

## Housing Discrimination Complaint

**Case Number:**

**1. Complainants:**

D.R. and S.R.

**Complainant Representative:**

Sara Pratt  
Relman Colfax, PLLC

1225 19th Street, NW, # 600  
Washington, DC 20036

**2. Other Aggrieved Parties:**

TBD

**4. The following is alleged to have occurred or is about to occur:**

- Discriminatory advertising, statements and notices
- Discriminatory financing (includes real estate transactions)
- Discriminatory terms, conditions, privileges, or services and facilities

**5. The alleged violation occurred because of:**

- Familial Status
- Disability

**6. Address and location of the property in question (or if no property is involved, the city and state where the discrimination occurred):**



Southampton, PA  
18966

**7. Respondent:**

Police and Fire Federal Credit Union  
c/o James Duke, President/Chief Operating Officer  
901 Arch Street  
Philadelphia, PA 19107

**8. The following is a brief and concise statement of the facts regarding the alleged violation:**

Complainants allege Respondent violated Sections 804(b), 804(c), 804(f)(2) and 805 of the Fair Housing Amendments Act of 1988 (the Act) because of familial status and disability.

Alleged violation of Sections 804(b) - Discriminatory terms, conditions, privileges, or services and facilities because of familial status; 804(c) Discriminatory statements because of familial status and disability; 804(f)(2) - Discriminatory terms, conditions, privileges, or services and facilities because of disability; and 805 Discrimination in Residential Real Estate-Related Transactions because of familial status and disability

On or about February 2021, Complainants decided to apply for a home renovation loan. Because they were members of the Police and Fire Federal Credit Union, (the "Respondent"), they decided to apply for the home renovation loan with the Respondent.

On or about February 18, 2021, Respondent ran the Complainants' credit and Respondent's representative advised the Complainants that they were conditionally approved and told the Complainants that their supplemental documentation would be due in ten days, or on February 28, 2021.

On or about February 18, 2021, Complainant D.R. advised the Respondent's representative that his wife (Complainant S.R.) was on paid maternity leave and was receiving her full paycheck for the entire time she would be on leave. In response, Respondent's representative told Complainant D.R. that the Respondent treated maternity leave as short-term disability, and that the Respondent might not be able to accept it for that reason. Respondent's representative further told Complainant D.R. that the Complainants might need to reapply 30 days after Complainant S.R. returned to work.

Complainants allege that on or about February 18, 2021, and February 22, 2021, Respondent's representative told them that they would have to wait and reapply 30 days after Complainant S.R. returned to work and had at least two pay stubs that

did not have "FMLA" (Family and Medical Leave Act) on them. This statement both denied the Complainants' loan application and constituted an adverse action because Complainant S.R. was on maternity leave.

To the extent that the Respondent relied on a short-term disability policy, that policy was itself discriminatory because it excludes borrowers with short-term disabilities from loan consideration regardless of their available resources and denies loans without an individualized assessment of the qualifications of the borrower or their return-to-work date.

Subsequently, the Complainants received a notice, dated February 23, 2021, stating that their file had been closed because of incompleteness. This was inaccurate. In effect, the Complainants' loan application was denied. The notice was sent and received before the date on which the Complainants' supplemental documentation would have been due.

Subsequently, the Complainants applied for and were approved for a home renovation loan from another lender.

**9. The most recent date on which the alleged discrimination occurred:**

February 23, 2021

**10. Types of Federal Funding Identified:**

N/a

**11. The acts alleged in this complaint, if proven, may constitute a violation of the following sections:**

804(b), 804(c), 804(f)(2) and 805 of Title VIII of the Civil Rights Act of 1968 as amended by the Fair Housing Amendments Act of 1988.

**Please sign and date this form:**

**I declare under penalty of perjury that I have read this complaint (including any attachments) and that it is true and correct.**

11/1/2021

\_\_\_\_\_  
S.R.

\_\_\_\_\_  
Date

