



U.S. Department of Justice

Matthew M. Graves  
United States Attorney

*District of Columbia*

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*Judiciary Center  
555 Fourth St., N.W.  
Washington, D.C. 20530*

November 9, 2021

VIA E-MAIL

Manuel Retureta, Esq.

Re: United States v. Lonnie Leroy Coffman  
Criminal Case Nos. 1:21-cr-00004 (CKK)

Dear Mr. Retureta:

This letter sets forth the full and complete addendum to the plea offer letters extended in these cases to your client, Lonnie Leroy Coffman.

**Forfeiture**

(a) The United States and your client hereby agree that the following items seized from his person and vehicle by law enforcement on or about January 6, 2021, and currently in the custody and/or control of the United States Capitol Police, were properly seized and were involved in or used in violations of United States and/or District of Columbia law by your client. Your client agrees that as a result of his conviction in this case, it would be illegal for him to possess the firearms and ammunition listed below:

- (1) 9mm Smith & Wesson handgun
- (2) .22 caliber North American Arms revolver
- (3) 9mm Hi-Point handgun
- (4) Windham Weaponry rifle
- (5) Hatfield Gun Company SAS shotgun
- (6) .22 caliber ammunition rounds
- (7) 9mm ammunition rounds
- (8) 5.56 x 45mm ammunition rounds
- (9) .223 caliber ammunition rounds
- (10) Shotgun shells
- (11) Assorted other ammunition rounds
- (12) Ammunition magazines
- (13) Ammunition pouches
- (14) 11 mason jars containing substances

Your client also agrees that 12 mason jars containing substances were properly seized from your client's residence in Alabama on January 26, 2021, and were involved in or used in violations of United States law by your client.

Your client agrees that these items identified in section (a) of this addendum are subject to seizure and forfeiture by the United States and that no defense exists to the seizure and forfeiture of this property by the United States. As such, your client hereby relinquishes all claim, title, and interest he has in the above-referenced property to the United States; the District of Columbia; and the State of Alabama; and agrees not to oppose any civil, administrative, or judicial forfeiture of the property. Your client agrees that he will not file a claim to this property and withdraws any claim for the property that he may have filed. Your client knowingly and voluntarily waives any right to timely notice provided for in 18 U.S.C. § 983. In the event that the law enforcement agency having custody of the property decides not to pursue forfeiture of the property, your client hereby consents to its destruction by, and or abandonment to, the law enforcement agencies. Your client certifies that he is the sole owner of the property listed above, and that no one else has an ownership interest in this property

(b) Your client agrees that as a result of his conviction in this case, it would be illegal for him to possess the firearms and ammunition listed below, and that these items were properly seized by law enforcement on or around January 26, 2021, at your client's residence in Alabama:

- (1) Rock River Arms rifle
- (2) Remington 7400 rifle
- (3) .308 ammunition rounds
- (4) 9mm ammunition rounds
- (5) Shotgun shells
- (6) .223 ammunition rounds
- (7) 30.06 ammunition rounds
- (8) Assorted other ammunition and gun powder

Your client certifies that he is the sole owner of the property listed in above, and that no one else has an ownership interest in this property. Your client consents to the disposition of these items through their provision to a third party under *Henderson v. United States*, 575 U.S. 622 (2015), whose name, address, and other information, has been provided to the Court, and who has promised not to allow your client to ever possess the items or exert any influence over their use. In the event that the anticipated provision to the third party is determined by the government or the Court to be inconsistent with the procedures outlined in *Henderson v. United States*, your client otherwise relinquishes all claim, title, and interest he has in the above-referenced property to the United States; the District of Columbia; and the State of Alabama; and agrees not to oppose any civil, administrative, or judicial forfeiture of the property. Your client agrees that he will not file a claim to this property and withdraws any claim for the property that he may have filed. Your client knowingly and voluntarily waives any right to timely notice provided for in 18 U.S.C. § 983. In the event that the law enforcement agency having custody of the property decides not to pursue forfeiture of the property, your client hereby consents to its destruction by, and or abandonment to, the law enforcement agencies.

(c) Your client agrees to waive all constitutional and statutory challenges in any manner (including, but not limited to, direct appeal) to any forfeiture carried out in accordance with this plea agreement on any grounds, including that the forfeiture constitutes an excessive fine or punishment.

If the foregoing terms and conditions are satisfactory, your client may so indicate by signing this Addendum, and returning both to me no later than November 12, 2021.

Sincerely yours,

Matthew M. Graves  
United States Attorney

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By: /MJF/ Michael Friedman / MJF  
Michael J. Friedman  
Assistant United States Attorney

DEFENDANT'S ACCEPTANCE

I have read every page of this Addendum and have discussed it with my attorney, Manuel Retureta, Esq. I fully understand this Addendum and agree to it without reservation. I do this voluntarily and of my own free will, intending to be legally bound. No threats have been made to me nor am I under the influence of anything that could impede my ability to understand this Addendum fully.

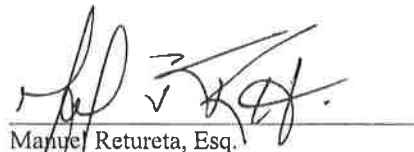
Date: 11-10-21

  
Lonnie Leroy Coffman  
Defendant

ATTORNEY'S ACKNOWLEDGMENT

I have read every page of this Addendum, reviewed this Addendum with my client, Lonnie Leroy Coffman, and fully discussed the provisions of this Addendum with my client. These pages accurately and completely set forth the entire Addendum.

Date: 11.10.21

  
Manuel Retureta, Esq.  
Attorney for Defendant

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

LONNIE LEROY COFFMAN,

Defendant.

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Case Nos.: 21-cr-00004 (CKK)  
21-cr-00614 (CKK)

DECLARATION OF STACEY LEE COFFMAN

I hereby declare that the following is true and correct under penalty of perjury:

1. My name is Stacey Lee Coffman. I was born on August 31, 1972, and I reside in the State of Alabama.
2. My father is Lonnie Leroy Coffman, the defendant charged in the United States District Court for the District of Columbia in Case Numbers 1:21-cr-00004 and 1:21-cr-00614.
3. I understand that now, and after his felony convictions in Case Numbers 1:21-cr-00004 and 1:21-cr-00614, Lonnie Leroy Coffman may not lawfully possess, control, or direct the use of any firearms or ammunition.
4. I understand that the following items were among those seized by law enforcement from the Alabama residence of Lonnie Leroy Coffman on January 26, 2021 (“the firearms and ammunition seized in Alabama”):
  - (1) Rock River Arms rifle
  - (2) Remington 7400 rifle
  - (3) .308 ammunition rounds
  - (4) 9mm ammunition rounds
  - (5) Shotgun shells
  - (6) .223 ammunition rounds
  - (7) 30.06 ammunition rounds
  - (8) Assorted other ammunition and gun powder

5. I understand that Lonnie Leroy Coffman has requested that the firearms and ammunition seized in Alabama be disposed of by law enforcement by providing them to me.
6. If the firearms and ammunition seized in Alabama are provided to me, I promise and will ensure that they are only used or transferred in a lawful manner. I promise and will ensure that Lonnie Leroy Coffman will not ever possess, control, or direct their use in any manner. I acknowledge that if I allow Lonnie Leroy Coffman to ever possess, control, or direct the use of the firearms and ammunition seized in Alabama, I may be responsible for aiding and abetting a violation of the law.
7. I am over the age of 21 and I am lawfully permitted to possess and own firearms and ammunition. With the exception of driving infractions, I have never been arrested or convicted of any crime as an adult.
8. I declare that the foregoing is true and correct to the best of my knowledge under penalty of perjury.

11-10-21  
Date

  
Stacey Lee Coffman

Witnessed by:

