

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

UNITED STATES OF AMERICA

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CRIMINAL NO. 13 - 143

v.

*

SECTION: "J"

CLARISSA O. MORGAN

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FACTUAL BASIS

Were this matter brought to trial, the United States would prove, through competent witnesses and documentary evidence, the following beyond a reasonable doubt.

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. Thereafter, BP established the Gulf Coast Claims Facility (GCCF) to administer, mediate, and settle certain claims of individuals and business for losses incurred as a result of the Deepwater Horizon incident. The GCCF began receiving and processing such claims on August 23, 2010. The GCCF required any individual filing a claim to submit valid documentation as proof of loss or reduction in earnings due to the oil spill.

The GCCF was an entity established by British Petroleum to process and settle claims of individuals and business for losses incurred as a result of the Deepwater Horizon incident. On or

about September 27, 2010, **Morgan** submitted a fraudulent claim to the GCCF for an Emergency Advance Payment. At the time of the spill, **Morgan** was working as a housekeeper for the Queen and Crescent Hotel in New Orleans. In furtherance of her claim, **Morgan** submitted a fraudulent letter from her employer indicating that her work hours at the hotel had been cut due to lack of business caused by the Deepwater Horizon incident. The letter was supposedly written and signed by Felix Jackson, the general manager of Queen and Crescent Hotel. In addition to the fraudulent letter, **Morgan** also submitted various pay stubs and W2s to the GCCF. The GCCF processed the claim and paid **Morgan** \$5,300 in October 2010 and \$5,000 in January 2011. The second check was mailed to **Morgan** on January 18, 2011. The check was mailed from New York to her house in New Orleans by FedEx.

After the payments were issued, a Guidepost Solutions investigator interviewed the Director of Human Resources for the Queen and Crescent Hotel at her office in Metairie, Louisiana. The director examined the employment verification letter submitted by **Morgan** and said that it was fabricated. She said that no one named Felix Jackson was employed by the hotel. She also stated that she writes all employment letters for the hotel and she did not write the one signed by Jackson. The director also confirmed that **Morgan** was employed by the hotel at the time of the spill, but said she was neither laid off nor had her hours reduced because of the spill.

On September 26, 2012, **Morgan** was interviewed at her home by a special agent with the FBI about the matter. During the interview, **Morgan** acknowledged that she filed a claim with BP/GCCF. **Morgan** stated that she made a claim to the fund because her hours were cut as a result of the BP oil spill. **Morgan** was questioned about the letter she submitted with her claim from her employer. **Morgan** admitted that she prepared the fraudulent letter and submitted it

with her claim. She also acknowledged that Felix Jackson was not a general manager with the Queen and Crescent Hotel.

In conclusion, **Morgan** admits that she committed mail fraud when she caused the GCCF, through the filing of her fraudulent claim, to mail a check from New York to her house in New Orleans.

APPROVED AND ACCEPTED:

CLARISSA MORGAN
Defendant

Date

ROMA KENT
Attorney for Defendant

Date

SPIRO G. LATSIS
Assistant United States Attorney

Date