

Order No. 2024-028

IN THE MATTER OF:

ANDREA RENE DODD

HUBBARD, TEXAS

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BEFORE THE BANKING

COMMISSIONER OF TEXAS

AUSTIN, TRAVIS COUNTY, TEXAS

CONSENT ORDER

On this day, the matter of ANDREA RENE DODD of Hubbard, Texas (“Respondent”) was submitted to me, Charles G. Cooper, Banking Commissioner of the State of Texas (“Commissioner”), for consideration and action.

1. Respondent is a former employee of Community Bank & Trust (“Bank”). Respondent held the position of loan assistant in the Bank’s branch located at 8820 Chapel Road Waco, TX until her resignation from the Bank on February 27, 2023.

2. The Bank is chartered in Texas under charter number 1816-26.

3. The Bank and Respondent are, and at all times pertinent to the allegations in this proceeding were, subject to the provisions of the Texas Banking Act (“Banking Act”), Texas Finance Code (“Finance Code”) Title 3, Subtitle A.

4. Pursuant to Finance Code, Chapter 31 and 35, the Commissioner has jurisdiction over Respondent and the subject matter of this proceeding, and is authorized to bring this enforcement action pursuant to Finance code §§ 31.201, 35.002, and 35.009.

5. The Commissioner has the authority to issue this Consent Order prohibiting further participation (“Order”) pursuant to Finance Code § 31.201(d) and Texas Government Code (“Government Code”) § 2001.056(3).

6. Respondent has been properly notified of her right to an administrative hearing and

judicial review of administrative actions under Finance Code §§ 35.004 and Government Code §§ 2001.051 and 2001.71. Respondent waives these rights and agrees to the disposition of this matter pursuant to the provisions of Finance Code § 31.20(d) and Government Code § 2001.056.

7. Respondent and the Commissioner agree to this Order solely for the purpose of this proceeding, and without Respondent admitting or denying any facts contained herein, or any violations of law or regulations. This Order does not constitute an admission by Respondent that the Banking Act, or a rule adopted, or order issued under the Banking Act, has been violated.

8. For purposes of this proceeding, Respondent knowingly and voluntarily waives:

- a. service upon Respondent of this Order;
- b. the right to present defenses to the allegations in this proceeding;
- c. notice and hearing prior to imposition of this Order;
- d. the filing of proposed findings of fact and conclusions of law;
- e. the issuance of a proposal for decision by an administrative law judge;
- f. the filing of exceptions and briefs with respect to such proposal for decision;
- g. any review of this Order by the Texas Finance Commission (“Finance Commission”);
- h. judicial review of this Order as provided by Texas Government Code § 2001.171 *et seq.*; and
- i. any other challenges to the validity of this Order.

9. This Order resolves all matters between the Department, the Commissioner or the Finance Commission, and Respondent with respect to Respondent’s activities while employed at the Bank that are known to the Department as of the date of this Order. Any violation of this Order could subject Respondent to additional regulatory or enforcement actions authorized by the

Finance Code and other provisions of Texas law. Nothing in this Order diminishes the regulatory or enforcement powers of the Texas Department of Banking (“Department”), the Commissioner, the Finance Commission, or other applicable law.

10. The Commissioner has considered this matter and, based upon credible evidence, reasonably believes that Respondent’s actions satisfy the statutory requirements for the issuance of this Order as set forth in Finance Code § 35.003.

11. The Commissioner has further considered the matter and finds as follows:

- a. Between approximately January 2021 and February 2023, while employed at the Bank, Respondent embezzled funds from customers’ bank accounts.
- b. Respondent’s actions included fraudulent withdrawals and debits from customer accounts to cover fraudulent cashier’s checks. Most of the fraudulent transactions were completed after normal business hours and through drive-thru tellers.
- c. The Bank found inconsistencies in deposits and loan payments to customer accounts conducted by the Respondent. Specifically, account transactions show a customer gave the Respondent \$18,000 in cash for deposits and loan payments but only \$16,972.10 was posted to the customer’s account.
- d. Respondent reversed loan payments made by a customer and cashed out the funds as a cashier’s check.
- e. Respondent manipulated a loan in process that was recorded for \$5,000 by crediting the customer \$4,529 and issuing the difference as a cashier’s check. The cashier’s check was subsequently cashed after business hours.
- f. The Respondent embezzled a total of \$15,141.39 from the Bank.

company of a state bank, or a state trust company, or as director, officer, or employee with financial responsibility of any other entity chartered, registered, permitted, or licensed by the banking Commissioner under the laws of this state;

- b. Directly or indirectly participating in any manner in the management of such entity;
- c. Directly or indirectly voting for a director of such entity; or
- d. Soliciting, procuring, transferring, attempting to transfer, voting, or attempting to vote any proxy, consent, or authorization with respect to voting rights in such an entity.

Effective Date

This Order is effective on the date signed by the Commissioner and is final and non-appealable as of that date. The Commissioner may enforce this Order pursuant to Finance Code §§ 35.003 and 35.009. If the Commissioner has reason to believe that Respondent has violated or is about to violate a provision of this Order, the Commissioner may take appropriate action authorized under Finance Code § 35.009. The provisions of this Order will remain effective and will be enforced until such time as the provisions shall have been modified, terminated, suspended, or set aside in accordance with Finance Code § 35.0071.

Signed on this 21st day of March, 2025.

/s/ Charles G. Cooper

Charles G. Cooper
Commissioner, Department of Banking

AGREED AND APPROVED AS TO FORM AND SUBSTANCE:

/s/ Andrea Renee Dodd
Andrea Renee Dodd
Respondent

State of Texas §
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County of McLennan §

Sworn to and subscribed before me on the 19 day of Feb, 2025, by Andrea Renee
Dodd.

/s/ Elaine R. Carrington
Notary Public

APPROVED AS TO FORM:

/s/ Shanice Pommells
Shanice Pommells
Assistant General Counsel
Texas Department of Banking
Date: 03/21/2025