

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

BILL OF INFORMATION FOR  
WIRE FRAUD

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO.
v.	*	SECTION:
KEISHANDRA HOUSTON	*	VIOLATION: 18 U.S.C. § 1343
	*	*
	*	*

The United States Attorney charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

1. The defendant, **KEISHANDRA HOUSTON**, resided the Eastern District of Louisiana.
2. British Petroleum (BP) was a company whose activities included oil exploration and production in the United States and elsewhere and whose subsidiaries included BP Exploration and Production, Inc. (BP Exploration).

3. On or about April 20, 2010, an explosion and fire occurred on the Deepwater Horizon, an oil rig in the Gulf of Mexico that had been drilling an exploration well. The resulting oil spill, with which BP was associated, caused oil pollution across the Gulf of Mexico.

4. From in or about May 2010 through on or about August 23, 2010, BP operated a process for submission directly to BP and resolution by BP of claims of individuals and businesses for costs, damages, and other losses incurred as a result of the oil discharges due to the Deepwater Horizon incident.

5. In or about June 2010 BP established the Gulf Coast Claims Facility (GCCF) for the purpose of administering, mediating, and settling certain claims of individuals and businesses for costs, damages, and other losses incurred as a result of the Deepwater Horizon incident. The GCCF was administered by Kenneth R. Feinberg, a fund administrator responsible for decisions relating to the administration and processing of claims by the GCCF. On or about August 23, 2010, the GCCF began receiving and processing such claims, and BP ceased receiving and processing claims of individuals and businesses for costs, damages, and other losses incurred as a result of the oil discharges due to the Deepwater Horizon incident.

6. On or about August 6, 2010, BP Exploration established the Deepwater Horizon Oil Spill Trust, an irrevocable common law trust formed under Delaware law, to receive and to distribute funds that BP Exploration promised to provide for the payment of certain types of claims, costs, and expenses, including, but not limited to, those resolved by the GCCF.

**B. THE SCHEME:**

In or about September 2010, in the Eastern District of Louisiana, the defendant, **KEISHANDRA HOUSTON**, devised and intended to devise a scheme to defraud the GCCF, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises. It was part of the scheme that, in or about September 2010, the defendant, **KEISHANDRA HOUSTON**, falsely claimed to the GCCF that she had lost earnings due to the Deepwater Horizon incident. The defendant, **KEISHANDRA HOUSTON**, falsely claimed to have been employment as a cook. It was further part of the scheme that, in or about September 2010, the defendant created two false earnings statements which incorrectly indicated that the defendant was employed by a seafood restaurant.

**C. THE WIRE:**

On or about September 30, 2010, in the Eastern District of Louisiana, for the purpose of executing the above-described scheme, and attempting to do so, the defendant, **KEISHANDRA HOUSTON**, did transmit and cause to be transmitted by means of wire communication in interstate commerce, certain writings, signals, and sounds; that is the defendant, **KEISHANDRA HOUSTON**, caused the aforementioned false earnings statements to be transmitted by means of an email wire communication to the computer servers of the GCCF in Dublin, Ohio.

All in violation of Title 18, United States Code, Section 1343.

## NOTICE OF FRAUD FORFEITURE

1. The allegations of Count 1 of this Bill of Information are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1343 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

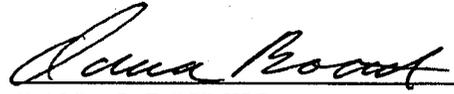
2. As a result of the offense alleged in Count 1, defendant, **KEISHANDRA HOUSTON**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 1343.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

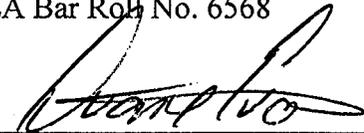
All in violation of Title 18, United States Code, Sections 1343 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).



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New Orleans, Louisiana  
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