

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

Criminal Case No. 25-cr-194-JLK

UNITED STATES OF AMERICA,

Plaintiff,

v.

MOHAMED SABRY SOLIMAN,

Defendant.

INDICTMENT

The Grand Jury charges:

INTRODUCTION

1. A group called “Run for Their Lives” scheduled a walk on June 1, 2025, at the Pearl Street Mall in Boulder, Colorado to call attention to hostages held in Gaza since October 7, 2023.

2. On June 1, 2025, Run for Their Lives participants walked along the Pearl Street Mall, and carried items including an Israeli flag, American flags, and flyers depicting some of the hostages. The Run for Their Lives participants stopped in the park in front of the Boulder County Courthouse, where other people were also gathered.

3. On June 1, 2025, the defendant, MOHAMED SABRY SOLIMAN, entered the park in front of the Boulder County Courthouse wearing a hazard vest and carrying a

backpack weed sprayer that contained a flammable liquid, and a black plastic container that contained at least eighteen glass wine carafe bottles and Ball jars, all of which contained a flammable liquid and several had red rags stuffed through the top to act as wicks (commonly referred to as “Molotov cocktails”).

4. At approximately 1:30 p.m. on June 1, 2025, the defendant, MOHAMED SABRY SOLIMAN, approached the Run for Their Lives participants gathered in front of the Boulder County Courthouse and threw two Molotov cocktails that he had ignited into the crowd.

5. When throwing one of the Molotov cocktails, the defendant, MOHAMED SABRY SOLIMAN, shouted, “Free Palestine!”

6. In response to several 911 calls, officers with the Boulder Police Department responded to the scene, and detained the defendant, MOHAMED SABRY SOLIMAN.

7. A handwritten document was recovered from the vehicle driven by the defendant, MOHAMED SABRY SOLIMAN, and included the following statements: “Zionism is our enemies untill [sic] Jerusalem is liberated and they are expelled from our land,” and further described Israel as a “cancer entity.”

8. During an interview with law enforcement, the defendant, MOHAMED SABRY SOLIMAN, stated, among other things, that he viewed “anyone supporting the exist [sic] of Israel on our land” to be “Zionist.” The defendant, MOHAMED SABRY SOLIMAN, stated that he “decide[d] to take [his] revenge from these people” and “search[ed] the internet looking for any Zionist event.” The defendant stated that he

learned of the Run for Their Lives walk through internet searches for “Zionist” events and that he identified the “Zionist” group when he saw the flags and signs they carried at the Boulder County Courthouse.

9. The defendant, MOHAMED SABRY SOLIMAN, stated that he hoped he had “...burned [sic] them all. I killed [sic] them all. This was my dream.”

COUNTS ONE THROUGH EIGHT

10. Paragraphs 1 through 9 previously alleged in this Indictment are re-alleged and incorporated as though fully set forth herein.

11. On or about June 1, 2025, in the State and District of Colorado, the defendant, MOHAMED SABRY SOLIMAN, willfully caused bodily injury to the victims listed below because of the actual and perceived national origin of any person:

Count	Victim
Count 1	Victim A
Count 2	Victim B
Count 3	Victim C
Count 4	Victim D
Count 5	Victim E
Count 6	Victim F
Count 7	Victim G
Count 8	Victim H

12. In connection with each of the offenses in Counts One through Eight, the conduct occurred during the course of, and as a result of, the travel of the defendant using a channel, facility, and instrumentality of interstate and foreign commerce; the defendant, MOHAMED SABRY SOLIMAN, used channels, facilities, and instrumentalities of interstate and foreign commerce; the defendant, MOHAMED SABRY SOLIMAN, employed an explosive and incendiary device that contained components that traveled in interstate and foreign commerce; and the conduct of the defendant, MOHAMED SABRY SOLIMAN, otherwise affected interstate and foreign commerce.

13. Each of the offenses charged in Counts One through Eight included an attempt to kill.

All in violation of Title 18, United States Code, Section 249(a)(2)(A)(ii)(II), (B)(i)(II), (B)(ii), (B)(iii), and (B)(iv)(II).

COUNT NINE

14. Paragraphs 1 through 9 previously alleged in this Indictment are re-alleged and incorporated as though fully set forth herein.

15. On or about June 1, 2025, in the State and District of Colorado, the defendant, MOHAMED SABRY SOLIMAN, through the use of fire, a dangerous weapon, and an explosive and an incendiary device, willfully attempted to cause bodily injury to members of the Run for Their Lives group and others, excluding Victims A through H, who had gathered in the park in front of the Boulder County Courthouse at the time of the offense, because of the actual and perceived national origin of any person.

16. In connection with the offense in Count Nine, the conduct occurred during the course of, and as a result of, the travel of the defendant, MOHAMED SABRY SOLIMAN, using a channel, facility, and instrumentality of interstate and foreign commerce; the defendant, MOHAMED SABRY SOLIMAN, used channels, facilities, and instrumentalities of interstate and foreign commerce; the defendant, MOHAMED SABRY SOLIMAN, employed an explosive and incendiary device that contained components that traveled in interstate and foreign commerce; and the conduct of the defendant, MOHAMED SABRY SOLIMAN, otherwise affected interstate and foreign commerce.

17. The offense charged in Count Nine included an attempt to kill.

All in violation of Title 18, United States Code, Section 249(a)(2)(A)(ii)(II), (B)(i)(II), (B)(ii), (B)(iii), and (B)(iv)(II).

COUNT TEN

18. Paragraphs 1 through 9 previously alleged in this Indictment are re-alleged and incorporated as though fully set forth herein.

19. On or about June 1, 2025, in the State and District of Colorado, the defendant, MOHAMED SABRY SOLIMAN, when he threw the first Molotov cocktail, knowingly used fire and an explosive to commit a felony which may be prosecuted in a court of the United States, namely, the violation of Title 18, United States Code, Section 249(a)(2), as charged in Counts One through Nine of this Indictment.

All in violation of Title 18, United States Code, Section 844(h)(1).

COUNT ELEVEN

20. Paragraphs 1 through 9 previously alleged in this Indictment are re-alleged and incorporated as though fully set forth herein.

21. On or about June 1, 2025, in the State and District of Colorado, the defendant, MOHAMED SABRY SOLIMAN, when he threw the second Molotov cocktail, knowingly used fire and an explosive to commit a felony which may be prosecuted in a court of the United States, namely, the violation of Title 18, United States Code, Section 249(a)(2), as charged in Counts One through Nine of this Indictment.

All in violation of Title 18, United States Code, Section 844(h)(1).

COUNT TWELVE

22. Paragraphs 1 through 9 previously alleged in this Indictment are re-alleged and incorporated as though fully set forth herein.

23. On or about June 1, 2025, in the State and District of Colorado, the defendant, MOHAMED SABRY SOLIMAN, knowingly carried an explosive during the commission of a felony which may be prosecuted in a court of the United States, namely, the violation of Title 18, United States Code, Section 249(a)(2), as charged in Counts One through Nine of this Indictment.

All in violation of Title 18, United States Code, Section 844(h)(2).

FORFEITURE ALLEGATION

24. The allegations contained in Counts Ten, Eleven, and Twelve of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. § 982(a)(2)(B) and 28 U.S.C. § 2461(c).

25. Upon conviction of the violation alleged in Counts Ten, Eleven, and Twelve of the Indictment involving violations of Title 18, United States Code, Sections 844(h)(1),(2), defendant MOHAMED SABRY SOLIMAN shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(B), and Title 28, United States Code, Section 2461(c), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations, and pursuant to Title 18, United States Code, Section 844(c) and Title 28, United States Code, Section 2461(c), any explosive materials involved or used or intended to be used in the violations.

26. If any of the property described above, as a result of any act or omission of the defendant:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third party;
- c) has been placed beyond the jurisdiction of the Court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

A TRUE BILL:

Ink Signature on File in Clerk's Office
FOREPERSON

PETER MCNEILLY
United States Attorney

By: s/ Melissa Hindman
Melissa Hindman
Assistant United States Attorney
U.S. Attorney's Office
1801 California St. Suite 1600
Denver, CO 80202
(303) 454-0125
Melissa.Hindman@usdoj.gov

HARMEET K. DHILLON
Assistant Attorney General, Civil Rights Division

By: s/ MarLa Duncan
MarLa Duncan
Trial Attorney
Civil Rights Division, Criminal Section
950 Pennsylvania Avenue, 4CON
Washington, D.C. 20530
(202) 598-3508
MarLa.Duncan@usdoj.gov

DEFENDANT: MOHAMED SABRY SOLIMAN

YOB: 1979

COMPLAINT FILED? Yes No

If yes, MAGISTRATE CASE NUMBER: 25-mj-00108-NRN

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? Yes No

OFFENSE(S): Counts 1-8: Hate Crime Acts: Willfully Causing Bodily Injury and Attempting to Kill, 18 U.S.C. §§ 249(a)(2)(A)(ii)(II), (B)(i)(II), (B)(ii), (B)(iii), and (B)(iv)(II)
Count 9: Hate Crime Acts: Using Fire, a Dangerous Weapon, or an Explosive or Incendiary Device to Attempt to Cause Bodily Injury and Attempting to Kill, 18 U.S.C. §§ 249(a)(2)(A)(ii)(II), (B)(i)(II), (B)(ii), (B)(iii), and (B)(iv)(II)
Counts 10-11: Using Fire or an Explosive to Commit a Felony, 18 U.S.C. § 844(h)(1)
Count 12: Carrying an Explosive During the Commission of a Felony, 18 U.S.C. § 844(h)(2)

LOCATION OF OFFENSE: Boulder County, Colorado, and elsewhere

PENALTY: Counts 1-8: Any term of years or life imprisonment; NMT \$250,000 fine, or both; NMT 5 years' supervised release; \$100 Special Assessment.
Count 9: Any term of years or life imprisonment; NMT \$250,000 fine, or both; NMT 5 years' supervised release; \$100 Special Assessment.
Counts 10-11: For the first count of conviction under this section, 10 years imprisonment to run consecutive to all other Counts; For the second count of conviction under this section, 20 years imprisonment to run consecutive to all other Counts; NMT \$250,000 fine, or both; NMT 3 years' supervised release; \$100 Special Assessment.
Count 12: For the first count of conviction under this section, 10 years imprisonment to run consecutive to all other Counts; For the second count of conviction under this section, 20 years imprisonment to run consecutive to all other Counts; NMT \$250,000 fine, or both; NMT 3 years' supervised release; \$100 Special Assessment.

AGENT: Special Agent Timothy Chan, FBI

AUTHORIZED BY: Melissa Hindman, Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

_____ five days or less; X over five days

THE GOVERNMENT:

X will seek detention in this case based on 18 U.S.C. § 3142(f)(1) and/or (f)(2).

_____ will not seek detention

The statutory presumption of detention **is not** applicable to this defendant.