



# 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 Complete Escrow Services, LLC and the regulated entities would present excessive risk to their safety and soundness.

This determination is based on the following findings:

1. Complete Escrow Services, LLC is a limited liability corporation registered and incorporated in the states of Ohio and Pennsylvania. The corporation’s registered agent as of October 2023 is Incorp Services, Inc. in the state of Ohio.
2. Complete Escrow Services, LLC was, during all relevant times, an affiliate of Lee Ann Benninghoff, as that term is defined in the Suspended Counterparty Program regulation at 12 CFR 1227.2, because Benninghoff directly or indirectly controlled this entity.
3. From February 2014 through March 2017, Benninghoff conspired with others to submit fraudulent gift letters in support of mortgage loan applications. The gift letters misrepresented the source of the funds and their purported purpose.
4. On March 16, 2023, pursuant to a guilty plea, Lee Ann Benninghoff was convicted by the United States District Court for the Western District of Pennsylvania of conspiracy to commit mail fraud and bank fraud and was sentenced to one (1) day imprisonment and two (2) years of supervised release.

5. The conduct underlying the conviction described above occurred in connection with a mortgage business and financial transactions.

With this Final Order, FHFA is directing each regulated entity to cease or refrain from engaging in any business relationship with Complete Escrow Services, LLC indefinitely, beginning on December 31, 2023. This suspension extends to any individual, company, partnership or other group that FHFA determines to be an affiliate of Complete Escrow Services, LLC's.

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

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Clinton Jones,  
Suspending Official