



# 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 (the “regulated entities”), is issuing this Final Order pursuant to the following legal authorities:

1. Section 1313B of the Federal Housing Enterprises Financial Safety and Soundness Act of 1992 (Safety and Soundness Act) 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).
2. Section 1319G of the Safety and Soundness Act 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).
3. Section 1313 of the Safety and Soundness Act authorizes FHFA to exercise such incidental powers as may be necessary in the supervision and regulation of each regulated entity. *See* 12 U.S.C. 4513(a)(2).

Consistent with these authorities, FHFA has determined that any business relationship between Rodrigo Ariel Pardo and a regulated entity would present excessive risk to the safety and soundness of the regulated entity.

This determination is based on the following findings:

1. Rodrigo Ariel Pardo was a licensed realtor who had worked at two different real estate brokerages.
2. Rodrigo Ariel Pardo and a co-conspirator held themselves out as loan modification specialists to their clients. With at least some clients, Mr. Pardo also falsely claimed he was an attorney.
3. Rodrigo Ariel Pardo and co-conspirators knowingly executed and attempted to execute a scheme and artifice to defraud and to obtain moneys, funds, credits, assets, and securities owned by and under the custody and control of multiple financial institutions by means of materially false and fraudulent pretenses, representations, promises and omissions.

4. On March 1, 2019, Rodrigo Ariel Pardo was sentenced by the United States District Court, Eastern District of Virginia, Alexandria for Conspiracy to Commit Wire and Bank Fraud to imprisonment for a term of twenty-one (21) months and three (3) years of supervised release.
5. On July 16, 2019, Rodrigo Ariel Pardo was debarred from the U.S. Department of Housing and Urban Development (HUD) and excluded from procurement and non-procurement transactions, as either a principal or participant, with HUD and throughout the Executive Branch of the Federal Government for a five-year period.
6. The conduct above occurred in connection with real estate and financial transactions.

With this Final Order, FHFA is directing each regulated entity to cease any business relationship with Rodrigo Ariel Pardo for ten (10) years, beginning on May 3, 2021. This suspension extends to any individual, company, partnership or other group that FHFA determines to be an affiliate of Rodrigo Ariel Pardo.

The Final Order's requirement for regulated entities to cease any business relationship with Rodrigo Ariel Pardo 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 Rodrigo Ariel Pardo 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.

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Alfred M. Pollard,  
Suspending Official, *by Delegation*.