



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 Treshell Herndon 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. On April 17, 2015, the United States Department of Housing and Urban Development (HUD) proposed that Treshell Herndon be debarred from future participation in procurement and nonprocurement transactions as a participant or principal, with HUD and throughout the Executive Branch of the Federal Government, for an indefinite period.
2. According to the HUD Notice of Proposed Debarment, the proposed debarment of Treshell Herndon was based upon her conviction in the United States District Court for the Eastern District of North Carolina for violation of 18 U.S.C. 1349 (Conspiracy to Commit Mail, Wire and Bank Fraud). Specially, Treshell Herndon recruited unqualified straw buyers to purchase properties she knew they could not afford. In addition, Treshell Herndon made it appear to banks and other lenders that buyers had the financial means to

repay their mortgage loans, and to make the necessary down payment at the time of the closing, thereby misleading banks and lenders, among others, into issuing loans they would not otherwise have authorized.

3. On July 2, 2015, the debarment of Treshell Herndon became final and she was excluded from procurement and nonprocurement transactions, as either a principal or participant, with HUD and throughout the Executive Branch of the Federal Government for an indefinite period.

With this Final Order, FHFA is directing each regulated entity to cease any business relationship with Treshell Herndon indefinitely, beginning on February 8, 2019. This suspension extends to any individual, company, partnership or other group that FHFA determines to be an affiliate of Treshell Herndon.

The Final Order's requirement for regulated entities to cease any business relationship with Treshell Herndon 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 Treshell Herndon 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.


Alfred M. Pollard, Suspending Official

12-21-2018
Date: