



Federal Housing Finance Agency

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FINAL SUSPENSION ORDER

The Federal Housing Finance Agency (“FHFA”), as safety and soundness regulator of the Federal National Mortgage Association (“Fannie Mae”), Federal Home Loan Mortgage Corporation (“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, Pub. L. No. 110-289, 122 Stat. 2654 (codified as 12 U.S.C. § 4511 et seq.), (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).
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 that any business relationship between Results Home Buyers 2, LLC (“Results Home”) and any of the regulated entities would present excessive risk to their safety and soundness.

This determination is based on the following findings:

1. Brandon John Zanotti (“Zanotti”) is a former Williamson County State’s Attorney, licensed to practice law in Illinois.
2. Zanotti owned seven commercial rental properties located in Williamson and Franklin Counties, Illinois through Results Home, a company he was a part owner of.
3. Results Home is an affiliate Zanotti, as that term is defined at 12 CFR 1227.2, because Zanotti controlled this organization as demonstrated by his use of the organization to facilitate the scheme detailed below.

4. During 2022, Zanotti, through Results Home, entered into an agreement to sell seven commercial rental properties to a buyer (the “Buyer”) that financed the full purchase price of the properties through a loan from SouthernTrust Bank (the “Bank”).
5. It was understood by Zanotti and the other parties to the transaction including the then the Bank’s president, that the proposed transaction was a new real estate purchase, not a refinance, and that the buyers would not provide any cash downpayment. Instead, the entire purchase would be funded through the Bank loan proceeds. However, in order to facilitate the transaction, Zanotti and others submitted false paperwork to the Bank including a sham Assignment of Beneficial Interest regarding the ownership of the properties, a falsely backdated Purchase and Sales Agreement reflecting an inflated purchase price, and a false Credit Approval Form, which falsely reflected a cash downpayment from the Buyers. Zanotti and the other parties knew the actual purchase price was lower. These false records were maintained in the Bank’s books and records.
6. On August 12, 2022, the Bank’s president funded the sham “refinance” transaction at 80% of the false purchase price resulting in a total payout to Results Home, based on false information.
7. Based on this misconduct and pursuant to a guilty plea, on May 15, 2024, Zanotti was convicted by the United States District Court for the Southern District of Illinois of false entry in bank records and was sentenced to two (2) years of probation. However, on June 5, 2025, the Court granted early termination of Zanotti’s probation.
8. On March 19, 2025, Zanotti was prohibited for ten (10) years under Section 19 of the Federal Deposit Insurance Act by the Federal Deposit Insurance Corporation from becoming or continuing as an institution-affiliated party with respect to any insured depository institution; owning or controlling, directly or indirectly, any insured depository institution; or otherwise participating, directly or indirectly, in the conduct of the affairs of any insured depository institution.
9. The conduct underlying the conviction described above occurred in connection with a mortgage business and real estate lending products and involved making false statements or claims.
10. The above-referenced conviction constitutes covered misconduct, as that term is defined at 12 CFR 1227.2, that 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 cease or refrain from engaging in any business relationship with Results Home Buyers 2, LLC indefinitely, beginning on March 4, 2026.

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

Clinton Jones,
Suspending Official