

**CORPORATE RESTITUTION FOR SLAVERY:  
PLAINTIFF AND DEFENDANT INFORMATION**

*Compilation by Deadria C. Farmer-Paellmann*

## **CORPORATE RESTITUTION FOR SLAVERY: PLAINTIFF AND DEFENDANT INFORMATION**

*This compilation comprises materials on landmark class action lawsuits brought on behalf of 35 million descendants of enslaved Africans for slavery reparations. The actions were filed by plaintiffs in six different states (New York, New Jersey, Illinois, California, Louisiana, and Texas) against a total of seventeen defendant corporations that allegedly profited from slavery and the transatlantic slave trade. The cases have been consolidated in the U.S. District Court, Northern District of Illinois, Eastern Division, before Judge Charles R. Norgle.*

### **DEFENDANT CORPORATIONS BY INDUSTRY**

#### **INSURANCE**

AETNA  
LLOYD'S OF LONDON  
NEW YORK LIFE

#### **FINANCE**

FLEETBOSTON  
AFSA DATA CORP  
BROWN BROTHERS HARRIMAN  
JP MORGAN CHASE  
LEHMAN BROTHERS

#### **TOBACCO**

RJ REYNOLDS  
BROWN & WILLIAMSON  
LIGGET GROUP INC.  
LOEWS CORP

#### **RAILROAD**

CANADIAN NATIONAL  
CSX  
NORFOLK SOUTHERN  
UNION PACIFIC

#### **TEXTILE**

WESTPOINT STEVENS

## PLAINTIFF/DEFENDANT CHART

PLAINTIFFS	DEFENDANTS	STATE FILE DATE	MDL-1491 CASE No
Deadria Farmer-Paellmann	FleetBoston Financial Corporation Aetna Inc. CSX	New York 3/26/02	02-C-7766
Andre' Carrington	FleetBoston Financial Corporation Aetna Inc. CSX	New York 3/26/02	02-C-7767
Mary Lacey Madison	FleetBoston Financial Corporation Aetna Inc. CSX	New York 3/26/02	02-C-7768
Richard Barber	Brown Brothers Harriman New York Life Insurance Company Norfolk Southern	New Jersey 5/1/02	02-C-7765
Marcelle Porter Hannah Jane Hurdle-Toomey	Lloyd's of London Lehman Brothers Union Pacific	Illinois 8/29/02	02-C-6180
Eddlee Bankhead c/o John Bankhead	Lloyd's of London Lehman Brothers Norfolk Southern Westpoint Stevens R.J. Reynolds Tobacco Company Brown and Williamson Liggett Group, Inc. Loews Corporation	New York 9/3/02	02-C-9181
Timothy Hurdle Chester Hurdle	FleetBoston Financial Corporation Aetna Inc. Lloyd's of London New York Life Insurance Company Westpoint Stevens R.J. Reynolds Tobacco Company Brown and Williamson Liggett Group, Inc. Loews Corporation Canadian National AFSA Data Corp	California <i>State Court</i>  9/10/02	Pending
Raymond Johnson Antoinette Harrell-Miller, et al.	Aetna Inc. Lloyd's of London Brown Brothers Harriman R.J. Reynolds Tobacco Company Brown and Williamson Liggett Group, Inc. Loews Corporation CSX Corp Norfolk Southern Union Pacific Canadian National	Louisiana 9/3/02	02-C-9180
Julie Mae Wyatt-Kervin Ina Daniels Hurdle-McGee	J.P. Morgan Chase Westpoint Stevens Union Pacific	Texas 1/21/03	Pending

# **DEFENDANT CORPORATIONS**

## **INSURANCE INDUSTRY**

### **AETNA**

AETNA INC. (“AETNA”) is a corporation with its principal place of business located at 151 Farmington Avenue, Hartford, Connecticut 06156. Upon information and belief, AETNA’s predecessor in interest, actually insured slave owners against the loss of their human chattel. AETNA knew the horrors of slave life as is evident in a rider through which the company declined to pay the premiums for slaves who were lynched or worked to death or who committed suicide. Additionally, AETNA insured enslaved Africans who worked in the agricultural industry of which Plaintiff’s enslaved. AETNA, therefore, unjustly profited from the institution of slavery.

### **LLOYD'S OF LONDON**

LLOYD’S OF LONDON is an underwriting company with its principal places of business located at 1 Lime Street, London EC3M 7HA and at 590 5<sup>th</sup> Avenue, 17<sup>th</sup> Floor, New York, New York 10036. It was involved in insuring ships utilized for the Trans-Atlantic slave trade. The writing of such policies was an unfair business practice designed to help finance the international slave trade, to provide states with human chattel that were subjected to the immoral practices of slavery as set forth by the cruel and inhumane Slave Codes created and enforced by states.

Furthermore, upon information and belief LLOYD’S OF LONDON, failed to comply with California Slavery Era Policy Law, *Insurance Code* sections 13810 *et seq.* and its reporting requirement.

### **NEW YORK LIFE**

NEW YORK LIFE INSURANCE COMPANY (“NEW YORK LIFE”) is a corporation with its general office located at 2 New York Plaza, 7<sup>th</sup> Floor, New York, New York 10004. NEW YORK LIFE’s predecessor-in-interest, Nautilus Insurance, earned premiums from its sale of life insurance to slave owners. It insured slaves in the agricultural industry.

# FINANCE INDUSTRY

## FLEETBOSTON

FLEETBOSTON is a Delaware corporation with its principal place of business located at 100 Federal Street, Boston, Massachusetts 02110. FLEETBOSTON is a successor in interest to the Providence Bank of Rhode Island that was founded by Rhode Island businessman John Brown. Brown owned ships that embarked on several transatlantic slave trading voyages when such trading was illegal according to Rhode Island Law. Brown was prosecuted in federal court for participating in such trading in violation of a 1794 federal law that prohibited certain types of slave trading.<sup>1</sup> Upon information and belief, the Providence Bank of Rhode Island lent substantial sums of money to Brown, thus financing and profiting from the founder's illegal slave trading.

Upon information and belief, FLEETBOSTON, through its predecessor bank, also collected custom duties and fees due on ships transporting enslaved Africans in violation of Rhode Island and federal law, thus profiting from the illegal slave trade

Upon information and belief, over 41,369 Africans were enslaved during the time that FLEETBOSTON, through its predecessor bank, collected custom duties and fees on ships engaged in the illegal slave trade.<sup>2</sup> Providing loans to slave traders to engage in illegal slave trading, and the regular collection of duties and fees, earned in the illegal enslavement of Africans constituted aiding and abetting in the illegal slave trade.

## AFSA DATA CORP

AFSA DATA CORPORATION (AFSA) is a Delaware corporation with its principal place of business located at 1 World Trade Center, Suite 2200, Long Beach, California. AFSA is the education service unit of defendant FLEETBOSTON FINANCIAL CORPORATION. Upon information and belief, AFSA has benefited directly from the fraudulent activities of FLEETBOSTON related to slavery through, and among other things, its management of about 8.1 million student loans taken out by members of the general public worth approximately \$85 billion. In addition, AFSA may have benefited from FLEETBOSTON'S historical unlawful business acts.

## BROWN BROTHERS HARRIMAN

BROWN BROTHERS HARRIMAN & COMPANY is a corporation with its principal place of business located at 59 Wall Street, New York, New York. It is the successor corporation to Brown Brothers & Co. The bank founders, James and William Brown, built their merchant bank by lending to Southern planters, brokering slave-grown

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<sup>1</sup> The laws violated include Rhode Island's *1787 Act to prevent the Slave-Trade and Encourage the Abolition of Slavery*, and the Federal government's *1794 Act to Prohibit the Carrying on of the Slave Trade from the United States to Any Foreign Place of Country*.

<sup>2</sup> Jay Coughtry, *The Notorious Triangle: Rhode Island and the African Slave Trade 1700 to 1807*, at 267-285.

cotton and acting as a clearinghouse for the South's complex financial system. The firm earned commissions arranging cotton shipments from Southern ports to mills in New England and Britain. It also loaned millions directly to planters, merchants and cotton brokers throughout the South. Company records also reveal that Brown Brothers owed to plantation owners who told the firm that they needed the cash to buy slaves. When those planters or their banks failed, it used its local agents to run repossessed plantations and manage the enslaved Africans working there.

### **JP MORGAN CHASE**

JP MORGAN CHASE is a corporation with its principal place of business at 270 Park Avenue, New York, New York 10017. Two of its predecessor banks that merged to become JP Morgan Chase were behind a consortium to raise money to insure slavery.

### **LEHMAN BROTHERS**

LEHMAN BROTHERS is a corporation with its principal business at c/o King and Spalding, 1185 Avenue of the Americas, 30<sup>th</sup> Floor, New York, NY 10036. LEHMAN BROTHERS founder Henry Lehman began as a peddler in 1844, but shortly thereafter when his two brothers, Mayer and Emanuel joined him, they soon grew rich as middlemen in the slave-grown cotton trade. After Henry Lehman's death in 1856 and after the war, the remaining two brothers moved north and continued trading in cotton, oil, sugar and coffee, and then took a seat on the New York Stock Exchange in 1887.

# TOBACCO INDUSTRY

## RJ REYNOLDS TOBACCO COMPANY

R.J. REYNOLDS TOBACCO COMPANY is a corporation with its principal place of business located at 401 North Main Street, Winston-Salem, North Carolina 27102. R.J. REYNOLDS TOBACCO COMPANY is the beneficiary of assets acquired through the forced uncompensated labors of enslaved African Americans. Hardin Reynolds, father of R.J. Reynolds owned and operated a tobacco factory at the plantation called “Rock Spring Plantation” – the present day Reynolds Homestead in Critz, Virginia.<sup>3</sup>

Just before the Civil war, Hardin Reynolds owned at least 88 slaves who provided labor on the plantation, including in the Rock Spring tobacco factory.<sup>4</sup> Operating information on the Rock Spring factory shows that slave labor was used to produce tobacco and other goods for the tobacco factory.<sup>5</sup> Hardin Reynolds continued operation of his tobacco factory during and after the Civil war, and was not broken by the war.<sup>6</sup> Amongst other enterprises, he often engaged in business partnerships with his children.<sup>7</sup>

Hardin Reynolds’ son, Richard Joshua Reynolds, founder of R. J. Reynolds Tobacco Company, worked at the Rock Spring tobacco factory<sup>8</sup> after the Civil War, and later formed a business partnership with his father at the factory. The partnership was called “Hardin Reynolds and Son.”<sup>9</sup> In the fall of 1874, R.J. Reynolds sold his interest in the Rock Spring Factory<sup>10</sup> and purchased land in North Carolina in October 1874 upon which he built an R.J. Reynolds Tobacco Company factory.<sup>11</sup> Records indicate that R. J. took half of two year’s profit from the Rock Spring factory to found his new company R.J. Reynolds Tobacco Company.<sup>12</sup>

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<sup>3</sup> Nannie M. Tilley, *The RJ Reynolds Tobacco Company*, at 8.

<sup>4</sup> *Id.* at 9.

<sup>5</sup> *Id.* at 13.

<sup>6</sup> *Id.* at 27. Hardin Reynolds was able to raise money to pay taxes in the late 1860s and the 1870s, an indication that he was relatively well off even after the Civil War. *The Reynolds Homestead* by Nannie M. Tilley, 17-18.

<sup>7</sup> *The RJ Reynolds Tobacco Company* at 14.

<sup>8</sup> *Id.* at 21.

<sup>9</sup> *Id.* at 24.

<sup>10</sup> *Id.* at 26.

<sup>11</sup> *Id.* at 31.

<sup>12</sup> *Id.* at 48.

On April 4, 1899, R. J. Reynolds Tobacco company became a subsidiary of the American Tobacco Company<sup>13</sup> through its relationship with the Continental Tobacco Company,<sup>14</sup> a holding company of the American Tobacco Company.<sup>15</sup> The American Tobacco Company owned controlling shares of stock in R.J. Reynolds Tobacco Company thereby benefiting from and aiding in its already profitable operations.<sup>16</sup> This relationship existed until 1911, when the U.S. Supreme Court issued a ruling that broke the old American Tobacco Company into several large competing companies.<sup>17</sup>

Currently existing companies, once part of the American Tobacco Company, and therefore beneficiaries of the slave labor include: R. J. Reynolds Tobacco Company, Brown & Williamson (formerly The American Tobacco Company via ownership of its predecessor by R.J. Reynolds Tobacco Company),<sup>18</sup> Liggett Group Inc. (formerly Liggett & Myers Tobacco Company), and Lorillard Tobacco Company a subsidiary of Loews Corporation.<sup>19</sup>

### **BROWN & WILLIAMSON**

BROWN AND WILLIAMSON TOBACCO CORP. (“BROWN & WILLIAMSON”) is a corporation with its principal place of business located at 200 Brown & Williamson Tower, Louisville, Kentucky 40202. BROWN AND WILLIAMSON is a successor in interest to The American Tobacco Company. BROWN AND WILLIAMSON benefited from slave labor because it was formed out of the American Tobacco Company that benefited from assets acquired by R. J. Reynolds Tobacco Company from the uncompensated labor of enslaved Africans.

### **LIGGETT GROUP INC.**

LIGGETT GROUP INC. is a corporation with its principal place of business located at 100 Maple Lane, Mebane, North Carolina. LIGGETT GROUP INC. is a successor in interest to the American Tobacco Company. LIGGETT GROUP INC. benefited from slave labor because it was formed out of the American Tobacco Company that benefited from assets acquired by R. J. Reynolds Tobacco Company from the uncompensated labor of enslaved Africans. Such use of enslaved Africans was an unfair business practice set forth by Slave Codes created and enforced by states.

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<sup>13</sup> This “Tobacco Combination” or trust formed by James Buchanan Duke was wholly owned by Continental Tobacco Company.

<sup>14</sup> Id. at 104

<sup>15</sup> Id. at 95

<sup>16</sup> Id. at 101

<sup>17</sup> [http://www.bw.com/Index\\_sub2.cfm?ID=10](http://www.bw.com/Index_sub2.cfm?ID=10)

<sup>18</sup> Nanny M. Tilley. The RJ Reynolds Tobacco Company, at 546.

<sup>19</sup> [http://www.bw.com/Index\\_sub2.cfm?ID=10](http://www.bw.com/Index_sub2.cfm?ID=10)

**LOEWS CORPORATION**

LOEWS CORPORATION is the parent corporation of Lorillard Tobacco Company with its principal place of business located at 667 Madison Avenue, New York, New York 10021. LOEWS CORPORATION is a successor in interest to the American Tobacco Company due to its ownership of Lorillard Tobacco Company. LOEWS CORPORATION benefited from slave labor because its subsidiary was formed out of the American Tobacco Company that benefited from assets acquired by R. J. Reynolds Tobacco Company from the uncompensated labor of enslaved Africans.

# **RAILROAD INDUSTRY**

## **CANADIAN NATIONAL RAILWAY CO.**

CANADIAN NATIONAL RAILWAY CO. is a corporation with its principal place of business located at 935 de La Gauchetiere St. West, Montreal, QU H3B 2, Canada. It is the successor-in—interest to seven predecessor railroad lines, that were constructed and/or run in part by slave labor.<sup>20</sup> Such use of enslaved Africans was an unfair business practice set forth by Slave Codes created and enforced by states.

Furthermore, upon information and belief, CANADIAN NATIONAL was approached by members of the general public to verify their historical connection to slavery. They denied any connection.

## **CSX**

CSX is a Virginia corporation with its principal place of business located at 901 E. Cary Street, Richmond, VA 23219. It is a successor-in-interest to numerous predecessor railroad lines that were constructed or run, at least in part, by slave labor.

## **NORFOLK SOUTHERN**

NORFOLK SOUTHERN is a corporation with its principal place of business located at Three Commercial Place, Norfolk Virginia 23410-9227. It is a successor-in-interest to numerous railroad lines that were constructed or run, in part, by slave labor.

## **UNION PACIFIC**

UNION PACIFIC is a corporation with its principal place of business located at 1416 Dodge Street, Omaha, Nebraska 68179. It is a successor-in interest to numerous predecessor railroad lines that were constructed or run in part by slave labor.

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<sup>20</sup> Jim Cox, *USA Today*, Feb. 21, 2002, citing Canadian National's ownership of seven rail lines built and/or operated by enslaved Africans including Mobile & Ohio which valued slaves lost to emancipation at \$199,691 in 1865 (valued today at \$2.2 million).

## **TEXTILE**

### **WESTPOINT STEVENS**

WESTPOINT STEVENS is a corporation with its principal place of business located at 1185 Avenue of Americas, New York, New York 10036. It is a successor-in-interest to Pepperell Manufacturing which utilized cotton from Southern planters farmed by enslaved Africans. Such use of enslaved Africans was an unfair business practice set forth by the cruel and inhumane Slave Codes created and enforced by states. Planters in turn purchased the finished product, a cheap, coarse cloth called “Negro cloth,” to clothe their human chattel. The fabric served as a reminder to enslaved Africans of their inferior status in life.<sup>21</sup>

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<sup>21</sup> Jim Cox, “Textile Firm Linked to ‘Negro Cloth’ for slaves,” *USA Today*, Feb. 21, 2002.