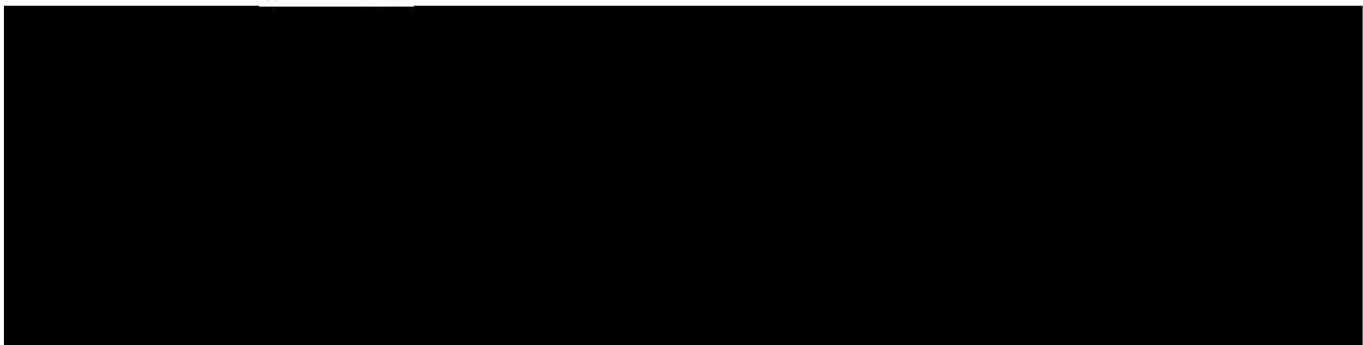


From: [Lisa Hughes](#)
To: [Comments](#)
Subject: [EXTERNAL MESSAGE] June 20, 2025-Request for Information On Potential Actions To Address Payments Fraud; Comment Request (RIN 3064-ZA49)
Date: Thursday, September 18, 2025 7:11:04 PM
Attachments: [image001.png](#)



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 am the CFO and SVP of Heritage Bank of St. Tammany, a very small community bank with \$187 million in assets. 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.

I have been in banking 44 years now and I thank you for taking the time to read my input.

My suggestion is specific to wire transfer fraud initiated online and is based on personal experience.

Timing is everything. Yesterday, my elderly mother received an email stating there was an Apple charge, and if it was not correct, call this number. And she did. And she followed their instructions putting software on her computer to let them have access, and after she logged in to her CHASE account, **proceeded to initiate a wire transfer for \$20,000**. She finally realized and shut them down and froze her account until she could open a new account and take all the steps to protect herself. **But** she was in this same situation a year ago. As seniors go, she is still in pretty good shape mentally, but she is a bit gullible and a little forgetful. That's the same reason seniors are targeted so frequently – they get caught off guard and they are more likely to believe these people. We've had some 'doozies' here at our bank with our senior customers as well. The truth is this type of fraud happens all the time.

Wouldn't it be great if banks offered trimmed down options or permissions in online banking for seniors or others if they wanted it? I called CHASE and asked if they could turn off the wire transfer option in my mother's online account. The answer was no, it's part of the application. "Can you code this account to never allow wire transfers?" No. At a small institution like mine, we are more flexible, but at most banks, they are not.

I would love to see as a part of your initiative to mitigate fraud to encourage banks to offer **optional** safeguards in online banking for their customers that have no need for access to wire transfers or external transfers. That would eliminate one part of the fraud equation affecting our customers.

Sincerely,

Lisa B Hughes

Sr. Vice President - Chief Financial Officer

