Order No. 2026-018

IN THE MATTER OF:	§	**BEFORE:**
	§	
JESSE ROMO	§	**THE BANKING**
	§	**COMMISSIONER OF TEXAS**
	§	
SAN ANTONIO, TEXAS	§	**AUSTIN, TRAVIS COUNTY, TEXAS**

CONSENT ORDER PROHIBITING FURTHER PARTICIPATION

On this day, the matter of JESSE ROMO of San Antonio, 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 Frost Bank ("Bank"). Respondent held the position of Personal Banker in the Bank's South Central Financial Center located at 515 SW Military Dr, San Antonio, Texas until his termination from the Bank on February 28, 2025.

2. The Bank is chartered in Texas under the charter number 3202-20.

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, Chapters 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 § 35.003.

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 his right to an administrative hearing and judicial review of administrative action under Finance Code § 35.004 and Government Code §§ 2001.051 and 2001.171. Respondent waives these rights and agrees to the disposition of this matter pursuant to the provisions of Finance Code § 31.201(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 laws 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. judicial review of this Order as provided by Texas Government Code § 2001.171 *et seq*.; and

h. any other challenges to the validity of this Order.

9. This Order resolves all matters between the Texas Department of Banking ("Department"), the Commissioner, 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 Department, the Commissioner, 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. Specifically, the Commissioner finds as follows:

a. Over multiple months, Respondent opened numerous accounts in his name and in the name of another individual without their consent. These accounts had no deposits, and Respondent overdrew funds varying from $150 to $1,250.

b. Respondent's activity resulted in a total of loss to the bank of $17,665.

12. Based upon the findings above, the Commissioner has determined that Respondent:

a. Intentionally engaged in a breach of trust or other fiduciary duty, and made, or caused to be made, false entries in the records of the Bank; and

b. Because of Respondent's actions, the Bank suffered a financial loss, the interests of the depositors, creditors, and/or shareholders were or could have been prejudiced, and Respondent received financial gain by reason of the action; and

c. Respondent's actions involved personal dishonesty and demonstrated a wilful or continuing disregard for the safety and soundness of the Bank.

13. Pursuant to Finance Code § 35.003, the Commissioner finds there are grounds to prohibit Respondent from office or employment in, or further participation in, the affairs of a state bank or any other entity chartered, registered, permitted, or licensed by the Commissioner.

14. Respondent consents to the issuance of this Order and agrees to comply with the terms that are set out in the Order below.

Order of Prohibition

It is hereby ORDERED, ADJUDGED, and DECREED that, pursuant to Finance Code §§ 35.003 and 35.007, without prior written approval of the Commissioner, Respondent is perpetually prohibited from:

a. Serving as a director, officer, or employee of a state bank, a holding 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 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 will likely 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 applicable law.

It is so ORDERED.

Signed on this 23rd day of September, 2026.

/s/ Charles G. Cooper
Charles G. Cooper
Commissioner, Department of Banking

AGREED AND APPROVED AS TO FORM AND SUBSTANCE:

/s/ Jesse Romo
Jesse Romo
Respondent

State of Texas §
§
County of Bexar §

Sworn to and subscribed before me on the 4th day of September, 2026, by Jesse Romo.

(S E A L)

/s/ Pearl Buentello
Notary Public