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U.S. DISTRICT COURT
EASTERN DISTRICT OF LA.

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

BILL OF INFORMATION FOR WIRE FRAUD

FELONY

16-85

SECT. 1 MAG. 3

UNITED STATES OF AMERICA

*

CRIMINAL NO.

v.

*

SECTION:

SHANQUITTA JONES-DILLON

*

VIOLATION: 18 U.S.C. § 1343

*

* * *

The United States Attorney charges that:

COUNT 1
(Wire Fraud)

A. AT ALL TIMES MATERIAL HEREIN

1. The defendant, **SHANQUITTA JONES-DILLON**, was a resident of Plaquemines Parish in 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 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 claims related to the spill, 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.

7. To seek compensation payments from the GCCF for damages incurred as a result of the oil spill, individuals are required to complete a GCCF Claim Form. This claim form can be submitted electronically to the GCCF in Dublin, Ohio, through the use of the internet or a facsimile device. Approved damage claim payments are either mailed to the claimant or

transmitted by wire to the claimant's bank account.

B. THE SCHEME TO DEFRAUD

8. Beginning in 2010 and continuing through 2013, defendant, **SHANQUITTA JONES-DILLON**, knowingly and willfully devised and intended to devise a scheme and artifice to defraud the Gulf Coast Claims Facility of money. As part of the scheme, **SHANQUITTA JONES-DILLON** used false and fraudulent pretenses and material representations during the claims process to defraud the GCCF of monies totaling approximately \$63,497.63.

9. As part of the scheme to defraud, **SHANQUITTA JONES-DILLON** knowingly and willfully provided false employment information to the GCCF during the electronic claims process by claiming she was a deck hand on a shrimping vessel at the time of the Deepwater Horizon oil spill, and, therefore, suffered a loss of income due to the oil spill.

10. It was further part of the scheme and artifice to defraud that **SHANQUITTA JONES-DILLON**, from 2010 through 2013, used interstate wire communications that travelled across state lines between the Eastern District of Louisiana and the GCCF in Dublin, Ohio.

C. USE OF THE WIRES

11. **SHANQUITTA JONES-DILLON's** false and material representations during the claims process caused electronic signals and sounds to be transmitted by means of interstate wire communications across state lines between the Eastern District of Louisiana and the state of Ohio. These e-mail, telephone, internet, and facsimile wire communications furthered the scheme to defraud.

12. From 2010 through 2012, in the Eastern District of Louisiana and elsewhere, the defendant, **SHANQUITTA JONES-DILLON**, for the purpose of executing and attempting to execute the scheme and artifice to defraud set forth above and for the purpose of obtaining

money and property by means of false and fraudulent pretenses, and material misrepresentations, as set forth above, did unlawfully, willfully, and knowingly transmit and cause to be transmitted, in interstate commerce, certain writings, signs, signals, and sounds by means of wire and radio communication, between the Eastern District of Louisiana and the states of Ohio and New York; to wit, and solely as an example: on or about June 2, 2011, and in furtherance of the scheme to defraud, **SHANQUITTA JONES-DILLON** caused the GCCF to wire an electronic payment of \$32,932.20 in interstate commerce across state lines to a bank account in the Eastern District of Louisiana controlled by **SHANQUITTA JONES-DILLON**.

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

NOTICE OF 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, **SHANQUITTA JONES-DILLON**, 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 defendant 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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