



**City of Milwaukee Common Council
Community & Economic Development Committee**
**Data Analysis of 2021 HMDA
& Lending Best Practices**

Part of the Homeownership Disparity Data Educational Series



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Who We Are

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Take Root Milwaukee (TRM), Milwaukee's homeownership consortium, is a program of UEDA
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Presentation Overview

1. Present the data

- Racial & economic disparities related to homeownership and credit access
- Mortgage lending activity in 2021

2. Share Best Practices & Resources

How can lenders and community partners work together to make homeownership more equitable?

NOTE: This presentation was originally shared in December 2022 as part of a TRM educational webinar series.

About Take Root Milwaukee (TRM)

A consortium of **58** community-based organizations, housing counseling agencies, local government, Realtors, lenders and other partners working to promote sustainable homeownership in the City of Milwaukee that was established in 2010.

We do this with two main areas of focus:

- 1. Public** – Promoting trusted resources (website, hotline, events – “one-stop shop”), hosting homeownership outreach events to strengthen the first-time, first-generation homebuyer pipeline, and increasing referrals among members for services such as homeownership education, foreclosure assistance, affordable lending products, down payment assistance, home repair programs, etc.
- 2. Practitioner** – Establishing a network for idea-sharing, relationship-building; meeting Community Reinvestment Act (CRA) goals; promoting news, programs, products, and events related to the sector; providing scholarship dollars for continuing education and training; and providing timely education through quarterly meetings and roundtables.

A little more about Home Mortgage Disclosure Act (HMDA) Data

- The Home Mortgage Disclosure Act was enacted in 1975 by Congress.
- It requires all financial institutions that make over 100 home loans during the calendar year to provide mortgage data to the public.
- This data helps show whether lenders are serving the housing needs of their communities, gives public officials information that helps develop policies, and sheds light on lending patterns that could be discriminatory.
- Since 2012 Take Root Milwaukee has compiled an annual analysis of HMDA data to assess lending trends in the marketplace.
- This series helps us deepen our understanding of access to credit and the racial disparities we see in homeownership rates.
- The data helps inform our response.

What Kind of Data Do We Have?

Economic data by race/ethnicity

- *Most recent American Community Survey averages from the City of Milwaukee Department of City Development*

Home Mortgage Disclosure Act (HMDA) Data

- *Lending Patterns Database reports, via the Metropolitan Milwaukee Fair Housing Council*

Top 25 Lenders: City of Milwaukee

- *Purpose: Home Purchase, Refinance, Cash-out Refi, Home Improvement*
- *Who: Loans to Non-white Borrowers, Loans to LMI Borrowers*

Why Take Root Milwaukee looks at HMDA data every year

Informative:

- We get a sense of what the lending market looks like (who, what, where)

Comparative:

- What changes do we see year-to-year?
- Where are loans being made - and to whom?
- Which lenders do particularly well with home lending to non-white and low- to moderate-income (LMI) borrowers?

Support & Strengthen Our Work To...

- Develop strategies that promote lending in underserved areas and borrowers
- Identify new lenders entering the marketplace to engage in our work

Recap: Framework for These Webinars

- The homeownership gap between Black, Latino and White households is wider now than it was in 1960.
- Applicants of color experience higher mortgage denial rates than white applicants
 - *This was also demonstrated during TRM's webinar looking at 2020 HMDA Lending Disparity Profiles.*
- Data showed that credit history was listed as the main reason for these denials.
- Mortgage underwriting standards also reflect the legacy of systemic racism.

October 2021 Housing & Housing Finance blog

The Urban Institute

“Closing the Homeownership Gap Will Require Rooting Systemic Racism Out of Mortgage Underwriting”

Key Points from the blog: *Credit, Collateral & Capacity*

- Communities of color were denied access to services that helped them build credit; this means they are less likely to meet lenders’ credit requirements.
- Due to exclusionary practices, communities of color had limited housing options. Segregation often limited them to neighborhoods near industrial sites and/or with reduced property values.
- This has had detrimental effects over generations in terms of wealth-building, impacting their ability to increase financial resources for items like down payments, home repairs, etc.

Racial & Economic Disparities

Homeownership Rate

HOMEOWNERSHIP RATE				
	Overall	Black/African American	Hispanic/Latino	White
City of Milwaukee	40.9%	26.8%	38.9%	55.2%
Milwaukee County	49.3%	29.2%	41.1%	62.2%

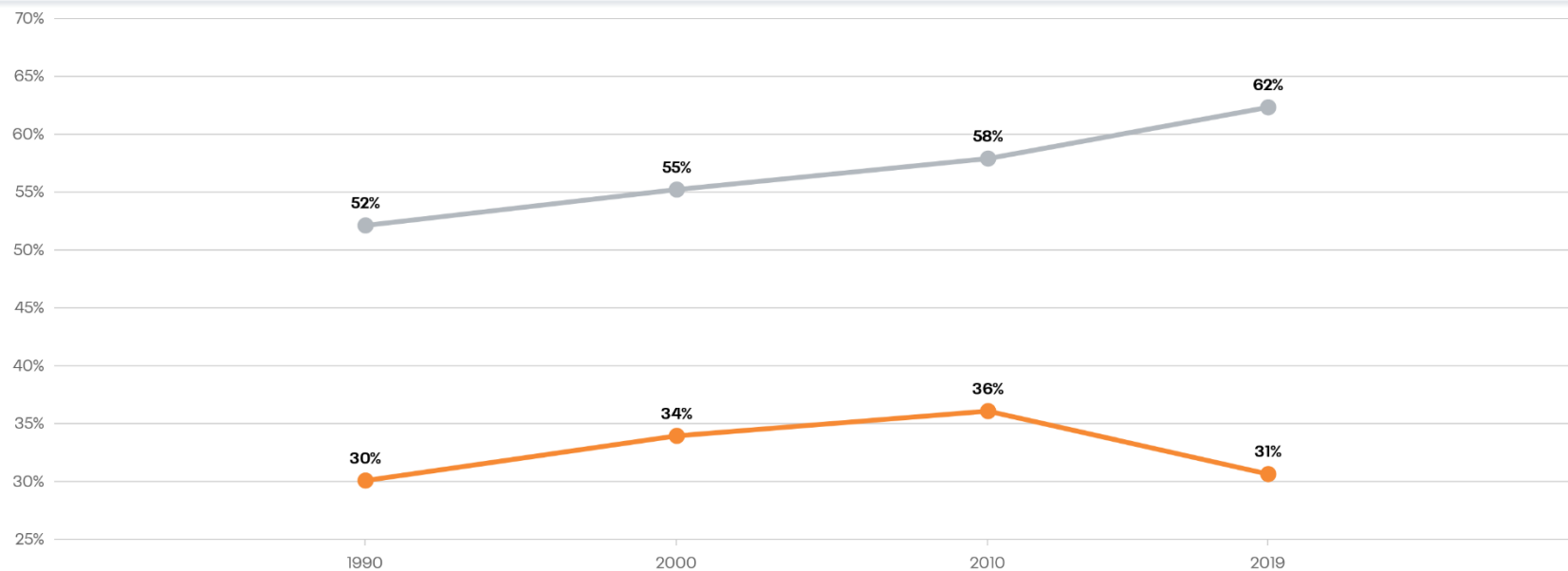
Source: American Community Survey (ACS) Data, 2021 5-Year Average
Provided by the City of Milwaukee Department City of Development

Racial & Economic Disparities

Homeownership Rate

Percent owner-occupied households by race/ethnicity: Milwaukee, WI; 1990-2019

People of color White



Data source: IPUMS-USA | National Equity Atlas

Source: Policy Link National Equity Atlas (<https://nationalequityatlas.org/indicators/Homeownership#/>)

Homeownership disparities by race/ethnicity have been steady or increased since 1990, particularly since the Foreclosure Crisis & Great Recession (2007).

Racial & Economic Disparities

Household Income

MEDIAN HOUSEHOLD INCOME				
	Overall	Black/African American	Hispanic/Latino	White
City of Milwaukee	\$45,318	\$32,467	\$45,016	\$63,030
Milwaukee County	\$54,793	\$35,040	\$50,098	\$69,426

Source: Source: American Community Survey (ACS) Data, 2021 5-Year Average
Provided by the City of Milwaukee Department City of Development

Racial & Economic Disparities

2021 HMDA Lending Disparity Profile

LendingPatterns

Lending Disparity Profile by race, gender and age

Year: 2021 Snapshot (6/16/22)

Lender(s): All Lenders

All applications/loans (purchase, refinance & home improvement)

Geography: Milwaukee city (WI)

Filters: None

Race	Originations		Denials		Fallout		Purchased	Total
	#	%	#	%	#	%	Loans	Apps
White	10,657	70.62	1,601	10.61	2,832	18.77	548	15,638
Black	2,803	49.81	1,357	24.12	1,467	26.07	81	5,708
Hispanic	2,253	58.81	786	20.52	792	20.67	53	3,884
Asian	827	61.53	215	16.00	302	22.47	30	1,374
Native American	49	59.04	16	19.28	18	21.69	1	84
Hawaiian	9	69.23	1	7.69	3	23.08	0	13
MultiRace	221	60.88	60	16.53	82	22.59	8	371
Unk/NA	2,652	59.03	742	16.51	1,099	24.46	1,829	6,322
Totals	19,471	63.13	4,778	15.49	6,595	21.38	2,550	33,394

- **Originations** were significantly higher for white applicants than Black and Hispanic, and **Denials** were significantly lower for white applicants.
- **Fallout** refers to loans that fell out of the loan application process. The applicant may have gotten frustrated with the process, or simply decided to go with another lender.

TAKEAWAYS

Racial & Economic Disparities

Questions?

...And Considerations:

- (1) How can we decrease the homeownership disparity gap?
 - For Black/African Americans = 28.4 point gap
 - For Hispanic/Latino = 16.3 point gap
- (2) What can we do to address racial & economic disparities in accessing credit, collateral, and capacity?
- (3) How can we decrease the number of “fallouts” and increase the number of originations for non-white borrowers?

Lending Data: City of Milwaukee

Loan Purpose	2019	2020	2021
	10,127	15,140	16,861
Home Purchase	5,076	5,720	6,458
<i>% of total</i>	50%	38%	38%
Refinance	2,344	6,456	6,132
<i>% of total</i>	23%	43%	36%
Cash-Out Refi	1,381	1,757	2,710
<i>% of total</i>	14%	12%	16%
Home Improvement	795	769	931
<i>% of total</i>	8%	5%	6%
All Loans to Non-White Borrowers	3,225	4,464	5,657
<i>% of total</i>	32%	29%	34%
All Loans to LMI Borrowers	4,817	6,365	7,736
<i>% of total</i>	48%	42%	46%

Loan data includes Originations (loans that were actually made, not applications), Owner-Occupied only.

In 2018, Refinances were separated into two categories (Cash-Out Refi vs. Refi)

City of Milwaukee Lending Trends

Key Takeaways:

10% increase in all loans from 2020 to 2021 (or 1,721 more loans)

- # of loans continued to increase, nearly doubling from 2018 (8,454) to 2021 (16,861)
- While refinance activity declined from 2020, it still makes up more than 50% of overall loan activity
 - 11% increase from 2020 to 2021 in Purchase loans (+324)
 - 5% decrease in Refinance loans (-324 loans)
 - 35% increase in Cash-Out Refinance (+954 loans)
- Home Improvement lending increased **by 17%** (in 2020 it had decreased)
- **Loans to Non-White Borrowers continue to increase**
 - 21% from 2020 (+1,193 loans). This exceeds the trend in all loans (10%)
- Lending to LMI borrowers continues to trend upwards, with an increase of 18% (+1,371 loans) from 2020.



WOW!

DISCUSSION: *Lending Trends* Questions?

Key Takeaways:

- Mortgage lending overall continued with strong increases in volume year-to-year, a reflection of the strong homeownership market in 2021.
- Refinance activity shifted to Cash-Out Refi's with owners taking advantage of low interest rates and home equity.
- Loans to Non-White borrowers continued to increase significantly from previous years.
 - *For example, in 2018 the total # of loans to non-white borrowers was 2,718. In 2021 it more than doubled by 2,900+ loans to 5,657.*

Top Home Lenders - City of Milwaukee

2021 Top 10: All Loan Purposes
1. Landmark Credit Union
2. UW Credit Union*
3. Educators Credit Union
4. Rocket Mortgage
5. Summit Credit Union
6. Associated Bank*
7. Fairway Independent Mortgage Co.
8. Wells Fargo Bank*
9. U.S. Bank*
10. United Shore Financial Services

2020 Top 10: All Loan Purposes
1. Landmark Credit Union
2. Educators Credit Union
3. UW Credit Union
4. Associated Bank*
5. Quicken Loans
6. Summit Credit Union
7. Fairway Independent Mortgage Co.
8. U.S. Bank*
9. Wells Fargo Bank*
10. Johnson Bank*

Loan data includes Originations (loans that were actually made, not applications), Owner-Occupied only.

*Take Root Milwaukee Member

2021 Lenders: City of Milwaukee

By Loan Purpose

Top 10 Home Purchase	Top 10 Refinance	Top 10 Cash-Out Refi	Top 10 Home Improvement
1. Fairway Ind. Mortgage	1. Landmark CU	1. Educators CU	1. Landmark CU
2. Associated Bank*	2. UW Credit Union*	2. Landmark CU	2. UW Credit Union*
3. Landmark Credit Union	3. Rocket Mortgage^	3. Rocket Mortgage^	3. Summit CU
4. UW Credit Union*	4. Wells Fargo Bank*	4. UW Credit Union*	4. BMO Harris Bank*
5. Educators Credit Union	5. Freedom Mortgage	5. Summit CU	5. Educators CU
6. United Shore Financial^	6. Summit Credit Union	6. Wells Fargo Bank*	6. U.S. Bank*
7. Johnson Bank*	7. Educators CU	7. BMO Harris Bank*	7. Associated Bank*
8. CMG Mortgage	8. U.S. Bank*	8. Loan Depot^	8. Johnson Bank*
9. WI Mortgage Corp.	9. JPMorgan Chase*	9. Associated Bank*	9. North Shore Bank*
10. Rocket Mortgage^	10. Associated Bank*	10. United Shore Fin^	10. Newrez^

Loan data includes Originations (loans that were actually made, not applications), Owner-Occupied only.

*Take Root Milwaukee Member

^New to Top 25 in 2021

DISCUSSION: *Top Lenders*

Questions?

- Credit unions continue to have a strong market presence.
- Sorting by Loan Purpose shows more context
 - *In Purchase, Fairway Independent Mortgage moved to the top spot*
- In the Top 25 we continue to see new mortgage companies.
 - *United Shore Financial Services, LoanDepot*
- Cash-Out Refi and Home Improvement have new/different lenders that aren't in the other categories.

Cash-Out Refi: Prime Financial Credit Union, Amerisave Mortgage, Pennymac Loan Services, Tri City National Bank, Great Midwest Bank, Finance of America Mortgage, Appletree Credit Union

Home Improvement: Trustone Financial, GSF Mortgage, First-Citizens, Tri City National Bank, Home Loan Investment Bank, Waukesha State Bank, Guardian Credit Union, Old National/First Midwest, Discover Bank, Figure Lending, Broker Solutions, Huntington Bank, Ally Bank, Home Point Financial Corp, Port Washington State Bank, Pentagon Federal CU

Top Lenders: Non-White Borrowers

Number of Loans – for all loan purposes

City of Milwaukee 2021 Top 10: Loan #	City of Milwaukee 2020 Top 10: Loan #
1. Landmark CU	1. Landmark CU
2. Educators CU	2. Educators CU
3. Associated Bank*	3. Associated Bank*
4. UW Credit Union*	4. U.S. Bank*
5. Rocket Mortgage^	5. Summit Credit Union
6. Summit Credit Union	6. UW Credit Union*
7. U.S. Bank*	7. Johnson Bank*
8. Freedom Mortgage	8. Quicken Loans
9. Fairway Independent Mortgage	9. Freedom Mortgage^
10. Johnson Bank*	10. Fairway Independent Mortgage

Loan data includes Originations (loans that were actually made, not applications), Owner-Occupied only.

% Share = percent of their total loans made to non-white borrowers

**Take Root Milwaukee Member*

^New to Top 25 in 2021

Top Lenders: Non-White Borrowers

Share of Loans - all loan purposes

City of Milwaukee 2021 Top 10: % Share	City of Milwaukee 2020 Top 10: % Share
1. Johnson Bank*	1. Marine
2. Freedom Mortgage	2. Associated Bank*
3. Associated Bank*	3. U.S. Bank*
4. Educators Credit Union	4. Educators Credit Union
5. U.S. Bank*	5. Wintrust*
6. CMG Mortgage	6. Johnson Bank*
7. United Shore Financial Svcs^	7. Cherry Creek Mortgage^
8. BMO Harris Bank*	8. Freedom Mortgage^
9. North Shore Bank*	9. Cardinal Financial
10. JPMorgan Chase*	10. North Shore Bank*

Loan data includes Originations (loans that were actually made, not applications), Owner-Occupied only.

% Share = percent of their total loans made to non-white borrowers

**Take Root Milwaukee Member*

^New to Top 25 in 2021

Top Lenders: LMI Borrowers

Number of Loans – for all loan purposes

City of Milwaukee 2021 Top 10: Loan #	City of Milwaukee 2020 Top 10: Loan #
1. Landmark CU	1. Landmark CU
2. Educators CU	2. Educators CU
3. Rocket Mortgage [^]	3. Associated Bank*
4. UW Credit Union*	4. UW Credit Union*
5. Associated Bank*	5. Quicken Loans
6. Fairway Independent Mortgage	6. Summit Credit Union
7. Summit Credit Union	7. U.S. Bank*
8. United Shore Financial Services [^]	8. Fairway Independent Mortgage
9. U.S. Bank*	9. Johnson Bank*
10. Wells Fargo Bank*	10. WI Mortgage Corp.

Loan data includes Originations (loans that were actually made, not applications), Owner-Occupied only.

% Share = percent of their total loans made to LMI borrowers

*Take Root Milwaukee Member

[^]New to Top 25 in 2021

Top Lenders: LMI Borrowers

Share of Loans – for all loan purposes

City of Milwaukee 2021 Top 10: % Share	City of Milwaukee 2020 Top 10: % Share
1. BMO Harris Bank*	1. Associated Bank*
2. CMG Mortgage	2. BMO Harris Bank*
3. United Shore Financial Services^	3. Marine
4. Associated Bank*	4. LeaderOne Financial Corp.^
5. Johnson Bank*	5. CMG Mortgage
6. Inlanta Mortgage	6. Tri City National Bank
7. North Shore Bank*	7. U.S. Bank*
8. Rocket Mortgage^	8. Bank of England
9. JPMorgan Chase*	9. Cherry Creek Mortgage^
10. Fairway Independent Mortgage	10. Cardinal Financial

Loan data includes Originations (loans that were actually made, not applications), Owner-Occupied only.

% Share = percent of their total loans made to LMI borrowers

*Take Root Milwaukee Member

^New to Top 25 in 2021

DISCUSSION

Reaching Underserved Borrowers

Look at both volume/number of loans AND share

- *It's useful to think about lenders that reach more borrowers at a share of overall lending (vs. volume)*
- *This can broaden our thinking around who is reaching underserved borrowers more effectively*

These Top 10 lists have strong overlap with the Top 10 list for All Loans

- *Some changes from year-to-year (who is active in different categories)*
- *Lenders with a strong local presence do better in terms of reaching underserved borrowers*
- *Mortgage companies and banks are increasing the share of their loans to LMI and/or Non-White borrowers*
- *Credit unions do better in terms of volume vs. share*

Recap: What We Have Learned

Overall mortgage lending continued to see big increases year-to-year

- *In 2021, Home Purchase loans increased significantly (vs. Refinances in past years)*
- *Loans to Non-White and LMI borrowers continue to trend upwards*

Out of our Top 10 and 25 lists, who are the most active lenders in our markets?

- *Credit unions, TRM members, mortgage companies*

Who has the largest share that goes to Non-White & LMI borrowers?

- *We know a lot of them!*
- *Banks are increasing the share of their loans to LMI and/or Non-White borrowers*
- *Impact of Community Reinvestment Act (CRA) obligations for many financial institutions (they have to focus on this) – Many banks are committing to CBAs.*
- *Credit unions do better in terms of volume vs. share*

Geography is also a consideration

- *TRM Lenders have a strong local presence & many actively engage with the community.*
- *They do very well or better in reaching underserved areas.*

Other Market Dynamics

- Increasing use of VantageScore (could help increase access to credit)
- Tight real estate inventory pricing out borrowers that don't have access to cash & savings
- Milwaukee's high number of duplexes represent an opportunity to increase ownership & build wealth
- The continued impact of biased appraisals and access to insurance
- Influx of cash and/or bulk buyers in the market (not represented in this data).
- "Green" or energy-efficient loan and grant programs that help offset purchase-rehab costs for older housing stock.
- Lenders that are not CRA-regulated or are not a traditional bank (i.e. mortgage companies, credit unions, etc.) that reach a lot of borrowers.

*See handout from TRM and
MMFHC for more ideas!*

What We Know Works

1. What can we do **to ensure that ALL lenders (not just bankers CRA) are doing everything possible** to get potential borrowers to the table? *(i.e. get them to the door, then to closing)*
2. What can we do **to increase loans to non-white borrowers, first-time homebuyers, first-generation home buyers?** *(i.e. increase originations, decrease fallouts)*
 - Narrow the gap between the % of loans issued to non-white, LMI borrowers so they more closely match the demographics of the MSA or county they serve.
 - Promote and use downpayment assistance (DPA).
 - Support nonprofit homebuyer educators (who help increase the pipeline).
 - Partner with trusted community-based organizations.
 - Invest in and support alternative models like Community Land Trusts.
 - Employ community-savvy loan officers (bilingual & culturally competent) who reflect the diversity of the community around their branches.
 - Employ loan officers that will work with borrowers to achieve the best fit for each person's specific needs.
 - Offer loan products designed to meet needs (i.e. smaller loans for modestly-priced homes).

Strategies from 2021 Urban Institute blog

- Offer **targeted down payment assistance** (borrowers acquire less debt, lower housing costs & increase capacity)
- Embrace **other models such as community land trusts** that facilitate homeownership stability
- Eliminate price differentials due to credit and down payment
- **Promote lending to people of color in partnership with Freddie Mac and Fannie Mae** (Duty to Serve plans)
- Offer protections for homeowners who experience income shocks, preserving their investment
- Streamline refinancing to enable borrowers to lower housing costs & capture equity
- **Implement special-purpose credit programs** that help make homeownership accessible (very active by lenders in the past year)

Items highlighted in green are being actively pursued in Milwaukee

CONSIDERATIONS...

What affects our ability to close these gaps?

Consumer mindsets

- Getting those in the door who may think homeownership is out of reach

How important is culture vs. product? Credit is #1...

- BUT culture can drive change in how to address Collateral (i.e. DPA) and Capacity
- Relationships instead of transactions = How we get to YES
- Culture that pushes lenders to do better in underserved markets and service providers to act as navigators and coaches

Ensuring new homeownership program investments reach non-white borrowers (we want to make gains in closing the disparity gap)

- Recent, local investments in DPA have seen great success - participation rates for communities of color were very high
- Lack of savings IS a barrier, DPA helps motivate

City of Milwaukee Actions & Strategies

Affordable Homeownership

- Founding member in Take Root Milwaukee
- City-sponsored Milwaukee Home Down Payment Program
- Financial support through the Housing Trust Fund
- Home Repair Resources (i.e., Strong Homes Loan Program and the Code Compliance Loan Program)
- Support for Alternative Housing Models (Milwaukee Community Land Trust)
- Homes MKE (providing renovated homes for homeownership)
- Priority and resources for the purchase of City-owned properties for homeownership
- Land for the development of new single-family housing (i.e., Habitat for Humanity)

Affordable Rental

- Financial support for the development of affordable rental housing (Housing Trust Fund, HOME funds, Tax Incremental Districts)
- Anti-Displacement Preference Policy (prioritizing new affordable rental units for residents residing in neighborhoods where project is located)
- Low-cost land and buildings for the development of affordable rental housing

Key Resources & Partnerships

- City [Housing Affordability Report \(2022\)](#)
- “Housing Help” web tool for housing resources in the community
- Active member of Take Root Milwaukee & Reclaiming Our Neighborhoods (RON) coalition
- Partner in the Community Development Alliance (CDA) *Collective Affordable Housing Plan* & implementation strategies
- ECO Office housing initiatives

Additional Resources

- **Top 25 HMDA Analysis Excel worksheet** for City of Milwaukee & Milwaukee County
- **Handout:** “Suggestions for increasing loans to people of color and low and moderate income neighborhoods” (MMFHC & TRM)
- **Metropolitan Milwaukee Fair Housing Council**
 - Additional fair lending reports, customized for you
 - Information on strategies to promote Responsible Banking and Anti-Displacement practices
 - Community Reinvestment Act (CRA) advocacy
- **Bank On Greater Milwaukee Coalition**
 - Focuses on retail banking access (national certified account model)
 - Partnerships with community-based organizations, financial institutions, FDIC, bankers’ associations, government
 - “Advocacy Map” tool showing locations of bank branches in the City in proximity to alternative financial institutions, with layers for population by race and ethnicity, persons with disabilities, household income, household vehicle access, employment, and linguistical isolation.
<https://bankonmilwaukee.org/advocacymap/>

Sample of Top 25 HMDA Analysis worksheet (City of Milwaukee)

Provided with slide deck

Name	TRM	Total Loans (Originations)	Purchase Loans	Refinance Loans	Cash-Out Refinance Loans	Home Improvement Loans	Loans to Non-white Borrowers	Share of loans to Non-white Borrowers	Loans to LMI Borrowers	Share of loans to LMI Borrowers
Landmark Credit Union		1596	272	635	309	332	504	32%	723	45%
UW Credit Union	Y	1114	256	426	148	187	236	21%	374	34%
Educators Credit Union		968	226	241	356	35	457	47%	446	46%
Rocket Mortgage*		741	145	347	241	2	234	32%	376	51%
Summit Credit Union		732	107	286	110	101	192	26%	247	34%
Associated Bank	Y	624	378	142	59	23	306	49%	357	57%
Fairway Independent Mortgage Corp.		596	491	71	34	0	163	27%	287	48%
Wells Fargo Bank	Y	481	77	303	99	0	96	20%	181	38%
U.S. Bank	Y	400	126	170	49	28	174	44%	192	48%
United Shore Financial Services*		342	180	108	54	0	138	40%	196	57%
Freedom Mortgage Corp.		332	23	297	12	0	166	50%	36	11%
Johnson Bank	Y	307	168	76	28	19	154	50%	167	54%
JPMorgan Chase	Y	306	116	150	40	0	105	34%	154	50%
Inlanta Mortgage		248	129	88	29	0	35	14%	131	53%
BMO Harris Bank	Y	247	48	66	69	37	99	40%	161	65%
Bank of England		231	143	71	17	0	52	23%	109	47%
The Equitable Bank		230	133	61	33	3	74	32%	103	45%
Bank Five Nine		224	109	76	39	0	55	25%	107	48%
Newrez*		224	28	137	52	7	46	21%	67	30%
CMG Mortgage		210	162	32	16	0	89	42%	134	64%
Wisconsin Mortgage Corp.		198	152	37	8	1	49	25%	86	43%
Nationstar Mortgage LLC		194	5	141	48	0	62	32%	70	36%
North Shore Bank	Y	192	31	95	29	18	72	38%	99	52%
A+ Mortgage Services		188	117	52	21	0	17	9%	63	34%
LoanDepot*		178	54	61	63	0	45	25%	80	45%
Top 25 Lenders Total:		11,103	3,676	4,169	1,963	793	3,620	33%	4,946	45%
% of All Loans in Top 25:			33%	38%	18%	7%	33%		45%	
% of All Loans in the City:		66%	57%	68%	72%	85%	64%		64%	
*New to the Top 25										
Not in Top 25, TRM Members:										
Great Midwest Bank	Y	134	57	43	22	11	47	35%	67	50%
Old National Bank / First Midwest Bank	Y	104	27	47	7	10	22	21%	43	41%
PNC Bank	Y	98	18	53	13	14	21	21%	47	48%
Bell Bank	Y	95	46	38	11	0	11	12%	41	43%
Pyramax Bank	Y	86	21	46	18	1	18	21%	41	48%
CIBC	Y	18	18	0	0	0	11	61%	12	67%
Total All Lenders in City of Milwaukee:		16,861	6,458	6,132	2,710	931	5,657		7,736	
		% of Total loans in City:	38%	36%	16%	6%	34%		46%	

Thank you for the opportunity to share this important fair lending information!



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