

From: [Jennifer C. Weller](#)
To: [Comments](#)
Cc: [Maggie Starkey](#); [Michelle Lindsay](#)
Subject: [EXTERNAL MESSAGE] June 20, 2025-Request for Information On Potential Actions To Address Payments Fraud; Comment Request (RIN 3064-ZA49)
Date: Friday, September 12, 2025 9:33:25 AM
Attachments: [image001.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:

I am the Chief Operations Officer for Citizens Bank, an \$800m Community Bank located in Farmington, NM.

The bank was founded in 1905, and has a 120 year history of taking care of customers financial needs in San Juan County, New Mexico.

When the ICBA Leadership informed us of an opportunity to comment on the amount of fraud and scams we see on a daily basis, we jumped at the chance.

We are also aware that customers may be too embarrassed, ashamed or potentially threatened by the perpetrator if they report a fraud or scam to the bank.

The most common fraud/scams we see are large cash withdrawals, that are taken to local bitcoin ATMs and deposited, stolen checks from mailboxes, homes, and AR check washing/BEC at small businesses.

We also see money mules attempting to open accounts to perpetrate fraud. They open an account with a minimum amount, then begin to deposit large checks and attempt to wire the funds out.

It would be helpful if the UCC could be reviewed (and timeframes extended for fraud) to allow banks the ability to return a fraudulent item after the next business day midnight deadline.

Reg. CC should be reviewed again for the same reason. Banks should have the ability to extend hold times under certain circumstances when check collectability is doubted, and an investigation is underway.

More collaboration between the big banks, regionals, and community banks is necessary.

I believe the only way we will be able to curb fraud is if all regulatory agencies and banks (no matter the size) work together.

It is so sad to see customers taken advantage of by fraudsters and scammers.

Thank you for the opportunity to comment on the RFI.

Sincerely,

Jennifer Weller, COO
Citizens Bank
Farmington, NM

[REDACTED]

[REDACTED]



CONFIDENTIALITY NOTICE: The documents accompanying this document contain confidential information belonging to the sender which may be legally privileged. The information is intended only for the use of the individual or entity named above. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution or the taking of any action in reliance on the contents of this document is strictly prohibited. If you have received this document in error, please immediately notify us by telephone to arrange for return of the original to us.