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**From:** Denise Daley-Rix <[REDACTED]>  
**Sent:** Thursday, August 28, 2025 1:34 PM  
**To:** Comments  
**Subject:** [EXTERNAL MESSAGE] June 20, 2025-Request for Information On Potential Actions To Address Payments Fraud; Comment Request (RIN 3064-ZA49)

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 Compliance Officer of Glenwood State Bank, a \$315 million community bank located in Glenwood, Iowa. I am writing to respond to the Office of the Comptroller of the Currency (OCC)'s, Board of Governors of the Federal Reserve System (Board)'s, and Federal Deposit Insurance Corporation (FDIC)'s request for information (RFI) on payments fraud.

Glenwood State Bank is a family-owned community bank established in 1899. We have proudly served our Southwest Iowa communities for over 125 years; through the Great Depression, the farm crisis, the S&L debacle, the 2008 mortgage collapse and now we are facing unprecedented challenges related to payment fraud.

Specifically, the Bank and our customers have been affected by payment fraud in the following ways:

- Wire Fraud resulting from scams including romance, government impersonation, investment and similar culminating in losses over \$250,000.00
- Check Fraud resulting from employment scams, check washing and fraudulent checks resulting in losses over \$50,000.00
- Crypto Currency scams, utilizing Crypto ATMs, resulting in losses over \$50,000.00

Community Banks serve elderly customers, as well as consumers and small businesses in rural and agricultural areas, so education materials tailored to these groups that are available in multiple formats

such as in-branch and digital messaging would be valuable. The bank currently provides some of this educational information to our customers and general public, but additional education is warranted.

Additionally, the Bank supports collaborative efforts to address payments fraud including data collection and information sharing integrated into services they already use and do not come with additional costs. Appropriate safe harbor protections would improve banks' ability and willingness to share fraud data.

Thank you for the opportunity to provide comments on this RFI. The Bank looks forward to continuing to work with the OCC, FRS, and FDIC, and other stakeholders to protect our customers and communities from the growing threat of payments fraud.

Sincerely,

Denise Daley-Rix  
Compliance Officer  
Glenwood State Bank

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