



Appendix

Plaintiffs in *Doe v. Chiquita* have sued the following former Chiquita executives for their role in supporting the paramilitary terrorist organization, Autodefensas Unidas de Colombia (AUC). The descriptions below are taken from the allegations made in the plaintiffs' complaint. According to the complaint, which is derived largely from U.S. government and internal Chiquita documents, each of these individuals actively participated in Chiquita's scheme to pay the AUC and each knew that the AUC was a violent paramilitary organization when they acted.

1. **Cyrus Freidheim** is the former CEO and Chairman of Chiquita. When he joined Chiquita in 2002, he learned that Chiquita was making payments to the AUC, but authorized the continuation of those payments in spite of his knowledge that they were a violent paramilitary organization. He authorized their continuation even after he learned that they were a designated terrorist organization.
2. **Roderick Hills**, who passed away in December 2014, is the former head of the Audit Committee of Chiquita's Board of Directors. The Audit Committee was responsible for overseeing Chiquita's payments in Colombia; they received regular reports about Chiquita's illicit payments to the AUC and authorized those payments. Hills personally met with the Department of Justice in 2003 who told him that the payments were unlawful. He continued to approve the payments even after this admonition. His estate is now a defendant.
3. **Robert Kistingner** is the former President and Chief Operating Officer of Chiquita Fresh Group. Kistingner knew of and authorized Chiquita's payments to the AUC, even though he knew that the AUC was a violent paramilitary organization and that it was ultimately designated by the United States as a terrorist organization.
4. **Robert Olson** is the former General Counsel for Chiquita. Olson knew of and approved payments to the AUC, through front groups known as *convivirs*. Olson continued to approve payments to the AUC even when he was told by outside counsel that they were unlawful, even after he learned that the AUC was a designated terrorist organization, and even after he knew that the Department of Justice had instructed Chiquita to stop making the payments.
5. **William Tsacalis** is the former Chief Accounting Officer for Chiquita. Tsacalis knew about Chiquita's payments to the AUC and designed an accounting procedure that disguised the fact that they were going to the AUC.
6. **Charles Keiser** is the former general manager of Chiquita's Colombia subsidiary, Banadex. Keiser was the Chiquita executive that first met with the AUC in the late 1990s and made the agreement through which Chiquita financed the AUC. He personally approved payments to the AUC.