



Federal Housing Finance Agency

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FINAL SUSPENSION ORDER

The Federal Housing Finance Agency, as safety and soundness regulator of Fannie Mae, Freddie Mac, and the eleven Federal Home Loan Banks (collectively the “regulated entities”), is issuing this Final Order pursuant to the following legal authorities:

1. Section 1313 of the Federal Housing Enterprises Financial Safety and Soundness Act of 1992 (Safety and Soundness Act), which authorizes FHFA to exercise such incidental powers as may be necessary in the supervision and regulation of the regulated entities. *See* 12 U.S.C. § 4513(a)(2);
2. Section 1313B of the Safety and Soundness Act, which authorizes FHFA to establish standards for the regulated entities regarding prudential management of risks. FHFA is authorized to issue orders requiring the regulated entities to take any action that will best carry out the purposes of that section. *See* 12 U.S.C. § 4513b(b)(2)(B)(iii); and
3. Section 1319G of the Safety and Soundness Act, which authorizes FHFA to issue any orders necessary to ensure that the purposes of the Safety and Soundness Act are accomplished. *See* 12 U.S.C. § 4526(a).

Consistent with these authorities, FHFA has determined that any business relationship between Marietta Terabelian aka “Viktoria Kauichko”, aka “Marietta Abelian” and any of the regulated entities would present excessive risk to their safety and soundness.

This determination is based on the following findings:

1. Marietta Terabelian agreed with co-conspirators to fraudulently obtain federal disaster relief funds distributed through the Paycheck Protection Program (PPP) and the Economic Injury Disaster Loan Program (EIDL).
2. The relevant lending institutions were financial institutions insured by the Federal Deposit Insurance Corporation and approved Small Business Administration (SBA) lenders of PPP loans.
3. Beginning in or about March 2020, Marietta Terabelian agreed with co-conspirators to submit fraudulent PPP and EIDL loan applications, which caused the SBA and SBA-approved lenders, including lenders who were federally-insured financial institutions, to wire loan proceeds to bank accounts in the names of the entities used to obtain such loans.

4. The false and fraudulent information Marietta Terabelian agreed with co-conspirators to provide to those lenders and the SBA included: false applicant names, false information about the number of employees and payroll of the businesses purportedly applying for the loans, and false information about the owners of the bank accounts into which the loan proceeds would be deposited, all of which information was material to the SBA and the lenders.
5. Marietta Terabelian also agreed with co-conspirators to spend the PPP and EIDL fraud proceeds for their own personal benefit, including for expenses prohibited under the requirements of the PPP and EIDL programs, such as the purchase of residential properties.
6. On June 25, 2021, at the conclusion of a federal trial, Marietta Terabelian was convicted by the United States District Court Central District of California of conspiracy to commit bank fraud and wire fraud (18 U.S.C. § 1349), aiding and abetting wire fraud (18 U.S.C. § 1343, 2(a)), aiding and abetting bank fraud, and causing an act of bank fraud to be done (18 U.S.C. § 1344, 2(a), 2(b)), and money laundering conspiracy (18 U.S.C. § 1956(h)) and was sentenced to six (6) years in prison and five (5) years of supervised release.
7. The conduct underlying the conviction described above occurred in connection with financial transactions.

With this Final Order, FHFA is directing each regulated entity to cease or refrain from engaging in any business relationship with Marietta Terabelian indefinitely, beginning on January 10, 2024. This suspension extends to any individual, company, partnership or other group that FHFA determines to be an affiliate of Marietta Terabelian's.

The Final Order's requirement for regulated entities to cease any business relationship with Marietta Terabelian does not apply to the existing or future purchase, sale, modification, foreclosure alternative transaction, or other foreclosure-related transaction of a residential mortgage loan owned by a regulated entity if Marietta Terabelian is the borrower of such residential mortgage loan and the transaction is for the borrower's own personal or household residence.

This Final Order is a final action of the Federal Housing Finance Agency.

Clinton Jones,
Suspending Official