

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF GEORGIA

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

GEORGE IAKOVOU,  
VIKA VENTURES LLC,  
PENELOPE ZBRAVOS,

Defendants.

Case No. 4:22-cv-194-CDL

**FINAL JUDGMENT AS TO DEFENDANT PENELOPE ZBRAVOS**

The Securities and Exchange Commission having filed a Complaint and Defendant Penelope Zbravos (“Zbravos” or “Defendant”) having entered a general appearance; consented to the Court’s jurisdiction over Defendant and the subject matter of this action; consented to entry of this Final Judgment without admitting or denying the allegations of the Complaint (except as to jurisdiction and except as otherwise provided herein in paragraphs II and IV); waived findings of fact and conclusions of law; and waived any right to appeal from this Final Judgment, the Court hereby **GRANTS** the Unopposed Motion to Enter Final Judgment as to Defendant Penelope Zbravos and further orders:

**I.**

**SECTION 17(a)(3) OF THE SECURITIES ACT OF 1933**

IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that Defendant is permanently restrained and enjoined from violating Section 17(a)(3) of the Securities Act of

1933 (the “Securities Act”) [15 U.S.C. § 77q(a)(3)] in the offer or sale of any security by the use of any means or instruments of transportation or communication in interstate commerce or by use of the mails, directly or indirectly to engage in any transaction, practice, or course of business which operates or would operate as a fraud or deceit upon the purchaser, with respect to: i. the use of investor funds; ii. the purchase of any security; iii. the misappropriation of investor funds or investment proceeds; iv. the Defendant’s qualifications to support any enterprise that advises investors, receives investor funds, or offers for sale any security; or v. the Defendant’s continued participation in a business once the Defendant becomes aware that it is fraudulent.

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that, as provided in Federal Rule of Civil Procedure 65(d)(2), the foregoing paragraph also binds the following who receive actual notice of this Judgment by personal service or otherwise: (a) Defendant’s officers, agents, servants, employees, and attorneys; and (b) other persons in active concert or participation with Defendant or with anyone described in (a).

## II.

### **INCORPORATION OF THE DEFENDANT’S CONSENT**

IT IS FURTHER ORDERED, ADJUDGED, AND DECREED that Defendant’s Consent [D.E. 2] is incorporated herein with the same force and effect as if fully set forth herein, and that Defendant shall comply with all of the undertakings and agreements set forth therein.

**III.**

**DISGORGEMENT**

IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that Defendant is liable for disgorgement of \$1,810,000 representing the net profits gained as a result of the conduct alleged in the Complaint, and prejudgment interest thereon of \$33,472.09, for a total of \$1,843,472.09, pursuant to Exchange Act Sections 21(d)(5) and (7) [15 U.S.C. §§78u(d)(5) and (7)].

IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that Defendant's disgorgement and prejudgment interest of \$1,843,472.09 is **deemed satisfied** by the Restitution ordered against Defendant in *United States v. Iakovou et al.*, Case No. 4:22-CR-28 (M.D. Ga., filed Nov. 9, 2022).

**IV.**

**CIVIL PENALTY CLAIM**

IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that the Securities and Exchange Commission's claim for a civil penalty as to Zbravos is dismissed.

**V.**

**RETENTION OF JURISDICTION**

IT IS HEREBY FURTHER ORDERED, ADJUDGED, AND DECREED that this Court shall retain jurisdiction of this matter for the purposes of enforcing the terms of this Final Judgment.

VI.

**FEDERAL RULE OF CIVIL PROCEDURE 54(b)**

There being no just reason for delay, pursuant to Rule 54(b) of the Federal Rules of Civil Procedure, the Clerk is ordered to enter this Judgment forthwith and without further notice.

Dated: July 8, 2024

S/Clay D. Land

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**THE HONORABLE CLAY D. LAND  
UNITED STATES DISTRICT JUDGE**