

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

MATTHEW QUEEN,

Defendant.

SEALED INDICTMENT

24 Cr.

24 CRIM 291

COUNT ONE  
(Falsification of Records)

The Grand Jury charges:

Background

1. At all times relevant to this Indictment, [REDACTED] (the "Seminary"), [REDACTED] was a theological seminary affiliated with [REDACTED]

2. At all times relevant to this Indictment, MATTHEW QUEEN, the defendant, was employed by the Seminary as a professor and the Interim Provost.

3. 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 [REDACTED] and its affiliated entities, and the alleged cover-up of such allegations by individuals associated with [REDACTED] and its affiliated entities. In or about October 2022, the U.S. Attorney's Office issued a grand jury subpoena 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 U.S. Attorney's Office's Grand Jury Investigation

4. 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 [REDACTED]. 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.

5. On or about January 25, 2023, Employee-1 created a document describing, among other things, the 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"). Based on the Document's content, production of the Document to the U.S. Attorney's Office was required by the Subpoena.

6. On or about January 26, 2023, [REDACTED] met with Employee-1 and MATTHEW QUEEN, the defendant. During the meeting, [REDACTED] directed Employee-1 to destroy the Document. QUEEN was present during the conversation about the Document and witnessed [REDACTED] direct Employee-1 to make the Document "go away."

QUEEN Falsifies Notes to Produce to the U.S. Attorney's Office

7. 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 [REDACTED] direct Employee-1 to destroy the Document.

8. On or about May 26, 2023, MATTHEW QUEEN, the defendant, falsely stated to another Seminary employee ("Employee-2") that QUEEN had located a notebook in his office containing purportedly contemporaneous notes of the January 26, 2023 conversation in which [REDACTED].

██████████ directed Employee-1 to destroy the Document (the “Notes”). The Notes falsely stated that on January 26, ██████████ and Employee-1 had merely discussed providing the Document to ██████████ and omitted the fact that ██████████ had directed Employee-1 to destroy the Document. Queen provided the Notes to Employee-2 in connection with the Subpoena.

9. In or about June 2023, MATTHEW QUEEN, the defendant, provided the U.S. Attorney’s Office with a copy of the Notes.

10. 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 ██████████ and the Employee on January 26, 2023. QUEEN then falsely stated that he instead had written the Notes in or about April 2023, when in fact he had written the Notes following his May 23, 2023 meeting with the U.S. Attorney’s Office and the FBI.

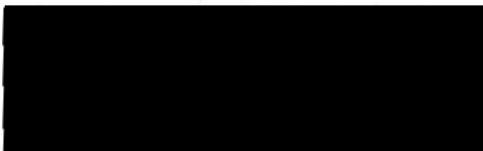
11. On or about June 21, 2023, MATTHEW QUEEN, the defendant, testified under oath that on January 26, 2023, he had in fact heard ██████████ instruct Employee-1 to make the Document “go away.”

**STATUTORY ALLEGATION**

12. 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.)



FOREPERSON

*Damian Williams*  
DAMIAN WILLIAMS  
United States Attorney