

**From:** Rachel Schuette  
**To:** [Regulatory Comments](#)  
**Subject:** Security Bank & Trust Co. Comments on Chartering and Field of Membership Proposed Rule  
**Date:** Tuesday, December 3, 2019 10:10:06 AM

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Dear Secretary of the Board Poliquin,

I am writing in response to the National Credit Union Administration's (NCUA) proposal to amend its chartering and field of membership (FOM) rules with respect to applicants for a community charter approval, expansion, or conversion. Security Bank & Trust Co. does not believe that the proposed framework will adequately guard against discriminatory redlining and recommends that NCUA adopt the anti-discrimination tools utilized by other federal banking agencies.

If the agency wants to ensure that its supervised federal credit unions do not discriminate by redlining urban cores, then it should employ some of the same tests and assessments that my regulator uses with my bank.

Sincerely,

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