

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

LONNIE LEROY COFFMAN

Case No.: -21-cr-_____

26 U.S.C. §§ 5861(d), 5841, 5845, 5871

STATEMENT OF OFFENSE

Pursuant to Federal Rule of Criminal Procedure 11, the United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the defendant, Lonnie Leroy Coffman, with the concurrence of his attorney, agree and stipulate to the below factual basis for the defendant’s guilty plea—that is, if this case were to proceed to trial, the parties stipulate that the United States could prove the below facts beyond a reasonable doubt:

1. On January 6, 2021, a joint session of the United States Congress was scheduled to convene at the United States Capitol, in Washington, D.C., to certify the vote count of the Electoral College of the 2020 Presidential Election, which had taken place on November 3, 2020.

2. At around 9:15 a.m. that morning, the defendant parked his red GMC Sierra pickup truck in the 300 block of First Street, in Southeast, Washington, D.C. The defendant had driven the pickup truck from his home state of Alabama to the Washington, D.C., area several days earlier.

3. The pickup truck contained several loaded firearms within arms-reach of the driver’s seat, including: (a) a 9mm Hi-Point handgun in the front right passenger seat; (b) a Windham Weaponry rifle; and (c) a Hatfield Gun Company SAS shotgun.

4. Also inside the pickup truck and in its covered bed were hundreds of rounds of ammunition, large-capacity ammunition feeding devices, a crossbow with bolts, machetes,

camouflage smoke devices, a stun gun, cloth rags, lighters, a cooler containing eleven mason jars, and other items.

5. The eleven mason jars in the cooler each had a hole punched in the lid, and each hole was filled with a golf tee. Each mason jar contained a mixture of gasoline and Styrofoam. The mason jars and their contents, lighters, and cloth rags made up the component parts of Molotov cocktails, a term for a bottle-based improvised incendiary weapon. These items constituted a combination of parts designed or intended for use in converting any device into a “destructive device” as that term is defined in 26 U.S.C. § 5845(f).

6. Twelve additional mason jars were later discovered at the defendant’s residence, 19 Bell Springs Road, in Falkville, Alabama. These mason jars each had a hole punched in the lid and contained gasoline. Nine of these jars contained a material consistent with polystyrene (from which Styrofoam is made), in addition to the gasoline. The mason jars and their contents made up the component parts of Molotov cocktails, a term for a bottle-based improvised incendiary weapon. These items constituted a combination of parts designed or intended for use in converting any device into a “destructive device” as that term is defined by 26 U.S.C. § 5845(f). The defendant made these items at some time prior to his departure from Falkville, Alabama, bound for Washington, D.C. He left Falkville on or about January 1, 2021.

7. The defendant had not registered any firearms or destructive devices in the National Firearms Registration and Transfer Record.

8. The defendant did not seek or obtain a license to carry a pistol in the District of Columbia.

9. The defendant knowingly possessed the destructive devices described in paragraph six in the Northern District of Alabama on or about January 1, 2021.

Respectfully submitted,


Prim F. Escalona
United States Attorney

By: /s/ Henry Cornelius
Henry Cornelius
Assistant United States Attorney

DEFENDANT'S ACKNOWLEDGMENT

I, Lonnie Leroy Coffman, have read this Statement of the Offense and have discussed it with my attorney. I fully understand this Statement of the Offense. I agree and acknowledge by my signature that this Statement of the Offense is true and accurate. I do this voluntarily and of my own free will. No threats have been made to me nor am I under the influence of anything that could impede my ability to understand this Statement of the Offense fully.

Date: 9-22-21

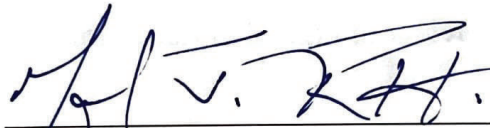


Lonnie Leroy Coffman
Defendant

ATTORNEY'S ACKNOWLEDGMENT

I have read this Statement of the Offense and have reviewed it with my client fully. I concur in my client's desire to adopt this Statement of the Offense as true and accurate.

Date: 9-22-21



Manuel Retureta, Esq.
Attorney for Defendant