

United States v. Michael Robert Solomon, et al.

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 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.

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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 defendant 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 of his assets, foreign and domestic.

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON