

From: [Haynes Standard](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] June 20, 2025-Request for Information On Potential Actions To Address Payments Fraud; Comment Request (RIN 3064-ZA49)
Date: Wednesday, September 10, 2025 8:06:33 AM

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 commenting on the Regulatory request to address Payments Fraud and how it affects my Bank: First State Bank, Wrens, GA. We continue to deal with a great deal of fraud in our normal business activities. We have had several instances of wire fraud, some ACH fraud, and more check fraud. We are appreciative of regulatory efforts to combat the continuing struggle to stop fraud and fraudulent actors. Collaboration between more parties would benefit everyone. Our biggest challenge, particularly on check fraud, is the loose review of mobile check deposits, especially by the larger, regional and national banks and credit unions. 80 to 90% or more of the fraudulent checks that we receive clear at one of those banks and almost all are deposited via mobile check deposits. This is particularly egregious in situations where the check is not washed but simply endorsed over illegally to another individual. We have had instances where a company's endorsement was paid over to a person including some checks that were payable to Public Entities. We humbly request that as part of your consideration on check and other types of payment fraud, that the larger banks provide more review of endorsements and the checks themselves to help combat payment fraud. They have engaged systems that help to catch wire and electronic fraud but can not and do not follow the general commercial code rules to check and verify endorsements. Also they are typically very difficult to work with when smaller banks attempt to contact fraud or security departments to obtain funds back for our customers who have been defrauded. Thank you for giving us this opportunity to comment.

Sincerely

Haynes Standard, Jr.

CFO/EVP

First State Bank

Main Office Number - [REDACTED]

Direct Line - [REDACTED]

Fax - [REDACTED]

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