



Federal Housing Finance Agency

Constitution Center

400 7th Street, S.W.

Washington, D.C. 20219

Telephone: (202) 649-3800

Facsimile: (202) 649-1071

www.FHFA.gov

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, as amended by the Housing and Economic Recovery Act of 2008 (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).
4. 12 CFR § 1227.6, which outlines the grounds for issuance of a final suspension order and the factors that may be considered by the suspending official.

Consistent with these authorities, FHFA has determined it is appropriate to prohibit the regulated entities from engaging in any business relationship with Apex Title Agency Incorporated.

This determination is based on the following findings:

1. Dora Ameneiro Martinez was a resident of Polk County, Florida, a licensed real estate title agent in the State of Florida, and owner of Apex Title Agency Incorporated, a title company in Haines City, Florida.
2. Apex Title Agency Incorporated is an affiliate of Martinez, as that term is defined at 12 CFR 1227.2, because Martinez owned, operated, and controlled this organization.
3. Between June 2019 and July 2022, Martinez participated in approximately 30 fraudulent real estate transactions.
4. Martinez made false and fraudulent statements to a Federal Deposit Insurance Corporation (“FDIC”) insured financial institution and to various non-FDIC insured

private mortgage lenders to defraud them into approving mortgages and lending money.

5. In one version of her scheme, Martinez falsely and fraudulently concealed existing mortgages in title paperwork and closing disclosures. In doing so, she induced lenders to fund mortgage loans with the belief they would be in the first position with respect to repayment. However, in actuality, the lenders held inferior lien positions relative to the lenders for the existing, undisclosed mortgages.
6. Relying on these misrepresentations, the financial institution and private mortgage lenders made loans based on the erroneous belief that the mortgages were secured by properties that were unencumbered.
7. In another scheme, Martinez falsely and fraudulently applied for and processed a mortgage refinancing loan and, upon receipt of the new refinanced mortgage loan funds as the settlement agent, failed to pay off the existing mortgage and diverted the proceeds for her own personal use. The lender would not have lent the money to Martinez if it had known that Martinez did not intend to immediately pay off the existing mortgage in accordance with the closing disclosure.
8. Based on this misconduct and pursuant to a guilty plea on March 4, 2024, Martinez was convicted by the United States District Court for the Southern District of Florida of bank fraud and was sentenced to three years of imprisonment followed by five years of supervised release.
9. The conduct underlying the conviction described above occurred in connection with mortgages and a mortgage business.
10. The above-referenced conviction constitutes covered misconduct, as that term is defined at 12 CFR 1227.2, and is of a type that would be likely to cause significant financial or reputational harm to a regulated entity or otherwise threaten the safe and sound operation of a regulated entity.

With this Final Order, FHFA is directing each regulated entity to indefinitely cease or refrain from engaging in any business relationship with Apex Title Agency Incorporated, beginning on December 10, 2025.

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

Clinton Jones,
Suspending Official