

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- v. -

DAYVON CHESTNUT,
a/k/a "Dayvon Denaris Wynez
Chestnut,"
JOWAYNE TOMLISON,
SEAN KNOTT, and
ELIZABETH MCCASKILL,

Defendants.

- - - - - X

:
:
: **SUPERSEDING INDICTMENT**
:
: S1 18 Cr. 612 (WHP)

COUNT ONE

The Grand Jury charges:

1. From at least in or about 2016, up to and including in or about June 2018, in the Southern District of New York and elsewhere, DAYVON CHESTNUT; a/k/a "Dayvon Denaris Wynez Chestnut," JOWAYNE TOMLISON, SEAN KNOTT, and ELIZABETH MCCASKILL, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, a violation of Title 18, United States Code, Section 922(a)(1)(A).

2. It was a part and an object of the conspiracy that DAYVON CHESTNUT, a/k/a "Dayvon Denaris Wynez Chestnut," JOWAYNE TOMLISON, SEAN KNOTT, and ELIZABETH MCCASKILL, the defendants, and others known and unknown, not being licensed importers, manufacturers, or dealers, unlawfully and knowingly would and

did engage in the business of dealing in firearms, and in the course of such business did ship, transport, and receive firearms in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(a)(1)(A).

Overt Acts

3. In furtherance of the conspiracy and to effect its illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about March 30, 2018, SEAN KNOTT, the defendant, sent \$150 to DAYVON CHESTNUT, the defendant, via Western Union.

b. Beginning on or about April 7, 2018, and continuing on or about April 8, 2018, DAYVON CHESTNUT, a/k/a "Dayvon Denaris Wynez Chestnut," the defendant, traveled to the Southern District of New York from South Carolina.

c. On or about April 28, 2018, ELIZABETH MCCASKILL, the defendant, purchased approximately 3 firearms in Florence, South Carolina.

d. Beginning on or about April 28, 2018, and continuing on or about April 29, 2018, DAYVON CHESTNUT, a/k/a "Dayvon Denaris Wynez Chestnut," the defendant, traveled to the Southern District of New York from South Carolina.

e. On or about May 7, 2018, ELIZABETH MCCASKILL, the defendant, purchased approximately 2 firearms in Florence, South Carolina.

f. Beginning on or about May 8, 2018, and continuing on or about May 9, 2018, DAYVON CHESTNUT, a/k/a "Dayvon Denaris Wynez Chestnut," the defendant, traveled to the Southern District of New York from South Carolina.

g. On or about May 9, 2018, JOWAYNE TOMLISON, the defendant, traveled to the Southern District of New York from the Eastern District of New York.

h. Beginning on or about May 13, 2018, and continuing on or about May 14, 2018, DAYVON CHESTNUT, a/k/a "Dayvon Denaris Wynez Chestnut," the defendant, traveled to the Southern District of New York from South Carolina.

(Title 18, United States Code, Section 371.)

COUNT TWO

The Grand Jury further charges:

4. From at least in or about 2016, up to and including in or about June 2018, in the Southern District of New York and elsewhere, DAYVON CHESTNUT, a/k/a "Dayvon Denaris Wynez Chestnut," JOWAYNE TOMLISON, SEAN KNOTT, and ELIZABETH MCCASKILL, and others known and unknown, unlawfully and knowingly, not being licensed importers, manufacturers, or dealers, did engage in the business of dealing in firearms, and

in the course of such business did ship, transport, and receive firearms in interstate and foreign commerce, and aided and abetted the same, to wit, CHESTNUT, on multiple occasions, purchased firearms in South Carolina, and caused others, including MCCASKILL, to purchase firearms in South Carolina, which firearms were sold to other individuals, including JOWAYNE TOMLISON and SEAN KNOTT, for further resale, and transported in interstate commerce.

(Title 18, United States Code, Sections 922(a)(1)(A) and 2.)


FOREPERSON


GEOFFREY S. BERMAN *in*
United States Attorney

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MCCASKILL,

Defendants.

INDICTMENT

S1 18 Cr. 612 (WHP)

(Title 18, United States Code, Sections 371,
922(a)(1)(A), and 2.)

GEOFFREY S. BERMAN
United States Attorney.

A TRUE BILL

Foreperson.
