

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	No.
)	
TRAVIS THOMAS, also known as)	Violations: Title 18, United States,
“Travis Thompson,”)	Code, Sections 1591(a), (b)(1),
“Dontaveous Harper,” and)	2421(a), and 2422(a)
“Dontavious Harper”)	

COUNT ONE

The MAY 2018 GRAND JURY charges:

From in or around December 2017 to on or about April 15, 2018, in the Northern District of Illinois, Western Division, and elsewhere,

TRAVIS THOMAS, also known as
“Travis Thompson,” “Dontaveous Harper,” and “Dontavious Harper”

defendant herein, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person, namely, Jane Doe 1, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, and maintaining by any means Jane Doe 1, knowing and in reckless disregard that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Jane Doe 1 to engage in a commercial sex act;

In violation of title 18, United States Code, Sections 1591(a) and (b)(1).

COUNT TWO

The MAY 2018 GRAND JURY further charges:

On or about February 5, 2018, in the Northern District of Illinois, Western Division, and elsewhere,

TRAVIS THOMAS, also known as
“Travis Thompson,” “Dontaveous Harper,” and “Dontavious Harper”

defendant herein, knowingly transported Jane Doe 1 in interstate commerce from the state of Illinois to the state of Wisconsin, with the intent that Jane Doe 1 engage in prostitution;

In violation of Title 18, United States Code, Section 2421(a).

COUNT THREE

The MAY 2018 GRAND JURY further charges:

On or about February 17, 2018, within the Northern District of Illinois, Western Division and elsewhere,

TRAVIS THOMAS, also known as
“Travis Thompson,” “Dontaveous Harper,” and “Dontavious Harper”

defendant herein, knowingly transported Jane Doe 1 in interstate commerce from the state of Illinois to the state of Texas, with the intent that Jane Doe 1 engage in prostitution;

In violation of Title 18, United States Code, Section 2421(a).

COUNT FOUR

The MAY 2018 GRAND JURY further charges:

On or about February 5, 2018, in the Northern District of Illinois, Western Division and elsewhere,

TRAVIS THOMAS, also known as
“Travis Thompson,” “Dontaveous Harper,” and “Dontavious Harper”

defendant herein, knowingly persuaded, induced, enticed, and coerced Jane Doe 1 to travel in interstate commerce from the state of Illinois to the state of Wisconsin, with the intent that Jane Doe 1 engage in prostitution;

In violation of Title 18, United States Code, Section 2422(a).

COUNT FIVE

The MAY 2018 GRAND JURY further charges:

On or about February 17, 2018, in the Northern District of Illinois, Western Division and elsewhere,

TRAVIS THOMAS, also known as
“Travis Thompson,” “Dontaveous Harper,” and “Dontavious Harper”

defendant herein, knowingly persuaded, induced, enticed, or coerced Jane Doe 1 to travel in interstate commerce from the state of Illinois to the state of Texas, with the intent that Jane Doe 1 engage in prostitution;

In violation of Title 18, United States Code, Section 2422(a).

FORFEITURE ALLEGATION

The MAY 2018 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1591(a) as set forth in this Indictment, defendant TRAVIS THOMAS, also known as “Travis Thompson,” “Dontaveous Harper,” and “Dontavious Harper,” shall forfeit to the United States of America any property which constitutes and is derived from proceeds obtained, directly or indirectly, as a result of the offense; and any property used or intended to be used to commit or facilitate the commission of the offense, as provided by Title 18, United States Code, Section 1594(d)(1) & (2).

2. Upon conviction of an offense in violation of Title 18, United States Code, Sections 2421 or 2422 as set forth in this Indictment, defendant TRAVIS THOMAS, also known as “Travis Thompson,” “Dontaveous Harper,” and “Dontavious Harper,” shall forfeit to the United States of America (1) any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offense; and (2) any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense, as provided by Title 18, United States Code Section 2428.

3. If any of the property described above, as a result of any act or omission of the defendant cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty; the United States shall be entitled to forfeiture of substitute property, as provided by Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY