

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

**UNITED STATES OF AMERICA**

\*

**CRIMINAL NO. 19-219**

**v.**

\*

**SECTION: L**

**GENETTA ISREAL**

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**FACTUAL BASIS**

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 Superseding Indictment now pending against the defendant, **GENETTA ISREAL**, charging her with a violation of Title 18, United States Code, Section 371, namely, conspiracy to commit wire fraud. The Defendant, along with her co-conspirators and others, in the Eastern District of Louisiana, and elsewhere, conspired to commit wire fraud in connection with a staged accident that occurred on June 12, 2017 in which the Defendant was a passenger.

Defendant's co-conspirators, Larry Williams and another individual ("Individual A"), agreed on a plan in which they would intentionally collide with a tractor-trailer in a staged collision. Defendant was not aware of the agreement at the time of the accident. Following the accident, Defendant agreed to attempt to recover monetary damages from the owner and insurer of the tractor-trailer in connection with purported injuries suffered as a result of the staged accident.

On June 12, 2017, the Defendant, **ISREAL**, and Individual A met Damian Labeaud in the Trailblazer in New Orleans. Labeaud drove the Trailblazer to the Danzinger Bridge and parked the Trailblazer in the eastbound far right-lane on Chef Menteur Highway waiting to locate a tractor-trailer with which Labeaud would stage an accident.

AUSA   
Defendant  
Defense Counsel 

At approximately 11:30 A.M., Labeaud located and intentionally collided with a 2015 Peterbilt tractor-trailer owned by Southeastern Motor Freight, Inc. ("SMF"), which was driving east on Chef Menteur Highway. Immediately after the accident, Labeaud exited the Trailblazer and left the scene of the accident. Larry Williams switched into the driver's seat of the Trailblazer to make it appear as though Larry Williams was driving the vehicle at the time of the accident. Immediately after the accident, on June 12, 2017, Larry Williams, and Individual A contacted the New Orleans Police Department ("NOPD") to report the accident. The NOPD arrived on the scene shortly thereafter and Larry Williams lied to NOPD officers stating that he had been the driver of the Trailblazer at the time of the accident. At no time did the Defendant tell NOPD officers that Labeaud had been the driver of the Trailblazer at the time of the accident.

After the accident, Labeaud contacted Attorney A and arranged a meeting at Attorney A's office. Present for this meeting were Attorney A, Labeaud, the Defendant, Larry Williams, and Individual A. The purpose of this meeting was to discuss Attorney A's representation of the Defendant, Larry Williams, and Individual A in connection with seeking monetary damages from the owner and insurer of the 2015 Peterbilt tractor-trailer in connection with the staged accident that had taken place on June 12, 2017. As a result of this meeting with Attorney A, the Defendant, Larry Williams, and Individual A all hired Attorney A to represent them.

On June 12, 2018, Attorney B, an attorney who worked with Attorney A, filed a personal injury lawsuit on behalf of the Defendant, Larry Williams, and Individual A against SMF and its insurers, Hudson Specialty Insurance Company and Napa River Insurance Services ("NAPA"), in the Civil District Court for the Parish of Orleans in the State of Louisiana ("the Larry Williams Lawsuit"). The allegations in the Larry Williams Lawsuit were false in that they did not contain information about how Labeaud intentionally caused the June 12, 2017 accident with the 2015

Peterbilt tractor-trailer. Furthermore, the Larry Williams Lawsuit falsely alleged that Larry Williams had been the driver of the Trailblazer during the accident and omitted material information about how the accident was staged. On June 27, 2018, an employee of SMF in Jefferson, Louisiana sent an email that traveled across state lines to an employee of NAPA in Indianapolis, Indiana that attached the Larry Williams lawsuit.

On September 20, 2018, the Defendant was deposed in connection with the Larry Williams Lawsuit. The Defendant lied during that deposition and omitted key material facts. Namely, the Defendant provided false testimony about the circumstances of the June 12, 2017 accident and covered-up the fact that Labeaud had been the driver in this staged accident. During the course of the Larry Williams lawsuit, Attorney B made a settlement demand attempting to resolve the case.

In sum, the Government's evidence would prove the defendant, **GENETTA ISREAL**, conspired to commit wire fraud by causing the filing of the Larry Williams Lawsuit seeking monetary damages that was premised on falsehoods in connection with the June 12, 2017 staged automobile accident, providing false information during the course of the Larry Williams Lawsuit in an effort to recover monetary damages against the owner and operator of the 2015 Peterbilt tractor-trailer, and causing the use of interstate wire communications to facilitate a recovery with this staged accident.

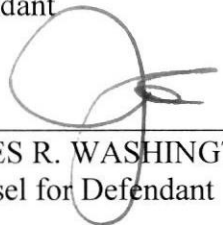
**Limited Nature of Factual Basis**


This proffer of evidence is not intended to constitute a complete statement of all facts known by **GENETTA ISREAL**, 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 **GENETTA ISREAL**.

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:

  
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GENETTA ISREAL  
Defendant

  
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JAMES R. WASHINGTON, III  
Counsel for Defendant

  
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BRIAN M. KLEBBA  
Assistant United States Attorney