

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA**

**v.**

**MATTHEW LOWRY**

**CRIMINAL NO.** \_\_\_\_\_

**DATE FILED:** \_\_\_\_\_

**VIOLATIONS:**

**18 U.S.C. § 1512(c)(2) (obstruction of justice – 20 counts)**

**18 U.S.C. § 1519 (obstruction of justice – 18 counts)**

**18 U.S.C. § 654 (conversion of property – 13 counts)**

**21 U.S.C. § 844(a) (possession of heroin – 13 counts)**

**INFORMATION**

**THE UNITED STATES ATTORNEY CHARGES THAT:**

At all times material to this information:

1. Defendant MATTHEW LOWRY was a Special Agent with the Federal Bureau of Investigation (“FBI”) assigned to the Washington, D.C. Field Office (“WFO”), where he was a member of the Cross-Border Task Force (“CBTF”).
2. The CBTF conducted investigations into narcotics trafficking and violent gang activity occurring in and around Washington D.C. and Prince George’s County, Maryland.
3. Defendant MATTHEW LOWRY knew that all contraband seized during an investigation was to be promptly turned into the WFO’s Evidence Control Center (“ECC”) or brought to a laboratory for testing.
4. Defendant MATTHEW LOWRY knew of his obligation to maintain accurate chain of custody records for every piece of evidence recovered during an investigation.

5. Defendant MATTHEW LOWRY knew that evidence checked into the ECC should be removed only when certain, authorized law enforcement reasons necessitated removal.

6. As an experienced federal agent, defendant MATTHEW LOWRY knew that tampering with evidence, including by stealing, destroying, and altering seized narcotics, could adversely impact the prosecution of individuals in connection with that evidence, including by rendering the evidence inadmissible at trial.

7. As a member of the CBTF, defendant MATTHEW LOWRY participated in several large-scale investigations that resulted in numerous seizures of significant quantities of narcotics, including heroin. Those investigations include the following:

a. Investigation #1: Beginning in or around January 2013, the FBI initiated an investigation into the criminal activities of a large-scale drug trafficking organization that was receiving kilogram quantities of heroin and cocaine from co-conspirators located in California, and re-distributing the drugs in and around Washington, D.C. The investigation included numerous court-authorized wiretaps of targets located both in Washington, D.C. and California, substantial physical surveillance, numerous controlled drug purchases, seizures of substantial quantities of cocaine and heroin, and the execution of 29 search warrants in the Washington, D.C. area. On November 20, 2013, a grand jury returned an indictment charging 13 defendants with conspiracy to distribute and to possess with the intent to distribute one or more kilograms of heroin and five or more kilograms of cocaine. On June 4, 2014, a grand jury returned a superseding indictment naming one additional defendant and adding money laundering charges against the lead defendant. Ultimately, defendant MATTHEW LOWRY's misconduct as set forth in this information resulted in the dismissal of all charges against all of the defendants.

b. Investigation #2: Beginning in or around July 2011, the FBI initiated an investigation into a New York-based narcotics trafficker who was providing kilogram quantities of heroin to drug traffickers located in the Washington, D.C. area. The investigation included numerous court-authorized wiretaps of targets located both in Washington, D.C. and New York, substantial physical surveillance, numerous controlled drug purchases, and several car stops resulting in seizures of hundreds of grams of heroin. On December 13, 2012, a grand jury returned an indictment charging 15 defendants with conspiracy to distribute and possess with intent to distribute one kilogram or more of heroin. During the subsequent execution of search warrants at 15 locations in Washington, D.C., Virginia, and Maryland, law enforcement officials recovered a significant quantity of heroin, crack cocaine, three firearms (one of which was loaded), more than \$5,000 in cash, and an assortment of drug paraphernalia used to store, package, and distribute heroin. Ultimately, defendant MATTHEW LOWRY's misconduct as set forth in this information resulted in the dismissal of all charges against 12 of the defendants.

c. Investigation #3: Beginning in or around November 2011, the FBI initiated an investigation of a Washington, D.C.-based narcotics trafficker who was providing kilogram quantities of heroin to drug traffickers in the Washington, D.C. area. The investigation included numerous court-authorized wiretaps, substantial physical surveillance, numerous controlled drug purchases, and the execution of search warrants at multiple residences, in which law enforcement officials recovered a .38 caliber revolver, a Glock handgun, ammunition, a heroin cutting agent, one digital scale, drug packaging material, and approximately \$9,000 in cash. On November 6, 2012, a grand jury returned an indictment charging five defendants with conspiracy to distribute and possess with intent to distribute 100 grams or more of heroin. Subsequently, one of those defendants was also charged with carrying and possessing a firearm during a drug

trafficking crime. Ultimately, all five defendants entered guilty pleas. As of the filing of this information, four defendants have been sentenced, to periods of incarceration of 60 months, 57 months, 30 months, and 18 months, respectively. Each of the four sentenced defendants has since filed a motion challenging his conviction, arguing, in part, that the conviction should be vacated as a result of defendant MATTHEW LOWRY's misconduct.

d. Investigation #4: Beginning in or around June 2014, the FBI and Drug Enforcement Administration ("DEA") initiated an investigation of two individuals who led a violent heroin distribution organization that operated in the Washington, D.C. area. Between June and September 2014, law enforcement officials conducted substantial physical surveillance and made numerous controlled purchases of heroin. As the investigation proceeded, law enforcement officials identified approximately 15 to 20 targets, and developed evidence with an eye towards obtaining a court-authorized wiretap on one or more of the targets. However, defendant MATTHEW LOWRY's misconduct as set forth in this information resulted in the investigation being closed and no charges filed.

e. Investigation #5: Beginning in or around August 2014, the FBI initiated an investigation of a heroin trafficking organization operating in the areas of Washington, D.C. and Prince George's Count, Maryland. In August and September 2014, law enforcement officials conducted substantial physical surveillance and made numerous controlled purchases of heroin. As the investigation proceeded, law enforcement officials identified approximately five to 10 targets, and developed evidence with an eye towards obtaining a court-authorized wiretap on one or more of the targets. However, defendant MATTHEW LOWRY's misconduct as set forth in this information resulted in the investigation being closed and no charges filed.

8. Defendant MATTHEW LOWRY tampered with evidence seized during the above-referenced investigations in the following ways:

a. In several instances, defendant LOWRY went to the ECC and removed seized heroin from evidence, writing on a chain of custody record a false explanation for his taking of the evidence. Over a period of several weeks or months, defendant LOWRY kept the heroin in his car and periodically ingested it. Before returning the heroin to the ECC or bringing it to a laboratory for testing, defendant LOWRY (1) added to the heroin a measured amount of a cutting agent, either the supplement Creatine or the laxative Purelax, in order to account for the weight discrepancy resulting from his illegal usage; (2) placed the altered heroin into a new evidence bag, on which he placed a new sticker signifying that the evidence bag had been sealed; (3) copied the content written on the original sealing sticker to the new sealing sticker, forging the names or signatures of FBI agents who purportedly witnessed his sealing of the evidence; (4) peeled off a barcode sticker from the original evidence bag and applied it to the new bag; and (5) disposed of the original evidence bag and sealing sticker.

b. Defendant LOWRY participated in many undercover, controlled purchases of heroin from targets in his investigations. Following several of these transactions, defendant LOWRY, rather than check the heroin into evidence as required, kept the heroin in his car for a period of several weeks or months, during which he periodically ingested it. Before checking the heroin into the ECC, defendant LOWRY (1) added a cutting agent to account for the weight discrepancy resulting from his ingesting the heroin; (2) placed sealing stickers on evidence bags and filled out all requested information except for the seizure and sealing dates, which he left blank; (3) requested that another agent, who had no knowledge of defendant LOWRY's improper motives, sign as the witnessing official the undated sealing stickers; and (4) wrote on the sealing

stickers the accurate date on which the drugs were seized but falsely indicated that the evidence was sealed that same day.

c. On one occasion, defendant LOWRY participated in an undercover, controlled purchase of heroin from a target of Investigation #5, and in lieu of turning the heroin into evidence and documenting its seizure, defendant LOWRY ingested the heroin and never turned it into evidence.

9. From on or about July 11, 2013 through on or about July 19, 2013, in the District of Columbia, defendant

**MATTHEW LOWRY**

corruptly obstructed, influenced, and impeded Investigation #1, an official proceeding, by knowingly tampering with evidence, that is, approximately 20.1 grams of heroin.

In violation of Title 18, United States Code, Section 1512(c)(2).

**COUNT TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about July 26, 2013 through on or about September 5, 2013, in the

District of Columbia, defendant

**MATTHEW LOWRY**

corruptly obstructed, influenced, and impeded Investigation #3, an official proceeding, by knowingly tampering with evidence, that is, approximately 13.3 grams of heroin.

In violation of Title 18, United States Code, Section 1512(c)(2).

**COUNT THREE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about August 5, 2013 through on or about June 30, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

corruptly obstructed, influenced, and impeded Investigation #1, an official proceeding, by knowingly tampering with evidence, that is, approximately 21.3 grams of heroin.

In violation of Title 18, United States Code, Section 1512(c)(2).



**COUNT FOUR**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about September 5, 2013 through on or about June 30, 2014, in the

District of Columbia, defendant

**MATTHEW LOWRY**

corruptly obstructed, influenced, and impeded Investigation #1, an official proceeding, by knowingly tampering with evidence, that is, approximately 428.2 grams of heroin.

In violation of Title 18, United States Code, Section 1512(c)(2).

**COUNT FIVE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about January 8, 2014 through on or about June 30, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

corruptly obstructed, influenced, and impeded Investigation #1, an official proceeding, by knowingly tampering with evidence, that is, approximately 775 grams of heroin.

In violation of Title 18, United States Code, Section 1512(c)(2).

**COUNT SIX**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about July 11, 2014 through on or about September 11, 2014, in the

District of Columbia, defendant

**MATTHEW LOWRY**

corruptly obstructed, influenced, and impeded Investigation #1, an official proceeding, by knowingly tampering with evidence, that is, approximately 7 grams of heroin.

In violation of Title 18, United States Code, Section 1512(c)(2).

**COUNT SEVEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about July 11, 2014 through on or about September 11, 2014, in the

District of Columbia, defendant

**MATTHEW LOWRY**

corruptly obstructed, influenced, and impeded Investigation #5, an official proceeding, by knowingly tampering with evidence, that is, approximately 4.83 grams of heroin.

In violation of Title 18, United States Code, Section 1512(c)(2).

**COUNT EIGHT**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about July 22, 2014 through on or about September 11, 2014, in the

District of Columbia, defendant

**MATTHEW LOWRY**

corruptly obstructed, influenced, and impeded Investigation #1, an official proceeding, by knowingly tampering with evidence, that is, approximately 5 grams of heroin.

In violation of Title 18, United States Code, Section 1512(c)(2).

**COUNT NINE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.

2. From on or about July 31, 2014 through on or about September 11, 2014, in the

District of Columbia, defendant

**MATTHEW LOWRY**

corruptly obstructed, influenced, and impeded Investigation #4, an official proceeding, by knowingly tampering with evidence, that is, approximately 10 grams of heroin.

In violation of Title 18, United States Code, Section 1512(c)(2).

**COUNT TEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about August 5, 2014 through on or about September 11, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

corruptly obstructed, influenced, and impeded Investigation #4, an official proceeding, by knowingly tampering with evidence, that is, approximately 15 grams of heroin.

In violation of Title 18, United States Code, Section 1512(c)(2).

**COUNT ELEVEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about August 14, 2014 through on or about September 11, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

corruptly obstructed, influenced, and impeded Investigation #5, an official proceeding, by knowingly tampering with evidence, that is, approximately 2.85 grams of heroin.

In violation of Title 18, United States Code, Section 1512(c)(2).



**COUNT TWELVE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about August 15, 2014 through on or about September 11, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

corruptly obstructed, influenced, and impeded Investigation #4, an official proceeding, by knowingly tampering with evidence, that is, approximately 15 grams of heroin.

In violation of Title 18, United States Code, Section 1512(c)(2).

**COUNT THIRTEEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about August 25, 2014 through on or about September 29, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

corruptly obstructed, influenced, and impeded Investigation #1, an official proceeding, by knowingly tampering with evidence, that is, heroin, which combined with its packaging weighs approximately 44 grams.

In violation of Title 18, United States Code, Section 1512(c)(2).

**COUNT FOURTEEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about August 29, 2014 through on or about September 11, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

corruptly obstructed, influenced, and impeded Investigation #4, an official proceeding, by knowingly tampering with evidence, that is, approximately 15 grams of heroin.

In violation of Title 18, United States Code, Section 1512(c)(2).

**COUNT FIFTEEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. On or about September 4, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

corruptly obstructed, influenced, and impeded Investigation #5, an official proceeding, by knowingly tampering with evidence, that is, approximately 8.1 grams of heroin.

In violation of Title 18, United States Code, Section 1512(c)(2).

**COUNT SIXTEEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about September 3, 2014 through on or about September 29, 2014,

in the District of Columbia, defendant

**MATTHEW LOWRY**

corruptly obstructed, influenced, and impeded Investigation #1, an official proceeding, by knowingly tampering with evidence, that is, heroin, which combined with its packaging weighs approximately 62.3 grams.

In violation of Title 18, United States Code, Section 1512(c)(2).

**COUNT SEVENTEEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.

2. From on or about September 9, 2014 through on or about September 11, 2014,

in the District of Columbia, defendant

**MATTHEW LOWRY**

corruptly obstructed, influenced, and impeded Investigation #1, an official proceeding, by knowingly tampering with evidence, that is, approximately 25.8 grams of heroin.

In violation of Title 18, United States Code, Section 1512(c)(2).

**COUNT EIGHTEEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about September 15, 2014 through on or about September 29, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

corruptly obstructed, influenced, and impeded Investigation #2, an official proceeding, by knowingly tampering with evidence, that is, approximately 27.3 grams of heroin.

In violation of Title 18, United States Code, Section 1512(c)(2).

**COUNT NINETEEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. On or about September 29, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

d corruptly obstructed, influenced, and impeded Investigation #1, an official proceeding, by knowingly tampering with evidence, that is, heroin, which combined with its packaging weighs approximately 27.2 grams.

In violation of Title 18, United States Code, Section 1512(c)(2).



**COUNT TWENTY**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. On or about September 29, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

corruptly obstructed, influenced, and impeded Investigation #2, an official proceeding, by knowingly tampering with evidence, that is, approximately 290.6 grams of heroin.

In violation of Title 18, United States Code, Section 1512(c)(2).

**COUNT TWENTY-ONE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.

2. From on or about July 11, 2013 through on or about July 19, 2013, in the

District of Columbia, defendant

**MATTHEW LOWRY**

knowingly altered, destroyed, concealed, covered up, falsified, and made a false entry in records, documents, and tangible objects, that is, approximately 20.1 grams of heroin and the chain of custody records pertaining thereto, with the intent to impede, obstruct, and influence the investigation and proper administration of Investigation #1, a matter within the jurisdiction of the Federal Bureau of Investigation, which is an agency of the United States.

In violation of Title 18, United States Code, Section 1519.

**COUNT TWENTY-TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.

2. From on or about July 26, 2013 through on or about September 5, 2013, in the

District of Columbia, defendant

**MATTHEW LOWRY**

knowingly altered, destroyed, concealed, covered up, falsified, and made a false entry in records, documents, and tangible objects, that is, approximately 13.3 grams of heroin and the chain of custody records pertaining thereto, with the intent to impede, obstruct, and influence the investigation and proper administration of Investigation #3, a matter within the jurisdiction of the Federal Bureau of Investigation, which is an agency of the United States.

In violation of Title 18, United States Code, Section 1519.

**COUNT TWENTY-THREE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about August 5, 2013 through on or about June 30, 2014, in the

District of Columbia, defendant

**MATTHEW LOWRY**

knowingly altered, destroyed, concealed, covered up, falsified, and made a false entry in records, documents, and tangible objects, that is, approximately 21.3 grams of heroin and the chain of custody records pertaining thereto, with the intent to impede, obstruct, and influence the investigation and proper administration of Investigation #1, a matter within the jurisdiction of the Federal Bureau of Investigation, which is an agency of the United States.

In violation of Title 18, United States Code, Section 1519.

**COUNT TWENTY-FOUR**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.

2. From on or about September 5, 2013 through on or about June 30, 2014, in the

District of Columbia, defendant

**MATTHEW LOWRY**

knowingly altered, destroyed, concealed, covered up, falsified, and made a false entry in records, documents, and tangible objects, that is, approximately 428.2 grams of heroin and the chain of custody records pertaining thereto, with the intent to impede, obstruct, and influence the investigation and proper administration of Investigation #1, a matter within the jurisdiction of the Federal Bureau of Investigation, which is an agency of the United States.

In violation of Title 18, United States Code, Section 1519.

**COUNT TWENTY-FIVE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.

2. From on or about January 8, 2014 through on or about June 30, 2014, in the

District of Columbia, defendant

**MATTHEW LOWRY**

knowingly altered, destroyed, concealed, covered up, falsified, and made a false entry in records, documents, and tangible objects, that is, approximately 775 grams of heroin and the chain of custody records pertaining thereto, with the intent to impede, obstruct, and influence the investigation and proper administration of Investigation #1, a matter within the jurisdiction of the Federal Bureau of Investigation, which is an agency of the United States.

In violation of Title 18, United States Code, Section 1519.

**COUNT TWENTY-SIX**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about July 11, 2014 through on or about September 11, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly altered, destroyed, concealed, covered up, falsified, and made a false entry in records, documents, and tangible objects, that is, approximately 7 grams of heroin and the chain of custody records pertaining thereto, with the intent to impede, obstruct, and influence the investigation and proper administration of Investigation #1, a matter within the jurisdiction of the Federal Bureau of Investigation, which is an agency of the United States.

In violation of Title 18, United States Code, Section 1519.

**COUNT TWENTY-SEVEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about July 11, 2014 through on or about September 11, 2014, in the

District of Columbia, defendant

**MATTHEW LOWRY**

knowingly altered, destroyed, concealed, covered up, falsified, and made a false entry in records, documents, and tangible objects, that is, approximately 4.83 grams of heroin and the chain of custody records pertaining thereto, with the intent to impede, obstruct, and influence the investigation and proper administration of Investigation #5, a matter within the jurisdiction of the Federal Bureau of Investigation, which is an agency of the United States.

In violation of Title 18, United States Code, Section 1519.



**COUNT TWENTY-EIGHT**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.

2. From on or about July 22, 2014 through on or about September 11, 2014, in the

District of Columbia, defendant

**MATTHEW LOWRY**

knowingly altered, destroyed, concealed, covered up, falsified, and made a false entry in records, documents, and tangible objects, that is, approximately 5 grams of heroin and the chain of custody records pertaining thereto, with the intent to impede, obstruct, and influence the investigation and proper administration of Investigation #1, a matter within the jurisdiction of the Federal Bureau of Investigation, which is an agency of the United States.

In violation of Title 18, United States Code, Section 1519.

**COUNT TWENTY-NINE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.

2. From on or about July 31, 2014 through on or about September 11, 2014, in the

District of Columbia, defendant

**MATTHEW LOWRY**

knowingly altered, destroyed, concealed, covered up, falsified, and made a false entry in records, documents, and tangible objects, that is, approximately 10 grams of heroin and the chain of custody records pertaining thereto, with the intent to impede, obstruct, and influence the investigation and proper administration of Investigation #4, a matter within the jurisdiction of the Federal Bureau of Investigation, which is an agency of the United States.

In violation of Title 18, United States Code, Section 1519.

**COUNT THIRTY**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about August 5, 2014 through on or about September 11, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly altered, destroyed, concealed, covered up, falsified, and made a false entry in records, documents, and tangible objects, that is, approximately 15 grams of heroin and the chain of custody records pertaining thereto, with the intent to impede, obstruct, and influence the investigation and proper administration of Investigation #4, a matter within the jurisdiction of the Federal Bureau of Investigation, which is an agency of the United States.

In violation of Title 18, United States Code, Section 1519.

**COUNT THIRTY-ONE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about August 14, 2014 through on or about September 11, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly altered, destroyed, concealed, covered up, falsified, and made a false entry in records, documents, and tangible objects, that is, approximately 2.85 grams of heroin and the chain of custody records pertaining thereto, with the intent to impede, obstruct, and influence the investigation and proper administration of Investigation #5, a matter within the jurisdiction of the Federal Bureau of Investigation, which is an agency of the United States.

In violation of Title 18, United States Code, Section 1519.

**COUNT THIRTY-TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about August 15, 2014 through on or about September 11, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly altered, destroyed, concealed, covered up, falsified, and made a false entry in records, documents, and tangible objects, that is, approximately 15 grams of heroin and the chain of custody records pertaining thereto, with the intent to impede, obstruct, and influence the investigation and proper administration of Investigation #4, a matter within the jurisdiction of the Federal Bureau of Investigation, which is an agency of the United States.

In violation of Title 18, United States Code, Section 1519.

**COUNT THIRTY-THREE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about August 25, 2014 through on or about September 29, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly altered, destroyed, concealed, covered up, falsified, and made a false entry in records, documents, and tangible objects, that is, heroin, which combined with its packaging weighs approximately 44 grams, and the chain of custody records pertaining thereto, with the intent to impede, obstruct, and influence the investigation and proper administration of Investigation #1, a matter within the jurisdiction of the Federal Bureau of Investigation, which is an agency of the United States.

In violation of Title 18, United States Code, Section 1519.

**COUNT THIRTY-FOUR**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about August 29, 2014 through on or about September 11, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly altered, destroyed, concealed, covered up, falsified, and made a false entry in records, documents, and tangible objects, that is, approximately 15 grams of heroin and the chain of custody records pertaining thereto, with the intent to impede, obstruct, and influence the investigation and proper administration of Investigation #4, a matter within the jurisdiction of the Federal Bureau of Investigation, which is an agency of the United States.

In violation of Title 18, United States Code, Section 1519.

**COUNT THIRTY-FIVE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.

2. From on or about September 3, 2014 through on or about September 29, 2014,

in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly altered, destroyed, concealed, covered up, falsified, and made a false entry in records, documents, and tangible objects, that is, heroin, which combined with its packaging weighs approximately 62.3 grams, and the chain of custody records pertaining thereto, with the intent to impede, obstruct, and influence the investigation and proper administration of Investigation #1, a matter within the jurisdiction of the Federal Bureau of Investigation, which is an agency of the United States.

In violation of Title 18, United States Code, Section 1519.



**COUNT THIRTY-SIX**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about September 15, 2014 through on or about September 29, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly altered, destroyed, concealed, covered up, falsified, and made a false entry in records, documents, and tangible objects, that is, approximately 27.3 grams of heroin and the chain of custody records pertaining thereto, with the intent to impede, obstruct, and influence the investigation and proper administration of Investigation #2, a matter within the jurisdiction of the Federal Bureau of Investigation, which is an agency of the United States.

In violation of Title 18, United States Code, Section 1519.

**COUNT THIRTY-SEVEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. On or about September 29, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly altered, destroyed, concealed, covered up, falsified, and made a false entry in records, documents, and tangible objects, that is, heroin, which combined with its packaging weighs approximately 27.2 grams, and the chain of custody records pertaining thereto, with the intent to impede, obstruct, and influence the investigation and proper administration of Investigation #1, a matter within the jurisdiction of the Federal Bureau of Investigation, which is an agency of the United States.

In violation of Title 18, United States Code, Section 1519.

**COUNT THIRTY-EIGHT**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. On or about September 29, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly falsified and made a false entry in records, documents, and tangible objects, that is, the chain of custody records pertaining to approximately 290.6 grams of heroin, with the intent to impede, obstruct, and influence the investigation and proper administration of Investigation #2, a matter within the jurisdiction of the Federal Bureau of Investigation, which is an agency of the United States.

In violation of Title 18, United States Code, Section 1519.

**COUNT THIRTY-NINE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. On or about July 11, 2013, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and wrongfully converted to his own use the property of another, that is, approximately 20.1 grams of heroin, the value of which was greater than \$1,000, which came into his possession and under his control in the execution of his employment with the Federal Bureau of Investigation, an agency of the United States.

In violation of Title 18, United States Code, Section 654.

**COUNT FORTY**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. On or about July 26, 2013, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and wrongfully converted to his own use the property of another, that is, approximately 13.3 grams of heroin, the value of which was greater than \$1,000, which came into his possession and under his control in the execution of his employment with the Federal Bureau of Investigation, an agency of the United States.

In violation of Title 18, United States Code, Section 654.

**COUNT FORTY-ONE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. On or about August 5, 2013, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and wrongfully converted to his own use the property of another, that is, approximately 21.3 grams of heroin, the value of which was greater than \$1,000, which came into his possession and under his control in the execution of his employment with the Federal Bureau of Investigation, an agency of the United States.

In violation of Title 18, United States Code, Section 654.

**COUNT FORTY-TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. On or about August 12, 2013, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and wrongfully converted to his own use the property of another, that is, approximately 18.9 grams of heroin, the value of which was greater than \$1,000, which came into his possession and under his control in the execution of his employment with the Federal Bureau of Investigation, an agency of the United States.

In violation of Title 18, United States Code, Section 654.

**COUNT FORTY-THREE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. On or about September 5, 2013, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and wrongfully converted to his own use the property of another, that is, approximately 428.2 grams of heroin, the value of which was greater than \$1,000, which came into his possession and under his control in the execution of his employment with the Federal Bureau of Investigation, an agency of the United States.

In violation of Title 18, United States Code, Section 654.



**COUNT FORTY-FOUR**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. On or about January 8, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and wrongfully converted to his own use the property of another, that is, approximately 775 grams of heroin, the value of which was greater than \$1,000, which came into his possession and under his control in the execution of his employment with the Federal Bureau of Investigation, an agency of the United States.

In violation of Title 18, United States Code, Section 654.

**COUNT FORTY-FIVE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. On or about July 31, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and wrongfully converted to his own use the property of another, that is, approximately 10 grams of heroin, the value of which was greater than \$1,000, which came into his possession and under his control in the execution of his employment with the Federal Bureau of Investigation, an agency of the United States.

In violation of Title 18, United States Code, Section 654.

**COUNT FORTY-SIX**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. On or about August 5, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and wrongfully converted to his own use the property of another, that is, approximately 15 grams of heroin, the value of which was greater than \$1,000, which came into his possession and under his control in the execution of his employment with the Federal Bureau of Investigation, an agency of the United States.

In violation of Title 18, United States Code, Section 654.

**COUNT FORTY-SEVEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. On or about August 15, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and wrongfully converted to his own use the property of another, that is, approximately 15 grams of heroin, the value of which was greater than \$1,000, which came into his possession and under his control in the execution of his employment with the Federal Bureau of Investigation, an agency of the United States.

In violation of Title 18, United States Code, Section 654.

**COUNT FORTY-EIGHT**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. On or about August 29, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and wrongfully converted to his own use the property of another, that is, approximately 15 grams of heroin, the value of which was greater than \$1,000, which came into his possession and under his control in the execution of his employment with the Federal Bureau of Investigation, an agency of the United States.

In violation of Title 18, United States Code, Section 654.

**COUNT FORTY-NINE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. On or about September 9, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and wrongfully converted to his own use the property of another, that is, approximately 25.8 grams of heroin, the value of which was greater than \$1,000, which came into his possession and under his control in the execution of his employment with the Federal Bureau of Investigation, an agency of the United States.

In violation of Title 18, United States Code, Section 654.

**COUNT FIFTY**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. On or about September 15, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and wrongfully converted to his own use the property of another, that is, approximately 27.3 grams of heroin, the value of which was greater than \$1,000, which came into his possession and under his control in the execution of his employment with the Federal Bureau of Investigation, an agency of the United States.

In violation of Title 18, United States Code, Section 654.

**COUNT FIFTY-ONE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. On or about September 29, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and wrongfully converted to his own use the property of another, that is, approximately 290.6 grams of heroin, the value of which was greater than \$1,000, which came into his possession and under his control in the execution of his employment with the Federal Bureau of Investigation, an agency of the United States.

In violation of Title 18, United States Code, Section 654.



**COUNT FIFTY-TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about July 11, 2013 through or about July 19, 2013, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and intentionally possessed approximately 20.1 grams of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 844(a).

**COUNT FIFTY-THREE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about July 26, 2013 through or about September 5, 2013, in the

District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and intentionally possessed approximately 13.3 grams of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 844(a).

**COUNT FIFTY-FOUR**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about August 5, 2013 through or about June 30, 2014, in the

District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and intentionally possessed approximately 21.3 grams of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 844(a).

**COUNT FIFTY-FIVE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about August 12, 2013 through or about September 5, 2013, in the

District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and intentionally possessed approximately 18.9 grams of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 844(a).

**COUNT FIFTY-SIX**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about September 5, 2013 through or about June 30, 2014, in the

District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and intentionally possessed approximately 428.2 grams of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 844(a).

**COUNT FIFTY-SEVEN**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about January 8, 2014 through or about June 30, 2014, in the

District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and intentionally possessed approximately 775 grams of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 844(a).

**COUNT FIFTY-EIGHT**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.

2. From on or about July 31, 2014 through or about September 11, 2014, in the

District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and intentionally possessed approximately 10 grams of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 844(a).

**COUNT FIFTY-NINE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about August 5, 2014 through or about September 11, 2014, in the

District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and intentionally possessed approximately 15 grams of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 844(a).



**COUNT SIXTY**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about August 15, 2014 through or about September 11, 2014, in the

District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and intentionally possessed approximately 15 grams of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 844(a).

**COUNT SIXTY-ONE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about August 29, 2014 through on or about September 11, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and intentionally possessed approximately 15 grams of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 844(a).

**COUNT SIXTY-TWO**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about September 9, 2014 through or about September 11, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and intentionally possessed approximately 25.8 grams of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 844(a).

**COUNT SIXTY-THREE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. From on or about September 15, 2014 through or about September 29, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and intentionally possessed approximately 27.3 grams of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 844(a).

**COUNT SIXTY-FOUR**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 8 of Count One are realleged and incorporated here.
2. On or about September 29, 2014, in the District of Columbia, defendant

**MATTHEW LOWRY**

knowingly and intentionally possessed approximately 290.6 grams of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 844(a).

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**ZANE DAVID MEMEGER  
UNITED STATES ATTORNEY**