

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>Case No: 1:21-cr-00004 (CKK)</b>
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	:	<b>26 U.S.C. §§ 5861(d), 5841, 5845(f), 5871</b>
	:	
<b>v.</b>	:	<b>22 D.C. Code § 4504(a)</b>
	:	
<b>LONNIE LEROY COFFMAN,</b>	:	
	:	
<b>Defendant.</b>	:	
	:	

**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. The defendant exited his pickup truck at around 9:20 a.m., and walked in the direction of the U.S. Capitol Building, and towards a rally planned for that morning near the National Mall in Washington, D.C.

7. As the defendant walked in Washington, D.C., that morning and throughout the day, he knowingly carried on his person two additional loaded firearms, both classified as pistols because they were designed to be fired by use of a single hand and had a barrel less than 12 inches in length: (a) a 9mm Smith & Wesson handgun; and (b) a .22 caliber North American Arms revolver.

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

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

10. The defendant knowingly possessed the firearms and destructive devices in the District of Columbia on January 6, 2021.

Respectfully submitted,

CHANNING D. PHILLIPS  
Acting United States Attorney  
D.C. Bar No. 415793

By: /s/ Michael J. Friedman  
Michael J. Friedman  
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

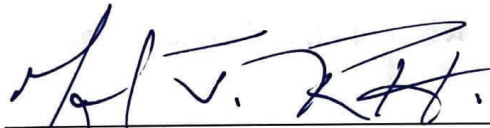


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Lonnie Leroy Coffman  
Defendant

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

  
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Manuel Retureta, Esq.  
Attorney for Defendant