

**From:** \_\_\_\_\_  
**To:** \_\_\_\_\_  
**Cc:** \_\_\_\_\_  
**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 12:41:07 PM  
**Attachments:** \_\_\_\_\_

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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 the Deposit Operations Manager at Citizens Bank & Trust, a community bank with just over one billion in assets located in Guntersville, Alabama. Since our founding in 2003, we have proudly served North Alabama with a strong commitment to community and with values rooted in integrity—our core belief is always to *do the right thing*.

I am writing in response to the Office of the Comptroller of the Currency, the Board of Governors of the Federal Reserve System, and the Federal Deposit Insurance Corporation's request for information on payments fraud.

Fraud across ACH, wire, check, and instant payments remains one of the most significant risks facing both our institution and the communities we serve. I would like to share the challenges we encounter and the support we believe is necessary to protect our customers. As a small community bank, we increasingly struggle to resolve check fraud claims with larger financial institutions where they are often the bank of first deposit. Too often, their lack of timely responses leaves us and our customers vulnerable. It would be helpful to enforce accountability and prioritize oversight on these banks-requiring them to address, report, and take fraud inquiries from smaller institution seriously, with penalties for failing to do so. Right now, it is simply too easy for them to "wait us out", while community banks absorb the cost

and frustration. One critical gap is the lack of a centralized, industry-wide platform for reporting fraud, scams, and suspicious activity. Without such a resource, each bank must independently detect perpetrators—allowing fraudsters to simply move from one institution to another. This cycle severely undermines our ability to stop fraudulent activity effectively.

Regulatory adjustments could help. In particular, extending the Reg CC return deadline related to fraud, and expanding the “reasonable cause to doubt collectability” exception to explicitly include fraud and alterations, would provide community banks with needed flexibility to respond more effectively.

Recently, I began certification as a Human Crimes Specialist, where the focus is on identifying financial transactions linked to human exploitation. This experience reinforced for me how urgent it is to strengthen our fraud detection tools and how critical regulatory support is in combating both fraud and broader criminal activity. Community banks play a vital role in safeguarding consumers and local businesses, and meaningful regulatory action must reflect the realities we face daily—whether that means improved fraud-detection resources or greater collaboration across financial institutions and agencies.

Thank you for considering these concerns. I urge regulators to take action that empowers community banks like ours to continue protecting the customers and communities we are privileged to serve.



**Rena Tidmore**

*VP | Deposit Operations Manager*



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