

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT  
AND ARREST WARRANT**

I, Jessica Krueger, being duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I seek a criminal complaint charging Mohammed Sabry SOLIMAN (“SOLIMAN”) with one count of a hate crime offense involving the actual or perceived race, religion, or national origin in violation of 18 U.S.C. §§ 249(a)(1) and (a)(2).

2. I am a Special Agent with the FBI and have been since November 2009. I am involved in investigations of persons suspected of violations of Federal law in the State of Colorado and throughout the United States. I have gained experience conducting investigations through formal training and consultation with local, state, and federal law enforcement agencies as well as from law enforcement investigations themselves. I have assisted in multiple criminal investigations and participated in numerous search and arrest warrants related to such investigations.

3. The facts in this affidavit are based on my personal observations, my training and experience, and information obtained from other agents, local law enforcement, and witnesses. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

4. Based on my training and experience, and the facts sets forth in this affidavit, there is probable cause to believe that Mohammed Sabry SOLIMAN has violated 18 U.S.C. §§ 249(a)(1) and (a)(2) (hate crime offenses involving actual or perceived race, religion, or national origin) by throwing Molotov cocktails into a pro-Israel crowd while yelling “Free Palestine” and injuring eight individuals.

### **JURISDICTION AND VENUE**

5. As discussed more fully below, acts in furtherance of the offenses under investigation occurred within the District of Colorado.

### **STATUTORY AUTHORITY**

6. Under 18 U.S.C. § 249(a)(1), it is a felony when “whoever, whether or not acting under color of law, willfully causes bodily injury to any person or, through the use of fire, a firearm, a dangerous weapon, or an explosive or incendiary device, attempts to cause bodily injury to any person, because of the actual or perceived race, color, religion, or national origin of any person.”

7. Under 18 U.S.C. § 249(a)(2), it is a felony when “whoever, whether or not acting under color of law, willfully causes bodily injury to any person or, through the use of fire, a firearm, a dangerous weapon, or an explosive or incendiary device, attempts to cause bodily injury to any person, because of the actual or perceived religion, national origin, gender, sexual orientation, gender identity, or disability,” in any circumstances in which, “in connection with the conduct. . . , the defendant employs a firearm, dangerous weapon, explosive or incendiary device, or other weapon that has traveled in interstate or foreign commerce.”

### **PROBABLE CAUSE**

8. According to a post on Facebook, an organization called “Run For Their Lives” organizes a weekly walk across locations in the United States as a way to call attention to Israeli hostages still being held in Gaza. As documented in the post the organization walks in Boulder every Sunday and posted about a walk on Sunday, June 1, 2025, at 1:00 PM, at the corner of 8th and Pearl, Street, Boulder, Colorado.

9. On June 1, 2025, at approximately 2:00 p.m. MST, SOLIMAN threw two lit Molotov cocktails at individuals participating in a pro-Israel gathering near the Boulder

Courthouse, located at 1303 Pearl St, Boulder, CO 80302. When he threw the Molotov cocktails, SOLIMAN yelled “Free Palestine!” and the Molotov cocktails ignited in the crowd of people, causing burn injuries to eight individuals.

10. SOLIMAN was detained by local law enforcement. A black plastic container with a yellow top was found near where SOLIMAN was arrested. In the black plastic container were at least fourteen unlit Molotov cocktails, comprised of glass wine carafe bottles or Ball jars containing clear liquid and red rags hanging out of the bottles. Near the black plastic container was a backpack weed sprayer, potentially containing a flammable substance. The clear liquid in the glass bottles and weed sprayer were determined to be 87 octane gasoline, which was determined to contain xylene based on a field test.

11. Law enforcement located a 2015 silver Toyota Prius, Colorado license plate CQAN01, registered to SOLIMAN and parked nearby on Spruce Street and 13<sup>th</sup> Street. Visible inside the car was red material consistent with the rags found in the black plastic container; a red gas container; and paperwork with the words, “Israel,” “Palestine,” and “USAID.” The vehicle was subsequently moved to the FBI Denver facility.

12. SOLIMAN was placed under arrest and a mirandized interview was conducted by local and federal law enforcement. During the interview, SOLIMAN stated that he researched on YouTube how to make Molotov Cocktails, purchased the ingredients to do so, and constructed them. He traveled to Boulder, Colorado in his vehicle with the Molotov cocktails and threw two of the cocktails at individuals participating in a pro-Israel gathering. He also stated that he picked up gas at a gas station on the way to Boulder. He stated that he wanted to kill all Zionist people and wished they were all dead. SOLIMAN stated he would do it (conduct an attack) again. He specifically targeted the “Zionist Group” that had gathered in Boulder having learned about the

group from an online search. SOLIMAN knew that they planned to meet today, Sunday, June 1 at 1pm. He arrived at approximately 12:55 p.m. and waited for them. Throughout the interview, SOLIMAN stated that he hated the Zionist group and did this because he hated this group and needed to stop them from taking over “our land,” which he explained to be Palestine. He stated that he had been planning the attack for a year and was waiting until after his daughter graduated to conduct the attack.

13. Also during the interview, SOLIMAN stated that he resides at 2316 Washo Circle, Colorado Springs, Colorado with his wife and five children. He stated he left an iPhone at the house, hidden in a desk drawer, with messages to his family. He also stated that he left a journal inside his house.

14. According to his Colorado driver’s license, SOLIMAN resides at 2316 Washo Circle, Colorado Springs.

15. After his arrest, law enforcement officers arrived at SOLIMAN’s residence in Colorado Springs and observed his wife leaving the home. SOLIMAN’s wife then went to the Colorado Springs Police Office. She brought with her an iPhone 14 that she identified to belong to SOLIMAN and be used by other members of their family.

16. Law enforcement officers also observed the storage unit identified by a neighbor to be associated with SOLIMAN’s residence, which was located behind the residence.

17. In a video, which was posted on the social media platform X during the attack, an individual identified as SOLIMAN is seen shirtless, pacing back and forth while holding what appear to be Molotov cocktails, glass bottles containing clear liquid with a red rag hanging from the top of the bottle. He is captured on the video stating “how many children killed” then a few moments later “end Zionist.”

18. Based on my training, experience and research, I know that “Zionist” to mean individuals who believe in the establishment of a Jewish state and are supportive of the government of Israel.

19. Based on my training and experience, both the wine carafe bottles and the gasoline used to make the Molotov cocktails are not manufactured within the District of Colorado and have traveled in interstate or foreign commerce.

### **CONCLUSION**

20. Based on the above facts and information, I submit that there is probable cause to believe that Mohammed Sabry SOLIMAN has violated 18 U.S.C. § § 249(a)(1) and (a)(2) (hate crime offenses involving actual or perceived race, religion, or national origin).

I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief.

s/Jessica Krueger  
Jessica Krueger, Special Agent  
FBI

Submitted, sworn to, attested to, and acknowledged by the affiant by reliable electronic means this 1st day of June, 2025.

BY THE COURT:

N. Reid Neureiter  
THE. HON. N. REID NEUREITER  
UNITED STATES MAGISTRATE JUDGE  
DISTRICT OF COLORADO

**This Application and affidavit were reviewed and are submitted by Melissa Hindman,  
Assistant United States Attorney.**

---