

THOMAS G. BRUTON UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA

v.

DONTAE HARPER (a/k/a "Tae Tae" and "Tae Savage"), TYRONE FOY (a/k/a "T-Roy"), TYJUAN TAPPLAR (a/k/a "TY"), ROBERT LEE THOMAS (a/k/a "Lil Rob"), DAVION HARRIS (a/k/a "Dinko"), and DEAVEAN MCCLURE (a/k/a "Dsco")

UNDER SEAL

Violations: Title 18, United States Code, Sections 1959(a)(1) and 1962(d)

1:25-cr-00794

Judge LaShonda A. Hunt Magistrate Judge Heather K. McShain RANDOM/Cat. 2

COUNT ONE

The SPECIAL APRIL 2025 GRAND JURY charges:

At times material to this Indictment:

1. Defendants DONTAE HARPER (also known as "Tae Tae" and "Tae Savage"), TYRONE FOY (also known as "T-Roy"), TYJUAN TAPPLAR (also known as "TY"), ROBERT LEE THOMAS (also known as "Lil Rob"), DAVION HARRIS (also known as "Dinko"), and DEAVEAN MCCLURE (also known as "Dsco"), together with Diontae Harper (also known as "Chubbs"), Amonti McClure (also known as "Monti" or "Lil Monti Bucks"), Keshawn Wordlow (also known as "Flup"), Coconspirator 3, Coconspirator 9, and others known and unknown to the Grand Jury, were leaders, members, and associates of the Faceworld street gang, a criminal organization whose leaders, members, and associates engaged in acts of violence, including, but not limited to, acts involving murder, assault, robbery, and vehicular hijacking, as well

as drug trafficking. The Faceworld street gang operated on the South Side of Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere.

- 2. The Faceworld street gang, including its leaders, members, and associates, constituted an enterprise as defined in Title 18, United States Code, Sections 1961(4) and 1959(b)(2), that is, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce ("the Faceworld Enterprise" or "the Enterprise").
- 3. The Faceworld Enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.
- 4. Defendants DONTAE HARPER, TYRONE FOY, TYJUAN TAPPLAR, ROBERT LEE THOMAS, DAVION HARRIS, and DEAVEAN MCCLURE, together with Diontae Harper, Amonti McClure, Keshawn Wordlow, Coconspirator 3, Coconspirator 9, and others known and unknown, were leaders, members, and associates of the Faceworld Enterprise.
- 5. The Faceworld Enterprise engaged in longstanding and violent feuds with several rival street gangs, including "Wuga World" and "900," among others. Over the course of these conflicts, Faceworld Enterprise members and associates committed acts of violence against their rivals inside rival territory and in areas where rivals were believed to be located.

PURPOSES OF THE ENTERPRISE

- 6. The purposes of the Faceworld Enterprise included, but were not limited to, the following:
- a. Preserving and protecting the power, territory, operations, and proceeds of the Enterprise through acts of violence, including, but not limited to, murder and assault, and threats of violence;
- b. Enriching leaders, members, and associates of the Enterprise through, among other things, robberies and the illegal trafficking of controlled substances;
- c. Promoting and enhancing the Enterprise and its leaders', members', and associates' criminal activities and violent reputation, including by publicly claiming responsibility for acts of violence committed by the Enterprise and taunting rival gang members;
- c. Keeping victims, rival gang members, and witnesses in fear of the Enterprise and its leaders, members, and associates through acts and threats of violence;
- d. Increasing the status of the Enterprise through the use of social media platforms and producing and marketing songs, music recordings, and music videos; and
- e. Taking steps designed to prevent law enforcement's detection of the Enterprise's criminal activities.

MEANS AND METHODS OF THE ENTERPRISE

- 7. The means and methods by which the defendants and other leaders, members, and associates of the Faceworld Enterprise conducted and participated in the conduct of the affairs of the Enterprise included, but were not limited to, the following:
- a. Members of the Faceworld Enterprise employed and used gang-related terminology, symbols, and gestures to identify themselves to each other and to others, including writing and saying "079," the numbers associated with 79th Street in Faceworld Enterprise territory, using hand signs disrespecting their rivals, and saying slogans like "onju," "onjuju," "on Jujuan," "on Mike," and "on Face," references to deceased Faceworld Enterprise members;
- b. To perpetuate the Faceworld Enterprise and to maintain, protect, and extend its power, leaders, members, and associates of the Faceworld Enterprise committed illegal acts, including, but not limited to, multiple acts involving murder, attempted murder, assault, and other acts of violence, against individuals who were perceived to pose a threat to the Faceworld Enterprise or jeopardize its operations, including rival gang members;
- c. To perpetuate the Faceworld Enterprise and to maintain and extend its power, leaders, members, and associates of the Faceworld Enterprise hijacked and stole cars, which they used to drive through neighborhoods of rival gang members and shoot at rival gang members;

- d. Members of the Faceworld Enterprise and their associates shared in the proceeds of the Enterprise's illegal activities, including, but not limited to, robberies (including vehicular hijackings) and the illegal trafficking of controlled substances;
- e. Members of the Faceworld Enterprise and their associates used multiple cellular telephones and Facebook and other social media and messaging services to communicate with one another concerning and during the commission of the Enterprise's illegal activities;
- f. Leaders, members, and associates of the Faceworld Enterprise promoted the Enterprise on social media sites, including Facebook and Instagram. For example, Faceworld Enterprise leaders, members, and associates distributed messages, photographs, and videos on social media sites in which they, among other things, proclaimed their membership in, or association with, the Enterprise and boasted about illegal activities, including multiple acts involving murder;
- g. Leaders, members, and associates of the Faceworld Enterprise obtained, used, carried, possessed, brandished, and discharged firearms in connection with the Enterprise's illegal activities, including, but not limited to, acts involving murder and robbery (including vehicular hijacking);
- h. Members of the Faceworld Enterprise and their associates managed the procurement, transfer, use, maintenance, concealment, and disposal of firearms and dangerous weapons within the Enterprise to protect their territory,

personnel, and operations, and to deter, eliminate, and retaliate against rival criminal organizations and persons;

- i. Members of the Faceworld Enterprise and their associates conspired to possess and distribute, distributed, and possessed with intent to distribute quantities of controlled substances such as marijuana, cocaine, and heroin in the conduct of the affairs of the Enterprise in or around Chicago, Illinois, Iowa, and elsewhere;
- j. Members of the Faceworld Enterprise and their associates transported controlled substances from Chicago, Illinois, to Iowa, and sold controlled substances in Chicago, Illinois, and Iowa to earn money for themselves and for other leaders, members, and associates of the Faceworld Enterprise; and
- k. Members of the Faceworld Enterprise and their associates concealed, hid, and misrepresented, and caused to be concealed, hidden and misrepresented, the purposes of the acts done in furtherance of the enterprise, and used coded language, and other techniques and means to avoid detection and apprehension by law enforcement.

RACKETEERING CONSPIRACY

8. Beginning no later than in or around 2019 and continuing through at least in or around March 2025, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

defendants herein, as well as Diontae Harper (also known as "Chubbs"), Amonti McClure (also known as "Monti" or "Lil Monti Bucks"), Keshawn Wordlow (also known as "Flup"), Coconspirator 3, Coconspirator 9, and others known and unknown to the Grand Jury, each being a person employed by and associated with the Faceworld Enterprise, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, knowingly conspired to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the Faceworld Enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and (5), which pattern of racketeering consisted of:

a. multiple acts involving murder, chargeable under Chapter 720, Illinois Compiled Statutes, Sections 5/5-1, 5/5-2, 5/8-1(b), 5/8-2, 5/8-4, and 5/9-1;

- b. multiple acts involving robbery, chargeable under Chapter 720, Illinois Compiled Statutes, Sections 5/5-1, 5/5-2, 5/8-1(a), 5/8-2, 5/8-4, 5/18-1, 5/18-2, and 5/18-3; and
- c. multiple offenses involving trafficking in controlled substances, in violation of Title 21, United States Code, Sections 841 and 846.
- 9. It was further part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

Overt Acts

- 10. In furtherance of the racketeering conspiracy, and to affect the object thereof, the defendants and others known and unknown to the Grand Jury, committed and caused to be committed the following acts, among others, in the Northern District of Illinois and elsewhere:
- a. On or about March 15, 2019, defendant DONTAE HARPER shot and killed Antwon Fields (also known as "Mister"). Coconspirator 3 (who is deceased) drove HARPER during the shooting.
- b. On or about April 1, 2019, defendant TYJUAN TAPPLAR shot and killed Brittani Rice and Senobia Brantley and shot at Victim 1, wounding him.
- c. On or about June 17, 2019, defendant ROBERT LEE THOMAS shot at Victim 2 and other passengers on a Chicago Transit Authority bus, wounding Victim 2 and others. Defendant TYJUAN TAPPLAR was with THOMAS at the time of the shooting.

- d. On or about June 29, 2019, defendant TYRONE FOY, defendant TYJUAN TAPPLAR, defendant ROBERT LEE THOMAS, Keshawn Wordlow, and David Glee robbed and assaulted Victim 3 and Victim 4 at gunpoint and sexually assaulted Victim 4.
- e. On or about July 26, 2019, defendant TYRONE FOY drove Keshawn Wordlow and Coconspirator 3, when Wordlow and Coconspirator 3 shot and killed Chantell Grant and Andrea Stoudemire and shot Donald Weathersby and Victim 5, wounding them. At the time of this shooting, FOY, Wordlow, and Coconspirator 3 were driving through Wuga World territory when they saw individuals who they believed to be rival gang members and together decided to shoot them.
- f. On or about August 3, 2019, defendant TYJUAN TAPPLAR drove Keshawn Wordlow, defendant TYRONE FOY, and Coconspirator 3, when FOY and Coconspirator 3 shot and killed Calvin Seay (also known as "D-Rose"). At the time of this murder, TAPPLAR, FOY, Wordlow, and Coconspirator 3 were driving in Wuga World territory, when they saw Calvin Seay and his brother, who they believed to be rival gang members, and together decided to shoot at Seay in retaliation for a shooting that had happened in Faceworld Enterprise territory the night before.
- g. On or about August 4, 2019, defendant TYJUAN TAPPLAR drove defendant TYRONE FOY, Amonti McClure, and Coconspirator 3, when FOY and McClure shot and killed Cornelius Jordan and shot at Victim 6, wounding her. At the time of this shooting, TAPPLAR, FOY, McClure, and Coconspirator 3 were driving in

Wuga World territory with the intent to shoot up a memorial taking place for Calvin Seay, who was murdered the night before. While doing so, they saw Jordan, who they believed to be affiliated with Wuga World. Wordlow gave FOY the firearm used to shoot Jordan.

- h. On or about August 11, 2019, Faceworld Enterprise leaders, members, and associates shot at Donald Weathersby, wounding him.
- On or about May 13, 2020, Amonti McClure drove defendant ROBERT LEE THOMAS, Diontae Harper, and Keshawn Wordlow, when Diontae Harper and Wordlow shot and killed Paul Harris. At the time of this shooting, Coconspirator 3 drove another car in which defendant DEAVEAN MCCLURE was a passenger. Prior to the shooting, the men in both cars were searching for Paul Harris to shoot him and were communicating by telephone between the two cars in an effort to identify Paul Harris's location. After the men spotted Paul Harris at a gas station, the men in both cars decided that Coconspirator 3 and Amonti McClure would drive to a nearby side street in order to avoid law enforcement detection. After Coconspirator 3 and Amonti McClure drove to the side street, Diontae Harper and Keshawn Wordlow exited Amonti McClure's car, returned to the gas station parking lot, and shot Paul Harris multiple times. Defendant DONTAE HARPER supplied one of the firearms used in the shooting earlier that day and helped to plan the shooting by calling individuals in the two cars to provide information about Paul Harris's location.

- j. On or about July 14, 2020, Keshawn Wordlow, Coconspirator 3, and Coconspirator 9 shot and killed Donald Weathersby, who the men believed to be a member of Wuga World. This shooting was in retaliation for the death of a Faceworld Enterprise member.
- k. On or about July 21, 2020, Coconspirator 9 drove defendant DONTAE HARPER, Keshawn Wordlow, and Coconspirator 3, when DONTAE HARPER and Coconspirator 3 shot at multiple funeralgoers at Donald Weathersby's funeral, many of whom were wounded. Coconspirator 3 planned this shooting as retaliation for the death of a Faceworld Enterprise member, and all of the men in the car together planned to shoot up the funeral.
- l. On or about August 27, 2020, defendant ROBERT LEE THOMAS and Keshawn Wordlow, who were being driven by Coconspirator 3, shot at Victim 7, wounding him.
- m. On or about October 14, 2020, defendant DAVION HARRIS drove Keshawn Wordlow and Coconspirator 9, when Wordlow and Coconspirator 9 shot and killed Osama Ibrahim (also known as "Samo"). At the time of this shooting, defendant DEAVEAN MCCLURE drove a separate car and acted as a look-out for the shooting. Coconspirator 3 helped to plan the shooting and provided information to the men in both cars about where to find Osama Ibrahim, who Conspirator 3 wanted to murder because he believed Ibrahim was a member of the rival gang 900 and that Ibrahim had publicized information about Faceworld Enterprise members' addresses.

- n. On or about February 26, 2021, Coconspirator 3 drove defendant DONTAE HARPER, defendant ROBERT LEE THOMAS, and Keshawn Wordlow, when HARPER, THOMAS, and Wordlow shot and killed Dantrell Johnson (also known as "Blaze") and shot at Victim 8, wounding him. At the time of the shooting, the men were driving in Wuga World territory when they recognized Dantrell Johnson's car, which they believed to be a Wuga World car, and together decided to shoot Dantrell Johnson.
- o. On or about April 8, 2021, Coconspirator 3 drove defendant DONTAE HARPER, when HARPER shot and killed Darrell Robertson (also known as "Beans"). At the time of the shooting, defendant DAVION HARRIS was driving a separate car nearby. Coconspirator 3 and HARRIS both saw Darrell Robertson, who they believed to be a rival gang member, and followed Robertson's car onto Interstate 57 in Chicago, where HARPER shot Robertson.
- p. On or about April 10, 2021, defendant DAVION HARRIS and Keshawn Wordlow approached the owner of a gray Kia at a gas station in Riverdale, Illinois. Wordlow pointed a gun at the car owner and demanded he give them the car keys. Wordlow then drove away in the gray Kia.
- q. On or about April 11, 2021, defendant DAVION HARRIS and Keshawn Wordlow shot and killed Harold Green. At the time of the shooting, Wordlow was driving HARRIS and defendant ROBERT LEE THOMAS in the Kia they had stolen on April 10, 2021. Wordlow was driving in a gas station parking lot in Chicago when THOMAS saw Harold Green walking in the parking lot. THOMAS

told HARRIS and Wordlow that he wanted Harold Green dead because THOMAS recognized Green as the man who had shot THOMAS months prior after THOMAS attempted to rob Green at gunpoint. Wordlow then drove next to Green, and Wordlow and HARRIS rolled down their windows and both shot Green from the car.

- r. In or around 2020 and 2021, Faceworld Enterprise members trafficked narcotics, including cocaine and marijuana.
- s. In or around May 2020, Keshawn Wordlow traveled from Chicago to Iowa with Diontae Harper for the purpose of selling cocaine to customers in Iowa and shared the proceeds with Diontae Harper.
- t. On or about March 3, 2024, defendant TYJUAN TAPPLAR rapped on a recorded phone call about "thugging in them trenches" and referenced Coconspirator 3, and further stated "they know we gonna shoot when we pop out."
- u. On or about March 4, 2024, defendants TYJUAN TAPPLAR and DONTAE HARPER discussed law enforcement's investigation and individuals who were providing information to law enforcement during a recorded phone call.
- v. On or about March 4, 2024, during a recorded phone call, defendant TYJUAN TAPPLAR, defendant DONTAE HARPER, and Diontae Harper discussed law enforcement's investigation and individuals who were providing information to law enforcement.
- w. On or about January 2, 2025, during a recorded phone call, defendant TYRONE FOY, Diontae Harper, and another individual discussed individuals who had provided information to law enforcement, who Diontae Harper

described as "rats." FOY stated, "you think they can recant on everything they said and and shit would just go away." Diontae Harper also stated, "once I put that Faceworld shit behind my name I ain't I'm I'm I I never turn puss." FOY responded, "On Jujuan."

x. On or about August 8, 2025, defendant DEAVEAN MCCLURE commented on social media, "If yo plea deal have u agreeing to anything incriminating u a rat."

SPECIAL SENTENCING FACTORS AS TO COUNT ONE

As part of their agreement to conduct and participate in the conduct of the affairs of the Faceworld Enterprise through a pattern of racketeering activity, the following defendants committed the following acts:

- 1. On or about March 15, 2019, within the Northern District of Illinois, the defendant DONTAE HARPER killed Antwon Fields (also known as "Mister") without lawful justification, and in performing acts which caused the death of Antwon Fields: (a) intended to kill and do great bodily harm to Antwon Fields and knew that such acts would cause the death of Antwon Fields or another; and (b) knew that such acts created a strong probability of death and great bodily harm to Antwon Fields or another; in violation of Chapter 720, Illinois Compiled Statutes, Section 5/9-1(a)(1) and (a)(2), 5/5-1, and 5/5-2.
- a. DONTAE HARPER was over 18 years of age at the time of the commission of the murder of Antwon Fields, pursuant to Chapter 730, Illinois

Compiled Statutes, Section 5/5-8-1(a)(1)(c) (version in force from Aug. 25, 2017 to May 31, 2019);

- b. DONTAE HARPER murdered more than one victim, in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(c)(ii) (version in force from Aug. 25, 2017 to May 31, 2019);
- c. DONTAE HARPER personally discharged a firearm that proximately caused great bodily harm and death to another person, in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(d)(iii) (version in force from Aug. 25, 2017 to May 31, 2019); and
- d. DONTAE HARPER intentionally discharged a firearm from a motor vehicle and the victim was not present within the motor vehicle, in violation of Chapter 720, Illinois Compiled Statutes, Section 5/9-1(b)(15) (version in force from Aug. 14, 2018 to Dec. 31, 2019) and Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(b) (version in force from Aug. 25, 2017 to May 31, 2019).
- 2. On or about August 3, 2019, within the Northern District of Illinois, defendants TYRONE FOY and TYJUAN TAPPLAR killed Calvin Seay (also known as "D-Rose") without lawful justification, and in performing acts which caused the death of Calvin Seay: (a) intended to kill and do great bodily harm to Calvin Seay and knew that such acts would cause the death of Calvin Seay or another; and (b) knew that such acts created a strong probability of death and great bodily harm to Calvin Seay or another; in violation of Chapter 720, Illinois Compiled Statutes, Section 5/9-1(a)(1) and (a)(2), 5/5-1, and 5/5-2.

- a. TYRONE FOY and TYJUAN TAPPLAR were over 18 years of age at the time of the commission of the murder of Calvin Seay, pursuant to Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(c) (version in force from June 1, 2019 to Dec. 31, 2019);
- b. TYRONE FOY and TYJUAN TAPPLAR each murdered more than one victim, in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(c)(ii) (version in force from June 1, 2019 to Dec. 31, 2019); and
- c. TYRONE FOY personally discharged a firearm that proximately caused great bodily harm and death to another person, in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(d)(iii) (version in force from June 1, 2019 to Dec. 31, 2019).
- 3. On or about August 4, 2019, within the Northern District of Illinois, defendants TYRONE FOY and TYJUAN TAPPLAR killed Cornelius Jordan (also known as "CJ") without lawful justification, and in performing acts which caused the death of Cornelius Jordan: (a) intended to kill and do great bodily harm to Cornelius Jordan and knew that such acts would cause the death of Cornelius Jordan or another; and (b) knew that such acts created a strong probability of death and great bodily harm to Cornelius Jordan or another; in violation of Chapter 720, Illinois Compiled Statutes, Section 5/9-1(a)(1) and (a)(2), 5/5-1, and 5/5-2.
- a. TYRONE FOY and TYJUAN TAPPLAR were each over 18 years of age at the time of the commission of the murder of Cornelius Jordan, pursuant to

Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(c) (version in force from June 1, 2019 to Dec. 31, 2019);

- b. TYRONE FOY and TYJUAN TAPPLAR each murdered more than one victim, in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(c)(ii) (version in force from June 1, 2019 to Dec. 31, 2019).
- c. TYRONE FOY personally discharged a firearm that proximately caused great bodily harm and death to another person, in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(d)(iii) (version in force from June 1, 2019 to Dec. 31, 2019); and
- d. TYRONE FOY intentionally discharged a firearm from a motor vehicle and the victim was not present within the motor vehicle, in violation of in violation of Chapter 720, Illinois Compiled Statutes, Section 5/9-1(b)(15) (version in force from Aug. 14, 2018 to Dec. 31, 2019) and Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(b) (version in force from June 1, 2019 to Dec. 31, 2019).
- 4. On or about October 14, 2020, within the Northern District of Illinois, defendants DAVION HARRIS and DEAVEAN MCCLURE killed Osama Ibrahim (also known as "Samo") without lawful justification, and in performing acts which caused the death of Osama Ibrahim: (a) intended to kill and do great bodily harm to Osama Ibrahim or another, and knew that such acts would cause the death of Osama Ibrahim or another; and (b) knew that such acts created a strong probability of death and great bodily harm to Osama Ibrahim or another; in violation of Chapter 720, Illinois Compiled Statutes, Section 5/9-1(a)(1) and (a)(2), 5/5-1, and 5/5-2.

- a. DAVION HARRIS and DEAVEAN MCCLURE were each over 18 years of age at the time of the commission of the murder of Osama Ibrahim, pursuant to Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(c) (version in force from Jan. 1, 2020 to June 30, 2021);
- b. DAVION HARRIS and DEAVEAN MCCLURE each murdered more than one victim, in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(c)(ii) (version in force from Jan. 1, 2020 to June 30, 2021); and
- c. The murder was committed in a cold, calculated and premeditated manner pursuant to a preconceived plan, scheme, and design to take a human life by unlawful means, and the conduct of the named defendant created a reasonable expectation that the death of a human being would result therefrom, in violation of Chapter 720, Illinois Compiled Statutes, Section 5/9-1(b)(11) (version in force from Jan. 1, 2020 to June 30, 2021), and Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(b) (version in force from Jan. 1, 2020 to June 30, 2021).
- 5. On or about April 11, 2021, within the Northern District of Illinois, defendants DAVION HARRIS and ROBERT LEE THOMAS killed Harold Green without lawful justification, and in performing acts which caused the death of Harold Green: (a) intended to kill and do great bodily harm to Harold Green or another and knew that such acts would cause the death of Harold Green or another; and (b) knew that such acts created a strong probability of death and great bodily harm to Harold Green or another; in violation of Chapter 720, Illinois Compiled Statutes, Section 5/9-1(a)(1) and (a)(2), 5/5-1, and 5/5-2.

- a. DAVION HARRIS and ROBERT LEE THOMAS were each over 18 years of age at the time of the commission of the murder of Harold Green, pursuant to Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(c) (version in force from Jan. 1, 2020 to June 30, 2021);
- b. DAVION HARRIS murdered more than one victim, in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(c)(ii) (version in force from Jan. 1, 2020 to June 30, 2021);
- c. DAVION HARRIS personally discharged a firearm that proximately caused great bodily harm and death to another person, in violation of Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(d)(iii) (version in force from Jan. 1, 2020 to June 30, 2021); and
- d. DAVION HARRIS intentionally discharged a firearm from a motor vehicle and the victim was not present within the motor vehicle, in violation of Chapter 720, Illinois Compiled Statutes, Section 5/9-1(b)(15) (version in force from Jan. 1, 2020 to June 30, 2021) and Chapter 730, Illinois Compiled Statutes, Section 5/5-8-1(a)(1)(b) (version in force from Jan. 1, 2020 to June 30, 2021);

All in violation of Title 18, United States Code, Section 1962(d).

COUNT TWO

The SPECIAL APRIL 2025 GRAND JURY further charges:

At times material to this Indictment:

- 1. Paragraphs 1 through 7 of Count One of this Indictment are realleged and incorporated here.
- 2. The Faceworld Enterprise, through its leaders, members, and associates, engaged in racketeering activity, as defined in Title 18 United States, Section 1959(b)(1) and 1961(1), that is, multiple acts involving murder, chargeable under Chapter 720, Illinois Compiled Statutes, Sections 5/5-1, 5/5-2, 5/8-1(b), 5/8-2, 5/8-4, and 5/9-1.
- 3. On or about March 15, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

DONTAE HARPER (also known as "Tae Tae" and "Tae Savage"), defendant herein, together with Coconspirator 3, and others known and unknown to the Grand Jury, for the purpose of maintaining and increasing position in the Faceworld Enterprise, an enterprise engaged in racketeering activity, did knowingly and intentionally murder Antwon Fields (also known as "Lil Mister"), in violation of the laws of the State of Illinois, specifically, Chapter 720, Illinois Compiled Statutes, Sections 5/9-1(a), 5/5-1, and 5/5-2.

SPECIAL SENTENCING FACTORS AS TO COUNT TWO

1. Defendant DONTAE HARPER:

- a. Was eighteen years of age or older at the time of the offense (Title 18, United States Code, Section 3591(a)(2));
- b. Intentionally killed the victim, Antwon Fields (also known as "Lil Mister") (Title 18, United States Code, Section 3591(a)(2)(A));
- c. Intentionally inflicted serious bodily injury that resulted in the death of the victim, Antwon Fields (Title 18, United States Code, Section 3591(a)(2)(B));
- d. Intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));
- e. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));
- f. In the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense (Title 18, United States Code, Section 3592(c)(5)); and

g. Committed the offense after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9)).

In violation of Title 18, United States Code, Section 1959(a)(1) and 2.

COUNT THREE

The SPECIAL APRIL 2025 GRAND JURY further charges:

At times material to this Indictment:

- 1. Paragraphs 1 through 7 of Count One of this Indictment are realleged and incorporated here.
- 2. The Faceworld Enterprise, through its leaders, members, and associates, engaged in racketeering activity, as defined in Title 18 United States, Section 1959(b)(1) and 1961(1), that is, multiple acts involving murder, chargeable under Chapter 720, Illinois Compiled Statutes, Sections 5/5-1, 5/5-2, 5/8-1(b), 5/8-2, 5/8-4, and 5/9-1.
- 3. On or about August 4, 2019, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TYRONE FOY (also known as "T-Roy") and TYJUAN TAPPLAR (also known as "TY"),

defendants herein, together with Amonti McClure (also known as "lil Monti"), Keshawn Wordlow (also known as "Flup"), and others known and unknown to the Grand Jury, for the purpose of maintaining and increasing position in the Faceworld Enterprise, an enterprise engaged in racketeering activity, did intentionally and knowingly murder Cornelius Jordan, in violation of the laws of the State of Illinois, specifically, Chapter 720, Illinois Compiled Statutes, Sections 5/9-1(a), 5/5-1, and 5/5-2.

SPECIAL SENTENCING FACTORS AS TO COUNT THREE AS TO TYRONE FOY ONLY

1. Defendant TYRONE FOY:

- a. Was eighteen years of age or older at the time of the offense (Title 18, United States Code, Section 3591(a)(2));
- b. Intentionally killed the victim, Cornelius Jordan (also known as "CJ") (Title 18, United States Code, Section 3591(a)(2)(A));
- c. Intentionally inflicted serious bodily injury that resulted in the death of the victim, Cornelius Jordan (Title 18, United States Code, Section 3591(a)(2)(B));
- d. Intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));
- e. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));
- f. In the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense (Title 18, United States Code, Section 3592(c)(5)); and

g. Committed the offense after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9)).

SPECIAL SENTENCING FACTORS AS TO COUNT THREE AS TO TYJUAN TAPPLAR ONLY

1. Defendant TYJUAN TAPPLAR:

- a. Was eighteen years of age or older at the time of the offense (Title 18, United States Code, Section 3591(a)(2));
- b. Intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(C));
- c. Intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim died as a direct result of the act (Title 18, United States Code, Section 3591(a)(2)(D));
- d. In the commission of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense (Title 18, United States Code, Section 3592(c)(5)); and

e. Committed the offense after substantial planning and premeditation to cause the death of a person (Title 18, United States Code, Section 3592(c)(9)).

In violation of Title 18, United States Code, Section 1959(a)(1) and 2.

| In violation of Title 18, United States Code, Section 1959(a)(1) and 2. | |
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| | A TRUE BILL: |
| | FOREPERSON |
| UNITED STATES ATTORNEY | |