

**From:** [Jamie M. Bunton Jr.](#)  
**To:** [Comments](#)  
**Subject:** [EXTERNAL MESSAGE] June 20, 2025-Request for Information On Potential Actions To Address Payments Fraud; Comment Request (RIN 3064-ZA49)  
**Date:** Friday, August 22, 2025 1:41:33 PM  
**Attachments:** [image.png](#)

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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 EVP of Bank of the Lowcountry, a \$370 Million community bank located in Walterboro, SC. 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.

We are a small bank in the lowcountry of South Carolina serving the Charleston, Colleton, Jasper, Hampton, and Beaufort area. We have been helping out our small communities since May of 1989 with 6 branch locations currently. We are usually the only outlet most customers and small businesses have to financial assistance. For instance, during the PPP loans, the bigger financial institutions would not handle loan requests for monies under \$25,000 and we had several clients from around the state that came to us because we did not discriminate on the monetary request during the PPP loans. Some clients only qualified for \$1,000, but we treated them the same as those who qualified for much larger amounts.

I applaud the agencies for issuing this RFI and seeking input on ways that the OCC, the Federal Reserve System (FRS), and the FDIC could take actions to help consumers, businesses, and financial institutions mitigate payments fraud. Community banks continue to be challenged by a rise in fraud and scams across payment types, so agency

action is much needed.

Specifically, the Bank has been affected by payments fraud in the following ways:

- Paypal Scams
- Car Wrap scams for less than \$4,000 that only allow a two day hold, and the checks coming back fraudulent on the 4<sup>th</sup> day.
- Customer checks being stolen at local post offices, and then checks being altered and represented causing small local businesses to have to fight the loss out in court.

James M Bunton, EVP  
Customer Service Representative  
Bank of the Lowcountry

[REDACTED]

NMLS# 430709

[REDACTED]



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