

## COMMUNITY REINVESTMENT ACT

### CRA Written Public Comment Sheet

#### Comments Received:

2025 - None

2024 - None

2023 - None

## COMMUNITY REINVESTMENT ACT

### CRA Written Public Comment - 2022

August 2, 2022

Karin Bearss  
Vice President  
Federal Reserve Bank of Minneapolis  
90 Hennepin Ave,  
Minneapolis, MN 55401

Re: Complaint Filed by [REDACTED]

Dear Karin Bearss:

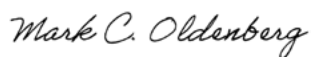
In response to Security Financial Bank redlining: Redlining is a term used for an illegal practice where people living in a certain area or neighborhood are not given the same access to credit as people in other areas or neighborhoods on the basis of race, color, or for some other prohibited reason. The location of the property is within Security Financial Bank's marketable area. The location of the property was not a contributing factor to the denial of the request. Furthermore, as indicated by [REDACTED], Security Financial Bank recently approved and originated a lot loan for the property in question.

Security Financial Bank requires a minimum down payment of 10% for construction loans. However, there are additional requirements that must be met to qualify for a loan. During the underwriting process for the construction loan in question; it was determined that the income did not support the loan amount requested by the applicants and a counteroffer was issued. The applicants elected not to accept the counteroffer.

Regarding the processing time lines for this request: Security Financial Bank made a policy exception to allow the customer to act as their own general contractor for the construction of their home. The customer completed training to obtain a general contracting license. Although Security Financial Bank made the exception to allow for the customer to act as their own general contractor, Security Financial Bank did not waive the required documentation for construction loans. Detailed cost breakdown, valid bids and estimates are all required for construction loan approval. An appraisal will not be ordered by Security Financial Bank until all bids and estimates are received. This is required as the appraiser relies on this information to provide an accurate appraisal report.

In summary, Security Financial Bank did not engage in redlining and followed its normal underwriting practices to decision this loan request.

Sincerely,



Mark C. Oldenberg  
President / CEO  
[moldenberg@sfbank.com](mailto:moldenberg@sfbank.com)  
715.930.7037

## COMMUNITY REINVESTMENT ACT

### CRA Written Public Comment - 2022

August 1, 2022

Mr. Mark Oldenberg  
President/CEO  
Security Financial Bank  
212 West Prospect Street  
Durand, WI 54736

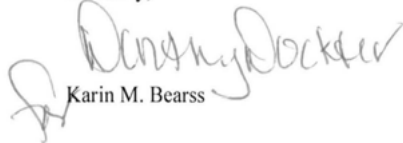
Re: Complaint Filed by [REDACTED]

Dear Mr. Oldenberg:

We received an electronic complaint dated July 26, 2022, against your bank (copy attached). The Federal Deposit Insurance Corporation originally received the complaint. We are requesting that the bank respond by August 15, 2022, to each issue outlined in [REDACTED]' complaint. The bank's response should also include copies of all pertinent documentation. In addition, please send me a copy of any correspondence directed to [REDACTED], which is intended to resolve this matter.

Thank you for your cooperation. If you have any questions, please contact Dorothy Dockter at (800) 553-9656 or directly at (612) 204-5126.

Sincerely,

  
Karin M. Bearss

KMB/KCW  
Enclosure

**THIS DOCUMENT IS STRICTLY CONFIDENTIAL**

This document has been prepared by an examiner selected or approved by the Board of Governors of the Federal Reserve System. The document is the property of the Board of Governors and is furnished to directors and management for their confidential use. The document is strictly privileged and confidential under applicable law, and the Board of Governors has forbidden its disclosure in any manner without its permission, except in limited circumstances specified in the law (12 U.S.C. 1817(a) and 1831m) and in the regulations of the Board of Governors (12 C.F.R. 261.20). Under no circumstances should the directors, officers, employees, trustees or independent auditors disclose or make public this document or any portion thereof except in accordance with applicable law and the regulations of the Board of Governors. Any unauthorized disclosure of the document may subject the person or persons disclosing or receiving such information to the penalties of Section 641 of the U.S. Criminal Code (18 U.S.C. 641). Each director or trustee, in keeping with his or her responsibilities, should become fully informed regarding the contents of this document. In making this review, it should be noted that this document is not an audit, and should not be considered as such.

[karin.bearss@mpls.frb.org](mailto:karin.bearss@mpls.frb.org) 612.204.5091 Fax 612.204.5114 1.800.553.9656

90 HENNEPIN AVENUE, MINNEAPOLIS, MINNESOTA 55401 | [minneapolisfed.org](http://minneapolisfed.org)

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## COMMUNITY REINVESTMENT ACT

### CRA Written Public Comment - 2022

**From:** [FDIC NoReply](#)  
**To:** [SYS Federal Reserve Consumer Help Center](#)  
**Subject:** FDIC Referral - 01427572 [REDACTED]  
**Date:** Tuesday, July 26, 2022 12:50:34 PM  
**Attachments:** [Referral Email.pdf](#)  
[01427572.pdf](#)

This message was sent securely using Zix®

Please find attached a consumer complaint/inquiry involving Security Financial Bank referred to your agency.

Thank you,

Consumer Response Unit  
National Center for Consumer and Depositor Assistance  
Federal Deposit Insurance Corporation

This message was secured by Zix®.

This message was secured in transit. REP-ZFRSSE



Division of  
Depositor and  
Consumer Protection

National Center for Consumer & Depositor Assistance  
1100 Walnut Street, Box #11  
Kansas City, Missouri 64106  
Toll Free: (877) 275-3342; Option 2

July 26, 2022  
Ref. No.: 01427572

Re: Security Financial Bank

Dear [REDACTED]:

Thank you for your correspondence, which was received by the FDIC's Consumer Response Unit.

The FDIC's mission is to ensure the stability of and public confidence in the nation's financial system. To achieve this goal, the FDIC has insured deposits and promoted safe and sound banking practices since 1933. We are responsible for supervising state-chartered, FDIC-insured institutions that are not members of the Federal Reserve System.

Based on our review of your correspondence, the bank you referenced is under the direct supervision of the **Federal Reserve**. We are forwarding a copy of your correspondence to this agency at the address below:

**Federal Reserve**  
**PO Box 1200**  
**Minneapolis, MN 55480**  
**Website: [www.federalreserveconsumerhelp.gov](http://www.federalreserveconsumerhelp.gov)**  
**Telephone: 1-888-851-1920**

Please direct any future concerns to the **Federal Reserve**. Thank you for taking the time to submit your correspondence.

Sincerely,  
Consumer Response Unit  
National Center for Consumer and Depositor Assistance  
Federal Deposit Insurance Corporation  
Telephone: (877) ASK-FDIC

## COMMUNITY REINVESTMENT ACT

### CRA Written Public Comment - 2022

INTERNAL FR

## Customer Assistance Form

FDIC 3064-0134 Expiration Date: XX/XX/XXXX

### Privacy Act Statement

Collection of this information is authorized by 12 U.S.C. §§ 1818 and 1819 and 15 U.S.C. § 57a(f). The information you provide to the FDIC on this form will be used to investigate and respond to your complaint or inquiry. The information you provide may be disclosed to the institution which is the subject of the complaint or inquiry and to any third party sources, when necessary to investigate or resolve the complaint or inquiry; to the Federal or State supervisory authority that has direct supervision over the financial institution that is the subject of the complaint or inquiry; to appropriate Federal, state or local authorities agencies if a violation or possible violation of a civil or criminal law is apparent; to a congressional office in response to an inquiry made at your request; to a court, magistrate or administrative tribunal in the event of litigation, or in accordance with the other "routine uses of records" listed in the FDIC's Consumer Complaint and Inquiry System of Records, # 30-64-0005. Completing this form is voluntary, but failure to provide all of the information may delay or preclude investigation of your complaint or inquiry.

Last Updated 09/23/2015

### Paperwork Reduction Act Statement

Public reporting burden for this collection of information is estimated to average .25 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and review the collection of information.

Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Paper Reduction Act Clearance Officer, Legal Division, Federal Deposit Insurance Corporation, 550 17th Street, N.W., Washington, D.C. 20429, and the Office of Management and Budget, Paperwork Reduction Project (3064-0134), Washington, D.C. 20503.

An agency may not conduct or sponsor, and a person is not required to respond to, a collection unless it displays a currently valid OMB control number.

Last Updated 09/23/2015

**Please complete this form if you have an inquiry or a complaint regarding your financial institution. Once the form has been submitted you will receive the Customer Assistance Confirmation page indicating that your request has been received.**

#### Please note:

- We cannot act as a court of law or as a lawyer on your behalf.
- We cannot give you legal or financial advice.
- We cannot become actively involved in complaints that are in litigation or have been litigated.

\* Required Fields

Indicate whether you are a: Consumer

#### Requester Information:

Salutation \_\_\_\_\_  
\*Last Name \_\_\_\_\_ \*First Name \_\_\_\_\_  
Middle Name \_\_\_\_\_  
\*Email \_\_\_\_\_

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## COMMUNITY REINVESTMENT ACT

### CRA Written Public Comment - 2022

Home Phone [REDACTED] Business Phone [REDACTED] Mobile Phone [REDACTED] INTERNAL FR  
 \*Mailing Street [REDACTED]  
 \*Mailing City [REDACTED] \*Mailing State/Province WI  
 \*Mailing Zip/Postal Code [REDACTED]  
 \*Mailing Country United States  
 Best Way to Contact [REDACTED] Email [REDACTED]  
 Best Time to Contact [REDACTED]

Is this request submitted on behalf of you and another individual? Yes

\*Last Name [REDACTED] \*First Name [REDACTED]  
 Email [REDACTED]  
 Home Phone [REDACTED] Business Phone [REDACTED] Mobile Phone [REDACTED]  
 \*Mailing Street [REDACTED]  
 \*Mailing City [REDACTED] \*Mailing State/Province WI  
 \*Mailing Zip/Postal Code [REDACTED]  
 \*Mailing Country United States

#### Additional Contact Information:

Do you want us to communicate with another individual on your behalf, such as a family member, attorney, or other person representing you about this complaint? No

If you list someone you authorize us to communicate with the listed individual and provide information to that individual as well.

\*Representative Last Name [REDACTED] First Name [REDACTED]  
 Relationship [REDACTED] Email [REDACTED]  
 Home Phone [REDACTED] Business Phone [REDACTED] Mobile Phone [REDACTED]  
 \*Mailing Street [REDACTED]  
 \*Mailing City [REDACTED] \*Mailing State/Province [REDACTED]  
 \*Mailing Zip/Postal Code [REDACTED]  
 \*Mailing Country [REDACTED]

Does your request involve a specific financial institution? Yes

\*Financial Institution Security Financial Bank  
 Mailing Street 212 W Prospect St,  
 \*Mailing City DURAND \*Mailing State/Province WI  
 \*Mailing Zip/Postal Code 54736  
 \*Mailing Country United States  
 Institution Phone [REDACTED]  
 Number [REDACTED]  
 FI: Type of accounts Other Loan

Have you tried to resolve your complaint with your financial institution or company? Yes

\*When? 07/26/2022 \*Resolve: How Phone [REDACTED]  
 Email with mortgage lender

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### CRA Written Public Comment - 2022

Resolve: Contact Name	Resolve: Title	INTERNAL FR
<b>Have you filed a complaint or contacted another government agency?</b>		No
*Gov Agency: Agency Name		

#### Complaint Information:

Describe events in the order in which they occurred, including any names, phone numbers, and a full description of the problem with the amount(s) and date(s) of any transaction(s). Do not include personal or confidential information such as your social security, credit card, or bank account numbers. If you need to provide **COPIES** of any supporting documentation such as contracts, monthly statements, receipts or any correspondence with the bank (do not send original documents), you may mail or fax this information to:

#### \*Please describe below the nature of your complaint or inquiry.

We bought a lot with this bank with pre-approval for construction loan financing. After meeting this mortgage lender in person to complete our lot purchase, Redlining has taken affect since. Per there website 10% down. We were informed we would need 20%. Then after submitting much documentation, we were notified of a counter offer where we would need almost 40% down, due to some income discrepancy for my husband, we had turned in paystubs, w-2s, tax returns, all which match which was reported by the employer but due to a raise in 2021 actually making more this year which was also reported by employer. They were claiming work may be seasonal and significantly reduced the amount of loan they could offer even though documentation says otherwise. We have been sending documentation since beginning of June 2022 for this construction loan and they still have not ordered an appraisal, and now want to reduce loan amount. They have made this process undoable as a consumer, knowing we would not be able to accept. We are no longer proceeding with this financial institution for our construction loan, yet this Redlining needs to be reported. I have saved all email correspondence with this agency who has also avoided all phone communication with me as a consumer. We were working with the River Falls WI 54022 location and apparently unknown underwriters.

Please be advised that the issues described in this complaint will be shared with the financial institution or company in question for their response.

#### \*Desired Resolution

What action by the financial institution or company would resolve this matter to your satisfaction?

Nothing, what has happened is a definition of redlining and we have no desire to continue working with this entity.

☒ \*Checking this box authorizes the FDIC to respond to your inquiry

FDIC 6422/04 (9-12)

Page Updated 12/11/2018