

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

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
<b>v.</b>	:	<b>Case No.: 21-mj-00011 (GMH)</b>
	:	
<b>LONNIE LEROY COFFMAN,</b>	:	
	:	
<b>Defendant.</b>	:	

**MEMORANDUM IN SUPPORT OF PRETRIAL DETENTION**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully submits this memorandum in support of pretrial detention.

**A. BACKGROUND**

On the morning of January 6, 2021, defendant Lonnie Leroy Coffman parked his Red GMC Sierra pickup truck in the 300 block of First Street, Southeast, Washington, D.C, at around 9:15 a.m. (Exhibit A at 3.) The pickup truck was registered to the defendant in Alabama. It was parked a few blocks away from the U.S. Capitol Building, where a throng would soon gather and illegally force its way inside to disrupt constitutionally-required proceedings critical to our nation's democratic process. The defendant got out of his pickup truck at around 9:20 a.m., and walked directly towards the U.S. Capitol Building with a crowd of people (surveillance images attached as Exhibit B).

The pickup truck was parked near the Republican National Club, and a few blocks from the Democratic National Committee Headquarters. Law enforcement responded to the locations of both of those political organizations a few hours later for reports of explosive devices there. (Exhibit A at 1.)

While responding to the reports of explosive devices in the area, United States Capitol Police (“USCP”) officers saw the handle of a firearm on the front right passenger seat of the defendant’s truck. Law enforcement recovered a loaded 9mm Hi-Point handgun from the front right passenger seat, and proceeded to conduct a search of the rest of the defendant’s pickup truck. The search revealed that the defendant had a large and unlawful collection of weapons in the pickup truck. Items recovered included: (a) the loaded 9 mm Hi-Point handgun; (b) a loaded Windham Weaponry rifle; (c) a loaded Hatfield Gun Company SAS shotgun; (d) several large-capacity ammunition feeding devices loading with more than ten rounds of rifle ammunition; (e) hundreds of rounds of ammunition; (f) a crossbow with bolts; (g) several machetes; (h) camouflage smoke devices; (i) stun gun; (j) 11 mason jars containing a flammable liquid, with a hole punched in the top of each jar; (k) lighters and rags; and (l) other items. (Photos attached as Exhibit C.)

The defendant returned to the pickup truck at around 6:30 p.m. that evening, and affirmed to law enforcement that it was his pickup truck (Exhibit A at 2). The defendant told law enforcement that he had been trying to get back to the pickup truck throughout the day, but that he was turned away in light of the explosives investigations. The defendant told law enforcement that the mason jars inside the pickup contained a mixture of melted Styrofoam and gasoline. (*Id.* at 3.) This combination creates an explosive mixture that has the effect of napalm, in that the flammable mixture can stick to objects and continue burning. (*Id.*) The Bureau of Alcohol, Tobacco, and Firearms concluded that the eleven mason jars and related items were parts designed to create a Molotov cocktails, a dangerous incendiary explosive. (*Id.* at 2.)

The defendant was also carrying two additional loaded firearms – a 9mm Smith & Wesson handgun, and a .22 caliber North American Arms revolver. (Photos attached as Exhibit D.) The

defendant's wallet contained cards advertising firearm and pawn shops, and a document purporting to be a license to carry a pistol in his home State of Alabama. The defendant had no legal authority to possess or carry any firearms or destructive devices in the District of Columbia. The defendant was placed under arrest.

The search of the defendant's pickup truck contained concerning handwritten messages that raise alarm in the context of the January 6 rioting and criminal infringement on our nation's democratic process. One was a handwritten note with words purportedly attributed to Abraham Lincoln – "We The People Are The Rightful Masters Of Both The Congress And The Courts, Not To Overthrow The Constitution But To *Overthrow The Men Who Pervert The Constitution*" (emphasis added). The note also contained information about elected representatives (describing one as purportedly Muslim) and describing a judge as a "bad guy." Another set of handwritten messages were found on the back of a magazine, and contained purported contact information for "Conservative Talk Show Host Mark Levin," "Shaun [sic] Hannity," and "Senator Ted Cruz." (Photos attached as Exhibit E.)

The defendant told law enforcement that he resided in Alabama, and had been living out of his truck in the D.C. area for around the past week.

On January 11, 2021, the grand jury returned a 17-count indictment charging the defendant with Possession of an Unregistered Firearm – Destructive Device (26 U.S.C. Section 5861(d)), three counts of Carrying a Pistol Without a License (22 D.C. Code Section 4504(a)), two counts of Carrying a Rifle or Shotgun (22 D.C. Code Section 4504(a-1)), Possession of a Large Capacity Feeding Device (7 D.C. Code Section 2506.01(b)), five counts of Possession of an Unregistered Firearm (7 D.C. Code Section 2502.01(a)), and five counts of Unlawful Possession of Ammunition

(7 D.C. Code Section 2506.01(a)(3)).

## **B. ARGUMENTS FOR DETENTION**

Pretrial detention is necessary to ensure the safety of people and the community, and the appearance of the defendant as required. 18 U.S.C. Section 3142(f). There is clear and convincing evidence that the defendant would pose a danger to the community if released, and that there are no release conditions or combination of conditions that would ensure the safety of the community. There is probable cause that the defendant would be a flight risk and would not appear at trial as required.

The nature and circumstances of the offense include that the defendant is charged with numerous felony offenses, including a federal felony that involves the possession of a firearm or destructive device (18 U.S.C. Section 3142(f)(1)(E)). The defendant possessed in his pickup truck a large collection of weapons in Washington, D.C., without authority, gravely endangering the community on a day of criminal rioting at the U.S. Capitol Building. The Molotov cocktail components were created so as to be particularly lethal, with a napalm substance inside that would stick to the target and continue to burn. The defendant had hundreds of rounds of ammunition, each of which could cost a human life. The pickup truck was parked in close proximity to the U.S. Capitol Building. And the handwritten messages in the defendant's pickup truck raise grave concerns about his intentions, and suggest that these weapons were intended to be used in an effort to violently attack our elected representatives.

The weight of the evidence is overwhelming, as the defendant admitted to law enforcement that the pickup truck was his, and had intimate knowledge of the contents. Two of the firearms were on the defendant's person in his pockets. The defendant's pickup truck was registered to



him in Alabama, and he carried the keys to the truck. No other individual (aside from law enforcement) accessed the pickup truck from the time the defendant parked it the morning of January 6.

The defendant has a concerning history and characteristics that raise grave risk that he would endanger the community and flee if released. The defendant does not reside in Washington, D.C., and we are unaware of any family in the area. He reported to law enforcement that he was living out of his truck in the days preceding the January 6 rioting. The defendant is not employed. And it is clear that he has access to firearms and other weapons, and carried in his wallet a license to carry a pistol in the State of Alabama.

In the end, this is a defendant with access to firearms and numerous other lethal weapons, dangerous incendiary mixtures creating napalm, who appears to have been motivated to conduct violence against our elected representatives. The defendant brought these weapons to the immediate vicinity of the U.S. Capitol Building, and traveled the area with two firearms on his person. The amount of weapons suggests an intent to provide them to others, as no one person could reasonably use so many at once. The nature and seriousness of the danger that the defendant would pose if released cannot be overstated. There are no conditions or combinations of conditions that would ensure the safety of the community and the defendant's appearance as required.

### **C. CONCLUSION**

For these reasons, and others presented at the detention hearing, the Court should order that the defendant be detained pending trial.

Respectfully submitted,

MICHAEL R. SHERWIN  
Acting United States Attorney  
New York Bar No. 4444188

By:           /MJF/            
MICHAEL FRIEDMAN  
Assistant United States Attorney  
New York Bar No. 4297461  
555 4<sup>th</sup> Street, N.W.  
Washington, D.C. 20530  
202-252-6765  
Michael.Friedman@usdoj.gov

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

On January 6, 2021, a joint session of the United States Congress convened at the United States Capitol, which is located at First Street, Southeast, in Washington, D.C. Specifically, elected members of the United States House of Representatives and the United States Senate were meeting in separate chambers of the Capitol to certify the vote count of the Electoral College of the 2020 Presidential Election, which had taken place on November 3, 2020. The joint session began at approximately 1:00 p.m. Vice President Michael R. Pence was present and presiding in the Senate chamber.

Shortly before the joint session was scheduled to begin, at approximately 12:47 p.m. on January 6, 2021, officers of the United States Capitol Police responded to the report of a possible explosive device in the vicinity of the National Republican Club, which is located at 300 First Street, Southeast, in Washington, D.C.

Shortly after the initial report of the possible explosive device in the vicinity of the National Republican Club, United States Capitol Police received a report of an additional possible explosive device at the Democratic National Committee Headquarters, which is located at 430 South Capitol Street, Southeast, in Washington, D.C. This location is approximately three blocks from the National Republican Club. The bomb squad of the United States Capitol Police responded to both locations to provide assistance in the investigation and to render the possible explosive devices safe.

Also as part of its response to the two reports of explosive devices, United States Capitol Police officers established a secure perimeter in an effort to protect the public and to facilitate the investigation of the possible explosive devices and any others in the vicinity. In connection with securing the area, canine units of the United States Capitol Police conducted investigative sweeps of the area. These investigative sweeps included canine sniffs and visual inspection of vehicles in the vicinity of the possible explosive device. While conducting these canine sweeps, two United States Capitol Police officers observed the handle of what appeared to be a firearm on the front right passenger seat of a red GMC Sierra 1500 pickup truck with Alabama license plate 52HJ703. A law enforcement database check of the vehicle registration revealed that the vehicle was registered to Lonnie L. Coffman with a home address in Falkville, Alabama.

After addressing the explosive devices found in the vicinity of the National Republican Club and the Democratic National Committee Headquarters, the Bomb Squad responded to the location of the Red GMC Sierra Pickup truck. One black handgun was recovered from the right front passenger seat of the vehicle. After locating the black handgun, officers proceeded to search the rest of the pickup truck, including the bed of the truck, which was secured under a fabric top. During the search of the cab of the truck, officers recovered, among other things, one M4 Carbine assault rifle along with rifle magazines loaded with ammunition.

In addition, officers recovered the following items in the bed of the pickup truck in close proximity to one another: (i) eleven mason jars containing an unknown liquid with a golf tee in the top of each jar, (ii) cloth rags, and (iii) lighters. Upon finding these materials, bomb technicians observed that the items appeared to be consistent with components for an explosive or incendiary

device known as a “Molotov Cocktail.” Based on this discovery, additional personnel were called to the scene, including the United States Capitol Police Hazardous Materials Team. A preliminary test by the United States Capitol Police Hazardous Material Team determined that the liquid in the mason jars was an igniting substance and that it had a spectrograph profile consistent with gasoline.

An explosive enforcement officer and a certified explosive specialist, both with the Bureau of Alcohol Tobacco Firearms and Explosives, were consulted and each stated that, based on their training and experience, the (i) eleven mason jars containing an unknown liquid with a golf tee in the top of each jar, (ii) cloth rags, and (iii) lighters found in close proximity to one another constitute a combination of parts either designed or intended for use in converting any device into a “destructive device,” as defined in 26 U.S.C. § 5845(f), and from which a “destructive device” may be readily assembled. Possession of the above-referenced components without registering any “destructive devices” with the National Firearms Registration and Transfer Record violates 26 U.S.C. § 5861(d).

At approximately 6:30 p.m., a blue sedan with a female driver and a male front passenger, approached law enforcement officers in the 400 block of First Street, Southeast. Officers made contact with the vehicle, and the male passenger stated that he was trying to get to his vehicle that was parked in the 300 block of First Street, Southeast, which is the location that the Red GMC Sierra 1500 pickup truck had been located and searched. When the officers asked the man to provide a description of the vehicle, the male passenger stated that it was a red pickup truck. The officers then asked what the male passenger’s name was, and he stated that his name was “Lonnie.” As noted herein, officers had previously determined that the red GMC Sierra 1500 pickup truck with Alabama license plate 52HJ703 was registered to Lonnie L. Coffman. The man asked officers whether they had located the bombs, which officers initially understood to be a reference to the components to the destructive devices located in COFFMAN’s truck, but later understood to be a reference to the secure perimeter that had been set up by law enforcement, which perimeter had kept COFFMAN from returning to his car earlier.

Based on the man’s statements and their understanding of the statements at the time, the officers asked the male passenger if he would step out of the vehicle so that they could assist him further with locating his vehicle. Upon exiting the vehicle, the officers asked the male passenger if he had any weapons on his person, and he responded that he had a gun in his right front pants pocket. The officers then detained the male passenger—later confirmed to be Lonnie L. COFFMAN—and officers conducted a search of the right pocket which revealed a handgun, later fully identified as a 9mm Smith & Wesson handgun with serial number LFN2577, and a set of GMC vehicle keys. After securing the 9mm Smith & Wesson, officers conducted a further search of COFFMAN and recovered a 22 caliber derringer style handgun from his front left pocket along with another set of GMC vehicle keys. Both sets of keys matched the vehicle and were capable of unlocking its door. Officers also recovered a wallet from COFFMAN’s person, which contained an Alabama driver’s license with the name Lonnie Leroy Coffman and the same address in Falkville, Alabama, that was returned from database check of the vehicle registration for the red GMC Sierra Pickup.

According to records checks of the National Firearms Registration and Transfer Record database using COFFMAN’s name and date of birth, neither the firearms recovered from

COFFMAN's person or his pickup truck, nor the destructive devices described above, are registered to him. In addition, COFFMAN has not registered any firearms in accordance with D.C. law.

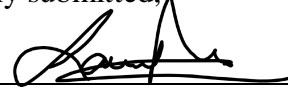
Thereafter, law enforcement asked COFFMAN a series of questions about possible explosive devices in an effort to further secure public safety. Among other things, law enforcement asked COFFMAN about the contents of the mason jars. COFFMAN stated that the mason jars contained "melted Styrofoam and gasoline." An explosive enforcement officer with the Bureau of Alcohol Tobacco Firearms and Explosives has advised that melted Styrofoam and gasoline are an explosive mixture that has the effect of napalm insofar as it causes the flammable liquid to better stick to objects that it hits upon detonation.

COFFMAN was later asked about his earlier statement to officers in which COFFMAN had asked officers if they had located bombs. COFFMAN denied that he was referring to any bombs that he had knowledge of, and he explained that he was simply referring to his understanding based on the perimeter that had been established, which had kept COFFMAN from returning to his pickup truck. At this point, the United States Capitol Police does not attribute the explosive devices at the National Republican Club and the Democratic National Committee Headquarters to COFFMAN.

Law enforcement reviewed video surveillance footage from the area where the vehicle was discovered. The video footage indicates that the vehicle was parked there at around 9:15 a.m., and that around five minutes later one and only one individual departed the vehicle from the driver's side door. The video footage reveals that the person who departed the vehicle was wearing a jacket with a patch consistent with clothing worn by COFFMAN when he was arrested.

Based upon the above information, there is probable cause to believe that Lonnie Leroy COFFMAN, on or about January 6, 2021 did possess destructive devices in violation of Section 5861(d) of Title 26 of the United States Code. In addition, there is probable cause to believe that Lonnie Leroy COFFMAN, on or about January 6, 2021 did carry a pistol without a license outside of a home or business in violation of D.C. Criminal Code 22-4504(a).

Respectfully submitted,



---

Lawrence Anyaso  
Special Agent  
United States Capitol Police

Subscribed and sworn before me by telephone pursuant to Fed. R. Crim. P. 4.1 on  
January 7, 2021:

---

HON. G. MICHAEL HARVEY  
UNITED STATES MAGISTRATE JUDGE



























































DOT CLASS C  
CONSUMER FIREWORKS  
1.4G UN0336

520910017614

MADE IN CHINA

**CAUTION FLAMMABLE**

USE ONLY UNDER CLOSE ADULT SUPERVISION.  
FOR OUTDOOR USE ONLY.  
DO NOT HOLD IN HAND. PLACE ON GROUND.  
LIGHT FUSE AND GET AWAY.

**CAMO SMOKE**

M100A



8

5 4 3 2 1 METRIC

8

7

B52602















