

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

MATTHEW QUEEN,

Defendant.

**SUPERSEDING INFORMATION**

S1 24 Cr. 291

**COUNT ONE**  
**(Falsification of Records)**

The United States Attorney charges:

Background

1. At all times relevant to this Information, MATTHEW QUEEN, the defendant, was employed by a seminary (the “Seminary”) affiliated with a national religious denomination (the “Denomination”) as a professor and the Interim Provost.

2. In or about 2022, the United States Attorney’s Office for the Southern District of New York (“the U.S. Attorney’s Office”) began investigating allegations of sexual abuse and misconduct related to the Denomination and its affiliated entities, and the alleged cover-up of such allegations by individuals associated with the Denomination and its affiliated entities. In or about October 2022, a grand jury subpoena was issued to the Seminary (the “Subpoena”) requiring the production of, among other things, all documents in the Seminary’s possession related to allegations of sexual abuse against anyone employed by or associated with the Seminary.

Obstruction of the Grand Jury Investigation

3. In or about November 2022, after the Seminary received the Subpoena, a Seminary employee (“Employee-1”) received a report regarding an allegation that a current Seminary student (the “Student”) had committed sexual abuse. Employee-1 immediately brought the

allegation against the Student to the attention of the Seminary's campus police. At that time, however, the Seminary took no further action regarding the allegation and did not report it to the U.S. Attorney's Office.

4. On or about January 25, 2023, Employee-1 created a document describing, among other things, the November 2022 allegation of sexual abuse involving the Student and the Seminary's failure to take action regarding the allegation at the time it was reported to Employee-1 (the "Document").

5. On or about January 26, 2023, a member of the Seminary's executive staff ("Employee-2") met with Employee-1 and MATTHEW QUEEN, the defendant. During the meeting, Employee-2 directed Employee-1 to destroy the Document. QUEEN was present during the conversation about the Document and heard Employee-2 direct Employee-1 to make the Document "go away."

#### QUEEN Provides False Information to Law Enforcement

6. On or about May 23, 2023, MATTHEW QUEEN, the defendant, met with the U.S. Attorney's Office and a law enforcement agent from the Federal Bureau of Investigation ("FBI") in Fort Worth, Texas. During that meeting, QUEEN falsely stated that on January 26, 2023, he had not heard Employee-2 direct Employee-1 to destroy the Document.

7. Three days later, on or about May 26, 2023, MATTHEW QUEEN, the defendant, told another Seminary employee ("Employee-3") that QUEEN had located a notebook in his office containing purportedly contemporaneous notes of the January 26, 2023 conversation mentioned above (the "Notes"). The Notes falsely stated that on January 26, Employee-2 and Employee-1 had discussed providing the Document to a different department at the Seminary, but omitted the fact that Employee-2 had directed Employee-1 to destroy the Document. QUEEN provided the

Notes to Employee-3 to produce in response to the Subpoena.

8. In or about June 2023, MATTHEW QUEEN, the defendant, caused a copy of the Notes to be provided to the U.S. Attorney's Office.

9. On or about June 20, 2023, MATTHEW QUEEN, the defendant, met again with the U.S. Attorney's Office and the FBI in Manhattan, New York and produced the original notebook containing the Notes. QUEEN initially falsely stated that he had written the Notes contemporaneously to the conversation he witnessed between Employee-1 and Employee-2 on January 26, 2023. QUEEN then falsely stated that he instead had written the Notes in or about April 2023. In truth and in fact, and as QUEEN well knew, he had not written the notes contemporaneously with the January 26, 2023 conversation and instead had written the Notes following his May 23, 2023 meeting with the U.S. Attorney's Office and the FBI.

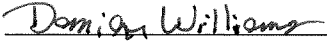
10. On or about June 21, 2023, MATTHEW QUEEN, the defendant, testified under oath that on January 26, 2023, he had in fact heard Employee-2 instruct Employee-1 to make the Document "go away."

### **STATUTORY ALLEGATION**

11. In or about June 2023, in the Southern District of New York and elsewhere, MATTHEW QUEEN, the defendant, knowingly altered, destroyed, mutilated, concealed, covered up, falsified, and made a false entry in a record, document, and tangible object with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of a department and agency of the United States, and in relation to and in contemplation of such a matter, to wit, QUEEN prepared and provided to the United States

Attorney's Office a false document, with the intent to impede, obstruct, and influence an investigation by the United States Attorney's Office.

(Title 18, United States Code, Section 1519.)

  
DAMIAN WILLIAMS  
United States Attorney