

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
FORT MYERS DIVISION

UNITED STATES OF AMERICA,

v.

CRAIG AUSTIN LANG,

Defendant.

Case No. ~~2:19-mj-1098-NPM~~

2: ~~19~~ ~~mc~~ - ~~19~~ -FtM-

SUPPLEMENTAL<sup>1</sup> AFFIDAVIT IN SUPPORT OF REQUEST FOR EXTRADITION

I, Jesus M. Casas, being duly sworn, depose and state:

1. I am a citizen of the United States of America and a resident of Florida.
2. From November 2002 until the present, I have worked for the United States Department of Justice as an Assistant United States Attorney for the Middle District of Florida. I prosecute persons charged with criminal violations of the laws of the United States. I have been a practicing attorney since 1998, and have been a federal prosecutor in the Middle District of Florida since 2002. As an Assistant United States Attorney, I prosecute a variety of federal offenses, including offenses involving Interference with Commerce by Violence, Conspiracy, and the Carrying and Use of a Firearm During and in Relation to a Crime of Violence. During my practice as an Assistant United States Attorney, I have become knowledgeable about the criminal laws and procedures of the United States.

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<sup>1</sup> This supplemental affidavit consists of information originally provided in support of the extradition of Craig Austin Lang, as well as new information related to the two additional criminal offenses alleged since the original extradition request was submitted for consideration.

3. As an Assistant United States Attorney for the Middle District of Florida, I am responsible for the preparation and prosecution of criminal cases. In the course of my duties, I have become familiar with the charges and evidence in the case of *United States v. Craig Austin Lang, et al.*, Criminal Case No. 2:19-cr-150-FtM.

#### PROCEDURAL HISTORY OF THE CASE

4. On August 16, 2019, United States Magistrate Judge Nicholas P. Mizell issued an arrest warrant for CRAIG AUSTIN LANG ("LANG") based upon a Criminal Complaint and supporting affidavit that established probable cause for the commission of violations of United States laws relating to Conspiracy to Interfere with Commerce by Violence; Interference with Commerce by Violence; Conspiracy to Carry and Use a Firearm During and in Relation to a Crime of Violence; and Use and Discharge of a Firearm During and in Relation to Crime of Violence Resulting in Death. A Criminal Complaint is a written statement of the essential facts constituting the offenses charged. The Complaint must be made under oath before a United States Magistrate Judge. After a Criminal Complaint is reviewed and approved, the court will normally issue a warrant for the arrest of the defendant, if he or she is not yet in custody.

5. On September 11, 2019, a grand jury<sup>2</sup> in the Middle District of Florida returned

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<sup>2</sup> Under the federal laws of the United States, a grand jury is composed of not less than 16 people whom the United States District Court selects at random from the residents of that district. The grand jury is an independent body impaneled by the court. The purpose of the grand jury is to examine the evidence of crimes presented to it by United States law enforcement authorities. After independently reviewing this evidence, each member of the grand jury must determine if there is sufficient evidence to find that a crime has been committed and that the particular defendant or defendants committed the crime. After at least 12 grand jurors affirmatively vote that there is sufficient evidence to believe that the defendant committed the crime or crimes, the

and filed an Indictment charging LANG with four violations of federal law. The four alleged violations are referred to as counts in the Indictment and in this affidavit. Count One of the Indictment charges LANG with Conspiracy to Interfere with Commerce by Robbery, 18 U.S.C. § 1951(a). Count Two of the Indictment charges LANG with Interference with Commerce by Robbery, 18 U.S.C. § 1951(a) and 2. Count Three of the Indictment charges LANG with Conspiracy to Use a Firearm During and in Relation to a Crime of Violence, 18 U.S.C. § 924(c)(1)(A) and 924(o). Count Four of the Indictment charges LANG with Use of a Firearm During and in Relation to a Crime of Violence, 18 U.S.C. § 924(c)(1)(A) and 924(j)(1) and 2.

6. On December 4, 2019, a grand jury in the Middle District of Florida returned and filed a Superseding Indictment charging LANG and his co-defendant, Alex Jared Zwiefelhofer, with six violations of federal law. The Superseding Indictment includes the four allegations contained in the original Indictment, as well as two additional counts alleging two new federal offenses against LANG and Zwiefelhofer<sup>3</sup>. These two new offenses in the Superseding Indictment allege criminal conduct that was not included in the original Indictment and these new offenses required Department of Justice approval prior to presentation to the grand jury. Upon receiving approval from the Department of Justice to

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grand jury may return an indictment. An indictment is a document that formally charges the defendant with a crime or crimes, describes the specific laws that the defendant is accused of violating, and describes the acts of the defendant that are alleged to be violations of the law. Once the grand jury has returned an indictment, the same grand jury may hear additional evidence to amend or supersede the indictment or add additional charges.

<sup>3</sup> The Superseding Indictment also contains “Special Findings” that were not contained within the original Indictment. The “Special Findings” are only applicable to Alex Jared Zwiefelhofer and not to LANG.

charge these two new offenses, the charges were presented to the grand jury for their consideration and approval.

7. Count Five of the Superseding Indictment charges LANG with Conspiracy to Kill, Kidnap, and Maim Persons in a Foreign Country, in violation of 18 U.S.C. § 956(a)(1). Count Six of the Superseding Indictment charges CRAIG AUSTIN LANG with Violation of the Neutrality Act, in violation of 18 U.S.C. § 960.

8. As a result of the return of the Superseding Indictment charging LANG and his co-defendant, Alex Jared Zwiefelhofer, with additional offenses, a new arrest warrant was issued by the court. The arrest warrant authorizes the arrest of LANG for the offenses charged in the Superseding Indictment. The new arrest warrant is attached to this supplemental affidavit as Exhibit 2.

**The New Charges in the Superseding Indictment and Pertinent United States Law**

**Conspiracy to Kill, Kidnap, Maim, or Injure Persons in a Foreign Country**

9. In the Superseding Indictment, LANG is charged with Conspiracy to Kill, Kidnap, and Maim Persons in a Foreign Country, specifically the Bolivarian Republic of Venezuela, in violation of Title 18, United States Code, Section 956(a)(1). Under United States law, a conspiracy is simply an agreement to commit one or more “substantive” criminal offenses, referred to as the purpose or object or objective of the conspiracy. The crime of conspiracy is an independent offense, separate and distinct from the commission of any substantive offense. Under United States law, a person can be charged with conspiracy if (1) two or more persons entered an agreement to commit one or more substantive offenses; (2) the defendant knowingly and intentionally became a member of the conspiracy to commit at least one of

the substantive offenses; and (3) that at least one co-conspirator committed at least one overt act in furtherance of the conspiracy. An overt act is any action taken to further the objective of the conspiracy, and need not itself be a criminal act. The Superseding Indictment alleges eight overt acts in furtherance of the conspiracy alleged in Count Five.

10. The objective of the charged conspiracy to kill, kidnap, and maim persons in a foreign country was to overthrow the government of the Bolivarian Republic of Venezuela. LANG and his co-conspirator, Alex Jared Zwiefelhofer, agreed to travel to the country of Venezuela to overthrow by force the government of Venezuela. In furtherance of the conspiracy, LANG: (1) discussed with others the plan to fight the Venezuelan government and to kill people; (2) obtained firearms, ammunition and other military equipment that he planned to take to Venezuela for the purpose of fighting against the Venezuelan government; (3) traveled from the State of Arizona to the State of Florida with firearms, ammunition and other military equipment; and (4) committed an armed robbery of \$3,000 in U.S. currency from S.L., Jr. and D.L. to fund their travel to Venezuela.

Violation of the Neutrality Act

11. The Superseding Indictment also charges a substantive violation of The Neutrality Act, in violation of Title 18, United States Code, Section 960. Section 960 makes it illegal for a person to begin, provide funding, or take part in any military or naval expedition against any foreign state with whom the United States is at peace. LANG and Alex Jared Zwiefelhofer are charged with violating the Neutrality Act by organizing, beginning, embarking, providing, preparing, furnishing money for and taking part in a military expedition against the Bolivarian Republic of Venezuela.

12. The maximum sentence that can be imposed upon conviction for each offense described in the Superseding Indictment and the above paragraphs of this Supplemental Affidavit is as follows:

- a. **Conspiracy to Interfere with Commerce by Violence** – up to 20 years' imprisonment, a fine of up to \$250,000, and a term of supervised release following imprisonment of up to three years;
- b. **Interference with Commerce by Violence** – up to 20 years' imprisonment, fine of up to \$250,000, and a term of supervised release following imprisonment of up to three years;
- c. **Conspiracy to Carry and Use a Firearm During and in Relation to a Crime of Violence** – up to 20 years' imprisonment, a fine of up to \$250,000, and a term of supervised release following imprisonment of up to three years; and
- d. **Use and Discharge of a Firearm During the Commission of a Crime of Violence Resulting in Death** – Death or a minimum mandatory term of imprisonment of 10 years up to any term of years or life imprisonment, a fine of up to \$250,000, and a term of supervised release following imprisonment of up to five years.
- e. **Conspiracy to Kill, Kidnap, and Maim Persons in a Foreign Country** – Imprisonment for any term of years or for life if the offense is conspiracy to murder or kidnap; and imprisonment for not more than 35 years if the offense is conspiracy to maim.

- f. **Violation of the Neutrality Act** – Imprisonment for up to three years, a fine of up to \$250,000, and a term of supervised release following imprisonment of up to one year.

13. Title 18, United States Code, Section 3281 and 3282 set forth the statutes of limitation governing the prosecutions of these offenses charged in the Superseding Indictment<sup>4</sup>. The criminal offenses charged in the Superseding Indictment in this case occurred in 2018. Since the offenses occurred less than five years ago, prosecution of these offenses is not barred by either of the statutes of limitation.

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<sup>4</sup> A criminal complaint is the charging instrument that commonly precedes an indictment when a defendant is the subject of an arrest warrant. The United States obtained an indictment of Lang and Zwiefelhofer. Because additional charges were returned by the grand jury against Lang and Zwiefelhofer, a superseding indictment is now the pertinent charging instrument.

CONCLUSION

14. I have attached the following documents in support of this extradition of CRAIG AUSTIN LANG:

- a. Exhibit 1: A certified true and accurate copy of the Superseding Indictment.
- b. Exhibit 2: A certified true and accurate copy of the arrest warrant for CRAIG AUSTIN LANG.
- c. Exhibit 3: True and accurate copies of the applicable criminal statutes and regulations.
- d. Exhibit 4: Affidavit, with attachments, of Special Agent James Roncinske, dated December 11, 2019, including a verified photograph of CRAIG AUSTIN LANG.

15. If Ukrainian authorities or a Ukrainian court believes that additional information is needed in support of this extradition request after the submission of this request, the United States, (through the Department of Justice, Office of International Affairs) hereby requests that it be given notification of any perceived deficiencies immediately, and that the United States be given an opportunity to supplement its request for extradition within a reasonable time period.

16. I have thoroughly reviewed Special Agent Roncinske's affidavit<sup>5</sup> and the attachments, and attest that this evidence indicates that CRAIG AUSTIN LANG is guilty of

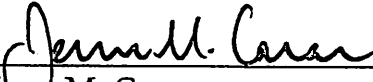
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<sup>5</sup> The special agent's supplemental affidavit describes the conduct for all of the crimes for which LANG is requested to be extradited, including those crimes that were described in the original special agent's affidavit.

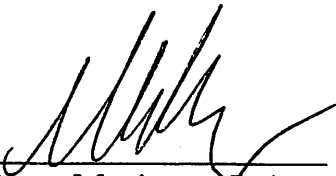


the offenses charged in the Superseding Indictment. This affidavit and the affidavit of Special Agent Roncinske was sworn before a United States Magistrate Judge legally authorized to administer an oath for this purpose.

I swear under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
Jesus M. Casas  
Chief Assistant United States Attorney  
Fort Myers Division

Signed and sworn to before me this 10<sup>th</sup> day of December, 2019 in Fort Myers, Florida.

  
\_\_\_\_\_  
United States Magistrate Judge  
Middle District of Florida

# EXHIBIT 1

I CERTIFY THE FOREGOING TO BE A TRUE  
AND CORRECT COPY OF THE ORIGINAL

CLERK OF COURT  
UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA

BY: [Signature] UNITED STATES DISTRICT COURT  
DEPUTY CLERK MIDDLE DISTRICT OF FLORIDA  
FORT MYERS DIVISION

2019 DEC -4 PM 4:43  
CLERK OF COURT  
UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
FORT MYERS DIVISION

FILED

UNITED STATES OF AMERICA

v.

CASE NO. 2S:19-cr-150-FtM-38NPM

18 U.S.C. § 1951(a)  
18 U.S.C. §§ 924(c), (j), (o)  
18 U.S.C. § 956(a)(1)  
18 U.S.C. § 960

ALEX JARED ZWIEFELHOFER  
and CRAIG AUSTIN LANG

**SUPERSEDING 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 Superseding Indictment.

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  
Superseding 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.

**COUNT FIVE**  
**(Conspiracy to Kill, Kidnap, or Maim Persons in a Foreign Country)**

Beginning on an unknown date, but no later than in or about February 2018, and continuing through at least in or about October 2018, in the Middle District of Florida, and elsewhere within the jurisdiction of the United States, the defendants,

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

did unlawfully and knowingly conspire, with each other and others known and unknown to the Grand Jury, to commit at a place outside the United States, namely Venezuela, an act that would constitute the offense of murder, kidnapping, and maiming a person if such act were committed within the special maritime and territorial jurisdiction of the United States.

In furtherance of the conspiracy and to effect the objects thereof, the defendants committed and caused to be committed, within the Middle District of Florida and elsewhere within the jurisdiction of the United States, at least one of the following overt acts, among others:

a. On or about February 26, 2018, the defendants communicated with each other via an online platform about participating in

military-like raids in Venezuela;

b. On or about March 31, 2018, the defendants communicated with each other and others via an online platform about their plans to fight against the Venezuelan government, including that the defendants would “kill people”;

c. On or about April 1, 2018, the defendants discussed, via an online platform, the firearms, ammunition, and other military equipment that the defendants planned to bring to Venezuela for the purpose of fighting against the Venezuelan government;

d. On or about April 4, 2018, the defendants traveled via Greyhound bus to Miami, Florida;

e. On or about April 7, 2018, a conspirator searched the internet about how an individual could smuggle oneself to South America;

f. On or about April 7, 2018, the defendants visited a military surplus store in the Miami, Florida area;

g. On or about April 9, 2018, the defendants traveled from Miami, Florida, to Estero, Florida, to commit an armed robbery of S.L., Jr. and D.L., to obtain money and property to fund the defendants’ travel to Venezuela; and



h. On or about April 9, 2018, the defendants committed an armed robbery and the murder of S.L., Jr. and D.L., and stole \$3,000 in United States currency from S.L., Jr., to fund their planned travel to Venezuela.

All in violation of 18 U.S.C. § 956(a)(1).

**COUNT SIX**  
**(Violation of the Neutrality Act)**

Beginning on an unknown date, but no later than in or about February 2018, and continuing through at least in or about October 2018, in the Middle District of Florida, and elsewhere within the United States, the defendants,

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

did knowingly organize, begin, set on foot, provide a means for, prepare a means for, furnish the money for, and take part in, a military expedition and enterprise to be carried on against the territory and dominion of any foreign state, district, and people with whom the United States is at peace, namely Venezuela.

In violation of 18 U.S.C. § 960.

**SPECIAL FINDINGS**

The Grand Jury repeats and re-alleges the accusations of **Count Four** of the Superseding Indictment. As to **Count Four**, alleging the murders of S.L., Jr. and D.L., the Grand Jury finds that the defendant, **ALEX JARED ZWIEFELHOFER**:

1. was 18 years of age or older at the time of the offense charged (18 U.S.C. § 924(c)(1)(A)(iii), 924(j)(1), and 2);
2. intentionally killed the victims, S.L., Jr. and D.L. (18 U.S.C. § 3591(a)(2)(A));
3. intentionally inflicted serious bodily injury that resulted in the death of S.L., Jr. and D.L. (18 U.S.C. § 3591(a)(2)(B));
4. intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victims, S.L., Jr. and D.L., died as a direct result of the act (18 U.S.C. § 3591(a)(2)(C)); and
5. intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a

reckless disregard for human life, and S.L., Jr. and D.L. died as direct result of the act (18 U.S.C. § 3591(a)(2)(D)).

The Grand Jury further finds that the defendant, **ALEX JARED ZWIEFELHOFFER**:

6. committed the offense in the expectation of the receipt of anything of pecuniary value (18 U.S.C. § 3592(c)(8));

7. committed the offense after substantial planning and premeditation to cause the death of a person (18 U.S.C. § 3592(c)(9)); and

8. intentionally killed and attempted to kill more than one person in a single criminal episode (18 U.S.C. § 3592(c)(16)).

#### **FORFEITURE**

1. The allegations contained in Counts One, Two, Three, and Four of this Superseding 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 ZWIEFELHOFFER** 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.

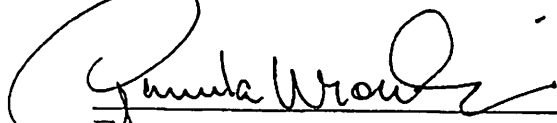
3. Upon conviction of a violation of 18 U.S.C. § 924, as alleged in Counts Three and Four, the defendants, **ALEX JARED ZWIEFELHOFER** and **CRAIG AUSTIN LANG**, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in or used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

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

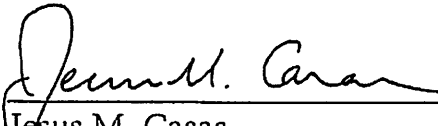
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

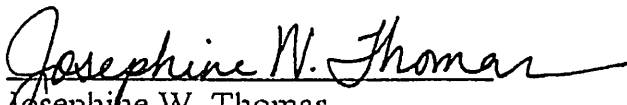
the United States shall be entitled to the forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

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

FORM OBD-34 Case 2:19-cr-00150-SPC-NPM Document 32 Filed 12/04/19 Page 12 of 12 PageID 178  
December 19 No.

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**UNITED STATES DISTRICT COURT**  
Middle District of Florida  
Fort Myers Division

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THE UNITED STATES OF AMERICA

vs.

ALEX JARED ZWIEFELHOFER  
and CRAIG AUSTIN LANG


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**INDICTMENT**

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Violations: 18 U.S.C. § 1951(a)  
18 U.S.C. §§ 924(c), (j)  
18 U.S.C. § 956(a)(1)  
18 U.S.C. § 960

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A true bill,  
  
Foreperson

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Filed in open court this 4<sup>th</sup> day  
of December, 2019.

\_\_\_\_\_  
Clerk

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Bail \$ \_\_\_\_\_

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## EXHIBIT 2

## UNITED STATES DISTRICT COURT

for the

Middle District of Florida

United States of America

v.

ALEX JARED ZWIEFELHOFER and  
CRAIG AUSTIN LANGDefendant

Case No. 2S:19-cr-150-FtM-384M

RECEIVED  
U.S. MARSHAL  
2019 DEC 5 AM 9:00  
MIDDLE DIST. OF FLORIDA  
FORT MYERS

## ARREST WARRANT

To: Any authorized law enforcement officer

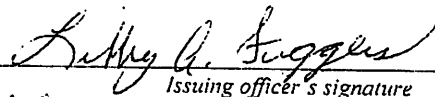
**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) CRAIG AUSTIN LANG

who is accused of an offense or violation based on the following document filed with the court:

- ☐ Indictment     ☒ Superseding Indictment     ☐ Information     ☐ Superseding Information     ☐ Complaint  
☐ Probation Violation Petition     ☐ Supervised Release Violation Petition     ☐ Violation Notice     ☐ Order of the Court

This offense is briefly described as follows:

Ct. 1 - 18 U.S.C. § 1951(a) - Conspiracy to Interfere with Commerce by Violence; Ct. 2 - 18 U.S.C. § 1951(a) - Interference with Commerce by Robbery; Ct. 3 - 18 U.S.C. §§ 924(c)(1)(A)(iii), (o) - Conspiracy to Use a Firearm During a Crime of Violence; Ct. 4 - 18 U.S.C. §§ 924(c)(1)(A)(iii), (j) - Use and Discharge of a Firearm During and in Relation to a Crime of Violence which resulted in the Death of a Person; Ct. 5 - 18 U.S.C. § 956(a)(1) - Conspiracy to Kill, Kidnap, or Maim Persons in a Foreign Country; Ct. 6 - 18 U.S.C. § 960 - Violation of the Neutrality Act.

Date: 12/04/2019
  
 Issuing officer's signature
City and state: Fort Myers, Florida

Elizabeth Warren, U.S. District Clerk

(Printed name and title)

For Investigative Purposes Only

Return

This warrant was received on (date) 12/04/2019 and the person was arrested on (date) \_\_\_\_\_  
at (city and state) \_\_\_\_\_

Date: \_\_\_\_\_

HOLDS ORIGINAL WARRANT

OFFICE: FE - Myers, FE

Arresting officer's signature

Printed name and title



## EXHIBIT 3

EXHIBIT 3  
RELEVANT STATUTORY PROVISIONS

1. **Title 18, United States Code, Section 1951(a)** states in relevant part that:

(a) Whoever in any way or degree obstructs, delays, or affects commerce or the movement of any article or commodity in commerce, by robbery . . . or attempts or conspires so to do, . . . shall be fined under this title or imprisoned not more than twenty years, or both.

(b) As used in this section –

(1) The term “robbery” means the unlawful taking or obtaining of personal property from the person or in the presence of another, against his will, by means of actual or threatened force, or violence, or fear of injury, immediate or future, to his person or property, or property in his custody or possession, or the person or property of a relative or member of his family or of anyone in his company at the time of the taking or obtaining.

...

(3) The term “commerce” means commerce within the District of Columbia, or an Territory or Possession of the United States; all commerce between any point in a State, Territory, Possession, or the District of Columbia and any point outside thereof; all commerce between points within the same State through any place outside such State; and all other commerce over which the United States has jurisdiction.

2. **Title 18, United States Code, Section 924(c)(1)(A)(iii) and (c)(3)(A)** states in relevant part that:

Except to the extent that a greater minimum sentence is otherwise provided by this subsection or by any other provision of law, any person who, during and in relation to any crime of violence . . . for which the person may be prosecuted in a court of the United States, uses or carries a firearm, or who, in furtherance of any such crime, possesses a firearm, shall, in addition to the punishment provided for such crime of violence . . .

(iii) if the firearm is discharged, be sentenced to a term of imprisonment of not less than 10 years.

(3) For purposes of this subsection the term “crime of violence” means an offense that is a felony and –

(A) has an element, the use, attempted use, or threatened use of physical force against the person or property of another, . . . .

3. **Title 18, United States Code, Section 924(j)(1)** states in relevant part that:

(j) A person who, in the course of a violation of subsection (c), causes the death of a person through the use of a firearm, shall ---

(1) if the killing is a murder (as defined in section 1111), be punished by death or by imprisonment for any term of years or for life;

**Section 1111(a):**

(a) Murder is the unlawful killing of a human being with malice aforethought. Every murder perpetrated by poison, lying in wait, or any other kind of willful, deliberate, malicious, and premeditated killing; or committed in the perpetration of or attempt to perpetrate, any . . . robber; . . . is murder in the first degree.

4. **Title 18, United States Code, Section 924(o)** states in relevant part that:

A person who conspires to commit an offense under subsection (c) shall be imprisoned for not more than 20 years, fined under this title, or both.

5. **Title 18, United States Code, Section 2** states that:

(a) Whoever commits an offense against the United States or aids, abets, counsels, commands, induces or procures its commission, is punishable as a principal.

(b) Whoever willfully causes an act to be done which if directly performed by him or another would be an offense against the United States, is punishable as a principal.

6. **Title 18, United States Code, Section 3281** provides:

An indictment for any offense punishable by death may be found at any time without limitation.

7. **Title 18, United States Code, Section 3282(a)** states that:

“Except as otherwise expressly provided by law, no person shall be prosecuted, tried, or punished for any offense, not capital, unless the indictment is found  
or  
the information is instituted within five years next after such offense shall have been committed.

8. **Title 18, United States Code, Section 956(a)(1) and (a)(2)** states that:

(a)(1) “Whoever, within the jurisdiction of the United States, conspires with one or more other persons, regardless of where such other person or persons are located, to commit at any place outside the United States an act that would constitute the offense of murder, kidnapping, or maiming if committed in the special maritime and territorial jurisdiction of the United States shall, if any of the conspirators commits an act within the jurisdiction of the United States to effect any object of the conspiracy, be punished as provided in subsection (a)(2).”

(a)(2) The punishment for an offense under subsection (a)(1) of this section is

(A) Imprisonment for any term of years or for life if the offense is conspiracy to murder or kidnap; and

(B) Imprisonment for not more than 35 years if the offense is conspiracy to maim.

9. **Title 18, United States Code, Section 960** states that:

“Whoever, within the United States, knowingly begins or sets on foot or provides for or furnishes the money for, or takes part in, any military or naval expedition or enterprise to be carried on from thence against the territory or dominion of any foreign prince or state, or of any colony, district, or people with whom the United States is at peace, shall be fined under this title or imprisoned not more than three years, or both.”

## EXHIBIT 4

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
FORT MYERS DIVISION

UNITED STATES OF AMERICA,	)	
	)	
	)	
v.	)	Case No.
	)	
CRAIG AUSTIN LANG,	)	
	)	
Defendant.	)	

AFFIDAVIT IN SUPPORT OF REQUEST FOR EXTRADITION

I, James M. Roncinske, being duly sworn, depose and state:

1. I am citizen of the United States of America and a resident of Florida.
2. I am employed by the Federal Bureau of Investigation (FBI) as a Special Agent (SA) and have been so employed since October of 1999.
3. I was a police officer for the City of Rochester, New York, from September of 1990 to October of 1999.
4. As both a police officer and an FBI Special Agent, I have received extensive training and experience in conducting robbery investigations, and in particular, those that have a Federal nexus such as violations of 18 U.S.C. § 1951 (Interference with Commerce by Violence) and 18 U.S.C. § 924(c)(1)(A) (Use of a Firearm During and in Relation to a Crime of Violence).
5. I am currently the case agent in the investigation of Craig Austin Lang (LANG). I have personally participated in this investigation and I am familiar with

the facts and circumstances of this investigation. I have not included in this affidavit each and every fact and circumstance known to me. I have only included those facts and circumstances that I believe are sufficient to establish that LANG was part of a conspiracy to interfere with commerce by robbery and to use and carry a firearm during that robbery; that LANG did use and carry a firearm during a robbery that resulted in the death of two persons in the United States; that LANG conspired with Alex Jared Zwiefelhofer and others to kill, kidnap or maim persons in a foreign country and that LANG violated the Neutrality Act.

6. This affidavit is made in support of an application for the extradition of United States citizen Craig Austin LANG, who I know and recognize based upon this investigation. LANG's photograph is contained within Attachment "A".

### **INVESTIGATION AND PROBABLE CAUSE**

#### ***a. The Crime Scene***

7. On Monday, April 9, 2018, at 10:55 p.m., the Lee County Sheriff's Office (LCSO) received multiple 911 calls for service in reference to reports of rapid gunfire being heard in the area of Cypress Park Circle, Estero, Florida. LCSO deputies responded to the area in which the shots were heard but did not find anything significant. LCSO deputies searched the immediate area, but ultimately cleared the call for service based upon the fact that they were unable to locate a crime scene.

8. On Tuesday, April 10, 2018, at 7:14 a.m., the LCSO received a 911 call in reference to a deceased person found at 9351 Corkscrew Road, Estero, Florida, a commercial plaza adjacent to the area in which LCSO deputies responded eight hours earlier for the shots-fired calls for service. Upon arrival at the scene, deputies found a red GMC truck, with multiple gunshot defects, parked in the middle of the plaza. During a cursory search of the immediate area, deputies located an obviously deceased male, suffering from multiple gunshot wounds, lying supine on the ground next to the front passenger side tire of the truck. The male decedent was later positively identified as S.L. Deputies also found a female decedent, likewise suffering from multiple gunshot wounds, sitting in the front passenger seat of the truck. The female decedent was later positively identified as D.L. A query of the truck's registration yielded an address in Brooksville, Florida, approximately a two-and-a-half hour drive north of the homicide scene, which was later determined to be the residence of S.L. and D.L.

9. Due to the nature of the scene, the LCSO's Homicide Unit responded and assumed the investigation. Upon arrival, homicide detectives conducted a walk-through of the scene, noting that on the ground adjacent to S.L. was a brown leather wallet, a Florida Driver's License belonging to S.L., and a bill of sale for a firearms transaction. Based upon the trajectory and precision of the shot groupings at the scene, it appeared that the shooting was perpetrated by at least two suspects; one suspect fired from the rear into the passenger side of the truck where D.L. was



seated, and the other suspect fired towards the front passenger side of the truck where S.L. was located.

10. The LCSO's Forensics Unit also responded to assist with documenting the scene, and processing and collecting the evidence. During processing of the scene, Crime Scene Technicians (CSTs) collected upwards of sixty-three spent shell casings to include .9mm and LC 17 rifle casings.

11. On April 11, 2018, at approximately 8:30 a.m., a doctor with the Medical Examiner's Office performed postmortem examinations on both S.L and D.L. During the examination, the doctor noted that S.L. was shot approximately seven times, with multiple gunshot wounds mostly to the head and to the lower body. The doctor recovered three projectiles from S.L. during the autopsy examination. Additionally, the doctor noted that D.L. was shot approximately eleven times with multiple gunshot wounds to the head, neck, and abdomen. The doctor recovered ten projectiles from D.L. during the examination. The doctor subsequently ruled the causes of death for S.L. and D.L. as homicide from multiple gunshot wounds.

***b. Forensic Examination of Cellular Activity***

12. During the preliminary investigation, a cellular telephone belonging to S.L. was located at the crime scene. After a search warrant was obtained for the electronic contents of the cellular telephone, the contents were downloaded by a LCSO Digital Forensics Specialist. Detectives reviewed the download of the cellular telephone and determined that S.L. and D.L. left Brooksville, Florida just after 7:00

p.m. on April 9, 2018, and traveled down Interstate 75 to the location of the murders. A review of the download indicated that S.L. and D.L. had traveled to Estero for the purpose of meeting least one individual to purchase firearms listed for sale on an Internet website called ARMSLIST. Specifically, a text message thread showing communication between S.L.'s cellular telephone and a cellular telephone number believed to be used by the suspect(s) was initiated on April 9, 2018, at approximately 12:10 a.m., in response to an ARMLIST posting listing a number of firearms for sale.

13. Further investigation revealed that S.L. was regularly engaged in the buying and re-selling of real and personal property for profit, otherwise known as "flipping," and had intended to purchase these firearms and re-sell them for a profit. On the day of the homicides, S.L. withdrew \$3,000.00 in U.S. currency from his bank account and had brought the currency with him to Estero to purchase the firearms advertised for sale on the above-referenced ARMSLIST posting, which included the following: (One) Gen 4 Glock 17, (One) Gen 3 Glock 17, (One) Gen 3 Glock 17 with Swenson side treaded (One) barrel, (One) Gen 4 Glock 19, (One) G3HK91 Clone – Federal Arms, (One) Uzi Pistol .9mm – Group Industries, (Four) AR15 5.56 11in Pistol Uppers, (Four) AR15 Lower – Complete Wilson Combat, and (One) Star Pistol .9mm.

14. Based on Detectives' review of S.L.'s cellular telephone communications, it appeared as though the suspect(s) traveled to Estero from out of

the area, and changed the location of the meeting with S.L. and D.L. several times prior to luring S.L. and D.L. to the dark and secluded parking lot at 9351 Corkscrew Road. Based on the contents of S.L.'s cellular telephone, as well as a neighborhood canvass that included the callers who had initiated the 911 shots-fired calls-for-service, it is believed that the armed robbery and murders of S.L. and D.L. occurred at approximately 10:55 p.m. on April 9, 2018.

*c. Text Message Communications*

15. Starting at approximately 12:10 a.m. on April 9, 2018, in the early morning hours of the day of the murders, S.L. began communicating by text message with cellular telephone number (786) 747-9856, which was the contact telephone number listed in the above-referenced ARMSLIST posting. The following is a timeline and summary of the text communications between S.L. the individual(s) using cellular telephone number (786) 747-9856:

<p><b>April 9, 2018 – Early morning hours of day of homicide</b></p>
--

12:10 a.m.: A text message was sent from S.L.'s cellular telephone to the suspect cellular telephone (786) 747-9856 inquiring about the availability of the firearms.

12:15 a.m.: A multimedia message from the suspect's cellular telephone to S.L.'s cellular telephone depicting photographs of the guns to purportedly be sold.

1:04 a.m.: A text message was sent from S.L.'s cellular telephone to the suspect's cellular telephone relaying that S.L. could pay cash or with an Oris watch.

1:05 a.m.: A text message from the suspect's cellular telephone to S.L.'s cellular telephone indicated not being interested in the watch.

1:08 a.m.: A text message from the suspect's cellular telephone to S.L.'s cellular

telephone indicated the suspect would take \$3,000 if S.L. would meet now as the suspect would be driving from Naples.

1:10 a.m.: A text message was sent from S.L.'s cellular telephone to the suspect's cellular telephone asking the suspect to call S.L. later in the day.

1:11 a.m.: A text message from the suspect's cellular telephone to S.L.'s cellular telephone relayed that the suspect works from 2p to midnight in Naples.

1:14 a.m.: A text message from the suspect's cellular telephone to S.L.'s cellular telephone indicated that the suspect told S.L. his name was Jeremy.

<b>April 9, 2018 – Morning into afternoon hours of day of homicide</b>
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10:08 a.m.: A text message from the suspect's cellular telephone to S.L.'s cellular telephone that the meeting location will be at 1921 David Blvd, IHOP.

1:59 p.m.: A text message from the suspect's cellular telephone to S.L.'s cellular telephone indicating that he's (the suspect) going to meet someone else for a \$5,000 deal.

2:10 p.m.: A text message was sent from S.L.'s cellular telephone to the suspect's cellular telephone, "I have cash on hand, mine is a sure deal."

3:05 p.m.: A text message was sent from S.L.'s cellular telephone to the suspect's cellular telephone, "did you sell?"

6:38 p.m.: A text message from the suspect's cellular telephone to S.L.'s cellular telephone, "no, he just flaked on me, we cold (sic) meet".

6:41 p.m.: A text message was sent from S.L.'s cellular telephone to the suspect's cellular telephone in which S.L. indicates that he (S.L.) will call him.

6:59 p.m.: A text message was sent from S.L.'s cellular telephone to the suspect's cellular telephone indicating the meeting location would be the Pilot Travel Center in Punta Gorda.

7:00 p.m.: A text message from the suspect's cellular telephone to S.L.'s cellular telephone, "okay."

7:12 p.m.: S.L. and D.L. left Brooksville to travel to meet for the firearms transaction.

8:32 p.m.: A text message from the suspect's cellular telephone to S.L.'s cellular

telephone indicates that he (suspect) ran into bad traffic and “we should arrive 10:45p-11p”.

8:39 p.m.: A text message was sent from S.L.’s cellular telephone to the suspect’s cellular telephone indicating that S.L. should arrive at 9:45 p.m.

9:25 p.m.: A text message from the suspect’s cellular telephone to S.L.’s cellular telephone asked if S.L. could meet closer to Naples.

9:42 p.m.: A text message was sent from S.L.’s cellular telephone to the suspect’s cellular telephone asking to meet at Loves Travel Shop in North Fort Myers, Exit 143 off of Interstate 75.

10:03 p.m.: A text message from the suspect’s cellular telephone to S.L.’s cellular telephone indicates that he (suspect) doesn’t live in Naples and only works there. The text message indicates that he’s already been on the road 5 hours because he had to drive to Miami and tells S.L. there’s a church in Estero. The address of 21115 Design Parc Lane was sent.

10:37 p.m.: S.L.’s cellular telephone called the suspect’s cellular telephone.

10:44 p.m.: A text message was sent from S.L.’s cellular telephone to the suspect’s cellular telephone that read, “I’m at the church.”

10:44 p.m.: S.L.’s cellular telephone called the suspect’s cellular telephone.

10:55 p.m.: The LCSO received the 911 shots fired calls.

After 10:55 p.m., there were no further communications from S.L.’s cellular telephone.

*d. The ARMSLIST Posting*

16. On April 11, 2018, a subpoena was served to ARMSLIST in an effort to obtain any information behind the creator of the posting to assist with identifying persons of interest. The ARMSLIST results provided the following information: the posting, labeled Post #8204183, was created on April 7, 2018, in Miami-Dade, Florida, and was associated with an email address: [jeremygb8441@gmail.com](mailto:jeremygb8441@gmail.com).

17. Detectives then served a search warrant on Google for information related to the Gmail email address, to include obtaining Internet Protocol (IP) addresses associated with the Gmail account, along with any information that may lead to a residence or identify a suspect. The results showed an IP address associated with the Gmail account in the middle of the bay area of Miami, Florida, the same area that the ARMSLIST posting was created. The result also provided some email records in which the user of jeremygb8441@gmail.com contacted several yacht brokers in the Miami area in order to set up a meeting to view expensive yachts. The emails indicated the meetings to view the yachts were to take place on April 8, 2018.

18. Detectives determined that the telephone service provider (TSP) for cellular telephone number (786) 747-9856, which was used by the individual(s) facilitating the firearms transaction with S.L., was Tracfone Wireless. Tracfone Wireless cellular telephones are prepaid and do not require a subscriber's name. A search warrant was served upon the TSP for records pertaining to telephone number (786) 747-9856. The cellular telephone number was determined to be a Tracfone SIM card, on the AT&T network, sold through Walmart, as a "Bring Your Own Device" plan.

*e. Identification of Alex Jared ZWIEFELHOFER*

19. An additional search warrant for the suspect's cellular phone records for number (786) 747-9856 resulted in obtaining an International Mobile Equipment

Identity (IMEI) number<sup>1</sup> associated with the device used with the Tracfone SIM card (IMEI: 358533051468). Subpoena results from AT&T for IMEI: 358533051468 and the records for this device revealed the subscriber as Alex Jared ZWIEFELHOFER, a white male born in 1997, with email address [AZ4721@gmail.com](mailto:AZ4721@gmail.com). The records further confirmed that the day prior to the homicide, ZWIEFELHOFER was utilizing AT&T phone number (715) 404-0337, on the same IMEI device that was utilized by telephone number (786) 747-9856. An analysis of the records received from the TSP indicated that on April 7, 2018, at 9:40:35 p.m., someone removed the SIM card (which was associated with IMSI<sup>2</sup> number 310410034020606) clearly affiliated with phone number (715) 404-0337, and placed the Tracfone SIM card (which was associated with IMSI number 310410969230354), clearly affiliated with the suspect's cellular telephone number (786) 747-9856, inside the device that ZWIEFELHOFER was previously utilizing. Records for both ZWIEFELHOFER's personal cellular telephone number ((715) 404-0337) and (786) 747-9856 were then placed into CellHawk, a software program used to generate geolocations of cellular activity from specific cellular telephone towers in an area, ultimately revealing the approximate whereabouts

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<sup>1</sup> The IMEI number is useful to investigations in that it is a 15- to 17-digit code attached to a device that acts as a unique identifier as long as it is associated with a subscriber. The IMEI number associated with a particular device may then be tracked by use of cell towers and GPS coordinates revealing locations of an individual in possession of that device.

<sup>2</sup> IMSI stands for International Mobile Subscriber Identity.

of the device by way of “pings.” In doing so, it was determined during the time of the SIM card switch on April 7, 2018, at 9:40:35 p.m., ZWIEFELHOFER’s personal cellular telephone ((715) 404-0337) pinged at the same location as (786) 747-9856 did twenty minutes later, at 10:00:59 p.m. The location of both pings, in the same geolocation, placed the one common phone (IMEI: 358533051468) using the two different SIM cards in Miami, Florida.

20. S.L.’s cellular telephone records and the records for (786) 747-9856 were also entered into CellHawk. This revealed that both S.L.’s cellular telephone and (786) 747-9856 pinged near the homicide scene during the time of the shots fired call for service on April 9, 2018. Telephone records also showed that S.L.’s cellular telephone was used to make a short voice call to (786) 747-9856 at 10:46 p.m. Location data indicated that S.L.’s phone and (786) 747-9856 were pinging inside the homicide scene just prior to shots being heard.

21. LCSO detectives served a search warrant on Google and Facebook for ZWIEFELHOFER’s personal Gmail account, AZ4721@gmail.com, and Facebook account in order to determine with whom ZWIEFELHOFER was communicating leading up to, during the commission of, and after the homicide; what ZWIEFELHOFER’s search histories indicated; and any information further linking ZWIEFELHOFER to the armed robbery and murders of S.L. and D.L.



*f. Identification of Craig Austin LANG*

22. Upon receipt of the records from Google and Facebook, it was determined that ZWIEFELHOFER was communicating frequently, as well as making travel arrangements to Miami, Florida, with LANG. LANG was found to be using cellular telephone number (480) 678-7349, which records showed was in communication with ZWIEFELHOFER's personal cellular telephone number ((715) 404-0337). A search warrant was also served on LANG's TSP and Facebook account. Through further research into the social media and phone records, detectives discovered that ZWIEFELHOFER and LANG began their travels to Florida just prior to the homicides and ultimately traveled to Miami, Florida on April 5, 2018 (just four days prior to the armed robbery and murders). Through these records, detectives concluded that ZWIEFELHOFER and LANG would mainly communicate through Facebook Messenger.

23. Beginning around mid-March of 2018, Facebook Messenger messages showed that both ZWIEFELHOFER and LANG planned to travel to Florida together. During their communications, ZWIEFELHOFER and LANG discussed checking out a military surplus store in Miami, purchasing body armor, committing robberies, hotwiring and stealing boats and/or a yacht, escaping to South America or Ukraine and smuggling firearms and ammunition. ZWIEFELHOFER and LANG sent photographs of firearms back and forth to one another. Additionally, a message to ZWIEFELHOFER from LANG indicated they would have .9mm ammunition

with them as well as Glock 17 magazines. The Glock 17 is a semi-automatic handgun that fires .9mm ammunition; .9mm ammunition was found at the murder scene. Glock 17s were listed for sale on the ARMSLIST posting.

24. On March 20, 2018, LANG made comments on his Facebook account about the magazines his mother ordered arriving and that “She didn’t want us using shitty AR mags to kill Mexicans.”

25. LANG also made several comments on his Facebook account that his mother would be driving him from her residence in Surprise, Arizona, to North Carolina, where she was relocating. Beginning on or about March 24, 2018, LANG’s personal cellular telephone ((480)-678-7349) pinged through the State of Arizona, and pings showed LANG’s cellular telephone traveling down to Texas, through Louisiana, into Alabama, and over to North Florida. On April 4, 2018, LANG then communicated through Facebook that he had obtained a Greyhound bus ticket. Greyhound records showed that LANG was to depart at 6:00 a.m. on April 4, 2018 from Orlando, Florida and travel to Miami, Florida. An analysis of LANG’s phone pings show that his cellular telephone ((480)-678-7349) traveled as described above and placed him in the Orlando area during the time he was set to depart on the Greyhound bus for Miami.

26. ZWIEFELHOFER noted in his Facebook communications that he took a Greyhound bus from Minneapolis/St. Paul, Minnesota, and traveled to Miami on April 5, 2018. ZWIEFELHOFER was residing in Bloomer, Wisconsin, at the time of

his travel. Minneapolis/St. Paul is the nearest major metropolitan area to Bloomer, Wisconsin. An analysis of ZWIEFELHOFER's phone pings ((715) 404-0337) during this time period showed ZWIEFELHOFER's cellular telephone traveling through Wisconsin, Illinois (Chicago), Indiana, Kentucky, Tennessee (Nashville), down to Georgia (Atlanta) and into the North Florida area.

27. Detectives learned through a review of the records that ZWIEFELHOFER and LANG continued their communication during their bus travels, and on April 4, 2018, Facebook messages between ZWIEFELHOFER and LANG reflected their arrival times in Florida as well as coordination of their routes to make sure they were on the same bus once their stops placed them both in Florida.

28. On April 4, 2018, LANG communicated to ZWIEFELHOFER that he (LANG) was in possession of ammunition in his travel bag and was fearful the police K-9s at his bus stop were going to sniff it out. Later that day, phone pings and call detail records of ZWIEFELHOFER's and LANG's respective cellular telephones placed them together at 205 S. Tamarind Avenue, West Palm Beach, Florida, the location of the Greyhound Station. ZWIEFELHOFER's and LANG's communications then indicated they were on the same bus headed for their final destination: Miami, Florida.

29. Beginning on April 5, 2018, through the afternoon of April 9, 2018, prior to the (786) 747-9856 phone pings showing the travel from Miami to Estero, Florida, LANG's cellular telephone ((480) 678-7349) and ZWIEFELHOFER's cellular

telephone ((715) 404-0337), pinged frequently together in the vicinity of the La Quinta Inn, 7401 NW 36<sup>th</sup> Street, Miami, Florida. Records received from the La Quinta Inn showed that LANG checked into the hotel on April 5, 2018, at 7:12 a.m., and was assigned room 210 for two guests under reservation number 478789. The hotel records further revealed that LANG presented his photo identification, which was scanned during the hotel registration process by the manager, and that LANG provided his email address, his credit card for payment, and cellular telephone number as (480) 678-7349, matching the cellular telephone number he was in possession of during the timeframe leading up to the homicides. Photographs observed on both ZWIEFELHOFER and LANG's Facebook Messenger communications showed them wearing tropical shirts while taking "selfies" inside what appeared to be a hotel room with distinct purple, black, and white décor. LCSO detectives obtained an interior photograph of the La Quinta hotel room that LANG rented. The photograph of the hotel room rented by LANG matched the interior of the room depicted in the images posted by ZWIEFELHOFER and LANG on their Facebook accounts during the time period that the hotel room was rented to LANG.

30. Records show that on April 7, 2018, LANG's cellular telephone number ((480) 678-7349), ZWIEFELHOFER's personal cellular telephone number ((715) 404-0337) and the suspect number (786) 747-9856 (using one common IMEI), all pinged in the same location, placing the two telephones (the telephone using (480) 678-7349 and the telephone using (715) 404-0337 and later (786) 747-7349) at the La Quinta Inn.

I believe that during the evening of April 7, ZWIEFELHOFER removed the SIM card for number (715) 404-0337 from his personal cellular telephone and inserted the Tracfone SIM card for number (786) 747-9856, as the (786) 747-9856 number thereafter began to ping as it traveled alongside LANG's cellular telephone for the remainder of that day. The pings indicated that LANG's cellular telephone and (786) 747-9856 were pinging in the same area in Miami, including near an Army Surplus Store (previously referenced in ZWIEFELHOFER's and LANG's Facebook communications concerning them purchasing Ruck Sacks, ammunition, and body armor) as well as the Miami bay area, where various yachting businesses were located.

31. On April 8, 2018, LANG's cellular telephone pinged alongside (786) 747-9856 as the pings traveled towards the bay area again. Email records for the [jeremygb8441@gmail.com](mailto:jeremygb8441@gmail.com) account, which was associated with the ARMSLIST posting, show that this was the same day the individual(s) using that email address contacted several yacht brokers to meet for a boat tour.

32. Notably, LANG's Facebook records showed photographs posted to LANG's Facebook account that were an exact match of photographs sent by (786) 747-9856 to S.L.'s cellular telephone during the time they were communicating about the firearms transaction. One particular photograph depicted what appeared to be an Army green Glock Gen 3, which was listed as for sale on the ARMSLIST posting.

33. ZWIEFELHOFER's Google\_records showed he searched for the following key phrases during the timeframe that he and LANG were in Miami prior

to the SIM card switch and prior to the murders: Miami ARMSLIST, Classified Miami Handguns, Hotwire Boat Ignition Switch, Cheapest Hotels Miami, How to Smuggle Myself to South America, as well as multiple searches of videos to include a particular scene from a movie in which subjects were shown inside a vehicle and then ambushed by multiple shooters. A review of this video was important in that the homicide scene in Estero, Florida was consistent with the tactical approach of the shooters and the trajectory of the gunshots as depicted in the movie.

34. On April 9, 2018, both LANG's cellular telephone and (786) 747-9856 continued to ping together in the Miami area until later that evening. At approximately 7:00 p.m., (786) 747-9856 began to travel; LANG's cellular telephone was presumably turned off at this time as there was no call, text, or ping activity. At approximately 7:48 p.m., (786) 747-9856 began to ping as it traveled out of Miami and headed west towards Southwest Florida. A text message from (786) 747-9856 to S.L.'s cellular telephone at 8:48 p.m. read, "WE should arrive 10:45p-11:00p" (emphasis added). The (786) 747-9856 number continued to ping along Alligator Alley (the section of Interstate 75 between Broward County and Collier County) into Naples, arriving near the Corkscrew Road exit for Estero just before 10:00 p.m., approximately forty-five minutes before the scheduled meeting. S.L.'s cellular telephone pings coincide with the (786) 747-9856 pings as the phones traveled simultaneously to the scene of the homicide from their respective starting locations. A text message from (786) 747-9856 to S.L.'s cellular at 10:03 p.m. indicated that the final meet location

would be 21115 Design Parc Lane at a church in Estero. At 10:37 p.m., S.L.'s cellular telephone made a voice call to (786) 747-9856. Seven minutes later, S.L.'s cellular telephone sent a text message to (786) 747-9856: "I'm at the church." S.L.'s cellular telephone then made a voice call to (786) 747-9856 at 10:44 p.m., with the call lasting for only a few seconds. Nine minutes later, multiple 911 callers adjacent to this area heard a volley of gunfire and called 911. At 10:46 p.m., both (786) 747-9856 and S.L.'s cellular telephone pinged inside in the area of the homicide scene. Ten minutes after shots were heard, (786) 747-9856 pinged traveling southbound from the Estero exit near Bonita Beach Road, which was one exit south from the homicide scene. The (786) 747-9856 then showed a constant ping for approximately forty (40) minutes in that area before all activity and ping data ceased. S.L.'s phone had no further communications after the volley of gunfire.

35. In addition to the above, LCSO detectives have been able to corroborate through other evidence that ZWIEFELHOFER and LANG both traveled from their respective residences to Miami, Florida, and were together in Miami, Florida, during the relevant time frame. ZWIEFELHOFER's and LANG's Facebook communications also stated that they would be in possession of firearms in Miami and would commit robberies and kill a yacht owner, if necessary.

36. ZWIEFELHOFER's and LANG's personal cellular telephone call detail records also indicated that during the time period from April 5, 2018 through April 9, 2018, they were in communication with telephone numbers subscribed to by their

family, friends, and close associates, indicating that they (ZWIEFELHOFER and LANG) were the ones using their respective cellular telephones during this time period, and no one else.

37. As mentioned above, S.L.'s bank records reflect that he withdrew \$3,000 in U.S. currency on or about April 9, 2018, which was the final price agreed upon by S.L. and the individual(s) using (786) 747-9856 for the purported sale of the firearms listed on ARMSLIST. The \$3,000 in currency that S.L. and D.L. brought with them for the firearms transaction in Estero was not found at the scene, giving rise to probable cause that the murders were committed in furtherance of a robbery, which interfered with commerce by violence.

*g. Social Media*

38. Upon reviewing Facebook records related to ZWIEFELHOFER and LANG obtained via search warrants, LCSO detectives saw that ZWIEFELHOFER posted a partial photograph to his Facebook account of a Greyhound boarding pass dated April 2, 2018, indicating the location of origin to be Minneapolis, Minnesota, and the destination to be Miami, Florida. As noted above, Minneapolis is the closest major city to Bloomer, Wisconsin, where ZWIEFELHOFER was residing.

39. LCSO detectives also found in the records several photographs posted on April 6, 2018, just three days prior to the murders, of both ZWIEFELHOFER and LANG wearing "Hawaiian" style shirts. LANG appeared to take a "selfie" photograph wearing a white short-sleeve, button down t-shirt with navy and light blue



hibiscus flowers and leaves printed throughout. In the same photograph of LANG, in the background lying on the bed behind him, is a black "Hawaiian" style shirt containing yellow, pink, red, and green martini glasses. On the same date, a photograph of ZWIEFELHOFER was posted to ZWIEFELHOFER's Facebook page of ZWIEFELHOFER wearing the black "Hawaiian"-style martini glass shirt which was in the background of LANG's photograph. ZWIEFELHOFER sent this photograph to an associate with whom he was communicating with in reference to ZWIEFELHOFER being in Miami, Florida.

40. LCSO detectives were able to observe the room that LANG rented at the La Quinta Inn located at 7401 NW 36<sup>th</sup> Street, Miami, Florida. The room's interior décor appears to match the background of the photograph depicting ZWIEFELHOFER wearing the "Hawaiian"-style martini glass shirt sent via Facebook.

*h. Interview of Lang's Associate and Additional Travel Records*

41. On May 21, 2019, LCSO detectives traveled to a prison in Missouri where they interviewed an associate of LANG's (hereinafter referred to as M.S.M.). M.S.M. served in the U.S. Army with LANG. According to M.S.M., sometime around August of 2018, M.S.M. met LANG at a mutual friend's residence in St. Louis, Missouri. LANG told M.S.M. that LANG gunned down some people in Miami, Florida. LANG told M.S.M. that he had been in Florida with some guy who is from Wisconsin. LANG told M.S.M. that he and the other guy unloaded both of

their clips into the “dude’s” red truck. LANG showed M.S.M. a news article on LANG’s cellular telephone about a murder. LANG told M.S.M. that he and the other guy from Wisconsin traveled from Florida to Washington state after the shooting. M.S.M. told detectives that LANG told him that LANG had hidden two of the handguns used in the murder, a Glock 17 and Glock 19, in his mother’s house in North Carolina. M.S.M. advised that LANG later traded the handguns to an individual in North Carolina in exchange for the individual’s personal identification information. M.S.M. told detectives that M.S.M. was supposed to go to Miami with LANG to be part of a group that was to travel by boat overseas. M.S.M. did not go to Miami because M.S.M. was arrested on April 2, 2018 on an outstanding warrant. Upon M.S.M. being released from custody, he and LANG traveled together from Missouri to North Carolina in August 2018. M.S.M. and LANG later traveled separately to Bogota, Colombia. LANG told M.S.M. that LANG was going to join combat forces opposed to the Venezuelan government. M.S.M. advised that LANG was going to join a Venezuelan resistance group. M.S.M. told detectives the resistance group LANG joined was able to obtain firearms from law enforcement in Bogota. M.S.M. advised that the resistance group had a safe house in the mountains of Cucuta, Colombia. The group planned to cross into Venezuela and fight against the Venezuelan government. LANG got on a bus to travel to Cucuta for the purpose of traveling to Venezuela to engage in combat against the Government of Venezuela. According to M.S.M., he left LANG in Bogota because M.S.M. did not want to kill

people.

42. Based on my training and experience, I know that CBP maintains a database of travelers who enter the United States via international airports from foreign countries. This database also contains records of travelers who depart the United States from international airports for foreign countries. I also know that CBP has liaison relationships with certain foreign customs agencies and shares travel records with these agencies. A Homeland Security Investigations (HSI) SA provided information to me indicating that there was a record showing LANG departed Mexico City, Mexico, for Bogota, Colombia, on September 25, 2018. There was also a record that LANG thereafter departed from Colombia on November 23, 2018, for Madrid, Spain. HSI advised that the CBP has no record of LANG re-entering the United States after his departure from Mexico to Colombia.

43. The country of Venezuela is a sovereign nation located in South America. Venezuela borders Colombia to the west. Cucuta, Colombia, is a city in Colombia located near the border of Venezuela.

44. A LCSO Crime Analyst determined from a commercial database that LANG conducted a pawn transaction involving firearm receivers at Palace Jewelry and Loan, 1420 1<sup>st</sup> Avenue, Seattle, Washington, on May 23, 2018. At my request, FBI SAs in Seattle went to Palace Jewelry and Loan to interview employees and obtain records pertaining to this pawn transaction. On May 10, 2019, FBI SAs went to this location and determined that LANG sold three firearm receivers to Palace

Jewelry and Loan on May 23, 2018. LANG sold two lower rifle receivers and one upper rifle receiver. A lower rifle receiver connects to the upper receiver and includes the trigger group, buffer tube, magazine release, safety selector, bolt catch and all other necessary components. An upper rifle receiver is the part that consists of the barrel, forend, bolt carrier group and charging handle. The upper receiver attaches to the rifle's lower receiver to form a fully functional rifle. All of the receivers were 5.56 caliber. This caliber is consistent with the rifle rounds that were fired at the scene of the murders. In addition, FBI SAs determined that LANG sold 671 rounds of 5.56 caliber ammunition on May 23, 2018, to Palace Jewelry and Loan. The ammunition LANG sold was still at Palace Jewelry and Loan when FBI SAs interviewed employees. Palace Jewelry and Loan voluntarily turned the ammunition over to the FBI. The ammunition casings were stamped LC 17, which is the same stamp found on the expended rifle casings at the scene of the murders. Palace Jewelry and Loan sold the firearm receivers purchased from LANG to several different individuals. The FBI was able to locate the different purchasers in three different states. The three firearm receivers are now in the possession of law enforcement.

*i. Search of ZWIEFELHOFER's Residence*

45. While residing in Bloomer, Wisconsin, on March 25, 2019, ZWIEFELHOFER attempted to purchase a firearm by filling out a Bureau of Alcohol Tobacco and Firearms (ATF) Form 4473 during the attempted purchase at Tilden Gun, 12427 98<sup>th</sup> Avenue, Chippewa Falls, Wisconsin 54729.

ZWIEFELHOFER listed his Bloomer, Wisconsin address on the form. Based on ZWIEFELHOFER's response to question(s) on the form, on May 15, 2019, a federal grand jury in the Western District of Wisconsin indicted ZWIEFELHOFER for knowingly making a false statement and representation to Tilden Gun, in violation of 18 U.S.C. § 924(a)(1)(A), Case Number 3:19-cr-00057-jdp.

46. On May 21, 2019, United States Magistrate Judge Stephen L. Crocker, Western District of Wisconsin, authorized a search warrant for the search of ZWIEFELHOFER's residence in Bloomer, Wisconsin.

47. On May 23, 2019, FBI personnel executed the search warrant at ZWIEFELHOFER's residence. FBI personnel located a "Hawaiian"-style martini glass shirt located in ZWIEFELHOFER'S bedroom closet, which shirt appeared identical to the one worn by ZWIEFELHOFER in the selfie photograph that was most likely taken in a room located within the La Quinta Inn in Miami, Florida. FBI personnel also located a Dell Inspiron laptop computer on the floor of ZWIEFELHOFER's bedroom near the bed and seized it pursuant to the search warrant. The Dell Inspiron laptop was logged into evidence in the FBI's Milwaukee Office, then sent to the FBI's office in Tampa, Florida, and then onto the FBI's Office in Fort Myers.

48. After his arrest, law enforcement officers transported ZWIEFELHOFER to the Eau Claire, Wisconsin Police Department, where I and LCSO Detective Sarah Rodriguez met with ZWIEFELHOFER in an interview

room and advised ZWIEFELHOFER of his rights under U.S. law prior to interviewing him. The interview was recorded by a video recording system. ZWIEFELHOFER freely and voluntarily provided the following information to me and Detective Rodriguez: In 2016, ZWIEFELHOFER traveled to the Ukraine to fight as a combatant for a foreign paramilitary group in the Eastern part of the Ukraine. There, ZWIEFELHOFER met LANG as LANG was in the Ukraine fighting for this same paramilitary group. In 2017, ZWIEFELHOFER traveled with LANG to Africa, where they were detained by authorities in South Sudan before being turned over to Kenyan authorities and both were eventually deported to the United States. ZWIEFELHOFER admitted to traveling to Florida from Minnesota via Greyhound bus in April of 2018. ZWIEFELHOFER also advised that LANG traveled from Arizona to Florida in April of 2018. ZWIEFELHOFER stated that he and LANG met in Florida and the two traveled aboard a Greyhound bus bound for Miami, Florida. LANG brought firearms, firearm magazines and ammunition with him from Arizona. ZWIEFELHOFER advised that he and LANG had planned to take a boat from Miami to Venezuela to fight the Venezuelan government. LANG transported the firearms and ammunition with him from Arizona for ZWIEFELHOFER and LANG to use in combat in Venezuela. ZWIEFELHOFER indicated he and LANG intended to shoot communists in Venezuela.

49. ZWIEFELHOFER further advised that he and LANG stayed at the La Quinta Inn in Miami, and that LANG had rented a room for them at the La Quinta

Inn. ZWIEFELHOFER indicated that the two ran out of money after a short period of time and could no longer afford the room at the La Quinta Inn. ZWIEFELHOFER stated that he and LANG had to leave the motel and stay overnight in a public dog park in Miami. ZWIEFELHOFER advised that the park's sprinkler system came on while the two were in the park causing ZWIEFELHOFER's cellular telephone to become wet. ZWIEFELHOFER stated that his cellular telephone was damaged by the water, so he went to a Walmart in the Miami area and obtained another cellular telephone. ZWIEFELHOFER could not recall the telephone number of the cellular telephone he brought with him to Florida from Wisconsin. ZWIEFELHOFER also could not recall the telephone number of the cellular telephone he purchased in Miami. However, ZWIEFELHOFER denied traveling to Southwest Florida during his stay in Florida in April of 2018. ZWIEFELHOFER advised that he had communicated with LANG since returning to Wisconsin after having traveled to Florida. ZWIEFELHOFER admitted to using the email address, AZ4721@gmail.com in the past. ZWIEFELHOFER claimed he was locked out of this email account some time ago and had not been able to use it.

50. On May 23, 2019, LCSO detectives and an FBI TFO interviewed J.Z. in Bloomer, Wisconsin, with whom ZWIEFELHOFER was residing. J.Z. voluntarily provided the following information: ZWIEFELHOFER returned to Bloomer after being released from jail in North Carolina. ZWIEFELHOFER left Bloomer and went to Florida with his friend "Craig." ZWIEFELHOFER, "Craig"

and others were supposed to take a boat to Venezuela to fight in combat.

ZWIEFELHOFFER's and "Craig's" plan to travel to Venezuela and fight in combat did not work out because the boat captain got murdered.

*j. Bank and Rental Car Records*

51. I obtained records from Bank of America pertaining to a checking account number ending in 6026 held by LANG. The debit card number associated with this account ended in 1022. I noted a debit card transaction dated April 7, 2018, for Inveradrian Rent a Car, Miami, Florida, in the amount of \$165.00, as well as a debit card transaction dated April 7, 2018, in the amount of \$53.88, at a Walmart store located at 8651 Northwest 13<sup>th</sup> Terrace, Doral, Florida, which is located approximately three miles from the La Quinta Inn, 7401 NW 36<sup>th</sup> Street, Miami.

52. On May 30, 2019, an FBI TFO and LCSO detectives went to Miami and obtained records from Inveradrian Rent a Car, including a Rental Agreement indicating that LANG rented a Toyota Corolla, Florida license plate number DIY-U73 on April 7, 2018, and returned it on April 10, 2018. The rented Toyota Corolla was delivered to LANG at the La Quinta Inn, 7401 NW 36<sup>th</sup> Street, Miami. On May 31, 2019, I met with an employee of Inveradrian Rent a Car in Miami and observed the Toyota Corolla, Florida license plate number DIY-U73. The Toyota Corolla was a four-door car and red in color. I observed that there was a SunPass transponder, with transponder number 1467345801, affixed to the interior windshield of the Toyota Corolla. Inveradrian Rent a Car confirmed that this same SunPass



transponder was in the red Toyota Corolla during the time period that the car was rented to LANG in April 2018.

53. I then obtained records from the Florida Department of Transportation (FDOT) for the aforementioned SunPass transponder and red Toyota Corolla. The records indicate that the aforementioned SunPass transponder and Toyota Corolla traveled on Everglades Parkway West (Interstate 75-Alligator Alley Westbound) on April 9, 2018, at 7:57 p.m. The FDOT records indicate the aforementioned SunPass transponder and Toyota Corolla traveled on Everglades Parkway East (Interstate 75-Alligator Alley Eastbound) on April 9, 2018, at 11:59 p.m. The murders of S.L. and D.L are believed to have been committed on April 9, 2018, at approximately 10:55 p.m. The times and locations of the cellular telephone pings for the suspect phone number (786) 747-9856 on April 9, 2018, as described in detail above in this affidavit, are consistent with the times and locations of travel depicted in the SunPass transponder records.

54. I also obtained records from Walmart related to the purchase made on April 7, 2018, at the Walmart in Doral, Florida, in the amount of \$53.38, with the debit card number associated with LANG's Bank of America account. Walmart provided records indicating this debit card was used to purchase a Tracfone SIM card, Phone Card Activation number 8407980000002008315755, on April 7, 2018, at 7:38 p.m. at the Walmart store located in Doral, Florida.

55. Records that I obtained from Tracfone Wireless showed that the SIM

card associated with telephone number (786) 747-9856 is the Tracfone SIM card purchased with LANG's debit card at the Walmart in Doral on April 7, 2018, as the Serial Mobile PIN Number matches the last ten digits of the Phone Card Activation number (2008315755) indicated in the Walmart records.

56. Further, the electronic stored data on the Dell Inspiron laptop computer that was recovered from ZWIEFELHOFER's bedroom during the search warrant was examined by an FBI Computer Analysis Response Team Field Examiner (FE) pursuant to the search warrant. Within the Dell Inspiron laptop computer, the FE found electronic stored data that indicated the computer was used to create ARMSLIST posting #8204183 on April 7, 2018. The electronic stored data also indicated that the name "ALEX ZWIEFELHOFER" was searched numerous times using the Internet search site Google, and that someone used the computer to access a Facebook account in the name of Jeremy Goldstein. The profile picture of the "Jeremy Goldstein" Facebook account is a photograph of ZWIEFELHOFER, the background of which appears to be the La Quinta Hotel room where he and LANG stayed in Miami. Among other things, the electronic stored data of the Dell Inspiron laptop computer also showed that someone drafted a book about "CRAIG's" life, which mentioned travel to the Ukraine.

*k. Recent interviews*

57. On July 1, 2019, I interviewed D.K. in Buckhannon, West Virginia. D.K. was friends with LANG and ZWIEFELHOFER. D.K. had conversations with

LANG and ZWIEFELHOFER via Facebook messenger in 2018. LANG asked D.K. to travel to Miami and then onto Venezuela to engage in military combat. D.K. did not travel to Miami. In May or June of 2018, D.K. saw LANG and ZWIEFELHOFER in-person in Raleigh, North Carolina. During this meeting D.K. learned that LANG planned to steal a boat in Miami and to travel to Venezuela. D.K. advised that LANG later asked D.K. to travel to Colombia to fight in combat in Venezuela. D.K. declined LANG's invitation.

58. On July 30, 2019, FBI agents interviewed E.Z. in Bellport, New York. E.Z. had traveled to the Ukraine in 2016 where he met LANG in-person. E.Z. was in the Ukraine for a short period of time. E.Z. thereafter maintained contact with LANG via social media. E.Z. was acquainted with ZWIFELHOFER through social media. E.Z. had conversations with LANG and ZWIFELHOFER via Facebook messenger in 2018 during which LANG solicited E.Z. to come to Miami in order to travel to Venezuela. The purpose for the travel to Venezuela was to engage in military combat against the Venezuelan Government. E.Z. was going to be a "spotter" for ZWIEFELHOFER who was going to be a sniper. E.Z. booked a flight to Miami but then canceled it the next day. E.Z. provided a copy of a document indicating E.Z. booked a flight to Miami for April 4, 2018. E.Z. provided agents with copies of Facebook messenger conversations he had with LANG in February and March of 2018. The conversations discussed traveling to Venezuela. On March 6, 2018, LANG indicated to E.Z. that LANG would be bringing 12 extra handguns

and 20 rifles.

59. On September 26, 2019, FBI agents interviewed F.H. in Okaloosa County, Florida. F.H. is LANG's half-sister. F.H. advised that LANG came to her residence in Okaloosa County in late March of 2018. LANG had a rifle and two handguns with him. LANG had lots of ammunition with him as well. LANG left F.H.'s residence about two weeks later. LANG told F.H. he was going to Miami to meet a buddy and then they were going to travel to Venezuela. LANG told F.H. that he was going to Venezuela to fight the Venezuelan Government. In 2019, LANG sent F.H. a link to a news article about two murders in "Estero" or advised her to look up the news article using the word, "Estero." LANG indicated to F.H. he killed the people mentioned in the article.

60. On October 7, 2019, FBI agents interviewed A.K. at the United States Embassy in Kyiv, Ukraine. A.K. is a United States citizen living in the Ukraine. A.K. met LANG and ZWIEFELHOFER in the Ukraine in 2017. In December of 2018, A.K. met with LANG in-person in the Ukraine. LANG told A.K. he was in Miami from March to May of 2018. LANG told A.K. that he was trying to get to Venezuela from Miami. LANG told A.K. that LANG made a posting on Armslist to lure someone to rob them to get money to go to Venezuela. LANG told A.K. that LANG and ZWIEFELHOFER murdered an older male and female couple during the course of the robbery. LANG told A.K. that LANG shot the male as he was getting out of his vehicle and then stood over him and shot him again. LANG told

A.K. that the female who was in the vehicle fired a round from inside the vehicle which struck the glass of the vehicle. The round then hit LANG in the shoulder. LANG told A.K. the round did not penetrate his shoulder because the round was a hollow point and expanded as it went through the glass.

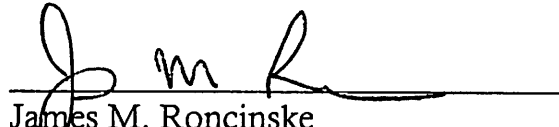
61. On November 18, 2019, I spoke with D.A.K. who was in Massachusetts. D.A.K. traveled to the Ukraine in 2016 where he met LANG. D.A.K. was in the Ukraine for about five months before returning home to Georgia. D.A.K. maintained contact with LANG after D.A.K. returned to the United States. D.A.K. resided in Georgia in 2018. In late April of 2018, LANG contacted D.A.K. via telephone and told D.A.K. that he was in the Atlanta, Georgia, area and needed a place to stay. D.A.K. allowed LANG and man named Alex to stay with him for a few days. D.A.K. later learned Alex's last name was ZWIEFELHOFER. LANG told D.A.K. that LANG and ZWIEFELHOFER had been in Miami trying to obtain a boat to leave the country. LANG told D.A.K. that they were not able to obtain boat and some "deal" had gone bad in Miami. LANG and ZWIEFELHOFER showed D.A.K. a news article about some crime and implied they were responsible. LANG had a 5.56 caliber rifle with him and .9mm Glock 17 semi-automatic handgun with him. 5.56 caliber rifle casings and .9mm caliber casings were found at the scene of the murders. The .9mm casings were consistent with having been fired from a Glock handgun. D.A.K. thought ZWIEFELHOFER had a pistol. D.A.K. observed LANG had a brief case with him that was full of cash. LANG tried to

convince D.A.K. to travel overseas with him to engage in military combat, D.A.K. declined. D.A.K knew LANG traveled to Colombia. D.A.K heard LANG make comments about wanting to overthrow the Venezuelan Government.

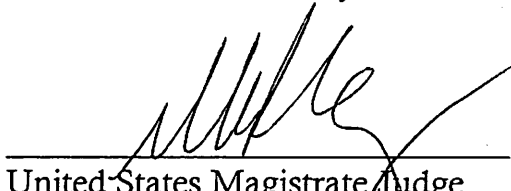
*1. The United States was at peace with the Bolivarian Republic of Venezuela*

62. The United States Constitution grants the United States Congress the sole power to declare war. The United States was at peace with the Venezuela in 2018.

I swear under penalty of perjury that the foregoing is true and correct.

  
James M. Roncinske  
Special Agent, Federal Bureau of Investigation

Signed and sworn to before me this 10<sup>th</sup> day of December, 2019 in Fort Myers, Florida

  
United States Magistrate Judge  
Middle District of Florida  
Fort Myers Division



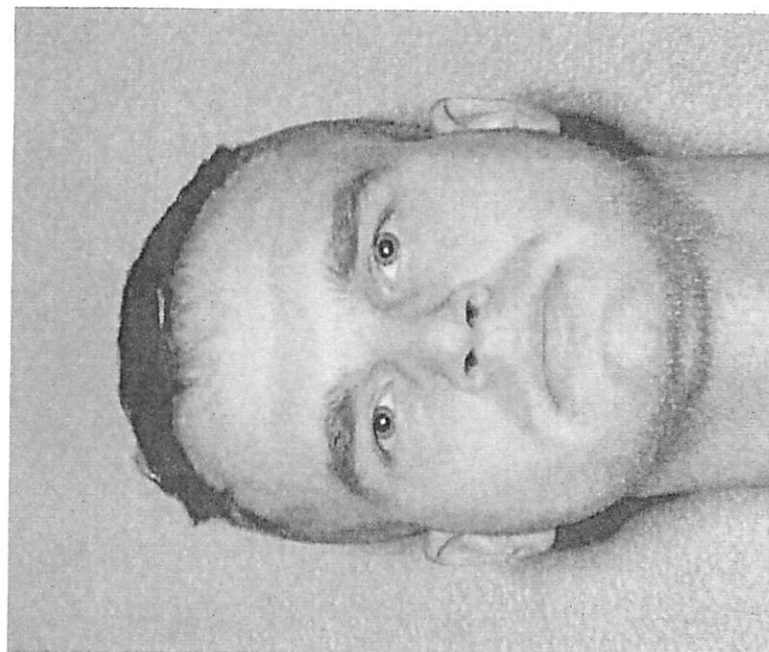
ATTACHMENT A



Photograph from  
Lang's Facebook  
account posted on  
6-21-2019



Photograph  
from Virginia  
Identification  
Card taken on  
08-31-2018



Photograph from  
Arizona Driver's  
License photograph  
dated  
01-31-2017

Rec 12/11/19

@ 4:45 pm - JC