

# Multifamily Selling and Servicing Guide

Effective as of August 29, 2025

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## **Section 505** Compliance

## ▼ Requirements

#### You must:

- maintain effective OFAC compliance procedures;
- monthly screen:
  - the Borrower, Key Principal, Guarantor, and Principals for Potential Red Flags for Mortgage Fraud and Other Suspicious Activity; and
  - all Persons per Part I, Chapter 3: Borrower, Guarantor, Key Principals, and Principals, Section 310: Compliance; and
- report:
  - all unresolved red flags per Part I, Chapter 3: Borrower, Guarantor, Key Principals, and Principals, Section 310: Compliance; and

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 within 24 hours, any Blocked Person to Lender Assessment Oversight.



# **Glossary**

## B

**Blocked Person** 

Any Person who is:

- on the FHFA SCP List;
- sanctioned or blocked by OFAC; or
- identified on:
- HUD's "Limited Denial of Participation, HUD Funding Disqualifications and Voluntary Abstentions List"; or
- General Services Administration's "System for Award Management (SAM) exclusion list".

Borrower

Person who is the obligor per the Note.

## **Synonyms**

- Borrowers
- Borrower's

G

Guarantor

Key Principal or other Person executing a

- Payment Guaranty,
- · Non-Recourse Guaranty, or
- any other Mortgage Loan guaranty.

## **Synonyms**

Guarantors

K

**Key Principal** 

Person who

- controls and/or manages the Borrower or the Property,
- is critical to the successful operation and management of the Borrower and the Property, and/or

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• may be required to provide a Guaranty.

#### **Synonyms**

- Key Principals
- Key Principal's



 $\mathbf{L}$ 

Lender Assessment

Oversight

Team that can be contacted at

 $lender assessment\_over sight team @fanniemae.com.\\$ 

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**OFAC** 

U.S. Treasury Department, Office of Foreign Assets

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Control.