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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

Jane Doe 8, et al.,

Plaintiffs,

v.

*Chiquita Brands International, Inc., a New Jersey
Corporation,*

Defendant.

) Cause No. 20-3244

) **COMPLAINT AND DEMAND FOR JURY**
) **TRIAL**

On information and belief, Plaintiffs, by their attorneys, allege as follows:

ADDRESSES

1. All Plaintiffs can be contacted through their counsel, EarthRights International, 1612 K Street NW #800, Washington, DC 20006. The street and postal addresses of the individual Plaintiffs cannot be made public due to the substantial risk of violent reprisals against them. The street and postal address of Defendant Chiquita Brands International, Inc. (CBI), is 1855 Griffin Road, DCOTA Bldg, Suite C-436, Fort Lauderdale, FL 33004; their local office in New Jersey is 820 Bear Tavern Road, Trenton, NJ 08628.

I. INTRODUCTION

2. 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 paramilitary organizations including the United Self-Defense Groups of Colombia (*Autodefensas Unidas de Colombia*, or AUC), from at least 1992 through 2004. In order to produce bananas in an environment free from labor opposition and social disturbances, Chiquita funded, armed, and otherwise supported these paramilitary groups. The deaths of Plaintiffs’ relatives were a direct, foreseeable, and intended result of Chiquita’s illegal and tortious support of terrorist organizations. Chiquita’s actions violated not only Colombian law and U.S. law, but also customary international law prohibiting crimes against humanity, extrajudicial killing, torture, war crimes, and other abuses.

II. JURISDICTION

3. The Court has jurisdiction over this case with respect to claims based upon laws of the State of New Jersey, any other applicable state, and/or the laws of Colombia.

III. PARTIES

4. The term “Plaintiffs” herein includes the named plaintiffs and the decedents on behalf of whom they bring this action.

5. Plaintiffs Jane Doe 213, Jane Doe 8, John Doe 211, John Doe 212, John Doe 213, John Doe 214, John Doe 215, Jane Doe 214, and Jane Doe 215 are residents and citizens of Colombia. They bring claims based on the death of their family member, John Doe 12, as well as their own injuries.

6. Plaintiffs Jane Doe 9, Jane Doe 217, Jane Doe 218, Jane Doe 219, and Jane Doe 220 are residents and citizens of Colombia. They bring claims based on the death of their family member, John Doe 13, as well as their own injuries. Jane Doe 217, Jane Doe 218, Jane Doe 219, and Jane Doe 220 additionally bring claims based on the death of their mother, Jane Doe 216.

7. Plaintiff Jane Doe 10 is a resident and citizen of Colombia. She brings claims based on the death of her sons, John Doe 14 and John Doe 15, as well as her own injuries.

8. Plaintiff Jane Doe 11 is a resident and citizen of Colombia. She brings claims based on the death of her sister, Jane Doe 12, as well as her own injuries.

9. Plaintiff Jane Doe 13 is a resident and citizen of Colombia. She brings claims based on the death of her partner, John Doe 16, as well as her own injuries.

10. Plaintiff Jane Doe 14 is a resident and citizen of Colombia. She brings claims based on the death of her partner, John Doe 17, as well as her own injuries.

11. Plaintiff Jane Doe 16 is a resident and citizen of Colombia. She brings claims based on the death of her partner, John Doe 19, as well as her own injuries.

12. Plaintiff Jane Doe 17 is a resident and citizen of Colombia. She brings claims based on the death of her son, John Doe 20, as well as her own injuries.

13. Plaintiff Jane Doe 18 is a resident and citizen of Colombia. She brings claims based on the death of her husband, John Doe 21, as well as her own injuries.

14. Plaintiff Jane Doe 19 is a resident and citizen of Colombia. She brings claims based on the death of her son, John Doe 22, as well as her own injuries.

15. Plaintiff Jane Doe 221 is a resident and citizen of Colombia. She brings claims based on the death of her son, John Doe 24, as well as her own injuries.

16. Plaintiff Jane Doe 20 is a resident and citizen of Colombia. She brings claims based on the death of her partner, John Doe 25, as well as her own injuries.

17. Plaintiff Jane Doe 21 is a resident and citizen of Colombia. She brings claims based on the deaths of her mother, Jane Doe 22, and her stepfather, John Doe 26, as well as her own injuries.

18. Plaintiff Jane Doe 23 is a resident and citizen of Colombia. She brings claims based on the death of her son, John Doe 27, and her husband, John Doe 28, as well as her own injuries.

19. Plaintiff Jane Doe 24 is a resident and citizen of Colombia. She brings claims based on the death of her partner, John Doe 29, as well as her own injuries.

20. Plaintiff Jane Doe 25 is a resident and citizen of Colombia. She brings claims based on the death of her partner, John Doe 30, as well as her own injuries.

21. Plaintiff Jane Doe 26 is a resident and citizen of Colombia. She brings claims based on her own injuries.

22. Plaintiff Jane Doe 27 is a resident and citizen of Colombia. She brings claims based on the death of her father, John Doe 105, as well as her own injuries.

23. Plaintiff Jane Doe 30 is a resident and citizen of Colombia. She brings claims based on the death of her mother, Jane Doe 31, as well as her own injuries.

24. Plaintiff Jane Doe 99 is a resident and citizen of Colombia. She brings claims based on the death of her mother, Jane Doe 100, as well as her own injuries.

25. Plaintiff Jane Doe 121 is a resident and citizen of Colombia. She brings claims based on her own injuries.

26. Plaintiff Jane Doe 122 is a resident and citizen of Colombia. She brings claims based on her own injuries.

27. Plaintiff John Doe 23 is a resident and citizen of Colombia. He brings claims based on his own injuries.

28. Plaintiff John Doe 32 is a resident and citizen of Colombia. He brings claims based on his own injuries.

29. Plaintiff John Doe 33 is a resident and citizen of Colombia. He brings claims based on his own injuries.

30. Plaintiff Jane Doe 28 is a resident and citizen of Colombia. She brings claims based on the death of her brother, John Doe 34, and her partner, John Doe 150, as well as her own injuries.

31. Plaintiff John Doe 35 is a resident and citizen of Colombia. He brings claims based on his own injuries.

32. Plaintiff John Doe 37 is a resident and citizen of Colombia. He brings claims based on his own injuries.

33. Plaintiff John Doe 39 is a resident and citizen of Colombia. He brings claims based on his own injuries.

34. Plaintiff John Doe 40 is a resident and citizen of Colombia. He brings claims based on his own injuries.

35. Plaintiff Jane Doe 32 is a resident and citizen of Colombia. She brings claims based on her own injuries.

36. Plaintiffs Jane Doe 33, Jane Doe 34, John Doe 48, John Doe 49, and John Doe 50 are residents and citizens of Colombia. They bring claims based on the death of their family member, John Doe 47, as well as their own injuries.

37. Plaintiff Jane Doe 35 is a resident and citizen of Colombia. She brings claims based on the death of her partner, John Doe 51, as well as her own injuries.

38. Plaintiff Jane Doe 36, Jane Doe 224, Jane Doe 225, Jane Doe 226, and John Doe 216 are residents and citizens of Colombia. They bring claims based on the death of their family member, John Doe 52, as well as their own injuries.

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