

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 AISHA 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, **AISHA THOMPSON** ("THOMPSON"), 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 BR  
Defendant AT  
Defense Counsel BN

### 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 **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 **THOMPSON**.

Approximately one or two days after the staged accident, Coleman, Donisha Lee, Donreion Lee, Erica Lee, and **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 **THOMPSON** sought medical treatment from doctors and healthcare providers. **THOMPSON** was treated 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, defendant's attorney 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 **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 **THOMPSON**, Coleman, Donisha 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 [REDACTED]. 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, **THOMPSON** endorsed a settlement check in the approximate amount of \$7,500.00. The amount of loss attributable to **THOMPSON** 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, **THOMPSON** provided false testimony in a deposition taken in conjunction with the Thompson Lawsuit. In these depositions, Coleman, Donisha Lee, Donreion Lee, and **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 **THOMPSON** to the FBI on March 6, 2020. In this FBI interview, **THOMPSON** admitted that she was not a passenger, nor was she present in the staged automobile accident with an 18 wheeler occurring on I-10 on September 6, 2017. According to **THOMPSON**, Erica Lee, Donreion Lee, Donisha Lee, Dewayne Coleman, an unknown black male (Slammer), and a black female named (Passenger A) were in the vehicle at the time of the alleged accident. **THOMPSON** told the FBI agents she was contacted by her relatives (Erica Lee, Donreion Lee, and Donisha Lee) to accompany them to see an attorney in New Orleans. **THOMPSON** was told by her relatives that Passenger A had given the police officers the name **AISHA THOMPSON** at the scene of the incident.



**THOMPSON** willingly went to the attorney's office knowing that the accident was staged. **THOMPSON** told the FBI that she learned that the black man (Slammer) had been the driver of the RAV4 and was working with Co-Conspirator B. After the alleged collision, Slammer got out of the RAV4, got into another vehicle that had been following the RAV4, and fled the scene.

While at the attorney's office, **THOMPSON** met Co-Conspirator B. Co-Conspirator B went into a back office with the attorney. When Co-Conspirator B returned a few minutes later she was holding an envelope. **THOMPSON** believed the envelope contained cash or a check for the staged accident. **THOMPSON** said she knew the accident was staged and that Co-Conspirator B had helped put it together. **THOMPSON** later lied in an April 9, 2019 deposition when she claimed Erica Lee was the driver of the RAV4 at the time of the staged accident.

**THOMPSON** also told the FBI that she sought medical treatment despite not being in the vehicle at the time of the collision. **THOMPSON** said she failed to tell her physical therapist that her back pains were the result of an accident occurring over two (2) years prior to the staged September 6, 2017 event. **THOMPSON** admitted to receiving a settlement check arising out of this staged accident.

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 **THOMPSON**, 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


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offense by **THOMPSON**.

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:

  
AISHA THOMPSON  
Defendant

  
GAYNELL WILLIAMS  
Counsel for Defendant

  
BRIAN M. KLEBBA  
Assistant United States Attorney