

Update: Nationwide Zoning and Planning Scam Targeting SLTT Residents and Businesses

July 2026 • OCAR-2026-6

TLP:GREEN

Executive Summary

The Federal Bureau of Investigation (FBI) and the Center for Internet Security (CIS) Cyber Threat Intelligence (CTI) team are publishing this product to provide updates to State, Local, Tribal, and Territorial government entities (SLTTs) about a scam in which threat actors masquerade as local and county planning and zoning departments to extract illegitimate land use application renewal payments from local businesses and residents. CIS CTI first reported this scam in the December 2025 advisory OCAR-2025-8 titled, “Nationwide Zoning and Planning Scam Targeting SLTT Residents.” In March 2026, the FBI released Public Service Announcement I-030926-PSA titled, “Criminals Impersonating City and County Officials in Phishing Emails for Planning and Zoning Permits.”

Since this report, the FBI and CIS CTI have continued to observe widespread examples of this activity across the United States, including variations featuring several new shifts in tactics. Many SLTT entities have independently released advisories on this activity. Readers can identify these advisories by running a simple search engine query for “scam zoning and planning email.” SLTTs should consider disseminating messaging about this activity to their constituents and the companies with whom they have business, noting their official government email domains for correspondence.

Email Formatting

In the previous December 2025 report, CIS CTI highlighted the following email syntax that was present across scam efforts: `planning.[SLTT-Identifier]@usa.com`. Since December 2025, the FBI also has continued to observe this email syntax, as well as several variations provided in Appendix A.

As first reported in the December 2025 advisory, these emails continue to leverage the Mail.com service, which is a web-based flexible email provider that enables users to register customized email addresses using domains such as `usa[.]com` with little verification. While the specific wording in the email body varies slightly across examples, much of the lure’s overall narrative remains the same (see Appendices B and C for redacted examples of the some of these emails observed in February and March 2026).

Fraudulent Invoice Attachments

As detailed in the December 2025 report, the malicious emails have included fraudulent invoice attachments tailored to appear as if they originated from the SLTT entities the actors are impersonating (Figure 1 for examples of those invoices). Metadata analysis of the fraudulent invoices from both 2025 and 2026 suggests that the actors may create some of these PDF invoices using Google Docs. The metadata in some of the observed examples listed the Skia/PDF Google Docs Renderer as the PDF generators.

Examples of these invoices have contained some legitimate information, sourced from publicly available SLTT data, to legitimize the attempts. In April 2025, an SLTT entity reported that threat actors may have sourced information used for a fraudulent invoice from that SLTT entity's publicly available portal, referred to as Civic Access or Citizen Self Service portal. These platforms are used to apply, manage, and pay for development permits, plans, and business licenses.

Note that the specific invoice attachment appears to vary across samples, but the below example captures the intended lure and wording observed. Identifying text and SLTT entity seals have been redacted. The invoice also had a large and slightly opaque SLTT logo in the background of the invoice, which has been removed to protect the impersonated entity's identity:

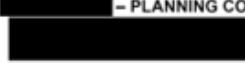
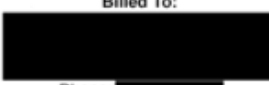
 CITY OF [REDACTED] – PLANNING COMMISSION 		<table> <tr> <td>Zoning & Compliance Assessment</td> <td>\$700.00</td> </tr> <tr> <td>Legal & Administration Fees</td> <td>\$600.00</td> </tr> <tr> <td>Public Notification & Documentation</td> <td>\$700.00</td> </tr> <tr> <td>Total Amount Due</td> <td>\$4,800.00</td> </tr> </table>	Zoning & Compliance Assessment	\$700.00	Legal & Administration Fees	\$600.00	Public Notification & Documentation	\$700.00	Total Amount Due	\$4,800.00
Zoning & Compliance Assessment	\$700.00									
Legal & Administration Fees	\$600.00									
Public Notification & Documentation	\$700.00									
Total Amount Due	\$4,800.00									
INVOICE Invoice Number: [REDACTED] Invoice Date: February 3, 2026 Due Date: Due Upon Receipt Billed To:  Phone: [REDACTED] Email: [REDACTED]		Purpose of Fees: This invoice represents fees associated with the review, processing, and approval of the Full Civil & Landscape Plan submittal for the proposed new daycare facility. These fees support: • Administrative management and record keeping of applications • Comprehensive technical and regulatory review of plans • Site inspections and verification of compliance • Public hearings and community notifications • Maintenance of technological platforms for submissions and tracking • Compensation for infrastructure impacted by new development								
Invoice Description & Breakdown <table> <thead> <tr> <th>Description</th> <th>Amount (USD)</th> </tr> </thead> <tbody> <tr> <td>Application Review & Processing Fee</td> <td>\$2,800.00</td> </tr> </tbody> </table>		Description	Amount (USD)	Application Review & Processing Fee	\$2,800.00	Remittance Instructions Wire Transfer Instructions: Provided upon request. Important: A signed copy of this invoice must be returned along with your wire payment receipt to this email for confirmation.				
Description	Amount (USD)									
Application Review & Processing Fee	\$2,800.00									
		Payment Terms: • Payment is due upon receipt. • All correspondence regarding this case must be conducted via email only to ensure proper documentation and inclusion on relevant agendas.								
Notes: • Staff have recommended approval of your application. Settlement of this invoice will streamline the remainder of the approval process. • Failure to remit payment may result in delays to application review and approval.										
ISSUED BY: CITY OF [REDACTED] – PLANNING COMMISSION  										

Figure 1: Redacted fake invoice example

MITRE ATT&CK Patterns Observed

Resource Development

T1585 - Establish Accounts

Initial Access

T1566.001 - Phishing: Spearphishing Attachment

Impact

T1657 - Financial Theft

Recommendations

The FBI and MS-ISAC recommend SLTT entities disseminate information about this activity to their constituents, specifically noting the official government email domains used for business correspondence. The FBI and CIS CTI recommend SLTT agencies prioritize disseminating this information to businesses and residents currently undergoing land use renewal applications. The following are specific items to highlight:

- A common red flag of this scheme and related schemes is urging victims via email to issue payment;
- Malicious email requests originate from the email domain usa[.]com—provided by the service Mail.com—and not from legitimate SLTT agency domains;
- Malicious emails may arrive shortly before or concurrent to the time of hearings, in order to add legitimacy to the lure;
- Malicious emails and attached invoices often include some legitimate information, which the actors may source from publicly available documents on Citizen Access or Citizen Self Service portals

Response

The FBI and CIS CTI request victims and notified SLTTs report incidents to local law enforcement, including their local FBI Field Office or the FBI's Internet Crimes Complaint Center (IC3) at www.ic3.gov. SLTT entities can report incidents to the local FBI Field Office, IC3, and the MS-ISAC at soc@cisecurity.org or 866-787-4722.

Appendix A: Full List of Observed Email Syntax

In the previous December 2025 report, CIS CTI highlighted the following email syntax that was present in all attempts: `planning.[SLTT-Identifier]@usa.com`. Since December 2025, the FBI also has continued to observe this email syntax, as well as variations wherein the SLTT identifier is the associated county or municipality name. Both variations are included below:

Sender name	Sending domain
[SLTT-Identifier].boardofzoningappeas.gov	@usa.com
[SLTT-Identifier].plancommission.gov	@usa.com
[SLTT-Identifier].planning	@usa.com
[SLTT-Identifier].planningcommission.gov	@usa.com
[SLTT-Identifier]areaplancommissionboard.gov	@usa.com
[SLTT-Identifier]-gov	@usa.com
cityclerk.[SLTT-Identifier].[SLTT-Identifier].org	@usa.com
county.[SLTT-Identifier]planning	@usa.com
dept.[SLTT-Identifier]	@usa.com
pc.[SLTT-Identifier]	@usa.com
planning.[SLTT-Identifier]	@usa.com
planning.[SLTT-Identifier]-org	@usa.com
planning.dept.[SLTT-Identifier]	@usa.com
planning.zoning.[SLTT-Identifier].gov	@usa.com
planning[SLTT-Identifier]	@usa.com
planning-[SLTT-Identifier].org	@usa.com
planning_[SLTT-Identifier]	@usa.com
planning_[SLTT-Identifier]commission	@usa.com
planning_dept.[SLTT-Identifier]	@usa.com
planningboard.[SLTT-Identifier].gov	@usa.com
planningco.[SLTT-Identifier]	@usa.com
planningcom_[SLTT-Identifier]	@usa.com
planningcommission.[SLTT-Identifier].gov	@usa.com
planningdepartment[SLTT-Identifier]	@usa.com
planning-dept.[SLTT-Identifier]	@usa.com
planning-dpt.[SLTT-Identifier]	@usa.com

Appendix B: Email Format Example 1 – Observed in February 2026

Note that the specific email content appears to vary across samples, but the below example captures the intended lure and wording observed:

From: PlanningCo.[SLTT-Identifier]@usa.com

Date: [Redacted]

Subject: Invoice Settlement Required for Daycare Application Review and Approval

To: [Business]

[SLTT-Identifier] - PLANNING COMMISSION

[SLTT-Address]

Dear [Business],

We hope this message finds you well. This email is regarding your application for the **Full Civil & Landscape Plan submittal for the proposed new daycare facility**. We are pleased to inform you that **staff have reviewed your application and recommended it for approval**. To streamline the remainder of the approval process and ensure timely processing, it is necessary to settle the attached invoice, which covers the **application review and approval fee** associated with your submission.

This fee plays a critical role in facilitating an organized and efficient application process. Its importance includes, but is not limited to, the following:

- **Application Management:** Ensures proper tracking and management of all submitted materials, allowing staff to maintain accurate records for auditing and compliance purposes.
- **Comprehensive Review:** Supports thorough technical and administrative review of your civil and landscape plans, guaranteeing all regulatory and safety standards are evaluated.
- **Approval Process Facilitation:** Helps streamline internal workflows, enabling faster coordination between departments and moving your application toward approval without unnecessary delays.
- **Site Visits:** Covers the cost of on-site inspections and assessments by qualified staff to verify compliance with submitted plans and applicable codes.
- **Public Hearings:** Funds logistical support and coordination for any public hearings that may be required as part of the application review, including notifications and record-keeping.
- **Technological Maintenance:** Supports software systems and online platforms used for document submission, plan review, and internal tracking to maintain operational efficiency.
- **Infrastructural Compensation:** Contributes to the upkeep and enhancement of infrastructure necessary for safely supporting new developments in the community, including stormwater management, roadways, and utilities impacted by the proposed project.

To proceed efficiently with your application, we request the following next steps:

1. **Reply to this email** to request wire transfer instructions for the invoice payment.
2. **Settle the invoice** using the provided wire transfer instructions.
3. **Return the payment receipt** to this email address for confirmation and official documentation.

Please note that **all correspondence associated with this case must be conducted via email**. This ensures proper documentation for auditing purposes and allows us to include relevant updates on upcoming agendas and internal reviews.

We appreciate your timely attention to this matter. Settling this invoice promptly will help us maintain momentum on your application, enabling the final approval process to proceed without delay. Should you have any questions regarding the invoice or the payment process, please do not hesitate to reach out.

Thank you for your cooperation and commitment to completing all necessary steps for your new daycare project. We look forward to finalizing the approval and supporting your project's successful development.

Sincerely,

[SLTT-Identifier] - PLANNING COMMISSION

[SLTT-Address]

Appendix C: Email Format Example 2 – Observed in March 2026

Note that the specific email content appears to vary across samples, but the below example captures the intended lure and wording observed:

From: dept.[SLTT-identifier]_commission@usa.com>
Sent: [REDACTED]
To: [Business Owner]
Subject: Request for Settlement of Application Review and Approval Fee – [Business Name] COB Application

[SLTT-Identifier] Planning Commission

[SLTT-Address]

Dear [Business Owner],

We hope this message finds you well.

This email is in reference to your submitted application concerning **[Business Name] – Change of Ownership (COB), Restaurant to Restaurant**. Following a comprehensive internal review, we are pleased to inform you that staff have **recommended approval** of your application, subject to the completion of all administrative requirements.

As part of the standard regulatory and administrative process, an **Application Review and Approval Fee** has been assessed. This fee is reflected in the attached invoice and must be settled promptly in order to **finalize and streamline the approval process**. Please note that processing cannot proceed to final authorization without confirmation of payment.

For transparency, the Application Review and Approval Fee supports several critical functions associated with your application, including:

- **Application Management:** Coordination, intake processing, and administrative handling of your submission from receipt through final determination.
- **Technical Review:** Detailed evaluation conducted by qualified staff to ensure compliance with applicable health, safety, zoning, and operational standards.
- **Approval Processing:** Preparation of official documentation, internal approvals, and certification required for lawful ownership transition.
- **Site Visits and Inspections:** Scheduling and execution of any necessary on-site assessments to verify operational readiness and regulatory compliance.
- **Public Hearings (if applicable):** Administrative support, documentation, and facilitation of any required public review or hearing processes.
- **Technological Maintenance:** Utilization and upkeep of secure digital systems used for application tracking, document storage, and communication.
- **Infrastructure and Administrative Support:** Compensation for personnel, facilities, and systems required to ensure efficient and compliant processing of your application.

Given that your application has already progressed to the recommendation stage, **timely settlement of this invoice is essential** to avoid delays and to ensure your approval is issued without interruption.

Next Steps

To proceed, please follow the steps outlined below:

1. **Reply to this email** to formally request the wire transfer instructions for invoice payment.
2. Upon receipt, **complete the wire transfer** in accordance with the provided instructions.
3. **Return a copy of the payment receipt** via reply to this email for confirmation and reconciliation.

Please be advised that **all correspondence related to this case must be conducted via email**. This ensures proper documentation, facilitates audit compliance, and allows for efficient inclusion in administrative records and agenda tracking.

We appreciate your prompt attention to this matter and your cooperation in completing the final steps of the approval process. Should you have any questions or require clarification, please do not hesitate to respond directly to this email.

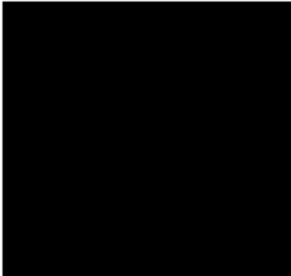
Sincerely,

[SLTT-Identifier] Planning Commission

[SLTT-Address]

Appendix D: Additional Invoice Attachment Example – Observed in March 2026

Note that the specific invoice attachment appears to vary across samples, but the below example captures the intended lure and wording observed. Identifying text and SLTT entity seals have been redacted. The invoice also had a large and slightly opaque SLTT entity seal in the background of the invoice, which has been removed to protect identity:




OFFICIAL INVOICE

Invoice Number: 
Issue Date: March 19, 2026
Payment Terms: Due Upon Receipt

BILL TO

 parcel number
()
Phone: 
Email: 

DESCRIPTION OF SERVICES

Application Review & Processing Fee — \$2,000.00
Zoning & Compliance Assessment — \$950.00
Legal & Administrative Fees — \$600.00
Public Notification & Documentation — \$400.00

TOTAL AMOUNT DUE: \$3,950.00

PAYMENT INSTRUCTIONS
Payment may be made via wire transfer

Wire transfer instructions will be provided upon request.
Please reference Invoice #  with your payment.

CONTACT INFORMATION
For questions regarding this invoice, Please reply directly to this
correspondence
Email inquiries may be directed to this correspondence for record
purposes.

 Planning Commission


Thank you for your prompt attention to this payment.



Multi-State Information Sharing and Analysis Center (MS-ISAC)
1712 Rt 9 Suite 102
Clifton Park, NY 12065
SOC@cisecurity.org - 1-866-787-4722

**TLP:GREEN**

Sources may use **TLP:GREEN** when information is useful for the awareness within their wider community.

Recipients may share **TLP:GREEN** information with peers and partner organizations within their sector or community but not via publicly accessible channels. Information in this category can be circulated widely within a particular community. **TLP:GREEN** information may not be released outside of the community. If the community is not specified, assume the cybersecurity/defense community.

<https://www.cisa.gov/tlp>