

UNITED STATES DISTRICT COURT

for the

District of Massachusetts

United States of America

v.

LONNIE SMITH-MATTHEWS

Case No.

25-mj-7245-JCB

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 25 and August 24, 2024 in the county of Suffolk in the
District of Massachusetts, the defendant(s) violated:

Code Section

18 U.S.C. § 641
 18 U.S.C. § 1344(1)

Offense Description

Theft of government funds
 Bank Fraud

This criminal complaint is based on these facts:

See Attached Affidavit of Special Agent Robert Quan.

☒ Continued on the attached sheet.*Complainant's signature*

Special Agent Robert Quan

Printed name and title

Subscribed and sworn to before me telephonically pursuant to Rule 4.1(a)

Date:

5:55 PM, Jun 4, 2025



City and state:

Boston, Massachusetts

*Judge's signature*

Hon. Jennifer C. Boal, U.S. Magistrate Judge

Printed name and title