

FILED

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANGELA FRASE,

Defendant.

) INFORMATION

) **5 : 24 CR 00355**

) CASE NO. _____

) Title 18, United States Code
) Section 1341

) **JUDGE POLSTER**

GENERAL ALLEGATIONS

At all times relevant to this Information unless otherwise specified:

1. Defendant ANGELA FRASE (“Defendant”) and her husband (“Person 1”), not charged herein, resided on Spruce Street in Sterling, Ohio (“subject home”) from in or around November 2007 until in or around July 2019.

2. Person 1 originally purchased the subject home as a duplex in July 1997, with his brother (“Person 2), not charged herein. In or around November 2007, Defendant bought Person 2’s share of the property.

3. “Insurance Company” was an insurance company headquartered in Columbus, Ohio, that offered auto, home, life, and business insurance through independent insurance agents in several states and in the Northern District of Ohio.

4. “Insurance Agency” was an independent insurance agency located in Seville, Ohio, within the Northern District of Ohio. “Insurance Agency” originally sold KF an “Insurance Company” homeowners’ insurance policy regarding subject home. In or around July 2008, Person 2 amended the policy, naming Person 1 as the insured.

5. “Home Relocation Company” was an emergency home relocation service serving the insurance industry headquartered in Vernon Hills, Illinois. “Home Relocation Company” placed policy holders into hotels and fully furnished temporary housing after an insured incident made their home uninhabitable.

6. “Insurance Adjusting Company” was a licensed, public insurance adjuster business located in Lakewood, Ohio. Insurance Adjusting Company assisted property owners, commercial and residential, in making property insurance claims with their insurance companies.

COUNTS 1-4

(Mail Fraud, 18 U.S.C. §§ 1341 and 2)

The United States Attorney charges:

7. The general allegations of paragraphs 1 through 4 of this Information are re-alleged and incorporated by reference as if fully set forth herein.

8. From on or about June 1, 2019, through June 17, 2020, in the Northern District of Ohio, Eastern Division, Defendant ANGELA FRASE did knowingly devise and intend to devise a scheme and artifice to defraud “Insurance Company” and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

9. It was part of the scheme and artifice to defraud that:

a. From in or around 2012 to the present, Defendant and Person 1 converted the subject home from a duplex into a single-family home.

b. On or about June 16, 2019, Defendant made the following post on her Facebook account: “The water keeps getting closer and closer! I pray is doesn’t rain anymore or we are going to be in big trouble. They already closed down Miller Rd. Our yard is going to be one big muddy mess! I’m dreading already the clean-up. Here are some more pics of our side & back yard and the field that was soy beans. The Farmers lost all that crop.”

c. On or about June 16, 2019, Defendant made the following reply to a comment posted on her Facebook account: "It's time to sell this place and move. Deal with this at least 4 to 5 times a year."

d. On or about July 2, 2019, Defendant called the Sterling Fire Department to report a living room fire in the subject home. Defendant reported the fire was one of multiple fires that occurred in the subject home recently as a result of electrical issues. The Sterling Fire Department extinguished the fire and noted that no electrical breakers were tripped.

e. On or about July 3, 2019, Defendant called the Sterling Fire Department to report that the subject home was full of smoke. The fire department arrived and extinguished the fire. The Fire Marshall was called out to assist and found the fire originated on the second floor and determined that the cause of the fire was "undetermined."

f. On or about July 3, 2019, Defendant and Person 1 moved out the subject home temporarily and moved in with one of Defendant's relatives.

g. On or about July 3, 2019, Defendant made the following post on her Facebook account: "When it rains it pours! Had two electrical fires at the house. Really sucks. They turned off all the electric, extensive damage and we are not allowed to stay there. Pretty much of the house has to be remodeled and all new electrical work run throughout."

h. On or about July 3, 2019, Defendant posted the following reply to a comment on her Facebook account: "...right now I'm at my sister's until Sunday, then not sure where we will be. We have great insurance, so I hope they will be putting us up in a hotel or a rental. They said it will be for three or four months. The whole house has to be rewired up to code. Right now it had knob & tube spliced into new wiring. So illegal. They couldn't believe it hasn't burnt down before now.... So pretty much the whole house is going to be remodeled.

We was working on that anyways, but damn I didn't want it burn to get it done. It totally sucks!!”

i. On or about July 3, 2019, a neighbor offered to Person 1 the use of his electricity to power Person 1's sump pump as the power at the subject home had been turned off. Person 1 responded, “if you want to help me, you can blow the rest of the house up.”

j. On or about July 5, 2019, “Home Relocation Company” placed Defendant and Person 1 in a hotel room at the “Hotel 1” in Seville, Ohio.

k. On or about July 15, 2019, Defendant and Person 1 checked out of the Quality Inn and moved to a hotel room at “Hotel 2” located on Park Avenue West, in Seville, Ohio, paid for by “Home Relocation Company.”

l. On or about July 30, 2019, the Wayne County Sheriff's Office responded to the subject home regarding a burglary report. Multiple items throughout the home were damaged, but nothing was stolen. Multiple firearms located in the living room were not tampered with or taken.

m. On or about August 6, 2019, at approximately 9:04 a.m., the Sterling Fire Department responded to the subject home responding to a call regarding a natural gas leak at the residence. The fire department determined that the stove burner was turned on, causing the residence to fill with natural gas up to explosive levels which endangered nearby occupied structures. The fire department contacted Defendant at her hotel, and she responded to the subject home. Defendant later returned to her hotel at approximately 6:00 p.m.

n. On or about August 6, 2019, Defendant left the hotel in her vehicle at approximately 10:43 p.m. She exited the parking lot and headed west down Park Avenue West, then proceeded south on Milton Street past Seville Antiques. Defendant traveled toward the

location of her home on Spruce Street in Seville, Ohio where she remained between approximately 10:54 p.m. until 11:39 p.m. At approximately 11:43 p.m. Defendant travelled back to her hotel room, returning at approximately 11:52 p.m.

o. On or about August 7, 2019, at approximately 12:36 a.m., the Sterling Fire Department and Wayne County Sheriff's Office responded to the subject home in reference to a fire and explosion at the residence. A neighbor called Defendant ANGELA FRASE on her cell phone at 12:47 p.m. to notify her about the fire. Soon after the call, Defendant ANGELA FRASE and Person 1 left the hotel together and headed toward their home.

p. On or about August 7, 2019, the Ohio State Fire Marshall responded to the subject home and examined the scene. The Fire Marshall determined the cause of the fire to be incendiary in nature. The word "n***r" (sic) was spray painted on the detached garage along with a symbol that appeared to be a swastika also spray painted on the garage.

q. On or about August 7, 2019, Defendant reported to law enforcement that on August 6, 2019, she and Person 1 returned to their hotel at 5:30 p.m. or 6:00 p.m. and did not leave until they received a call from their neighbor at approximately 12:47 a.m. informing them that their home had exploded.

r. On or about August 11, 2019, Defendant ANGELA FRASE reported to law enforcement that she went to her house to check on the cats and to check on the motorcycle in the garage when she observed two suspicious subjects to the rear of her garage that took off running. A Sherriff's deputy responded to the subject home and discovered the word "white power" spray painted on the garage. A neighbor reported to police that he had not seen anything spray painted on the garage earlier in the day.

s. On August 14, 2019, Defendant called police and reported finding a stuffed doll in her mailbox that was painted black with a rope or noose tied around its neck.

t. On August 23, 2019, Defendant and Person 1 reported to law enforcement that they were walking around their property and located an envelope with four letters “G * * R” written on it. Inside the envelope there was a clear plastic bag with “DIE” written on it that contained an unknown white substance. Person 1 advised he would attempt to download photos from his surveillance camera and contact police. No surveillance photos were ever provided.


u. On or about March 10, 2020, Defendant and her husband signed a property proof of loss claiming the fire was caused by an “apparent explosion” of “origin unknown” with no witnesses.

10. On or about the dates listed below, in the Northern District of Ohio, Eastern Division, Defendant ANGELA FRASE, having devised and intended to devise any scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises, for the purpose of executing such scheme and artifice and attempting to do so, placed and caused to be placed in any post office and authorized depository for mail matter, any matter or thing, as described below, to be sent and delivered by the United States Postal Services, and deposited and caused to be deposited said matter or things to be sent and delivered by any private and commercial interstate carrier, and knowingly caused to be delivered by mail or such carrier said matter or thing, according to the directions thereon, including the following mailings, each representing a separate count of this Indictment:

Count	Approximate Date of Mailing	Description of Mailing	Sender	Recipient
1	11/1/2019	Check 0300228666 in the amount of \$2,500.00	"Insurance Company," Columbus, Ohio	Defendant and Person 1, Medina, Ohio
2	2/25/2020	Check 0300305093 in the amount of \$5,093.00	"Insurance Company," Columbus, Ohio	"Insurance Adjusting Company" and Defendant and Person 1, Lakewood, Ohio
3	6/16/2020	Check 0300381651 in the amount of \$10,800.00	"Insurance Company," Columbus, Ohio	"Law Firm" and "Insurance Adjusting Company" and Defendant and Person 1, Independence, Ohio
4	6/17/2020	Check 0300382385 in the amount of \$308,679.00	"Insurance Company," Columbus, Ohio	"Law Firm" and "Insurance Adjusting Company" and Defendant and Person 1, Independence, Ohio

All in violation of Title 18, United States Code, Section 1341.

REBECCA C. LUTZKO
United States Attorney

By: 
 Kelly L. Galvin, Chief
 Chief, General Crimes Unit