

Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence of  
the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington.

November 19 20 19  
WILLIAM M. McCOOL, Clerk  
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
CONNIE L. BIGELOW,  
  
Defendant.

**CR19-242** RSL  
NO.  
INDICTMENT

The Grand Jury charges that:

**COUNT ONE**

**(Arson)**

On or about April 30, 2018, at Edmonds, within the Western District of  
Washington and elsewhere, CONNIE L. BIGELOW maliciously damaged and destroyed,  
and maliciously attempted to damage and destroy, by means of fire, a building and other  
real and personal property used in interstate and foreign commerce and in activity  
affecting interstate and foreign commerce, to wit: the building located at 23030  
Highway 99, Edmonds, Washington, containing the store CJN Miniatures LLC.

All in violation of Title 18, United States Code, Section 844(i).

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**COUNT TWO**

**(Wire Fraud)**

**BACKGROUND**

1. During all times material to this Indictment, CONNIE L. BIGELOW owned CJN Miniatures & More, a dollhouse miniatures, collectibles, and antiques shop located in the Western District of Washington.

2. In September 2017, CONNIE L. BIGELOW moved CJN Miniatures & More into a building located at 23030 Highway 99, Edmonds, Washington, referred to herein as the "Subject Property." CJN Miniatures & More maintained an inventory of miniatures and collectibles for sale, consigned items on behalf of other individuals, and rented out space to other vendors.

3. On or about October 1, 2017, CONNIE L. BIGELOW entered into a lease for the Subject Property. The lease term lasted three years and required BIGELOW to pay \$4,500 per month up until April 1, 2018. Pursuant to the lease, on April 1, 2018, the rent increased to \$5,000 per month, and continued at that rate until it expired, on October 1, 2021.

4. CONNIE L. BIGELOW insured CJN Miniatures & More at the Subject Property through State Farm Fire and Casualty Company ("State Farm"). State Farm Policy #98-CL-Z830-8 (the "Policy") covered CJN Miniatures & More at the Subject Property and was in place at all times material to this Indictment. Among other items, the Policy covered \$100,000 in loss to business personal property as well as loss of income. The Policy did not cover loss arising from arson.

5. Between October 2017 and April 2018, CONNIE L. BIGELOW had significant financial difficulties; BIGELOW fell behind on her rental payments for the Subject Property, paid her consignors late or not at all, wrote checks from her bank account that subsequently bounced for lack of sufficient funds, and repeatedly over drafted her bank account.

1       6.     On or about April 30, 2018, CONNIE L. BIGELOW intentionally set fire  
2 to the Subject Property, causing the Subject Property and some of the business inventory  
3 of CJN Miniatures & More, to include consignor and vendor property, to be damaged and  
4 destroyed by fire.

5       7.     CONNIE L. BIGELOW purposefully set fire to three distinct locations on  
6 the Subject Property, specifically, directly underneath three Thomas Kinkade paintings  
7 worth thousands of dollars, each of which was damaged in the fire.

8       8.     On or about May 1, 2018, CONNIE L. BIGELOW filed a claim with State  
9 Farm under the Policy, claiming losses as a result of the fire and actively concealing the  
10 fact that she set the fire.

11 **THE SCHEME AND ARTIFACE TO DEFRAUD**

12       9.     Introductory paragraphs 1 through 8 are realleged and incorporated herein  
13 as though fully set forth in this Count.

14       10.    Beginning on or about April 30, 2018 and continuing through a date  
15 unknown but no later than February 25, 2019, at Edmonds, within the Western District of  
16 Washington and elsewhere, defendant CONNIE L. BIGELOW devised and intended to  
17 devise a scheme and artifice to defraud State Farm and to obtain money by means of  
18 materially false and fraudulent pretenses, representations, and the concealment of  
19 material facts.

20       11.    The essence of the scheme and artifice to defraud was that CONNIE L.  
21 BIGELOW attempted to recover money under the Policy by making false representations  
22 about the cause of the fire at CJN Miniatures & More, and concealing the fact that she  
23 herself had intentionally set the fire.

24 **MANNER AND MEANS OF THE SCHEME AND ARTIFACE TO DEFRAUD**

25       12.    It was part of the scheme and artifice to defraud that CONNIE L.  
26 BIGELOW intentionally set fire to the Subject Property, causing the Subject Property  
27 and some of the inventory of CJN Miniatures & More to be damaged and destroyed.  
28

1       13.    It was further part of the scheme and artifice to defraud that, on or about  
2 May 1, 2018, CONNIE L. BIGELOW initiated a claim for coverage with State Farm  
3 under the Policy for losses arising from the fire she set.

4       14.    It was further part of the scheme and artifice to defraud that CONNIE L.  
5 BIGELOW concealed from State Farm the fact that she set the fire to the insured  
6 property and instead falsely claimed that the fire was caused by other means.

7       15.    It was further part of the scheme that CONNIE L. BIGELOW made  
8 materially false, misleading, and deceptive statements to law enforcement officials, and  
9 to State Farm and its agents, in an attempt to prevent law enforcement officials and State  
10 Farm from discovering that she had intentionally damaged and destroyed the insured  
11 property, for example, among other false statements, CONNIE L. BIGELOW told the  
12 Snohomish County Sheriff's Office that, when she left the Subject Property, "[t]here was  
13 no smoke smell or anything that seemed out of the ordinary" and told State Farm  
14 representatives that an unknown person broke into the business and started the fire.

15       16.    It was further part of the scheme and artifice to defraud that CONNIE L.  
16 BIGELOW emailed an agent of State Farm through interstate wires to provide  
17 documentation regarding her false claim and to substantiate her purported losses.

18       **EXECUTION OF THE SCHEME AND ARTIFACE TO DEFRAUD**

19       17.    On or about the date set forth below, at Edmonds, within the Western  
20 District of Washington and elsewhere, CONNIE L. BIGELOW, having devised the  
21 above-described scheme and artifice, and for the purpose of executing this scheme and  
22 artifice, did knowingly transmit and cause to be transmitted by wire communication in  
23 interstate commerce, writings, signs, signals, pictures, and sounds, to wit:

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27    //

Count	Date	Sender	Interstate Wire Transmission
2	May 3, 2018	CONNIE L. BIGELOW	Email sent from connie@cjnminiatures.com in the State of Washington, through another State, to mary.mcbride.gx7@statefarm.com

All in violation of Title 18, United States Code, Section 1343.


A TRUE BILL:

DATED: 11-19-2019

*Signature of Foreperson redacted pursuant to  
the policy of the Judicial Conference of the  
United States*

FOREPERSON

  
BRIAN T. MORAN  
United States Attorney

  
TODD GREENBERG  
Assistant United States Attorney

  
AMY JAQUETTE  
Assistant United States Attorney