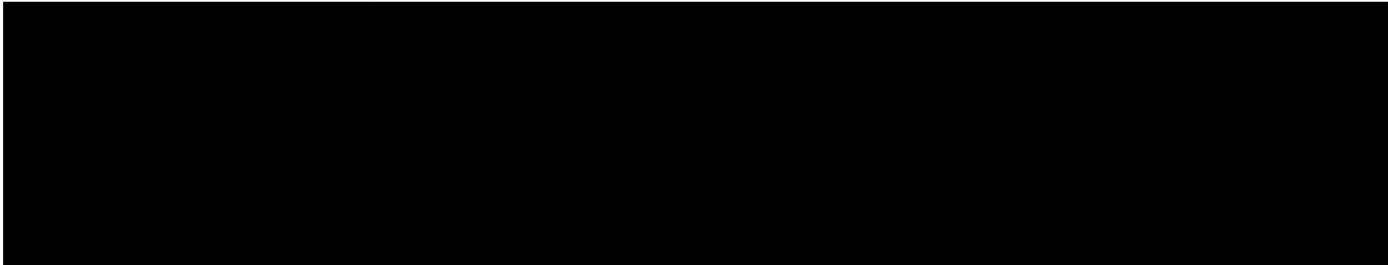


**From:** [Harms, Shaun](#)  
**To:** [Comments](#)  
**Subject:** [EXTERNAL MESSAGE] June 20, 2025-Request for Information On Potential Actions To Address Payments Fraud; Comment Request (RIN 3064-ZA49)  
**Date:** Thursday, September 18, 2025 9:19:51 PM  
**Attachments:** [image001.png](#)



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'd like to share my perspective on the growing fraud issues affecting our industry. The scale of fraud today is not only damaging to financial institutions but—more critically—harming consumers. When fraudsters target consumers, everyone loses.

Consumers often authorize these transactions unknowingly, leaving banks with limited recourse and no liability. As a result, consumers bear the financial loss and frequently blame the banks. I work with hundreds of banks across the country, and the prevalence of scams (whether through check fraud, ACH manipulation, or debit card abuse) is widespread. Banks urgently need support in identifying and detecting fraud as part of broader consumer protection efforts. Meanwhile, social media platforms and telecom providers continue to enable spam calls and fraudulent texts, yet face no accountability. This loophole must be addressed. While consumer education is often cited as a solution, banks consistently attempt to inform customers, with little success. Education alone is not enough. We need a more comprehensive strategy to reduce consumer financial losses. The solution must extend beyond the financial sector.

I personally met with several federal agencies in Washington, D.C. this week to discuss this issue. Fraud has reached an unsustainable level, and banks should not be held solely responsible.

Thanks for your efforts in this matter.

**Shaun Harms – CRCM, CAFP**  
Principal / Consulting - Regulatory Compliance

