

United States v. Michael Robert Solomon, et al.Criminal No. 20-193 (MJD/ECW)

and weapons, to a foreign terrorist organization, to wit: Hamas, which at all relevant times has been designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that Hamas was a designated foreign terrorist organization (as defined in 18 U.S.C. § 2339B(g)(6)), that Hamas engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the Immigration and Nationality Act), and that Hamas engages and has engaged in terrorism (as defined in Section 140(d)(2) of the Foreign Relation Authorization Act, Fiscal Years 1988 and 1989); all in violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT 2

(Attempt to Provide Material Support to a Designated Foreign Terrorist Organization)

From on or about June 1, 2020, through on or about September 3, 2020, within the State and District of Minnesota, and elsewhere, the defendants,

**MICHAEL ROBERT SOLOMON and
BENJAMIN RYAN TEETER,**

while aiding and abetting each other and others known and unknown, and being aided and abetted by each other and others known and unknown, did knowingly attempt to provide, material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b)(1), namely, tangible property and services, to a foreign terrorist organization, to wit: Hamas, which at all relevant times has been designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that Hamas was a designated foreign terrorist organization (as defined in 18 U.S.C. § 2339B(g)(6)), that Hamas engages and has engaged

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in terrorist activity (as defined in Section 212(a)(3)(B) of the Immigration and Nationality Act), and that Hamas engages and has engaged in terrorism (as defined in Section 140(d)(2) of the Foreign Relation Authorization Act, Fiscal Years 1988 and 1989); all in violation of Title 18, United States Code, Sections 2339B(a)(1) and 2.

COUNT 3

(Possession of Unregistered Firearms – Silencers)

On or about July 30, 2020, within the State and District of Minnesota, and elsewhere, the defendants,

**MICHAEL ROBERT SOLOMON and
BENJAMIN RYAN TEETER,**

while aiding and abetting each other and others known and unknown, and being aided and abetted by each other and others known and unknown, did knowingly possess firearms, as defined by Title 18, United States Code, Section 921(a)(24) and Title 26, United States Code, Section 5845(a)(7), namely the following:

| Description | Serial Number |
|---|------------------|
| A metal cylindrical device, green in color, measuring approximately 6 inches in overall length with an outside diameter of approximately 1-1/2 inches | No serial number |
| A metal cylindrical device, green in color, measuring approximately 6 inches in overall length with an outside diameter of approximately 1-1/2 inches | No serial number |
| A metal cylindrical device, green in color, measuring approximately 6 inches in overall length with an outside diameter of approximately 1-1/2 inches | No serial number |
| A metal cylindrical device, green in color, measuring approximately 6 inches in overall length with an outside diameter of approximately 1-1/2 inches | No serial number |

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| | |
|---|------------------|
| A metal cylindrical device, green in color, measuring approximately 6 inches in overall length with an outside diameter of approximately 1-1/2 inches | No serial number |
|---|------------------|

each of which by design, construction, and function is a device for silencing and diminishing the report of a portable firearm, none of which were registered to him in the National Firearms Registration and Transfer Record as required by law; all in violation of Title 26, United States Code, Sections 5841, 5861(d) and 5871, and Title 18 United States Code Section 2.

COUNT 4

(Unlawful Possession of a Machine Gun)

On or about August 29, 2020, within the State and District of Minnesota, and elsewhere, the defendants,

**MICHAEL ROBERT SOLOMON and
BENJAMIN RYAN TEETER,**

while aiding and abetting each other and others known and unknown, and being aided and abetted by each other and others known and unknown, did knowingly possess a machinegun, namely a "Swift Link" type conversion device mounted within a "bracket" and one partially fitted "Swift Link" conversion device having no manufacturer's markings or serial numbers, all in violation of Title 18, United States Code, Sections 922(o), 924(a)(2), and 2.

FORFEITURE ALLEGATIONS

The allegations in Counts 1 and 2 of this Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461(c).

The violation of Title 18, United States Code, Section 2339B(a)(1) alleged in Counts 1 and 2 of this Indictment are acts of international terrorism, as defined in Title 18, United States Code, Section 2331, against an international organization or foreign government.

Upon conviction of the offense alleged in Counts 1 and 2, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461(c), all assets, foreign and domestic.

Counts 3 and 4 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 924(d)(1), in conjunction with Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c).

If convicted of Count 3 of this indictment, the defendants shall forfeit to the United States any and all firearms, accessories, and ammunition involved in or used in connection with such violation, including but not limited to the five (5) metal cylindrical devices, green in color, measuring approximately 6 inches in overall length with an outside diameter of

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approximately 1-1/2 inches, bearing no serial number pursuant to Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c).

If convicted of Count 4 of this indictment, the defendants shall forfeit to the United States any and all firearms involved in such violation, including the "Swift Link" type conversion device mounted within a "bracket" and one partially fitted "Swift Link" conversion device having no manufacturer's markings or serial numbers, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON