

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

<b>UNITED STATES OF AMERICA</b>	*	<b>CRIMINAL NO: 13-054</b>
v.	*	<b>SECTION: "K"</b>
<b>MILLETTE WOMACK</b>	*	
*	*	*

**FACTUAL BASIS**

Should this matter have gone to trial, the government would have proven beyond a reasonable doubt, through the introduction of competent testimony and admissible tangible exhibits, the following to support the allegations charged by the government in the one-count Bill of Information now pending against the defendant, **MILLETTE WOMACK**.

On April 20, 2010, an explosion and fire occurred on the Deepwater Horizon, an oil rig in the Gulf of Mexico where British Petroleum (BP) had been drilling a well. Thereafter, BP established the Gulf Coast Claims Facility (GCCF) to administer, mediate, and settle certain claims of individuals and business for losses incurred as a result of the Deepwater Horizon incident. The GCCF began receiving and processing such claims on and after August 23, 2010. The GCCF required any individual filing a claim to submit valid documentation as proof of loss or reduction in earnings due to the oil spill.

**MILLETTE WOMACK** (WOMACK) agreed with other individuals (**WOMACK's** co-conspirators) to make a false claim to the GCCF for lost earnings. Pursuant to their agreement, **WOMACK** provided her personal identifier information to the co-conspirators to create fraudulent supporting documentation which would be submitted along with her false claim to GCCF. **WOMACK** agreed to share part of any claim proceeds with her co-conspirators.

Accordingly, on or about October 24, 2010, the GCCF received **WOMACK's** online claim form seeking an emergency 6-month payment in the amount of \$10,000, wherein **WOMACK** falsely stated she lost earnings as a result of the Deepwater Horizon oil spill. Documentation in support of **WOMACK's** claim included copies of fraudulent earning statements indicating that prior to the oil spill, **WOMACK** had worked as a line cook at Don's Seafood Hut Restaurant & Oyster Bar, when, in fact, she was never so employed. The email transmitting the false claim form at issue and the supporting documentation originated in the New Orleans area and was received by GCCF's server in Dublin, Ohio. As a result of these false representations and documentation contained in the claim, the GCCF paid **WOMACK** approximately \$8,100.00 on or about December 2, 2010, and \$5,000 on or about January 6, 2011.

**WOMACK** admitted the foregoing to agents of the United States Federal Bureau of Investigation.

The government would prove that the amount of loss for the purposes of this offense is approximately \$13,100.

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MILLETTE WOMACK  
Defendant

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Date

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GEORGE CHANEY, JR. (22215)  
Attorney for Defendant

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Date

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LOAN "MIMI" NGUYEN (23612)  
Assistant United States Attorney

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Date