

UNITED STATES OF AMERICA                    \*       CRIMINAL DOCKET NO:  
  
                 V.                                  \*       SECTION:  
  
KWANZA WELLS                                 \*

## FACTUAL BASIS

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 and after 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.

**KWANZA WELLS** (hereinafter **WELLS**) agreed with another individual (**WELLS'** co-conspirator) to make a false claim to the CCF for lost earnings. Pursuant to their agreement, **WELLS'** co-conspirator provided **WELLS** with fraudulent documentation to submit along with her false claim to GCCF and **WELLS** agreed to share part of any claim proceeds with her co-conspirator. Accordingly, on October 13, 2010, the GCCF received **WELLS'** online claim form seeking an emergency 6-month payment in the amount of \$19,500, wherein **WELLS** falsely stated she lost earnings as a result of the Deepwater Horizon oil spill.

Documentation in support of **WELLS'** claim included copies of fraudulent W-2 wage statements and pay stubs indicating that prior to the oil spill, **WELLS** had worked as a hotel manager earning \$47,820 annually, when in fact she had not. As a result of these false representations and documentation, the GCCF determined **WELLS** was entitled to an emergency payment in the amount of \$19,500. The payment was wired from the Deep Water Horizon Oil Spill Trust to **WELLS'** Shell New Orleans Federal Credit Union account in New Orleans, Louisiana on about October 25, 2010.

After being advised of her constitutional rights, **WELLS**  
admitted the foregoing to agents of the United States Secret Service  
and the Federal Bureau of Investigation.



KWANZA WELLS  
Defendant

9-6-14  
DATE



ROBERT JENKINS  
Attorney for Kwanza Wells

9-6-14  
DATE

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IRENE GONZALEZ  
Assistant United States Attorney

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DATE