

[REDACTED]

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**From:** Angie Kasella <[REDACTED]>  
**Sent:** Monday, September 8, 2025 10:57 AM  
**To:** Comments  
**Subject:** [EXTERNAL MESSAGE] June 20, 2025-Request for Information On Potential Actions To Address Payments Fraud; Comment Request (RIN 3064-ZA49)

[REDACTED]

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 serve as the Senior Operations Manager at Citizens Alliance Bank, a \$1.4 billion community bank headquartered in Clara City, Minnesota. I am writing in response to the joint Request for Information issued by the Office of the Comptroller of the Currency, the Board of Governors of the Federal Reserve System, and the Federal Deposit Insurance Corporation regarding payments fraud.

As a community banker, I appreciate the opportunity to comment on the interagency Request for Information regarding mitigating payments fraud. I strongly support the Independent Community Bankers of America's advocacy for collaborative, tailored, and effective fraud mitigation strategies that reflect the unique challenges faced by community banks.

Our institution has experienced a significant increase in fraud attempts and losses across multiple payment channels. Below are recent examples that highlight the urgency of this issue:

**Digital Banking Takeover**

09/30/2024 – 01/13/2025: 10 customers affected, \$19,558.70 lost  
03/13/2025 – 03/17/2025: 9 customers affected, \$36,047.54 lost

**Bank Impersonation Scams**

Fraudsters spoofed our bank's phone number and impersonated employees, including our fraud department and actual staff members, to deceive customers.

**Customer Impersonation Scams**

Fraudsters called pretending to be customers, requesting sensitive account information and attempting to connect with Apple Pay fraudulently.

### **ACH Fraud**

Email and account compromises led to unauthorized ACH transactions totaling \$24,168.00 and \$62,094.11.

### **Check Fraud**

Vulnerable customers were targeted, resulting in \$14,900.00 losses from three fraudulent checks.

### **Debit Card Fraud**

Criminals obtained card numbers and made unauthorized purchases.

These incidents underscore the need for enhanced fraud prevention tools, regulatory flexibility, and improved collaboration across agencies and industry stakeholders. I respectfully urge the agencies to consider the following:

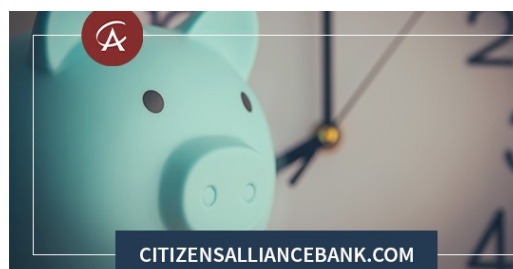
1. Tailored Examiner Expectations: Community banks need examiner guidance that reflects our scale and resources.
2. Improved Data Sharing: Timely and secure sharing of fraud trends and tactics would help us respond proactively.
3. Support for Education Initiatives: Resources to educate consumers and staff on emerging fraud schemes are essential.
4. Technology and Tools: Federal Reserve Bank operator tools should be expanded to help detect and prevent fraud in real time.
5. Collaboration Across Sectors: Encourage partnerships between banks, law enforcement, and technology providers to combat fraud more effectively.

Community banks are on the front lines of protecting customers from fraud. We appreciate your attention to this critical issue and look forward to continued dialogue and action.

Sincerely,  
Angie Kasella  
Senior Vice President / Senior Operations Manager  
Citizens Alliance Bank

**Angie Kasella, CCBCO, CBAP, FLE | Senior Vice President/Senior Operations Manager**

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