

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

**UNITED STATES OF AMERICA**

**\* CRIMINAL NO. 20-92**

**v.**

**\* SECTION: "R"**

**CORNELIUS GARRISON**

**\***

**DONIESHA GIBSON**

**\***

**CHANDRIKA BROWN**

**ISHAIS PRICE**

**\***

**AISHA THOMPSON**

**DEWAYNE DEWAYNE COLEMAN**

**\***

**DONISESHA LEE**

**a/k/a Donisha Lee**

**\***

**DONREION LEE**

**ERICA LEE THOMPSON**

**\***

**\* \* \***

**FACTUAL BASIS AS TO ERICA LEE THOMPSON**

**Introduction**

Should this matter have gone to trial, the government would have proved through the introduction of reliable testimony and admissible tangible exhibits, including documentary evidence, the following to support the allegations charged by the government in Count 1 of the Indictment now pending against the defendant, **ERICA LEE THOMPSON ("ERICA LEE")**, charging her with a violation of Title 18, United States Code, Section 371, namely, conspiracy to commit mail fraud. The Defendant, along with her co-conspirators and others, beginning at a time unknown and continuing through the date of the Indictment, in the Eastern District of Louisiana, and elsewhere, conspired to commit mail fraud in connection with staged accidents, including one that occurred on September 6, 2017.

AUSA BK  
Defendant EL  
Defense Counsel AL

### Background

The section of Interstate 10 eastbound, milepost 239, near the Almonaster exit was located in the Eastern District of Louisiana. Averitt Express, Inc. ("Averitt") was an interstate commercial trucking company headquartered in Cookeville, Tennessee. ACE American Insurance Company ("ACE") was headquartered in Philadelphia, Pennsylvania. Averitt was self-insured up to \$1,000,000.00 for vehicle accidents, and ACE provided excess insurance coverage for Averitt. GEICO Insurance Company ("GEICO") maintained offices throughout the United States, including Macon, Georgia. GEICO insured the vehicle purportedly used by **ERICA LEE** on or about September 6, 2017. GEICO utilized a law firm based in New Orleans to provide legal representation with respect to the vehicle purportedly used by **ERICA LEE** on or about September 6, 2017. On or about July 25, 2018, a Petition for Damages was filed in CDC, on behalf of **ERICA LEE** ("Erica Lee Lawsuit"). The Erica Lee Lawsuit sought to recover damages from Averitt and Truck Driver A. On or about August 27, 2018, a Petition for Damages was filed in CDC, on behalf of Aisha Thompson, Dewayne Coleman, Donisha Lee, and Donreion Lee ("Thompson Lawsuit"). The Thompson Lawsuit sought to recover damages from Averitt, ACE, GEICO, Truck Driver A, and **ERICA LEE**.

### The Offense

At a time unknown but prior to on or about September 6, 2017, Co-Conspirator B contacted **ERICA LEE** and arranged a meeting for **ERICA LEE** and Passenger A for the purpose of staging an automobile accident. Dewayne Coleman, Donisha Lee, Donreion Lee, and **ERICA LEE** agreed to stage an automobile accident. Dewayne Coleman, Donisha Lee, Donreion Lee, and **ERICA LEE** used **ERICA LEE**'s RAV4 to pick up Passenger A and Slammer Co-Conspirator ("Slammer"). Dewayne Coleman, Donisha Lee, Donreion Lee, and **ERICA LEE** agreed to allow



Slammer to drive **ERICA LEE's** RAV4 for the purpose of staging an automobile accident with a tractor-trailer in order to obtain money through fraud. Slammer drove Dewayne Coleman, Donisha Lee, Donreion Lee, **ERICA LEE**, and Passenger A in the RAV4 to locate another vehicle to collide with on Interstate 10 in the vicinity of the Almonaster exit. At approximately 10:05 P.M., Slammer, while driving east on Interstate 10, observed a 2016 Freightliner tractor-trailer operated by Averitt, and Slammer intentionally collided with the Averitt tractor-trailer. Slammer exited **ERICA LEE's** RAV4 after the collision and told **ERICA LEE** to get behind the wheel of the RAV4 to make it appear that **ERICA LEE** was driving the vehicle at the time of the staged accident. After the staged accident, **ERICA LEE** contacted the NOPD to report that she had been in an automobile accident. **ERICA LEE** falsely reported to the NOPD that she had been the driver of the RAV4 and that the tractor-trailer had struck her vehicle. Passenger A falsely claimed to the NOPD that she was Aisha Thompson.

Approximately one or two days after the staged accident, Coleman, Donisha Lee, Donreion Lee, **ERICA LEE**, and Aisha Thompson went to an attorney's office for the purpose of collecting money from the insurance and trucking company. Coleman, Donisha Lee, Donreion Lee, **ERICA LEE**, and Aisha Thompson sought medical treatment from doctors and healthcare providers. Aisha Thompson treated for approximately six months despite not being in the RAV4 at the time of the staged accident.

On or about April 11, 2018, and on or about July 6, 2018, the attorney for Coleman, Donisha Lee, Donreion Lee and Aisha Thompson mailed an envelope from his/her office, \*\*\*\*, New Orleans, LA 70130, via the U.S. Postal Service to ACE American Insurance Company, Attn: V.B., 436 Walnut Street, Philadelphia, PA 19106-3703, containing a settlement demand on behalf

of clients Aisha Thompson, Coleman, Donisha Lee, and Donreion Lee demanding "policy limits in full and final settlement of this claim."

On or about March 1, 2019, GEICO mailed four (4) settlement checks, based on false statements and representations, payable to Aisha Thompson, Coleman, Doniseha Lee, Donreion Lee, and their attorneys totaling approximately \$30,000.00, from GEICO's offices in Macon, Georgia to GEICO's attorneys located at \*\*\*\*, New Orleans, LA 70163-1116. On or about March 25, 2019, Coleman endorsed a settlement check in the approximate amount of \$7,500.00. On or about March 25, 2019, Donreion Lee endorsed a settlement check in the approximate amount of \$9,000.00. On or about March 26, 2019, Donisha Lee endorsed a settlement check in the approximate amount of \$6,000.00. On or about March 26, 2019, Aisha Thompson endorsed a settlement check in the approximate amount of \$7,500.00. The amount of loss attributable to **ERICA LEE** and other co-defendants who participated in this accident is \$30,000.00.

On or about March 26, 2019, Coleman, Donisha Lee, and Donreion Lee each provided false testimony in depositions taken in conjunction with the Thompson Lawsuit. On or about April 9, 2019, Aisha Thompson provided false testimony in a deposition taken in conjunction with the Thompson Lawsuit. In these depositions, Coleman, Donisha Lee, Donreion Lee, and Aisha Thompson lied about the September 6, 2017 accident including, but not limited to, who was driving the RAV4 and the extent of their injuries.

The government would introduce incriminating statements made by **ERICA LEE** to the FBI on March 5, 2020. In this FBI interview, **ERICA LEE** admitted to participating in a staged automobile accident that occurred on September 7, 2017, involving herself, Donisha Lee, Donreion Lee, Dewayne Coleman, and a mutual friend ("Passenger A"). According to **ERICA LEE**, she recruited everyone in the car and they all knew that the purpose of the staged accident



was to fraudulently obtain money from the insurance company. **ERICA LEE** told the FBI that on the day of the staged accident, she picked up Donisha Lee, Donreion Lee, and Dewayne Coleman in the RAV4. The group then went to a gas station of Elysian Fields and picked up an unknown black male (Slammer) and the unknown black female (Passenger A). **ERICA LEE** said that Slammer drove her RAV4 on to Interstate 10 and then intentionally drove the RAV4 into an 18-wheeler. Then, according to **ERICA LEE**, Slammer said he needed to get out of the vehicle immediately. Slammer exited the RAV4 from the passenger side and disappeared into another vehicle.

**ERICA LEE** said the driver of the vehicle was a tall slim black male (Slammer). **ERICA LEE** identified the Slammer from a dash camera video clip shown to her by the FBI. **ERICA LEE** said the vehicle used in the staged accident was her Toyota RAV4. **ERICA LEE** filed a false police report with the New Orleans Police Department ("NOPD") in which she claimed to be the driver at the time of the staged accident. Further, Passenger A lied to the NOPD officer when she claimed to be Aisha Thompson.

**ERICA LEE** said she was directed to a specific attorney in New Orleans and said she was told that everyone in the vehicle would receive \$100,000 after they sued the truck's insurance provider. **ERICA LEE** used the attorney who was recommended and that same attorney sent her for medical treatment.

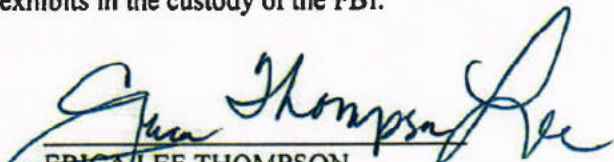
In addition, the government would introduce dash camera video evidence of Slammer making his escape from the RAV4 after the accident while the RAV4 was in the East-bound lane of traffic on the I-10.


**Limited Nature of Factual Basis and Conclusion**

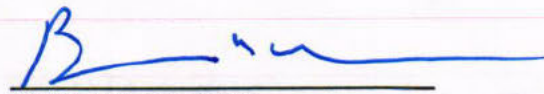
This proffer of evidence is not intended to constitute a complete statement of all facts known by **ERICA LEE**, and/or the government. Rather, it is a minimum statement of facts intended to prove the necessary factual predicate for her guilty plea. The limited purpose of this proffer is to demonstrate that there exists a sufficient legal basis for the plea of guilty to the charged offense by **ERICA LEE**.

The above facts come from an investigation conducted by, and would be proven at trial by credible testimony from, *inter alia*, Special Agents and forensic examiners from the Federal Bureau of Investigation and admissible tangible exhibits in the custody of the FBI.

READ AND APPROVED:

  
ERICA LEE THOMPSON  
Defendant

  
ARTHUR A. LEMANN, IV  
Counsel for Defendant

  
BRIAN M. KLEBBA  
Assistant United States Attorney