

UNITED STATES OF AMERICA
BEFORE THE
BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM
WASHINGTON, D.C.

In the Matter of

ORLANDO ROMERO

An Institution-Affiliated Party of
DEUTSCHE BANK AG
NEW YORK BRANCH
New York, New York

Docket No. 22-002-B-I

Order to Cease and Desist Issued
Upon Consent Pursuant to
Section 8(b) of the Federal Deposit
Insurance Act, as Amended

WHEREAS, the Board of Governors of the Federal Reserve System (the “Board of Governors”), pursuant to section 8(b) of the Federal Deposit Insurance Act, as amended (the “FDI Act”), 12 U.S.C. § 1818(b), issues this Order to Cease and Desist (this “Order”) upon the consent of Orlando Romero (“Romero”), a former employee and institution-affiliated party, as defined in section 3(u) and 8(b)(4) of the FDI Act, 12 U.S.C. § 1813(u) and 1818(b)(4), of the New York Branch of Deutsche Bank AG, a foreign bank as defined by section 1(b)(7) of the International Banking Act, 12 U.S.C. § 3101(7), and subject to the supervision of the Board of Governors under 12 U.S.C. § 1813(q), that conducts operations in the United States through various branches, offices and subsidiaries (collectively, the “Bank”);

WHEREAS, in 2018, while employed at the Bank as a Client Service Specialist in the division of Global Technology, Romero altered the proposed annual base salary in an offer letter he received from a competing financial institution, and provided that offer letter containing the altered salary to the Bank in an effort to increase his annual base salary;

WHEREAS, the Bank in December 2018 matched the altered salary from the competing financial institution and increased Romero's annual base salary by approximately \$28,000, which continued to be his annual base salary until his resignation in June 2020;

WHEREAS, the Bank sustained a loss of in the amount of the increased annual base salary as a result of Romero's misconduct;

WHEREAS, Romero's misconduct violated the Bank's internal policies and constituted violations of law or regulation, unsafe or unsound practices, or breaches of fiduciary duty; and

WHEREAS, by affixing his signature hereunder, Romero has consented to the issuance of this Order by the Board of Governors and has agreed to comply with each and every provision of this Order, and has waived any and all rights he might have pursuant to 12 U.S.C. § 1818, 12 CFR Part 263, or otherwise: (a) to contest the issuance of a cease-and-desist order on any matter implied or set forth in this Order; (b) to request a hearing for the purpose of taking evidence with respect to any matter implied or set forth in this Order; (c) to obtain judicial review of this Order or any provision hereof; and (d) to challenge or contest in any manner the basis, issuance, terms, validity, effectiveness, or enforceability of this Order or any provision hereof.

NOW THEREFORE, before the filing of any notices, or the taking of any testimony or adjudication of or finding on any issue of fact or law herein, and without Romero admitting or denying any allegation made or implied by the Board of Governors in connection herewith, and solely for the purpose of settlement of this matter without a formal proceeding being filed and without the necessity for protracted litigation or extended hearings,

IT IS HEREBY ORDERED,

Cease and Desist

1. Pursuant to section 8(b) of the FDI Act, 12 U.S.C. § 1818(b), that prior to accepting any position that would cause Romero to become an institution-affiliated party, or upon execution of this Order if Romero is currently an institution-affiliated party, as defined in sections 3(u), 8(b)(3), and 8(b)(4) of the FDI Act, 12 U.S.C. §§ 1813(u) and 1818(b)(3) and (4), of any institution or agency described in section 8(e)(7)(A) of the FDI Act, 12 U.S.C. § 1818(e)(7)(A), including, but not limited to, any insured depository institution or any holding company of an insured depository institution, or any subsidiary of such holding company, or any foreign bank or company to which subsection (a) of 12 U.S.C. § 3106 applies and any subsidiary of such foreign bank or company, Romero shall:

(a) provide the Managing Director/Senior Vice President or equivalent level in the reporting line of the institution with notice and a copy of this Order;

(b) fully familiarize himself with the policies and procedures of the institution that pertain to his duties and responsibilities, including, but not limited to, the employee Code of Conduct, and

(c) within ten (10) days after his acceptance of any position, or execution of this Order, as described in this paragraph, provide written notice to the Board of Governors, along with a written certification of his compliance with each provision of this paragraph.

2. In connection with Romero's current or future status as an institution-affiliated party, as defined in sections 3(u), 8(b)(3), and 8(b)(4) of the FDI Act, 12 U.S.C. §§ 1813(u) and 1818(b)(3) and (4), Romero shall:

- (a) fully comply with all applicable laws, rules, regulations, policies, and procedures;
- (b) not engage in any unsafe or unsound practice; and
- (c) fully observe his fiduciary duties.

Notices

3. All communications regarding this Order shall be addressed to:

- (a) Richard M. Ashton, Esq.
Deputy General Counsel
David Williams, Esq.
Associate General Counsel
Board of Governors of
the Federal Reserve System
20th & C Streets NW
Washington, DC 20551
- (b) Orlando Romero

Miscellaneous

4. Any violation of this Order shall separately subject Romero to appropriate civil penalties under section 8(i) of the FDI Act, 12 U.S.C § 1818(i).

5. The provisions of this Order shall not bar, estop, or otherwise prevent the Board of Governors, or any other Federal or state agency or department, from taking any other action affecting Romero; provided, however, that the Board of Governors shall not take any further action against Romero on any matters concerning or arising from the matters addressed by this Order based upon facts presently known by the Board of Governors. This release and discharge shall not preclude or affect (i) any right of the Board of Governors to determine and ensure compliance with this Order, or (ii) any proceedings brought by the Board of Governors to enforce the terms of this Order.

6. Each provision of this Order shall remain fully effective and enforceable until expressly stayed, modified, terminated, or suspended in writing by the Board of Governors.

By order of the Board of Governors of the Federal Reserve System, effective this 9th day of May, 2022.

BOARD OF GOVERNORS OF THE
FEDERAL RESERVE SYSTEM

_____/s/_____
Orlando Romero

By: _____/s/_____
Ann E. Misback
Secretary of the Board