consequences will be discussed below. The states in the low group all had very high or one hundred per cent exemptions, except Maryland and in that state the use of garnishment is limited.[124]

Illinois raised its exemption from forty-five dollars a week to eighty-five per cent in 1961.[125] Between 1961 and 1964, the number of non-business bankruptcies filed in Illinois *declined* nine per cent; nationally during the same period they rose eighteen per cent.[126] The substantial change in exemption, one may infer, contributed to the stemming of the bankruptcy tide. As might be anticipated, the reduction in personal bankruptcies has not been overwhelming. As long as garnishments continue so will the threat of losing employment and the impulse to meet the threat by fleeing toward bankruptcy.

Iowa moved in the opposite direction. In 1957 it abolished its one hundred per cent wage exemption and substituted an inadequate exemption of thirty-five dollars a week plus three dollars per dependent.[127] Only 431 bankruptcy petitions of all kinds were filed in Iowa during the year ending June 30, 1957.[128] Since then bankruptcies in that state have been growing at a pace that is astonishing even for bankruptcy figures. Iowa bankruptcies more than quadrupled between 1957 and 1963, almost double the national rate.[129] During the same period California filings went from 11,629 to 27,068.[130] An increase at Iowa's rate would have brought California to over 44,000. Considering that California experi-

124 In Maryland a creditor can only garnish wages "actually due at the date of the attachment . . . ." MD. ANN. CODE art. 9, § 31 (Supp. 1965).

125 Note 82 *supra*.

126 The year-by-year figures, as compiled from Tables F-3 of the Annual Reports of the Director of the Administrative Office of the United States Courts for the years 1961-1964 are:

Year	Illinois	U.S.
1961	16,356	131,397
1962	13,705	132,118
1963	14,057	139,176
1964	14,900	155,193

Bankruptcies have been rising in Illinois since 1962, but at a much slower rate than in the country as a whole. The ratio of Illinois nonbusiness bankruptcies to U.S. nonbusiness bankruptcies has declined steadily: 12.4% in 1961, 10.4% in 1962, 10.1% in 1963 and 9.6% in 1964.

127 See Note, *State Wage Exemption Laws and the New Iowa Statute—a Comparative Analysis*, 43 IOWA L. REV. 555, 560 (1958).

128 1957 ANNUAL REPORT Table F-2. The report does not include nonbusiness bankruptcies; hence in the discussion of Iowa, total filings are used throughout.

129 Iowa filings were 431 in 1957, 922 in 1960, 1734 in 1963; U.S. filings were 73,761, 110,034, and 155,493 in the same respective years. 1957 ANNUAL REPORT Table F-2; 1960 *Id.* at Table F-2; 1963 *Id.* at Table F-3.

130 *Ibid.*