

**From:** [Kim Kohlbusch](#)  
**To:** [Comments](#)  
**Subject:** [EXTERNAL MESSAGE] June 20, 2025-Request for Information On Potential Actions To Address Payments Fraud; Comment Request (RIN 3064-ZA49)  
**Date:** Monday, August 25, 2025 4:30:24 PM  
**Attachments:** [cblogosmall3\\_e7202016-24e1-4022-8e7f-c3628213436e.png](#)  
[SocialLink\\_Facebook\\_32x32\\_28f47e01-6d5c-40c8-b0ff-bdc973c89a0e.png](#)  
[SocialLink\\_Linkedin\\_32x32\\_e88c7670-6890-4623-858d-984e343891e2.png](#)  
[48-483864\\_equal-housing-lender-logo-fdic-vector-logos.png\\_0e326863-b4cf-460d-8d86-b0e4c889a13c.png](#)  
[1fb85278-e8a5-42d0-98cd-df1a569d3ab8.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 a Senior Vice President and Retail Operations Supervisor at Citizens Bank, a community bank located in Franklin County, Missouri, with an asset size of \$344 Million. I am writing to respond to the Office of the Comptroller of the Currency (OCC)'s Board of Governors of the Federal Reserve System (Board)'s, and Federal Deposit Insurance Corporation (FDIC)'s request for information (RFI) on payments fraud.

Citizens Bank has been serving the Franklin County area since 1934, with a strong presence in New Haven, Gerald, Washington and Pacific Missouri. Citizens Bank takes pride in serving the Greater Franklin County communities, by helping support local economies, and small businesses, by reinvesting deposits locally and providing personalized service. In addition, we offer financial products and services to meet the specific needs of our local client base, and support local communities beyond financial services by placing emphasis on community engagement. We feel community banks play a critical role in educating and protecting our consumers and small businesses from fraud.

I applaud the agencies for issuing this RFI and seeking input on ways the OCC, the Federal Reserve System (FRS), and the FDIC could take actions to help consumer, businesses and financial institution mitigate payments fraud. Community banks continue to be challenged by a rise in fraud and scams across payment types, so agency action is much needed.

Specifically, the Bank has been affected by payment fraud in the following ways:

- Debit Card Fraud – A significant amount of debit card fraud is completed through channels that do not provide for chargeback recoveries from the merchant, thus causing the liability to fall to the bank. While the bank uses many tools to combat debit card fraud, scammers are still gaining access to enough data to complete these transactions, causing banks to have substantial losses, on just one compromised card.
- Identity Theft – Instances of individuals requesting to open new fraudulent business accounts. The new accounts are then attempted to be used to funnel fraudulent checks and wires.
- Check Fraud – a trend that has grown rapidly, from mail fraud to stolen account information used to create fraudulent checks. Failure to locate these items in a timely fashion can lead to large losses for the bank.
- Wire Transfer Fraud – whether it is the receiver or sender of wire transfers, this impacts the bank with additional processes and procedures as well as additional training for staff to recognize and address fraudulent request.

#### Consumer, Business, and Industry Education

Community Banks thrive, in part, because of their close customer relationships. With customer bases including elderly customers, as well as consumers and small businesses, face-to-face engagement is proven to be an effective tool. In-branch materials tailored to these groups would be a valuable resource for community banks. We have a firm belief that consumer

education is one of the most beneficial forms of fraud prevention.

#### Regulation and Supervision

Changes to Regulation CC could help community banks prevent and mitigate check fraud. For example, extended return deadlines for checks related to fraud, and additional clarification for the exception "reasonable cause to doubt collectability". Holds are an essential tool for banks to detect and prevent check fraud. Hold times should not be shortened, as financial institutions should have flexibility to extend hold times under appropriate circumstances.

#### Payments Fraud Data Collection and Information Sharing

Community banks would benefit from automated data collection, analysis, and reporting tools that are integrated with services we already use and do not come with additional costs.

Thank you for the opportunity to provide comments on this RFI. The Bank looks forward to continuing to work with the OCC, FRS, and FDIC, and other stakeholders to protect our customers and communities from the growing threat of payments fraud.

Sincerely,

*Kim Kohlbusch*

Kim Kohlbusch

Senior Vice President/Retail Operations Supervisor

Citizens Bank



Kim Kohlbusch  
Senior Vice President  
Retail Operations Supervisor

Telephone: [REDACTED]

Fax Line: [REDACTED]



\*The information transmitted (including attachments) is covered by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521, is intended only for the person(s) or entity/entities to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient(s) is prohibited. If you have received this e-mail in error, please immediately notify Citizens Bank by telephone at [REDACTED].