

EMR:EWS/BG
F. #2026R000058

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

COMPLAINT

- against -

26-MJ-41

DAN SOHAIL,

(18 U.S.C. § 247(a)(1))

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

SHANNON BOOTH, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

On or about January 28, 2026, within the Eastern District of New York and elsewhere, the defendant DAN SOHAIL intentionally defaced, damaged and destroyed religious real property, to wit: Chabad Headquarters, located at 770 Eastern Parkway, Brooklyn, New York, because of the religious character of that property.

(Title 18, United States Code, Section 247(a)(1)(a)(1))

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have participated in investigations into civil rights violations, hate crimes, and other federal crimes. I have been an FBI Special Agent for four years. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of the investigative file, and from reports of other law enforcement officers involved in the investigation.

2. At all times relevant to this Complaint, unless otherwise indicated:

3. The defendant DAN SOHAIL is a resident of Carteret, New Jersey.

4. The Chabad-Lubavitch movement ("Chabad") is a Chasidic spiritual movement, a religious practice within Judaism. Chabad has emissaries and outposts throughout the world, including in the Eastern District of New York. The global headquarters for Chabad is located at 770 Eastern Parkway, Brooklyn, New York ("Chabad Headquarters"), which is one of the most widely-recognized Jewish buildings in the United States. The Chabad Headquarters includes a synagogue and other religious gathering spaces.

5. On or about January 28, 2026, during the evening, Chabad hosted an event at Chabad Headquarters marking the anniversary of the death of the Chabad movement's leader. The event was attended by dozens of people.

6. Based on my review of surveillance footage, I know that at approximately 8:40 PM ET, the defendant DAN SOHAIL drove to the side entrance of Chabad Headquarters, exited his vehicle, and moved stanchions that were set up to protect the building and its occupants.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

He then gestured for various congregants to move away from the entrance to the building. SOHAIL returned to his vehicle and, in the presence of crowd of people, drove his car into the building's side entrance. He then reversed his vehicle before accelerating again into the entrance four additional times. As depicted below, the impact knocked the entrance door off its hinges and destroyed the bumper of SOHAIL's car. No one was injured in the incident.



7. The defendant DAN SOHAIL was arrested on the scene and taken into custody. During a post-arrest interview, SOHAIL acknowledged that he previously visited Chabad Headquarters. He further stated, in sum and substance, that he had recently learned he had Jewish heritage and was in the process of learning more about the Jewish tradition, was invited to the event at Chabad Headquarters that night, and had lost control of the car because of icy conditions and because he was wearing heavy boots, which caused him to press the gas pedal.

WHEREFORE, your deponent respectfully requests that the defendant DAN SOHAIL, be dealt with according to law.

[REDACTED]

SHANNON BOOTH
Special Agent, Federal Bureau of Investigation

Sworn to before me this
24th day of February, 2026

Joseph A. Marutollo

THE HONORABLE JOSEPH A. MARUTOLLO
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK