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From: Justin Van Zuiden <[REDACTED]>
Sent: Friday, August 29, 2025 7:52 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:

My name is Justin Van Zuiden and I am the Special Assets Officer at Community First Bank of Indiana, an ~\$800 million asset community bank located in Kokomo Indiana. I am writing to respond to the request for information on payments fraud.

Until recently I ran the bank's fraud department. Our bank prides itself on customer service in all aspects of the community. Whether it be giving back to Veteran's by volunteering throughout the communities we serve on Veteran's Day in acts of service to Veteran's, community shred days, or generous work through various non-profits – it is a defining piece of our culture.

I am excited that the agencies are seeking input on ways that they could take actions to help consumers, businesses, and financial institutions mitigate fraud. Consumers continue to be plagued by fraud and scams, so we are thankful for these agencies call to action.

Our customers have been affected by fraud in any number of ways:

• Wire Fraud	• Romance Scams
• Check Fraud	• Work from home schemes
• Phishing scams	• Fake Merchants
• Law enforcement scams	• Tech scams

You name it, we've seen it.

Consumer, Business, and Industry Education

Starting last year, I began efforts to further educate the community on fraud as we were tired of playing defense. I began hosting seminars at local non-profits, local community groups, assisted living facilities, and even the local library to better arm the community in the fight against fraud. These are ongoing with

my successor carrying the message far and wide. In our eyes, EVERYONE is a part of our community when it comes to fraud – not just our customer base, and we try to get in front of anyone who will listen. It would be of tremendous help if the various governing agencies creating templates, guides, dos and don'ts, helped communities connect and put on fraud seminars to spread the word. I firmly believe utilizing various platforms (YouTube, Twitch, X, Instagram, FaceBook) and influencers who genuinely care about others would be an easy way to help get the word out. Additionally, the publications available from the FTC has been very popular amongst our community – though many banks I've worked with didn't know they existed.

External Collaboration

- We support collaborative efforts in the fight against fraud. Fraud and scams persist across state borders, which is why we created a group known as the Fraud Fighters Coalition. This group is home to over 30 FIs, from coast to coast, of all shapes and sizes. Creating spaces where tips on fraud, education, and open dialogue in regard to best practices is crucial in the national crisis we are facing.
- Resources that assist in connecting law enforcement of all levels with banks of all sizes would be an invaluable asset. I have talked to many FIs who have struggled in building relationships with law enforcement that simply don't know where to start.

Regulation and Supervision

- Fraud regulations and examiner expectations need to be tailored to community banks with tiered compliance requirements and deadlines. There are opportunities to enhance guidance around appropriate controls, technology, reporting, and incident response, but it is important to avoid imposing new burdens on community banks.
- Fraud remains a consistent issue in regard to attempting to work with larger FIs not timely cooperating, or sometimes flat out not responding. I am concerned that some large FIs are not exercising sufficient CIP/KYC processes and opening accounts that are being leveraged by fraudsters. More often than not these institutions are defaulting to 60 days before even issuing a response, again, if one is received at all. This is simply too long and as you know, time is of the essence in the fraud world.
- Changes to Reg CC could help community banks prevent check fraud. An example, the return deadline related to fraud could be extended by an additional day, the "reasonable cause to doubt collectability" exception could be further clarified, and relevant definitions could be revised (e.g., "altered" and "alteration"). Hold times should not be shortened; they are an essential tool for banks to detect and prevent check fraud. FIs should have flexibility to extend hold times under appropriate circumstances, again with further clarification.

Payments Fraud Data Collection and Information Sharing

- Centralized data reporting would be invaluable for the ecosystem, however, we should avoid imposing additional data collection requirements on community banks. Appropriate safe harbors would improve banks' ability and willingness to share fraud data. We also find that some FIs that are a part of the 314b program simply only use it when it benefits them and will often never respond, hindering investigations.
- Data collection, analysis, and reporting tools that are integrated with services we already use and do not come with additional costs would be a tremendous asset.

Thank you for the opportunity and time you've spent reading comments from banks all over just like ours. We are looking forward to helping pave the wave to a fraud free future – working hand in hand with regulatory agencies and our peers to end fraud.



Justin Van Zuiden, CAFP
Special Assets Officer, AVP

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Member FDIC



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