKinsey Report.

63. At all relevant times, McKinsey was aware that identifying anyone as a “major influencer” critical of KSA and MBS would subject those identified to imprisonment, torture and even murder by KSA, MBS and their agents. McKinsey was also aware that the family members, friends and associates of those identified would be subject to the same treatment.

64. Despite knowing these dangers, McKinsey identified Plaintiff as one of the three most effective critics of KSA and MBS in the McKinsey Report.

65. Upon information and belief, the McKinsey Report was prepared to help, aid and abet KSA and MBS further the austerity programs McKinsey helped design and implement by silencing dissent.

66. Upon information and belief, McKinsey provided the McKinsey Report and/or its contents to agents and representatives of KSA and/or MBS.

67. McKinsey's conduct in subjecting Plaintiff and his family to these dangers was outrageous and unconscionable and so extreme in degree and outrageous in character as to go beyond all possible bounds of decency, so as to be regarded as atrocious and utterly intolerable in a civilized community.

68. As a direct result of McKinsey's conduct, Plaintiff was forced into hiding and had to move from hotel to hotel for four months to avoid being kidnapped or harmed. Plaintiff has also suffered severe emotional distress. Plaintiff suffers and continues to suffer humiliation, stress, anxiety, loss of sleep, emotional distress, pain and suffering, mental anguish and loss of enjoyment. KSA, MBS and their agents continue to use the tactics described in this complaint to pressure Plaintiff to cease all of his political activities. Plaintiff's friends and family members have been arrested and tortured and remain in KSA prisons where they continue to be tortured.

69. As a direct result of McKinsey's conduct, Plaintiff fears for his life, withdrew from regular attendance at the university and is unable to seek regular employment.

**SECOND CLAIM FOR RELIEF –
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

70. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 69 of this complaint as if fully set forth herein.

71. McKinsey used the powerful analytical tools at its disposal to analyze the Twitter activity of more than 316 million registered Twitter accounts in Saudi Arabia to identify the

leading dissidents critical of KSA and MBS. Plaintiff was among the three dissidents McKinsey identified as “major influencers.” McKinsey published its findings in the McKinsey Report.

72. At all times, McKinsey was aware that identifying anyone as a “major influencer” critical of KSA and MBS would subject those identified to imprisonment, torture and even murder by KSA, MBS and their agents. McKinsey was also aware that the family members, friends and associates of those identified would be subject to the same treatment.

73. Before the Report was drafted it was foreseeable that such information would be used to target dissidents because KSA’s abysmal human rights record and utter contempt for democratic values, political criticism and freedom of expression was well-known, including to those living and working outside of Saudi Arabia.

74. Despite knowing these dangers, McKinsey identified Plaintiff as one of the three most effective critics of KSA and MBS in the McKinsey Report.

75. Upon information and belief, the McKinsey Report was prepared to help, aid and abet KSA and MBS further the austerity programs McKinsey helped design and implement by silencing dissent.

76. Because of the close and long-standing relationship between McKinsey and KSA and MBS, McKinsey knew or should have known that the McKinsey Report or the information contained therein could be leaked to agents or representatives of KSA or MBS.

77. Despite knowing the dangers posed to the dissenters identified in the McKinsey Report, McKinsey made little or no effort to keep the report and its contents confidential.

78. McKinsey owed a duty to act prudently and protect the identity of the individuals identified in the McKinsey Report from disclosure to KSA or MBS.

79. Upon information and belief, McKinsey furnished copies of the McKinsey Report (and/or the information contained therein) to agents and representatives of KSA and/or MBS or agents and representatives of KSA and/or MBS otherwise obtained copies of the McKinsey Report (and/or the information contained therein).

80. As a direct result of McKinsey's negligent conduct, Plaintiff was forced into hiding and had to move from hotel to hotel for four months to avoid being kidnapped or harmed. Plaintiff has also suffered severe emotional distress. Plaintiff suffers and continues to suffer humiliation, stress, anxiety, emotional distress, pain and suffering, mental anguish, loss of sleep and loss of enjoyment. KSA, MBS and their agents continue to use the tactics described in this complaint to pressure Plaintiff to cease all of his political activities. Plaintiff's friends and family members have been arrested and tortured and remain in KSA prisons where they continue to be tortured.

81. As a direct result of McKinsey's conduct, Plaintiff fears for his life, withdrew from regular attendance at the university and is unable to seek regular employment.

82. McKinsey's conduct in subjecting Plaintiff and his family to these dangers was outrageous and unconscionable and so extreme in degree and outrageous in character as to go beyond all possible bounds of decency, so as to be regarded as atrocious and utterly intolerable in a civilized community.

THIRD CLAIM FOR RELIEF – NEGLIGENCE

83. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 82 of this complaint as if fully set forth herein.

84. McKinsey used the powerful analytical tools at its disposal to analyze the Twitter activity of more than 316 million registered Twitter accounts in Saudi Arabia to identify the

leading dissidents critical of KSA and MBS. Plaintiff was among the three dissidents McKinsey identified as “major influencers.” McKinsey published its findings in the McKinsey Report.

85. At all times, McKinsey was aware that identifying anyone as a “major influencer” critical of KSA and MBS would subject those identified to imprisonment, torture and even murder by KSA, MBS and their agents. McKinsey was also aware that the family members, friends and associates of those identified would be subject to the same treatment.

86. Before the Report was drafted it was foreseeable that such information would be used to target dissidents because KSA’s abysmal human rights record and utter contempt for democratic values, political criticism and freedom of expression was well-known, including to those living and working outside of Saudi Arabia.

87. Despite knowing these dangers, McKinsey identified Plaintiff as one of the three most effective critics of KSA and MBS in the McKinsey Report.

88. Upon information and belief, McKinsey provided the McKinsey Report and/or its contents to agents and representatives of KSA and/or MBS.

89. Because of the close and long-standing relationship between McKinsey and KSA and MBS, McKinsey knew or should have known that, even if the McKinsey Report was not intentionally provide to KSA or MBS, the report or the information contained therein could be leaked to agents or representatives of KSA or MBS.

90. Upon information and belief, McKinsey furnished copies of the McKinsey Report (and/or the information contained therein) to agents and representatives of KSA and/or MBS or agents and representatives of KSA and/or MBS otherwise obtained copies of the McKinsey Report (and/or the information contained therein).

91. Despite knowing the dangers posed to the dissenters identified in the McKinsey Report, McKinsey made little or no effort to keep the report and its contents confidential.

92. McKinsey owed a duty to act prudently and protect the identity of the individuals identified in the McKinsey Report from disclosure to KSA or MBS.

93. McKinsey owed a duty to act prudently and warn the individuals identified in the McKinsey Report that it had identified them as major influencers driving dissent.

94. McKinsey breached its duty to Plaintiff by not protecting his identity and by not warning him that he had been identified as a major influencer driving dissent.

95. McKinsey created the unreasonably dangerous condition by preparing the McKinsey Report and identifying individuals, including Plaintiff, as major influencers driving dissent.

96. As a direct result of McKinsey's negligent conduct, Plaintiff was forced into hiding and had to move from hotel to hotel for four months to avoid being kidnapped or harmed. Plaintiff has also suffered severe emotional distress. Plaintiff suffers and continues to suffer humiliation, stress, anxiety, emotional distress, pain and suffering, mental anguish, loss of sleep and loss of enjoyment. KSA, MBS and their agents continue to use the tactics described in this complaint to pressure Plaintiff to cease all of his political activities. Plaintiff's friends and family members have been arrested and tortured and remain in KSA prisons where they continue to be tortured.

97. As a direct result of McKinsey's conduct, Plaintiff fears for his life, withdrew from regular attendance at the university and is unable to seek regular employment.

98. McKinsey's conduct in subjecting Plaintiff and his family to these dangers was outrageous and unconscionable and so extreme in degree and outrageous in character as to go

beyond all possible bounds of decency, so as to be regarded as atrocious and utterly intolerable in a civilized community.

FOURTH CLAIM FOR RELIEF – PRIMA FACIE TORT

99. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 98 of this complaint as if fully set forth herein.

100. McKinsey used the powerful analytical tools at its disposal to analyze the Twitter activity of more than 316 million registered Twitter accounts in Saudi Arabia to identify the leading dissidents critical of KSA and MBS. Plaintiff was among the three dissidents McKinsey identified as “major influencers.” McKinsey published its findings in the McKinsey Report.

101. At all times, McKinsey was aware that identifying anyone as a “major influencer” critical of KSA and MBS would subject those identified to imprisonment, torture and even murder by KSA, MBS and their agents. McKinsey was also aware that the family members, friends and associates of those identified would be subject to the same treatment.

102. Despite knowing these dangers, McKinsey identified Plaintiff as one of the three most effective critics of KSA and MBS in the McKinsey Report.

103. Upon information and belief, the McKinsey Report was prepared to help, aid and abet KSA and MBS further the social and austerity programs McKinsey helped design and implement by silencing dissent.

104. Upon information and belief, the McKinsey agents, employees and partners who prepared the McKinsey Report viewed persons who dissented from the policies and programs created by KSA and MBS as detrimental to society and evil.

105. The McKinsey Report and/or the information contained therein was intentionally and/or negligently provided to agents and representatives of KSA and/or MBS or agents and

representatives of KSA and/or MBS otherwise obtained copies of the McKinsey Report (and/or the information contained therein)..

106. As a direct result of McKinsey's negligent conduct, Plaintiff was forced into hiding and had to move from hotel to hotel for four months to avoid being kidnapped or harmed. Plaintiff has also suffered severe emotional distress. Plaintiff suffers and continues to suffer humiliation, stress, anxiety, emotional distress, pain and suffering, mental anguish, loss of sleep and loss of enjoyment. KSA, MBS and their agents continue to use the tactics described in this complaint to pressure Plaintiff to cease all of his political activities. Plaintiff's friends and family members have been arrested and tortured and remain in KSA prisons where they continue to be tortured.

107. As a direct result of McKinsey's conduct, Plaintiff fears for his life, withdrew from regular attendance at the university and is unable to seek regular employment.

108. McKinsey's conduct in subjecting Plaintiff and his family to these dangers was outrageous and unconscionable and so extreme in degree and outrageous in character as to go beyond all possible bounds of decency, so as to be regarded as atrocious and utterly intolerable in a civilized community.

PRAYER FOR RELIEF

WHEREFORE, on his complaint, plaintiff Omar Abdulaziz respectfully requests that the Court:

- a. Enter judgment in his favor on all claims against the defendants;
- b. Award compensatory damages for economic loss, including but not limited to, loss of past and future income in an amount to be determined at trial;

- c. Award general damages for pain, suffering, humiliation, and emotional distress in an amount to be determined at trial;
- d. Award punitive damages in an amount to be determined at trial;
- e. Award interest, costs and reasonable attorneys' fees in this action; and
- f. For such further relief as the Court deems just and proper.

Dated: February 8, 2021

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THE LAW OFFICE OF JOHN F. OLSEN, LLC
John F. Olsen

/s/ John F. Olsen

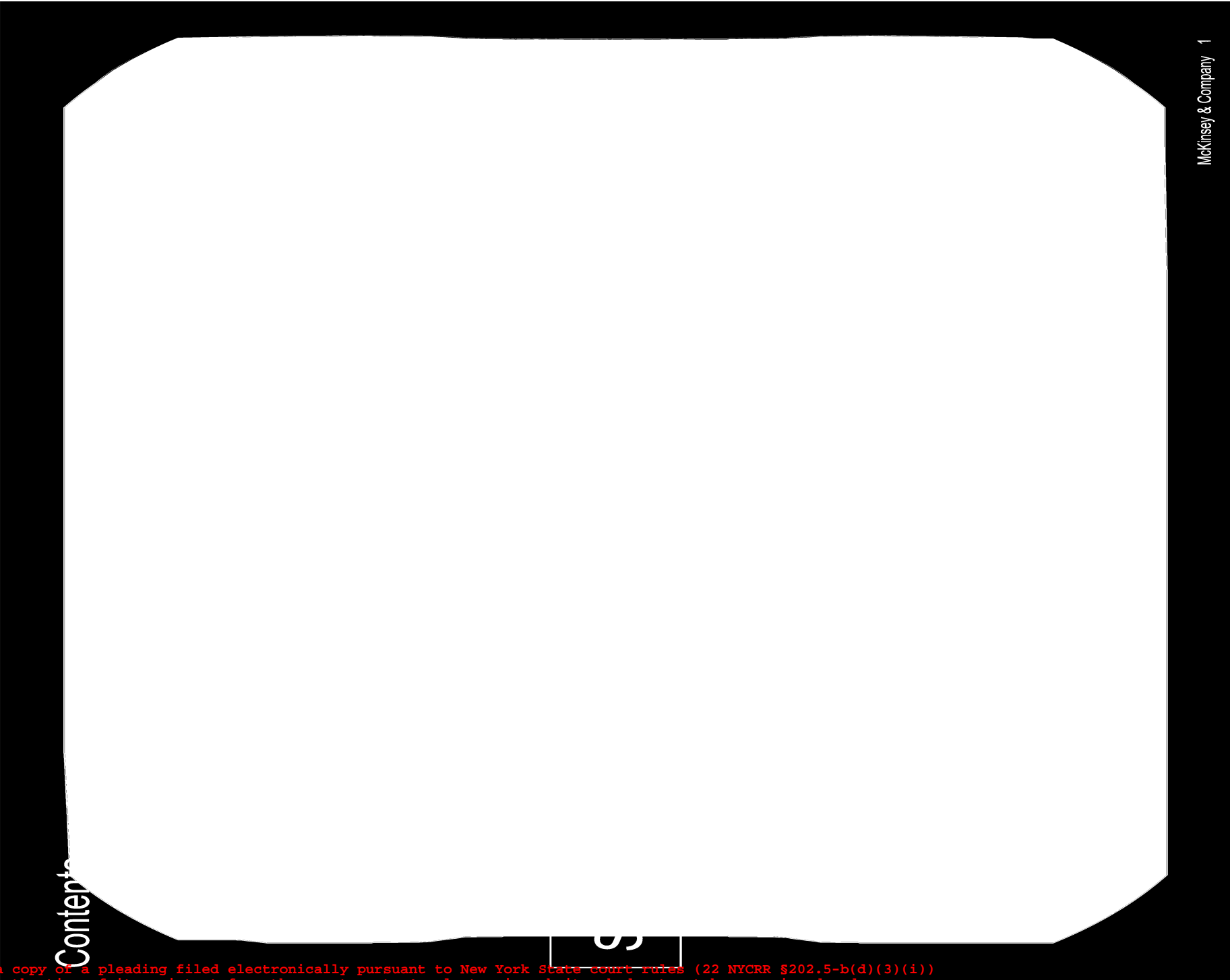
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EXHIBIT A



McKinsey & Company 1

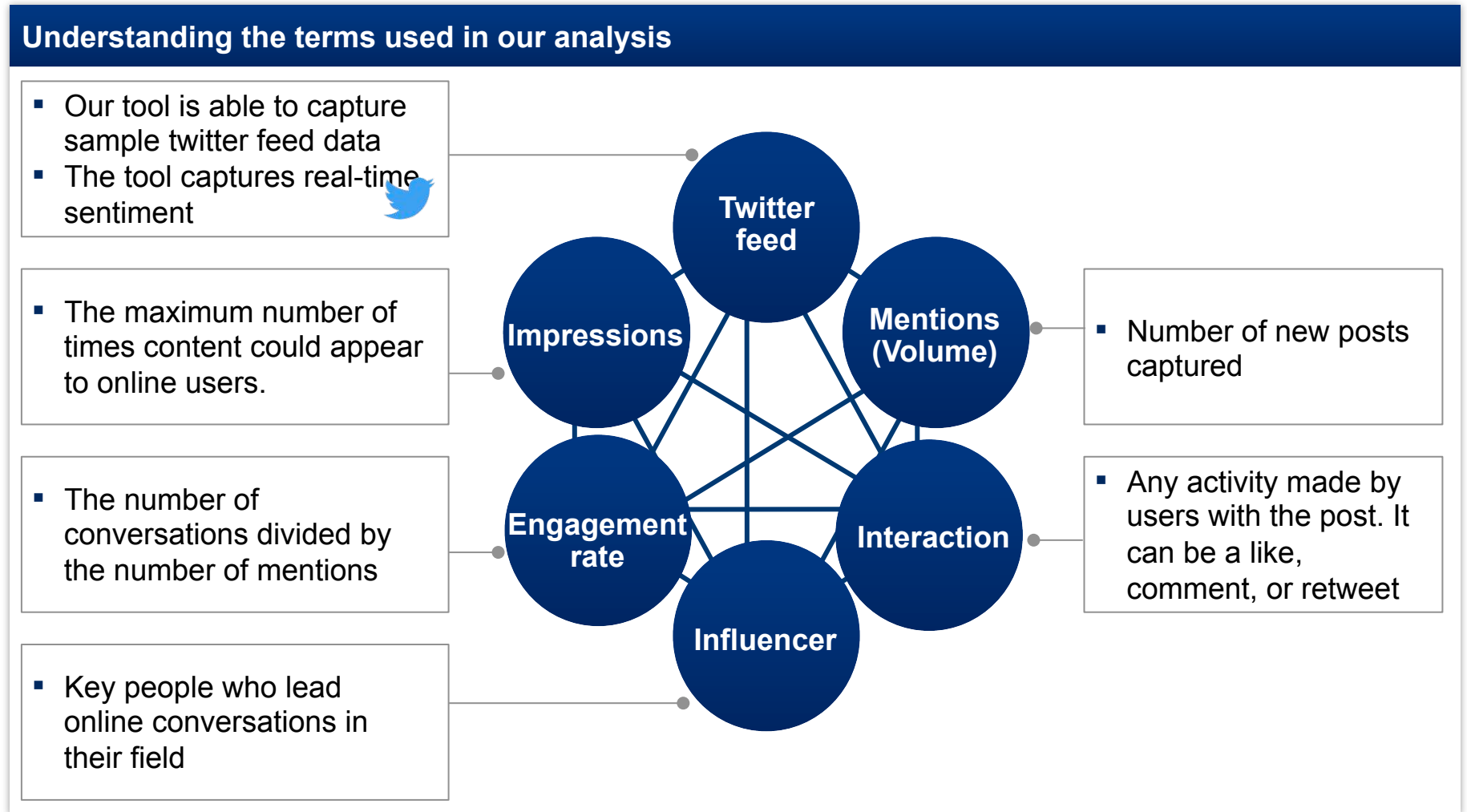
This is a copy of a pleading filed electronically pursuant to New York State court rules (22 NYCRR §202.5-b(d)(3)(i)) which, at the time of its printout from the court system's electronic website, had not yet been reviewed and approved by the County Clerk. Because court rules (22 NYCRR §202.5[d]) authorize the County Clerk to reject filings for various reasons, readers should be aware that documents bearing this legend may not have been accepted for filing by the County Clerk.

In order to gauge citizen sentiment on recent austerity measures announced in KSA, we closely analyzed data from twitter feed

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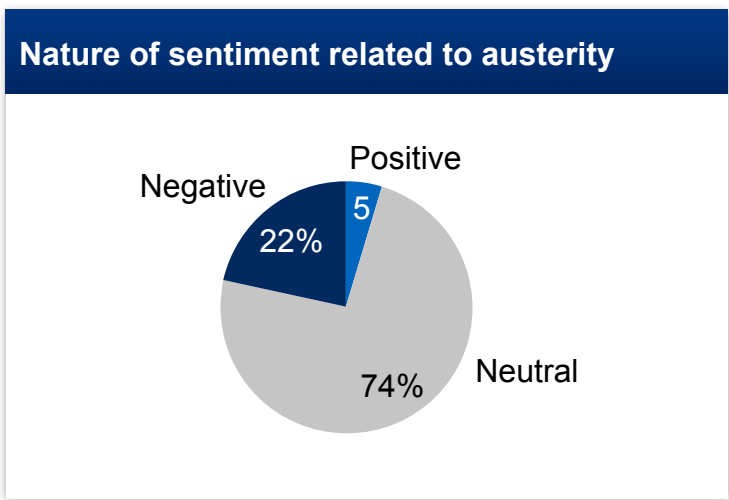


Overview of social media activity in KSA over a one month period post the announcement of austerity measures

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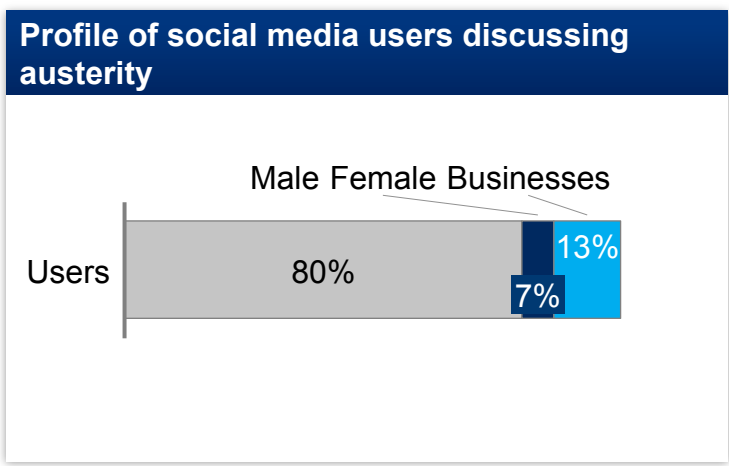
Volume and intensity of social media activity related to austerity

- Number of tweets > **20.31K**, involving > **82.5K** people
- Potential reach (impressions) > **1.54** million people
- Number of interactions (likes and retweets) > **86.3K**
- Number of conversations > **6.6K** i.e. engagement rate >**32.4%**



Most commonly used words related to austerity

- Majority of discussions are discussing the issuance royal decrees



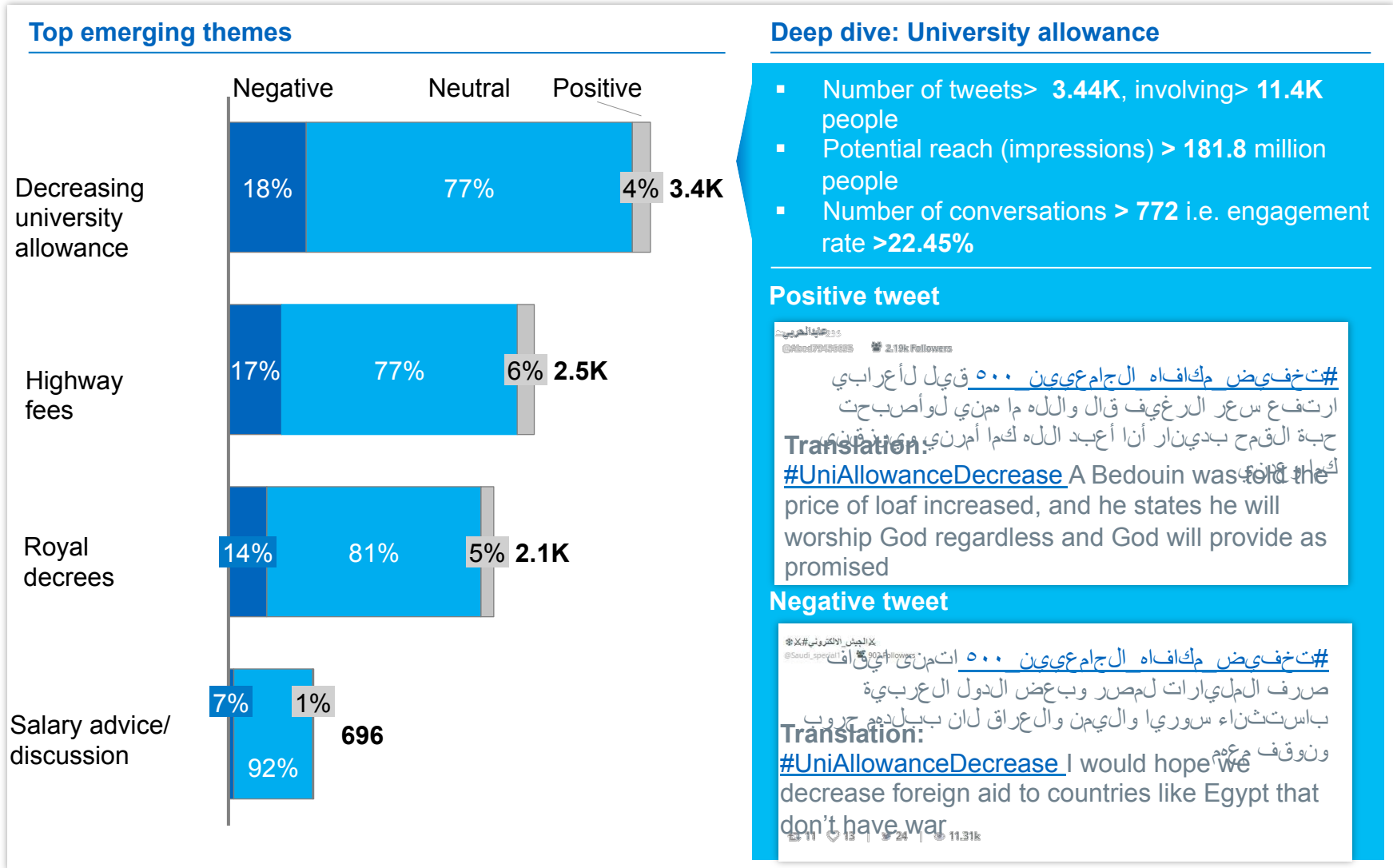
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Decrease of university allowances, was the most discussed topic related to austerity

■ Negative
■ Positive
■ Neutral

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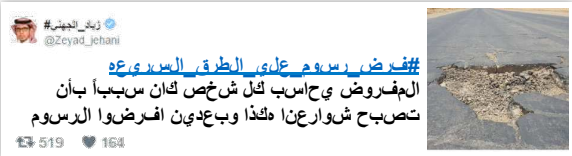
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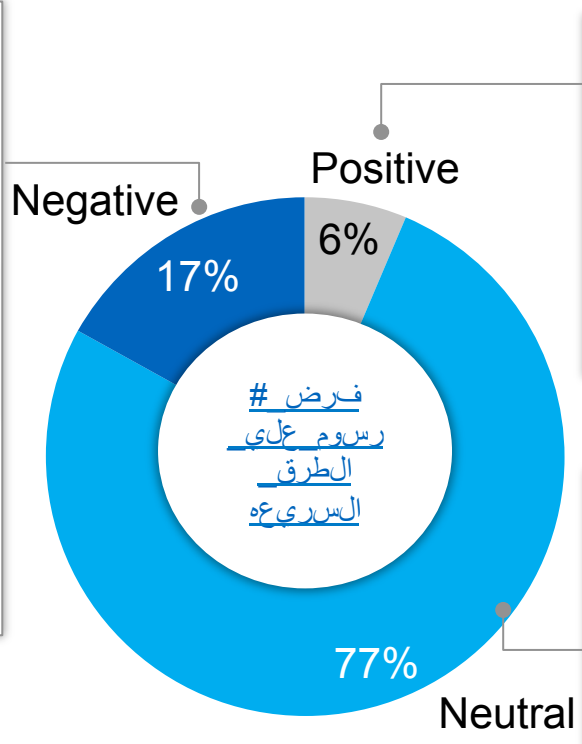
The second most tweeted hashtag was #HighwayFeesIssuance with 2.5K tweets فرض رسوم علي الطرق السريعه

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- Most negative mentions are complaining about current street quality and traffic, therefore highway maintenance should precede the fees issued



Translation:
[#HighwayFeesIssuance](#)
 The individuals who are responsible for our streets' current state should be prosecuted before the issuing the fees



Translation:
 This is not austerity, this is a plan to remedy our high inflation and reduce it by over 40%
[#HighwayFeesIssuance](#)

- Economist with **41.6 K** followers discusses the topic of highway fees issuance

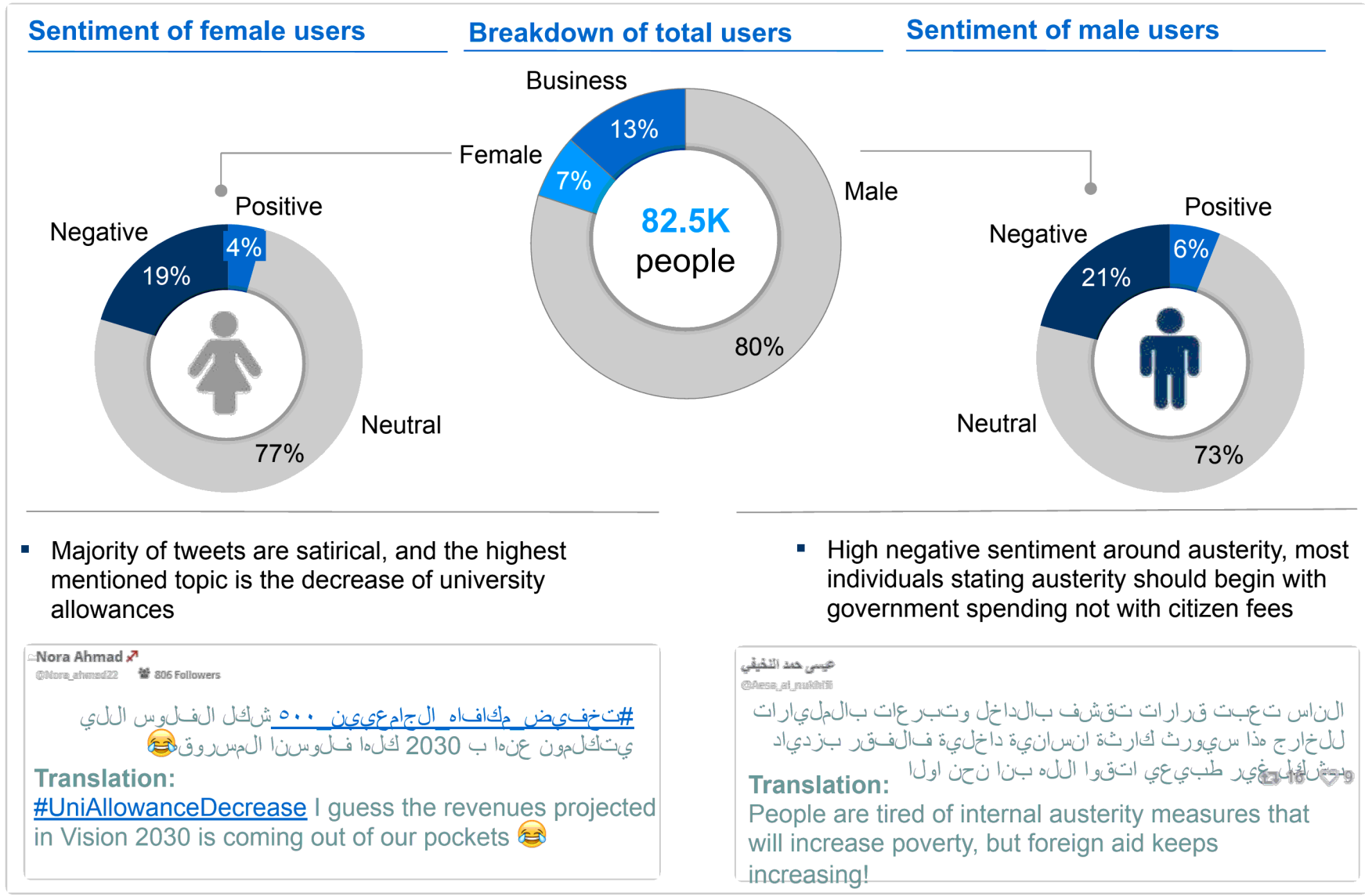


Translation:
 Increasing revenue by issuing fees like this won't work unless there's a simultaneous decrease the millions wasted in the government.
[#HighwayFeesIssuance](#)



Female users have been more satirical regarding austerity, whereas male users have higher negative sentiment

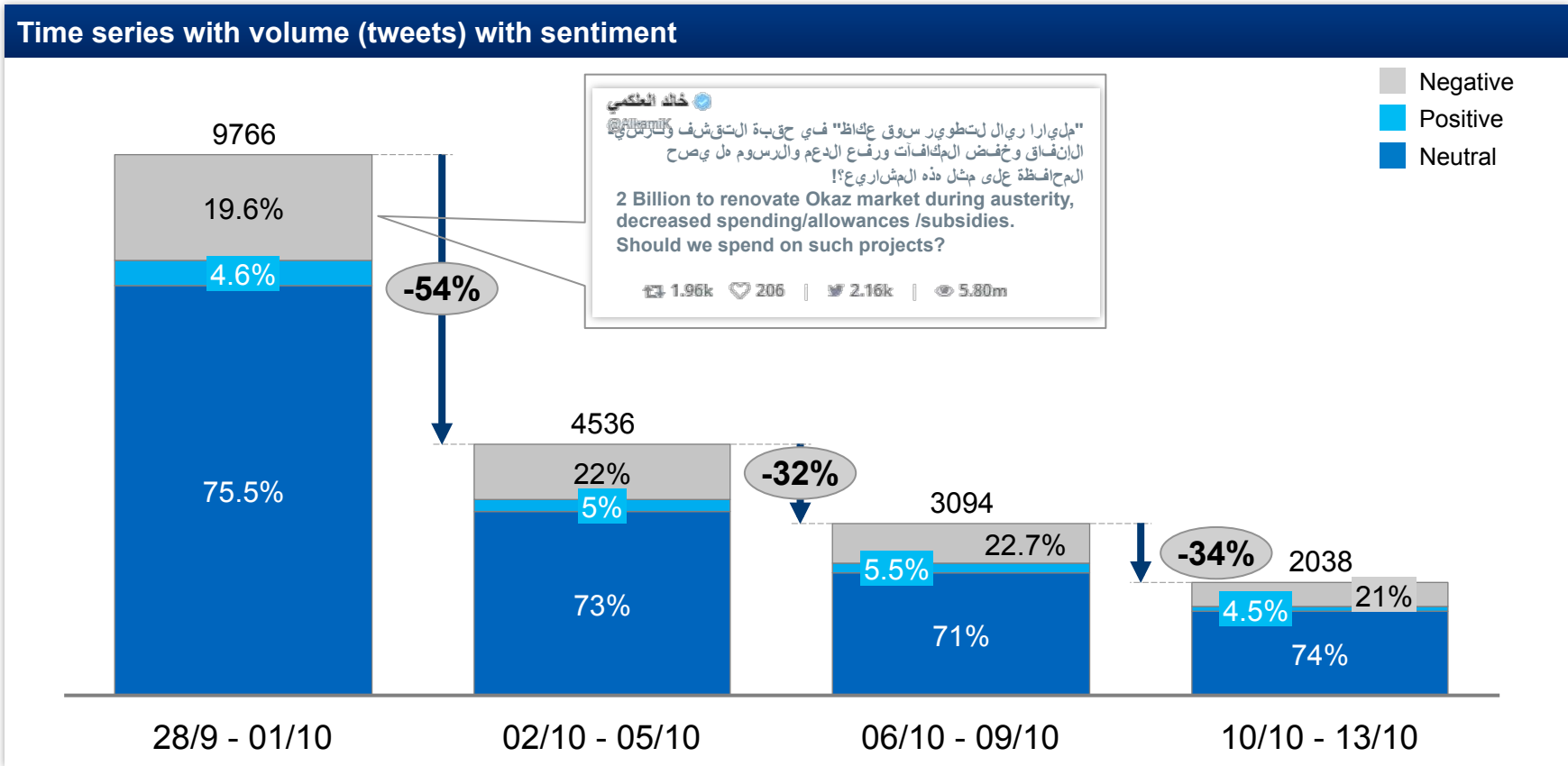
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Discussion is declining in terms of tweets, however negative sentiment has been consistently high¹

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Deep dive: time series

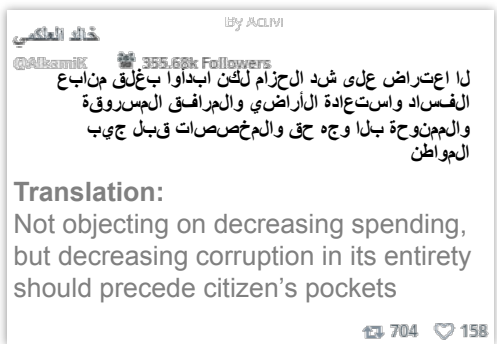
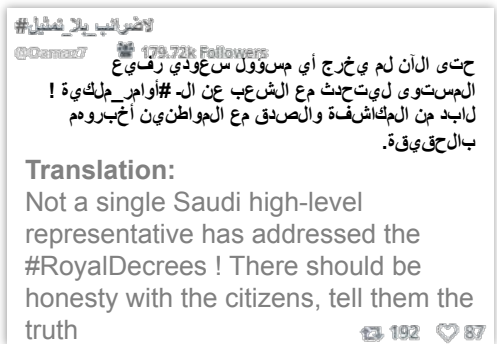

- The first quarter of October saw high discussion on austerity with over **9.8K tweets** in the span of four days
- Tweets throughout mid-October have decreased 20% in volume, however individuals in discussion are mostly negative about the austerity measures, stating that other spending (i.e project spending, foreign aid ...) should be have been decreased

¹ Social Media analysis 28-09-16 to 13-10-16

Major influencers in Saudi driving discussion regarding austerity measures

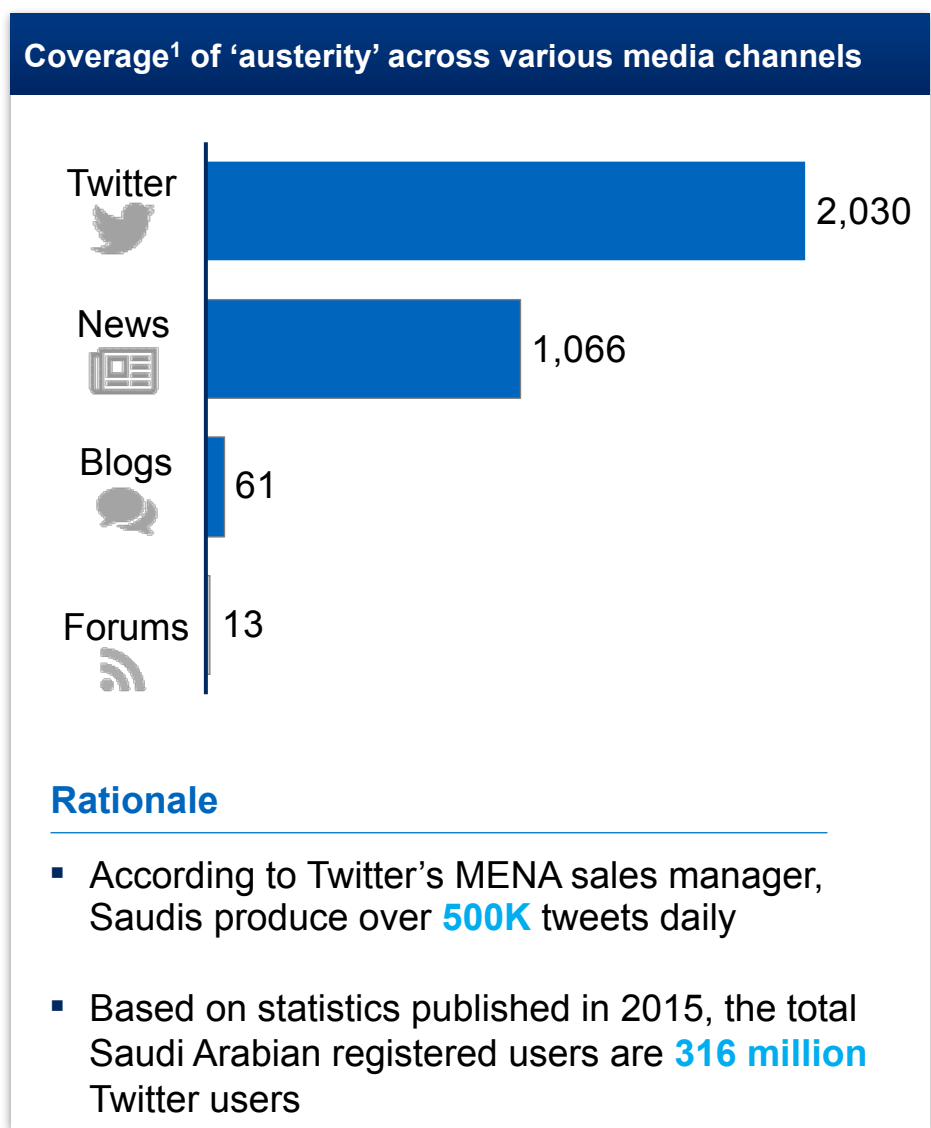
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Theme	Khalid AlAlkami	Omar Abdulaziz	Ahmad
Followers	355.9 K	182.65 K	144 K
Interaction	4.45 K	521	877
Example	<ul style="list-style-type: none"> Saudi writer, comments are mostly revolving around the Saudi economy He also discusses different hot topics effecting the Saudi society Wrote multiple negative tweets regarding austerity  <p>Translation: Not objecting on decreasing spending, but decreasing corruption in its entirety should precede citizen's pockets</p>	<ul style="list-style-type: none"> Saudi influencer with high following, mainly uses Twitter and Snapchat Omar has a multitude of negative tweets on topics such as austerity and the royal decrees  <p>Translation: Not a single Saudi high-level representative has addressed the #RoyalDecrees ! There should be honesty with the citizens, tell them the truth</p>	<ul style="list-style-type: none"> Ahmed tweets mostly on economic topics as well as Saudi society hot topics He has written 3 tweets that had over 877 likes and retweets  <p>Translation: Saudi is still negotiating an arms deal with BEA, according to BBC the contract is worth 40 billion GBP #Austerity</p>

In addition to twitter, there is a high coverage of austerity measures on various news channels as well

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¹ Social Media analysis 27-09-16 to 27-10-16; number of tweets/ articles etc.
SOURCE: Alyawm, BBC

News: Okaz newspaper

"Even if members of the society reduce their spending, there will still be difficulty managing with the decreased salaries. I know many individuals who have never known luxury but have little to no savings at month's end. They can barely afford their current expenses but they are most effected."

-Khalid AlSulaiman

News: Al-Jazirah newspaper

"It's highly unlikely that the Saudi citizen will transform from a lazy consumer to a productive frugal individual; unless motivated or compelled to do so. We should welcome the austerity measures!"

-Jasser AlHarbash

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