

**From:** [Leonard Thomas](#)  
**To:** [Comments](#)  
**Subject:** [EXTERNAL MESSAGE] June 20th, 2025 - June 20, 2025 - Request for Information on Potential Actions To Address Payments Fraud; Comment Request (RIN 3064-ZA49)  
**Date:** Friday, June 27, 2025 9:33:31 AM  
**Attachments:** [REDACTED]

[REDACTED]

Where we have seen the most fraud, as a community bank, is from much larger institutions allowing known or unknown customers to open accounts online and then submit deposits without review from the originating bank, usually by remote deposit capture. The bank of first deposit has been an issue of loss and fraud for many community banks. If we were to hold these banks of first deposit more accountable for the losses, I believe we would cut down on a lot of the fraudulent activity.

Thanks,

Leonard Thomas



**Leonard Thomas**  
Executive Vice President  
Chief Financial Officer

[REDACTED]  
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