

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

U.S. DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA
FILED 10-2-2014
WILLIAM W. BLEVINS
CLERK

(Bey)

UNITED STATES OF AMERICA * CRIMINAL NO: 14-186
v. * SECTION: "I"
RAMONA HUDSON *
* * *

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, including the testimony of Special Agents of the United States Secret Service, Postal Inspectors of the United States Postal Inspection Service and employees of the Gulf Coast Claims Facility ("GCCF") and others, the following facts, to support the allegations charged in the Bill of Information now pending against the defendant, **RAMONA HUDSON ("HUDSON")**.

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. An employee of the GCCF would testify that between May 1, 2010 and August 23, 2010, BP administered and settled claims on its own as a result of the Deepwater Horizon oil spill. Commencing on and after August 23, 2010, BP established the GCCF for the purposes of administering, mediating, and settling certain claims of individuals and businesses for losses incurred as a result of the Deepwater Horizon incident. Specifically, the GCCF began receiving and processing any and all claims as a result of the Deepwater Horizon oil spill on and after August 23, 2010 and BP ceased receiving and processing said claims. The GCCF required any individual filing a claim

on behalf of themselves, a business, or other individuals for a temporary or permanent loss or reduction in profits due to the oil spill to submit truthful and honest claim forms with truthful and honest documentation to prove that they or their business lost profits as a result of the oil spill. Emergency Advance Payments for damages resulting from the oil spill were available from August 23, 2010 through November 23, 2010.

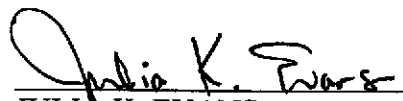
In or about September 2010, **RAMONA HUDSON** agreed with her daughter, L.A. to make a false BP claim for loss earnings. At that time, L.A. worked as a claims adjuster at the GCCF. Pursuant to their agreement, **HUDSON** agreed to provide her personal information and to share part of any claim proceeds with her daughter. A representative of the GCCF would introduce a claim form in the name of **RAMONA HUDSON** which was submitted electronically from Louisiana to the GCCF in Ohio on or about October 1, 2010. The claim form states that the defendant worked as an oyster harvester/deckhand in Venice, Louisiana, when in fact she had not. Defendant's claim form requested emergency advance payment for six months of loss earnings or profits, as a result of the Deep Water Horizon oil spill on April 20, 2010.

GCCF records would demonstrate that GCCF received via the internet on **HUDSON'S** behalf a fraudulent 2009 Schedule C, Form 1040 federal tax return, purportedly filed by defendant, showing that she operated a commercial fishing business in 2009 which was profitable. Additionally, the defendant caused to be submitted electronically other documentation indicating the defendant worked as a deckhand on a commercial oyster boat in Venice, Louisiana before the Deep Water Horizon oil spill.

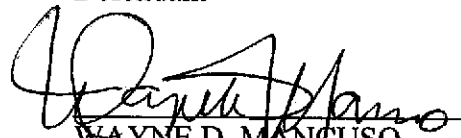
As a result of the defendant's submission via the internet of an Emergency Payment Claim form and receipt of the documentation, the GCCF authorized an emergency payment to

HUDSON. This money was sent in the form of a GCCF check bearing number 58656 in the amount of \$50,000 dated October 4, 2010 and a GCCF check bearing number 217376 in the amount of \$25,000 dated January 13, 2011. These checks were mailed to **HUDSON**, in Slidell, Louisiana. Of the \$75,000 **HUDSON** received from the GCCF, she paid L.A. \$25,000 for her assistance in processing the claim. Additionally, the Government would submit documentation from Whitney National Bank of New Orleans, Louisiana, demonstrating that the GCCF check bearing number 58656 was cashed by **HUDSON** on October 7, 2010, and the GCCF check bearing number 217376 was cashed by **HUDSON** on January 19, 2011.

Both the Government and the defendant, **RAMONA HUDSON**, do hereby stipulate and agree that the above facts set forth a sufficient factual basis for the crime to which the defendant is pleading guilty and that the Government would have proven these facts beyond a reasonable doubt at trial.


JULIA K. EVANS 10-2-14
Assistant United States Attorney Date


RAMONA HUDSON 10/2/2014
Defendant Date


WAYNE D. MANCUSO 10/2/14
Counsel for Defendant Date