

From: [Todd Grayson](#)
To: [Comments](#)
Cc: [David G. Schroeder \(davids@cbai.com\)](mailto:davids@cbai.com)
Subject: [EXTERNAL MESSAGE] June 20, 2025-Request for Information On Potential Actions To Address Payments Fraud; Comment Request (RIN 3064-ZA49)
Date: Wednesday, September 17, 2025 12:04:21 PM
Attachments: [image.png](#)

Ms. Jennifer M. Jones
Deputy Executive Secretary
Attention: Comments—RIN 3064-ZA49
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Dear Ms. Jones, Mr. McDonough, and Mr. Gould:

I am Todd Grayson, currently Chief Operating Officer of American Metro Bank in Chicago, and former President of South Central Bank, NA and a former Chairman of the Community Bankers Association of Illinois.

I have answered some of the questions in your RFI and have labeled them by question number.

Overall, payment fraud is large and growing. It can almost be calculated by the number of transactions a bank has. More checks, more check fraud; more ACHs, more ACH fraud, more debit card transactions, more debit card fraud.

An overriding similarity to all of this fraud is that the financial institutions and the merchants who receive the payments have no incentive to review the veracity of the payment. With credit cards, they take a hit. With all of these types of fraud, the onus is on the victim of the fraud and their financial institution, often a community bank, to find it, chase it and collect the funds. And the big banks don't care. It's a math problem to them, just as credit card defaults are a math problem.

Here are the answers.

Q.2. What is very important when it comes to collaboration is communicating what has been done and how to work with the agencies or other stakeholders in regard to these new initiatives (such as FraudClassifier and ScamClassifier).

I am sure that information is being shared specifically to payments professionals through industry conferences and communications for payments professionals. These events and documents generally go to larger banks as smaller banks have too many constraints to visit every conference.

So, I ask that in conversations between examiners and bankers either during bank exams or during normal quarterly or annual conversations, that any activity that examiners are doing to help bankers in this area gets communicated at that time.

Q. 6. Additional education to consumers and businesses would be helpful. I do not believe anyone outside of the industry knows about ACH fraud. And debit card fraud also needs more education. Most consumers do not know the difference between paying with a credit card and a debit card. The large banks may be able to cover a debit card transaction loss, but if the merchant does not take responsibility, it is important for the consumer to know that they are at risk for debit card fraud on a regular basis.

Additionally, rural customers, some urban customers and seniors need to have this education in a manner which they can understand and is available to them. Often policy makers assume that everyone has similar education, access to information and sophistication as they do. In bank materials would be helpful.

Q.10. Payments fraud regulations and examiner expectations need to be tailored to community banks with appropriate requirements and guidelines to improve safety and soundness while not adding additional burdens on community banks.

Q.13. Check fraud continues to be an issue for community banks. We are concerned that some large financial institutions are not exercising the CIP/KYC processes and opening accounts that are being used by criminals.

ACH fraud is also an issue as credit card banks do not check to see if the account their customer is drawing funds from to pay bills, is – in fact – their account.

Thank you,

Todd E. Grayson

Chief Operating Officer

American Metro Bank

Direct: [REDACTED]

[REDACTED]



"Helping our Community Prosper"

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