

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 2:19-cr- *150-FtM-38NPM*
18 U.S.C. § 1951
18 U.S.C. § 924

ALEX JARED ZWIEFELHOFER
and CRAIG AUSTIN LANG

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U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS, FLORIDA

INDICTMENT

The Grand Jury charges:

COUNT ONE

(Conspiracy to Interfere with Commerce by Robbery)

Beginning on an unknown date, but not later than in or about March 2018, and continuing through at least in or about August 2018, in the Middle District of Florida, and elsewhere, the defendants,

**ALEX JARED ZWIEFELHOFER
and
CRAIG AUSTIN LANG,**

did knowingly, willfully, and unlawfully conspire, confederate, and agree with each other to, in any way and degree, obstruct, delay, and affect commerce, as that term is defined in 18 U.S.C. § 1951(b)(3), and the movement of any article and commodity in such commerce, by robbery, as that term is defined in 18 U.S.C. § 1951(b)(1), that is, by knowingly and unlawfully taking and obtaining personal property from the person and in the presence of another, in that the

defendants did conspire, confederate, and agree with each other to unlawfully take and obtain personal property consisting of United States currency belonging to S.L., Jr., in the presence of another individual and against S.L., Jr.'s will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person.

In violation of 18 U.S.C. § 1951(a).

COUNT TWO
(Interference with Commerce by Robbery)

On or about April 9, 2018, in the Middle District of Florida, and elsewhere, the defendants,

ALEX JARED ZWIEFELHOFER
and
CRAIG AUSTIN LANG,

aiding and abetting one another, did knowingly, in any way and degree, obstruct, delay, and affect commerce, and attempt to obstruct, delay, and affect commerce, as that term is defined in 18 U.S.C. § 1951(b)(3), and the movement of any article and commodity in such commerce, by robbery, as that term is defined in 18 U.S.C. § 1951(b)(1), that is, by knowingly and unlawfully taking and obtaining personal property of S.L., Jr., consisting of \$3,000 in United States currency to be used by S.L., Jr. for the purchase of

firearms posted for sale on Armslist, from his person and in the presence of another, against S.L., Jr.'s will, by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person.

In violation of 18 U.S.C. §§ 1951(a) and 2.

COUNT THREE
**(Conspiracy to Use a Firearm During and
in Relation to a Crime of Violence)**

Beginning on an unknown date, but not later than in or about March 2018, and continuing through in or about August 2018, in the Middle District of Florida, and elsewhere, the defendants,

ALEX JARED ZWIEFELHOFER
and
CRAIG AUSTIN LANG,

did knowingly, willfully, and unlawfully conspire, confederate, and agree with each other to use, carry, brandish, and discharge a firearm, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, and to possess said firearm in furtherance of said crime of violence, that is, Interference with Commerce by Robbery, in violation of 18 U.S.C. § 1951(a) as alleged in Count Two of this Indictment, which is incorporated herein by reference as if set forth in full.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(iii) and 924(o).

COUNT FOUR
(Use of a Firearm During and in Relation to a Crime of Violence)

On or about April 9, 2018, in the Middle District of Florida, the
defendants,

ALEX JARED ZWIEFELHOFER
and
CRAIG AUSTIN LANG,

aiding and abetting one another, did knowingly use, carry, brandish, and discharge a firearm, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, specifically, Interference with Commerce by Robbery, as alleged in Count Two of this Indictment (which Count is incorporated herein by reference as if set forth in full), and, in the course of said violation and through the use of such firearm, did cause the death of a person, namely S.L., Jr., and D.L., by murder as defined in 18 U.S.C. § 1111.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(iii), 924(j)(1), and 2.

FORFEITURE

1. The allegations contained in Counts One, Two, Three, and Four of this Indictment are incorporated by reference for the purpose of alleging forfeiture, pursuant to provisions of 18 U.S.C. §§ 924(d), 981(a)(1)(C) and 28

U.S.C. § 2461(c).

2. Upon conviction of a violation of 18 U.S.C. § 1951, as alleged in Counts One and Two, the defendants, ALEX JARED ZWIEFELHOFER and CRAIG AUSTIN LANG, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense. The property to be forfeited includes, but is not limited to, a \$3,000 forfeiture money judgment, which represents the proceeds of the offense.

3. Upon conviction of a violation of 18 U.S.C. § 924, as alleged in Counts Three and Four, the defendants, ALEX JARED ZWIEFELHOFER and CRAIG AUSTIN LANG, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in or used in the offense.

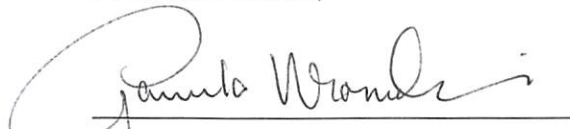
4. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- 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;

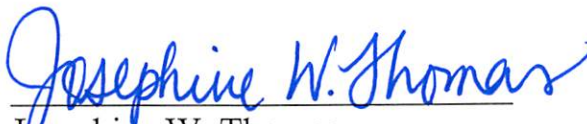
the United States shall be entitled to the forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,


Foreperson

MARIA CHAPA LOPEZ
United States Attorney

By: 
Jesus M. Casas
Assistant United States Attorney
Chief, Fort Myers Division

By: 
Josephine W. Thomas
Assistant United States Attorney
Chief, Criminal Division

No.

UNITED STATES DISTRICT COURT
Middle District of Florida
Fort Myers Division

THE UNITED STATES OF AMERICA

vs.

ALEX JARED ZWIEFELHOFER
and CRAIG AUSTIN LANG

INDICTMENT

Violations: 18 U.S.C. § 1951
18 U.S.C. § 924

A true bill,


Foreperson

Filed in open court this 11th day
of September, 2019.

Clerk

Bail \$ _____
