

FILED

DEC 10 2024

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

Heidi D. Campbell, Clerk
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Plaintiff,

v.

TRAVIS FORD,

Defendant.

Case No. **24 CR - 387 JDR**

INFORMATION

**[18 U.S.C. § 371 – Conspiracy to
Commit Wire Fraud;
Forfeiture Allegation: 18 U.S.C.
§ 981(a)(1)(C) and 28 U.S.C.
§ 2461(c) – Fraud Forfeiture]**

THE UNITED STATES OF AMERICA CHARGES:

INTRODUCTION

At all times relevant to this Information:

1. Defendant **TRAVIS FORD** was a resident in the Northern District of Oklahoma.
2. **TRAVIS FORD** was a co-founder, Chief Executive Officer (“CEO”), and head trader for Wolf Capital Crypto Trading LLC (“Wolf Capital”).
3. Wolf Capital was a purported cryptocurrency investment firm utilizing “decentralized finance” to raise funds from investors. Wolf Capital launched in or around January 2023 and continued operating until at least in or around August 2023. Wolf Capital promised investors returns of between 1–2% per day, amounting to approximately 547% per year.
4. As the co-founder, CEO, and head trader for Wolf Capital, **TRAVIS FORD** publicly held himself out as a sophisticated trader able to deliver the high

returns promised by Wolf Capital, which he also publicly stood behind.

5. **TRAVIS FORD** and his co-conspirators agreed to engage in a scheme to defraud investors in Wolf Capital to the financial benefit of **TRAVIS FORD** and his co-conspirators and to the financial detriment of Wolf Capital investors.

COUNT ONE

Conspiracy to Commit Wire Fraud (18 U.S.C. § 371)

6. Paragraphs 1 through 5 of this Information are realleged and incorporated by reference as though fully set forth herein.

7. From at least in or around January 2023 through at least in or around August 2023, in the Northern District of Oklahoma, and elsewhere, the defendant,

TRAVIS FORD,

did knowingly and willfully, that is, with the intent to further the object of the conspiracy, combine, conspire, confederate, and agree with CC-1, and others known and unknown to the United States, to commit an offense against the United States, that is, a violation of Title 18, United States Code, Section 1343, by devising or intending to devise a scheme and artifice to defraud Wolf Capital investors and to obtain money and property from them by means of one or more materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, to transmit and case to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures and sounds.

Purpose of the Conspiracy

8. It was the purpose of the conspiracy for **TRAVIS FORD** and his co-conspirators to fraudulently induce and retain investments in Wolf Capital in order to unlawfully enrich themselves at the expense of Wolf Capital investors.

Manner and Means of the Conspiracy

The manner and means by which **TRAVIS FORD** and his co-conspirators sought to accomplish the purpose and objects of the conspiracy included, among others, the following:

9. **TRAVIS FORD** and his co-conspirators used the Wolf Capital website, and social media including the Wolf Capital Discord server and Wolf Capital Telegram server, to fraudulently induce investors to send funds to Wolf Capital through materially false and fraudulent pretenses, representations, and promises.

10. For example, despite telling investors that Wolf Capital would return approximately 1–2% per day, **TRAVIS FORD** knew that Wolf Capital was not in fact obtaining such returns and was in fact losing investor money.

11. As another example, **TRAVIS FORD** falsely stated publicly on or about July 6, 2023, that “[e]verything is safe and I will prove it in the morning to stop all the BS FUD [Fear, Uncertainty, and Doubt] about us scamming, it’s just simple math at this point.” In fact, **TRAVIS FORD** knew that he and his co-conspirators had misappropriated and lost investor funds prior to knowingly making that false statement.

12. **TRAVIS FORD** and his co-conspirators frequently accessed Wolf

Capital's funds and trading accounts holding investor funds to misappropriate and divert Wolf Capital investor funds for their own benefit and to the detriment of Wolf Capital investors.

13. In total, Wolf Capital received approximately \$9.4 million in investments from approximately 2,800 investors.

14. In or around August 2023, **TRAVIS FORD** told investors that he lost their money, and **TRAVIS FORD** and his co-conspirators closed Wolf Capital.

Overt Act

15. In furtherance of the conspiracy and to accomplish its unlawful purpose and objects, on or about August 16, 2023, in the State of Oklahoma, the Northern District of Oklahoma, and elsewhere, **TRAVIS FORD** submitted and caused to be submitted a wire communication, to wit: an electronic funds withdrawal request to a **cryptocurrency** trading platform ("Company 1") holding funds of Wolf Capital investors, from the State of Oklahoma, to Company 1, located outside the State of Oklahoma, to transfer funds to a cryptocurrency wallet used by **TRAVIS FORD**.

All in violation of Title 18, United States Code, Section 371.

FORFEITURE ALLEGATION
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

Upon conviction of the offense alleged in this Information, as a part of his sentence, the defendant, **TRAVIS FORD**, shall forfeit to the United States any property constituting, or derived from, or traceable to, the proceeds obtained, directly or indirectly, as a result of such violation. The property to be forfeited includes, but is not limited to:

MONEY JUDGMENT

1. A money judgment in an amount of at least \$1,039,128.45, representing proceeds obtained by **TRAVIS FORD** as a result of the offense.

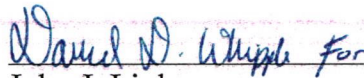
Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1028(g), and Title 28, United States Code, Section 2461(c), the defendant shall forfeit substitute property, up to the value of the property described above if, by any act or omission of the defendant, the property described above, or any portion thereof, 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.

All pursuant to Title 18, United States Code, Section 981(a)(1)(c), and Title 28,
United States Code, Section 2461(c).

By:

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 for

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