

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

DOES 1 THROUGH 677, Urabá, Colombia)	
)	
Plaintiffs,)	
)	
v.)	
)	
CHIQUITA BRANDS INTERNATIONAL, INC., 250 East Fifth St. Cincinnati, OH 45202)	Case No. _____
)	
and)	JURY TRIAL DEMANDED
)	
DOE DEFENDANT CORPORATIONS 1-10,)	
)	
and)	
)	
DOE DEFENDANTS 11-25,)	
)	
Defendants.)	

COMPLAINT

Plaintiffs, through counsel, sue Defendants and allege:

INTRODUCTION

1. This Complaint is brought by the legal heirs and estates of 677 Colombian citizens who were murdered by the Autodefensas Unidas de Colombia ("AUC"), a right-wing terrorist organization operating in Colombia, South America, which received financial and other support from Defendants.

2. The cases in the instant action are organized into three groups. The first group of cases includes 121 murders which occurred after the Defendant says it ceased making payments to the AUC, on February 4, 2004. A second group of cases includes 546 murders which occurred between 1995 and 1997. These date ranges were excluded in case 10-cv-00404-RJL (Does 1-976 v. Chiquita Brands et al) in order to segregate the cases in which the Defendant admitted paying the AUC at the time the murder occurred. A third category in the instant complaint includes four personal injury claims, and several other cases not included in previous complaints.

3. In addition to allegations made in the prior complaint, 10-cv-00404-RJL (Does 1-976 v. Chiquita Brands et al), five new sections, alleging additional facts, are included herein as §§ I-M, encompassing ¶¶ 830-876 infra.

4. This case arises as a result of the actions of Defendant Chiquita Brands International, Inc., and its subsidiaries and affiliates (collectively, "Chiquita"), in funding, arming, and otherwise supporting terrorist organizations in Colombia in their campaign of terror against the civilian population of the Urabá region, in order to maintain its profitable control of Colombia's banana growing regions. Plaintiffs are family members of trade unionists, banana workers, political organizers, social activists, and others targeted and killed by terrorists, most notably the paramilitary organization United Self-Defense Forces of Colombia (Autodefensas Unidas de Colombia, or AUC), throughout the 1990s and until about 2007. In order to produce bananas in an environment free from labor opposition and social disturbances, Chiquita funded, armed, and otherwise supported the AUC. The deaths of Plaintiffs' relatives were a direct, foreseeable, and intended result of Chiquita's illegal and tortuous support of terrorist organizations.

Chiquita's actions violated not only Colombian law and U.S. law, but also international law prohibiting crimes against humanity, extrajudicial killing, torture, war crimes, and other abuses.

JURISDICTION

5. The Court has jurisdiction over this case under 28 U.S.C. §1331 (federal question jurisdiction); 28 U.S.C. § 1350 (Alien Tort Claims Act); 18 U.S.C. § 1964(c) (Racketeer Influenced and Corrupt Organizations Act); and 28 U.S.C. §1332 (diversity jurisdiction). Plaintiffs and Defendants are citizens of different states and the damages sought by this Complaint exceed the jurisdictional minimum for this Court.

6. In addition, Plaintiffs invoke the supplemental jurisdiction of this Court with respect to claims based upon laws of Colombia, the United States, the States of Ohio, New Jersey, the District of Columbia, Florida or any other applicable jurisdiction pursuant to 28 U.S.C. § 1367.

PARTIES

7. The term "Plaintiffs" herein includes the named plaintiffs and the decedent on behalf of whom they bring this action.

8. Plaintiffs include the next of kin and the estates of individuals killed in the Urabá region of Colombia before January 1, 1997 and after February 4, 2004, four personal injury cases, and several others occurring between 1997 and 2004 that were not filed in previous complaints.

9. The terms "wife" and "husband", as used herein, include common law spouses as well as those individuals married in a church but not obtaining a marriage license from the Colombian authorities. Male parental relationships for children born out of wedlock,

such as "father", "daughter" and so forth, indicate that the father has given the child his surname and accepted the child as his own.

10. There are a total of 663 decedents and 663 estates in this complaint. The estates of each victim include the spouse and all minor and adult children of the decedent, and all persons dependent on the decedent. There are also four personal injury cases, in which the victim survived.

11. The plaintiffs referenced in the preceding and following paragraphs bring their claims anonymously because the disclosure of their identities and those of the decedents would expose them to a high risk of violent reprisals, intimidation and death at the hands of the paramilitaries still operating in Colombia.

12. Decedents are referred to as Decedent 1, Decedent 2, and so on. Decedents' estates are referred to as Estate of Decedent 1, and so on. Next of kin and/or personal representatives corresponding to these Decedents are identified as Doe 1, Doe 2, and so on, with identification numbers of the Decedents, their Estates, and the Plaintiffs all corresponding to one another. The terms "John Doe" and "Jane Doe" have been dispensed with to simplify the complaint, since gender should not be pertinent to any of their claims.

13. In approximately 80% of the cases joined herein, the victim was executed by one or more shots to the head fired at short range, suggesting that the victim was executed while under the control of the person who killed him. Approximately 15% of the cases involve disappearances. The process of identifying bodies in found common graves is ongoing in Colombia, and will take many years to complete. The remaining individuals were killed with machetes, pick-axes, poles, battery acid, or other means. In a large

number of these cases, perhaps a majority, the AUC member who murdered the individual has confessed the crime in the Colombian Commission of Justice and Peace, a criminal judicial proceeding which is ongoing on Colombia.

14. Publishing further details about these murders, particularly in a single document, would assist Colombian paramilitaries in identifying the Plaintiffs in this case. Successor organizations to the AUC - primarily the *Urabeños* (formerly known as the *Aguila Negras*) and *Paisas*, still control Urabá, still murder people on a weekly basis, and wield significant influence among the army and police there.

15. Murders occurring in the Uraba region are not normally investigated by the Colombian police. Most often, a funeral home will send a car to the scene of a homicide to recover the body, and no police officer will ever visit the scene of the crime or do any other investigation. Because of an ongoing war crimes tribunal, called the Commission of Justice and Peace (Comisión de Justicia y Paz), many victims have now filed complaints with the police or prosecutors' offices, but investigations are only made of extreme incidents, such as highly-publicized massacres of large groups of people. The police say that investigations are pointless because the public are too afraid to cooperate with them. Successors to the AUC still control, militarily and politically, the Uraba region where most of the Plaintiffs still live. The Colombian military and police cannot or will not protect the people of this region from the AUC. In fact, a great many military, police, and other officials are believed to be active members of the AUC's successor organizations in Uraba.

16. A number of the Plaintiffs in this action, many of whom personally observed the murders of their family members, stated that they were threatened with death if they ever

told anyone, including the police, what had happened. Most of them did not ever speak with the police, and many have only joined in this action under assurances of confidentiality. In a number of cases, the person responsible for the murder of their family member still maintains a position of authority in their neighborhood, as a member or commander of a paramilitary organization. Murders occur in broad daylight in all of the major urban areas in Uraba, the majority of which are committed by paramilitary groups which emerged from the AUC after it demobilized.

17. A large proportion of the Plaintiffs in this action have been displaced from their homes, and live in shanty towns. Although they are living in extremely basic conditions, without electricity, running water or sanitation, they feel safer than if they lived in the rural areas from where they had fled. Many of the Plaintiffs believe that they are still being hunted by the AUC. These shanty towns are reportedly patrolled by the AUC at night, which is when people normally disappear or are murdered. Still, the Plaintiffs are unable to return to their homes and choose to live in these areas, which resemble refugee camps, instead.

18. On January 17, 2011, unknown individuals entered the office of a non governmental organization associated with the Colombian Ministry of Agriculture and Rural Development in Apartadó, and stole a USB flash memory containing a database of the thousands of individuals who have filed administrative claims for properties taken from them by the AUC, or sold at low prices under duress from the AUC.¹ This was headline news in every major news organization in Colombia, including *Caracol*, *El Espectador*, *Semana*, *Radio Cadena Nacional* (RCN), *El Tiempo*, *El Colombiano*, *El*

¹ See, for example, "Robo de USB con información de desplazados busca frenar restitución de tierras: CNR," *Caracol*, January 20, 2011, online at <http://www.caracol.com.co/nota.aspx?id=1414095>

Pais, and others. Although the USB was recovered several days later, the incident was taken so seriously that the top law enforcement official in Colombia, General Oscar Naranjo, sent a special team to Apartadó immediately. He held a press conference, promising not only to find the guilty parties, but to provide police protection to anyone who felt threatened by the robbery. Although General Naranjo thought that AUC members were probably responsible, the results of the investigation have not been made public. As background to the news reports about the USB theft, several articles mentioned that approximately seven people associated with these administrative cases have been assassinated in the last two years.²

19. A previous legal action brought by individuals living in the town of San José de Apartadó, a town in Uraba near our office, resulted only in the murder of witnesses by the AUC. Peace Brigades International and other human rights groups assign people to this area to accompany controversial leaders, so that they are not assassinated by the AUC. It is rare for other foreigners to travel through this region.

20. Paramilitary flyers circulated in Uraba during the last 3 years have included such things as lists of names of people to be killed and warnings that "prostitutes and drug addicts" on the streets after 10:00 PM will be shot on sight. Spray-painted graffiti is used by paramilitary groups to mark territory. About two years ago, the AUC declared a *paro armado*, a ban on all travel in the region. Violation of the ban was punishable by death, and the residents of Uraba took heed. Residents hid in their homes for several days until the travel ban was ended.

² See , for example, "Hallan memoria USB con datos de beneficiarios de tierras robada en Colombia," EFE, January 22, 2011, online at <http://noticias.terra.com.pe/internacional/hallan-memoria-usb-con-datos-de-beneficiarios-de-tierras-robada-en-colombia,893781e368ead210VgnVCM10000098f154d0RCRD.html>

21. In the Spring of 2009, Daniel Rendón Herrera, a top paramilitary commander, was apprehended in Necoclí, where many of the murders in the instant action occurred. According to news reports, at the time of his capture, Mr. Rendon Herrera had approximately 4,000 armed men under his command. Many of the Decedents in the instant action were killed by Daniel Rendon Herrera's group, which succeeded the Elmer Cardenas Block of the AUC.

22. The foregoing PP 11-21 demonstrate the grave risks Plaintiffs will suffer if their identities are publicly disclosed in this action.

23. Each of the decedents were at all material times citizens and residents of Colombia. Addresses for plaintiffs are given in subsequent paragraphs only to the level of detail of the town or county (*municipio*) in which they live. This is done to protect their safety. In addition, plaintiffs live in an underdeveloped jungle region of Colombia where houses are often not numbered. Many, if not a majority, of the plaintiffs in this action do not have telephones. A substantial number of them are illiterate.

24. One or more of the next of kin referenced in the subsequent paragraphs assert their claims herein, or alternatively, a third party will be appointed the personal representative of the decedent's estate if required by law. This action is brought on behalf of Does number 1-677 and by the next of kin of those who were murdered. Each of the next of kin and decedents were at all material times citizens of Colombia.

Individual Plaintiffs

Group 1: Murders occurring after Feb. 4, 2004

25. On 3/29/2004, Decedent 1 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 1, who was the mother of Decedent 1, is the next of kin

and legal heir to Decedent 1, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 1 brings this action on behalf of Decedent 1 and on behalf of the Estate of Decedent 1.

26. On 2/8/2004, Decedent 2 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 2, who was the mother of Decedent 2, is the next of kin and legal heir to Decedent 2, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 2 brings this action on behalf of Decedent 2 and on behalf of the Estate of Decedent 2.

27. In 2004, Decedent 3 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 3, who was the father of Decedent 3, is the next of kin and legal heir to Decedent 3, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 3 brings this action on behalf of Decedent 3 and on behalf of the Estate of Decedent 3.

28. On 1/25/2006, Decedent 4 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 4, who was the wife of Decedent 4, is the next of kin and legal heir to Decedent 4, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 4 brings this action on behalf of Decedent 4 and on behalf of the Estate of Decedent 4.

29. On 7/6/2006, Decedent 5 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 5, who was the mother of Decedent 5, is the next of kin and legal heir to Decedent 5, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 5 brings this action on behalf of Decedent 5 and on behalf of the Estate of Decedent 5.

30. On 2/27/2007, Decedent 6 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 6, who was the mother of Decedent 6, is the next of kin and legal heir to Decedent 6, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 6 brings this action on behalf of Decedent 6 and on behalf of the Estate of Decedent 6.

31. On 9/21/2004, Decedent 7 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 7, who was the mother of Decedent 7, is the next of kin and legal heir to Decedent 7, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 7 brings this action on behalf of Decedent 7 and on behalf of the Estate of Decedent 7.

32. On 7/26/2007, Decedent 8 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 8, who was the father of Decedent 8, is the next of kin and legal heir to Decedent 8, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 8 brings this action on behalf of Decedent 8 and on behalf of the Estate of Decedent 8.

33. On 9/17/2006, Decedent 9 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 9, who was the wife of Decedent 9, is the next of kin and legal heir to Decedent 9, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 9 brings this action on behalf of Decedent 9 and on behalf of the Estate of Decedent 9.

34. On 7/20/2004, Decedent 10 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 10, who was the brother of Decedent 10, is the next of kin and legal heir to Decedent 10, and resides in the *municipio* of Apartado in the Urabá

region of Colombia. Doe 10 brings this action on behalf of Decedent 10 and on behalf of the Estate of Decedent 10.

35. On 3/4/2006, Decedent 11 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 11, who was the wife of Decedent 11, is the next of kin and legal heir to Decedent 11, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 11 brings this action on behalf of Decedent 11 and on behalf of the Estate of Decedent 11.

36. On 10/22/2004, Decedent 12 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 12, who was the mother of Decedent 12, is the next of kin and legal heir to Decedent 12, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 12 brings this action on behalf of Decedent 12 and on behalf of the Estate of Decedent 12.

37. On February 2005, Decedent 13 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 13, who was the aunt of Decedent 13, is the next of kin and legal heir to Decedent 13, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 13 brings this action on behalf of Decedent 13 and on behalf of the Estate of Decedent 13.

38. On 6/28/2005, Decedent 14 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 14, who was the mother of Decedent 14, is the next of kin and legal heir to Decedent 14, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 14 brings this action on behalf of Decedent 14 and on behalf of the Estate of Decedent 14.

39. On 7/6/2004, Decedent 15 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 15, who was the wife of Decedent 15, is the next of kin and legal heir to Decedent 15, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 15 brings this action on behalf of Decedent 15 and on behalf of the Estate of Decedent 15.

40. On 7/5/2004, Decedent 16 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 16, who was the wife of Decedent 16, is the next of kin and legal heir to Decedent 16, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 16 brings this action on behalf of Decedent 16 and on behalf of the Estate of Decedent 16.

41. On 3/29/2006, Decedent 17 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 17, who was the mother of Decedent 17, is the next of kin and legal heir to Decedent 17, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 17 brings this action on behalf of Decedent 17 and on behalf of the Estate of Decedent 17.

42. On 11/17/2007, Decedent 18 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 18, who was the aunt of Decedent 18, is the next of kin and legal heir to Decedent 18, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 18 brings this action on behalf of Decedent 18 and on behalf of the Estate of Decedent 18.

43. On 12/20/2006, Decedent 19 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 19, who was the mother of Decedent 19, is the next of kin and legal heir to Decedent 19, and resides in the *municipio* of Apartado in the Urabá

region of Colombia. Doe 19 brings this action on behalf of Decedent 19 and on behalf of the Estate of Decedent 19.

44. On 6/7/2005, Decedent 20 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 20, who was the sister of Decedent 20, is the next of kin and legal heir to Decedent 20, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 20 brings this action on behalf of Decedent 20 and on behalf of the Estate of Decedent 20.

45. On 6/9/2006, Decedent 21 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 21, who was the mother of Decedent 21, is the next of kin and legal heir to Decedent 21, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 21 brings this action on behalf of Decedent 21 and on behalf of the Estate of Decedent 21.

46. On 12/27/2005, Decedent 22 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 22, who was the father of Decedent 22, is the next of kin and legal heir to Decedent 22, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 22 brings this action on behalf of Decedent 22 and on behalf of the Estate of Decedent 22.

47. On 7/22/2005, Decedent 23 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 23, who was the mother of Decedent 23, is the next of kin and legal heir to Decedent 23, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 23 brings this action on behalf of Decedent 23 and on behalf of the Estate of Decedent 23.

48. On 2/6/2007, Decedent 24 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 24, who was the daughter of Decedent 24, is the next of kin and legal heir to Decedent 24, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 24 brings this action on behalf of Decedent 24 and on behalf of the Estate of Decedent 24.

49. On 1/17/2005, Decedent 25 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 25, who was the mother of Decedent 25, is the next of kin and legal heir to Decedent 25, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 25 brings this action on behalf of Decedent 25 and on behalf of the Estate of Decedent 25.

50. On 8/10/2005, Decedent 26 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 26, who was the daughter of Decedent 26, is the next of kin and legal heir to Decedent 26, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 26 brings this action on behalf of Decedent 26 and on behalf of the Estate of Decedent 26.

51. On 4/5/2004, Decedent 27 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 27, who was the wife of Decedent 27, is the next of kin and legal heir to Decedent 27, and resides in the *municipio* of Chigorodo in the Urabá region of Colombia. Doe 27 brings this action on behalf of Decedent 27 and on behalf of the Estate of Decedent 27.

52. On 4/6/2004, Decedent 28 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 28, who was the wife of Decedent 28, is the next of kin and legal heir to Decedent 28, and resides in the *municipio* of Chigorodo in the Urabá

region of Colombia. Doe 28 brings this action on behalf of Decedent 28 and on behalf of the Estate of Decedent 28.

53. On 7/3/2007, Decedent 29 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 29, who was the mother of Decedent 29, is the next of kin and legal heir to Decedent 29, and resides in the *municipio* of Chigorodo in the Urabá region of Colombia. Doe 29 brings this action on behalf of Decedent 29 and on behalf of the Estate of Decedent 29.

54. On 12/30/2006, Decedent 30 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 30, who was the wife of Decedent 30, is the next of kin and legal heir to Decedent 30, and resides in the *municipio* of Chigorodo in the Urabá region of Colombia. Doe 30 brings this action on behalf of Decedent 30 and on behalf of the Estate of Decedent 30.

55. On 3/6/2008, Decedent 31 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 31, who was the wife of Decedent 31, is the next of kin and legal heir to Decedent 31, and resides in the *municipio* of Chigorodo in the Urabá region of Colombia. Doe 31 brings this action on behalf of Decedent 31 and on behalf of the Estate of Decedent 31.

56. On 4/24/2007, Decedent 32 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 32, who was the son of Decedent 32, is the next of kin and legal heir to Decedent 32, and resides in the *municipio* of Chigorodo in the Urabá region of Colombia. Doe 32 brings this action on behalf of Decedent 32 and on behalf of the Estate of Decedent 32.

57. On 5/22/2007, Decedent 33 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 33, who was the wife of Decedent 33, is the next of kin and legal heir to Decedent 33, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 33 brings this action on behalf of Decedent 33 and on behalf of the Estate of Decedent 33.

58. On 11/22/2007, Decedent 34 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 34, who was the mother of Decedent 34, is the next of kin and legal heir to Decedent 34, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 34 brings this action on behalf of Decedent 34 and on behalf of the Estate of Decedent 34.

59. On 11/18/2005, Decedent 35 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 35, who was the wife of Decedent 35, is the next of kin and legal heir to Decedent 35, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 35 brings this action on behalf of Decedent 35 and on behalf of the Estate of Decedent 35.

60. On 4/10/2007, Decedent 36 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 36, who was the wife of Decedent 36, is the next of kin and legal heir to Decedent 36, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 36 brings this action on behalf of Decedent 36 and on behalf of the Estate of Decedent 36.

61. On 2/27/2005, Decedent 37 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 37, who was the mother of Decedent 37, is the next of kin and legal heir to Decedent 37, and resides in the *municipio* of Turbo in the Urabá region

of Colombia. Doe 37 brings this action on behalf of Decedent 37 and on behalf of the Estate of Decedent 37.

62. On 3/11/2005, Decedent 38 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 38, who was the mother of Decedent 38, is the next of kin and legal heir to Decedent 38, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 38 brings this action on behalf of Decedent 38 and on behalf of the Estate of Decedent 38.

63. On 9/21/2007, Decedent 39 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 39, who was the mother of Decedent 39, is the next of kin and legal heir to Decedent 39, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 39 brings this action on behalf of Decedent 39 and on behalf of the Estate of Decedent 39.

64. On 11/6/2005, Decedent 40 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 40, who was the wife of Decedent 40, is the next of kin and legal heir to Decedent 40, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 40 brings this action on behalf of Decedent 40 and on behalf of the Estate of Decedent 40.

65. On 4/3/2006, Decedent 41 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 41, who was the mother of Decedent 41, is the next of kin and legal heir to Decedent 41, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 41 brings this action on behalf of Decedent 41 and on behalf of the Estate of Decedent 41.

66. On 7/18/2004, Decedent 42 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 42, who was the wife of Decedent 42, is the next of kin and legal heir to Decedent 42, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 42 brings this action on behalf of Decedent 42 and on behalf of the Estate of Decedent 42.

67. On 7/7/2004, Decedent 43 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 43, who was the mother of Decedent 43, is the next of kin and legal heir to Decedent 43, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 43 brings this action on behalf of Decedent 43 and on behalf of the Estate of Decedent 43.

68. On 12/29/2006, Decedent 44 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 44, who was the wife of Decedent 44, is the next of kin and legal heir to Decedent 44, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 44 brings this action on behalf of Decedent 44 and on behalf of the Estate of Decedent 44.

69. On 10/22/2006, Decedent 45 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 45, who was the mother of Decedent 45, is the next of kin and legal heir to Decedent 45, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 45 brings this action on behalf of Decedent 45 and on behalf of the Estate of Decedent 45.

70. On 10/1/2004, Decedent 46 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 46, who was the mother of Decedent 46, is the next of kin and legal heir to Decedent 46, and resides in the *municipio* of Turbo in the Urabá region

of Colombia. Doe 46 brings this action on behalf of Decedent 46 and on behalf of the Estate of Decedent 46.

71. On 12/18/2004, Decedent 47 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 47, who was the mother of Decedent 47, is the next of kin and legal heir to Decedent 47, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 47 brings this action on behalf of Decedent 47 and on behalf of the Estate of Decedent 47.

72. On 10/9/2004, Decedent 48 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 48, who was the mother of Decedent 48, is the next of kin and legal heir to Decedent 48, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 48 brings this action on behalf of Decedent 48 and on behalf of the Estate of Decedent 48.

73. On 7/14/2006, Decedent 49 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 49, who was the wife of Decedent 49, is the next of kin and legal heir to Decedent 49, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 49 brings this action on behalf of Decedent 49 and on behalf of the Estate of Decedent 49.

74. On 4/3/2005, Decedent 50 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 50, who was the wife of Decedent 50, is the next of kin and legal heir to Decedent 50, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 50 brings this action on behalf of Decedent 50 and on behalf of the Estate of Decedent 50.

75. On 8/2/2004, Decedent 51 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 51, who was the mother of Decedent 51, is the next of kin and legal heir to Decedent 51, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 51 brings this action on behalf of Decedent 51 and on behalf of the Estate of Decedent 51.

76. On 9/23/2005, Decedent 52 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 52, who was the wife of Decedent 52, is the next of kin and legal heir to Decedent 52, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 52 brings this action on behalf of Decedent 52 and on behalf of the Estate of Decedent 52.

77. On 7/16/2005, Decedent 53 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 53, who was the wife of Decedent 53, is the next of kin and legal heir to Decedent 53, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 53 brings this action on behalf of Decedent 53 and on behalf of the Estate of Decedent 53.

78. On 7/4/2006, Decedent 54 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 54, who was the mother of Decedent 54, is the next of kin and legal heir to Decedent 54, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 54 brings this action on behalf of Decedent 54 and on behalf of the Estate of Decedent 54.

79. On 10/4/2005, Decedent 55 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 55, who was the mother of Decedent 55, is the next of kin and legal heir to Decedent 55, and resides in the *municipio* of Turbo in the Urabá region

of Colombia. Doe 55 brings this action on behalf of Decedent 55 and on behalf of the Estate of Decedent 55.

80. On 6/15/2006, Decedent 56 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 56, who was the wife of Decedent 56, is the next of kin and legal heir to Decedent 56, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 56 brings this action on behalf of Decedent 56 and on behalf of the Estate of Decedent 56.

81. On 9/13/2004, Decedent 57 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 57, who was the mother of Decedent 57, is the next of kin and legal heir to Decedent 57, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 57 brings this action on behalf of Decedent 57 and on behalf of the Estate of Decedent 57.

82. On 3/22/2005, Decedent 58 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 58, who was the mother of Decedent 58, is the next of kin and legal heir to Decedent 58, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 58 brings this action on behalf of Decedent 58 and on behalf of the Estate of Decedent 58.

83. On 10/14/2006, Decedent 59 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 59, who was the wife of Decedent 59, is the next of kin and legal heir to Decedent 59, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 59 brings this action on behalf of Decedent 59 and on behalf of the Estate of Decedent 59.

84. On 10/6/2008, Decedent 60 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 60, who was the mother of Decedent 60, is the next of kin and legal heir to Decedent 60, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 60 brings this action on behalf of Decedent 60 and on behalf of the Estate of Decedent 60.

85. On 9/12/2004, Decedent 61 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 61, who was the wife of Decedent 61, is the next of kin and legal heir to Decedent 61, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 61 brings this action on behalf of Decedent 61 and on behalf of the Estate of Decedent 61.

86. On 4/2/2005, Decedent 62 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 62, who was the wife of Decedent 62, is the next of kin and legal heir to Decedent 62, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 62 brings this action on behalf of Decedent 62 and on behalf of the Estate of Decedent 62.

87. On 5/14/2006, Decedent 63 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 63, who was the mother of Decedent 63, is the next of kin and legal heir to Decedent 63, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 63 brings this action on behalf of Decedent 63 and on behalf of the Estate of Decedent 63.

88. On 12/27/2005, Decedent 64 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 64, who was the wife of Decedent 64, is the next of kin and legal heir to Decedent 64, and resides in the *municipio* of Turbo in the Urabá region

of Colombia. Doe 64 brings this action on behalf of Decedent 64 and on behalf of the Estate of Decedent 64.

89. On 4/29/2006, Decedent 65 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 65, who was the wife of Decedent 65, is the next of kin and legal heir to Decedent 65, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 65 brings this action on behalf of Decedent 65 and on behalf of the Estate of Decedent 65.

90. On 11/27/2004, Decedent 66 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 66, who was the father of Decedent 66, is the next of kin and legal heir to Decedent 66, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 66 brings this action on behalf of Decedent 66 and on behalf of the Estate of Decedent 66.

91. On 12/11/2004, Decedent 67 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 67, who was the mother of Decedent 67, is the next of kin and legal heir to Decedent 67, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 67 brings this action on behalf of Decedent 67 and on behalf of the Estate of Decedent 67.

92. On 8/15/2007, Decedent 68 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 68, who was the mother of Decedent 68, is the next of kin and legal heir to Decedent 68, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 68 brings this action on behalf of Decedent 68 and on behalf of the Estate of Decedent 68.

93. On 10/27/2006, Decedent 69 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 69, who was the mother of Decedent 69, is the next of kin and legal heir to Decedent 69, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 69 brings this action on behalf of Decedent 69 and on behalf of the Estate of Decedent 69.

94. On 12/5/2004, Decedent 70 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 70, who was the mother of Decedent 70, is the next of kin and legal heir to Decedent 70, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 70 brings this action on behalf of Decedent 70 and on behalf of the Estate of Decedent 70.

95. On 6/17/2004, Decedent 71 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 71, who was the mother of Decedent 71, is the next of kin and legal heir to Decedent 71, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 71 brings this action on behalf of Decedent 71 and on behalf of the Estate of Decedent 71.

96. On 11/12/2005, Decedent 72 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 72, who was the mother of Decedent 72, is the next of kin and legal heir to Decedent 72, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 72 brings this action on behalf of Decedent 72 and on behalf of the Estate of Decedent 72.

97. On 4/14/2004, Decedent 73 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 73 is the next of kin and legal heir to Decedent 73, and

resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 73 brings this action on behalf of Decedent 73 and on behalf of the Estate of Decedent 73.

98. On 12/23/2006, Decedent 74 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 74, who was the mother of Decedent 74, is the next of kin and legal heir to Decedent 74, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 74 brings this action on behalf of Decedent 74 and on behalf of the Estate of Decedent 74.

99. On 3/19/2005, Decedent 75 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 75, who was the mother of Decedent 75, is the next of kin and legal heir to Decedent 75, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 75 brings this action on behalf of Decedent 75 and on behalf of the Estate of Decedent 75.

100. On 11/3/2004, Decedent 76 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 76, who was the mother of Decedent 76, is the next of kin and legal heir to Decedent 76, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 76 brings this action on behalf of Decedent 76 and on behalf of the Estate of Decedent 76.

101. On 6/11/2004, Decedent 77 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 77, who was the wife of Decedent 77, is the next of kin and legal heir to Decedent 77, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 77 brings this action on behalf of Decedent 77 and on behalf of the Estate of Decedent 77.

102. On 4/7/2004, Decedent 78 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 78, who was the mother of Decedent 78, is the next of kin and legal heir to Decedent 78, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 78 brings this action on behalf of Decedent 78 and on behalf of the Estate of Decedent 78.

103. On 8/15/2004, Decedent 79 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 79, who was the father of Decedent 79, is the next of kin and legal heir to Decedent 79, and resides in the *municipio* of Necocli in the Urabá region of Colombia. Doe 79 brings this action on behalf of Decedent 79 and on behalf of the Estate of Decedent 79.

104. On 8/8/2004, Decedent 80 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 80, who was the mother of Decedent 80, is the next of kin and legal heir to Decedent 80, and resides in the *municipio* of Necocli in the Urabá region of Colombia. Doe 80 brings this action on behalf of Decedent 80 and on behalf of the Estate of Decedent 80.

105. On 9/4/2005, Decedent 81 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 81, who was the sister of Decedent 81, is the next of kin and legal heir to Decedent 81, and resides in the *municipio* of Necocli in the Urabá region of Colombia. Doe 81 brings this action on behalf of Decedent 81 and on behalf of the Estate of Decedent 81.

106. On 9/30/2006, Decedent 82 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 82, who was the wife of Decedent 82, is the next of kin and legal heir to Decedent 82, and resides in the *municipio* of Necocli in the Urabá region

of Colombia. Doe 82 brings this action on behalf of Decedent 82 and on behalf of the Estate of Decedent 82.

107. On July 2004, Decedent 83 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 83, who was the wife of Decedent 83, is the next of kin and legal heir to Decedent 83, and resides in the *municipio* of Necocli in the Urabá region of Colombia. Doe 83 brings this action on behalf of Decedent 83 and on behalf of the Estate of Decedent 83.

108. On 2/8/2004, Decedent 84 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 84, who was the mother of Decedent 84, is the next of kin and legal heir to Decedent 84, and resides in the *municipio* of Necocli in the Urabá region of Colombia. Doe 84 brings this action on behalf of Decedent 84 and on behalf of the Estate of Decedent 84.

109. On 6/14/2006, Decedent 85 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 85, who was the daughter of Decedent 85, is the next of kin and legal heir to Decedent 85, and resides in the *municipio* of Necocli in the Urabá region of Colombia. Doe 85 brings this action on behalf of Decedent 85 and on behalf of the Estate of Decedent 85.

110. On 5/5/2008, Decedent 86 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 86, who was the wife of Decedent 86, is the next of kin and legal heir to Decedent 86, and resides in the *municipio* of Necocli in the Urabá region of Colombia. Doe 86 brings this action on behalf of Decedent 86 and on behalf of the Estate of Decedent 86.

111. On 5/22/2007, Decedent 87 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 87, who was the wife of Decedent 87, is the next of kin and legal heir to Decedent 87, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 87 brings this action on behalf of Decedent 87 and on behalf of the Estate of Decedent 87.

112. On 3/13/2004, Decedent 88 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 88, who was the mother of Decedent 88, is the next of kin and legal heir to Decedent 88, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 88 brings this action on behalf of Decedent 88 and on behalf of the Estate of Decedent 88.

113. On 3/7/2005, Decedent 89 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 89, who was the mother of Decedent 89, is the next of kin and legal heir to Decedent 89, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 89 brings this action on behalf of Decedent 89 and on behalf of the Estate of Decedent 89.

114. On 7/15/2005, Decedent 90 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 90, who was the mother of Decedent 90, is the next of kin and legal heir to Decedent 90, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 90 brings this action on behalf of Decedent 90 and on behalf of the Estate of Decedent 90.

115. On 2/5/2006, Decedent 91 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 91, who was the mother of Decedent 91, is the next of kin and legal heir to Decedent 91, and resides in the *municipio* of Dabeiba in the Urabá

region of Colombia. Doe 91 brings this action on behalf of Decedent 91 and on behalf of the Estate of Decedent 91.

116. On 9/25/2004, Decedent 92 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 92, who was the sister of Decedent 92, is the next of kin and legal heir to Decedent 92, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 92 brings this action on behalf of Decedent 92 and on behalf of the Estate of Decedent 92.

117. On 3/4/2006, Decedent 93 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 93, who was the wife of Decedent 93, is the next of kin and legal heir to Decedent 93, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 93 brings this action on behalf of Decedent 93 and on behalf of the Estate of Decedent 93.

118. On 8/13/2005, Decedent 94 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 94, who was the grandmother of Decedent 94, is the next of kin and legal heir to Decedent 94, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 94 brings this action on behalf of Decedent 94 and on behalf of the Estate of Decedent 94.

119. On 5/3/2004, Decedent 95 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 95, who was the mother of Decedent 95, is the next of kin and legal heir to Decedent 95, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 95 brings this action on behalf of Decedent 95 and on behalf of the Estate of Decedent 95.

120. On 2/26/2006, Decedent 96 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 96, who was the wife of Decedent 96, is the next of kin and legal heir to Decedent 96, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 96 brings this action on behalf of Decedent 96 and on behalf of the Estate of Decedent 96.

121. On 5/30/2005, Decedent 97 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 97, who was the father of Decedent 97, is the next of kin and legal heir to Decedent 97, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 97 brings this action on behalf of Decedent 97 and on behalf of the Estate of Decedent 97.

122. On 11/19/2004, Decedent 98 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 98, who was the wife of Decedent 98, is the next of kin and legal heir to Decedent 98, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 98 brings this action on behalf of Decedent 98 and on behalf of the Estate of Decedent 98.

123. On 4/21/2004, Decedent 99 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 99, who was the wife of Decedent 99, is the next of kin and legal heir to Decedent 99, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 99 brings this action on behalf of Decedent 99 and on behalf of the Estate of Decedent 99.

124. On 3/13/2004, Decedent 100 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 100, who was the mother of Decedent 100, is the next of kin and legal heir to Decedent 100, and resides in the *municipio* of Dabeiba in the Urabá

region of Colombia. Doe 100 brings this action on behalf of Decedent 100 and on behalf of the Estate of Decedent 100.

125. On 12/17/2005, Decedent 101 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 101, who was the wife of Decedent 101, is the next of kin and legal heir to Decedent 101, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 101 brings this action on behalf of Decedent 101 and on behalf of the Estate of Decedent 101.

126. On 7/3/2004, Decedent 102 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 102, who was the daughter of Decedent 102, is the next of kin and legal heir to Decedent 102, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 102 brings this action on behalf of Decedent 102 and on behalf of the Estate of Decedent 102.

127. On 11/13/2004, Decedent 103 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 103, who was the son of Decedent 103, is the next of kin and legal heir to Decedent 103, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 103 brings this action on behalf of Decedent 103 and on behalf of the Estate of Decedent 103.

128. On 7/15/2005, Decedent 104 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 104, who was the mother of Decedent 104, is the next of kin and legal heir to Decedent 104, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 104 brings this action on behalf of Decedent 104 and on behalf of the Estate of Decedent 104.

129. On 2/28/2007, Decedent 105 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 105, who was the mother of Decedent 105, is the next of kin and legal heir to Decedent 105, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 105 brings this action on behalf of Decedent 105 and on behalf of the Estate of Decedent 105.

130. On 1/20/2006, Decedent 106 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 106, who was the mother of Decedent 106, is the next of kin and legal heir to Decedent 106, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 106 brings this action on behalf of Decedent 106 and on behalf of the Estate of Decedent 106.

131. On 3/18/2005, Decedent 107 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 107, who was the mother of Decedent 107, is the next of kin and legal heir to Decedent 107, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 107 brings this action on behalf of Decedent 107 and on behalf of the Estate of Decedent 107.

132. On 6/3/2005, Decedent 108 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 108, who was the mother of Decedent 108, is the next of kin and legal heir to Decedent 108, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 108 brings this action on behalf of Decedent 108 and on behalf of the Estate of Decedent 108.

133. On 3/14/2004, Decedent 109 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 109, who was the mother of Decedent 109, is the next of kin and legal heir to Decedent 109, and resides in the *municipio* of Dabeiba in the Urabá

region of Colombia. Doe 109 brings this action on behalf of Decedent 109 and on behalf of the Estate of Decedent 109.

134. On 7/16/2005, Decedent 110 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 110, who was the wife of Decedent 110, is the next of kin and legal heir to Decedent 110, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 110 brings this action on behalf of Decedent 110 and on behalf of the Estate of Decedent 110.

135. On 4/28/2004, Decedent 111 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 111, who was the sister of Decedent 111, is the next of kin and legal heir to Decedent 111, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 111 brings this action on behalf of Decedent 111 and on behalf of the Estate of Decedent 111.

136. On 4/20/2004, Decedent 112 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 112, who was the wife of Decedent 112, is the next of kin and legal heir to Decedent 112, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 112 brings this action on behalf of Decedent 112 and on behalf of the Estate of Decedent 112.

137. On 6/18/2006, Decedent 113 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 113, who was the mother of Decedent 113, is the next of kin and legal heir to Decedent 113, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 113 brings this action on behalf of Decedent 113 and on behalf of the Estate of Decedent 113.

138. On 7/3/2005, Decedent 114 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 114, who was the wife of Decedent 114, is the next of kin and legal heir to Decedent 114, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 114 brings this action on behalf of Decedent 114 and on behalf of the Estate of Decedent 114.

139. On 5/10/2005, Decedent 115 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 115, who was the mother of Decedent 115, is the next of kin and legal heir to Decedent 115, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 115 brings this action on behalf of Decedent 115 and on behalf of the Estate of Decedent 115.

140. On 3/4/2005, Decedent 116 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 116, who was the mother of Decedent 116, is the next of kin and legal heir to Decedent 116, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 116 brings this action on behalf of Decedent 116 and on behalf of the Estate of Decedent 116.

141. On 6/10/2006, Decedent 117 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 117, who was the father of Decedent 117, is the next of kin and legal heir to Decedent 117, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 117 brings this action on behalf of Decedent 117 and on behalf of the Estate of Decedent 117.

142. On 8/30/2006, Decedent 118 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 118, who was the uncle of Decedent 118, is the next of kin and legal heir to Decedent 118, and resides in the *municipio* of Dabeiba in the Urabá

region of Colombia. Doe 118 brings this action on behalf of Decedent 118 and on behalf of the Estate of Decedent 118.

143. On 5/2/2004, Decedent 119 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 119, who was the mother of Decedent 119, is the next of kin and legal heir to Decedent 119, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 119 brings this action on behalf of Decedent 119 and on behalf of the Estate of Decedent 119.

144. On 9/17/2004, Decedent 120 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 120, who was the wife of Decedent 120, is the next of kin and legal heir to Decedent 120, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 120 brings this action on behalf of Decedent 120 and on behalf of the Estate of Decedent 120.

145. On 3/5/2006, Doe 121 was permanently disabled by the AUC, which received support from Chiquita and/or Banadex. Doe 121 resides in the *municipio* of Turbo in the Urabá region of Colombia.

Group 2: Murders Occurring between 1995 and 1997

146. On 9/25/1995, Decedent 122 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 122, who was the wife of Decedent 122, is the next of kin and legal heir to Decedent 122, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 122 brings this action on behalf of Decedent 122 and on behalf of the Estate of Decedent 122.

147. On 4/20/1996, Decedent 123 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 123, who was the wife of Decedent 123, is the next of kin

and legal heir to Decedent 123, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 123 brings this action on behalf of Decedent 123 and on behalf of the Estate of Decedent 123.

148. On 5/18/1996, Decedent 124 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 124, who was the sister of Decedent 124, is the next of kin and legal heir to Decedent 124, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 124 brings this action on behalf of Decedent 124 and on behalf of the Estate of Decedent 124.

149. On 8/5/1996, Decedent 125 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 125, who was the wife of Decedent 125, is the next of kin and legal heir to Decedent 125, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 125 brings this action on behalf of Decedent 125 and on behalf of the Estate of Decedent 125.

150. On 12/11/1995, Decedent 126 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 126, who was the wife of Decedent 126, is the next of kin and legal heir to Decedent 126, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 126 brings this action on behalf of Decedent 126 and on behalf of the Estate of Decedent 126.

151. On 12/12/1995, Decedent 127 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 127, who was the mother of Decedent 127, is the next of kin and legal heir to Decedent 127, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 127 brings this action on behalf of Decedent 127 and on behalf of the Estate of Decedent 127.

152. On 6/29/1996, Decedent 128 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 128, who was the wife of Decedent 128, is the next of kin and legal heir to Decedent 128, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 128 brings this action on behalf of Decedent 128 and on behalf of the Estate of Decedent 128.

153. On 6/3/1995, Decedent 129 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 129, who was the wife of Decedent 129, is the next of kin and legal heir to Decedent 129, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 129 brings this action on behalf of Decedent 129 and on behalf of the Estate of Decedent 129.

154. On 7/25/1995, Decedent 130 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 130, who was the wife of Decedent 130, is the next of kin and legal heir to Decedent 130, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 130 brings this action on behalf of Decedent 130 and on behalf of the Estate of Decedent 130.

155. On 12/2/1995, Decedent 131 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 131, who was the sister of Decedent 131, is the next of kin and legal heir to Decedent 131, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 131 brings this action on behalf of Decedent 131 and on behalf of the Estate of Decedent 131.

156. On 11/6/1996, Decedent 132 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 132, who was the wife of Decedent 132, is the next of kin and legal heir to Decedent 132, and resides in the *municipio* of Apartadó in the Urabá

region of Colombia. Doe 132 brings this action on behalf of Decedent 132 and on behalf of the Estate of Decedent 132.

157. On 5/27/1995, Decedent 133 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 133, who was the wife of Decedent 133, is the next of kin and legal heir to Decedent 133, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 133 brings this action on behalf of Decedent 133 and on behalf of the Estate of Decedent 133.

158. On 8/5/1996, Decedent 134 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 134, who was the mother of Decedent 134, is the next of kin and legal heir to Decedent 134, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 134 brings this action on behalf of Decedent 134 and on behalf of the Estate of Decedent 134.

159. On 7/7/1995, Decedent 135 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 135, who was the daughter of Decedent 135, is the next of kin and legal heir to Decedent 135, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 135 brings this action on behalf of Decedent 135 and on behalf of the Estate of Decedent 135.

160. On 11/8/1996, Decedent 136 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 136, who was the wife of Decedent 136, is the next of kin and legal heir to Decedent 136, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 136 brings this action on behalf of Decedent 136 and on behalf of the Estate of Decedent 136.

161. On 7/11/1995, Decedent 137 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 137, who was the mother of Decedent 137, is the next of kin and legal heir to Decedent 137, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 137 brings this action on behalf of Decedent 137 and on behalf of the Estate of Decedent 137.

162. On 7/16/1996, Decedent 138 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 138, who was the wife of Decedent 138, is the next of kin and legal heir to Decedent 138, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 138 brings this action on behalf of Decedent 138 and on behalf of the Estate of Decedent 138.

163. In July of 1996, Decedent 139 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 139, who was the sister of Decedent 139, is the next of kin and legal heir to Decedent 139, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 139 brings this action on behalf of Decedent 139 and on behalf of the Estate of Decedent 139.

164. On 5/17/1996, Decedent 140 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 140, who was the wife of Decedent 140, is the next of kin and legal heir to Decedent 140, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 140 brings this action on behalf of Decedent 140 and on behalf of the Estate of Decedent 140.

165. On 2/14/1996, Decedent 141 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 141, who was the mother of Decedent 141, is the next of kin and legal heir to Decedent 141, and resides in the *municipio* of Apartadó in the Urabá

region of Colombia. Doe 141 brings this action on behalf of Decedent 141 and on behalf of the Estate of Decedent 141.

166. On 10/5/1995, Decedent 142 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 142, who was the wife of Decedent 142, is the next of kin and legal heir to Decedent 142, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 142 brings this action on behalf of Decedent 142 and on behalf of the Estate of Decedent 142.

167. On 4/24/1995, Decedent 143 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 143, who was the wife of Decedent 143, is the next of kin and legal heir to Decedent 143, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 143 brings this action on behalf of Decedent 143 and on behalf of the Estate of Decedent 143.

168. On 6/11/1996, Decedent 144 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 144, who was the wife of Decedent 144, is the next of kin and legal heir to Decedent 144, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 144 brings this action on behalf of Decedent 144 and on behalf of the Estate of Decedent 144.

169. On 11/6/1996, Decedent 145 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 145, who was the wife of Decedent 145, is the next of kin and legal heir to Decedent 145, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 145 brings this action on behalf of Decedent 145 and on behalf of the Estate of Decedent 145.

170. On 10/20/1996, Decedent 146 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 146, who was the wife of Decedent 146, is the next of kin and legal heir to Decedent 146, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 146 brings this action on behalf of Decedent 146 and on behalf of the Estate of Decedent 146.

171. On 10/10/1995, Decedent 147 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 147, who was the wife of Decedent 147, is the next of kin and legal heir to Decedent 147, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 147 brings this action on behalf of Decedent 147 and on behalf of the Estate of Decedent 147.

172. On 1/19/1996, Decedent 148 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 148, who was the father of Decedent 148, is the next of kin and legal heir to Decedent 148, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 148 brings this action on behalf of Decedent 148 and on behalf of the Estate of Decedent 148.

173. On 6/4/1996, Decedent 149 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 149, who was the sister of Decedent 149, is the next of kin and legal heir to Decedent 149, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 149 brings this action on behalf of Decedent 149 and on behalf of the Estate of Decedent 149.

174. On 6/6/1995, Decedent 150 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 150, who was the wife of Decedent 150, is the next of kin and legal heir to Decedent 150, and resides in the *municipio* of Apartadó in the Urabá

region of Colombia. Doe 150 brings this action on behalf of Decedent 150 and on behalf of the Estate of Decedent 150.

175. On 1/10/1995, Decedent 151 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 151, who was the wife of Decedent 151, is the next of kin and legal heir to Decedent 151, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 151 brings this action on behalf of Decedent 151 and on behalf of the Estate of Decedent 151.

176. On 2/15/1996, Decedent 152 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 152, who was the wife of Decedent 152, is the next of kin and legal heir to Decedent 152, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 152 brings this action on behalf of Decedent 152 and on behalf of the Estate of Decedent 152.

177. On 12/2/1995, Decedent 153 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 153, who was the mother of Decedent 153, is the next of kin and legal heir to Decedent 153, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 153 brings this action on behalf of Decedent 153 and on behalf of the Estate of Decedent 153.

178. On 9/13/1995, Decedent 154 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 154, who was the wife of Decedent 154, is the next of kin and legal heir to Decedent 154, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 154 brings this action on behalf of Decedent 154 and on behalf of the Estate of Decedent 154.

179. On 1/28/1995, Decedent 155 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 155, who was the wife of Decedent 155, is the next of kin and legal heir to Decedent 155, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 155 brings this action on behalf of Decedent 155 and on behalf of the Estate of Decedent 155.

180. On 8/30/1996, Decedent 156 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 156, who was the wife of Decedent 156, is the next of kin and legal heir to Decedent 156, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 156 brings this action on behalf of Decedent 156 and on behalf of the Estate of Decedent 156.

181. On 1/10/1995, Decedent 157 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 157, who was the grandmother of Decedent 157, is the next of kin and legal heir to Decedent 157, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 157 brings this action on behalf of Decedent 157 and on behalf of the Estate of Decedent 157.

182. On 7/8/1995, Decedent 158 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 158, who was the wife of Decedent 158, is the next of kin and legal heir to Decedent 158, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 158 brings this action on behalf of Decedent 158 and on behalf of the Estate of Decedent 158.

183. On 8/19/1996, Decedent 159 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 159, who was the sister of Decedent 159, is the next of kin and legal heir to Decedent 159, and resides in the *municipio* of Apartadó in the Urabá

region of Colombia. Doe 159 brings this action on behalf of Decedent 159 and on behalf of the Estate of Decedent 159.

184. On 8/30/1996, Decedent 160 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 160, who was the mother of Decedent 160, is the next of kin and legal heir to Decedent 160, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 160 brings this action on behalf of Decedent 160 and on behalf of the Estate of Decedent 160.

185. On 10/14/1996, Decedent 161 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 161, who was the mother of Decedent 161, is the next of kin and legal heir to Decedent 161, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 161 brings this action on behalf of Decedent 161 and on behalf of the Estate of Decedent 161.

186. On 10/12/1996, Decedent 162 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 162, who was the wife of Decedent 162, is the next of kin and legal heir to Decedent 162, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 162 brings this action on behalf of Decedent 162 and on behalf of the Estate of Decedent 162.

187. On 1/12/1995, Decedent 163 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 163, who was the mother of Decedent 163, is the next of kin and legal heir to Decedent 163, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 163 brings this action on behalf of Decedent 163 and on behalf of the Estate of Decedent 163.

188. On 2/11/1996, Decedent 164 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 164, who was the wife of Decedent 164, is the next of kin and legal heir to Decedent 164, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 164 brings this action on behalf of Decedent 164 and on behalf of the Estate of Decedent 164.

189. On 6/25/1995, Decedent 165 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 165, who was the wife of Decedent 165, is the next of kin and legal heir to Decedent 165, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 165 brings this action on behalf of Decedent 165 and on behalf of the Estate of Decedent 165.

190. On 4/19/1995, Decedent 166 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 166, who was the wife of Decedent 166, is the next of kin and legal heir to Decedent 166, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 166 brings this action on behalf of Decedent 166 and on behalf of the Estate of Decedent 166.

191. On 8/29/1996, Decedent 167 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 167, who was the wife of Decedent 167, is the next of kin and legal heir to Decedent 167, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 167 brings this action on behalf of Decedent 167 and on behalf of the Estate of Decedent 167.

192. On 7/13/1995, Decedent 168 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 168, who was the wife of Decedent 168, is the next of kin and legal heir to Decedent 168, and resides in the *municipio* of Apartadó in the Urabá

region of Colombia. Doe 168 brings this action on behalf of Decedent 168 and on behalf of the Estate of Decedent 168.

193. On 5/16/1995, Decedent 169 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 169, who was the wife of Decedent 169, is the next of kin and legal heir to Decedent 169, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 169 brings this action on behalf of Decedent 169 and on behalf of the Estate of Decedent 169.

194. On 8/28/1996, Decedent 170 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 170, who was the wife of Decedent 170, is the next of kin and legal heir to Decedent 170, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 170 brings this action on behalf of Decedent 170 and on behalf of the Estate of Decedent 170.

195. On 3/20/1995, Decedent 171 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 171, who was the wife of Decedent 171, is the next of kin and legal heir to Decedent 171, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 171 brings this action on behalf of Decedent 171 and on behalf of the Estate of Decedent 171.

196. On 4/19/1995, Decedent 172 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 172, who was the mother of Decedent 172, is the next of kin and legal heir to Decedent 172, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 172 brings this action on behalf of Decedent 172 and on behalf of the Estate of Decedent 172.

197. On 12/18/1996, Decedent 173 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 173, who was the wife of Decedent 173, is the next of kin and legal heir to Decedent 173, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 173 brings this action on behalf of Decedent 173 and on behalf of the Estate of Decedent 173.

198. On 10/23/1996, Decedent 174 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 174, who was the wife of Decedent 174, is the next of kin and legal heir to Decedent 174, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 174 brings this action on behalf of Decedent 174 and on behalf of the Estate of Decedent 174.

199. On 6/28/1996, Decedent 175 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 175, who was the wife of Decedent 175, is the next of kin and legal heir to Decedent 175, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 175 brings this action on behalf of Decedent 175 and on behalf of the Estate of Decedent 175.

200. On 6/29/1996, Decedent 176 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 176, who was the wife of Decedent 176, is the next of kin and legal heir to Decedent 176, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 176 brings this action on behalf of Decedent 176 and on behalf of the Estate of Decedent 176.

201. On 12/26/1996, Decedent 177 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 177, who was the sister of Decedent 177, is the next of kin and legal heir to Decedent 177, and resides in the *municipio* of Apartadó in the

Urabá region of Colombia. Doe 177 brings this action on behalf of Decedent 177 and on behalf of the Estate of Decedent 177.

202. On 1/30/1996, Decedent 178 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 178, who was the wife of Decedent 178, is the next of kin and legal heir to Decedent 178, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 178 brings this action on behalf of Decedent 178 and on behalf of the Estate of Decedent 178.

203. On 1/11/1996, Decedent 179 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 179, who was the son of Decedent 179, is the next of kin and legal heir to Decedent 179, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 179 brings this action on behalf of Decedent 179 and on behalf of the Estate of Decedent 179.

204. On 3/21/1996, Decedent 180 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 180, who was the daughter of Decedent 180, is the next of kin and legal heir to Decedent 180, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 180 brings this action on behalf of Decedent 180 and on behalf of the Estate of Decedent 180.

205. On 10/11/1996, Decedent 181 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 181, who was the wife of Decedent 181, is the next of kin and legal heir to Decedent 181, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 181 brings this action on behalf of Decedent 181 and on behalf of the Estate of Decedent 181.

206. On 1/7/1996, Decedent 182 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 182, who was the wife of Decedent 182, is the next of kin and legal heir to Decedent 182, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 182 brings this action on behalf of Decedent 182 and on behalf of the Estate of Decedent 182.

207. On 1/31/1995, Decedent 183 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 183, who was the wife of Decedent 183, is the next of kin and legal heir to Decedent 183, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 183 brings this action on behalf of Decedent 183 and on behalf of the Estate of Decedent 183.

208. On 5/10/1995, Decedent 184 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 184, who was the mother of Decedent 184, is the next of kin and legal heir to Decedent 184, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 184 brings this action on behalf of Decedent 184 and on behalf of the Estate of Decedent 184.

209. On 11/30/1996, Decedent 185 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 185, who was the mother of Decedent 185, is the next of kin and legal heir to Decedent 185, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 185 brings this action on behalf of Decedent 185 and on behalf of the Estate of Decedent 185.

210. On 8/19/1995, Decedent 186 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 186, who was the wife of Decedent 186, is the next of kin and legal heir to Decedent 186, and resides in the *municipio* of Apartadó in the Urabá

region of Colombia. Doe 186 brings this action on behalf of Decedent 186 and on behalf of the Estate of Decedent 186.

211. On 8/19/1995, Decedent 187 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 187, who was the mother of Decedent 187, is the next of kin and legal heir to Decedent 187, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 187 brings this action on behalf of Decedent 187 and on behalf of the Estate of Decedent 187.

212. On 7/22/1995, Decedent 188 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 188, who was the wife of Decedent 188, is the next of kin and legal heir to Decedent 188, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 188 brings this action on behalf of Decedent 188 and on behalf of the Estate of Decedent 188.

213. On 3/1/1996, Decedent 189 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 189, who was the mother of Decedent 189, is the next of kin and legal heir to Decedent 189, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 189 brings this action on behalf of Decedent 189 and on behalf of the Estate of Decedent 189.

214. On 11/7/1996, Decedent 190 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 190, who was the wife of Decedent 190, is the next of kin and legal heir to Decedent 190, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 190 brings this action on behalf of Decedent 190 and on behalf of the Estate of Decedent 190.

215. On 11/21/1996, Decedent 191 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 191, who was the daughter of Decedent 191, is the next of kin and legal heir to Decedent 191, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 191 brings this action on behalf of Decedent 191 and on behalf of the Estate of Decedent 191.

216. On 11/6/1996, Decedent 192 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 192, who was the wife of Decedent 192, is the next of kin and legal heir to Decedent 192, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 192 brings this action on behalf of Decedent 192 and on behalf of the Estate of Decedent 192.

217. On 11/4/1996, Decedent 193 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 193, who was the mother of Decedent 193, is the next of kin and legal heir to Decedent 193, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 193 brings this action on behalf of Decedent 193 and on behalf of the Estate of Decedent 193.

218. On 6/30/1996, Decedent 194 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 194, who was the wife of Decedent 194, is the next of kin and legal heir to Decedent 194, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 194 brings this action on behalf of Decedent 194 and on behalf of the Estate of Decedent 194.

219. On 5/8/1995, Decedent 195 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 195, who was the wife of Decedent 195, is the next of kin and legal heir to Decedent 195, and resides in the *municipio* of Apartadó in the Urabá

region of Colombia. Doe 195 brings this action on behalf of Decedent 195 and on behalf of the Estate of Decedent 195.

220. On 7/15/1995, Decedent 196 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 196, who was the wife of Decedent 196, is the next of kin and legal heir to Decedent 196, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 196 brings this action on behalf of Decedent 196 and on behalf of the Estate of Decedent 196.

221. On 10/27/1996, Decedent 197 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 197, who was the wife of Decedent 197, is the next of kin and legal heir to Decedent 197, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 197 brings this action on behalf of Decedent 197 and on behalf of the Estate of Decedent 197.

222. On 1/26/1995, Decedent 198 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 198, who was the wife of Decedent 198, is the next of kin and legal heir to Decedent 198, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 198 brings this action on behalf of Decedent 198 and on behalf of the Estate of Decedent 198.

223. On 6/11/1995, Decedent 199 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 199, who was the wife of Decedent 199, is the next of kin and legal heir to Decedent 199, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 199 brings this action on behalf of Decedent 199 and on behalf of the Estate of Decedent 199.

224. On 3/15/1995, Decedent 200 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 200, who was the mother of Decedent 200, is the next of kin and legal heir to Decedent 200, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 200 brings this action on behalf of Decedent 200 and on behalf of the Estate of Decedent 200.

225. On 7/5/1995, Decedent 201 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 201, who was the wife of Decedent 201, is the next of kin and legal heir to Decedent 201, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 201 brings this action on behalf of Decedent 201 and on behalf of the Estate of Decedent 201.

226. On 9/24/1996, Decedent 202 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 202, who was the wife of Decedent 202, is the next of kin and legal heir to Decedent 202, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 202 brings this action on behalf of Decedent 202 and on behalf of the Estate of Decedent 202.

227. On 11/19/1996, Decedent 203 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 203, who was the wife of Decedent 203, is the next of kin and legal heir to Decedent 203, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 203 brings this action on behalf of Decedent 203 and on behalf of the Estate of Decedent 203.

228. On 3/3/1995, Decedent 204 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 204, who was the mother of Decedent 204, is the next of kin and legal heir to Decedent 204, and resides in the *municipio* of Apartadó in the Urabá

region of Colombia. Doe 204 brings this action on behalf of Decedent 204 and on behalf of the Estate of Decedent 204.

229. On 5/28/1995, Decedent 205 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 205, who was the wife of Decedent 205, is the next of kin and legal heir to Decedent 205, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 205 brings this action on behalf of Decedent 205 and on behalf of the Estate of Decedent 205.

230. On 7/10/1995, Decedent 206 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 206, who was the wife of Decedent 206, is the next of kin and legal heir to Decedent 206, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 206 brings this action on behalf of Decedent 206 and on behalf of the Estate of Decedent 206.

231. On 11/5/1996, Decedent 207 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 207, who was the sister of Decedent 207, is the next of kin and legal heir to Decedent 207, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 207 brings this action on behalf of Decedent 207 and on behalf of the Estate of Decedent 207.

232. On 12/19/1995, Decedent 208 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 208, who was the wife of Decedent 208, is the next of kin and legal heir to Decedent 208, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 208 brings this action on behalf of Decedent 208 and on behalf of the Estate of Decedent 208.

233. On 5/5/1995, Decedent 209 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 209, who was the wife of Decedent 209, is the next of kin and legal heir to Decedent 209, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 209 brings this action on behalf of Decedent 209 and on behalf of the Estate of Decedent 209.

234. On 12/19/1995, Decedent 210 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 210, who was the daughter of Decedent 210, is the next of kin and legal heir to Decedent 210, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 210 brings this action on behalf of Decedent 210 and on behalf of the Estate of Decedent 210.

235. On 7/27/1995, Decedent 211 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 211, who was the mother of Decedent 211, is the next of kin and legal heir to Decedent 211, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 211 brings this action on behalf of Decedent 211 and on behalf of the Estate of Decedent 211.

236. On 10/5/1995, Decedent 212 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 212, who was the wife of Decedent 212, is the next of kin and legal heir to Decedent 212, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 212 brings this action on behalf of Decedent 212 and on behalf of the Estate of Decedent 212.

237. On 9/18/1995, Decedent 213 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 213, who was the mother of Decedent 213, is the next of kin and legal heir to Decedent 213, and resides in the *municipio* of Apartadó in the Urabá

region of Colombia. Doe 213 brings this action on behalf of Decedent 213 and on behalf of the Estate of Decedent 213.

238. On 8/12/1995, Decedent 214 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 214, who was the mother of Decedent 214, is the next of kin and legal heir to Decedent 214, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 214 brings this action on behalf of Decedent 214 and on behalf of the Estate of Decedent 214.

239. On 11/1/1996, Decedent 215 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 215, who was the daughter of Decedent 215, is the next of kin and legal heir to Decedent 215, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 215 brings this action on behalf of Decedent 215 and on behalf of the Estate of Decedent 215.

240. On 10/22/1995, Decedent 216 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 216, who was the wife of Decedent 216, is the next of kin and legal heir to Decedent 216, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 216 brings this action on behalf of Decedent 216 and on behalf of the Estate of Decedent 216.

241. On 11/16/1996, Decedent 217 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 217, who was the wife of Decedent 217, is the next of kin and legal heir to Decedent 217, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 217 brings this action on behalf of Decedent 217 and on behalf of the Estate of Decedent 217.

242. On 9/8/1995, Decedent 218 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 218, who was the wife of Decedent 218, is the next of kin and legal heir to Decedent 218, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 218 brings this action on behalf of Decedent 218 and on behalf of the Estate of Decedent 218.

243. On 7/12/1996, Decedent 219 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 219, who was the son of Decedent 219, is the next of kin and legal heir to Decedent 219, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 219 brings this action on behalf of Decedent 219 and on behalf of the Estate of Decedent 219.

244. On 7/17/1996, Decedent 220 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 220, who was the wife of Decedent 220, is the next of kin and legal heir to Decedent 220, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 220 brings this action on behalf of Decedent 220 and on behalf of the Estate of Decedent 220.

245. On 7/10/1995, Decedent 221 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 221, who was the mother of Decedent 221, is the next of kin and legal heir to Decedent 221, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 221 brings this action on behalf of Decedent 221 and on behalf of the Estate of Decedent 221.

246. On 7/18/1996, Decedent 222 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 222, who was the wife of Decedent 222, is the next of kin and legal heir to Decedent 222, and resides in the *municipio* of Apartadó in the Urabá

region of Colombia. Doe 222 brings this action on behalf of Decedent 222 and on behalf of the Estate of Decedent 222.

247. On 1/14/1996, Decedent 223 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 223, who was the mother of Decedent 223, is the next of kin and legal heir to Decedent 223, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 223 brings this action on behalf of Decedent 223 and on behalf of the Estate of Decedent 223.

248. On 8/23/1995, Decedent 224 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 224, who was the sister of Decedent 224, is the next of kin and legal heir to Decedent 224, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 224 brings this action on behalf of Decedent 224 and on behalf of the Estate of Decedent 224.

249. On 11/16/1996, Decedent 225 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 225, who was the wife of Decedent 225, is the next of kin and legal heir to Decedent 225, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 225 brings this action on behalf of Decedent 225 and on behalf of the Estate of Decedent 225.

250. On 4/20/1996, Decedent 226 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 226, who was the mother of Decedent 226, is the next of kin and legal heir to Decedent 226, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 226 brings this action on behalf of Decedent 226 and on behalf of the Estate of Decedent 226.

251. On 9/27/1995, Decedent 227 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 227, who was the wife of Decedent 227, is the next of kin and legal heir to Decedent 227, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 227 brings this action on behalf of Decedent 227 and on behalf of the Estate of Decedent 227.

252. On 11/20/1996, Decedent 228 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 228, who was the wife of Decedent 228, is the next of kin and legal heir to Decedent 228, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 228 brings this action on behalf of Decedent 228 and on behalf of the Estate of Decedent 228.

253. On 9/14/1995, Decedent 229 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 229, who was the sister of Decedent 229, is the next of kin and legal heir to Decedent 229, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 229 brings this action on behalf of Decedent 229 and on behalf of the Estate of Decedent 229.

254. On 10/22/1996, Decedent 230 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 230, who was the mother of Decedent 230, is the next of kin and legal heir to Decedent 230, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 230 brings this action on behalf of Decedent 230 and on behalf of the Estate of Decedent 230.

255. On 5/17/1996, Decedent 231 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 231, who was the wife of Decedent 231, is the next of kin and legal heir to Decedent 231, and resides in the *municipio* of Apartadó in the Urabá

region of Colombia. Doe 231 brings this action on behalf of Decedent 231 and on behalf of the Estate of Decedent 231.

256. On 10/29/1995, Decedent 232 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 232, who was the mother of Decedent 232, is the next of kin and legal heir to Decedent 232, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 232 brings this action on behalf of Decedent 232 and on behalf of the Estate of Decedent 232.

257. On 4/16/1997, Decedent 233 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 233, who was the wife of Decedent 233, is the next of kin and legal heir to Decedent 233, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 233 brings this action on behalf of Decedent 233 and on behalf of the Estate of Decedent 233.

258. On 4/17/1997, Decedent 234 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 234, who was the wife of Decedent 234, is the next of kin and legal heir to Decedent 234, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 234 brings this action on behalf of Decedent 234 and on behalf of the Estate of Decedent 234.

259. On 5/3/1996, Decedent 235 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 235, who was the wife of Decedent 235, is the next of kin and legal heir to Decedent 235, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 235 brings this action on behalf of Decedent 235 and on behalf of the Estate of Decedent 235.

260. On 11/23/1995, Decedent 236 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 236, who was the wife of Decedent 236, is the next of kin and legal heir to Decedent 236, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 236 brings this action on behalf of Decedent 236 and on behalf of the Estate of Decedent 236.

261. On 7/28/1996, Decedent 237 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 237, who was the wife of Decedent 237, is the next of kin and legal heir to Decedent 237, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 237 brings this action on behalf of Decedent 237 and on behalf of the Estate of Decedent 237.

262. On 9/15/1996, Decedent 238 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 238, who was the mother of Decedent 238, is the next of kin and legal heir to Decedent 238, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 238 brings this action on behalf of Decedent 238 and on behalf of the Estate of Decedent 238.

263. On 10/22/1996, Decedent 239 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 239, who was the mother of Decedent 239, is the next of kin and legal heir to Decedent 239, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 239 brings this action on behalf of Decedent 239 and on behalf of the Estate of Decedent 239.

264. On 12/2/1995, Decedent 240 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 240, who was the sister of Decedent 240, is the next of kin and legal heir to Decedent 240, and resides in the *municipio* of Apartadó in the Urabá

region of Colombia. Doe 240 brings this action on behalf of Decedent 240 and on behalf of the Estate of Decedent 240.

265. On 10/20/1996, Decedent 241 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 241, who was the daughter of Decedent 241, is the next of kin and legal heir to Decedent 241, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 241 brings this action on behalf of Decedent 241 and on behalf of the Estate of Decedent 241.

266. On 10/21/1996, Decedent 242 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 242, who was the father of Decedent 242, is the next of kin and legal heir to Decedent 242, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 242 brings this action on behalf of Decedent 242 and on behalf of the Estate of Decedent 242.

267. On 11/3/1995, Decedent 243 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 243, who was the mother of Decedent 243, is the next of kin and legal heir to Decedent 243, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 243 brings this action on behalf of Decedent 243 and on behalf of the Estate of Decedent 243.

268. On 6/4/1995, Decedent 244 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 244, who was the wife of Decedent 244, is the next of kin and legal heir to Decedent 244, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 244 brings this action on behalf of Decedent 244 and on behalf of the Estate of Decedent 244.

269. On 5/19/1995, Decedent 245 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 245, who was the wife of Decedent 245, is the next of kin and legal heir to Decedent 245, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 245 brings this action on behalf of Decedent 245 and on behalf of the Estate of Decedent 245.

270. On 9/7/1995, Decedent 246 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 246, who was the wife of Decedent 246, is the next of kin and legal heir to Decedent 246, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 246 brings this action on behalf of Decedent 246 and on behalf of the Estate of Decedent 246.

271. On 4/22/1996, Decedent 247 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 247, who was the wife of Decedent 247, is the next of kin and legal heir to Decedent 247, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 247 brings this action on behalf of Decedent 247 and on behalf of the Estate of Decedent 247.

272. On 7/24/1995, Decedent 248 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 248, who was the wife of Decedent 248, is the next of kin and legal heir to Decedent 248, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 248 brings this action on behalf of Decedent 248 and on behalf of the Estate of Decedent 248.

273. On 10/29/1995, Decedent 249 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 249, who was the wife of Decedent 249, is the next of kin and legal heir to Decedent 249, and resides in the *municipio* of Apartadó in the

Urabá region of Colombia. Doe 249 brings this action on behalf of Decedent 249 and on behalf of the Estate of Decedent 249.

274. On 8/26/1996, Decedent 250 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 250, who was the mother of Decedent 250, is the next of kin and legal heir to Decedent 250, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 250 brings this action on behalf of Decedent 250 and on behalf of the Estate of Decedent 250.

275. On 11/27/1996, Decedent 251 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 251, who was the wife of Decedent 251, is the next of kin and legal heir to Decedent 251, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 251 brings this action on behalf of Decedent 251 and on behalf of the Estate of Decedent 251.

276. On 2/21/1996, Decedent 252 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 252, who was the sister of Decedent 252, is the next of kin and legal heir to Decedent 252, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 252 brings this action on behalf of Decedent 252 and on behalf of the Estate of Decedent 252.

277. On 8/24/1996, Decedent 253 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 253, who was the wife of Decedent 253, is the next of kin and legal heir to Decedent 253, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 253 brings this action on behalf of Decedent 253 and on behalf of the Estate of Decedent 253.

278. On 10/12/1996, Decedent 254 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 254, who was the wife of Decedent 254, is the next of kin and legal heir to Decedent 254, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 254 brings this action on behalf of Decedent 254 and on behalf of the Estate of Decedent 254.

279. On 10/4/1996, Decedent 255 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 255, who was the wife of Decedent 255, is the next of kin and legal heir to Decedent 255, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 255 brings this action on behalf of Decedent 255 and on behalf of the Estate of Decedent 255.

280. On 3/5/1995, Decedent 256 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 256, who was the brother of Decedent 256, is the next of kin and legal heir to Decedent 256, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 256 brings this action on behalf of Decedent 256 and on behalf of the Estate of Decedent 256.

281. On 5/6/1996, Decedent 257 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 257, who was the brother of Decedent 257, is the next of kin and legal heir to Decedent 257, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 257 brings this action on behalf of Decedent 257 and on behalf of the Estate of Decedent 257.

282. On 8/4/1996, Decedent 258 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 258, who was the father of Decedent 258, is the next of kin and legal heir to Decedent 258, and resides in the *municipio* of Apartadó in the Urabá

region of Colombia. Doe 258 brings this action on behalf of Decedent 258 and on behalf of the Estate of Decedent 258.

283. On 11/12/1995, Decedent 259 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 259, who was the daughter of Decedent 259, is the next of kin and legal heir to Decedent 259, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 259 brings this action on behalf of Decedent 259 and on behalf of the Estate of Decedent 259.

284. On 11/4/1996, Decedent 260 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 260, who was the wife of Decedent 260, is the next of kin and legal heir to Decedent 260, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 260 brings this action on behalf of Decedent 260 and on behalf of the Estate of Decedent 260.

285. On 8/31/1995, Decedent 261 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 261, who was the wife of Decedent 261, is the next of kin and legal heir to Decedent 261, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 261 brings this action on behalf of Decedent 261 and on behalf of the Estate of Decedent 261.

286. On 3/9/1996, Decedent 262 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 262, who was the mother of Decedent 262, is the next of kin and legal heir to Decedent 262, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 262 brings this action on behalf of Decedent 262 and on behalf of the Estate of Decedent 262.

287. On 10/12/1996, Decedent 263 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 263, who was the wife of Decedent 263, is the next of kin and legal heir to Decedent 263, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 263 brings this action on behalf of Decedent 263 and on behalf of the Estate of Decedent 263.

288. On 2/19/1996, Decedent 264 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 264, who was the wife of Decedent 264, is the next of kin and legal heir to Decedent 264, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 264 brings this action on behalf of Decedent 264 and on behalf of the Estate of Decedent 264.

289. On 9/26/1996, Decedent 265 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 265, who was the wife of Decedent 265, is the next of kin and legal heir to Decedent 265, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 265 brings this action on behalf of Decedent 265 and on behalf of the Estate of Decedent 265.

290. On 4/3/1996, Decedent 266 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 266, who was the wife of Decedent 266, is the next of kin and legal heir to Decedent 266, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 266 brings this action on behalf of Decedent 266 and on behalf of the Estate of Decedent 266.

291. On 5/19/1996, Decedent 267 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 267, who was the mother of Decedent 267, is the next of kin and legal heir to Decedent 267, and resides in the *municipio* of Apartadó in the Urabá

region of Colombia. Doe 267 brings this action on behalf of Decedent 267 and on behalf of the Estate of Decedent 267.

292. On 9/5/1996, Decedent 268 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 268, who was the wife of Decedent 268, is the next of kin and legal heir to Decedent 268, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 268 brings this action on behalf of Decedent 268 and on behalf of the Estate of Decedent 268.

293. On 2/18/1995, Decedent 269 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 269, who was the mother of Decedent 269, is the next of kin and legal heir to Decedent 269, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 269 brings this action on behalf of Decedent 269 and on behalf of the Estate of Decedent 269.

294. On 5/12/1995, Decedent 270 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 270, who was the wife of Decedent 270, is the next of kin and legal heir to Decedent 270, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 270 brings this action on behalf of Decedent 270 and on behalf of the Estate of Decedent 270.

295. On 4/23/1996, Decedent 271 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 271, who was the mother of Decedent 271, is the next of kin and legal heir to Decedent 271, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 271 brings this action on behalf of Decedent 271 and on behalf of the Estate of Decedent 271.

296. On 4/15/1995, Decedent 272 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 272, who was the mother of Decedent 272, is the next of kin and legal heir to Decedent 272, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 272 brings this action on behalf of Decedent 272 and on behalf of the Estate of Decedent 272.

297. On 4/3/1996, Decedent 273 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 273, who was the mother of Decedent 273, is the next of kin and legal heir to Decedent 273, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 273 brings this action on behalf of Decedent 273 and on behalf of the Estate of Decedent 273.

298. On 12/10/1996, Decedent 274 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 274, who was the mother of Decedent 274, is the next of kin and legal heir to Decedent 274, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 274 brings this action on behalf of Decedent 274 and on behalf of the Estate of Decedent 274.

299. On 12/30/1996, Decedent 275 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 275, who was the wife of Decedent 275, is the next of kin and legal heir to Decedent 275, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 275 brings this action on behalf of Decedent 275 and on behalf of the Estate of Decedent 275.

300. On 8/5/1996, Decedent 276 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 276, who was the mother of Decedent 276, is the next of kin and legal heir to Decedent 276, and resides in the *municipio* of Apartadó in the Urabá

region of Colombia. Doe 276 brings this action on behalf of Decedent 276 and on behalf of the Estate of Decedent 276.

301. On 9/18/1996, Decedent 277 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 277, who was the wife of Decedent 277, is the next of kin and legal heir to Decedent 277, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 277 brings this action on behalf of Decedent 277 and on behalf of the Estate of Decedent 277.

302. On 10/12/1996, Decedent 278 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 278, who was the wife of Decedent 278, is the next of kin and legal heir to Decedent 278, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 278 brings this action on behalf of Decedent 278 and on behalf of the Estate of Decedent 278.

303. On 11/24/1995, Decedent 279 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 279, who was the wife of Decedent 279, is the next of kin and legal heir to Decedent 279, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 279 brings this action on behalf of Decedent 279 and on behalf of the Estate of Decedent 279.

304. On 8/11/1995, Decedent 280 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 280, who was the wife of Decedent 280, is the next of kin and legal heir to Decedent 280, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 280 brings this action on behalf of Decedent 280 and on behalf of the Estate of Decedent 280.

305. On 8/21/1996, Decedent 281 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 281, who was the sister of Decedent 281, is the next of kin and legal heir to Decedent 281, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 281 brings this action on behalf of Decedent 281 and on behalf of the Estate of Decedent 281.

306. On 4/9/1995, Decedent 282 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 282, who was the sister of Decedent 282, is the next of kin and legal heir to Decedent 282, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 282 brings this action on behalf of Decedent 282 and on behalf of the Estate of Decedent 282.

307. On 11/15/1996, Decedent 283 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 283, who was the mother of Decedent 283, is the next of kin and legal heir to Decedent 283, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 283 brings this action on behalf of Decedent 283 and on behalf of the Estate of Decedent 283.

308. On 8/9/1996, Decedent 284 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 284, who was the daughter of Decedent 284, is the next of kin and legal heir to Decedent 284, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 284 brings this action on behalf of Decedent 284 and on behalf of the Estate of Decedent 284.

309. On 6/22/1995, Decedent 285 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 285, who was the wife of Decedent 285, is the next of kin and legal heir to Decedent 285, and resides in the *municipio* of Apartadó in the Urabá

region of Colombia. Doe 285 brings this action on behalf of Decedent 285 and on behalf of the Estate of Decedent 285.

310. On 1/28/1996, Decedent 286 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 286, who was the wife of Decedent 286, is the next of kin and legal heir to Decedent 286, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 286 brings this action on behalf of Decedent 286 and on behalf of the Estate of Decedent 286.

311. On 10/29/1995, Decedent 287 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 287, who was the mother of Decedent 287, is the next of kin and legal heir to Decedent 287, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 287 brings this action on behalf of Decedent 287 and on behalf of the Estate of Decedent 287.

312. On 11/1/1996, Decedent 288 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 288, who was the mother of Decedent 288, is the next of kin and legal heir to Decedent 288, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 288 brings this action on behalf of Decedent 288 and on behalf of the Estate of Decedent 288.

313. On 8/15/1996, Decedent 289 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 289, who was the wife of Decedent 289, is the next of kin and legal heir to Decedent 289, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 289 brings this action on behalf of Decedent 289 and on behalf of the Estate of Decedent 289.

314. On 11/4/1996, Decedent 290 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 290, who was the wife of Decedent 290, is the next of kin and legal heir to Decedent 290, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 290 brings this action on behalf of Decedent 290 and on behalf of the Estate of Decedent 290.

315. On 4/19/1996, Decedent 291 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 291, who was the sister of Decedent 291, is the next of kin and legal heir to Decedent 291, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 291 brings this action on behalf of Decedent 291 and on behalf of the Estate of Decedent 291.

316. On 4/4/1996, Decedent 292 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 292, who was the mother of Decedent 292, is the next of kin and legal heir to Decedent 292, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 292 brings this action on behalf of Decedent 292 and on behalf of the Estate of Decedent 292.

317. On 9/10/1996, Decedent 293 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 293, who was the daughter of Decedent 293, is the next of kin and legal heir to Decedent 293, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 293 brings this action on behalf of Decedent 293 and on behalf of the Estate of Decedent 293.

318. In March of 1996, Decedent 294 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 294, who was the mother of Decedent 294, is the next of kin and legal heir to Decedent 294, and resides in the *municipio* of Apartadó in

the Urabá region of Colombia. Doe 294 brings this action on behalf of Decedent 294 and on behalf of the Estate of Decedent 294.

319. On 7/15/1996, Decedent 295 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 295, who was the wife of Decedent 295, is the next of kin and legal heir to Decedent 295, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 295 brings this action on behalf of Decedent 295 and on behalf of the Estate of Decedent 295.

320. On 10/24/1996, Decedent 296 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 296, who was the wife of Decedent 296, is the next of kin and legal heir to Decedent 296, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 296 brings this action on behalf of Decedent 296 and on behalf of the Estate of Decedent 296.

321. On 9/20/1995, Decedent 297 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 297, who was the wife of Decedent 297, is the next of kin and legal heir to Decedent 297, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 297 brings this action on behalf of Decedent 297 and on behalf of the Estate of Decedent 297.

322. On 2/2/1996, Decedent 298 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 298, who was the wife of Decedent 298, is the next of kin and legal heir to Decedent 298, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 298 brings this action on behalf of Decedent 298 and on behalf of the Estate of Decedent 298.

323. On 12/19/1995, Decedent 299 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 299, who was the mother of Decedent 299, is the next of kin and legal heir to Decedent 299, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 299 brings this action on behalf of Decedent 299 and on behalf of the Estate of Decedent 299.

324. On 12/13/1995, Decedent 300 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 300, who was the sister of Decedent 300, is the next of kin and legal heir to Decedent 300, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 300 brings this action on behalf of Decedent 300 and on behalf of the Estate of Decedent 300.

325. On 7/2/1995, Decedent 301 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 301, who was the sister of Decedent 301, is the next of kin and legal heir to Decedent 301, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 301 brings this action on behalf of Decedent 301 and on behalf of the Estate of Decedent 301.

326. On 4/22/1996, Decedent 302 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 302, who was the wife of Decedent 302, is the next of kin and legal heir to Decedent 302, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 302 brings this action on behalf of Decedent 302 and on behalf of the Estate of Decedent 302.

327. On 6/1/1995, Decedent 303 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 303, who was the wife of Decedent 303, is the next of kin and legal heir to Decedent 303, and resides in the *municipio* of Apartadó in the Urabá

region of Colombia. Doe 303 brings this action on behalf of Decedent 303 and on behalf of the Estate of Decedent 303.

328. On 3/11/1995, Decedent 304 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 304, who was the wife of Decedent 304, is the next of kin and legal heir to Decedent 304, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 304 brings this action on behalf of Decedent 304 and on behalf of the Estate of Decedent 304.

329. On 5/23/1995, Decedent 305 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 305, who was the wife of Decedent 305, is the next of kin and legal heir to Decedent 305, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 305 brings this action on behalf of Decedent 305 and on behalf of the Estate of Decedent 305.

330. On 5/23/1995, Decedent 306 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 306, who was the wife of Decedent 306, is the next of kin and legal heir to Decedent 306, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 306 brings this action on behalf of Decedent 306 and on behalf of the Estate of Decedent 306.

331. On 6/6/1996, Decedent 307 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 307, who was the wife of Decedent 307, is the next of kin and legal heir to Decedent 307, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 307 brings this action on behalf of Decedent 307 and on behalf of the Estate of Decedent 307.

332. On 3/12/1995, Decedent 308 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 308, who was the mother of Decedent 308, is the next of kin and legal heir to Decedent 308, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 308 brings this action on behalf of Decedent 308 and on behalf of the Estate of Decedent 308.

333. On 3/12/1995, Decedent 309 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 309, who was the mother of Decedent 309, is the next of kin and legal heir to Decedent 309, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 309 brings this action on behalf of Decedent 309 and on behalf of the Estate of Decedent 309.

334. On 11/18/1995, Decedent 310 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 310, who was the wife of Decedent 310, is the next of kin and legal heir to Decedent 310, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 310 brings this action on behalf of Decedent 310 and on behalf of the Estate of Decedent 310.

335. On 2/14/1996, Decedent 311 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 311, who was the wife of Decedent 311, is the next of kin and legal heir to Decedent 311, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 311 brings this action on behalf of Decedent 311 and on behalf of the Estate of Decedent 311.

336. On 8/19/1995, Decedent 312 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 312, who was the wife of Decedent 312, is the next of kin and legal heir to Decedent 312, and resides in the *municipio* of Apartadó in the Urabá

region of Colombia. Doe 312 brings this action on behalf of Decedent 312 and on behalf of the Estate of Decedent 312.

337. On 1/23/1996, Decedent 313 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 313, who was the wife of Decedent 313, is the next of kin and legal heir to Decedent 313, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 313 brings this action on behalf of Decedent 313 and on behalf of the Estate of Decedent 313.

338. On 5/13/1996, Decedent 314 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 314, who was the wife of Decedent 314, is the next of kin and legal heir to Decedent 314, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 314 brings this action on behalf of Decedent 314 and on behalf of the Estate of Decedent 314.

339. On 12/9/1995, Decedent 315 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 315, who was the mother of Decedent 315, is the next of kin and legal heir to Decedent 315, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 315 brings this action on behalf of Decedent 315 and on behalf of the Estate of Decedent 315.

340. On 7/3/1995, Decedent 316 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 316, who was the mother of Decedent 316, is the next of kin and legal heir to Decedent 316, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 316 brings this action on behalf of Decedent 316 and on behalf of the Estate of Decedent 316.

341. On 12/11/1996, Decedent 317 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 317, who was the mother of Decedent 317, is the next of kin and legal heir to Decedent 317, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 317 brings this action on behalf of Decedent 317 and on behalf of the Estate of Decedent 317.

342. On 9/30/1996, Decedent 318 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 318, who was the wife of Decedent 318, is the next of kin and legal heir to Decedent 318, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 318 brings this action on behalf of Decedent 318 and on behalf of the Estate of Decedent 318.

343. On 7/30/1996, Decedent 319 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 319, who was the wife of Decedent 319, is the next of kin and legal heir to Decedent 319, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 319 brings this action on behalf of Decedent 319 and on behalf of the Estate of Decedent 319.

344. On 1/22/1996, Decedent 320 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 320, who was the mother of Decedent 320, is the next of kin and legal heir to Decedent 320, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 320 brings this action on behalf of Decedent 320 and on behalf of the Estate of Decedent 320.

345. On 7/30/1996, Decedent 321 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 321, who was the mother of Decedent 321, is the next of kin and legal heir to Decedent 321, and resides in the *municipio* of Apartadó in the Urabá

region of Colombia. Doe 321 brings this action on behalf of Decedent 321 and on behalf of the Estate of Decedent 321.

346. On 5/31/1995, Decedent 322 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 322, who was the wife of Decedent 322, is the next of kin and legal heir to Decedent 322, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 322 brings this action on behalf of Decedent 322 and on behalf of the Estate of Decedent 322.

347. On 7/5/1996, Decedent 323 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 323, who was the mother of Decedent 323, is the next of kin and legal heir to Decedent 323, and resides in the *municipio* of Apartadó in the Urabá region of Colombia. Doe 323 brings this action on behalf of Decedent 323 and on behalf of the Estate of Decedent 323.

348. On 4/20/1996, Decedent 324 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 324, who was the wife of Decedent 324, is the next of kin and legal heir to Decedent 324, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 324 brings this action on behalf of Decedent 324 and on behalf of the Estate of Decedent 324.

349. On 11/28/1996, Decedent 325 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 325, who was the wife of Decedent 325, is the next of kin and legal heir to Decedent 325, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 325 brings this action on behalf of Decedent 325 and on behalf of the Estate of Decedent 325.

350. On 11/13/1996, Decedent 326 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 326, who was the mother of Decedent 326, is the next of kin and legal heir to Decedent 326, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 326 brings this action on behalf of Decedent 326 and on behalf of the Estate of Decedent 326.

351. On 9/25/1996, Decedent 327 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 327, who was the sister of Decedent 327, is the next of kin and legal heir to Decedent 327, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 327 brings this action on behalf of Decedent 327 and on behalf of the Estate of Decedent 327.

352. On 8/13/1996, Decedent 328 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 328, who was the wife of Decedent 328, is the next of kin and legal heir to Decedent 328, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 328 brings this action on behalf of Decedent 328 and on behalf of the Estate of Decedent 328.

353. On 7/8/1995, Decedent 329 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 329, who was the sister of Decedent 329, is the next of kin and legal heir to Decedent 329, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 329 brings this action on behalf of Decedent 329 and on behalf of the Estate of Decedent 329.

354. On 2/1/1996, Decedent 330 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 330, who was the wife of Decedent 330, is the next of kin and legal heir to Decedent 330, and resides in the *municipio* of Chigorodó in the Urabá

region of Colombia. Doe 330 brings this action on behalf of Decedent 330 and on behalf of the Estate of Decedent 330.

355. On 10/15/1996, Decedent 331 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 331, who was the wife of Decedent 331, is the next of kin and legal heir to Decedent 331, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 331 brings this action on behalf of Decedent 331 and on behalf of the Estate of Decedent 331.

356. On 8/6/1995, Decedent 332 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 332, who was the mother of Decedent 332, is the next of kin and legal heir to Decedent 332, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 332 brings this action on behalf of Decedent 332 and on behalf of the Estate of Decedent 332.

357. On 8/1/1996, Decedent 333 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 333, who was the mother of Decedent 333, is the next of kin and legal heir to Decedent 333, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 333 brings this action on behalf of Decedent 333 and on behalf of the Estate of Decedent 333.

358. On 7/24/1995, Decedent 334 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 334, who was the wife of Decedent 334, is the next of kin and legal heir to Decedent 334, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 334 brings this action on behalf of Decedent 334 and on behalf of the Estate of Decedent 334.

359. On 11/19/1996, Decedent 335 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 335, who was the mother of Decedent 335, is the next of kin and legal heir to Decedent 335, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 335 brings this action on behalf of Decedent 335 and on behalf of the Estate of Decedent 335.

360. On 12/28/1996, Decedent 336 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 336, who was the wife of Decedent 336, is the next of kin and legal heir to Decedent 336, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 336 brings this action on behalf of Decedent 336 and on behalf of the Estate of Decedent 336.

361. On 11/29/1996, Decedent 337 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 337, who was the wife of Decedent 337, is the next of kin and legal heir to Decedent 337, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 337 brings this action on behalf of Decedent 337 and on behalf of the Estate of Decedent 337.

362. On 1/19/1995, Decedent 338 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 338, who was the wife of Decedent 338, is the next of kin and legal heir to Decedent 338, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 338 brings this action on behalf of Decedent 338 and on behalf of the Estate of Decedent 338.

363. On 7/31/1996, Decedent 339 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 339, who was the mother of Decedent 339, is the next of kin and legal heir to Decedent 339, and resides in the *municipio* of Chigorodó in the

Urabá region of Colombia. Doe 339 brings this action on behalf of Decedent 339 and on behalf of the Estate of Decedent 339.

364. On 11/23/1996, Decedent 340 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 340, who was the wife of Decedent 340, is the next of kin and legal heir to Decedent 340, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 340 brings this action on behalf of Decedent 340 and on behalf of the Estate of Decedent 340.

365. On 8/12/1995, Decedent 341 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 341, who was the mother of Decedent 341, is the next of kin and legal heir to Decedent 341, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 341 brings this action on behalf of Decedent 341 and on behalf of the Estate of Decedent 341.

366. On 8/12/1995, Decedent 342 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 342, who was the mother of Decedent 342, is the next of kin and legal heir to Decedent 342, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 342 brings this action on behalf of Decedent 342 and on behalf of the Estate of Decedent 342.

367. On 7/17/1995, Decedent 343 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 343, who was the wife of Decedent 343, is the next of kin and legal heir to Decedent 343, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 343 brings this action on behalf of Decedent 343 and on behalf of the Estate of Decedent 343.

368. On 4/28/1995, Decedent 344 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 344, who was the sister of Decedent 344, is the next of kin and legal heir to Decedent 344, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 344 brings this action on behalf of Decedent 344 and on behalf of the Estate of Decedent 344.

369. On 3/19/1996, Decedent 345 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 345, who was the wife of Decedent 345, is the next of kin and legal heir to Decedent 345, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 345 brings this action on behalf of Decedent 345 and on behalf of the Estate of Decedent 345.

370. On 10/17/1996, Decedent 346 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 346, who was the wife of Decedent 346, is the next of kin and legal heir to Decedent 346, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 346 brings this action on behalf of Decedent 346 and on behalf of the Estate of Decedent 346.

371. On 12/26/1996, Decedent 347 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 347, who was the wife of Decedent 347, is the next of kin and legal heir to Decedent 347, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 347 brings this action on behalf of Decedent 347 and on behalf of the Estate of Decedent 347.

372. On 9/30/1996, Decedent 348 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 348, who was the daughter of Decedent 348, is the next of kin and legal heir to Decedent 348, and resides in the *municipio* of Chigorodó in the

Urabá region of Colombia. Doe 348 brings this action on behalf of Decedent 348 and on behalf of the Estate of Decedent 348.

373. On 8/27/1995, Decedent 349 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 349, who was the wife of Decedent 349, is the next of kin and legal heir to Decedent 349, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 349 brings this action on behalf of Decedent 349 and on behalf of the Estate of Decedent 349.

374. On 6/24/1996, Decedent 350 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 350, who was the wife of Decedent 350, is the next of kin and legal heir to Decedent 350, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 350 brings this action on behalf of Decedent 350 and on behalf of the Estate of Decedent 350.

375. On 8/22/1995, Decedent 351 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 351, who was the wife of Decedent 351, is the next of kin and legal heir to Decedent 351, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 351 brings this action on behalf of Decedent 351 and on behalf of the Estate of Decedent 351.

376. On 7/21/1996, Decedent 352 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 352, who was the mother of Decedent 352, is the next of kin and legal heir to Decedent 352, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 352 brings this action on behalf of Decedent 352 and on behalf of the Estate of Decedent 352.

377. On 8/12/1995, Decedent 353 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 353, who was the wife of Decedent 353, is the next of kin and legal heir to Decedent 353, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 353 brings this action on behalf of Decedent 353 and on behalf of the Estate of Decedent 353.

378. On 8/26/1996, Decedent 354 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 354, who was the wife of Decedent 354, is the next of kin and legal heir to Decedent 354, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 354 brings this action on behalf of Decedent 354 and on behalf of the Estate of Decedent 354.

379. On 6/29/1996, Decedent 355 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 355, who was the daughter of Decedent 355, is the next of kin and legal heir to Decedent 355, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 355 brings this action on behalf of Decedent 355 and on behalf of the Estate of Decedent 355.

380. On 8/6/1996, Decedent 356 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 356, who was the wife of Decedent 356, is the next of kin and legal heir to Decedent 356, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 356 brings this action on behalf of Decedent 356 and on behalf of the Estate of Decedent 356.

381. On 5/3/1996, Decedent 357 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 357, who was the wife of Decedent 357, is the next of kin and legal heir to Decedent 357, and resides in the *municipio* of Chigorodó in the Urabá

region of Colombia. Doe 357 brings this action on behalf of Decedent 357 and on behalf of the Estate of Decedent 357.

382. On 2/4/1995, Decedent 358 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 358, who was the brother of Decedent 358, is the next of kin and legal heir to Decedent 358, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 358 brings this action on behalf of Decedent 358 and on behalf of the Estate of Decedent 358.

383. On 12/5/1996, Decedent 359 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 359, who was the mother of Decedent 359, is the next of kin and legal heir to Decedent 359, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 359 brings this action on behalf of Decedent 359 and on behalf of the Estate of Decedent 359.

384. On 4/11/1996, Decedent 360 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 360, who was the wife of Decedent 360, is the next of kin and legal heir to Decedent 360, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 360 brings this action on behalf of Decedent 360 and on behalf of the Estate of Decedent 360.

385. On 10/2/1995, Decedent 361 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 361, who was the daughter of Decedent 361, is the next of kin and legal heir to Decedent 361, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 361 brings this action on behalf of Decedent 361 and on behalf of the Estate of Decedent 361.

386. On 12/27/1995, Decedent 362 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 362, who was the mother of Decedent 362, is the next of kin and legal heir to Decedent 362, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 362 brings this action on behalf of Decedent 362 and on behalf of the Estate of Decedent 362.

387. On 4/19/1995, Decedent 363 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 363, who was the wife of Decedent 363, is the next of kin and legal heir to Decedent 363, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 363 brings this action on behalf of Decedent 363 and on behalf of the Estate of Decedent 363.

388. On 9/16/1996, Decedent 364 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 364, who was the mother of Decedent 364, is the next of kin and legal heir to Decedent 364, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 364 brings this action on behalf of Decedent 364 and on behalf of the Estate of Decedent 364.

389. On 12/4/1996, Decedent 365 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 365, who was the daughter of Decedent 365, is the next of kin and legal heir to Decedent 365, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 365 brings this action on behalf of Decedent 365 and on behalf of the Estate of Decedent 365.

390. On 8/25/1995, Decedent 366 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 366, who was the wife of Decedent 366, is the next of kin and legal heir to Decedent 366, and resides in the *municipio* of Chigorodó in the Urabá

region of Colombia. Doe 366 brings this action on behalf of Decedent 366 and on behalf of the Estate of Decedent 366.

391. On 5/13/1995, Decedent 367 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 367, who was the sister of Decedent 367, is the next of kin and legal heir to Decedent 367, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 367 brings this action on behalf of Decedent 367 and on behalf of the Estate of Decedent 367.

392. On 8/12/1995, Decedent 368 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 368, who was the wife of Decedent 368, is the next of kin and legal heir to Decedent 368, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 368 brings this action on behalf of Decedent 368 and on behalf of the Estate of Decedent 368.

393. In 1995, Decedent 369 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 369, who was the mother of Decedent 369, is the next of kin and legal heir to Decedent 369, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 369 brings this action on behalf of Decedent 369 and on behalf of the Estate of Decedent 369.

394. On 4/18/1995, Decedent 370 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 370, who was the wife of Decedent 370, is the next of kin and legal heir to Decedent 370, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 370 brings this action on behalf of Decedent 370 and on behalf of the Estate of Decedent 370.

395. On 8/15/1995, Decedent 371 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 371, who was the daughter of Decedent 371, is the next of kin and legal heir to Decedent 371, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 371 brings this action on behalf of Decedent 371 and on behalf of the Estate of Decedent 371.

396. On 7/19/1996, Decedent 372 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 372, who was the wife of Decedent 372, is the next of kin and legal heir to Decedent 372, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 372 brings this action on behalf of Decedent 372 and on behalf of the Estate of Decedent 372.

397. In February of 1996, Decedent 373 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 373, who was the daughter of Decedent 373, is the next of kin and legal heir to Decedent 373, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 373 brings this action on behalf of Decedent 373 and on behalf of the Estate of Decedent 373.

398. On 7/31/1996, Decedent 374 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 374, who was the wife of Decedent 374, is the next of kin and legal heir to Decedent 374, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 374 brings this action on behalf of Decedent 374 and on behalf of the Estate of Decedent 374.

399. On 5/28/1996, Decedent 375 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 375, who was the wife of Decedent 375, is the next of kin and legal heir to Decedent 375, and resides in the *municipio* of Chigorodó in the Urabá

region of Colombia. Doe 375 brings this action on behalf of Decedent 375 and on behalf of the Estate of Decedent 375.

400. On 9/30/1996, Decedent 376 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 376, who was the wife of Decedent 376, is the next of kin and legal heir to Decedent 376, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 376 brings this action on behalf of Decedent 376 and on behalf of the Estate of Decedent 376.

401. On 3/14/1996, Decedent 377 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 377, who was the wife of Decedent 377, is the next of kin and legal heir to Decedent 377, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 377 brings this action on behalf of Decedent 377 and on behalf of the Estate of Decedent 377.

402. On 3/21/1995, Decedent 378 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 378, who was the sister of Decedent 378, is the next of kin and legal heir to Decedent 378, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 378 brings this action on behalf of Decedent 378 and on behalf of the Estate of Decedent 378.

403. In March of 1995, Decedent 379 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 379, who was the mother of Decedent 379, is the next of kin and legal heir to Decedent 379, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 379 brings this action on behalf of Decedent 379 and on behalf of the Estate of Decedent 379.

404. In March of 1995, Decedent 380 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 380, who was the mother of Decedent 380, is the next of kin and legal heir to Decedent 380, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 380 brings this action on behalf of Decedent 380 and on behalf of the Estate of Decedent 380.

405. On 8/12/1995, Decedent 381 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 381, who was the wife of Decedent 381, is the next of kin and legal heir to Decedent 381, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 381 brings this action on behalf of Decedent 381 and on behalf of the Estate of Decedent 381.

406. On 11/20/1996, Decedent 382 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 382, who was the mother of Decedent 382, is the next of kin and legal heir to Decedent 382, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 382 brings this action on behalf of Decedent 382 and on behalf of the Estate of Decedent 382.

407. On 7/3/1996, Decedent 383 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 383, who was the mother of Decedent 383, is the next of kin and legal heir to Decedent 383, and resides in the *municipio* of Chigorodó in the Urabá region of Colombia. Doe 383 brings this action on behalf of Decedent 383 and on behalf of the Estate of Decedent 383.

408. On 5/10/1996, Decedent 384 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 384, who was the mother of Decedent 384, is the next of kin and legal heir to Decedent 384, and resides in the *municipio* of Chigorodó in the

Urabá region of Colombia. Doe 384 brings this action on behalf of Decedent 384 and on behalf of the Estate of Decedent 384.

409. On 7/21/1995, Decedent 385 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 385, who was the wife of Decedent 385, is the next of kin and legal heir to Decedent 385, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 385 brings this action on behalf of Decedent 385 and on behalf of the Estate of Decedent 385.

410. On 3/15/1995, Decedent 386 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 386, who was the wife of Decedent 386, is the next of kin and legal heir to Decedent 386, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 386 brings this action on behalf of Decedent 386 and on behalf of the Estate of Decedent 386.

411. On 7/2/1995, Decedent 387 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 387, who was the mother of Decedent 387, is the next of kin and legal heir to Decedent 387, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 387 brings this action on behalf of Decedent 387 and on behalf of the Estate of Decedent 387.

412. On 1/20/1995, Decedent 388 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 388, who was the mother of Decedent 388, is the next of kin and legal heir to Decedent 388, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 388 brings this action on behalf of Decedent 388 and on behalf of the Estate of Decedent 388.

413. On 1/16/1996, Decedent 389 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 389, who was the wife of Decedent 389, is the next of kin and legal heir to Decedent 389, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 389 brings this action on behalf of Decedent 389 and on behalf of the Estate of Decedent 389.

414. On 4/25/1996, Decedent 390 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 390, who was the wife of Decedent 390, is the next of kin and legal heir to Decedent 390, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 390 brings this action on behalf of Decedent 390 and on behalf of the Estate of Decedent 390.

415. On 3/28/1995, Decedent 391 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 391, who was the wife of Decedent 391, is the next of kin and legal heir to Decedent 391, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 391 brings this action on behalf of Decedent 391 and on behalf of the Estate of Decedent 391.

416. On 5/15/1995, Decedent 392 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 392, who was the mother of Decedent 392, is the next of kin and legal heir to Decedent 392, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 392 brings this action on behalf of Decedent 392 and on behalf of the Estate of Decedent 392.

417. On 7/11/1995, Decedent 393 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 393, who was the sister of Decedent 393, is the next of kin and legal heir to Decedent 393, and resides in the *municipio* of Turbo in the Urabá

region of Colombia. Doe 393 brings this action on behalf of Decedent 393 and on behalf of the Estate of Decedent 393.

418. On 1/27/1996, Decedent 394 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 394, who was the brother of Decedent 394, is the next of kin and legal heir to Decedent 394, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 394 brings this action on behalf of Decedent 394 and on behalf of the Estate of Decedent 394.

419. On 2/18/1995, Decedent 395 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 395, who was the wife of Decedent 395, is the next of kin and legal heir to Decedent 395, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 395 brings this action on behalf of Decedent 395 and on behalf of the Estate of Decedent 395.

420. On 1/14/1996, Decedent 396 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 396, who was the wife of Decedent 396, is the next of kin and legal heir to Decedent 396, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 396 brings this action on behalf of Decedent 396 and on behalf of the Estate of Decedent 396.

421. On 7/24/1996, Decedent 397 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 397, who was the wife of Decedent 397, is the next of kin and legal heir to Decedent 397, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 397 brings this action on behalf of Decedent 397 and on behalf of the Estate of Decedent 397.

422. On 4/20/1995, Decedent 398 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 398, who was the wife of Decedent 398, is the next of kin and legal heir to Decedent 398, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 398 brings this action on behalf of Decedent 398 and on behalf of the Estate of Decedent 398.

423. On 7/26/1996, Decedent 399 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 399, who was the daughter of Decedent 399, is the next of kin and legal heir to Decedent 399, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 399 brings this action on behalf of Decedent 399 and on behalf of the Estate of Decedent 399.

424. On 6/27/1995, Decedent 400 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 400, who was the wife of Decedent 400, is the next of kin and legal heir to Decedent 400, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 400 brings this action on behalf of Decedent 400 and on behalf of the Estate of Decedent 400.

425. On 11/15/1995, Decedent 401 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 401, who was the mother of Decedent 401, is the next of kin and legal heir to Decedent 401, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 401 brings this action on behalf of Decedent 401 and on behalf of the Estate of Decedent 401.

426. On 9/18/1995, Decedent 402 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 402, who was the mother of Decedent 402, is the next of kin and legal heir to Decedent 402, and resides in the *municipio* of Turbo in the Urabá

region of Colombia. Doe 402 brings this action on behalf of Decedent 402 and on behalf of the Estate of Decedent 402.

427. On 5/21/1995, Decedent 403 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 403, who was the wife of Decedent 403, is the next of kin and legal heir to Decedent 403, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 403 brings this action on behalf of Decedent 403 and on behalf of the Estate of Decedent 403.

428. On 3/21/1996, Decedent 404 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 404, who was the wife of Decedent 404, is the next of kin and legal heir to Decedent 404, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 404 brings this action on behalf of Decedent 404 and on behalf of the Estate of Decedent 404.

429. On 3/20/1996, Decedent 405 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 405, who was the daughter of Decedent 405, is the next of kin and legal heir to Decedent 405, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 405 brings this action on behalf of Decedent 405 and on behalf of the Estate of Decedent 405.

430. On 10/6/1995, Decedent 406 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 406, who was the wife of Decedent 406, is the next of kin and legal heir to Decedent 406, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 406 brings this action on behalf of Decedent 406 and on behalf of the Estate of Decedent 406.

431. On 10/1/1996, Decedent 407 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 407, who was the mother of Decedent 407, is the next of kin and legal heir to Decedent 407, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 407 brings this action on behalf of Decedent 407 and on behalf of the Estate of Decedent 407.

432. On 1/20/1996, Decedent 408 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 408, who was the father of Decedent 408, is the next of kin and legal heir to Decedent 408, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 408 brings this action on behalf of Decedent 408 and on behalf of the Estate of Decedent 408.

433. On 10/22/1995, Decedent 409 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 409, who was the father of Decedent 409, is the next of kin and legal heir to Decedent 409, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 409 brings this action on behalf of Decedent 409 and on behalf of the Estate of Decedent 409.

434. On 7/9/1995, Decedent 410 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 410, who was the mother of Decedent 410, is the next of kin and legal heir to Decedent 410, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 410 brings this action on behalf of Decedent 410 and on behalf of the Estate of Decedent 410.

435. On 1/1/1996, Decedent 411 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 411, who was the sister of Decedent 411, is the next of kin and legal heir to Decedent 411, and resides in the *municipio* of Turbo in the Urabá

region of Colombia. Doe 411 brings this action on behalf of Decedent 411 and on behalf of the Estate of Decedent 411.

436. On 12/8/1995, Decedent 412 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 412, who was the mother of Decedent 412, is the next of kin and legal heir to Decedent 412, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 412 brings this action on behalf of Decedent 412 and on behalf of the Estate of Decedent 412.

437. On 12/31/1996, Decedent 413 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 413, who was the wife of Decedent 413, is the next of kin and legal heir to Decedent 413, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 413 brings this action on behalf of Decedent 413 and on behalf of the Estate of Decedent 413.

438. On 7/15/1995, Decedent 414 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 414, who was the wife of Decedent 414, is the next of kin and legal heir to Decedent 414, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 414 brings this action on behalf of Decedent 414 and on behalf of the Estate of Decedent 414.

439. On 4/13/1996, Decedent 415 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 415, who was the wife of Decedent 415, is the next of kin and legal heir to Decedent 415, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 415 brings this action on behalf of Decedent 415 and on behalf of the Estate of Decedent 415.

440. In March of 1996, Decedent 416 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 416, who was the mother of Decedent 416, is the next of kin and legal heir to Decedent 416, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 416 brings this action on behalf of Decedent 416 and on behalf of the Estate of Decedent 416.

441. On 9/12/1996, Decedent 417 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 417, who was the mother of Decedent 417, is the next of kin and legal heir to Decedent 417, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 417 brings this action on behalf of Decedent 417 and on behalf of the Estate of Decedent 417.

442. On 1/6/1996, Decedent 418 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 418, who was the mother of Decedent 418, is the next of kin and legal heir to Decedent 418, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 418 brings this action on behalf of Decedent 418 and on behalf of the Estate of Decedent 418.

443. On 11/1/1996, Decedent 419 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 419, who was the mother of Decedent 419, is the next of kin and legal heir to Decedent 419, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 419 brings this action on behalf of Decedent 419 and on behalf of the Estate of Decedent 419.

444. On 9/2/1995, Decedent 420 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 420, who was the wife of Decedent 420, is the next of kin and legal heir to Decedent 420, and resides in the *municipio* of Turbo in the Urabá region

of Colombia. Doe 420 brings this action on behalf of Decedent 420 and on behalf of the Estate of Decedent 420.

445. On 12/14/1995, Decedent 421 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 421, who was the wife of Decedent 421, is the next of kin and legal heir to Decedent 421, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 421 brings this action on behalf of Decedent 421 and on behalf of the Estate of Decedent 421.

446. On 6/17/1995, Decedent 422 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 422, who was the son of Decedent 422, is the next of kin and legal heir to Decedent 422, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 422 brings this action on behalf of Decedent 422 and on behalf of the Estate of Decedent 422.

447. On 9/15/1995, Decedent 423 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 423, who was the mother of Decedent 423, is the next of kin and legal heir to Decedent 423, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 423 brings this action on behalf of Decedent 423 and on behalf of the Estate of Decedent 423.

448. On 8/27/1995, Decedent 424 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 424, who was the sister of Decedent 424, is the next of kin and legal heir to Decedent 424, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 424 brings this action on behalf of Decedent 424 and on behalf of the Estate of Decedent 424.

449. In March of 1996, Decedent 425 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 425, who was the wife of Decedent 425, is the next of kin and legal heir to Decedent 425, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 425 brings this action on behalf of Decedent 425 and on behalf of the Estate of Decedent 425.

450. On 8/1/1996, Decedent 426 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 426, who was the wife of Decedent 426, is the next of kin and legal heir to Decedent 426, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 426 brings this action on behalf of Decedent 426 and on behalf of the Estate of Decedent 426.

451. On 5/14/1995, Decedent 427 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 427, who was the mother of Decedent 427, is the next of kin and legal heir to Decedent 427, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 427 brings this action on behalf of Decedent 427 and on behalf of the Estate of Decedent 427.

452. On 5/29/1996, Decedent 428 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 428, who was the wife of Decedent 428, is the next of kin and legal heir to Decedent 428, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 428 brings this action on behalf of Decedent 428 and on behalf of the Estate of Decedent 428.

453. On 5/15/1996, Decedent 429 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 429, who was the mother of Decedent 429, is the next of kin and legal heir to Decedent 429, and resides in the *municipio* of Turbo in the Urabá

region of Colombia. Doe 429 brings this action on behalf of Decedent 429 and on behalf of the Estate of Decedent 429.

454. On 8/13/1995, Decedent 430 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 430, who was the mother of Decedent 430, is the next of kin and legal heir to Decedent 430, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 430 brings this action on behalf of Decedent 430 and on behalf of the Estate of Decedent 430.

455. On 1/30/1996, Decedent 431 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 431 is the next of kin and legal heir to Decedent 431, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 431 brings this action on behalf of Decedent 431 and on behalf of the Estate of Decedent 431.

456. On 11/14/1995, Decedent 432 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 432 is the next of kin and legal heir to Decedent 432, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 432 brings this action on behalf of Decedent 432 and on behalf of the Estate of Decedent 432.

457. On 12/29/1996, Decedent 433 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 433, who was the daughter of Decedent 433, is the next of kin and legal heir to Decedent 433, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 433 brings this action on behalf of Decedent 433 and on behalf of the Estate of Decedent 433.

458. On 3/13/1996, Decedent 434 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 434, who was the wife of Decedent 434, is the next of kin and legal heir to Decedent 434, and resides in the *municipio* of Turbo in the Urabá region

of Colombia. Doe 434 brings this action on behalf of Decedent 434 and on behalf of the Estate of Decedent 434.

459. On 7/14/1995, Decedent 435 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 435, who was the mother of Decedent 435, is the next of kin and legal heir to Decedent 435, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 435 brings this action on behalf of Decedent 435 and on behalf of the Estate of Decedent 435.

460. On 7/10/1996, Decedent 436 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 436, who was the wife of Decedent 436, is the next of kin and legal heir to Decedent 436, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 436 brings this action on behalf of Decedent 436 and on behalf of the Estate of Decedent 436.

461. On 6/11/1996, Decedent 437 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 437, who was the mother of Decedent 437, is the next of kin and legal heir to Decedent 437, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 437 brings this action on behalf of Decedent 437 and on behalf of the Estate of Decedent 437.

462. On 6/29/1995, Decedent 438 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 438, who was the mother of Decedent 438, is the next of kin and legal heir to Decedent 438, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 438 brings this action on behalf of Decedent 438 and on behalf of the Estate of Decedent 438.

463. On 8/16/1996, Decedent 439 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 439, who was the wife of Decedent 439, is the next of kin and legal heir to Decedent 439, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 439 brings this action on behalf of Decedent 439 and on behalf of the Estate of Decedent 439.

464. On 5/26/1996, Decedent 440 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 440, who was the wife of Decedent 440, is the next of kin and legal heir to Decedent 440, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 440 brings this action on behalf of Decedent 440 and on behalf of the Estate of Decedent 440.

465. On 1/3/1996, Decedent 441 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 441, who was the wife of Decedent 441, is the next of kin and legal heir to Decedent 441, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 441 brings this action on behalf of Decedent 441 and on behalf of the Estate of Decedent 441.

466. On 2/19/1995, Decedent 442 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 442, who was the wife of Decedent 442, is the next of kin and legal heir to Decedent 442, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 442 brings this action on behalf of Decedent 442 and on behalf of the Estate of Decedent 442.

467. On 3/24/1995, Decedent 443 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 443, who was the mother of Decedent 443, is the next of kin and legal heir to Decedent 443, and resides in the *municipio* of Turbo in the Urabá

region of Colombia. Doe 443 brings this action on behalf of Decedent 443 and on behalf of the Estate of Decedent 443.

468. On 5/14/1995, Decedent 444 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 444, who was the mother of Decedent 444, is the next of kin and legal heir to Decedent 444, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 444 brings this action on behalf of Decedent 444 and on behalf of the Estate of Decedent 444.

469. On 9/16/1996, Decedent 445 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 445, who was the mother of Decedent 445, is the next of kin and legal heir to Decedent 445, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 445 brings this action on behalf of Decedent 445 and on behalf of the Estate of Decedent 445.

470. On 11/13/1995, Decedent 446 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 446, who was the mother of Decedent 446, is the next of kin and legal heir to Decedent 446, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 446 brings this action on behalf of Decedent 446 and on behalf of the Estate of Decedent 446.

471. On 3/22/1996, Decedent 447 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 447, who was the mother of Decedent 447, is the next of kin and legal heir to Decedent 447, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 447 brings this action on behalf of Decedent 447 and on behalf of the Estate of Decedent 447.

472. On 7/4/1996, Decedent 448 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 448, who was the father of Decedent 448, is the next of kin and legal heir to Decedent 448, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 448 brings this action on behalf of Decedent 448 and on behalf of the Estate of Decedent 448.

473. On 4/8/1996, Decedent 449 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 449, who was the mother of Decedent 449, is the next of kin and legal heir to Decedent 449, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 449 brings this action on behalf of Decedent 449 and on behalf of the Estate of Decedent 449.

474. On 4/6/1995, Decedent 450 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 450, who was the mother of Decedent 450, is the next of kin and legal heir to Decedent 450, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 450 brings this action on behalf of Decedent 450 and on behalf of the Estate of Decedent 450.

475. On 11/12/1995, Decedent 451 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 451, who was the sister of Decedent 451, is the next of kin and legal heir to Decedent 451, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 451 brings this action on behalf of Decedent 451 and on behalf of the Estate of Decedent 451.

476. On 12/31/1996, Decedent 452 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 452, who was the sister of Decedent 452, is the next of kin and legal heir to Decedent 452, and resides in the *municipio* of Turbo in the Urabá

region of Colombia. Doe 452 brings this action on behalf of Decedent 452 and on behalf of the Estate of Decedent 452.

477. On 2/8/1995, Decedent 453 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 453, who was the son of Decedent 453, is the next of kin and legal heir to Decedent 453, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 453 brings this action on behalf of Decedent 453 and on behalf of the Estate of Decedent 453.

478. On 11/14/1996, Decedent 454 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 454, who was the wife of Decedent 454, is the next of kin and legal heir to Decedent 454, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 454 brings this action on behalf of Decedent 454 and on behalf of the Estate of Decedent 454.

479. On 3/7/1996, Decedent 455 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 455, who was the mother of Decedent 455, is the next of kin and legal heir to Decedent 455, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 455 brings this action on behalf of Decedent 455 and on behalf of the Estate of Decedent 455.

480. On 7/29/1995, Decedent 456 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 456, who was the mother of Decedent 456, is the next of kin and legal heir to Decedent 456, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 456 brings this action on behalf of Decedent 456 and on behalf of the Estate of Decedent 456.

481. On 3/17/1996, Decedent 457 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 457, who was the father of Decedent 457, is the next of kin and legal heir to Decedent 457, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 457 brings this action on behalf of Decedent 457 and on behalf of the Estate of Decedent 457.

482. On 11/10/1996, Decedent 458 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 458, who was the mother of Decedent 458, is the next of kin and legal heir to Decedent 458, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 458 brings this action on behalf of Decedent 458 and on behalf of the Estate of Decedent 458.

483. On 1/20/1996, Decedent 459 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 459, who was the mother of Decedent 459, is the next of kin and legal heir to Decedent 459, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 459 brings this action on behalf of Decedent 459 and on behalf of the Estate of Decedent 459.

484. On 11/17/1995, Decedent 460 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 460, who was the mother of Decedent 460, is the next of kin and legal heir to Decedent 460, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 460 brings this action on behalf of Decedent 460 and on behalf of the Estate of Decedent 460.

485. On 9/28/1996, Decedent 461 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 461, who was the wife of Decedent 461, is the next of kin and legal heir to Decedent 461, and resides in the *municipio* of Turbo in the Urabá region

of Colombia. Doe 461 brings this action on behalf of Decedent 461 and on behalf of the Estate of Decedent 461.

486. On 3/4/1996, Decedent 462 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 462, who was the father of Decedent 462, is the next of kin and legal heir to Decedent 462, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 462 brings this action on behalf of Decedent 462 and on behalf of the Estate of Decedent 462.

487. On 9/18/1996, Decedent 463 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 463, who was the wife of Decedent 463, is the next of kin and legal heir to Decedent 463, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 463 brings this action on behalf of Decedent 463 and on behalf of the Estate of Decedent 463.

488. On 7/24/1995, Decedent 464 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 464, who was the wife of Decedent 464, is the next of kin and legal heir to Decedent 464, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 464 brings this action on behalf of Decedent 464 and on behalf of the Estate of Decedent 464.

489. On 3/4/1996, Decedent 465 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 465, who was the wife of Decedent 465, is the next of kin and legal heir to Decedent 465, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 465 brings this action on behalf of Decedent 465 and on behalf of the Estate of Decedent 465.

490. On 6/4/1996, Decedent 466 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 466, who was the mother of Decedent 466, is the next of kin and legal heir to Decedent 466, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 466 brings this action on behalf of Decedent 466 and on behalf of the Estate of Decedent 466.

491. On 7/21/1995, Decedent 467 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 467, who was the wife of Decedent 467, is the next of kin and legal heir to Decedent 467, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 467 brings this action on behalf of Decedent 467 and on behalf of the Estate of Decedent 467.

492. On 3/6/1996, Decedent 468 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 468, who was the mother of Decedent 468, is the next of kin and legal heir to Decedent 468, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 468 brings this action on behalf of Decedent 468 and on behalf of the Estate of Decedent 468.

493. On 4/14/1996, Decedent 469 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 469, who was the sister of Decedent 469, is the next of kin and legal heir to Decedent 469, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 469 brings this action on behalf of Decedent 469 and on behalf of the Estate of Decedent 469.

494. On 7/13/1996, Decedent 470 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 470, who was the wife of Decedent 470, is the next of kin and legal heir to Decedent 470, and resides in the *municipio* of Turbo in the Urabá region

of Colombia. Doe 470 brings this action on behalf of Decedent 470 and on behalf of the Estate of Decedent 470.

495. On 2/15/1996, Decedent 471 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 471, who was the wife of Decedent 471, is the next of kin and legal heir to Decedent 471, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 471 brings this action on behalf of Decedent 471 and on behalf of the Estate of Decedent 471.

496. On 7/7/1996, Decedent 472 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 472, who was the wife of Decedent 472, is the next of kin and legal heir to Decedent 472, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 472 brings this action on behalf of Decedent 472 and on behalf of the Estate of Decedent 472.

497. On 5/15/1996, Decedent 473 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 473, who was the wife of Decedent 473, is the next of kin and legal heir to Decedent 473, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 473 brings this action on behalf of Decedent 473 and on behalf of the Estate of Decedent 473.

498. On 3/15/1996, Decedent 474 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 474, who was the wife of Decedent 474, is the next of kin and legal heir to Decedent 474, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 474 brings this action on behalf of Decedent 474 and on behalf of the Estate of Decedent 474.

499. On 5/16/1995, Decedent 475 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 475, who was the wife of Decedent 475, is the next of kin and legal heir to Decedent 475, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 475 brings this action on behalf of Decedent 475 and on behalf of the Estate of Decedent 475.

500. On 9/23/1996, Decedent 476 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 476, who was the son of Decedent 476, is the next of kin and legal heir to Decedent 476, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 476 brings this action on behalf of Decedent 476 and on behalf of the Estate of Decedent 476.

501. On 3/13/1995, Decedent 477 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 477, who was the mother of Decedent 477, is the next of kin and legal heir to Decedent 477, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 477 brings this action on behalf of Decedent 477 and on behalf of the Estate of Decedent 477.

502. On 12/16/1996, Decedent 478 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 478, who was the mother of Decedent 478, is the next of kin and legal heir to Decedent 478, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 478 brings this action on behalf of Decedent 478 and on behalf of the Estate of Decedent 478.

503. On 9/8/1996, Decedent 479 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 479, who was the wife of Decedent 479, is the next of kin and legal heir to Decedent 479, and resides in the *municipio* of Turbo in the Urabá region

of Colombia. Doe 479 brings this action on behalf of Decedent 479 and on behalf of the Estate of Decedent 479.

504. On 10/31/1995, Decedent 480 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 480, who was the wife of Decedent 480, is the next of kin and legal heir to Decedent 480, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 480 brings this action on behalf of Decedent 480 and on behalf of the Estate of Decedent 480.

505. On 3/2/1996, Decedent 481 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 481, who was the sister of Decedent 481, is the next of kin and legal heir to Decedent 481, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 481 brings this action on behalf of Decedent 481 and on behalf of the Estate of Decedent 481.

506. On 12/2/1996, Decedent 482 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 482, who was the mother of Decedent 482, is the next of kin and legal heir to Decedent 482, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 482 brings this action on behalf of Decedent 482 and on behalf of the Estate of Decedent 482.

507. On 4/26/1996, Decedent 483 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 483, who was the wife of Decedent 483, is the next of kin and legal heir to Decedent 483, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 483 brings this action on behalf of Decedent 483 and on behalf of the Estate of Decedent 483.

508. On 4/2/1995, Decedent 484 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 484, who was the mother of Decedent 484, is the next of kin and legal heir to Decedent 484, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 484 brings this action on behalf of Decedent 484 and on behalf of the Estate of Decedent 484.

509. On 12/26/1995, Decedent 485 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 485, who was the daughter of Decedent 485, is the next of kin and legal heir to Decedent 485, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 485 brings this action on behalf of Decedent 485 and on behalf of the Estate of Decedent 485.

510. On 11/19/1996, Decedent 486 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 486, who was the wife of Decedent 486, is the next of kin and legal heir to Decedent 486, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 486 brings this action on behalf of Decedent 486 and on behalf of the Estate of Decedent 486.

511. On 1/7/1996, Decedent 487 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 487, who was the mother of Decedent 487, is the next of kin and legal heir to Decedent 487, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 487 brings this action on behalf of Decedent 487 and on behalf of the Estate of Decedent 487.

512. On 1/20/1996, Decedent 488 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 488, who was the wife of Decedent 488, is the next of kin and legal heir to Decedent 488, and resides in the *municipio* of Turbo in the Urabá region

of Colombia. Doe 488 brings this action on behalf of Decedent 488 and on behalf of the Estate of Decedent 488.

513. On 9/17/1996, Decedent 489 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 489, who was the sister of Decedent 489, is the next of kin and legal heir to Decedent 489, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 489 brings this action on behalf of Decedent 489 and on behalf of the Estate of Decedent 489.

514. On 4/7/1996, Decedent 490 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 490, who was the wife of Decedent 490, is the next of kin and legal heir to Decedent 490, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 490 brings this action on behalf of Decedent 490 and on behalf of the Estate of Decedent 490.

515. On 5/7/1996, Decedent 491 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 491, who was the wife of Decedent 491, is the next of kin and legal heir to Decedent 491, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 491 brings this action on behalf of Decedent 491 and on behalf of the Estate of Decedent 491.

516. In June of 1996, Decedent 492 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 492, who was the brother of Decedent 492, is the next of kin and legal heir to Decedent 492, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 492 brings this action on behalf of Decedent 492 and on behalf of the Estate of Decedent 492.

517. On 9/24/1996, Decedent 493 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 493, who was the mother of Decedent 493, is the next of kin and legal heir to Decedent 493, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 493 brings this action on behalf of Decedent 493 and on behalf of the Estate of Decedent 493.

518. On 10/21/1996, Decedent 494 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 494, who was the mother of Decedent 494, is the next of kin and legal heir to Decedent 494, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 494 brings this action on behalf of Decedent 494 and on behalf of the Estate of Decedent 494.

519. On 7/6/1996, Decedent 495 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 495, who was the sister of Decedent 495, is the next of kin and legal heir to Decedent 495, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 495 brings this action on behalf of Decedent 495 and on behalf of the Estate of Decedent 495.

520. On 7/13/1995, Decedent 496 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 496, who was the wife of Decedent 496, is the next of kin and legal heir to Decedent 496, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 496 brings this action on behalf of Decedent 496 and on behalf of the Estate of Decedent 496.

521. On 2/2/1996, Decedent 497 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 497, who was the mother of Decedent 497, is the next of kin and legal heir to Decedent 497, and resides in the *municipio* of Turbo in the Urabá

region of Colombia. Doe 497 brings this action on behalf of Decedent 497 and on behalf of the Estate of Decedent 497.

522. On 2/2/1996, Decedent 498 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 498, who was the mother of Decedent 498, is the next of kin and legal heir to Decedent 498, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 498 brings this action on behalf of Decedent 498 and on behalf of the Estate of Decedent 498.

523. On 5/17/1995, Decedent 499 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 499, who was the father of Decedent 499, is the next of kin and legal heir to Decedent 499, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 499 brings this action on behalf of Decedent 499 and on behalf of the Estate of Decedent 499.

524. On 11/10/1996, Decedent 500 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 500, who was the wife of Decedent 500, is the next of kin and legal heir to Decedent 500, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 500 brings this action on behalf of Decedent 500 and on behalf of the Estate of Decedent 500.

525. On 10/1/1996, Decedent 501 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 501, who was the wife of Decedent 501, is the next of kin and legal heir to Decedent 501, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 501 brings this action on behalf of Decedent 501 and on behalf of the Estate of Decedent 501.

526. On 5/9/1996, Decedent 502 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 502, who was the mother of Decedent 502, is the next of kin and legal heir to Decedent 502, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 502 brings this action on behalf of Decedent 502 and on behalf of the Estate of Decedent 502.

527. On 4/13/1996, Decedent 503 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 503, who was the father of Decedent 503, is the next of kin and legal heir to Decedent 503, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 503 brings this action on behalf of Decedent 503 and on behalf of the Estate of Decedent 503.

528. On 8/7/1995, Decedent 504 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 504, who was the mother of Decedent 504, is the next of kin and legal heir to Decedent 504, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 504 brings this action on behalf of Decedent 504 and on behalf of the Estate of Decedent 504.

529. On 3/22/1995, Decedent 505 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 505, who was the wife of Decedent 505, is the next of kin and legal heir to Decedent 505, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 505 brings this action on behalf of Decedent 505 and on behalf of the Estate of Decedent 505.

530. On 9/12/1995, Decedent 506 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 506, who was the wife of Decedent 506, is the next of kin and legal heir to Decedent 506, and resides in the *municipio* of Turbo in the Urabá region

of Colombia. Doe 506 brings this action on behalf of Decedent 506 and on behalf of the Estate of Decedent 506.

531. On 4/15/1995, Decedent 507 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 507, who was the mother of Decedent 507, is the next of kin and legal heir to Decedent 507, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 507 brings this action on behalf of Decedent 507 and on behalf of the Estate of Decedent 507.

532. On 8/23/1996, Decedent 508 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 508, who was the wife of Decedent 508, is the next of kin and legal heir to Decedent 508, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 508 brings this action on behalf of Decedent 508 and on behalf of the Estate of Decedent 508.

533. On 5/28/1995, Decedent 509 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 509, who was the wife of Decedent 509, is the next of kin and legal heir to Decedent 509, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 509 brings this action on behalf of Decedent 509 and on behalf of the Estate of Decedent 509.

534. On 4/3/1996, Decedent 510 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 510, who was the mother of Decedent 510, is the next of kin and legal heir to Decedent 510, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 510 brings this action on behalf of Decedent 510 and on behalf of the Estate of Decedent 510.

535. On 12/30/1996, Decedent 511 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 511, who was the daughter of Decedent 511, is the next of kin and legal heir to Decedent 511, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 511 brings this action on behalf of Decedent 511 and on behalf of the Estate of Decedent 511.

536. On 9/23/1996, Decedent 512 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 512, who was the wife of Decedent 512, is the next of kin and legal heir to Decedent 512, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 512 brings this action on behalf of Decedent 512 and on behalf of the Estate of Decedent 512.

537. On 10/24/1996, Decedent 513 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 513, who was the wife of Decedent 513, is the next of kin and legal heir to Decedent 513, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 513 brings this action on behalf of Decedent 513 and on behalf of the Estate of Decedent 513.

538. On 9/10/1996, Decedent 514 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 514, who was the mother of Decedent 514, is the next of kin and legal heir to Decedent 514, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 514 brings this action on behalf of Decedent 514 and on behalf of the Estate of Decedent 514.

539. On 8/25/1995, Decedent 515 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 515, who was the wife of Decedent 515, is the next of kin and legal heir to Decedent 515, and resides in the *municipio* of Turbo in the Urabá region

of Colombia. Doe 515 brings this action on behalf of Decedent 515 and on behalf of the Estate of Decedent 515.

540. On 1/11/1996, Decedent 516 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 516, who was the daughter of Decedent 516, is the next of kin and legal heir to Decedent 516, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 516 brings this action on behalf of Decedent 516 and on behalf of the Estate of Decedent 516.

541. On 4/25/1995, Decedent 517 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 517, who was the wife of Decedent 517, is the next of kin and legal heir to Decedent 517, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 517 brings this action on behalf of Decedent 517 and on behalf of the Estate of Decedent 517.

542. On 5/27/1996, Decedent 518 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 518, who was the daughter of Decedent 518, is the next of kin and legal heir to Decedent 518, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 518 brings this action on behalf of Decedent 518 and on behalf of the Estate of Decedent 518.

543. On 2/12/1995, Decedent 519 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 519, who was the mother of Decedent 519, is the next of kin and legal heir to Decedent 519, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 519 brings this action on behalf of Decedent 519 and on behalf of the Estate of Decedent 519.

544. On 3/17/1996, Decedent 520 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 520, who was the mother of Decedent 520, is the next of kin and legal heir to Decedent 520, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 520 brings this action on behalf of Decedent 520 and on behalf of the Estate of Decedent 520.

545. On 4/7/1995, Decedent 521 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 521, who was the wife of Decedent 521, is the next of kin and legal heir to Decedent 521, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 521 brings this action on behalf of Decedent 521 and on behalf of the Estate of Decedent 521.

546. On 6/11/1995, Decedent 522 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 522, who was the wife of Decedent 522, is the next of kin and legal heir to Decedent 522, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 522 brings this action on behalf of Decedent 522 and on behalf of the Estate of Decedent 522.

547. On 8/25/1995, Decedent 523 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 523, who was the wife of Decedent 523, is the next of kin and legal heir to Decedent 523, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 523 brings this action on behalf of Decedent 523 and on behalf of the Estate of Decedent 523.

548. On 11/13/1996, Decedent 524 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 524, who was the wife of Decedent 524, is the next of kin and legal heir to Decedent 524, and resides in the *municipio* of Turbo in the Urabá

region of Colombia. Doe 524 brings this action on behalf of Decedent 524 and on behalf of the Estate of Decedent 524.

549. On 3/20/1996, Decedent 525 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 525, who was the son of Decedent 525, is the next of kin and legal heir to Decedent 525, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 525 brings this action on behalf of Decedent 525 and on behalf of the Estate of Decedent 525.

550. On 3/20/1996, Decedent 526 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 526, who was the mother of Decedent 526, is the next of kin and legal heir to Decedent 526, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 526 brings this action on behalf of Decedent 526 and on behalf of the Estate of Decedent 526.

551. On 12/7/1996, Decedent 527 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 527, who was the wife of Decedent 527, is the next of kin and legal heir to Decedent 527, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 527 brings this action on behalf of Decedent 527 and on behalf of the Estate of Decedent 527.

552. On 6/12/1996, Decedent 528 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 528, who was the sister of Decedent 528, is the next of kin and legal heir to Decedent 528, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 528 brings this action on behalf of Decedent 528 and on behalf of the Estate of Decedent 528.

553. On 8/15/1995, Decedent 529 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 529, who was the mother of Decedent 529, is the next of kin and legal heir to Decedent 529, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 529 brings this action on behalf of Decedent 529 and on behalf of the Estate of Decedent 529.

554. On 3/2/1995, Decedent 530 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 530, who was the mother of Decedent 530, is the next of kin and legal heir to Decedent 530, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 530 brings this action on behalf of Decedent 530 and on behalf of the Estate of Decedent 530.

555. On 7/19/1996, Decedent 531 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 531, who was the wife of Decedent 531, is the next of kin and legal heir to Decedent 531, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 531 brings this action on behalf of Decedent 531 and on behalf of the Estate of Decedent 531.

556. On 5/9/1996, Decedent 532 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 532, who was the mother of Decedent 532, is the next of kin and legal heir to Decedent 532, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 532 brings this action on behalf of Decedent 532 and on behalf of the Estate of Decedent 532.

557. On 11/12/1996, Decedent 533 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 533, who was the mother of Decedent 533, is the next of kin and legal heir to Decedent 533, and resides in the *municipio* of Turbo in the

Urabá region of Colombia. Doe 533 brings this action on behalf of Decedent 533 and on behalf of the Estate of Decedent 533.

558. On 2/1/1996, Decedent 534 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 534, who was the father of Decedent 534, is the next of kin and legal heir to Decedent 534, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 534 brings this action on behalf of Decedent 534 and on behalf of the Estate of Decedent 534.

559. On 7/16/1996, Decedent 535 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 535, who was the wife of Decedent 535, is the next of kin and legal heir to Decedent 535, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 535 brings this action on behalf of Decedent 535 and on behalf of the Estate of Decedent 535.

560. On 8/23/1996, Decedent 536 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 536, who was the mother of Decedent 536, is the next of kin and legal heir to Decedent 536, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 536 brings this action on behalf of Decedent 536 and on behalf of the Estate of Decedent 536.

561. On 5/25/1995, Decedent 537 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 537, who was the wife of Decedent 537, is the next of kin and legal heir to Decedent 537, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 537 brings this action on behalf of Decedent 537 and on behalf of the Estate of Decedent 537.

562. On 12/5/1996, Decedent 538 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 538, who was the wife of Decedent 538, is the next of kin and legal heir to Decedent 538, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 538 brings this action on behalf of Decedent 538 and on behalf of the Estate of Decedent 538.

563. On 4/18/1995, Decedent 539 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 539, who was the daughter of Decedent 539, is the next of kin and legal heir to Decedent 539, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 539 brings this action on behalf of Decedent 539 and on behalf of the Estate of Decedent 539.

564. On 5/28/1996, Decedent 540 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 540, who was the wife of Decedent 540, is the next of kin and legal heir to Decedent 540, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 540 brings this action on behalf of Decedent 540 and on behalf of the Estate of Decedent 540.

565. On 4/2/1995, Decedent 541 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 541, who was the mother of Decedent 541, is the next of kin and legal heir to Decedent 541, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 541 brings this action on behalf of Decedent 541 and on behalf of the Estate of Decedent 541.

566. On 10/18/1995, Decedent 542 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 542, who was the mother of Decedent 542, is the next of kin and legal heir to Decedent 542, and resides in the *municipio* of Turbo in the

Urabá region of Colombia. Doe 542 brings this action on behalf of Decedent 542 and on behalf of the Estate of Decedent 542.

567. On 10/5/1995, Decedent 543 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 543, who was the wife of Decedent 543, is the next of kin and legal heir to Decedent 543, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 543 brings this action on behalf of Decedent 543 and on behalf of the Estate of Decedent 543.

568. On 1/5/1996, Decedent 544 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 544, who was the wife of Decedent 544, is the next of kin and legal heir to Decedent 544, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 544 brings this action on behalf of Decedent 544 and on behalf of the Estate of Decedent 544.

569. On 6/9/1996, Decedent 545 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 545, who was the wife of Decedent 545, is the next of kin and legal heir to Decedent 545, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 545 brings this action on behalf of Decedent 545 and on behalf of the Estate of Decedent 545.

570. On 2/24/1995, Decedent 546 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 546, who was the mother of Decedent 546, is the next of kin and legal heir to Decedent 546, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 546 brings this action on behalf of Decedent 546 and on behalf of the Estate of Decedent 546.

571. On 2/17/1996, Decedent 547 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 547, who was the wife of Decedent 547, is the next of kin and legal heir to Decedent 547, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 547 brings this action on behalf of Decedent 547 and on behalf of the Estate of Decedent 547.

572. On 8/7/1995, Decedent 548 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 548, who was the wife of Decedent 548, is the next of kin and legal heir to Decedent 548, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 548 brings this action on behalf of Decedent 548 and on behalf of the Estate of Decedent 548.

573. On 11/23/1996, Decedent 549 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 549, who was the daughter of Decedent 549, is the next of kin and legal heir to Decedent 549, and resides in the *municipio* of Turbo in the Urabá region of Colombia. Doe 549 brings this action on behalf of Decedent 549 and on behalf of the Estate of Decedent 549.

574. On 9/21/1996, Decedent 550 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 550, who was the mother of Decedent 550, is the next of kin and legal heir to Decedent 550, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 550 brings this action on behalf of Decedent 550 and on behalf of the Estate of Decedent 550.

575. On 6/9/1995, Decedent 551 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 551, who was the wife of Decedent 551, is the next of kin and legal heir to Decedent 551, and resides in the *municipio* of Carepa in the Urabá

region of Colombia. Doe 551 brings this action on behalf of Decedent 551 and on behalf of the Estate of Decedent 551.

576. On 4/10/1996, Decedent 552 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 552, who was the wife of Decedent 552, is the next of kin and legal heir to Decedent 552, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 552 brings this action on behalf of Decedent 552 and on behalf of the Estate of Decedent 552.

577. On 4/10/1996, Decedent 553 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 553, who was the mother of Decedent 553, is the next of kin and legal heir to Decedent 553, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 553 brings this action on behalf of Decedent 553 and on behalf of the Estate of Decedent 553.

578. On 3/2/1996, Decedent 554 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 554, who was the wife of Decedent 554, is the next of kin and legal heir to Decedent 554, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 554 brings this action on behalf of Decedent 554 and on behalf of the Estate of Decedent 554.

579. On 7/27/1996, Decedent 555 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 555, who was the wife of Decedent 555, is the next of kin and legal heir to Decedent 555, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 555 brings this action on behalf of Decedent 555 and on behalf of the Estate of Decedent 555.

580. On 7/3/1996, Decedent 556 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 556, who was the wife of Decedent 556, is the next of kin and legal heir to Decedent 556, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 556 brings this action on behalf of Decedent 556 and on behalf of the Estate of Decedent 556.

581. On 1/27/1995, Decedent 557 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 557, who was the wife of Decedent 557, is the next of kin and legal heir to Decedent 557, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 557 brings this action on behalf of Decedent 557 and on behalf of the Estate of Decedent 557.

582. On 1/29/1996, Decedent 558 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 558, who was the wife of Decedent 558, is the next of kin and legal heir to Decedent 558, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 558 brings this action on behalf of Decedent 558 and on behalf of the Estate of Decedent 558.

583. On 9/13/1996, Decedent 559 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 559, who was the wife of Decedent 559, is the next of kin and legal heir to Decedent 559, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 559 brings this action on behalf of Decedent 559 and on behalf of the Estate of Decedent 559.

584. On 12/2/1996, Decedent 560 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 560, who was the wife of Decedent 560, is the next of kin and legal heir to Decedent 560, and resides in the *municipio* of Carepa in the Urabá

region of Colombia. Doe 560 brings this action on behalf of Decedent 560 and on behalf of the Estate of Decedent 560.

585. On 1/14/1996, Decedent 561 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 561, who was the mother of Decedent 561, is the next of kin and legal heir to Decedent 561, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 561 brings this action on behalf of Decedent 561 and on behalf of the Estate of Decedent 561.

586. On 1/14/1996, Decedent 562 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 562, who was the sister of Decedent 562, is the next of kin and legal heir to Decedent 562, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 562 brings this action on behalf of Decedent 562 and on behalf of the Estate of Decedent 562.

587. On 2/28/1996, Decedent 563 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 563, who was the mother of Decedent 563, is the next of kin and legal heir to Decedent 563, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 563 brings this action on behalf of Decedent 563 and on behalf of the Estate of Decedent 563.

588. On 7/8/1995, Decedent 564 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 564, who was the wife of Decedent 564, is the next of kin and legal heir to Decedent 564, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 564 brings this action on behalf of Decedent 564 and on behalf of the Estate of Decedent 564.

589. On 11/5/1996, Decedent 565 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 565, who was the wife of Decedent 565, is the next of kin and legal heir to Decedent 565, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 565 brings this action on behalf of Decedent 565 and on behalf of the Estate of Decedent 565.

590. On 8/14/1996, Decedent 566 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 566, who was the mother of Decedent 566, is the next of kin and legal heir to Decedent 566, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 566 brings this action on behalf of Decedent 566 and on behalf of the Estate of Decedent 566.

591. On 11/15/1996, Decedent 567 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 567, who was the mother of Decedent 567, is the next of kin and legal heir to Decedent 567, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 567 brings this action on behalf of Decedent 567 and on behalf of the Estate of Decedent 567.

592. On 7/21/1996, Decedent 568 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 568, who was the wife of Decedent 568, is the next of kin and legal heir to Decedent 568, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 568 brings this action on behalf of Decedent 568 and on behalf of the Estate of Decedent 568.

593. On 5/4/1996, Decedent 569 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 569, who was the mother of Decedent 569, is the next of kin and legal heir to Decedent 569, and resides in the *municipio* of Carepa in the Urabá

region of Colombia. Doe 569 brings this action on behalf of Decedent 569 and on behalf of the Estate of Decedent 569.

594. On 10/23/1996, Decedent 570 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 570, who was the mother of Decedent 570, is the next of kin and legal heir to Decedent 570, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 570 brings this action on behalf of Decedent 570 and on behalf of the Estate of Decedent 570.

595. On 11/30/1995, Decedent 571 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 571, who was the wife of Decedent 571, is the next of kin and legal heir to Decedent 571, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 571 brings this action on behalf of Decedent 571 and on behalf of the Estate of Decedent 571.

596. On 5/15/1995, Decedent 572 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 572, who was the sister of Decedent 572, is the next of kin and legal heir to Decedent 572, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 572 brings this action on behalf of Decedent 572 and on behalf of the Estate of Decedent 572.

597. On 11/25/1995, Decedent 573 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 573, who was the wife of Decedent 573, is the next of kin and legal heir to Decedent 573, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 573 brings this action on behalf of Decedent 573 and on behalf of the Estate of Decedent 573.

598. On 4/5/1995, Decedent 574 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 574, who was the mother of Decedent 574, is the next of kin and legal heir to Decedent 574, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 574 brings this action on behalf of Decedent 574 and on behalf of the Estate of Decedent 574.

599. On 4/4/1996, Decedent 575 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 575, who was the wife of Decedent 575, is the next of kin and legal heir to Decedent 575, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 575 brings this action on behalf of Decedent 575 and on behalf of the Estate of Decedent 575.

600. On 9/14/1995, Decedent 576 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 576, who was the wife of Decedent 576, is the next of kin and legal heir to Decedent 576, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 576 brings this action on behalf of Decedent 576 and on behalf of the Estate of Decedent 576.

601. On 12/25/1996, Decedent 577 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 577, who was the wife of Decedent 577, is the next of kin and legal heir to Decedent 577, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 577 brings this action on behalf of Decedent 577 and on behalf of the Estate of Decedent 577.

602. On 5/19/1995, Decedent 578 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 578, who was the wife of Decedent 578, is the next of kin and legal heir to Decedent 578, and resides in the *municipio* of Carepa in the Urabá

region of Colombia. Doe 578 brings this action on behalf of Decedent 578 and on behalf of the Estate of Decedent 578.

603. On 10/20/1995, Decedent 579 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 579, who was the wife of Decedent 579, is the next of kin and legal heir to Decedent 579, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 579 brings this action on behalf of Decedent 579 and on behalf of the Estate of Decedent 579.

604. On 6/22/1996, Decedent 580 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 580, who was the wife of Decedent 580, is the next of kin and legal heir to Decedent 580, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 580 brings this action on behalf of Decedent 580 and on behalf of the Estate of Decedent 580.

605. On 7/6/1995, Decedent 581 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 581, who was the mother of Decedent 581, is the next of kin and legal heir to Decedent 581, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 581 brings this action on behalf of Decedent 581 and on behalf of the Estate of Decedent 581.

606. On 5/23/1995, Decedent 582 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 582, who was the wife of Decedent 582, is the next of kin and legal heir to Decedent 582, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 582 brings this action on behalf of Decedent 582 and on behalf of the Estate of Decedent 582.

607. On 4/16/1995, Decedent 583 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 583, who was the mother of Decedent 583, is the next of kin and legal heir to Decedent 583, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 583 brings this action on behalf of Decedent 583 and on behalf of the Estate of Decedent 583.

608. On 2/14/1996, Decedent 584 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 584, who was the mother of Decedent 584, is the next of kin and legal heir to Decedent 584, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 584 brings this action on behalf of Decedent 584 and on behalf of the Estate of Decedent 584.

609. On 4/18/1995, Decedent 585 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 585, who was the wife of Decedent 585, is the next of kin and legal heir to Decedent 585, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 585 brings this action on behalf of Decedent 585 and on behalf of the Estate of Decedent 585.

610. On 11/5/1996, Decedent 586 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 586, who was the wife of Decedent 586, is the next of kin and legal heir to Decedent 586, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 586 brings this action on behalf of Decedent 586 and on behalf of the Estate of Decedent 586.

611. In 1995, Decedent 587 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 587, who was the mother of Decedent 587, is the next of kin and legal heir to Decedent 587, and resides in the *municipio* of Carepa in the Urabá

region of Colombia. Doe 587 brings this action on behalf of Decedent 587 and on behalf of the Estate of Decedent 587.

612. In 1996, Decedent 588 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 588, who was the mother of Decedent 588, is the next of kin and legal heir to Decedent 588, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 588 brings this action on behalf of Decedent 588 and on behalf of the Estate of Decedent 588.

613. On 2/24/1996, Decedent 589 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 589, who was the wife of Decedent 589, is the next of kin and legal heir to Decedent 589, and resides in the *municipio* of Carepa in the Urabá region of Colombia. Doe 589 brings this action on behalf of Decedent 589 and on behalf of the Estate of Decedent 589.

614. On 7/11/1995, Decedent 590 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 590, who was the husband of Decedent 590, is the next of kin and legal heir to Decedent 590, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 590 brings this action on behalf of Decedent 590 and on behalf of the Estate of Decedent 590.

615. On 10/8/1995, Decedent 591 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 591, who was the mother of Decedent 591, is the next of kin and legal heir to Decedent 591, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 591 brings this action on behalf of Decedent 591 and on behalf of the Estate of Decedent 591.

616. On 4/29/1996, Decedent 592 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 592, who was the daughter of Decedent 592, is the next of kin and legal heir to Decedent 592, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 592 brings this action on behalf of Decedent 592 and on behalf of the Estate of Decedent 592.

617. On 3/11/1995, Decedent 593 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 593, who was the mother of Decedent 593, is the next of kin and legal heir to Decedent 593, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 593 brings this action on behalf of Decedent 593 and on behalf of the Estate of Decedent 593.

618. On 6/11/1996, Decedent 594 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 594, who was the mother of Decedent 594, is the next of kin and legal heir to Decedent 594, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 594 brings this action on behalf of Decedent 594 and on behalf of the Estate of Decedent 594.

619. On 12/31/1995, Decedent 595 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 595, who was the mother of Decedent 595, is the next of kin and legal heir to Decedent 595, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 595 brings this action on behalf of Decedent 595 and on behalf of the Estate of Decedent 595.

620. On 12/31/1995, Decedent 596 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 596, who was the mother of Decedent 596, is the next of kin and legal heir to Decedent 596, and resides in the *municipio* of Necoclí in the

Urabá region of Colombia. Doe 596 brings this action on behalf of Decedent 596 and on behalf of the Estate of Decedent 596.

621. On 8/8/1995, Decedent 597 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 597, who was the wife of Decedent 597, is the next of kin and legal heir to Decedent 597, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 597 brings this action on behalf of Decedent 597 and on behalf of the Estate of Decedent 597.

622. On 8/21/1996, Decedent 598 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 598, who was the daughter of Decedent 598, is the next of kin and legal heir to Decedent 598, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 598 brings this action on behalf of Decedent 598 and on behalf of the Estate of Decedent 598.

623. On 8/25/1996, Decedent 599 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 599, who was the mother of Decedent 599, is the next of kin and legal heir to Decedent 599, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 599 brings this action on behalf of Decedent 599 and on behalf of the Estate of Decedent 599.

624. On 12/3/1995, Decedent 600 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 600, who was the wife of Decedent 600, is the next of kin and legal heir to Decedent 600, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 600 brings this action on behalf of Decedent 600 and on behalf of the Estate of Decedent 600.

625. On 11/13/1996, Decedent 601 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 601, who was the wife of Decedent 601, is the next of kin and legal heir to Decedent 601, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 601 brings this action on behalf of Decedent 601 and on behalf of the Estate of Decedent 601.

626. On 4/8/1996, Decedent 602 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 602, who was the wife of Decedent 602, is the next of kin and legal heir to Decedent 602, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 602 brings this action on behalf of Decedent 602 and on behalf of the Estate of Decedent 602.

627. On 10/5/1995, Decedent 603 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 603, who was the wife of Decedent 603, is the next of kin and legal heir to Decedent 603, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 603 brings this action on behalf of Decedent 603 and on behalf of the Estate of Decedent 603.

628. On 7/6/1995, Decedent 604 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 604, who was the son of Decedent 604, is the next of kin and legal heir to Decedent 604, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 604 brings this action on behalf of Decedent 604 and on behalf of the Estate of Decedent 604.

629. On 8/5/1996, Decedent 605 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 605, who was the daughter of Decedent 605, is the next of kin and legal heir to Decedent 605, and resides in the *municipio* of Necoclí in the Urabá

region of Colombia. Doe 605 brings this action on behalf of Decedent 605 and on behalf of the Estate of Decedent 605.

630. On 8/5/1996, Decedent 606 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 606, who was the sister of Decedent 606, is the next of kin and legal heir to Decedent 606, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 606 brings this action on behalf of Decedent 606 and on behalf of the Estate of Decedent 606.

631. On 9/9/1996, Decedent 607 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 607, who was the wife of Decedent 607, is the next of kin and legal heir to Decedent 607, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 607 brings this action on behalf of Decedent 607 and on behalf of the Estate of Decedent 607.

632. On 11/17/1995, Decedent 608 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 608, who was the daughter of Decedent 608, is the next of kin and legal heir to Decedent 608, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 608 brings this action on behalf of Decedent 608 and on behalf of the Estate of Decedent 608.

633. On 5/26/1996, Decedent 609 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 609, who was the wife of Decedent 609, is the next of kin and legal heir to Decedent 609, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 609 brings this action on behalf of Decedent 609 and on behalf of the Estate of Decedent 609.

634. On 6/11/1995, Decedent 610 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 610, who was the son of Decedent 610, is the next of kin and legal heir to Decedent 610, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 610 brings this action on behalf of Decedent 610 and on behalf of the Estate of Decedent 610.

635. On 1/14/1995, Decedent 611 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 611, who was the mother of Decedent 611, is the next of kin and legal heir to Decedent 611, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 611 brings this action on behalf of Decedent 611 and on behalf of the Estate of Decedent 611.

636. On 9/9/1995, Decedent 612 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 612, who was the father of Decedent 612, is the next of kin and legal heir to Decedent 612, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 612 brings this action on behalf of Decedent 612 and on behalf of the Estate of Decedent 612.

637. On 11/26/1995, Decedent 613 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 613, who was the son of Decedent 613, is the next of kin and legal heir to Decedent 613, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 613 brings this action on behalf of Decedent 613 and on behalf of the Estate of Decedent 613.

638. On 12/4/1995, Decedent 614 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 614, who was the wife of Decedent 614, is the next of kin and legal heir to Decedent 614, and resides in the *municipio* of Necoclí in the Urabá

region of Colombia. Doe 614 brings this action on behalf of Decedent 614 and on behalf of the Estate of Decedent 614.

639. On 12/4/1995, Decedent 615 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 615, who was the mother of Decedent 615, is the next of kin and legal heir to Decedent 615, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 615 brings this action on behalf of Decedent 615 and on behalf of the Estate of Decedent 615.

640. On 12/4/1995, Decedent 616 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 616, who was the mother of Decedent 616, is the next of kin and legal heir to Decedent 616, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 616 brings this action on behalf of Decedent 616 and on behalf of the Estate of Decedent 616.

641. On 9/24/1996, Decedent 617 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 617, who was the wife of Decedent 617, is the next of kin and legal heir to Decedent 617, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 617 brings this action on behalf of Decedent 617 and on behalf of the Estate of Decedent 617.

642. On 4/12/1996, Decedent 618 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 618, who was the father of Decedent 618, is the next of kin and legal heir to Decedent 618, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 618 brings this action on behalf of Decedent 618 and on behalf of the Estate of Decedent 618.

643. On 8/6/1995, Decedent 619 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 619, who was the father of Decedent 619, is the next of kin and legal heir to Decedent 619, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 619 brings this action on behalf of Decedent 619 and on behalf of the Estate of Decedent 619.

644. On 12/6/1996, Decedent 620 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 620, who was the mother of Decedent 620, is the next of kin and legal heir to Decedent 620, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 620 brings this action on behalf of Decedent 620 and on behalf of the Estate of Decedent 620.

645. On 10/25/1995, Decedent 621 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 621, who was the wife of Decedent 621, is the next of kin and legal heir to Decedent 621, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 621 brings this action on behalf of Decedent 621 and on behalf of the Estate of Decedent 621.

646. On 6/21/1995, Decedent 622 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 622, who was the father of Decedent 622, is the next of kin and legal heir to Decedent 622, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 622 brings this action on behalf of Decedent 622 and on behalf of the Estate of Decedent 622.

647. On 6/9/1995, Decedent 623 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 623, who was the wife of Decedent 623, is the next of kin and legal heir to Decedent 623, and resides in the *municipio* of Necoclí in the Urabá

region of Colombia. Doe 623 brings this action on behalf of Decedent 623 and on behalf of the Estate of Decedent 623.

648. On 6/11/1996, Decedent 624 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 624, who was the mother of Decedent 624, is the next of kin and legal heir to Decedent 624, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 624 brings this action on behalf of Decedent 624 and on behalf of the Estate of Decedent 624.

649. On 1/1/1995, Decedent 625 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 625, who was the mother of Decedent 625, is the next of kin and legal heir to Decedent 625, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 625 brings this action on behalf of Decedent 625 and on behalf of the Estate of Decedent 625.

650. On 11/24/1996, Decedent 626 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 626, who was the wife of Decedent 626, is the next of kin and legal heir to Decedent 626, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 626 brings this action on behalf of Decedent 626 and on behalf of the Estate of Decedent 626.

651. On 9/11/1996, Decedent 627 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 627, who was the wife of Decedent 627, is the next of kin and legal heir to Decedent 627, and resides in the *municipio* of Necoclí in the Urabá region of Colombia. Doe 627 brings this action on behalf of Decedent 627 and on behalf of the Estate of Decedent 627.

652. On 8/8/1996, Decedent 628 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 628, who was the father of Decedent 628, is the next of kin and legal heir to Decedent 628, and resides in the *municipio* of Mutata in the Urabá region of Colombia. Doe 628 brings this action on behalf of Decedent 628 and on behalf of the Estate of Decedent 628.

653. On 12/31/1996, Decedent 629 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 629, who was the wife of Decedent 629, is the next of kin and legal heir to Decedent 629, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 629 brings this action on behalf of Decedent 629 and on behalf of the Estate of Decedent 629.

654. On 10/16/1996, Decedent 630 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 630, who was the wife of Decedent 630, is the next of kin and legal heir to Decedent 630, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 630 brings this action on behalf of Decedent 630 and on behalf of the Estate of Decedent 630.

655. On 10/28/1996, Decedent 631 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 631, who was the wife of Decedent 631, is the next of kin and legal heir to Decedent 631, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 631 brings this action on behalf of Decedent 631 and on behalf of the Estate of Decedent 631.

656. On 5/6/1996, Decedent 632 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 632, who was the father of Decedent 632, is the next of kin and legal heir to Decedent 632, and resides in the *municipio* of Dabeiba in the Urabá

region of Colombia. Doe 632 brings this action on behalf of Decedent 632 and on behalf of the Estate of Decedent 632.

657. On 6/10/1996, Decedent 633 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 633, who was the father of Decedent 633, is the next of kin and legal heir to Decedent 633, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 633 brings this action on behalf of Decedent 633 and on behalf of the Estate of Decedent 633.

658. On 12/22/1996, Decedent 634 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 634, who was the wife of Decedent 634, is the next of kin and legal heir to Decedent 634, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 634 brings this action on behalf of Decedent 634 and on behalf of the Estate of Decedent 634.

659. On 12/31/1996, Decedent 635 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 635, who was the wife of Decedent 635, is the next of kin and legal heir to Decedent 635, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 635 brings this action on behalf of Decedent 635 and on behalf of the Estate of Decedent 635.

660. On 3/1/1996, Decedent 636 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 636, who was the mother of Decedent 636, is the next of kin and legal heir to Decedent 636, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 636 brings this action on behalf of Decedent 636 and on behalf of the Estate of Decedent 636.

661. On 8/17/1996, Decedent 637 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 637, who was the tio of Decedent 637, is the next of kin and legal heir to Decedent 637, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 637 brings this action on behalf of Decedent 637 and on behalf of the Estate of Decedent 637.

662. On 5/20/1996, Decedent 638 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 638, who was the wife of Decedent 638, is the next of kin and legal heir to Decedent 638, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 638 brings this action on behalf of Decedent 638 and on behalf of the Estate of Decedent 638.

663. On 9/26/1996, Decedent 639 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 639, who was the wife of Decedent 639, is the next of kin and legal heir to Decedent 639, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 639 brings this action on behalf of Decedent 639 and on behalf of the Estate of Decedent 639.

664. On 1/5/1995, Decedent 640 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 640, who was the father of Decedent 640, is the next of kin and legal heir to Decedent 640, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 640 brings this action on behalf of Decedent 640 and on behalf of the Estate of Decedent 640.

665. On 11/29/1996, Decedent 641 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 641, who was the father of Decedent 641, is the next of kin and legal heir to Decedent 641, and resides in the *municipio* of Dabeiba in the

Urabá region of Colombia. Doe 641 brings this action on behalf of Decedent 641 and on behalf of the Estate of Decedent 641.

666. On 10/27/1995, Decedent 642 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 642, who was the mother of Decedent 642, is the next of kin and legal heir to Decedent 642, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 642 brings this action on behalf of Decedent 642 and on behalf of the Estate of Decedent 642.

667. On 8/13/1996, Decedent 643 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 643, who was the wife of Decedent 643, is the next of kin and legal heir to Decedent 643, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 643 brings this action on behalf of Decedent 643 and on behalf of the Estate of Decedent 643.

668. On 7/26/1995, Decedent 644 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 644, who was the brother of Decedent 644, is the next of kin and legal heir to Decedent 644, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 644 brings this action on behalf of Decedent 644 and on behalf of the Estate of Decedent 644.

669. On 5/17/1996, Decedent 645 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 645, who was the sister of Decedent 645, is the next of kin and legal heir to Decedent 645, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 645 brings this action on behalf of Decedent 645 and on behalf of the Estate of Decedent 645.

670. On 4/28/1996, Decedent 646 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 646, who was the wife of Decedent 646, is the next of kin and legal heir to Decedent 646, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 646 brings this action on behalf of Decedent 646 and on behalf of the Estate of Decedent 646.

671. On 6/24/1995, Decedent 647 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 647, who was the brother of Decedent 647, is the next of kin and legal heir to Decedent 647, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 647 brings this action on behalf of Decedent 647 and on behalf of the Estate of Decedent 647.

672. On 11/28/1996, Decedent 648 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 648, who was the wife of Decedent 648, is the next of kin and legal heir to Decedent 648, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 648 brings this action on behalf of Decedent 648 and on behalf of the Estate of Decedent 648.

673. On 4/20/1996, Decedent 649 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 649, who was the mother of Decedent 649, is the next of kin and legal heir to Decedent 649, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 649 brings this action on behalf of Decedent 649 and on behalf of the Estate of Decedent 649.

674. On 5/3/1996, Decedent 650 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 650, who was the wife of Decedent 650, is the next of kin and legal heir to Decedent 650, and resides in the *municipio* of Dabeiba in the Urabá

region of Colombia. Doe 650 brings this action on behalf of Decedent 650 and on behalf of the Estate of Decedent 650.

675. On 8/8/1996, Decedent 651 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 651, who was the wife of Decedent 651, is the next of kin and legal heir to Decedent 651, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 651 brings this action on behalf of Decedent 651 and on behalf of the Estate of Decedent 651.

676. On 9/29/1996, Decedent 652 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 652, who was the wife of Decedent 652, is the next of kin and legal heir to Decedent 652, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 652 brings this action on behalf of Decedent 652 and on behalf of the Estate of Decedent 652.

677. On 9/14/1996, Decedent 653 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 653, who was the mother of Decedent 653, is the next of kin and legal heir to Decedent 653, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 653 brings this action on behalf of Decedent 653 and on behalf of the Estate of Decedent 653.

678. On 7/6/1996, Decedent 654 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 654, who was the mother of Decedent 654, is the next of kin and legal heir to Decedent 654, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 654 brings this action on behalf of Decedent 654 and on behalf of the Estate of Decedent 654.

679. On 12/17/1996, Decedent 655 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 655, who was the father of Decedent 655, is the next of kin and legal heir to Decedent 655, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 655 brings this action on behalf of Decedent 655 and on behalf of the Estate of Decedent 655.

680. On 12/21/1996, Decedent 656 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 656, who was the father of Decedent 656, is the next of kin and legal heir to Decedent 656, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 656 brings this action on behalf of Decedent 656 and on behalf of the Estate of Decedent 656.

681. On 8/14/1996, Decedent 657 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 657, who was the daughter of Decedent 657, is the next of kin and legal heir to Decedent 657, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 657 brings this action on behalf of Decedent 657 and on behalf of the Estate of Decedent 657.

682. On 11/26/1996, Decedent 658 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 658, who was the wife of Decedent 658, is the next of kin and legal heir to Decedent 658, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 658 brings this action on behalf of Decedent 658 and on behalf of the Estate of Decedent 658.

683. On 10/24/1996, Decedent 659 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 659, who was the daughter of Decedent 659, is the next of kin and legal heir to Decedent 659, and resides in the *municipio* of Dabeiba in the

Urabá region of Colombia. Doe 659 brings this action on behalf of Decedent 659 and on behalf of the Estate of Decedent 659.

684. On 8/14/1996, Decedent 660 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 660, who was the mother of Decedent 660, is the next of kin and legal heir to Decedent 660, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 660 brings this action on behalf of Decedent 660 and on behalf of the Estate of Decedent 660.

685. On 7/10/1996, Decedent 661 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 661, who was the mother of Decedent 661, is the next of kin and legal heir to Decedent 661, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 661 brings this action on behalf of Decedent 661 and on behalf of the Estate of Decedent 661.

686. On 11/30/1996, Decedent 662 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 662, who was the wife of Decedent 662, is the next of kin and legal heir to Decedent 662, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 662 brings this action on behalf of Decedent 662 and on behalf of the Estate of Decedent 662.

687. On 5/14/1995, Decedent 663 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 663, who was the mother of Decedent 663, is the next of kin and legal heir to Decedent 663, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 663 brings this action on behalf of Decedent 663 and on behalf of the Estate of Decedent 663.

688. On 4/6/1996, Decedent 664 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 664, who was the mother of Decedent 664, is the next of kin and legal heir to Decedent 664, and resides in the *municipio* of Riosucio in the Urabá region of Colombia. Doe 664 brings this action on behalf of Decedent 664 and on behalf of the Estate of Decedent 664.

689. On 3/4/1996, Decedent 665 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 665, who was the mother of Decedent 665, is the next of kin and legal heir to Decedent 665, and resides in the *municipio* of Riosucio in the Urabá region of Colombia. Doe 665 brings this action on behalf of Decedent 665 and on behalf of the Estate of Decedent 665.

690. On 5/10/1996, Decedent 666 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 666, who was the mother of Decedent 666, is the next of kin and legal heir to Decedent 666, and resides in the *municipio* of Riosucio in the Urabá region of Colombia. Doe 666 brings this action on behalf of Decedent 666 and on behalf of the Estate of Decedent 666.

691. On 9/19/1995, Decedent 667 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 667, who was the wife of Decedent 667, is the next of kin and legal heir to Decedent 667, and resides in the city of Medellin in Colombia. Doe 667 brings this action on behalf of Decedent 667 and on behalf of the Estate of Decedent 667.

692. On 1/31/1996, Decedent 668 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 668, who was the son of Decedent 668, is the next of kin and legal heir to Decedent 668, and resides in the city of Medellin in Colombia. Doe 668 brings this action on behalf of Decedent 668 and on behalf of the Estate of Decedent 668.

Group 3: Injuries and Miscellaneous Cases

693. On 3/29/2004, Doe 669 was injured by the AUC, which received support from Chiquita and/or Banadex. Doe 669 resides in the *municipio* of Chigorodo in the Urabá region of Colombia.

694. On 12/27/2002, Doe 670 was injured by the AUC, which received support from Chiquita and/or Banadex. Doe 670 resides in the *municipio* of Turbo in the Urabá region of Colombia.

695. On 2/14/1997, Doe 671 was injured by the AUC, which received support from Chiquita and/or Banadex. Doe 670 resides in the *municipio* of Carepa in the Urabá region of Colombia.

696. On 2/13/1997, Doe 672 was injured by the AUC, which received support from Chiquita and/or Banadex. Doe 670 resides in the *municipio* of Carepa in the Urabá region of Colombia.

697. On 1/18/1998, Decedent 673 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 673, who was the mother of Decedent 673, is the next of kin and legal heir to Decedent 673, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 673 brings this action on behalf of Decedent 673 and on behalf of the Estate of Decedent 673.

698. On 10/12/1998, Decedent 674 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 674, who was the wife of Decedent 674, is the next of kin and legal heir to Decedent 674, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 674 brings this action on behalf of Decedent 674 and on behalf of the Estate of Decedent 674.

699. On 6/17/1999, Decedent 675 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 675, who was the wife of Decedent 675, is the next of kin and legal heir to Decedent 675, and resides in the *municipio* of Apartado in the Urabá region of Colombia. Doe 675 brings this action on behalf of Decedent 675 and on behalf of the Estate of Decedent 675.

700. On 11/10/2000, Decedent 676 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 676, who was the mother of Decedent 676, is the next of kin and legal heir to Decedent 676, and resides in the *municipio* of Chigorodo in the Urabá region of Colombia. Doe 676 brings this action on behalf of Decedent 676 and on behalf of the Estate of Decedent 676.

701. On 10/26/2000, Decedent 677 was killed by the AUC, which received support from Chiquita and/or Banadex. Doe 677, who was the mother of Decedent 1, is the next of kin and legal heir to Decedent 677, and resides in the *municipio* of Dabeiba in the Urabá region of Colombia. Doe 677 brings this action on behalf of Decedent 677 and on behalf of the Estate of Decedent 677.

Defendants

702. Defendant Chiquita Brands International, Inc., (hereinafter "Chiquita") is a United States-based corporation organized under the laws of the State of New Jersey. Its corporate headquarters are located in Cincinnati, Ohio. Chiquita is a leading international producer, distributor, and marketer of bananas and other produce; it is one of the largest banana producers in the world and a major supplier of bananas in Europe and North America. The company was founded in 1899 as the United Fruit Company, became the

United Brands Company in 1970, and changed its name to Chiquita Brands International in 1990.

703. On information and belief, at all times relevant herein, Chiquita wholly owned, dominated and controlled C.I. Bananos de Exportacion, S.A. ("Banadex"), headquartered in Medellín, Colombia. Banadex produced bananas in the Urabá region of Colombia and, by 2003, was Chiquita's most profitable banana-producing operation. At all times material herein, Banadex was an agent, alter ego, co-conspirator, and joint tortfeasor with Chiquita, with whom it cooperated in a joint criminal enterprise.

704. Plaintiffs are ignorant of the true names and capacities of the Defendants who are sued herein as Doe Defendant Corporations 1-10 and Doe Defendants 11-25, and Plaintiffs sue these Defendants by such fictitious names and capacities. Plaintiffs will amend this Complaint to allege the Does' true names and capacities when ascertained. Plaintiffs are informed and believe, and on that basis allege, that each fictitiously named Defendant is responsible in some manner for the occurrences herein alleged and that the injuries to Plaintiffs herein alleged were proximately caused by the conduct of such Defendants, in that each caused, conspired to cause, worked in concert to cause, participated in a joint criminal enterprise that caused, or aided and abetted the injuries complained of, and/or was the principal, employer, or other legally responsible person for the persons who caused, conspired to cause, worked in concert to cause, participated in a joint criminal enterprise that caused, and/or aided and abetted such injuries. Whenever and wherever reference is made in this Complaint to any conduct committed by Chiquita, and/or Banadex, such allegations and references shall also be deemed to mean the conduct of Chiquita and Banadex, acting individually, jointly and severally, through

personnel working in the United States and Colombia for the benefit of Chiquita and Banadex.

705. At all times herein material, with respect to the events at issue, Chiquita, Banadex, Doe Corporations 1-10 and Does 11-25 conspired with each other, and/or participated in a joint criminal enterprise with each other, and/or acted in concert, and/or aided or abetted each others' actions, and/or were in an agency or alter ego or joint venture relationship, and were acting within the course and scope of such conspiracy, joint criminal enterprise, concerted activity, aiding and abetting, and/or agency or alter ego or joint venture relationship. As described herein, "agency" includes agency by ratification. Whenever reference is made in this complaint to any conduct by a defendant, such allegations and references shall be construed to mean the conduct of each of the defendants, acting individually, jointly, and severally.

706. At all times herein material, with respect to the events at issue, Chiquita conspired with, worked in concert with, participated in a joint criminal enterprise with, acted as the principal of, employed, and/or aided and abetted the violent terrorist organizations responsible for Plaintiffs' injuries, including but not limited to the AUC, and the terrorist organizations were acting within the course and scope of such agency, employment, and/or concerted activity. The wrongful conduct alleged herein was perpetrated by Chiquita management and personnel both in Colombia and the United States.

707. On information and belief, Chiquita management and other personnel in the United States and in Colombia were informed of the ongoing events complained of herein and personally participated in the decision making, planning, preparation, ratification, and/or execution of the acts complained of.

STATEMENT OF FACTS

A. The Colombian Conflict and Paramilitary Terrorist Organizations

708. The acronym "AUC" is used herein to refer to the Autodefensas Unidas de Colombia, or United Self Defense Groups of Colombia, as well as its predecessor and successor organizations, including the Autodefensas Campesinas de Cordoba y Uraba (Peasant Self Defense Groups of Cordoba and Uraba, or ACCU), the *Paisas* (Patriots), the *Aguilas Negras* (Black Eagles), and the forces controlled by former AUC commanders Freddy Rendon Herrera and Daniel Rendon Herrera in the Urabá region. The term "paramilitaries" is used more loosely to refer to the same groups.

709. In the early 1980s, Colombia saw a vast expansion in trade in illegal drugs, particularly cocaine. An emerging class of drug barons, with the cooperation and facilitation of the Colombian government, began to create private armies to combat left-wing guerrilla forces, including the Revolutionary Armed Forces of Colombia (Fuerzas Armadas Revolucionarias de Colombia, or FARC) the National Liberation Army (Ejercito Nacional de Liberacion, or ELN), and the (Ejercito Popular de Liberación, or EPL) who were engaged in terrorist activities such as extortion, kidnappings, and assassinations. Despite their ties to private individuals, the paramilitaries were a key part of the Colombian state strategy to combat the guerrilla insurgency from their inception.

710. In 1981, the Medellin cartel created a death squad, Muerte a Secuestradores ("Death to Kidnappers"), which targeted guerrillas for elimination and adopted brutal, terrorist tactics. As the 1980s progressed, paramilitaries maintained links with drug barons, large landowners, industrialists, and bankers who funded them, although in some cases they achieved some autonomy in their violent activities. This drug war and the

escalation of violence provoked President Barco to issue the Decree 1194 of 1989 (adopted as permanent legislation by Decree 2266 of 1991), which criminalized membership in a paramilitary group or the provision of any support to such groups, including funding, training, or providing them with arms.

711. By the mid 1990's, paramilitary groups had achieved a substantial degree of independence from their creators due to their increased participation in, and benefit from, drug trafficking, and had become a major force in the fight against the guerrillas. The largest and most well-organized paramilitary group in Colombia was the Rural Self-Defense Group of Córdoba and Urabá (Autodefensas Campesinas de Córdoba and Urabá, or ACCU). The organization featured a central command that coordinated the activities of local fronts. Both mobile and stationary units existed, and fighters received a base salary plus food, a uniform, weapons, and munitions. The commander-in-chief of the ACCU was Carlos Castaño, a long-time paramilitary fighter with family ties to the drug trade. In 1994, Castaño and the ACCU sponsored a summit of paramilitary groups in Rialto, Colombia, bringing together regional paramilitaries from across the country. This summit led to the formation of the AUC, a national federation uniting Colombia's regional paramilitaries under Castaño's leadership. Castaño remained the leader of the AUC until his death in April 16, 2004.

712. The efforts of the AUC were directed toward elimination of anyone considered close to the guerrillas or who opposed or complicated the paramilitaries' control of territory or population in the area in which they exerted their power. The AUC's primary method was terrorism against individuals or communities. To this end, the AUC, like the ACCU before it, routinely engaged in death threats, extrajudicial killings, massacres,

torture, rape, kidnapping, forced disappearances, and looting. While the AUC periodically engaged in direct combat with armed guerrilla forces, the vast majority of its victims were civilians targeted by a policy of political and social cleansing, typically rural workers, trade unionists, community activists, human rights defenders, leftist politicians, judicial investigators, indigenous persons, and anyone considered socially undesirable (including suspected petty criminals). Plaintiff's counsel has no knowledge that any of the decedents in this case were actual guerrilla combatants, and many clearly were not.

713. Inhabitants of small towns in contested rural areas were particularly vulnerable. AUC violence has often caused entire communities to disperse, either due to threats of an impending massacre or in the wake of such massacres and the looting and destruction that commonly accompanied them.

714. The AUC grew rapidly in size during the late 1990s and into the twenty-first century. In 1997, it comprised roughly 4,000 combatants. By 2001, Castaño claimed to have 11,000 members, though government estimates put the number somewhere between 8,000 and 9,000. By 2002, AUC forces were present in nearly the whole of Colombia. AUC leaders have claimed before the demobilization process beginning in 2004, the organization comprised as many as 17,000 armed fighters and 10,000 other associates, including informants, cooks, drivers, and computer technicians.

715. Despite their officially illegal status, the AUC and other paramilitary groups in fact collaborated closely with the Colombian government and were used by the government to oppose anti-government guerrilla groups like the FARC. The efforts of the AUC were directed toward the elimination of any alleged guerrilla sympathizer who opposed or complicated the paramilitaries' control of territory or population in the area in

which they exerted their power, or threatened their allies - including the government and the banana companies. The AUC's primary method was terrorism against individuals or communities. To this end, the AUC, like the ACCU before it, routinely engaged in death threats, extrajudicial killings, attacks on civilian populations, torture, rape, kidnapping, forced disappearances, and looting.

716. While the AUC periodically engaged in direct combat with armed guerrilla forces, the vast majority of its victims were civilians. The AUC claimed that it was justified in targeting civilians with no known ties to guerrillas because guerrilla groups required the logistical support of local towns in order to operate in the region. They sought to intimidate and coerce the civilians from providing any support to the guerrillas. Inhabitants of small towns in contested rural areas were particularly vulnerable to AUC attack. AUC violence has often caused entire communities to disperse, either due to threats of an impending massacre or in the wake of such massacres and the looting and destruction that commonly accompanied them. Plaintiffs' counsel has taken evidence from victims of at least thirty massacres in the Urabá region. Eventually, international pressure caused the AUC to abandon this technique in favor of killing their victims one by one, sometimes even moving the victims to separate locations so that the murders would not be counted as massacres.

717. The AUC also targeted anyone considered to share the guerrillas' leftist ideology, such as teachers, community leaders, trade unionists, human rights defenders, religious workers, and leftist politicians. These groups were also seen as problem groups by the banana companies. The AUC also eliminated anyone considered socially undesirable, including indigenous persons, people with psychological problems and other disabilities,

drug addicts, prostitutes, and suspected petty criminals. These social cleansing programs continue in Urabá even today.

718. The abuses of the AUC and its constituent groups, including the ACCU, covered a large area, affected a large population, and were carried out according to a systematic and well-coordinated plan between the government, the paramilitaries, and the companies that financed them. The ACCU operated throughout the banana-growing region of Urabá, as well as in other parts of Colombia. On many occasions from at least 1994 through 2004 they carried out multiple executions or mass-killings of civilians; by 1997, the ACCU and other AUC groups were already responsible for at least 150 such atrocities across Colombia. From its founding, the AUC's activities and abuses have been carried out under the direction of a central command.

719. The AUC and its constituent groups, including the ACCU, have, at least since 1994, been participating in an internal armed conflict in Colombia - a conflict in which the paramilitaries are fighting on behalf of the government against guerrilla forces.

720. The AUC operated two Blocks in Urabá: the Banana Block and the Elmer Cardenas Block. While there had been paramilitaries under the control of the Castaño family in Urabá since the 1980s, the Banana Block was formally created in Urabá in 1994. Ever Veloza García - a/k/a "H.H." - was selected as one of the first commanders. In later years, the Banana Block operated through two fronts: the Turbo Front in Northern Urabá, under the command of H.H., and the Banana Front in the south, led by Raúl Hasbún. The Elmer Cardenas Block was created from elements of the Northwestern Block (Bloque Noroccidental) the Casa Castaño, in the town of Necocli, and elements of Raul Hasbun's Frente Arlex Hurtado of the Banana Block. The Elmer Cardenas Block

was commanded by Freddy Rendón Herrera - a/k/a "El Alemán" - and Elmer Cárdenas himself, until Cárdenas was killed by the guerrillas in 1997. The Elmer Cardenas Block also received men, training, and assistance from the Banana Block. Both Blocks received funding from the Defendant and other banana companies, directly or through the Convivir Papagayo. In addition, a substantial number of Maoist guerrillas of the Ejército Popular de Liberación (Popular Liberation Army, or EPL), later known as Esperanza, Paz y Libertad (Hope, Peace and Liberty, also EPL) joined the AUC after their deadly rivalry with the FARC made preservation of their own lives a higher priority than ideology.

B. The Creation of Convivir Groups to Legitimize the Paramilitaries

721. Although paramilitarism had been declared illegal in Colombia, the Colombian government created a legal mechanism to provide cover and a legitimate avenue of funding for fund the AUC in 1994 through Chapter 5 of Decree 356. Paramilitaries could easily reorganize and continue operating under this Chapter, which allowed private groups to provide for "Special Vigilance and Private Security Services." These security groups, known commonly by their Spanish-language term "Convivir," (meaning "to coexist") were comprised of civilians who received permission from the government for a license to "provide their own security. . . in areas of high risk or in the public interest, which requires a high level of security." Convivir groups were permitted to use arms that were otherwise restricted to use by the military. Defense Ministry, Decree 356, República de Colombia, February 11, 1994, pp. 19- 20; and Resolution 368 of the Superintendencia de Vigilancia y Seguridad Privada, April 27, 1995 (giving the name "convivir" to the security groups).

722. The convivir units in Urabá were fronts for the AUC from their inception. Many were directed and populated by known paramilitaries; this was common knowledge in the region. As H.H. remarked publicly, "Let us not deceive ourselves: all the convivir were ours." The 17th Brigade of the Colombian Armed Forces, which was infamous for its close collaboration with the paramilitaries in Urabá, was given the authority to select members of the convivir in Urabá.

723. Álvaro Uribe, current President of Colombia, was governor of Antioquia at the time of the creation of the convivir groups. Uribe authorized the funding, arming, and funneling of information to the convivir groups, thereby facilitating the sharing of such funds, arms, and information with the AUC. Uribe expected the convivir groups to fight the guerrillas – both alongside the military and on their own, since they were often in a position to engage their opponents before troops could arrive. He justified arming these groups with long-range weapons after noting that their revolvers and smaller weapons were insufficient to combat the guerrillas.

724. On information and belief, the impetus to organize convivir groups in Urabá came from Raúl Emilio Hasbún Mendoza, a banana plantation owner who served as an intermediary between the banana companies and the AUC, and who eventually became commander of the Frente Arlex Hurtado of the AUC's Banana Block. Hasbún approached Uribe in 1997 with the intention of creating a convivir in Urabá. The paramilitaries, the government, and the banana companies saw the convivires as an ideal means of legalizing the companies' payments to the paramilitaries. In just a few months, Urabá had twelve convivir groups.

725. The convivir groups in Urabá facilitated communication and collaboration between the government and paramilitaries. The twelve units functioned as a network and sent intelligence information to both the military and paramilitary commanders such as Raul Hasbún. The military and paramilitaries would both respond to information detailing the location of guerrillas, but often the military would allow the paramilitaries to execute the operations, as they had better resources.

726. One unit, the Papagayo Convivir, received payments from Chiquita and other banana companies and passed the money on to the AUC. The banana companies characterized the payments as security services, but on information and belief, all the banana companies knew or intended that these payments were going to the AUC in order to kill workers and other civilians.

727. In 1997, the Colombian Constitutional Court affirmed the legality of the convivir system but prohibited them from carrying restricted arms or conducting intelligence work. Many convivir groups were dismantled as they did not have a function once these measures were implemented. The Papagayo Convivir was one of only two convivir groups that remained, allowing it to continue facilitating the payments from the banana companies to the AUC. Arnulfo Peñuela, the former director of the Convivir Papagayo and former mayor of Carepa, a town in Urabá, is being prosecuted for ties to the AUC.

C. The AUC Acted Under Color of Authority of the Colombian Government in Committing the Acts Alleged Herein

728. The AUC and other paramilitary groups were founded with the cooperation of the Colombian Government, and were assigned by the Government to combat left-wing

guerrillas through methods including using criminal violence against civilians and unions.

729. The Colombian security forces tolerated and collaborated with the AUC in committing attacks on civilian populations, extra-judicial killings, murders, disappearances, forced displacements, threats and intimidation, including but not limited to the deaths and injuries of the plaintiff sued for herein. As part of the Colombian government's strategy for defeating the left-wing insurgency, high officials in the Colombian civilian government and the Colombian military collaborated with and orchestrated attacks on civilian populations, extrajudicial killings, murders, disappearances, forced displacements, threats and intimidation against persons including the Plaintiffs' decedents.

730. Paramilitarism was State policy in the Republic of Colombia. The Colombian military was not able to effectively address the uprising of the FARC, so the Colombian government facilitated the creation and funding of the AUC with the aim of using this unofficial force to defeat the FARC. As one high commander of the AUC said, "the Colombian military felt itself bound to the Geneva Conventions. The AUC was not." This policy of strengthening the paramilitaries was first developed in Urabá in 1995 to 1997, and then exported to the rest of the country.

731. As a result of this interdependence, longstanding and pervasive ties have existed between the paramilitaries and official Colombian security forces, which include the Colombian Armed Forces and the Colombian National Police, since the inception of the paramilitaries in the 1980s. In the 1980s, paramilitaries were partially organized and armed by the Colombian military and participated in campaigns of the official armed

forces against guerrilla insurgents. Paramilitary forces included active-duty and retired army and police personnel among their members. Although a 1989 government decree established criminal penalties for providing assistance to paramilitaries, the continued existence of military/paramilitary ties has been documented by Colombian non-governmental organizations, international human rights groups, the U.S. State Department, the Office of the U.N. High Commissioner for Human Rights, and the Colombian Attorney General's office. Cooperation with paramilitaries has been demonstrated in half of Colombia's eighteen brigade-level Army units, spread across all of the Army's regional divisions.

732. To date, Colombian authorities have charged some members of Colombia's Congress, seven former lawmakers, the head of the secret police, mayors and former governors with illegally collaborating with paramilitaries. According to testimony of AUC commander Salvatore Mancuso, two current ministers in the present Uribe government, Vice President Francisco Santos and Defense Minister Juan Manuel Santos, met and collaborated with Mr. Mancuso and other AUC leaders, and plotted to extend the paramilitary model to the capital city of Bogotá . Senior officers in the Colombian military, including but not limited to former Military Forces Commanders Major General Manuel Bonett, General Harold Bedoya, Vice Admiral Rodrigo Quinones, Gen. Jaime Uscategui, Gen. Rito Alejo Del Rio, General Mario Montoya, Colonel Danilo Gonzalez, Major Walter Fratinni and Defense Minister Juan Manuel Santos, collaborated with, facilitated, aided and abetted the AUC in the commission of various attacks on civilian populations, extrajudicial killings and other atrocities against civilians, including the plaintiffs, and/or gave tacit support to and acquiescence in their activities. General

Montoya was linked to Diego Fernando Murillo Bejarano (a.k.a. "Don Berna"), successor to Pablo Escobar and former leader of an AUC-affiliated paramilitary group in Medellin. The presence in the military of high ranking staff officers known to have close ties to the AUC and other paramilitaries was widely regarded within the army as tolerance for the paramilitaries.

733. Boundaries between the AUC and the military at times were amorphous, as some paramilitary members were former police or army members, while some active-duty military members moonlighted as paramilitary members and became thoroughly integrated into the groups. Paramilitary leaders noted that Colombian security forces in Urabá allowed members of the AUC to serve as proxies in their pursuit of guerrilla forces, largely due to the military's operative incapacity to defeat the guerrillas on its own. As outside organizations placed increasing pressure and scrutiny upon the military to improve its human rights record, military leaders decided to leave much of their "dirty work" - brutal violence against civilians and suspected paramilitaries in violation of Colombian and international law - to the paramilitaries.

734. Colombian security forces in Urabá - with the knowledge and collaboration of high-level officials in the national government - have therefore habitually tolerated the presence of the AUC, willfully failed to prevent or interrupt their crimes, actively conspired with them, and coordinated activities with them. Documented examples in Urabá include:

- A. Allowing paramilitaries to establish permanent bases and checkpoints without interference, often within short distance of military bases for mutual support;

- B. Failing to carry out arrest warrants for paramilitary leaders, who move about the country freely;
- C. Withdrawing security forces from villages deemed sympathetic to guerrillas, leaving them vulnerable to attack by paramilitaries;
- D. Failing to intervene to stop ongoing attacks on civilian populations occurring over a period of days;
- E. Sharing intelligence, including the names of suspect guerrilla collaborators;
- F. Sharing vehicles, including army trucks used to transport paramilitary fighters;
- G. Supplying weapons and munitions;
- H. Allowing passage through roadblocks;
- I. Providing support with helicopters and medical aid;
- J. Communicating via radio, cellular telephones, and beepers;
- K. Sharing members, including active-duty soldiers serving in paramilitary units and paramilitary commanders lodging on military bases; and
- L. Planning and carrying out joint operations.

735. Accordingly, the AUC became a major combatant in Colombia's civil conflict with the FARC. In most of the rural areas where the FARC had its strongholds, the Colombian military had ceded military operations to the AUC. By 2001, the conflict between the AUC and the FARC had become a notorious exchange of atrocities. The AUC, using tactics of terror on civilians living in and around areas that had been under FARC control, assumed that these innocents were sympathetic to the FARC and systematically murdered thousands of them.

D. The AUC Consistently Operated in Urabá with the Cooperation, Coordination, and Assistance of the Colombian Government When Attacking Civilians

736. The paramilitaries and the government developed and perfected a model of collaboration in Urabá. Politicians, active military units, multinational companies, businessmen, and paramilitaries formed an alliance in order to impose a regime of terror and consolidate a new form of governance, which would wrest control of the countryside back from the leftist guerrillas who had captured many municipalities and were extorting businessmen and landowners. The first paramilitary groups to operate in Urabá in a systematic and continuous manner received special military training.

737. When the government or the military was not able to legally arrest or attack civilians, they would delegate the task to the AUC or to *convivir* associated with the paramilitaries to act on their behalf. According to both H.H. and Raúl Hasbún, a paramilitary commander in Urabá, the military gave the AUC lists of people to kill when they felt impotent to fight the guerrillas themselves legally and constitutionally, or when they could not arrest and try them for any crime.

738. In addition to violently attacking civilians, the paramilitary performed other functions for the military in its war against the guerrillas. For example, at times, the military would arrive in advance of the paramilitaries to tell people to abandon their land; paramilitaries would soon follow to enforce the orders. In 2001, the paramilitaries carried out a food Blockkade in Urabá that severely affected the civilian population in an effort to "decrease the military capacity of the enemy."

739. The AUC in Urabá consistently ran joint operations with the military. The 17th Brigade of the Colombian Army, located in the Urabá region, and the 4th Brigade, sister

unit to the 17th Brigade operating in the Medellin region, were especially active in their support of and involvement in paramilitaries, which include engaging in joint operations. For example, the Elmer Cardenas Block of the AUC received logistical support and transportation from the 17th Brigade and other units of the Colombian army and conducted joint operations.

740. General Rito Alejo del Río Rojas, the commander of the 17th Brigade from 1995-1996 who was responsible for military operations in Urabá, was notorious for his collaboration and collusion with paramilitaries in the region. H.H. has described General Del Río as one of the most important factors in allowing the expansion of paramilitarism in Urabá, because of the cooperation and support he gave the AUC in the regions where the 17th Brigade operated and elsewhere. General del Río was known as the "father of the paramilitaries" because he gave them uniforms and military training. One of his first acts as commander of the 17th Brigade was to establish a military checkpoint at a tunnel passing through the Cañon de Llorona near to Dabeiba in Urabá. The responsibility for maintaining this checkpoint was soon taken over by the AUC. Dozens of the Decedents in the instant action were murdered at this location by the AUC and thrown into the river.

741. General del Río is currently in custody on a military base in Bogota and is on trial for his collaboration with the AUC. He is accused of conspiracy to murder and perjury in relation to a previous investigation of General del Río in which he was accused of ordering his men to patrol alongside the AUC, and for presenting civilians murdered by the AUC as guerrillas killed in combat. The prior investigation was dismissed. H.H. has testified that he twice witnessed Del Río meeting with the founder and national commander of the AUC, Carlos Castaño. Salvatore Mancuso, who succeeded Castaño as

national commander, testified that Del Río met with him and other commanders to coordinate the paramilitaries' expansion throughout northern Colombia.

742. AUC paramilitaries could enter and leave the 17th Brigade's headquarters at will, with the knowledge and permission of General del Río. In one instance, H.H. discovered that an individual the AUC was searching for was being held at the Brigade headquarters; he and others from the AUC went to the 17th Brigade, picked up the prisoner, transported him to the port at Turbo using a military van, and murdered him. Salvatore Mancuso reported a similar story. Furthermore, on his visits to the 17th Brigade - during which he often planned joint operations with General del Río and then-Captain Bayron Carvajal, H.H. was consistently allowed to recruit soldiers for the AUC.

743. General del Río's role in promoting and supporting paramilitarism was not merely the work of a single rogue military officer; rather it was part of the Colombian government's strategy to fight the guerrillas. Many other army brigades had similar relationships with paramilitaries, including the 11th Brigade. Gloria Cuartas, then the mayor of Apartadó, and others, complained repeatedly and provided evidence to the General's superiors about his collusion with paramilitaries, but their complaints were ignored. Colonel Carlos Alfonso Velasquez Romero, a 17th Brigade officer, was investigated and discharged in January 1997 on the order of Army Commander Harold Bedoya when he tried to report on the General and the 17th Brigade's close association with the AUC.

744. In October 1997 members of the Army's 4th Brigade reportedly established a perimeter around the village of El Aro, in Antioquia. While the Army prevented entry and escape, members of the AUC entered the village and over a period of five days

executed at least eleven people, burned most of the houses, looted stores, and destroyed pipes that fed the homes potable water. Although this massacre did not occur in Uraba, it was perpetrated by the 17th Brigade, which is based in Carepa, Uraba, and shows that the army brigade based on Uraba traveled to other parts of the country to engage in joint operations with the AUC.

745. Upon leaving the village, the paramilitaries forcibly disappeared over thirty more people and compelled most of the residents to flee. In 1998, numerous members of Colombia's security forces, including members of the 17th Brigade and local police forces, were arrested and charged with various crimes related to their involvement with certain AUC activities, including the sponsorship and formation of illegal paramilitary groups, conspiracy and homicide.

746. On February 19, 2000, the AUC selectively assassinated five banana workers in the "peace community" of San Jose de Apartadó, in Urabá, and reports indicated that members of the 17th Brigade were direct participants in the attack.

747. When asked to rank their collaboration between the AUC and the Colombian military on a scale of one to 10, H.H. rated it as a 10, with 10 being maximum collaboration, specifically citing the helpfulness of General del Río and Colonel Carvajal.

748. This model of collaboration between the paramilitaries, the companies, and the government was so successful in Urabá that Raúl Hasbún explained it to Jorge 40, commander of the AUC in Magdalena, so he could implement it in that region. Thereafter, the model spread to many other regions of Colombia.

749. The AUC took on numerous state functions in Urabá, including the maintenance of security and order, the disposition of personal and commercial disputes, the provision

and regulation of social services, and the imposition of social rules. The AUC was the de facto government of Urabá and other regions in Colombia.

750. The AUC performed state functions in Uraba. Banana companies and others paid taxes to the AUC in order to protect themselves and their investments. They also dispensed justice in disputes between individuals, punished individuals viewed as criminals, and became involved in social issues. The paramilitary organization's involvement in residents' daily lives reached the extent of intervention in domestic issues, disputes between neighbors, collection of debts, and truancy from school. Of primary importance was the control of traffic on roads through the jungle region of Uraba. Checkpoints on all major roads were (and at times, still are) maintained by the paramilitaries, to screen travelers for wanted persons, and to control the flow of cocaine, which the AUC taxed to finance their activities.

751. The banana-growing area of Urabá is located within the Department of Antioquia in northwest Colombia, near the Panamanian border. Before the 1960s, the region was lightly populated, mostly by indigenous communities, and remained isolated from the central government. The United Fruit Company, the predecessor to Chiquita, developed the Urabá region in the early 1960s and created a Colombian subsidiary, Banadex. Individual farms were owned by Colombian businessmen. Many workers migrated to the region as the banana industry grew.

752. Workers faced harsh living and working conditions on the banana farms in the 1960s and 1970s. Urabá's first unions, Sintrabanano and Sintagro, were founded in the 1960s and 1970s. However, the banana growers maintained control by killing and firing

any organized workers. The army occupied banana plantations and assisted banana growers by arresting union leaders or forcing laborers to work during strikes.

753. Two anti-government guerrilla groups, the FARC and the EPL, became active in Urabá as a result of the labor struggles in the 1980s. The FARC took control of Sintrabanano and EPL infiltrated Sintagro. The guerrillas forced the banana companies to accept unions and negotiate with the workers. By 1985, the two guerrilla groups began competing for workers to join their unions in order to gain more territorial control, forming mutually opposed "EPL farms" and "FARC farms." In 1988, however, they agreed to unite under the combined Sintrainagro union; by the end of 1989, they had achieved wage increases and managed to call attention to the problem of poor housing conditions.

754. The success of the unions was accompanied by increased paramilitary violence, and many unionists were murdered during strikes and attempted negotiations. Sintrainagro lost many members in the violence, including some of its most active and radical leaders. This precipitated a new split in Sintrainagro. EPL leaders in the union believed that the only way to save the union was to associate with the paramilitaries. Many EPL guerrillas demobilized in 1991, forming a new EPL party and signing a "social pact" with the banana growers and Sintrainagro to collaborate on regional development. Banana growers provided 23 million pesos for the reinsertion process. The paramilitaries encouraged Sintrainagro's alignment with the banana growers and paramilitaries by killing any outspoken leaders advocating for workers' rights. The FARC, in turn, massacred many of the demobilized EPL guerrillas to discourage their alignment with the banana growers.

755. After the formation of the AUC's Banana Block in 1994, the intra-union violence increased. The paramilitaries took advantage of the internal battle between guerrilla forces, working with the government in the final EPL reinsertions and in the process convincing many demobilized EPL guerrillas to join their side and continue fighting the FARC. The war intensified, as government forces and their paramilitary allies used increased violence against the FARC and any suspected guerrilla sympathizers. As Carlos Castaño boasted, by the late 1990s the AUC achieved their goals of expelling the FARC from Urabá and suppressing the unions, such that no strikes occurred on the banana plantations.

756. Urabá was also used by the paramilitaries and guerrillas for their drug and arms trade. The proximity of Urabá to the Panamanian border, and its isolation from the central government made Urabá a strategic location for such illicit markets, and therefore Urabá was an important location for the success of both the guerrillas and paramilitaries, both of whom participated in the illicit trade in drugs and arms.

E. Chiquita's Support of the AUC

757. Chiquita, as the successor to the United Fruit Company and the Frutera Sevilla company, has been involved in the production and exportation of produce from Central and South American nations, including Colombia, for over a century. At all relevant times, Chiquita produced bananas in the Urabá region of Colombia.

758. On information and belief, from not later than 1995 until at least 2004, Chiquita provided material support, including money and services to the AUC and its predecessors. Chiquita's assistance helped the paramilitaries to consolidate as a decisive actor in the political, military, and social terrain of the banana region. In exchange for its

financial support to the AUC, Chiquita was able to operate in an environment in which labor and community opposition to their operations and policies was suppressed.

759. From 1995 until at least February 2004, Chiquita provided material support to the AUC in Urabá. By 1997, the AUC effectively controlled a large amount of territory - particularly in the towns and urban areas - and also exerted influence in institutions such as labor organizations and local governments in these regions.

760. In 1995 and 1996, Chiquita made payments directly to the AUC's Banana Block.

761. Chiquita paid the AUC nearly every month during the period 1997-2004, making over one hundred payments to the AUC, totaling over \$1.7 million. During those years, the AUC killed an estimated 3,700 people and displaced approximately 60,000 in its war on the guerrillas.

762. Chiquita's payments to the AUC were reviewed and approved by senior executives of the corporation, including high-ranking officers, directors, and employees. Chiquita's senior executives knew that the corporation was paying the AUC and that the AUC was a violent, paramilitary organization led by Carlos Castaño.

763. Some of Chiquita's payments were made directly to the AUC or to front organizations like the Papagayo Convivir. The majority of direct payments were made in the form of checks written to the convivir, drawn on Banadex's Colombian bank account. Chiquita concealed the nature of these payments by recording them in corporate books and records as "security payments" or payments for "security" or "security services."

764. In September 2000, the results of an investigation into Chiquita's payments to the AUC, which had been carried out by in-house Chiquita attorneys, were reported to the company's Audit Committee. By March 2002, individuals who had been present at the

presentation of the investigation implemented new procedures with regard to Chiquita's payments to the AUC. Under the new procedures, Banadex executives received checks with the intent that they would be withdrawn as cash and handed directly to the AUC. The individuals who received the checks withheld the corresponding tax liability and reported and paid income tax as if the payments were actually being made to them. Chiquita made payments in this way in order to conceal the fact that they were paying the AUC; it recorded these payments simply as income contributions.

765. Chiquita formed an agreement with the AUC, paying them in exchange for their services in pacifying the banana plantations and suppressing union activity. This agreement specified that Chiquita would pay the paramilitaries a fixed amount for each box of bananas exported.

766. At all relevant times, Chiquita knew that the AUC was a violent terrorist paramilitary organization, as its brutal aims and tactics were a well-known feature of the Colombian civil war. On September 10, 2001, the United States government designated the AUC as a Foreign Terrorist Organization ("FTO"). That designation was well-publicized in the American public media, including in the *Cincinnati Post* on October 6, 2001, and in the *Cincinnati Enquirer* on October 17, 2001, as well as in the Colombian media.

767. On October 31, 2001, the Secretary of State of the United States designated the AUC as a Specially-Designated Global Terrorist. As a result of the SDGT designation, it has been a crime for any United States person to, among other things, willfully to engage in transactions with the AUC, without having first obtained a license or other authorization from the Office of Foreign Assets Control.

768. In 2003, Chiquita consulted with attorneys from the District of Columbia office of a national law firm ("outside counsel") about Chiquita's ongoing payments to the AUC. Outside counsel advised Chiquita that the payments were illegal under United States law and that Chiquita should immediately stop paying the AUC directly or indirectly. Among other things, outside counsel advised Chiquita:

"Must stop payments."
(notes, dated February 21, 2003)

"Bottom Line: CANNOT MAKE THE PAYMENT"
"Advised NOT TO MAKE ALTERNATIVE PAYMENT through CONVIVIR"
"General Rule: Cannot do indirectly what you cannot do directly"
"Concluded with: CANNOT MAKE THE PAYMENT"
(memo, dated February 26, 2003)

"You voluntarily put yourself in this position. Duress defense can wear out through repetition. Buz [business] decision to stay in harm's way. Chiquita should leave Colombia."
(notes, dated March 10, 2003)

"[T]he company should not continue to make the Santa Marta payments, given the AUC's designation as a foreign terrorist organization[.]"
(memo, dated March 11, 2003)

"[T]he company should not make the payment."
(memo, dated March 27, 2003)

769. Although Chiquita's Board of Directors agreed to disclose its payments to the AUC to the U.S. Department of Justice on or about April 3, 2003, on April 8, 2003, Chiquita instructed Banadex to continue making the payments to the AUC. On April 24, 2003, Chiquita met with Justice Department officials, who told Chiquita the payments were illegal.

770. Defendant Chiquita continued to pay the AUC after it was designated a Foreign Terrorist Organization, until at least 2004, and through several intermediaries described infra in §J, ¶¶ 838-855, through 2007.

771. On March 19, 2007, Chiquita pled guilty in U.S. District Court for the District of Columbia to one count of engaging in transactions with a specially designated global terrorist. The company's sentence included a \$25 million criminal fine, the requirement to implement and maintain an effective compliance and ethics program, and five years' probation.

772. The cases in the instant action generally fall outside of the 1997-2004 date range of the payments admitted in Defendant's criminal plea, and their claims accrued on different dates, depending on the plaintiffs were reasonably on notice of Defendant's potential liability for their claims. Claims for injuries occurring in 1995-1996 did not accrue until Ever Veloza made a statement about payments during that time period, which was reported by *Al Jazeera* on June 10, 2009. See ¶¶ 855-859 infra. Claims for injuries occurring between 2004-2007 did not accrue until September 5, 2009, when *El Espectador* reported on Defendant's continuing payments to the AUC between 2004-2007. See ¶¶ 838-855, infra. Claims based on the testimony of Freddy Rendon Herrera would not have accrued until November 25, 2009. See ¶¶ 871-876, infra. Other claims would not have accrued until March 19, 2007, when Defendant's guilty plea was reported in the press. By reason of the foregoing, any statutes of limitation were equitably tolled until these dates, and accordingly, the claims of all plaintiffs herein are timely brought.

1. Chiquita' facilitation of the AUC's arms shipments

773. In 2001, Chiquita facilitated the clandestine and illegal transfer of arms and ammunition from Nicaragua to the AUC.

774. The Nicaraguan National Police and Army were involved in a deal that provided 3,000 AK-47 assault rifles and 5 million rounds of ammunition to a private Guatemalan arms dealership, Grupo de Representaciones Internacionales S.A. ("GIR S.A."), in exchange for weapons more suited to police work. GIR S.A., in turn, arranged to sell the AK-47s and ammunition for \$575,000 to Shimon Yelinek, an arms merchant based in Panama. In November 2001, Yelinek loaded the arms onto the Otterloo, a Panamanian-registered ship, with Panama as its declared destination. On information and belief, this ship is owned by one of Defendant Chiquita Brands' corporate officers.

775. Instead of docking in Panama, the Otterloo instead went to Turbo, Colombia, where Chiquita, through Banadex, operated a private port facility for the transport of bananas and other cargo.

776. After the Otterloo docked at the port in Turbo, which is at least partly controlled by Defendant, Banadex employees unloaded crates containing the assault rifles and ammunition. On information and belief, the AUC, which had free access to the port, then loaded these rifles onto AUC vehicles and took possession of them.

777. Chiquita was aware of the use of these facilities for the illegal shipment of arms to the AUC, and intended to provide such support and assistance to the AUC. The documents accompanying the shipment declared that the crates that in fact contained arms were filled with plastic and/or rubber balls. However, in unloading the crates, the Banadex employees used heavy lifting machinery that would not have been necessary to

move the crates' declared cargo. After being off-loaded, the crates then remained at Chiquita's facilities for at least two additional days before fourteen AUC vehicles arrived to take possession of the arms. At least some of the arms were received by Freddy Rendón Herrera, the commander of the Elmer Cárdenas Block of the AUC in Urabá.

778. A highly-placed Chiquita employee from the port Turbo, Giovanni Hurtado Torres, as well as several Colombian customs officials, have been prosecuted for their purposeful involvement in the Otterloo transaction.

779. On information and belief, Chiquita facilitated at least four other arms shipments to the AUC. One of these shipments of arms through the Turbo port involved the entry of 4,200 assault rifles. One of the shipments was received by Raul Hasbun, the aforementioned individual who commanded the Frente Arlex Hurtado of the Banana Block, and arranged Chiquita's payment scheme with the AUC.

780. On at least one occasion, José Leonardo Lopez Valencia, an electrical mechanic at Turbo, witnessed uniformed AUC members offloading crates directly from a Chiquita ship. On information and belief, those crates contained smuggled firearms.

781. In an interview with the Colombian newspaper *El Tiempo*, AUC leader Carlos Castaño subsequently boasted, "This is the greatest achievement by the AUC so far. Through Central America, five shipments, 13 thousand rifles."

782. The arms that Chiquita knowingly aided the AUC to procure have been of substantial assistance to the AUC in its commission of untold crimes, including the killings and other conduct alleged herein. Many of these guns have not been turned in to the government and are still in use by the AUC and the paramilitary groups which emerged after the AUC was formally demobilized. In 2008, some were seized in Urabá

from Daniel Rendón Herrera's "Heroes de Castaño" front, "neo-paramilitary" group comprised of AUC members who did not demobilize in 2005. The raid, executed by Colombian authorities, netted hand grenades, mortar rounds, Claymore mines, electrical detonators, and 47 AK-47 assault rifles. Serial numbers of the assault rifles were traced to the 2001 Otterloo shipment.

2. Chiquita's Facilitation of the AUC's Drug Shipments

783. Chiquita also assisted the AUC by allowing the use of its private port facilities for the illegal exportation of large amounts of illegal drugs, especially cocaine. The drug trade was a major source of income for the AUC, and Chiquita allowed the AUC uncontrolled access to its port facilities and ships for the purpose of smuggling drugs.

784. Colombian prosecutors have charged that the AUC shipped drugs on Chiquita's boats carrying bananas to Europe. According to H.H., the AUC would tie drugs to the hulls of banana ships at high sea to evade the control points of the security agencies.

785. Cocaine hidden in Defendant's banana shipments has been seized by the Colombian government on seven separate occasions. More than one and a half tons of cocaine have been found hidden in Defendant's produce, valued at over 33 million dollars. Two of the ships on which drugs were found were named the Chiquita Bremen and the Chiquita Belgie.

786. On information and belief, drug shipments could not have been attached to Chiquita's banana boats without the active collusion or willful ignorance of Chiquita employees. These employees could have prevented this drug trade and assistance to the AUC, but these employees knowingly and purposely allowed use of Chiquita's port and banana transportation boats for this purpose.

F. Chiquita's Conduct Aided and Abetted the AUC's Conduct Alleged Herein.

787. Chiquita's conduct aided and abetted the killings and other conduct alleged herein, which constitute war crimes; crimes against humanity; torture; cruel, inhuman and degrading treatment; violations of the rights to life, liberty and security of person and peaceful assembly and association; and terrorism, among other violations of Colombian, Ohio, Florida, New Jersey, the District of Columbia, United States, and international law. Chiquita substantially assisted the AUC paramilitaries who personally undertook the wrongful acts alleged herein, and knew that its actions would assist in the wrongful acts at the time it provided the assistance.

788. As to the first element of aiding and abetting, the killings alleged in this complaint constitute war crimes; crimes against humanity; torture; cruel, inhuman and degrading treatment; violations of the right to life; and terrorism, among other violations of Colombian, New Jersey, Florida, Ohio, the District of Columbia, United States, and international law.

789. Chiquita's payments and facilitation of drug shipments contributed significantly to the perpetration of the crimes committed by the AUC by improving its financial situation and enabling it to purchase weapons and other war materials.

790. Payments from Chiquita and other banana companies constituted a significant portion of the AUC's budget in some areas. This was a substantial factor in the violent crimes subsequently committed by the AUC in these areas.

791. In addition to Chiquita's payments and facilitation of drug shipments, its assistance to the AUC in smuggling arms substantially and directly increased the paramilitaries' capacity to carry out atrocities.

792. The vast majority of the thousands of machine guns transferred to the AUC from the Otterloo shipment have never been recovered and, on information and belief, are still in the hands of the AUC, where they and other similarly obtained firearms have been used in the commission of the war crimes, crimes against humanity, and other violations alleged in this complaint. Plaintiffs incorporate by reference ¶¶ 773-786 as if fully set forth herein.

793. Chiquita knew that its actions would assist in the illegal or wrongful activity and other conduct alleged herein at the time it provided the assistance. Chiquita knew that its actions would assist in the killings. The AUC's use of violent tactics, including extrajudicial killings, to terrorize innocent civilians living in areas under FARC control was well known in Colombia and was widely reported in the press in Colombia and the United States. In 1997, for example, the State Department noted:

[t]he many paramilitary groups took the offensive against the guerrillas, often perpetrating targeted killings, massacres, and forced displacements of the guerrillas' perceived or alleged civilian support base . . . An active policy of depopulation, pursued by some paramilitary groups against communities suspected of guerrilla support, was the primary cause of the growing internal displacement problem.

United States Department of State, *1997 Human Rights Report: Colombia*, at 2.

In 1999, the State Department noted:

Paramilitary groups and guerrillas were responsible for the vast majority of political and extrajudicial killings during the year. Throughout the country, paramilitary groups killed, tortured and threatened civilians suspected of sympathizing with guerrillas in an orchestrated campaign to terrorize them into fleeing their homes, thereby depriving guerrillas of civilian support. The AUC

paramilitary umbrella organization . . . exercised increasing influence during the year, extending its presence through violence and intimidation into areas previously under guerrilla control.

Id. at 2.

794. The United States government designated the AUC as a Foreign Terrorist Organization on September 10, 2001, and that designation was well-publicized in the American public media. The AUC's designation was even more widely reported in the public media in Colombia, where Chiquita had its substantial banana-producing operations.

795. Chiquita had information about the AUC's designation as an FTO specifically and global security threats generally through an Internet-based, password-protected subscription service that Chiquita paid money to receive. On or about September 30, 2002, a Chiquita employee, from a computer within defendant Chiquita's Cincinnati headquarters, accessed this service's "Colombia - Update page," which contained the following reporting on the AUC:

"US terrorist designation. International condemnation of the AUC human rights abuses culminated in 2001 with the US State Department's decision to include the paramilitaries in its annual list of foreign terrorist organizations. This designation permits the US authorities to implement a range of measures against the AUC, including denying AUC members US entry visas; freezing AUC bank accounts in the US; and barring US companies from contact with the personnel accused of AUC connections."

796. From on or about September 10, 2001, through on or about February 4, 2004, Chiquita made 50 payments to the AUC totaling over \$825,000. Chiquita never applied for nor obtained any license from the Department of the Treasury's Office of Foreign Assets Control with respect to any of its payments to the AUC.

797. On or about February 20, 2003, two Chiquita officials had a conversation about one official's discovery that the AUC had been designated by the United States government as a Foreign Terrorist Organization. Shortly thereafter, the two officials spoke with outside counsel about Chiquita's ongoing payments to the AUC.

798. Outside counsel advised Chiquita, through the two officials, that the payments were illegal under United States law and that Chiquita should immediately stop paying the AUC directly or indirectly.

799. Despite the February 26, 2003 communication from counsel advising Defendants against making payments to the AUC, on or about February 27, 2003, two Chiquita employees in Colombia paid the AUC in Urabá by check in an amount equivalent to \$17,434.

800. Despite the March 27, 2003 communication from counsel advising Defendants against making payments to the AUC, on or about March 27, 2003, the same two employees paid the AUC in Urabá by check in an amount equivalent to \$19,437.

801. Chiquita intended that its actions would assist the AUC in committing the specific acts alleged in the complaints - to target and kill civilians and union members in Urabá.

802. Chiquita's acts of assistance to the AUC were made with the intent that the AUC carry out the acts of killing and other conduct alleged herein. In exchange for its financial support to the AUC, Chiquita was able to operate in an environment in which labor and community opposition was suppressed. Chiquita's assistance was not given out of duress; rather it was part and parcel of the company's proactive strategy to increase profitability and suppress labor unrest by exterminating the FARC in the Urabá region.

803. Chiquita, along with other banana companies in Colombia, sought a meeting with the paramilitaries in late 1996 or early 1997. The meeting took place in Medellín, and a high level U.S. Chiquita employee was present. It was decided at this meeting that the banana companies would pay the paramilitaries. Carlos and Vicente Castaño led the negotiations with the companies; as a result of the negotiations, H.H. was ordered to patrol the entire banana-growing region.

804. On information and belief, in order to operate its banana production in an environment free of labor opposition and social disturbances, Chiquita agreed to a business arrangement whereby the company would pay the AUC a certain amount per box of banana exported, and would help to arm and otherwise support the AUC and other terrorist groups during the period of the killings and other conduct alleged herein. (Testimony of Salvatore Mancuso and H.H. in the Commission of Justice and Peace)

805. The arrangement between Chiquita and the AUC was not one of duress; in fact, it was the banana companies that approached the AUC to initiate their relationship. Mario Iguaran, then- Attorney General of Colombia, has charged that there was a criminal relationship between Chiquita and the AUC in which Chiquita supplied money and arms to the AUC in return for the "bloody pacification of Urabá."

806. As part of its deal with Chiquita, the AUC provided protection services to banana plantations, dealing out reprisals against real or suspected thieves, as well as against social undesirables, suspected guerrilla sympathizers or supporters, and anyone who was suspected of opposing the AUC's activities or social program.

807. By arming and financing the AUC, Chiquita intended to benefit from the AUC's systematic killings of civilians. After its agreement with Chiquita, the AUC understood

that one goal of its campaign of terror was to force laborers to work in the plantations. Anyone who disobeyed the order knew what would happen to them. For example, one individual who worked in Chiquita's offices at a plantation in Urabá, was present when paramilitaries arrived at the plantation and summarily executed a banana worker who had been seen as a troublemaker because his slow work held up the production line. Another individual saw paramilitaries arrive to threaten banana workers after a salary dispute. Chiquita's assistance also helped the AUC to gain access to its perceived opponents who worked for the company. José Gehiener Arias Ramirez, a Chiquita employee who was later killed by the AUC, repeatedly witnessed AUC members entering the Chiquita packing house to threaten workers from the Barrio Policarpa, whose residents were viewed as hostile to the AUC.

808. Carlos Castaño wrote in his book, *Mi Confesión*, that the unions were strong and "terrifying" before the paramilitaries arrived in Urabá, and that they had turned to crime as well as starting extensive worker strikes. In concert with the army, which assisted banana growers by occupying banana plantations and arresting union leaders or forcing laborers to work during strikes, the AUC undertook an extensive campaign of murdering civilians in order to break the back of the unions. According to Gloria Cuartas, "They pulled out a map where they said which plantations allegedly had a FARC presence and started killing workers and union members, until the organizational structures of the union and the board of Sintrainagro were left totally in the hands of the 'Esperanzados' [the EPL]," a former insurgent group that had been coopted by the paramilitaries.

809. The stability and social control provided by the AUC was to Chiquita's benefit, in that it minimized the expenses incurred and eliminated disruptions in the exportation of

bananas. As a result of the AUC's actions, Chiquita was able to dismantle the social assistance programs to which the banana companies had agreed through negotiations with the unions in the 1980s, thereby lowering costs. The influence of the AUC in the leadership of the banana workers' trade unions was also to Chiquita's benefit, as it reduced labor strife.

810. As a result of the paramilitaries' intervention, Castaño was able to brag in 2001 that "in the past three years there have been no strikes in the banana-growing region, and the Sintrainagro unions work shoulder-to-shoulder with the employers to promote the [economy of the] zone."

811. In addition to directly suppressing labor activity, the paramilitaries regulated the banana-growing population and protected Chiquita's profitability by controlling the provision of medical services in the towns of Urabá. Residents of Apartadó reported that they feared seeing doctors because they believed that medical personnel were under the control of the AUC. On information and belief, this arrangement benefited Chiquita because it allowed the paramilitaries to inform the company of its employees' medical issues that could potentially affect labor productivity, including pregnancy. It also allowed the paramilitaries to prevent doctors from certifying worksite injuries or providing medical excuses to workers, which would have raised costs for the company.

G. Chiquita Joined the AUC's Conspiracy to Commit the Acts Alleged Herein

812. By its conduct, Chiquita joined the AUC's conspiracy to eliminate the FARC through violent attacks on guerrillas and suspected guerrilla sympathizers and terrorization of the civilian population. The killings alleged herein, which constitute war

crimes; crimes against humanity; torture; cruel, inhuman and degrading treatment; violations of the rights to life, liberty and security of person and peaceful assembly and association; and terrorism, among other violations of Colombian, Florida, New Jersey, Ohio, District of Columbia, United States, and international law, were committed by members of the AUC in furtherance of the conspiracy. Chiquita's actions constituted conspiracy in that (1) two or more members of the AUC agreed to carry out their terrorist campaign against civilians, (2) Chiquita joined the conspiracy knowing of at least one of the goals of the conspiracy and intending to help accomplish it, and (3) one or more of the violations alleged herein was committed by someone who was a member of the conspiracy and acted in furtherance of the conspiracy.

813. Members of the AUC agreed to fight the FARC by means of illegal violence against particular classes of civilians, thereby constituting a conspiracy of two or more persons who agreed to commit a wrongful act.

814. The AUC was formed based on agreement between its leaders, government backers, and private supporters, to eliminate the FARC through extermination of guerrillas and suspected guerrilla sympathizers and the systematic terrorization of the civilian population. The AUC purposely targeted civilians, even those with no known ties to the guerrillas. Thus the use of illegal, violent means, including war crimes and extrajudicial killings, was always central to the group's mission and strategies. Chiquita joined the conspiracy knowing that the AUC intended to fight the FARC by means of illegal violence against particular classes of civilians, and intending to help accomplish that goal.

815. Chiquita began conspiring with the paramilitaries in 1995 or earlier; its first direct

payments to the Banana Block of the AUC were made no later than 1995. Chiquita sought a meeting with the paramilitaries in late 1996 or early 1997, and concluded an agreement with the AUC whereby Chiquita paid the paramilitaries for their services supporting their banana plantations. These services consisted of threatening or killing civilians, including workers who attempted to strike, union leaders, alleged criminals, and small banana farmers who refused to sell or abandon their land. Chiquita knew of the AUC's goal of eliminating the FARC through the killing of suspected sympathizers and innocent civilians.

816. Chiquita also knew of the AUC's primary tactic of targeting civilians in order to intimidate this population from supporting the FARC.

817. Chiquita joined the conspiracy intending to benefit from this strategy; the AUC's methods would reduce Chiquita's costs and risk exposure by suppressing labor unrest through the elimination of those who opposed the banana plantations or threatened their profitability.

818. Chiquita, as a co-conspirator, arranged illegal money payments, smuggled drugs and arms, and facilitated and condoned murders in furtherance of the conspiracy.

819. The AUC's conduct alleged herein were committed by members of the AUC in furtherance of the conspiracy's goal of fighting the FARC by means of illegal violence against particular classes of civilians.

820. All of Plaintiffs' decedents were killed by the AUC in furtherance of the conspiracy. Their status as social activists, unionists, alleged criminals, or victims of FARC extortion led to their being suspected by the AUC as FARC supporters or otherwise threats to public order and ultimately to their murders.

H. The AUC Acted as Chiquita's Agent in Committing the Acts Alleged Herein

821. Chiquita formed an agreement with the AUC, paying them in exchange for their suppression of union activity and elimination of alleged FARC supporters and other undesirables. This agreement specified, among other things, that Chiquita would pay the paramilitaries a fixed dollar amount for each box of bananas exported.

822. Plaintiffs incorporate by reference ¶¶ 757-772, above, detailing the payments made to the AUC from 1995 through February of 2004.

823. Chiquita intended that the AUC commit the killings and acts alleged herein when it made an agreement with the AUC. In providing the AUC with money and assistance with their arms and drug trafficking, Defendants intended that the AUC obtain arms and continue their practice of killing civilians, especially those civilians who were perceived as threats to the profitability of the banana industry.

824. The leadership of the AUC did, in fact, carry out killings of union members, social organizers and other undesirable groups knowing that Chiquita expected and intended that they do so using the arms and money provided by Chiquita.

825. The AUC's conduct alleged herein was committed in furtherance of Chiquita's business.

826. The AUC solved Chiquita's labor problems and kept down operational costs by killing and/or intimidating any worker that attempted to strike. Plaintiffs incorporate by reference ¶¶ 708-720, 728-729, 736-756, 801-811, above. The paramilitaries also dealt out reprisals against real or suspected thieves and social undesirables, and targeted suspected guerrilla sympathizers or supporters who could have threatened Chiquita's

operations, including anyone espousing views that could be characterized as leftist, such as vocal union and community leaders.

827. The AUC's conduct alleged herein was authorized or subsequently acquiesced in by Chiquita. Chiquita authorized the killings and other conduct alleged herein in advance. The AUC's agreement with Chiquita involved forcing people to work using threats and illegal violence, as well as the quelling of labor and social unrest through the systematic terrorization of the population of Urabá.

828. Furthermore, Chiquita acquiesced in the AUC's conduct after the fact by continuing to pay them despite full knowledge that their support was being used to carry out the crimes alleged herein. These payments continued even after the AUC was designated as a Foreign Terrorist Organization, and even after Chiquita was advised by the Department of Justice that the payments were illegal. Plaintiffs incorporate by reference ¶¶ 766-772, above.

829. On information and belief, the monetary payment made by Chiquita and the other support and assistance provided by Chiquita to the AUC contributed to the AUC's ability to flourish and consolidate its power in the regions impacted by the AUC's acts of terror and mayhem. The assistance, financial and otherwise, provided by Chiquita to the AUC, facilitated the AUC's ability to carry out such acts with impunity. The acts of terror and violence were designed to instill fear and control in the regions affected.

I. The harms resulting from Defendant's support continue even today.

830. Defendant's support of the AUC, and the facts and circumstances surrounding the AUC's activities, as alleged in §§ A-H above, resulted in harms which continued after Defendant stopped paying the AUC, and still continue today.

831. The Defendant has always been the primary developer of the banana growing region of Urabá, and the AUC also originated there. Urabá is still one of Colombia's most violent regions, as well as one of Colombia's main centers for paramilitarism and drug trafficking.

832. The largest and most powerful paramilitary group in Colombia today is called the *Urabeños*, and is based in Urabá. It is comprised mainly of former AUC members who did not demobilize in 2005 along with the leadership of the group. The *Urabeños* are one of dozens of violent drug cartels that emerged in Colombia following the demobilisation of the paramilitary Self-Defence Forces of Colombia (AUC) in 2005. It is led by two brothers who took over following the arrest last year of the drug lord Daniel Rendon Herrera, also known as Don Mario. Based in Uraba, from where the group gets its name, the *Urabeños* have embarked on a national expansion with the apparent aim of becoming the biggest drug cartel in Colombia, according to news articles published by the BBC's Colombian correspondent, Jeremy McDermott.³ The *Urabeños* still keep several thousand men under arms, and have continued to murder individuals such as the first 121 Decedents in the instant complaint.

833. In addition to this continuing harm, the Defendant continued to support the AUC and its successor groups, including the *Urabeños*, for at least three additional years, beyond what Defendant has admitted. This apparently violates Defendant's plea agreement in the associated criminal case in the U.S. District Court for the District of Columbia.

834. Both Freddy Rendon Herrera and his brother, Daniel Rendon Herrera, are indicted in the Southern District of New York in case 08-cr-659, on drug trafficking charges. The

³ *Colombia police claim anti-drugs success*, British Broadcasting Corp., October 7, 2010.

extradition of these individuals is a matter of considerable controversy. Daniel Rendon Herrera is accused by the U.S. Department of Justice of re-forming the Elmer Cardenas block of the AUC after it was demobilized in 2005 under the name "Los Paisas," and then renaming it the "Autodefensas Gaitanistas de Colombia." According to the indictment in case 08-cr-659, this group is believed to have shipped some 300 tons of cocaine to the United States between 2005-2007.

835. The Colombian Fiscalia has found cocaine hidden in Defendant's banana shipments on seven separate occasions. See "A indagatoria, tres directivos norteamericanos de Chiquita Brands Inc.," *El Tiempo*, Dec. 7, 2009.⁴ More than one and a half tons of cocaine have been found hidden in Defendant's produce, valued at over 33 million dollars. Id. Two of the ships on which drugs were found were the named the Chiquita Bremen and the Chiquita Belgie. Id. This shows that the relationship between Defendant and the AUC was one which allowed the AUC easy access to Defendant's port facilities and ships.

836. On January 16, 2008, a raid on Daniel Rendon Herrera's group by Colombian authorities in Uraba netted hand grenades, mortar rounds, Claymore mines, electrical detonators, and 47 AK-47 assault rifles. See "Don Mario, narco ligado a los hermanos Castaño, es ahora el capo más buscado del país," *El Tiempo*, Feb 9, 2008.⁵ Of particular interest to investigators was the fact that the AK-47's could be traced to Otterloo shipment described supra at ¶¶ 773-782. Id. Of the more than 3500 AK-47's brought into Colombia on this ship, only small part have been surrendered to authorities as part of the Justice and Peace program. Id. This is evidence that many, if not most of the

⁴ Online at http://www.eltiempo.com/colombia/justicia/a-indagatoria-tres-directivos-norteamericanos-de-chiquita-brands-inc_6748587-1

⁵ Archived online at https://www.fac.mil.co/index.php?idcategoria=25578&facmil_2007=a6d17fc

weapons imported into Colombia using Defendant's facilities are still in the hands of illegal armed groups today. It also shows a specific link between support provided by Chiquita Brands to the Elmer Cardenas Block of the AUC, as well as its successor organizations under the command of Daniel Rendon Herrera.

837. Daniel Rendon Herrera did not voluntarily demobilize, as did the other AUC commanders mentioned in this Complaint. When he was finally captured in April 2009, he commanded an estimated 5,000 men under arms.⁶ The group has now renamed itself the "Urabeños," and continues to control and terrorize the region of Urabá.

J. According to the national Colombian prosecutor's office, Defendant continued to financially support the AUC through 2007 using Colombian alter egos.

838. The Colombian newspaper *El Espectador* reported that the Defendant continued to finance the AUC from 2004-2007, even while the Defendant was cooperating with an investigation of the U.S. Department of Justice.⁷

839. The *El Espectador* article is based on investigative documents leaked to the newspaper from the Colombian Fiscalía, the national prosecutor's office in Colombia (hereinafter "Fiscalia") on July 22, 2008. *Id.* According to the article, payments were made to AUC front organizations by two Colombian corporations, Invesmar S.A., and Olinsa, S.A., both of which are controlled by Defendant. A financial analyst working for the Fiscalía came to this conclusion by tracing banking transactions of of these organizations, and that of Banacol, S.A. *Id.* Banacol, S.A. is a Colombian corporation

⁶ "Don Mario, el poderoso nuevo capo de la droga en Colombia," Gonzalo Guillén, *El Nuevo Herald* (Miami), April 15, 2009

⁷ "Chiquita sigue en Colombia," Redacción Judicial, *El Espectador*, Sept 5, 2009, online at <http://www.elespectador.com/impreso/judicial/articuloimpreso159808-chiquita-sigue-colombia>, hereinafter "Chiquita sigue en Colombia."

which bought Defendant's assets in Colombia in approximately 2004, and continues to be the primary supplier of Colombian bananas for Defendant. *Id.* These companies are alter egos of the Defendant.

840. On November 11-12, 2008, a commission of the Colombian CTI (Cuerpo Tecnico de Investigacion, the national forensic investigative body) conducted a judicially-authorized search of Olinsa, SA's corporate office in Medellin. *Id.* According to *El Espectador's* reporting on the Fiscalia's report, Olinsa and Defendant Chiquita Brands did not keep separate bookkeeping systems, and were run as one company. *Id.*

841. The *El Espectador* report is based on leaked documents of the Colombian national prosecutor's office, which should be discoverable through the letters rogatory process. Similarly, Colombian prosecutors involved in that investigation could be deposed or could testify as witnesses at trial.

842. Olinsa S.A., whose full name is Opción Logística Integral, S.A., is a Colombian corporation formed in April of 2005 by Gloria Andrea Cuervo Torres, an ex-Chiquita Brands employee who was in a position of authority when she worked for Defendant. Ms. Cuervo Torres, along with twelve other Chiquita Brands employees and ex-employees, are defendants in an indagatoria in Colombia for their payments to the AUC.⁸

See Chiquita sigue en Colombia, *supra* at n. 7.

843. The following employees or former employees of Defendant are also subjects of the Colombian indagatoria reported in Sept of 2009: Cyrus Freidheim, Charles Keiser, Roderick M. Hills, Robert Olson, Robert Kistingner, Carl H. Lindner, Keith Linder, Cyrus

⁸ An indagatoria is a Colombian criminal proceeding which follows a formal indictment, comparable to an American trial, but sometimes extending for years.

Freidheim Jr., Robert Fisher, Jeff Zalla, Steve Warshaw and Dorn Wenninger. Id. On information and belief, all of these individuals are U.S citizens.

844. Olinsa, SA received more than \$1 million U.S. dollars in start-up money from the Defendant to buy computers and communications equipment. Id. The *Fiscalía* discovered that from 2005 to 2008 Chiquita Brands provided more than \$5 million U.S. dollars to Olinsa, S.A., and that Olinsa, S.A.'s primary client was Chiquita Brands. An estimated 98% of Olinsa S.A.'s revenue came from Defendant during this period. For example, in 2007, received \$10,981,000 in revenue, of which \$10,763,000 were generated by business with Defendant Chiquita Brands. Id.

845. Olinsa, S.A.'s contracts with Defendant to provide quality control, maintenance and repair of shipping containers, and logistical support to its banana business continue today. Olinsa, S.A. has about 90 employees, in Barranquilla, Urabá, Santa Marta y Medellín. Id.

846. The same managers who previously ran Banadex, S.A., Defendant's wholly-owned Colombian subsidiary, now run both Banacol, SA and Olinsa, SA., and the latter two corporations loan each other workers as needed. Another corporation called Invesmar S.A. was formed in the British Virgin Islands, and is believed by Colombian prosecutors to be owned by an international conglomerate which also owns Banacol S.A. Id. This conglomerate is called Convite, S.A. Id. The ownership of Invesmar, S.A. by Convite, S.A. is also described in an article in *Semana* magazine, called "Los para-subsidios," by María Jimena Duzán, Nov. 7, 2009.⁹ *Semana* is a leading news magazine in Colombia.

⁹ Online at <http://www.semana.com/noticias-opinion/parasubsidios/131035.aspx>

847. *El Tiempo*, the main newspaper in Colombia, reported that on about December 4, 2009, the Colombian Fiscalía notified Thomas Black, an official of the US Department of Justice, that three US citizens had been indicted (notified of an indagatoria) in Colombia, for aggravated conspiracy and for financing the AUC in Colombia.¹⁰ The three men, John Paul Olivo, Charles Dennis Keiser, and Dorn Robert Wenninger, are employees of Defendant Chiquita Brands. Id. Citing unnamed sources in Washington, the newspaper also reported that the letter rogatory requested information about 19 other employees of the Defendant, who are corporate officers and directors of the Defendant, as well as 4 of Defendant's employees in Central America. Id. The letter was based on inspections of financial records in Colombia, as well as the testimony given by the following AUC leaders: Salvatore Mancuso; Raúl Emilio Hasbún Menzoza; Ever Veloza Garcia, and Freddy Rendón Herrera. Id.

848. According to another report by the same newspaper,¹¹ the Colombian Fiscalía has been investigating the Defendant and its employees since at least 2007, when news of the criminal case in the United States was made public. In December of 2007, the Colombian Fiscalía made a formal request for judicial assistance from the U.S. Department of Justice in investigating employees of the Defendant and three other banana companies, in request number 1000007839. Id. The employees are under investigation for aggravated conspiracy and for financing illegal armed groups. Id. The prosecutor responsible for this case, Fiscal #29 in Medellín, named Alicia Dominguez,

¹⁰ "A indagatoria, tres directivos norteamericanos de Chiquita Brands Inc.," *El Tiempo*, Dec. 7, 2009, online at http://www.eltiempo.com/colombia/justicia/a-indagatoria-tres-directivos-norteamericanos-de-chiquita-brands-inc_6748587-1

¹¹ "Multinacional Chiquita y a otras 3 bananeras serán investigadas por dar recursos a los paramilitares," *El Tiempo*, December 17, 2009, online at: http://www.eltiempo.com/justicia/2007-12-18/ARTICULO-WEB-NOTA_INTERIOR-3864573.html#

ordered the capture of Raul Hasbun in connection with this investigation. Id. The other three companies under investigation include Unibán (owned by the family of Raul Emilio Hasbun), Probán, and Sunisa. Id.

849. *El Tiempo* further reported that the Defendant's employees under investigation in 2007 included Robert Fisher, Steven G. Wars, Carl H. Linder, Durk Jaguer, Jeffrey Benjamin, Morten Amtzen, Roderick Hills, Cyrus F. Freidheim and Robert Olson.¹² Reinaldo Escobar de la Hoz, a Banacol, S.A. employee prosecuted for the entry of 5,000 machine guns into Colombia on the Otterloo in 2001, testified in this investigation. Id. See ¶¶ 773-782 supra, the section of this complaint describing arms trafficking.

850. In January of 2009, the Fiscalía sent another request for judicial assistance to the U.S Department of Justice, requesting assistance in investigating 20 high level employees of the Defendant.¹³ Included among them is the Defendant's current President, Fernando Aguirre. Id. The letter rogatory, authored by a prosecutor appointed by the Colombian Supreme Court, named the following individuals as the subjects of the request: Cyrus Freidheim, Roderick Hills, Robert Olson, Morten Arntzen, Jeffrey Benjamin, Robert Kintinger, James W. Fischer, Carl Linder, Keith Linder, Steve Warshaw, David Ocleshaw, Durk Pager, Jaime Sierra, Steven Stanbrook, Fernando Aguirre, Hill Albrinck, Cyrus F. Freidheim Jr., Mario Méndez, Bill Tsacalis and Alejandro Bakoczy.

851. The Fiscalía has also requested information related to Defendant's alleged bribery of Colombian customs officials at this port, including the phone calls of John Walker, who was allegedly an employee of Defendant at the Zungo port. Id.

¹² "Diez ex directivos de Chiquita fueron incluidos en investigación de la Fiscalía por pagos a las Auc," *El Tiempo*, Dec. 18, 2007, online at: http://www.eltiempo.com/justicia/2007-12-19/ARTICULO-WEB-NOTA_INTERIOR-3865998.html

¹³ *El Tiempo*, January 13, 2009

852. According to a current Banacol employee, when Defendant Chiquita Brands dissolved its Colombian subsidiary, Banadex, the following banana farms in Urabá were sold to Banacol. These farms continue to supply bananas to Defendant Chiquita Brands: Chambacu, Tatiana, Finca, Paraiso, Monterrey # 1, Finca # 1, Monterrey # 2, Monterrey # 3, Maryland, Cibeles, Montecarlo, Yerbazal, Guadalupe, Santa Maria Del Monte, El Reino, La Mariana, Cantarrana, El Carmen, Chispero, La Arrocerá, Finca # 4, Trigana # 1, Indira, Finca # 3, San Joaquin # 1, San Joaquin # 2, Juana Pio, Doña Francia, El Salvamento, Las Virginias, La Esperanza, Rita Maria, Durazno, Magdalena, Taparto, Rancho Amelia, Salpicon, Tarena, Guadalupe, Doña Angela, Guaro, Maria Rosario, Villa Alicia, San Jacinto, Manzana, Cafetal, Por Francia, Alex Maria, Diamante, Retiro, Lejanía, Finca, Hacienda, Virginias, Trigana, Carmen, Alameda, Negritos, Malagon, Sol Luna, Arrocerá, Caribe, Guaimara 1, Lucitania, Sierra Morena, Tabano, Venecia, and Sarzamora.

853. Until the week of June 15, 2009 employees working on Banacol farms still had employment contracts with Banadex. During this week, the farms' management made a tour of the farms, and at each one, had their employees cancel their old Banadex contracts and sign new ones with Banacol. The contracts did not expire normally at the end of their terms. Benefits programs such as health insurance and pension programs were also transferred from Banadex to Banacol at this time.

854. In September of 2009, the Director of Banacol, Ruben Caballero, gave about a week's worth of testimony in Medellin in an investigation of the sale of land in Urabá and elsewhere at low prices, apparently under pressure from the AUC. A group of about 500 plaintiffs brought an action against AUC Commander Raul Hasbun, to try to recover their

lands. This case has been in court for several years now, and apparently involves Banacol, as well as Raul Hasbun and his company, Uniban.

K. According to the top AUC commander in the Uraba region, Ever Veloza Garcia, Defendant's payments to his unit began in 1995, not in 1997, as Defendant claims.

855. Ever Veloza Garcia was the top commander of the "Banana Block" which operated in Uraba and was responsible for killing thousands of people. Mr. Veloza demobilized in about 2005, and has given extensive testimony to the Commission of Justice and Peace, including confessing to ordering more than 3000 individual homicides in Uraba, many of which are represented in this case.¹⁴ He is currently incarcerated in the MDC in New York.

856. In addition to admissions made in his testimony, Mr. Veloza has given numerous interviews to the news media. In the summer of 2009, the Al Jazeera news agency produced an in-depth report about Defendant's role in the AUC's campaign in Colombia.¹⁵ *Al Jazeera* interviewed Ever Veloza Garcia inside the building of the Colombian Fiscalia, immediately one of his appearances in the Commission of Justice and Peace. In his interview with Al Jazeera, Ever Veloza was filmed saying the following:

"I confessed to 70 murders of unionists in 1995 alone. One of my tasks was to make people work and to avoid strikes against the bosses. There were so many murders already in the area, they wanted to bring the banana region under their control." *Id.*

¹⁴ Number of homicides quoted in "'H.H' se confiesa," *El Espectador*, August 2 2008, online at www.elespectador.com. Other sources estimate that HH has confessed to more than 3600 homicides made by his group in the Uraba region. Thousands more have been confessed by other members of the AUC, including alias El Indio, an AUC commander in Apartado who confessed to approximately 800 murders.

¹⁵ "Chiquita: Between Life and Law," by Juliana Rufus, *Al Jazeera*, June 10, 2009, online at <http://www.youtube.com/watch?v=ONCTOiKT42U>.

"We arrived in the middle of the violence to lift the burden from the banana companies. They didn't give us money to kill specific individuals, but with the money we were given we bought rifles and ammunition." Id.

"So they way it was we went to the fields and explained that there was a new law, the law of Carlos Castaño. There were new rules and the law at the time was our law. Strikes that harmed the banana industry's economy were totally forbidden. In a short time, using violence and the power of the rifle, we took away the rights that they had fought for." Id.

"We didn't force anyone to have us. I mean they came to us voluntarily. Chiquita has already recognized that in the U.S.A." Id.

"I think they need to act as we are in doing this, because they are more responsible than us. Because they had only one goal, which was money. Thousands murdered. Thousands orphaned, widowed. An area desolated. It was a war. A total war. They are more responsible than us. They have to be put on trial as we are." Id.

857. *Al Jazeera* also interviewed two union members on camera, without disclosing their identities. Id. The first said:

"When the paramilitaries turned up on the plantations, they said, from today we are the law and you have to do what we say. They would come and grab someone. They would tie his hands and feet, sometimes use chainsaws, pliers, to break them into pieces so they would speak. Pull their nails out so they would speak. Witnesses have said that those being tortured would speak. People were frightened and they would give up a name, thinking that the paramilitaries would let them go, they would invent anything." Id.

The second union member said:

"The question is, where did the money to pay the paramilitaries come from? Our wages were reduced. The money came from our wages. We were paying for the people who were killing us."

858. Ever Veloza Garcia also gave a video interview with Hollman Morris (HM), a Colombian journalist, in which he described how a system was devised in 1997 to launder payments through private security companies which acted as front organizations,

for the AUC.¹⁶ According to Veloza Garcia, prior to that time, payments had been made directly to the Castaño brothers, who led the AUC, in cash. In this interview, Ever Veloza (EVG) said:

EVG Banana companies paid up until the time when we demobilized because as I said in... I believe Convivir started in Uraba in '97 and through it, payments from banana companies to Self Defenses became legal, and they paid up until the day when we demobilized, that is to say all, of the banana companies paid, and that is not so just because we affirm it, there are the accounting records of Convivir, showing all of the payments by banana companies.

HM They all knew that they were paying the paramilitary groups?

EVG Of course.

(break)

HM Mr. Veloza, something that calls my attention is the subject of Convivir, who, who is, let's say, the person who says "OK, here we have to... we need to create Convivir?"

EVG Raul Hasbun.

HM Uhuh.

EVG Raul Hasbun was a businessman, from a family of banana growers, who joined the Self Defenses. When he joined the Self Defenses he said that the payments had to be legalized so that the companies would not encounter legal problems in the future. Convivir had been created recently and we took advantage of that legal entity to launder the moneys for the Self Defenses.

HM In what year was that?

EVG 97.

HM Year 1997. So then, what is the banana growers' strategy, start boosting Convivir?

EVG No, Convivir was created by ("Pedro") Raul Hasbun, and banana companies made payments to Convivir, the payments that had previously been made to the Castaños, are now made directly to Convivir as a Security service, a legal service.

¹⁶ Contravia, Holman Morris' taped interview with Ever Veloza, December 2008, online at <http://www.youtube.com/watch?v=wIYpGIHq9YQ>

(break)

HM Forgive me for insisting on this subject but it is very important. Did all of the banana growers in Uraba know that the payments needed to be legalized through Convivir?

HH Banana growers knew that they were paying us, it was the banana growers who brought the AUC into Uraba, and the banana grower always paid the AUC, consciously knowing that it was the AUC.

HM But those same banana growers were negotiating with politicians to provide political support?

HH No, Convivir was something very easy to set up, very easy, and as Pedro did it so easily, it was decided that they would be set up to operate legally from a financial standpoint, so Convivir remained; they were established by the AUC to collect funds.

HM Any Antioquia politician, who was doing politics in Uraba, who wanted votes in Uraba, had to know that Convivir was a façade of the paramilitarism?

HH In Uraba everybody knew that Convivir was a façade for the paramilitarism.

859. On September 26, 2008, Ever Veloza testified about payments made from Defendant during the years 1995-1996, in response to questions asked of him in the Commission of Justice and Peace. This was in his trial for the murders of Walter de Jesus Borja David and Elmer Antonio Urquijo Beltran, the heirs of whom are represented by counsel in the instant Complaint. Ever Veloza confessed to these murders, and also confirmed that Defendant Chiquita Brands paid the Bloque Bananero of the AUC beginning in 1995. According to a transcript from this hearing, Ever Veloza said:

"It was no secret to anyone that the banana companies supported us from when we made incursions into the zone of Uraba, equally, North American companies like Chiquita Brands among others, and this was happening since 1995."

L. Another important AUC commander in the Uraba region, Raul Hasbun, denies that Chiquita was extorted by the AUC.

860. Emilio Raul Hasbun Mendoza (hereinafter "Raul Hasbun") was another top-level commander of the AUC in Uraba, who led the Frente Arlex Hurtado, one of two fronts of the Banana Block of the AUC. He was roughly equal in importance to Ever Veloza Garcia, with Veloza in charge of the northern half of Uraba, and Hasbun in charge of the south. Raul Hasbun is also the heir to his father's enormous banana business in Colombia, called Uniban, and until his incarceration, functioned as its chief executive officer. Raul's father Pedro established his company in the Magdalena region of Colombia decades ago. When Chiquita relocated its business center to Uraba, the Hasbun family also moved their business to Uraba. Raul Hasbun demobilized from the AUC in November of 2004.

862. Raul Hasbun was the person who worked with Defendant to set up a system of front organizations to attempt to legitimize what had heretofore been off-the-books, cash payments. In a telephone interview with Steven Dudley of the *Miami Herald*,¹⁷ Raul Hasbun said "I am the one who established the system" of banana companies paying the AUC through convivir front organizations set up for that purpose. He stated that all the banana companies paid the AUC, and that he has the checks to prove it. "But there came a time when I no longer had to ask." Id. The article continues:

"I killed a lot of union members," Hasbún said flatly. "But I didn't kill them because they were part of a union. I killed them because they were working with the guerrillas or they were guerrillas." The system of having banana-producing companies pay for the paramilitaries came together during a meeting in late 1996 in Medellín, Hasbún said. Among those attending, he said, was a high-level U.S. official of Chiquita who regaled the paramilitary chiefs with stories of his time as a soldier in Vietnam. "Is that something someone who is being extorted does?" Hasbún asked. "He loved telling these stories." Id.

¹⁷ "Colombian paramilitary tells how he financed his own Murder Inc.: bananas," by Steven Dudley, The Miami Herald, 3/21/2009.

863. During his testimony in the Commission of Justice and Peace during the summer of 2009, Raul Hasbun was asked the following question: "Ever Veloza says that the Banana Block was financed by Chiquita Brands not only between 1997 and 2004, as they admit, but also in 1995 and 1996. What do you know about this?" Mr. Hasbun asserted his right to remain silent, the only time he did so in any of his testimony. After asserting this right, the prosecuting judge advised Mr. Hasbun that his benefits under the Law of Justice and Peace would be jeopardized if he did not tell the whole truth, and that this would be the result of asserting his right to remain silent. Hasbun still declined to respond.

864. Raul Hasbun has stated on another occasion that he expects to be out of jail in a few years, and that it is not in his interest to harm his friends in the banana industry by testifying against them.

865. Raul Hasbun has also stated that Chiquita's payments to the AUC were entirely voluntary, and that if Chiquita had not paid, the AUC would not have retaliated against them.

866. In other testimony in the Commission of Justice and Peace, Raul Hasbun described the entry of 4,200 assault rifles (believed to be AK-47's), which he received through the Zungo port, which was, at least in part, controlled by the Defendant.¹⁸ This was a separate shipment from the Otterloo shipment, which involved a ship owned by Defendant, in which thousands of AK-47s were delivered to another AUC commander

¹⁸ "A indagatoria, tres directivos norteamericanos de Chiquita Brands Inc.," El Tiempo, Dec. 7, 2009, online at http://www.eltiempo.com/colombia/justicia/a-indagatoria-tres-directivos-norteamericanos-de-chiquita-brands-inc_6748587-1

Freddy Rendon Herrera. Id. These arms shipments through Chiquita's port facilities show, at a minimum, that the AUC had unchecked access to Defendant's property.

867. In other testimony given in the Commission of Justice and Peace during the summer of 2009, Raul Hasbun admitted that his unit was financed by charging a tax of \$50 per kilogram of cocaine passing through territory he controlled. One half of the tax was paid to the Casa Castano, or the central command of the AUC, and the other half was kept for local expenditures.

868. In a large number of the cases in the instant complaint, the victims were taken onto property owned by Raul Hasbun and his family, and executed there. The Uniban banana company is owned by Raul Hasbun and other members of his family.

869. According to information we have received during our investigation, approximately 30-50 young men were abducted and forced to unload Mr. Hasbun's containers onto trucks. The men were then taken to an AUC camp in Taraza, Antioquia, where they were disappeared. Plaintiffs' counsel represent the heirs of at least one of the disappeared individuals.

870. Víctor Manuel Henríquez, a member of the Board of Directors of Banacol, S.A., has testified in court that his sister is married to one of the sons of AUC commander Raul Hasbun. "Chiquita sigue en Colombia," supra at ¶ 838 n. 7. By making payments to the AUC and emergent paramilitary groups between 2004-2007, as alleged in the El Espectador report, by purchasing all of Chiquita's assets in 2004, and by being Defendant's exclusive supplier of bananas from the Uraba region since 2004, Banacol has acted as Defendant's alter ego since 2004.

M. AUC commander Freddy Rendon Herrera, has made statements in court proceedings demonstrating how Defendant's support of the Bannana Block affected a wider geographic area.

871. Freddy Rendon Herrera, alias "El Aleman," was overall commander of the Elmer Cardenas Block of the AUC, which operated in rural parts of Uraba and Choco. The Elmer Cardenas Block was formed after the Banana Block, and received men, training, and assistance from the Banana Block, which was in the pay of the Defendant. Id.

872. The murders and other injuries alleged herein are connected to Defendant through more than mere geographical proximity. Defendant's material support can be traced to the specific units of the AUC operating where Plaintiffs' family members were killed. (regions under the control of the Banana Block and Elmer Cardenas Block)

873. Freddy Rendon Herrera has described, in his testimony to the Commission of Justice and Peace, how his unit, the Elmer Cardenas Block, was started with assistance from Raul Hasbun. According to Freddy Rendon, one of the first units in his block was the Frente Pedro Ponte. Id. Pedro Ponte is an alias used by Raul Hasbun. This front consisted of men formerly under the command of Raul Hasbun, and acted as a nucleus for the nascent Elmer Cardenas front. Id.

874. Members of the Banana Block were also used as trainers for the Elmer Cardenas block, teaching members not only military tactics, but also terror tactics, such as how to cut a human body into quarters - a technique used in several of the cases alleged herein. For example, alias "Platino" and alias "Rosso" of the Banana Block organized the Escuela Gabriela White in Dabeiba, where many of the incidents alleged herein occurred.

875. On about November 25, 2009, Freddy Rendon Herrera confessed to receiving approximately 3,000 AK-47 machine guns, and about 5,000,000 cartridges for them,

from the Otterloo shipment, in his testimony in the Commission of Justice and Peace.¹⁹ The Commission of Justice and Peace determined that on Nov, 5, 2001, the Otterloo arrived at the Zungo port in Carepa, in Uraba, loaded with 14 containers of arms and ammunition from El Rama, a port in Nicaragua. *Id.* The Otterloo and the Zungo port were under the effective control of Defendant Chiquita Brands at the time, and on information and belief, the Otterloo was owned by one of Defendants' corporate officers.

876. Freddy Rendon also described how his incursion into the Choco region was supported by the 17th Brigade of the Colombian army, which among other things, transported his men by boat. Freddy Rendon testified about meeting with the police commander in Quibdo, the capital of the Choco department, along with Raul Hasbun in order to obtain the cooperation of the Choco police in their Choco campaign. *Id.* This shows that the state action element can also be met with respect to the activities of the Elmer Cardenas Block.

VI. GENERAL ALLEGATIONS

877. At all times, Defendants knew or should have known that the AUC was a violent paramilitary organization continually engaging in vicious crimes and human rights violations against civilians in Colombia, including extrajudicial killing, torture, and forced disappearances. The acts described herein were inflicted under color of law and under color of official authority, and/or in conspiracy with, and/or in a joint criminal enterprise with, and/or in concert with, and/or on behalf of those acting under color of official authority. The AUC has carried out its activities with both the tacit approval and

¹⁹ "El 'Alemán' aceptó traficar armas de las Fuerzas Armadas," El Pais, Nov, 25, 2009, online at <http://www.elpais.com.co/paionline/notas/Noviembre252009/alemanacceptacargos.html>

active cooperation of official government security forces pursuant to the overall war strategy of the Colombian government. Moreover, high ranking officials from across the Colombian government have been implicated in paramilitary collaboration, including at least fourteen current members of Congress, seven former lawmakers, the head of the secret police, mayors, and former governors. Furthermore, Chiquita's payments to the AUC were facilitated by Convivir, which are licensed by and operate with the express authority of the government.

878. The acts described herein were conducted in the course of an internal armed conflict as part of the Colombian government's war strategy. The AUC and other paramilitaries were parties to this armed conflict who engaged in combat with guerrilla armies on behalf of the government. They committed the abuses against Plaintiffs and decedents as part of their prosecution of this conflict. The AUC and other paramilitaries were also engaged in this conflict in partnership with the Colombian military. The acts described herein were part of a widespread and systematic attack by the paramilitaries against the civilian population of the banana-growing region, as well as against several discrete sub-populations, including but not limited to leftist politicians, labor organizers, community activists, persons considered socially undesirable, and perceived guerrilla sympathizers. This attack spanned a large swath of land in Colombia, resulted in the deaths of thousands of individuals, and was directed by a centrally-commanded paramilitary organization. On information and belief, at all relevant times Chiquita had knowledge of these attacks.

879. The defendants' acts had a substantial effect upon the success of the violations of international law.

880. The defendants were aware that their acts and omissions assisted in the violations of international law.

881. The defendants acted willfully, wantonly and recklessly, with the intent to aid the terrorist acts of the AUC, with deliberate and conscious disregard of the fact that its actions would aid, abet and further the terrorist activities of the AUC.

882. The acts and injuries to Plaintiffs and decedents described herein were part of a pattern and practice of systematic human rights violations requested, paid for, ordered, confirmed, aided and abetted, and/or ratified by Chiquita and/or committed in conspiracy with the AUC.

883. As a direct and proximate result of Chiquita's unlawful conduct, Plaintiffs have suffered and will continue to suffer harm including pain and suffering, personal injuries, property damages, harm to their livelihoods, and extreme and severe mental anguish and emotional distress. Plaintiffs are thereby entitled to general and compensatory damages in amounts to be proven at trial.

884. Plaintiffs' causes of action arise under and constitute torts under the following laws, agreements, conventions, resolutions and treaties:

- a) Alien Tort Claims Act, 28 U.S.C. § 1350;
- b) Torture Victims Protection Act, 28 U.S.C. § 1350, note;
- c) Customary International Law;
- d) Common law of the United States of America;
- e) Statutes and common law of the States of New Jersey, Florida, Ohio, the District of Columbia or any other applicable jurisdiction, including but not limited to wrongful death, assault and battery, intentional infliction of emotional distress,

negligent infliction of emotional distress, negligence, negligent hiring and supervision, civil conspiracy, and loss of consortium; and the

f) Laws of Colombia.

885. Legal action by Plaintiffs in Colombia would be futile. In June 2004, Chiquita sold its Colombian subsidiary Banadex. On information and belief, Chiquita no longer owns any production operations in Colombia and is not subject to service there. Furthermore, the political and legal system in Colombia is characterized by virtual impunity for the crimes of paramilitaries and those who assist them. The vast majority of arrest warrants for paramilitary leaders are never carried out, and when such figures are arrested they are frequently released or allowed to escape from security facilities. Military officers accused of collaboration with paramilitaries are routinely exonerated or given token sentences by military courts. Prosecutors, investigators, and judicial officials who pursue cases of human rights abuses implicating paramilitaries are subject to death threats and assassinations, and many have had to resign or flee the country as a result.

886. Legal action by Plaintiffs in Colombia would also result in serious reprisals. Individuals who seek redress for paramilitary crimes committed against them or their family members are regularly targeted for further retributive violence.

887. Chiquita took actively concealed its payments and other forms of support to the AUC.

888. This concealment had the effect of preventing plaintiffs from learning that Chiquita was responsible for their injuries. Plaintiffs were unaware of Chiquita's support of the AUC until shortly after Chiquita's guilty plea in March of 2007.

889. Chiquita's concealment of its role in Plaintiffs' injuries prevented Plaintiffs from filing their claims at an earlier date.

890. Plaintiffs were additionally unable to bring suit in Colombia or the United States until 2007 due to the poor security situation and the danger of reprisals, to which Chiquita's support of the AUC contributed.

891. Several of the AUC paramilitary units active in the banana-growing region, including the Bloque Elmer Cárdenas, did not demobilize until 2006.

892. Throughout this period, paramilitaries continued to kill and make threats against civilians in the banana-growing region. In 2006, several human rights workers received death threats, including lawyers challenging paramilitary violence.

FIRST CLAIM FOR RELIEF

(Extrajudicial Killing)

893. The allegations set forth in the above paragraphs are re-alleged and incorporated by reference as if fully set forth herein.

894. The deliberate killings, under color of law, of Plaintiffs were not authorized by a lawful judgment pronounced by a regularly constituted court affording all the judicial guarantees which are recognized as indispensable by civilized people.

895. The conduct alleged herein constitute extrajudicial killings in violation of the Alien Tort Statute (28 U.S.C. § 1350), the Torture Victim Protection Act (28 U.S.C. § 1350 note), customary international law, the common law of the United States, the statutes and common law of New Jersey, Florida, Ohio, the District of Columbia, the laws of Colombia, and the international treaties, agreements, conventions and resolutions described in the paragraphs above.

896. The AUC committed acts of extrajudicial killing in that they carried out deliberate killing of Plaintiffs' decedents 2) not authorized by a previous judgment pronounced by a regularly constituted court affording all the judicial guarantees which are recognized as indispensable by civilized peoples.

897. Defendants are liable to Plaintiffs in that they aided and abetted, directed, ordered, requested, paid, were reckless in dealing with, participated in a joint criminal enterprise with, confirmed, ratified, were the principals of, and/or conspired with the AUC, which was acting under color of law by collaboration with the Colombian military, to bring about the extrajudicial killings committed against Plaintiffs.

898. The AUC's killings were carried out deliberately as part of the role assigned to them by the Colombian State to repress support of the FARC, but unauthorized by a judgment pronounced by any court

899. As alleged above, AUC acted as a government in and of itself and its relationship with the government made it a state actor in Colombia.

900. The AUC killed Plaintiffs' decedents as part of the Colombian state policy of intimidating civilians from supporting the FARC. The AUC committed many of these murders in the presence of family members or other community members, or they subsequently reported to the family that they were responsible for the killings. They openly killed civilians and discussed such killings in public in order to intimidate and threaten others.

901. While the state supported the AUC in these efforts, they did not authorize them to commit these killings through a court judgment. In fact, AUC leaders have stated that the

military would give them names of alleged guerrillas to kill when the state did not have enough evidence to prosecute the individuals through Colombian courts.

902. None of decedents was killed pursuant to any judicial process at all.

903. Plaintiffs incorporate by reference ¶¶ 708-720, 728-729, 736-756, 801-811, of this complaint, detailing why Plaintiffs' decedents were killed by the AUC and characterized as FARC sympathizers. Killing plaintiffs' decedents was part of the general strategy of the AUC. Through these murders, the AUC intended to deter others from expressing views that could be construed as supporting the FARC or their ideology.

SECOND CLAIM FOR RELIEF

(Crimes Against Humanity)

904. The allegations set forth in the above paragraphs are re-alleged and incorporated by reference as if fully set forth herein.

905. The conduct alleged in this complaint includes willful killing, torture, and arbitrary arrest and detention, constituting crimes against humanity in that the AUC carried out these acts as part of a widespread or systematic attack against a civilian population. Leaders, organizers, instigators, and accomplices participating in the formulation of these acts are responsible for all acts performed by any person in execution of such plan. The acts of the AUC constitute crimes against humanity, regardless of whether the AUC acted under color of state authority.

906. The crimes against humanity described herein constitute torts that give rise to federal jurisdiction under the Alien Tort Statute, (28 U.S.C. § 1350), as well as violations of customary international law, and the common law of the United States, the statutes and

common law of New Jersey, Ohio, and Florida, the District of Columbia, and the laws of Colombia.

907. Defendants are liable to Plaintiffs in that they aided and abetted, directed, ordered, requested, paid, were reckless in dealing with, participated in a joint criminal enterprise with, confirmed, ratified, were the principals of, and/or conspired with the AUC in bringing about the crimes against humanity committed against Plaintiffs.

908. From late 1996 on, the AUC became a major combatant in Colombia's civil conflict with the FARC. In most of the rural areas where the FARC had its strongholds, the Colombian military had ceded military operations to the AUC. By 2001, the conflict between the AUC and the FARC had become a notorious exchange of atrocities. The AUC, using tactics of terror on civilians living in and around areas that had been under FARC control, assumed that these innocents were sympathetic to the FARC and systematically murdered thousands of them. The AUC became known for using chain saws and machetes to dismember its victims in order to ensure that witnesses to this violence would never harbor or assist FARC guerrillas in their villages.

909. The AUC killed thousands of civilians in Urabá. Their war strategy involved targeting civilians in towns near guerrilla groups in order to intimidate the population from providing any support to the guerrillas. This included anyone supporting the guerrillas' ideology, such as teachers, community leaders, trade unionists, human rights defenders, religious workers, and leftist politicians.

910. Decedents were all killed as part of a systematic attack on particular societal groups. Plaintiffs incorporate by reference ¶¶ 708-720, 728-729, 736-756, 801-811, above. In fact, all of Plaintiffs' decedents were executed by the AUC as it used tactics of

terror and violence, particularly in the areas that the FARC had a stronghold. They were not merely incidental victims during a time of war; rather they were victims of the AUC's war strategies and goals in furtherance of the conspiracy.

911. According to the U.S. Department of State, "paramilitary groups took the offensive against the guerrillas, often perpetrating targeted killings, massacres, and forced displacements of the guerrillas' perceived or alleged civilian support base... An active policy of depopulation, pursued by some paramilitary groups against communities suspected of guerrilla support, was the primary cause of the growing internal displacement problem."

THIRD CLAIM FOR RELIEF

(Torture)

912. The allegations set forth in the above paragraphs are re-alleged and incorporated by reference as if fully set forth herein.

913. The conduct alleged herein constitute extrajudicial killings in violation of the Alien Tort Statute (28 U.S.C. § 1350), the Torture Victim Protection Act (28 U.S.C. § 1350 note), customary international law, the common law of the United States, the statutes and common law of New Jersey, Florida, Ohio, the District of Columbia, the laws of Colombia, and the international treaties, agreements, conventions and resolutions described in the paragraphs above.

914. The AUC committed acts of torture in that they intentionally caused Plaintiffs and their decedents to suffer severe mental or physical pain or suffering for the purpose of punishing, intimidating or coercing Plaintiffs and their decedents.

915. Defendants are liable to Plaintiffs in that they aided and abetted, directed, ordered,

requested, paid, were reckless in dealing with, participated in a joint criminal enterprise with, confirmed, ratified, were the principals of, and/or conspired with the AUC, which was acting under color of law by collaboration with the Colombian military, to bring about the extrajudicial killings committed against Plaintiffs.

916. Plaintiffs' decedents were in the custody of the AUC when they were tortured and killed. In many cases, family members of various next of kin witnessed AUC members seeking out their relatives and executing them. Others were removed from the banana farms and executed by the AUC, who later told their family members about the killings. The AUC had effective control of Plaintiffs' decedents by use of their weapons.

917. The AUC caused the decedents severe mental and physical pain in their torture and execution.

918. The AUC caused the Plaintiffs severe mental and physical pain in witnessing or learning of the murders of their family members. Individual Plaintiffs also experienced suffering in being threatened against pursuing an investigation of the death, being forced to flee the area, and feeling threatened and frightened that the AUC would also target them.

919. Plaintiffs incorporate by reference ¶¶ 721-756, of this complaint, detailing the AUC's relationship with the government and the AUC's role as a state actor in Colombia.

920. The AUC used torture against civilians to intimidate them from providing support to guerrillas. The AUC would often force its victims to disclose names of other potential guerrilla supporters. They took workers from the plantations and tortured them to the point that many would invent stories and names in the hope that the paramilitaries would let them go. Two union leaders reported that the paramilitaries would use tactics such as

tying the worker's hands and feet, using chainsaws or pliers to break them to pieces, and pulling out their nails. On information and belief, the torture of Plaintiffs and decedents was intended to accomplish this goal.

FOURTH CLAIM FOR RELIEF

(War Crimes)

921. The allegations set forth in the above paragraphs are re-alleged and incorporated by reference as if fully set forth herein.

922. The AUC's conduct alleged in this complaint constitutes violence to life and person, including extrajudicial killing, torture, mutilation, the taking of hostages, the carrying out of executions without previous judgment pronounced by a regularly constituted court, incidents of outrages upon human dignity, forced movement, pillage, and denial of medical treatment.

923. The AUC's acts violate the law of nations in that they were committed in the course of war crimes, because 1) an armed conflict was ongoing; 2) the AUC was a party to the conflict; 3) Plaintiffs, decedents, and countless other victims of the AUC's acts did not take active part in the hostilities; and 4) the acts were committed in the course of armed conflict. These acts are thus war crimes, regardless of whether the AUC acted under color of state authority.

924. The war crimes described herein constitute torts that give rise to federal jurisdiction under the Alien Tort Statute (28 U.S.C. § 1350), as well as violations of customary international law and the common law of the United States, the statutes and common law of New Jersey, Ohio, Florida, the District of Columbia, and the laws of Colombia. Leaders, organizers, instigators, and accomplices participating in the

formulation of these acts are responsible for all acts performed by any person in execution of such plan.

925. Defendants are liable to Plaintiffs in that they aided and abetted, directed, ordered, requested, paid, were reckless in dealing with, participated in a joint criminal enterprise with, confirmed, ratified, were the principals of, and/or conspired with the AUC in bringing about the war crimes committed against Plaintiffs.

926. The Colombian civil war is an "armed conflict not of an international character," as specified in Common Article 3 of the Geneva Conventions, which hold that in such cases, specific acts such as torture and "carrying out of executions without previous judgment pronounced by a regularly constituted court" constitute war crimes when committed against non-combatants.

927. There is no dispute that at all relevant times, and up until the present, Colombia has been devastated by a long-standing civil conflict. This has been widely documented and, to Plaintiffs' knowledge, has never been disputed in this or any other case. For example, the 1997 State Department Human Rights Report notes that the Colombian government's control of national territory "has been increasingly challenged by longstanding and widespread internal armed conflict and rampant violence ..."

928. During all times relevant to this complaint, the civil war in Colombia pitted the Colombian government - along with its paramilitary allies, including the AUC - against the FARC and other left-wing guerrilla insurgents.

929. The Colombian civil war has continued uninterrupted since at least 1946, and claimed the lives of over 300,000 people. Both Venezuela and Ecuador's presidents have

referred to the FARC as a belligerent force. The Colombian government has engaged in prisoner exchanges with the FARC in the past. It held extensive negotiations with the FARC during the 1998-2002 time period, with involvement of the United Nations, and ceded a large portion of its territory to FARC control, referred to as the "zona de despeje," or cleared zone. During that time, the FARC assumed the powers of government in the cleared zone, including judicial and police powers.

930. Once Colombia's various paramilitary groups consolidated in 1997 under the leadership of Carlos Castaño, the AUC became the most visible armed opposition to the FARC, which, by late 1996, had become Colombia's most prominent leftist rebel group. From that time until its demobilization, the AUC was a major combatant in Colombia's civil conflict with the FARC. In most of the rural areas where the FARC had its strongholds, the Colombian military ceded military operations to the AUC. By 2001, the conflict between the AUC and the FARC had become a notorious exchange of atrocities.

931. Plaintiffs further incorporate by reference ¶¶ 708-720, 728-729, 736-756 and 801-811 of this complaint, explaining how the AUC became party to the Colombian civil war as a tool of the Colombian government, and its campaign of violence against civilians and union members in furtherance of the war against the FARC.

932. Civilians are entitled to the protections of Common Article 3 of the Geneva Conventions if they are "[p]ersons taking no active part in the hostilities." On information and belief, none of the surviving Plaintiffs nor decedents were party to the armed conflict in Colombia, as they were not members of the FARC, the AUC, or, indeed, any armed group that participated in the conflict.

933. Decedents were not killed because they or anyone related to them had taken part in the hostilities in any way. Rather, they were victims of the campaign conducted against civilians by the AUC in an effort to discourage support of the FARC. The AUC systematically murdered thousands of them without regard to whether they were actual participants in the civil war, as a warning to any potential guerrilla supporters.

934. Decedents were not killed simply against the background of war; rather, the use of criminal violence and intimidation against civilians was part of the war strategy against the FARC agreed on by the AUC and the Colombian Government, in which Chiquita was intentionally complicit.

935. The AUC used extremely violent means to take back areas held by the FARC and used tactics of violence and terror to depopulate areas of innocent civilians merely because the AUC presumed that civilians in areas previously held by the FARC were sympathetic to the leftist guerrillas. This military tactic is documented by the U.S. Department of State.

936. While this strategy was developed in Urabá, the model of collaboration between government and paramilitary was so successful that it was exported to the rest of the country and became part of the national war strategy.

937. Decedents were either members of particular social groups that were particularly targeted by the AUC as part of its war strategy, or thought to be connected to those groups in some way. Plaintiffs incorporate by reference ¶¶ 708-720, 728-729, 736-756, and 801-811, supra.

938. In fact, all of Plaintiffs' decedents were executed by the AUC as it used tactics of terror and violence, particularly in the areas that the FARC had a stronghold. They were

not merely incidental victims during a time of war; rather they were victims of the AUC's war strategies and goals.

FIFTH CLAIM FOR RELIEF

(Terrorism)

939. The allegations set forth in the above paragraphs are re-alleged and incorporated by reference as if fully set forth herein.

940. The acts of terrorism described herein constitute torts that give rise to federal jurisdiction under the Alien Tort Statute (28 U.S.C. § 1350), as well as violations of customary international law and the common law of the United States, the statutes and common law of New Jersey, Ohio, Florida, the District of Columbia, and the laws of Colombia.

941. Defendants are liable to Plaintiffs in that they aided and abetted, directed, ordered, requested, paid, were reckless in dealing with, participated in a joint criminal enterprise with, confirmed, ratified, were the principals of, and/or conspired with the AUC in bringing about the acts of terrorism committed against Plaintiffs.

942. Plaintiffs' decedents, as well as the vast majority of AUC targets in Urabá, were civilians.

943. The AUC targeted not only guerrilla sympathizers but anyone suspected of supporting their leftist ideology, such as teachers, community leaders, trade unionists, human rights defenders, religious workers, and leftist politicians. The AUC targeted civilians in towns near known guerrilla groups because they claimed guerrilla groups could only operate in the region with the logistical support of local towns.

944. Plaintiffs incorporate by reference ¶¶ 708-720, 728-729, 736-756 and 801-811, supra, detailing why Plaintiffs' decedents were characterized as FARC sympathizers and the threats they posed to the AUC and banana growers. Killing plaintiffs' decedents was part of the general strategy of the AUC. Through these murders, the AUC intended to deter others from expressing views that could be construed as supporting the FARC or their ideology.

SIXTH CLAIM FOR RELIEF

(Material Support to Terrorist Organizations)

945. The allegations set forth in the above paragraphs are re-alleged and incorporated by reference as if fully set forth herein.

946. Defendants' conduct alleged herein constitutes a violation of the international law prohibition against providing material support to terrorist organizations, in that Defendants provided assets to a terrorist organization with the knowledge or intent that they would be used to carry out attacks on civilians for the purpose of intimidating or coercing a civilian population. Defendants' conduct constitutes material support to terrorist organizations, regardless of whether Defendants acted under color of state authority.

947. The acts of providing assistance to the AUC described herein constitute material support to a terrorist organization in violation of the Alien Tort Statute (28 U.S.C. § 1350), customary international law, the statutes and common law of the United States, the statutes and common laws of New Jersey, Ohio, Florida, the District of Columbia, the laws of Colombia, and the international treaties, agreements, conventions and resolutions described in the paragraphs above. Leaders, organizers, instigators, and accomplices

participating in the formulation of these acts are responsible for all acts performed by any person in execution of such plan

948. Defendants are liable to Plaintiffs in that they directly participated in the provision of material support to the AUC, and/or they aided and abetted, directed, ordered, requested, paid, were reckless in dealing with, participated in a joint criminal enterprise with, confirmed, ratified, were the principals of, and/or conspired with others, including members of the AUC, to provide material support to the AUC, whose terrorist actions caused Plaintiffs' injuries.

949. As detailed above, Defendants provided a variety of forms of material support to the AUC, including cash and assistance in trafficking weapons and drugs.

950. The support that Chiquita provided was crucial to the AUC's success against the FARC in the area and ability to continue killing civilians. Payments from Chiquita and other banana companies constituted a significant portion of the AUC's budget in some areas.

951. At all times relevant to this Complaint, the AUC has been an organization engaged in acts of premeditated, politically-motivated violence against noncombatant targets. The AUC's terrorist activities have been well-known at all relevant times, and, on information and belief, Defendants were aware of such activities. From September 10, 2001, until the present, the AUC has been designated by the United States government as a Foreign Terrorist Organization.

952. As detailed above, Chiquita knew of and intentionally supported the AUC's strategy of targeting civilians in order to intimidate the population of Urabá from supporting the FARC. Chiquita provided this support in exchange for security and

stability on the banana plantations, which it achieved through the murder or disappearance of civilians such as union leaders, community activists, and suspected criminals.

SEVENTH CLAIM FOR RELIEF

(Cruel, Inhuman, or Degrading Treatment)

953. The allegations set forth in the above paragraphs are re-alleged and incorporated by reference as if fully set forth herein.

954. The conduct alleged herein constitute cruel, inhuman, or degrading treatment in violation of the Alien Tort Statute (28 U.S.C. § 1350), customary international law, the common law of the United States, the statutes and common law of New Jersey, Florida, Ohio, the District of Columbia, the laws of Colombia, and the international treaties, agreements, conventions and resolutions described in the paragraphs above.

955. The AUC committed acts of cruel, inhuman, or degrading treatment in that they inflicted mental or physical suffering, anguish, humiliation, fear and debasement upon Plaintiffs and their decedents. The acts described herein had the intent and the effect of grossly humiliating and debasing the Plaintiffs, forcing them to act against their will and conscience, inciting fear and anguish, and/or breaking their physical or moral resistance. Plaintiffs were placed in great fear for their lives and were forced to suffer severe physical and psychological abuse and agony.

956. Defendants are liable to Plaintiffs in that they aided and abetted, directed, ordered, requested, paid, were reckless in dealing with, participated in a joint criminal enterprise with, confirmed, ratified, were the principals of, and/or conspired with the AUC, which

was acting under color of law by collaboration with the Colombian military, to bring about the cruel, inhuman, and degrading treatment committed against Plaintiffs.

957. The AUC inflicted mental and physical suffering, anguish, humiliation, fear and debasement on Plaintiffs and their decedents as part of the role assigned to them by the Colombian State, to intimidate and coerce them from supporting the FARC

958. Plaintiffs incorporate by reference ¶¶ 721-756 of this complaint, detailing the AUC's relationship with the government and the AUC's role as a state actor in Colombia.

EIGHTH CLAIM FOR RELIEF

(Violation of the Rights to Life, Liberty and Security
of Person and Peaceful Assembly and Association)

959. The allegations set forth in the above paragraphs are re-alleged and incorporated by reference as if fully set forth herein.

960. The conduct alleged herein constitute violation of the rights to life, liberty and security of person and peaceful assembly and association in violation of the Alien Tort Statute (28 U.S.C. § 1350), customary international law, the common law of the United States, the statutes and common law of New Jersey, Florida, Ohio, the District of Columbia, the laws of Colombia, and the international treaties, agreements, conventions and resolutions described in the paragraphs above.

961. The AUC violated Plaintiffs' and their decedents' rights to life, liberty and security of person and peaceful assembly and association in that they carried out 1) a systematic campaign of terror and violence 2) conceived and arbitrarily waged by state agents 3) hatched and calculated to suppress political opinion and expression.

962. Defendants are liable to Plaintiffs in that they aided and abetted, directed, ordered,

requested, paid, were reckless in dealing with, participated in a joint criminal enterprise with, confirmed, ratified, were the principals of, and/or conspired with the AUC, which was acting under color of law by collaboration with the Colombian military, to bring about the cruel, inhuman, and degrading treatment committed against Plaintiffs.

963. Plaintiffs incorporate by reference of this complaint, detailing the relationship between the AUC and the government and the AUC's role as a state actor in Colombia.

964. Based on paragraphs ¶¶ 708-720, 728-729, 736-756 and 801-811, supra, which are incorporated herein by reference, the AUC carried out the role assigned it by the Colombian government by waging a systemic campaign of terror and violence against civilians in the name of defeating the guerrillas.

965. Decedents were killed in the course of the AUC's campaign against the FARC.

966. One of the overriding purposes of the AUC's campaign of terror against civilians, including Plaintiffs and decedents, was to intimidate and coerce civilians in Urabá against supporting the FARC or, indeed, any political ideology that could be associated with the FARC. This could and often did include the violent suppression of any form of political or social organization activity outside of those forms specifically endorsed by the paramilitaries and the government. Plaintiffs incorporate by reference ¶¶ 708-720, 728-729, 736-756, 801-811, supra.

967. Decedents were killed to suppress their political expression and to prevent them and others from giving political support to the leftist ideologies associated with the FARC.

NINTH CLAIM FOR RELIEF

(Consistent Pattern of Gross Violations of

Internationally Recognized Human Rights)

968. The allegations set forth in the above paragraphs are re-alleged and incorporated by reference as if fully set forth herein.

969. The conduct alleged herein constitute a consistent pattern of gross violations of internationally recognized human rights in violation of the Alien Tort Statute (28 U.S.C. § 1350), customary international law, the common law of the United States, the statutes and common law of New Jersey, Florida, Ohio, the District of Columbia, the laws of Colombia, and the international treaties, agreements, conventions and resolutions described in the paragraphs above.

970. The AUC carried out a consistent pattern of gross violations of internationally recognized human rights against Plaintiffs, their decedents, and others in that the abovedescribed abuses against Plaintiffs and decedent occurred within the context of numerous similar abuses and killings.

971. Defendants are liable to Plaintiffs in that they aided and abetted, directed, ordered, requested, paid, were reckless in dealing with, participated in a joint criminal enterprise with, confirmed, ratified, were the principals of, and/or conspired with the AUC, which was acting under color of law by collaboration with the Colombian military, to bring about the cruel, inhuman, and degrading treatment committed against Plaintiffs.

972. The torture, murder, and other abuses committed against decedents, surviving Plaintiffs, and their family members was committed as part of and in the context of a consistent pattern of abuses that constitute gross violations of internationally recognized human rights. These abuses include violations of the right to life, right to security of

person, right to security of property, right to privacy, right to freedom of political expression and social organization, and many others.

973. The specific acts constituting these violations include thousands of murders and incidents of torture and cruel, inhuman and degrading treatment, forced displacement, unwarranted intrusions into the private medical information and decisions of banana workers, suppression of union activity and peaceful political dissidence.

TENTH CLAIM FOR RELIEF

(Wrongful Death)

974. The allegations set forth in the above paragraphs are re-alleged and incorporated by reference as if fully set forth herein.

975. As a direct result of Defendants' acts and omissions and as a result of the deaths described above, Plaintiffs have sustained pecuniary loss resulting from the loss of society, comfort, attention, services, and support of the decedents.

976. Defendants are liable to Plaintiffs in that they aided and abetted, directed, ordered, requested, paid, were reckless in dealing with, participated in a joint criminal enterprise with, confirmed, ratified, were the principals of, and/or conspired with the AUC in bringing about the wrongful deaths of the decedents.

977. The acts described herein constitute wrongful death, actionable under the laws of the United States, Colombia or the common law of the District of Columbia, Ohio, New Jersey, Florida or any other applicable jurisdiction.

ELEVENTH CLAIM FOR RELIEF

(Assault and Battery)

978. Defendants' actions alleged herein constitute assault and battery in that they acted with the intention of causing offensive and harmful touching of Plaintiffs' persons without the consent of Plaintiffs, and/or they acted with the intention of creating the imminent apprehension that such touching would result, and such touching or apprehension of touching resulted.

979. As a result of these acts, Plaintiffs were placed in great fear for their lives and suffered severe physical and psychological abuse and agony.

980. Defendants' acts were willful, intentional, wanton, malicious, and oppressive.

981. Defendants are liable to Plaintiffs in that they aided and abetted, directed, ordered, requested, paid, were reckless in dealing with, participated in a joint criminal enterprise with, confirmed, ratified, were the principals of, and/or conspired with the AUC in bringing about the assault and battery of Plaintiffs and decedents.

982. The AUC abducted and killed decedents, in some cases in front of Plaintiffs and their family members. In so doing, the AUC intended to cause decedents to suffer dangerous, harmful, and offensive physical contact without their consent, and also to frighten them with the imminent apprehension of such contact, and they also intended to frighten surviving Plaintiffs with the imminent apprehension of such contact.

983. The AUC's acts of kidnapping, killing, and torture alleged herein included harmful physical contact that caused injury and death to decedents without their consent, and acts of physical and emotional intimidation that caused decedents and surviving Plaintiffs to suffer the fright and apprehension of immediate harmful physical contact.

984. The acts described herein constitute assault and battery, actionable under the laws

of the United States, Colombia or the common law of Ohio, New Jersey, Florida or any other applicable jurisdiction.

TWELFTH CLAIM FOR RELIEF

(Intentional Infliction of Emotional Distress)

985. The allegations set forth in the above paragraphs are re-alleged and incorporated by reference as if fully set forth herein.

986. Defendants' outrageous conduct constitutes the intentional infliction of emotional distress and is actionable under the laws of the United States, Colombia or the common law of Ohio, New Jersey, Florida, the District of Columbia or any other applicable jurisdiction.

987. Defendants' conduct alleged herein constitutes intentional infliction of emotional distress in that it was intentional and/or reckless, was extreme and outrageous, and caused severe distress to Plaintiffs and decedents.

988. As a direct and proximate result of Defendants' acts, Plaintiffs were placed in great fear for their lives and were forced to suffer severe physical and psychological abuse and agony.

989. Defendants are liable to Plaintiffs in that they aided and abetted, directed, ordered, requested, paid, were reckless in dealing with, participated in a joint criminal enterprise with, confirmed, ratified, were the principals of, and/or conspired with the AUC in bringing about the intentional infliction of emotional distress of Plaintiffs and decedents.

990. By continuing to provide financial support, arms, and assistance in smuggling drugs, as well as directing, colluding with, and jointly planning with the AUC to carry out the Colombian government's violent paramilitary campaign against civilians, Defendants

intentionally acted, with the intent and/or deliberate disregard of the high possibility that their conduct would lead to the abduction, torture, and killing of decedents, causing severe humiliation, mental anguish, and emotional distress to decedents, surviving Plaintiffs, and their families.

991. At all relevant times, it was in Defendants' power to cease their assistance, support, direction, collusion, and joint planning with the AUC or to prevent or prohibit such conduct, but instead they continued in their course of conduct continuously from 1995 until at least 2007.

992. Defendants' conduct alleged herein violated the laws of Colombia, Florida, New Jersey, Ohio, the District of Columbia, the United States, the law of nations, and any other applicable jurisdiction. War crimes, crimes against humanity, torture, extrajudicial killing, cruel, inhuman and degrading treatment, violations of the right to life, liberty, security of person, and peaceful assembly and expression, terrorism, material support of terrorism, and consistent patterns gross violations of internationally recognized human rights are acts that are so heinous that they are considered to be of universal and mutual concern to all nations of the world, such that nations have a legally binding obligation to punish and prevent them. Defendants' complicity in such acts is therefore so extreme and outrageous in character as to be completely unjustifiable and intolerable in a civilized community.

993. By continuing to provide financial support, arms, and assistance in smuggling drugs, as well as directing, colluding with, and jointly planning with AUC to carry out the Colombian government's violent paramilitary campaign against civilians, Defendants proximately caused the injuries alleged in this complaint. Their involvement in the AUC's

activities - including providing arms and money, and sending names to the paramilitaries to be included on execution lists - formed a crucial component in the AUC's ability and motivation to attack Plaintiffs, decedents, and countless other civilians in Urabá.

994. As a result of Defendants' actions and the killings and other abuses carried out by the AUC, decedents were severely frightened and traumatized before being killed. The AUC caused the Plaintiffs severe mental and physical pain in witnessing or learning of the murders of their family members. Individual Plaintiffs also experienced suffering in being threatened against pursuing an investigation of the death, being forced to flee the area, and feeling threatened and frightened that the AUC would also target them. These, fears, disturbances, and traumas constitute genuine and substantial distress, of a sort so severe that no person could reasonably be expected to withstand it.

995. Defendants' outrageous conduct constitutes the intentional infliction of emotional distress and is actionable under the laws of the United States, Colombia or the common law of Ohio, New Jersey, Florida, the District of Columbia or any other applicable jurisdiction.

THIRTEENTH CLAIM FOR RELIEF

(Negligent Infliction of Emotional Distress)

996. The allegations set forth in the above paragraphs are re-alleged and incorporated by reference as if fully set forth herein.

997. Defendants' conduct constitutes the negligent infliction of emotional distress and is actionable under the laws of the United States, Colombia or the common law of New Jersey, Florida, Ohio, the District of Columbia, or any other applicable jurisdiction.

998. Defendants' conduct constitutes negligent infliction of emotion distress in that Defendants owed Plaintiffs and decedents a duty to act with reasonable care, they breached that duty, emotional distress was reasonably foreseeable, Defendants' conduct proximately caused the distress, and the distress was genuine and substantial.

999. As a direct and legal result of Defendants' wrongful acts, Plaintiffs have suffered and will continue to suffer significant physical injury, pain and suffering, and extreme and severe mental anguish and emotional distress.

1000. Defendants are liable to Plaintiffs in that they aided and abetted, directed, ordered, requested, paid, were reckless in dealing with, participated in a joint criminal enterprise with, confirmed, ratified, were the principals of, and/or conspired with the AUC in bringing about the negligent infliction of emotional distress of Plaintiffs and decedents.

1001. Defendants breached their duty to Plaintiffs by failing to act so as to stop engaging the conduct described herein, and by failing to take steps in their power to prevent or prohibit such conduct

1002. By continuing to provide financial support, arms, and assistance in smuggling drugs, as well as directing, colluding with, and jointly planning with the AUC to carry out the Colombian government's violent paramilitary campaign against civilians, Defendants breached their duty to Plaintiffs to act with reasonable care so as not to cause injury to them.

1003. At all relevant times, it was in Defendants' power to cease their assistance, support, direction, collusion, and joint planning with the AUC or to prevent or prohibit such conduct, but instead they continued in their course of conduct continuously from no later than 1995 until at least 2004.

1004. By continuing to provide financial support, arms, and assistance in smuggling drugs, as well as directing, colluding with, and jointly planning with AUC to carry out the Colombian government's violent paramilitary campaign against civilians, Defendants proximately caused the injuries alleged in this complaint. Their involvement in the AUC's activities - including providing arms and money, and sending names to the paramilitaries to be included on execution lists - formed a crucial component in the AUC's ability and motivation to attack Plaintiffs, decedents, and countless other civilians in Urabá.

1005. From the moment of their first involvement with paramilitary groups, Defendants were aware that their assistance, collusion, direction, and support would result in the killing, torture, and other abuses committed against Plaintiffs, decedents, and countless other civilians in Urabá.

1006. As early as 1995, paramilitary groups like the ACCU were notorious for their brutal methods and tactic of declining to discriminate between combatants and civilians.

1007. The massacres committed by the nascent AUC beginning in 1997 were also well known and were the subject of any number of newspaper articles and investigations both in Colombia and abroad.

1008. Despite their general knowledge about the paramilitaries' tactics and specific understanding of the paramilitaries' activities in Urabá, Defendants specifically engaged, paid, directed, colluded, and otherwise supported them to suppress union activity and discourage support of the FARC - the very activities for which their brutal tactics were notorious. Defendants played this role with the knowledge and intent that the paramilitaries would committed the abuses alleged herein, and they continued to play this

role as it became clear that their support was being used to torture, murder, and otherwise harm innocent civilians.

1009. As a result of Defendants' actions and the killings and other abuses carried out by the AUC, decedents were severely frightened and traumatized before being killed. The AUC caused the Plaintiffs severe mental and physical pain in witnessing or learning of the murders of their family members. Individual Plaintiffs also experienced suffering in being threatened against pursuing an investigation of the death, being forced to flee the area, and feeling threatened and frightened that the AUC would also target them. These, fears, disturbances, and traumas constitute genuine and substantial distress, of a sort so severe that no person could reasonably be expected to withstand it.

FOURTEENTH CLAIM FOR RELIEF

(Negligence/Negligent Hiring/Negligence Per Se)

1010. The allegations set forth in the above paragraphs are re-alleged and incorporated by reference as if fully set forth herein.

1011. Defendants' conduct constitutes negligence and is actionable under the laws of the United States, Colombia or the common law of Ohio, New Jersey, Florida, the District of Columbia or any other applicable jurisdiction.

1012. Defendants' conduct constitutes negligence in that Defendants owed Plaintiffs and decedents a duty to act with reasonable care not to injure them, 2) they breached that duty, 3) it was reasonably foreseeable that Defendants' negligence would cause injury, damage, loss, or harm to Plaintiffs and their next of kin.

1013. Defendants' negligent actions include, but are not limited to, unreasonably disregarding the risk that persons in their employ would commit torts against Plaintiffs

and decedents, and violating statutes and other laws designed to protect Plaintiffs and decedents.

1014. As a result of these acts, Plaintiffs suffered harm including, but not limited to, death, physical injury, and severe emotional distress.

1015. Defendants breached their duty to Plaintiffs by failing to act so as to stop engaging the conduct described herein, and by failing to take steps in their power to prevent or prohibit such conduct. By continuing to provide financial support, arms, and assistance in smuggling drugs, as well as directing, colluding with, and jointly planning with AUC to carry out the Colombian government's violent paramilitary campaign against civilians, Defendants breached their duty to Plaintiffs to act with reasonable care so as not to cause injury to them.

1016. Defendant's conduct constitutes negligence per se, because the payments to the AUC violated numerous Federal statutes, including but not limited to 50 U.S.C. §1705(b) and 31 C.F.R. § 594.204 (engaging in transactions with a Specially Designated Global Terrorist); the Anti Terror Act, 18 U.S.C. 113B; the Anti-Terrorism and Effective Death Penalty Act, Pub. L. No. 104-132, 110 Stat. 1214 (1996); and the Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001 ("USA Patriot Act"), Pub. L. No. 107-56, 115 Stat. 272 (2001). The alleged conduct is the type of conduct these statutes were intended to prevent, and Decedents and Plaintiffs are the types of persons these statutes were intended to protect.

1017. At all relevant times, it was in Defendants' power to cease their assistance, support, direction, collusion, and joint planning with the AUC or to prevent or prohibit

such conduct, but instead the continued in their course of conduct continuously from no later than 1995 until at least 2004.

1018. Defendants conduct alleged here in proximately caused Plaintiffs and decedents to suffer physical and emotional harm, including death.

1019. By continuing to provide financial support, arms, and assistance in smuggling drugs, as well as directing, colluding with, and jointly planning with AUC to carry out the Colombian government's violent paramilitary campaign against civilians, Defendants proximately caused the injuries alleged in this complaint. Their involvement in the AUC's activities - including providing arms and money, formed a crucial component in the AUC's ability and motivation to attack Plaintiffs, decedents, and countless other civilians in Urabá.

1020. At all relevant times, Defendants knew that their conduct would and did proximately result in physical and emotional harm to Plaintiffs.

1021. From the moment of their first involvement with paramilitary groups, Defendants were aware that their assistance, collusion, direction, and support would and did result in the killing, torture, and other abuses committed against Plaintiffs, decedents, and countless other civilians in Urabá. Defendants continued in this course of conduct from no later than 1995 until at least 2004 with the knowledge and intention that the AUC carry out these crimes.

1022. At all relevant times, Defendants knew that the AUC was an organization dedicated to the use of terrorism and violence against civilians, and could have foreseen that this created a risk of harm to other persons

1023. Defendants concluded an agreement in late 1996 or early 1997 with the AUC - which was, on information and belief, a formalization of prior arrangements to provide financial support to the ACCU, the AUC's predecessor - under which the AUC would provide security, suppress union activity, and discourage FARC support in return for payment and other forms of support and cooperation.

1024. Defendants engaged the AUC to provide these services despite their prior knowledge that the paramilitaries in general - and Carlos Castaño's group in particular - used terrorism and violence against civilians as a strategy to carry out those goals. It was therefore foreseeable that the AUC's known tactics would create a risk of harm to others.

1025. The AUC's dedication to the use of terrorism and violence against civilians proximately caused Plaintiffs' and decedents' injuries

1026. It was the AUC's tactic of using terrorism and violence to intimidate civilians, suppress union activity, and discourage support of the FARC that proximately caused the deaths of decedents and the mental and physical injuries to Plaintiffs.

1027. Defendants' acts of material support to the AUC, along with its acts of assistance, support, direction, and collusion, violated laws designed to protect Plaintiffs and decedents, including the ATS, ATA, and TVPA, and Colombian law outlawing armed convivir activity.

1028. As a result of these acts, Plaintiffs suffered harm including, but not limited to, severe emotional distress. Defendants' conduct constitutes negligence and is actionable under the laws of the United States, Colombia or the common law of Ohio, New Jersey, Florida, the District of Columbia, or any other applicable jurisdiction.

FIFTEENTH CLAIM FOR RELIEF

(Loss of Consortium)

1029. The allegations set forth in the above paragraphs are re-alleged and incorporated by reference as if fully set forth herein.

1030. At all times prior to their deaths, the decedents noted above were faithful, loving, and dutiful spouses, parents, children, or other family members to the Plaintiffs.

1031. As a result of the acts of Defendants, those Plaintiffs who are the family members of the decedents have been deprived of the decedents' society, comfort, attention, services, and support, all to their damage, in an amount to be proved at trial. In addition, those Plaintiffs have suffered and incurred the expenses of funeral and burial for the decedents, in an amount to be proved at trial.

1032. Defendants are liable to Plaintiffs in that they aided and abetted, directed, ordered, requested, paid, were reckless in dealing with, participated in a joint criminal enterprise with, confirmed, ratified, were the principals of, and/or conspired with the AUC in causing Plaintiffs to suffer loss of consortium.

1033. Defendants' conduct constitutes loss of consortium and is actionable under the laws of the United States, Colombia or the common law of Ohio, New Jersey, Florida, the District of Columbia or any other applicable jurisdiction.

PRAYER FOR RELIEF

WHEREFORE, each and every Plaintiff prays for judgment against each Defendant in excess of \$75,000, as follows:

for compensatory damages, including general and special damages;

for punitive damages;
for injunctive and declaratory relief as this Court deems appropriate;
for costs of suit; and
such other relief as the Court deems just and proper.

Respectfully submitted this 17th day of March, 2011,

/s/

/s/ Paul Wolf, Esq.
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