

From: [Tina Cline, CRCM CCBIA](#)
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, September 15, 2025 12:23:59 PM
Attachments: [image537460.png](#)
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[image727165.png](#)
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[image996028.png](#)
[image297778.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:

Thank you for the opportunity to provide input on payments fraud. As a community bank, First Century Bank continues to face increasing threats across check, ACH, wire, and instant payment channels. These incidents impact our customers and strain our resources.

As fraud continues to evolve, it is critical that we remain vigilant and proactive in identifying and mitigating emerging threats. Below is a summary of key fraud trends currently impacting the banking industry:

- AI-Driven Fraud

Fraudsters are leveraging generative AI tools to create highly convincing phishing emails, voice impersonations, and deepfake videos. These tactics are increasingly difficult to detect and pose risks to customer security and institutional integrity.

- First-Party Fraud

This type of fraud involves legitimate customers misrepresenting themselves, such as filing false claims or disputing legitimate transactions. It is growing rapidly and often bypasses traditional fraud detection systems.

- **Synthetic Identity Fraud**

Criminals are combining real and fabricated personal data to create synthetic identities. These identities are used to open accounts and access credit, often going undetected until significant losses occur.

- **Account Takeovers (ATO)**

Cybercriminals are using stolen credentials to gain unauthorized access to customer accounts. These takeovers often result in fraudulent transactions and reputational damage.

- **Resurgence of Check Fraud**

Despite the shift to digital banking, check fraud is resurging, particularly in community banks. Fraudsters are exploiting weaknesses in check processing and remote deposit capture systems.

- **Mobile and Cloud-Based Scams**

As mobile banking and cloud communications expand, fraudsters are targeting these platforms with toll fraud, app-based scams, and social engineering attacks.

Tina Cline, CRCM CCBIA

EVP/Chief Compliance & CRA Officer/Audit Manager

First Century Bank



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