DECLARATION OF TIMOTHY MASSINO

I, Timothy Massino, hereby declare and state as follows:

I am special agent with the Small Business Administration, Office of Inspector General ("SBA-OIG"). The SBA-OIG is one of the federal agencies charged with investigating fraud related to the Paycheck Protection Program ("PPP") and the Economic Injury Disaster Loan ("EIDL") program. I am one of the agents assigned to the investigation that resulted the indictment and first superseding indictment in United States v. Richard Ayvazyan, 20-579(A). I am basing this declaration on my personal observations and information obtained from various law enforcement personnel and witnesses during the course of this investigation. As a result of my involvement in this investigation, I know the following and could and would testify to those facts fully and truthfully if called and sworn as a witness:

1. In June 2020, the government opened an investigation into a Los Angeles-based ring that was using stolen, fake, and synthetic identities to fraudulently apply for benefits under the PPP and EIDL programs, two relief programs which were enacted as part of the Coronavirus Aid, Relief, and Economic Security Act (the "CARES Act") to assist businesses that had been impacted by the COVID-19 pandemic.

2. The original subjects of the investigation included "Iuliia Zhadko," who submitted fraudulent loan applications on behalf of Top Quality Contracting and Turing Info Solutions.

3. Among other things, the driver's license submitted in support of Zhadko's applications was fake.

4. Over the next four months, the government obtained information from federal and state agencies, lenders, retail banks,

and escrow companies, among others, and issued over 200 grand jury subpoenas.

5. The government identified additional fraudulent loan applications, including one that "Viktoria Kauichko" submitted on behalf of Runyan Tax Services.

6. The government traced the funds that were received from the fraudulent loans and learned the proceeds were funneled through various bank accounts, including one in Marietta Terabelian's name, and had been used by Terabelian's husband, Richard Ayvazyan, to purchase luxury homes, including a $3.25 million mansion, the title for which was held in the names of Marietta Terabelian and Richard Ayvazyan.

7. The government identified Marietta Terabelian and Richard Ayvazyan as targets and submitted their names to the Department of Homeland Security ("DHS") TECS System, which provides travel alerts.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Los Angeles, California, on March 15, 2021.

TIMOTHY MASSINO