

2023

California Department of Financial Protection and Innovation

Annual Report of Operation of Finance Lenders, Brokers, and PACE Program Administrators Licensed Under the California Financing Law

Report Required by Financial Code Sections 22160 and 22692

PROTECTING CONSUMERS FOSTERING TRUST & INNOVATION





Tomiquia Moss, Secretary Business, Consumer Services and Housing Agency

Clothilde V. Hewlett, Commissioner Department of Financial Protection and Innovation

Gregory Young, Senior Deputy Commissioner Division of Corporations and Financial Institutions

Published January 2025

TABLE OF CONTENTS

| Executive Summary | 1 |
|---|----|
| Background | 3 |
| I. Historical Licensing Data | 4 |
| II. Analysis of Loans Made by CFL Licensees for the Last 10 Years | 5 |
| Exhibit A - Consolidated Balance Sheet | 6 |
| Exhibit B - Analysis of Loans and Receivables Outstanding | 7 |
| Exhibit C - Statement of Income and Expenses | 8 |
| Exhibit D - Analysis of Income Received | 9 |
| Exhibit E - Loans Made or Refinanced by Size | 10 |
| Exhibit F - Loans Made or Refinanced by Type of Security | 11 |
| Exhibit G - Loans Made or Refinanced by Rate Charged | 14 |
| Exhibit H - Schedule of Loan Activity by Security Type | 30 |
| Exhibit I - Default Rates by Security Type and Size of Loan | 33 |
| Exhibit J - Online Loan Information | 35 |
| Exhibit K - Property Assessed Clean Energy (PACE) Program | 36 |

EXECUTIVE SUMMARY

The Department of Financial Protection and Innovation (DFPI) protects consumers and fosters trust by regulating companies and individuals offering financial products. The DFPI licenses and regulates finance lenders, brokers, and Property Assessed Clean Energy (PACE) program administrators pursuant to the California Financing Law (CFL).

In this report, the DFPI compiles data submitted by finance lenders, brokers, and program administrators licensed under the CFL. The licensees submitted the data pursuant to Financial Code sections 22159(a), 22160, and 22692.

The data collected covers two types of loan categories: consumer loans and commercial loans.

- Consumer loans are intended primarily for personal, family or household purposes, such as paying utility and medical bills and for the purchase or repair of personal vehicles. The law also treats commercial loans with a principal amount of \$5,000 or less as consumer loans, and they are reported as such.
- Commercial loans are not intended for personal, family or household purposes.

The data collected also covers PACE contracts for consumer and, in some instances, commercial purposes.

- PACE contracts are secured by the property to which improvements are made.
- PACE contracts are paid via property tax assessments.

Consumer and commercial loans are further classified by the type of security used to secure the loan.

Key Findings: Consumer Loans

- Finance lenders originated more than 39.9 million consumer loans in 2023, a 15.1 percent increase from 34.7 million in 2022. Unsecured consumer loans with a principal amount of less than \$2,500 accounted for 97.7 percent of all consumer loans made, increasing to 39 million from 33.6 million in 2022. The total principal amount of consumer loans made in 2023 decreased by 27.7 percent in comparison to 2022 from \$68.6 billion to \$49.6 billion. Consumer loans secured by real property had the largest decrease in principal amount from \$45.9 billion in 2022 to \$28.1 billion in 2023.
- Finance lenders originated 63,710 consumer loans secured by real property in 2023, a 38.2 percent decrease from the 103,104 originated in 2022. The total principal amount of consumer loans secured by real property made in 2023 decreased by 38.9 percent in comparison to 2022 from \$45.9 billion to \$28.1 billion.
- Finance lenders originated more than 38 million "buy now, pay later" unsecured consumer loans in 2023, a 15.3 percent increase over 2022. The total principal amount of "buy now pay later" loans increased by 5.2 percent in comparison to 2022 from \$4.0 billion to \$4.2 billion.

Key Findings: Consumer Loans (Continued)

- The total number of consumer loans made in 2023, excluding loans secured by real estate and "buy now, pay later" loans, was 1.6 million with a total principal amount of \$17.3 billion.
- 35.1 million online consumer loans were originated in 2023, a 4.0 percent increase from the 33.7 million originated in 2022. The total principal amount of the same loans decreased by 20.8 percent over the same period, from \$16.4 billion to \$13 billion in 2023.

The largest decreases in principal amount of online consumer loans made in 2023 were 22.3 percent for loans secured by real property, from \$8.2 billion in 2022 to \$6.3 billion, and 60.2 percent for unsecured loans \$2,500 or more, from \$1.7 billion in 2022 to \$674 million.

Key Findings: Commercial Loans and PACE

- The number of commercial loans originated in 2023 increased by 14.3 percent from 704,570 in 2022 to 805,319. The total principal amount of commercial loans decreased by 14.4 percent over the same period, from \$180.4 billion to \$154.5 billion. Commercial loans secured by real property originated in 2023 decreased by 48.3 percent from 44,868 in 2022 to 23,192. The total principal amount of the same loans decreased by 33.6 percent over the same period, from \$88.6 billion to \$58.8 billion.
- The number of online commercial loans originated in 2023 increased by 25.3 percent from 44,198 in 2022 to 55,384. The total principal amount of online loans increased by 31.2 percent over the same period, from \$4.7 billion to \$6.1 billion in 2023.
- Exhibit K of this report contains PACE financing and PACE program administrator activity.

BACKGROUND

The California Financing Law requires DFPI to license and regulate finance lenders, brokers, or program administrators (Financial Code, § 22000 et seq.).

Effective January 1, 2020, Assembly Bill 539 (Limón, stats. 2019, ch. 708) enacted the Fair Access to Credit Act (the Act). The Act makes changes to permissible rates of charges: For any consumer loan of a bona fide principal amount of at least \$2,500 but less than \$10,000 (including commercial loans of \$2,500 to \$5,000), a finance lender may not contract for or receive charges at a rate exceeding annual simple interest of 36 percent plus the Federal Funds Rate. Prior to the Act, the CFL only limited the interest rates on consumer loans under \$2,500.

Financial Code section 22159(a) requires CFL licensees to file with the DFPI annual reports that provide information related to their lending activities under the program.

The DFPI is required annually to post a composite report of the annual reports on its website and any comments the Commissioner deems to be in the public interest, pursuant to Financial Code section 22160.

This report contains unaudited data provided by licensees for the calendar year ending December 31, 2023. The report does not capture all consumer loans in the state since all lending does not fall under the CFL and licensees self-report loans made under the authority of a CFL license.

As of December 31, 2023, the DFPI licensed 4,391 lenders, brokers, lenders and brokers, and PACE program administrators. Of these licensees, 4,241 filed the required annual reports, including all four PACE program administrators. The DFPI notified the non-filers of its intent to revoke their licenses.

Data obtained from a small number of licensees who filed annual reports after the aggregate report was compiled is not included. This omission does not materially affect the integrity of the data reported in this composite report.

Due to rounding, numbers presented throughout this report may not add up precisely to the totals provided, and percentages may not precisely reflect the absolute figures.

This report and prior years' reports can be found on the DFPI's website at <u>dfpi.ca.gov/california-financing-law-publications</u>.

I. HISTORICAL LICENSING DATA

The table below shows the number of California Financing Law (CFL) licensees (including branches) at the end of each calendar year, and the number of license applications the DFPI received each year for the last 10 years.

| Year | Number of Licensed | Number of Licensed Locations | Number of Applications for New |
|------|-----------------------|---------------------------------|-----------------------------------|
| | Companies | | Licenses |
| 2023 | 4,391 | 6,944 | 1,349 |
| 2022 | 4,459 | 7,268 | 1,982 |
| 2021 | 4,340 | 7,592 | 1,491 |
| 2020 | 3,886 | 7,194 | 1,512 |
| 2019 | 3,616 | 7,392 | 1,406 |
| 2018 | 3,493 | 7,262 | 1,503 |
| 2017 | 3,200 | 6,776 | 1,398 |
| 2016 | 2,963 | 6,521 | 1,517 |
| 2015 | 2,580 | 6,369 | 1,358 |
| 2014 | 2,185 | 5,018 | 1,254 |
| | | | |

Table 1: Licensing Data

II. ANALYSIS OF LOANS MADE BY CFL LICENSEES FOR THE LAST 10 YEARS

| Table 2: | Loan | Details |
|----------|------|---------|
|----------|------|---------|

| | | | Average | Size | of Loans M | ade | |
|-------|----------------------------|--------------------------------------|-------------------|------|-------------------|-----|----------|
| Year | Number of Loans Made | Principal Amount of Loans Made | Consumer Loans | Co | mmercial Loans | A | ll Loans |
| 2023 | 40,720,901 | \$ 204,091,045,557 | \$ 1,244 | \$ | 191,809 | \$ | 5,012 |
| 2022* | 35,385,109 | \$ 248,985,826,421 | \$ 1,978 | \$ | 256,015 | \$ | 7,036 |
| 2021* | 28,556,898 | \$ 359,612,391,476 | \$ 5,248 | \$ | 276,521 | \$ | 12,593 |
| 2020* | 12,637,105 | \$ 272,396,386,532 | \$ 9,402 | \$ | 226,868 | \$ | 21,555 |
| 2019* | 2,809,749 | \$ 247,762,782,335 | \$ 30,188 | \$ | 209,067 | \$ | 88,180 |
| 2018* | 2,471,685 | \$ 220,137,537,748 | \$ 21,139 | \$ | 218,588 | \$ | 89,064 |
| 2017* | 2,455,012 | \$ 194,240,527,082 | \$ 25,084 | \$ | 161,799 | \$ | 79,120 |
| 2016* | 2,458,476 | \$ 226,677,922,016 | \$ 27,971 | \$ | 188,155 | \$ | 92,203 |
| 2015 | 3,271,710 | \$ 232,654,056,610 | \$ 24,472 | \$ | 105,661 | \$ | 71,111 |
| 2014 | 2,711,495 | \$ 217,151,868,159 | \$ 20,674 | \$ | 121,161 | \$ | 80,086 |

*Variances from data published in the annual report due to late or revised filings by licensees.

Exhibit A California Financing Law Licensees Consolidated Balance Sheet For the Year Ended December 31, 2023 (\$ in thousands)

| ASSETS | | % of Total Assets |
|---|---------------------|---|
| Cash | \$ 99,331,644 | 3.79 |
| Investments | 392,718,551 | 14.98 |
| California Finance Lenders Loan Receivables | 235,971,360 | 9.00 |
| Other Receivables | 1,290,172,199 | 49.20 |
| Reserves and Withholds by Banks and Finance Companies | 5,024,066 | 0.19 |
| Real and Personal Property (Net) | 124,675,502 | 4.75 |
| Prepaid Expenses and Deferred Charges | 9,307,125 | 0.35 |
| Commissions Receivables | 4,269,655 | 0.16 |
| Other Assets | 460,788,894 | 17.57 |
| Total Assets | \$ 2,622,258,995 | 100.00 |
| LIABILITIES AND NET WORTH | | % of Total Liabilities and Net Worth |
| Loans and Notes Payable from Third Parties | \$ 653,107,505 | 24.91 |
| Loans and Notes Payable from Parent Companies, Affiliates, etc. | 350,116,645 | 13.35 |
| Bonds, Debentures, and Certificates of Indebtedness | 464,603,889 | 17.72 |
| Accounts Payable | 37,316,419 | 1.42 |
| Dealers' Reserves and Withholds | 1,094,419 | 0.04 |
| Accrued Taxes Other Than Income Tax | 2,956,919 | 0.11 |
| Reserve for Income Taxes | 21,206,315 | 0.81 |
| Credit Insurance Premiums Due Insurer | 332,981 | 0.01 |
| Other Liabilities and Accruals | 446,241,354 | 17.02 |
| Total Liabilities | 1,976,976,446 | 75.39 |
| Net Worth | 645,282,549 | 24.61 |
| Total Liabilities and Net Worth | \$ 2,622,258,995 | 100.00 |

Exhibit B California Finance Lenders Analysis of Loans and Receivables Outstanding For the Year Ended December 31, 2023 (\$ in thousands)

| CALIFORNIA FINANCE LENDERS LOAN RECEIVABLES | Aggregate Balance | % of Subtotal |
|---|--------------------------|------------------|
| Consumer Loans | \$ 50,588,836 | 20.92 |
| Commercial Loans | 191,214,245 | 79.08 |
| Subtotal | \$ 241,803,081 | 100.00 |
| Less: Unearned Pre-Computed Charges | 1,153,037 | |
| Allowance for Bad Debts | 4,678,683 | |
| Net California Finance Lenders Loan Receivables | \$ 235,971,361 | - |
| OTHER RECEIVABLES | | |
| Sales Contracts | \$ 449,046,967 | 33.77 |
| Leases (True Leases) | 121,634,561 | 9.15 |
| Factoring | 12,449,388 | 0.94 |
| Other | 746,568,988 | 56.15 |
| Subtotal | \$ 1,329,699,904 | 100.00 |
| Less: Unearned Pre-Computed Charges | 13,535,179 | |
| Allowance for Bad Debts | 25,992,526 | |
| Net California Finance Lenders Loan Receivables | \$ 1,290,172,199 | |

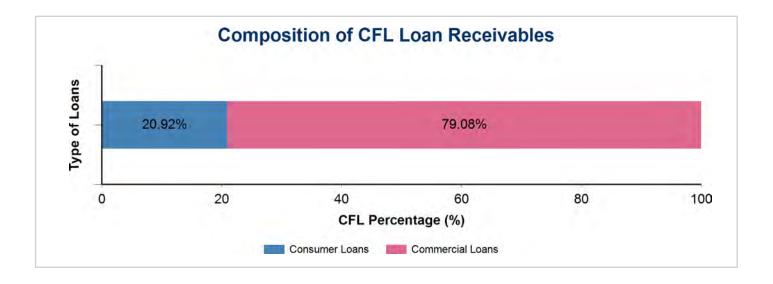


Exhibit C California Financing Law Licensees Statement of Income and Expenses For the Year Ended December 31, 2023 (\$ in thousands)

| INCOME | | | % of Total Income |
|--|----|-------------|-------------------------|
| Gross Income of California Financing Law Licensees from Loans Made and Brokered Loans | \$ | 23,841,387 | 5.59 |
| Gross Income from All Other Businesses and Sources | | 402,697,740 | 94.41 |
| Total Gross Income | \$ | 426,539,127 | 100.00 |
| EXPENSES | | | |
| Loss on Loans Receivable | \$ | 9,874,682 | 2.32 |
| Professional Audit and Accounting Services | | 995,335 | 0.23 |
| Insurance and Bond Premiums | | 597,795 | 0.14 |
| Legal Services and Expenses | | 1,328,164 | 0.31 |
| Occupancy Expenses | | 2,681,511 | 0.63 |
| Provision for Bad Debt Allowance | | 10,572,734 | 2.48 |
| Salaries and Bonuses: Employees | | 34,038,972 | 7.98 |
| Salaries and Bonuses: Owners, Partners, Executives | | 1,902,878 | 0.45 |
| Depreciation | | 19,808,272 | 4.64 |
| License Fees and Taxes | | 931,502 | 0.22 |
| Telephone and Utilities | | 638,121 | 0.15 |
| Advertising and Promotions | | 6,293,497 | 1.48 |
| Other Expenses | | 209,189,509 | 49.04 |
| Total Expenses Before Interest and Income Taxes | \$ | 298,852,972 | 70.06 |
| Income or Loss Before Interest and Income Taxes | \$ | 127,686,154 | 29.94 |
| Less: Interest Paid to Bona Fide Third Parties | | 48,645,839 | 11.40 |
| Interest Paid to Parent Company, Affiliates and Others | 5 | 21,250,060 | 4.98 |
| Income or Loss Before Income Taxes | \$ | 57,790,255 | 13.55 |
| Less: Provision for Income Taxes | | 5,373,839 | 1.26 |
| Net Income or (Loss) | \$ | 52,416,416 | 12.29 |

Exhibit D California Financing Law Licensees Analysis of Income Received For the Year Ended December 31, 2023 (\$ in thousands)

| CFL LOANS MADE AND CFL-BROKERED LOANS | | Loans Under \$2,500 | | Loans \$2,500 and Over | Total |
|--|--------|---------------------------|----|------------------------------|-------------------|
| CONSUMER LOANS | | | _ | | |
| Charges Earned on Loans | \$ | 115,608 | \$ | 3,694,029 | \$ 3,809,637 |
| Collection from Charged-Off Accounts | | 3,668 | | 34,203 | 37,871 |
| Income from Credit Insurance | | 32 | | 3,365 | 3,397 |
| Other Insurance Commissions | | 0 | | 4,917 | 4,917 |
| Administrative Fees | | 25,270 | | 224,360 | 249,630 |
| Commissions from Loan Brokering | | 10,482 | | 336,041 | 346,523 |
| Other Income | | 90,443 | | 1,314,391 | 1,404,834 |
| Income from Consumer Loans | \$ | 245,503 | \$ | 5,611,306 | \$ 5,856,809 |
| COMMERCIAL LOANS | | | | | |
| Charges Earned on Loans | | | | | \$ 16,473,180 |
| Collection from Charged-Off Accounts | | | | | 25,330 |
| Income from Credit Insurance | | | | | 571 |
| Other Insurance Commissions | | | | | 5,768 |
| Commissions from Loan Brokering | | | | | 162,416 |
| Other Income | | | | | 1,317,313 |
| Income from Commercial Loans | | | | | \$ 17,984,578 |
| Total Income from All Loans | | | | | \$ 23,841,387 |
| ALL OTHER BUSINESS AND SOURCES | | | | | |
| Charges Earned on Loans | | | | | \$ 156,016,593 |
| Other Interest or Return on Investments | | | | | 20,438,774 |
| Collection from Charged-Off Accounts | | | | | 3,855,832 |
| Income from Credit Insurance | | | | | 19,394 |
| Other Insurance Commissions | | | | | 1,011,123 |
| Other Income Relating to Loans | | | | | 221,356,023 |
| Total Income from All Other Business and S | Source | es | | | \$ 402,697,739 |

Exhibit E California Finance Lenders Loans Made or Refinanced by Size For the Year Ended December 31, 2023 (\$ in thousands)

| Size of Loans | Number of Loans | % of Total Number | Principal Amoun | | % of Total Amount |
|----------------------------------|--------------------|----------------------|-----------------|-------------|----------------------|
| CONSUMER LOANS | | | | | |
| \$ 499 or less | 38,257,123 | 95.85 | \$ | 3,874,418 | 7.81 |
| 500 to 1,999 | 780,373 | 1.96 | | 592,626 | 1.19 |
| 2,000 to 2,499 | 17,360 | 0.04 | | 37,165 | 0.07 |
| 2,500 to 4,999 | 165,174 | 0.41 | | 548,392 | 1.10 |
| 5,000 to 9,999 | 157,989 | 0.40 | | 1,092,816 | 2.20 |
| 10,000 or more | 537,566 | 1.35 | | 43,490,926 | 87.62 |
| Total Consumer Loans Made | 39,915,585 | 100.00 | \$ | 49,636,344 | 100.00 |
| COMMERCIAL LOANS | | | | | |
| \$5,000 or more | 805,319 | 100.00 | \$ | 154,467,096 | 100.00 |
| Total Commercial Loans Made | 805,319 | 100.00 | \$ | 154,467,096 | 100.00 |
| Total Loans Made, All Categories | 40,720,904 | | \$ | 204,103,440 | |

Consumer Loans Made or Refinanced by Principal Amount

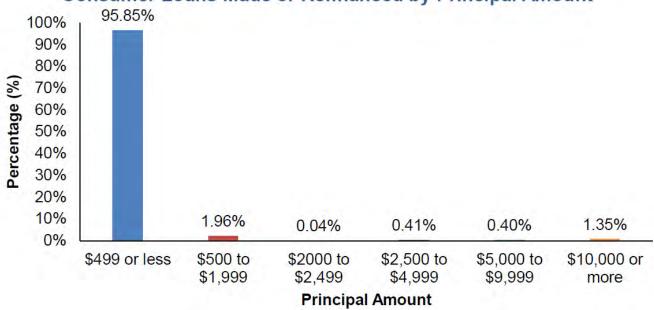
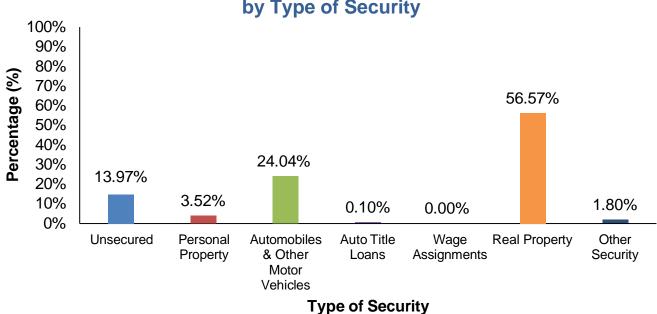


Exhibit F California Finance Lenders Loans Made or Refinanced by Type of Security For the Year Ended December 31, 2023 (\$ in thousands)

| Type of Security | Number of Loans | % of Total Number | _ | Principal Amount | % of Total Amount |
|---|--|---|-----|---|--|
| CONSUMER LOANS | | | | | |
| LOANS UNDER \$2,500 | | | | | |
| Unsecured Personal Property Automobiles & Other Motor Vehicles Auto Title Loans Wage Assignments Other Security | 39,002,014 351 28 68 0 52,395 | 99.86 0.00 0.00 0.00 0.00 0.13 | \$ | 4,472,785 434 50 78 0 30,862 | 99.30 0.01 0.00 0.00 0.00 0.69 |
| Total Loans Made | 39,054,856 | 100.00 | \$ | 4,504,209 | 100.00 |
| LOANS OF \$2,500 TO \$4,999 | | | | | |
| Unsecured Personal Property Automobiles & Other Motor Vehicles Auto Title Loans Wage Assignments Other Security | 145,282 368 8,435 4,874 0 <u>6,215</u> | 87.96 0.22 5.11 2.95 0.00 <u>3.76</u> | \$ | 476,661 1,337 31,097 16,306 0 22,992 | 86.92 0.24 5.67 2.97 0.00 4.19 |
| Total Loans Made | 165,174 | 100.00 | \$ | 548,393 | 100.00 |
| LOANS OF \$5,000 TO \$9,999 | | | | | |
| Unsecured Personal Property Automobiles & Other Motor Vehicles Auto Title Loans Wage Assignments Real Property Other Security | 132,725 470 21,080 3,545 0 85 <u>85</u> | 84.01 0.30 13.34 2.24 0.00 0.05 <u>0.05</u> | \$ | 907,789 3,292 156,904 23,540 0 673 <u>617</u> | 83.07 0.30 14.36 2.15 0.00 0.06 0.06 |
| Total Loans Made | 157,989 | 100.00 | \$ | 1,092,815 | 100.00 |
| LOANS OF \$10,000 AND MORE | | | | | |
| Unsecured Personal Property Automobiles & Other Motor Vehicles Auto Title Loans Wage Assignments Real Property Other Security | 52,380 45,648 367,851 582 1 63,625 7,479 | 9.74 8.49 68.43 0.11 0.00 11.84 1.39 | \$ | 1,074,623 1,739,824 11,745,823 10,563 544 28,078,470 <u>841,079</u> | 2.47 4.00 27.01 0.02 0.00 64.56 1.93 |
| Total Loans Made | 537,566 | 100.00 | \$ | 43,490,926 | 100.00 |
| Total Consumer Loans Made | 39,915,585 | | \$_ | 49,636,343 | |

| Type of Security | Number of Loans | % of Total Number | Principal Amount | % of Total Amount |
|------------------------------------|--------------------|----------------------|-------------------------|----------------------|
| ALL CONSUMER LOANS | | | | |
| Unsecured | 39,332,401 | 98.54 | \$ 6,931,858 | 13.97 |
| Personal Property | 46,837 | 0.12 | 1,744,887 | 3.52 |
| Automobiles & Other Motor Vehicles | 397,394 | 1.00 | 11,933,874 | 24.04 |
| Auto Title Loans | 9,069 | 0.02 | 50,487 | 0.10 |
| Wage Assignments | 1 | 0.00 | 544 | 0.00 |
| Real Property | 63,710 | 0.16 | 28,079,143 | 56.57 |
| Other Security | 66,173 | 0.17 | 895,550 | 1.80 |
| Total Consumer Loans Made | 39,915,585 | 100.00 | \$ 49,636,343 | 100.00 |

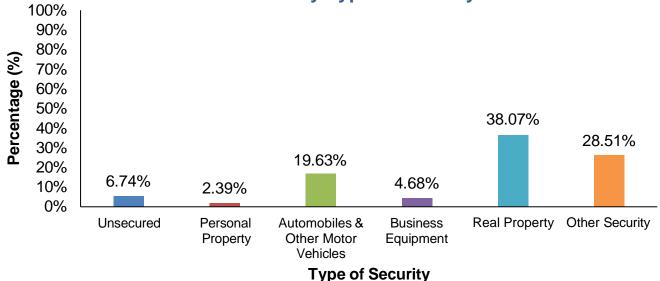


Principal Amount of Consumer Loans Made or Refinanced

by Type of Security

| Type of Security | Number of Loans | % of Total Number | Principal Amount | | % of Total Amount |
|---|---|--|---------------------|--|--|
| COMMERCIAL LOANS | | | | | |
| Unsecured Personal Property Automobiles & Other Motor Vehicles Business Equipment Real Property Other Security | 155,593 23,102 489,245 23,458 23,192 <u>90,729</u> | 19.32 2.87 60.75 2.91 2.88 <u>11.27</u> | \$ | 10,409,836 3,684,268 30,315,295 7,223,489 58,799,017 44,035,191 | 6.74 2.39 19.63 4.68 38.07 <u>28.51</u> |
| Total Commercial Loans Made | 805,319 | 100.00 | _\$ | 154,467,096 | 100.00 |
| Total Loans Made, All Categories | 40,720,904 | | \$ | 204,103,439 | |





| Rate Charged | Number of Loans | % of Total Number | _ | Principal Amount | % of Total Amount |
|---|---|---|----|---|--|
| CONSUMER LOANS | | | | | |
| LOANS UNDER \$2,500 | | | | | |
| Step Rate: 2.5, 2, 1.5, 1% per month | 915 | | \$ | 1,179 | |
| Alternate Rate: 1.6% per month Federal Reserve Bank Rate plus 10% | 38 0 | | | 56 0 | |
| Other Rates:Up to 14.999APR15.000 to 19.999APR20.000 to 24.999APR25.000 to 29.999APR30.000 to 34.999APR35.000 to 39.999APR40.000 to 69.999APR70.000 to 99.999APR100.000 or MoreAPRVariable Rate | 37,870,783 11,119 90,791 3,472 1,030,494 45,921 831 1,356 50 <u>39</u> | 96.97 0.03 0.23 0.01 2.64 0.12 0.00 0.00 0.00 0.00 | \$ | 4,196,553 17,211 49,254 3,895 179,846 55,528 1,002 852 49 20 | 93.17 0.38 1.09 0.09 3.99 1.23 0.02 0.02 0.02 0.00 0.00 |
| Total Loans Made | 39,054,856 | 100.00 | \$ | 4,504,210 | 100.00 |
| LOANS OF \$2,500 TO \$4,999 | | | | | |
| Up to 14.999APR15.000 to 19.999APR20.000 to 24.999APR25.000 to 29.999APR30.000 to 34.999APR35.000 to 39.999APR40.000 to 69.999APR70.000 to 99.999APR100.000 or MoreAPRVariable Rate | 3,626 17,620 2,422 4,608 22,967 103,761 10,149 1 2 18 | 2.20 10.67 1.47 2.79 13.90 62.82 6.14 0.00 0.00 0.00 | \$ | 12,766 60,095 8,946 16,653 70,303 344,909 34,642 3 6 69 | $\begin{array}{r} 2.33 \\ 10.96 \\ 1.63 \\ 3.04 \\ 12.82 \\ 62.89 \\ 6.32 \\ 0.00 \\ 0.00 \\ 0.01 \end{array}$ |
| Total Loans Made | 165,174 | 100.00 | \$ | 548,392 | 100.00 |

| Rate Charged | Number of Loans | % of Total Number | Principal Amount | % of Total Amount |
|--|--|---|--|---|
| CONSUMER LOANS | | | | |
| LOANS OF \$5,000 TO \$9,999 | | | | |
| Up to 14.999APR15.000 to 19.999APR20.000 to 24.999APR25.000 to 29.999APR30.000 to 34.999APR35.000 to 39.999APR40.000 to 69.999APR70.000 to 99.999APR100.000 or MoreAPR | 2,772 4,850 5,308 4,337 11,973 122,282 6,461 2 1 | 1.75 3.07 3.36 2.75 7.58 77.40 4.09 0.00 0.00 | \$ 18,745 35,182 37,624 31,564 87,635 841,112 40,917 11 7 | 1.72 3.22 3.44 2.89 8.02 76.97 3.74 0.00 0.00 |
| Variable Rate | 3 | 0.00 | 18 | 0.00 |
| Total Loans Made | 157,989 | 100.00 | \$ 1,092,815 | 100.00 |
| LOANS OF \$10,000 AND MORE | | | | |
| Up to 14.999 APR 15.000 to 19.999 APR 20.000 to 24.999 APR 25.000 to 29.999 APR 30.000 to 34.999 APR 35.000 to 39.999 APR 40.000 to 69.999 APR 70.000 to 99.999 APR 100.000 or More APR Variable Rate | 443,207 14,912 9,558 7,129 28,038 29,079 521 156 91 4,875 | 82.45 2.77 1.78 1.33 5.22 5.41 0.10 0.03 0.02 0.91 | \$ 39,915,336 359,349 160,199 117,575 356,007 366,420 6,207 1,937 38,061 2,169,836 | 91.78 0.83 0.37 0.27 0.82 0.84 0.01 0.00 0.09 4.99 |
| Total Loans Made | 537,566 | 100.00 | \$ 43,490,927 | 100.00 |
| Total Consumer Loans Made | 39,915,585 | | \$ 49,636,344 | |

| Rate Charged | Number of Loans | % of Total Number | _ | Principal Amount | % of Total Amount |
|--|---|---|----|---|---|
| COMMERCIAL LOANS | | | | | |
| Up to 14.999APR15.000 to 19.999APR20.000 to 24.999APR25.000 to 29.999APR30.000 to 34.999APR35.000 to 39.999APR40.000 to 69.999APR70.000 to 99.999APR100.000 or MoreAPR | 566,588 47,015 6,141 7,328 7,592 3,786 14,177 6,336 4,669 | 70.36 5.84 0.76 0.91 0.94 0.47 1.76 0.79 0.58 | \$ | 105,994,738 3,805,187 891,842 373,216 299,539 194,611 825,756 321,287 1,677,240 | 68.62 2.46 0.58 0.24 0.19 0.13 0.53 0.21 1.09 |
| Variable Rate | 141,687 | 17.59 | | 40,083,681 | 25.95 |
| Total Commercial Loans Made | 805,319 | 100.00 | \$ | 154,467,097 | 100.00 |
| Total Loans Made, All Categories | 40,720,904 | | \$ | 204,103,440 | |

| Rate Charged | Number of Loans | % of Total Number | _ | Principal Amount | % of Total Amount |
|---|--|---|----|---|---|
| CONSUMER LOANS - UNSECURED | | | | | |
| LOANS UNDER \$2,500 | | | | | |
| Step Rate: 2.5, 2, 1.5, 1% per month | 915 | | \$ | 1,179 | |
| Alternate Rate: 1.6% per month Federal Reserve Bank Rate plus 10% | 34 0 | | | 48 0 | |
| Other Rates:Up to 14.999APR15.000 to 19.999APR20.000 to 24.999APR25.000 to 29.999APR30.000 to 34.999APR35.000 to 39.999APR40.000 to 69.999APR70.000 to 99.999APR100.000 or MoreAPRVariable Rate | 37,883,814 7,602 68,793 3,465 1,030,493 45,919 831 1,356 1 | 97.03 0.02 0.18 0.01 2.64 0.12 0.00 0.00 0.00 0.00 | \$ | 4,191,981 11,627 30,518 3,884 179,845 55,524 1,002 852 2 0 | 93.67 0.26 0.68 0.09 4.02 1.24 0.02 0.02 0.00 0.00 |
| Total Loans Made | 39,042,274 | 100.00 | \$ | 4,475,235 | 100.00 |
| LOANS OF \$2,500 TO \$4,999 | | | | | |
| Up to 14.999APR15.000 to 19.999APR20.000 to 24.999APR25.000 to 29.999APR30.000 to 34.999APR35.000 to 39.999APR40.000 to 69.999APR70.000 to 99.999APR100.000 or MoreAPRVariable Rate | 2,523 14,861 1,889 1,406 21,305 97,626 5,671 0 1 | 1.74 10.23 1.30 0.97 14.66 67.20 3.90 0.00 0.00 0.00 | \$ | 8,632 49,831 6,947 4,861 64,189 322,448 19,750 0 3 0 | 1.81 10.45 1.46 1.02 13.47 67.65 4.14 0.00 0.00 0.00 |
| Total Loans Made | 145,282 | 100.00 | \$ | 476,661 | 100.00 |

| Rate Charged | Number of Loans | % of Total Number | _ | Principal Amount | % of Total Amount |
|--|---|---|----|--|---|
| CONSUMER LOANS - UNSECURED | | | | | |
| LOANS OF \$5,000 TO \$9,999 | | | | | |
| Up to 14.999 APR 15.000 to 19.999 APR 20.000 to 24.999 APR 25.000 to 29.999 APR 30.000 to 34.999 APR 35.000 to 39.999 APR 40.000 to 69.999 APR 70.000 to 99.999 APR 100.000 or More APR | 2,392 4,025 3,385 1,324 5,683 112,187 3,728 0 1 | 1.80 3.03 2.55 1.00 4.28 84.53 2.81 0.00 0.00 | \$ | 15,729 28,760 22,752 8,897 40,097 768,493 23,052 0 7 | 1.73 3.17 2.51 0.98 4.42 84.66 2.54 0.00 0.00 |
| Variable Rate | 0 | 0.00 | | 0 | 0.00 |
| Total Loans Made | 132,725 | 100.00 | \$ | 907,787 | 100.00 |
| LOANS OF \$10,000 AND MORE | | | | | |
| Up to 14.999 APR 15.000 to 19.999 APR 20.000 to 24.999 APR 25.000 to 29.999 APR 30.000 to 34.999 APR 35.000 to 39.999 APR 40.000 to 69.999 APR 70.000 to 99.999 APR 100.000 or More APR Variable Rate | 7,470 2,136 2,738 1,128 17,186 21,198 331 92 0 101 | 14.26 4.08 5.23 2.15 32.81 40.47 0.63 0.18 0.00 0.19 | \$ | 525,921 31,816 34,738 17,045 188,064 258,805 3,601 942 0 13,691 | 48.94 2.96 3.23 1.59 17.50 24.08 0.34 0.09 0.00 1.27 |
| Total Loans Made | 52,380 | 100.00 | \$ | 1,074,623 | 100.00 |
| Total Unsecured Consumer Loans Made | 39,372,661 | | \$ | 6,934,306 | |

| CONSUMER LOANS - PERSONAL PROPERTY (HOUSEHOLD ITEMS) LOANS UNDER \$2.500 Step Rate: 2.5, 2, 1.5, 1% per month 0 \$ 0 Alternate Rate: 1.6% per month 0 0 0 Federal Reserve Bank Rate plus 10% 0 0 0 Other Rates: Up to 14.999 APR 66 18.80 \$ 6 1.38 15.000 to 19.999 APR 0 0.00 0 0.00 0.000 25.000 to 29.999 APR 0 0.00 0 0.00 0.000 35.000 to 19.999 APR 0 0.00 0 0.00 0.000 | | Number of Loans | % of Total Number | _ | Principal Amount | % of Total Amount |
|--|---|--|--|----|---|---|
| Step Rate: 2.5, 2, 1.5, 1% per month 0 \$ 0 Alternate Rate: 1.6% per month 0 0 0 Federal Reserve Bank Rate plus 10% 0 0 0 Other Rates: 0 0.00 0 0.00 Up to 14.999 APR 66 18.80 \$ 6 1.38 15.000 to 19.999 APR 0 0.00 0 0.00 20.000 to 24.999 APR 260 74.07 428 98.39 25.000 to 29.999 APR 0 0.00 0 0.00 35.000 to 39.999 APR 0 0.00 0 0.00 35.000 to 39.999 APR 0 0.00 0 0.00 100.000 to 69.999 APR 0 0.00 0 0.00 100.00 or More APR 0 0.00 0 0.00 0 0.00 Lyp to 14.999 APR 239 64.95 830 62.08 25.000 to 29.999 APR | | Y (HOUSEHOLD I | <u>IEMS)</u> | | | |
| 2.5, 2, 1.5, 1% per month 0 \$ 0 Alternate Rate: 1.6% per month 0 0 Federal Reserve Bank Rate plus 10% 0 0 Other Rates: Up to 14.999 APR 66 18.80 \$ 6 1.38 15.000 to 19.999 APR 260 74.07 428 98.39 25.000 to 24.999 APR 0 0.00 0.000 30.000 to 34.999 APR 0 0.00 0.000 30.000 to 34.999 APR 0 0.00 0.000 428 98.39 25.000 to 29.999 APR 0 0.00 0.000 30.000 to 34.999 APR 0 0.00 0.000 0.000 40.000 to 69.999 APR 0 0.00 0.000 0.000 40.000 to 69.999 APR 0 0.00 0.000 0.000 100.000 or More APR 0 0.000 0 0.000 0.000 Variable Rate 25 7.12 1 0.23 100.00 \$ 435 100.00 < | LOANS UNDER \$2,500 | | | | | |
| 1.6% per month 0 0 Federal Reserve Bank Rate plus 10% 0 0 Other Rates: Up to 14.999 APR 66 18.80 \$ 6 1.38 15.000 to 19.999 APR 0 0.00 0 0.00 20.000 to 24.999 APR 260 74.07 428 98.39 25.000 to 29.999 APR 0 0.00 0 0.00 35.000 to 39.999 APR 0 0.00 0 0.00 40.000 to 69.999 APR 0 0.00 0 0.00 40.000 to 69.999 APR 0 0.00 0 0.00 40.000 to 69.999 APR 0 0.00 0 0.00 70.000 to 99.999 APR 0 0.00 0 0.00 0 0.00 100.000 or More APR 0 0.00 \$ 435 100.00 \$ 435 100.00 LOANS OF \$2.500 TO \$4.999 PR 4 1.09 \$ 15 1.12 15.000 to 24.999 APR 0 0.00 0 | | 0 | | \$ | 0 | |
| Up to 14.999 APR 66 18.80 \$ 6 1.38 15.000 to 19.999 APR 0 0.00 0 0.00 20.000 to 24.999 APR 260 74.07 428 98.39 25.000 to 29.999 APR 0 0.00 0 0.00 30.000 to 34.999 APR 0 0.00 0 0.00 40.000 to 69.999 APR 0 0.00 0 0.00 40.000 to 69.999 APR 0 0.00 0 0.00 70.000 to 99.999 APR 0 0.00 0 0.00 100.000 or More APR 0 0.00 0 0.00 Variable Rate 25 7.12 1 0.23 Total Loans Made 351 100.00 \$ 435 100.00 LOANS OF \$2.500 TO \$4.999 PR 4 1.09 \$ 15 1.12 15.000 to 19.999 APR 0 0.00 0 0.00 0 0.00 20.000 to 24.999 APR 9 2.45 <td>1.6% per month</td> <td></td> <td></td> <td></td> <td></td> <td></td> | 1.6% per month | | | | | |
| LOANS OF \$2,500 TO \$4,999 Up to 14.999 APR 4 1.09 \$ 15 1.12 15.000 to 19.999 APR 0 0.00 0 0.00 20.000 to 24.999 APR 239 64.95 830 62.08 25.000 to 29.999 APR 0 0.00 0 0.00 30.000 to 34.999 APR 9 2.45 39 2.92 35.000 to 39.999 APR 116 31.52 453 33.88 40.000 to 69.999 APR 0 0.00 0 0.00 70.000 to 99.999 APR 0 0.00 0 0.00 Variable Rate 0 0.00 0 0.00 0 0.00 | Up to 14.999APR15.000 to 19.999APR20.000 to 24.999APR25.000 to 29.999APR30.000 to 34.999APR35.000 to 39.999APR40.000 to 69.999APR70.000 to 99.999APR100.000 or MoreAPR | 0 260 0 0 0 0 0 0 | $\begin{array}{c} 0.00 \\ 74.07 \\ 0.00 \\ 0.00 \\ 0.00 \\ 0.00 \\ 0.00 \\ 0.00 \\ 0.00 \end{array}$ | \$ | 0 428 0 0 0 0 0 | $\begin{array}{c} 0.00\\ 98.39\\ 0.00\\ 0.00\\ 0.00\\ 0.00\\ 0.00\\ 0.00\\ 0.00\\ 0.00\end{array}$ |
| Up to 14.999APR41.09\$151.1215.000 to 19.999APR00.0000.0020.000 to 24.999APR23964.9583062.0825.000 to 29.999APR00.0000.0030.000 to 34.999APR92.45392.9235.000 to 39.999APR11631.5245333.8840.000 to 69.999APR00.0000.0070.000 to 99.999APR00.0000.00100.000 or MoreAPR00.0000.00Variable Rate00.0000.0000.00 | Total Loans Made | 351 | 100.00 | \$ | 435 | 100.00 |
| 15.000 to 19.999 APR00.0000.0020.000 to 24.999 APR23964.9583062.0825.000 to 29.999 APR00.0000.0030.000 to 34.999 APR92.45392.9235.000 to 39.999 APR11631.5245333.8840.000 to 69.999 APR00.0000.0070.000 to 99.999 APR00.0000.00100.000 or More APR00.0000.00Variable Rate00.0000.00 | LOANS OF \$2,500 TO \$4,999 | | | | | |
| Total Loans Made 368 100.00 \$ 1.337 100.00 | 15.000 to 19.999 APR 20.000 to 24.999 APR 25.000 to 29.999 APR 30.000 to 34.999 APR 35.000 to 39.999 APR 40.000 to 69.999 APR 70.000 to 99.999 APR 100.000 or More APR | 0 239 0 9 116 0 0 0 | $\begin{array}{c} 0.00 \\ 64.95 \\ 0.00 \\ 2.45 \\ 31.52 \\ 0.00 \\ 0.00 \\ 0.00 \end{array}$ | \$ | 0 830 0 39 453 0 0 0 | $\begin{array}{c} 0.00 \\ 62.08 \\ 0.00 \\ 2.92 \\ 33.88 \\ 0.00 \\ 0.00 \\ 0.00 \\ 0.00 \end{array}$ |
| | Total Loans Made | 368 | 100.00 | \$ | 1,337 | 100.00 |

| Rate Charged | Number of Loans | % of Total Number | _ | Principal Amount | % of Total Amount |
|--|---|---|--------|--|---|
| CONSUMER LOANS - PERSONAL PROPER | TY (HOUSEHOLD I | TEMS) | | | |
| LOANS OF \$5,000 TO \$9,999 | | | | | |
| Up to 14.999APR15.000 to 19.999APR20.000 to 24.999APR25.000 to 29.999APR30.000 to 34.999APR35.000 to 39.999APR40.000 to 69.999APR70.000 to 99.999APR100.000 or MoreAPR | 2 0 162 1 44 258 0 0 0 | $\begin{array}{c} 0.43 \\ 0.00 \\ 34.69 \\ 0.21 \\ 9.42 \\ 55.25 \\ 0.00 \\ 0.00 \\ 0.00 \\ 0.00 \end{array}$ | \$ | 10 0 1,204 7 302 1,751 0 0 0 | $\begin{array}{c} 0.30\\ 0.00\\ 36.57\\ 0.21\\ 9.17\\ 53.19\\ 0.00\\ 0.00\\ 0.00\\ 0.00\end{array}$ |
| Variable Rate | 3 | 0.64 | | 18 | 0.55 |
| Total Loans Made | 467 | 100.00 | \$ | 3,292 | 100.00 |
| Up to 14.999 APR 15.000 to 19.999 APR 20.000 to 24.999 APR 25.000 to 29.999 APR 30.000 to 34.999 APR 35.000 to 39.999 APR 40.000 to 69.999 APR 70.000 to 99.999 APR 100.000 or More APR Variable Rate Total Loans Made | 42,310 3,024 137 0 3 6 0 0 0 0 0 168 45,648 | 92.69 6.62 0.30 0.00 0.01 0.01 0.00 0.00 0.00 0.37 100.00 | \$ | 1,629,877 67,847 1,983 0 32 69 0 0 0 0 40,016 1,739,824 | 93.68 3.90 0.11 0.00 0.00 0.00 0.00 0.00 2.30 100.00 |
| Total Personal Property Consumer Loans Made | 46,834 | | \$ | 1,744,888 | |

| Rate Charged | Number of Loans | % of Total Number | _ | Principal Amount | % of Total Amount |
|---|---|--|----|--|--|
| CONSUMER LOANS - AUTOMOBILES AND | OTHER MOTOR VE | HICLES | | | |
| LOANS UNDER \$2,500 | | | | | |
| Step Rate: 2.5, 2, 1.5, 1% per month | 0 | | \$ | 0 | |
| Alternate Rate: 1.6% per month Federal Reserve Bank Rate plus 10% | 0 0 | | | 0 0 | |
| Other Rates: Up to 14.999 APR 15.000 to 19.999 APR 20.000 to 24.999 APR 25.000 to 29.999 APR 30.000 to 34.999 APR 35.000 to 39.999 APR 40.000 to 69.999 APR 70.000 to 99.999 APR 100.000 or More APR Variable Rate Total Loans Made | 0 6 17 5 0 0 0 0 0 0 0 0 28 | 0.00 21.43 60.71 17.86 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0 | \$ | 0 9 31 10 0 0 0 0 0 0 50 | 0.00 18.00 62.00 20.00 0.00 0.00 0.00 0.00 0.00 |
| LOANS OF \$2,500 TO \$4,999 Up to 14.999 APR 15.000 to 19.999 APR 20.000 to 24.999 APR 25.000 to 29.999 APR 30.000 to 34.999 APR 35.000 to 39.999 APR 40.000 to 69.999 APR 70.000 to 99.999 APR 100.000 or More APR Variable Rate Variable Rate | 17 78 211 792 1,643 5,694 0 0 0 0 | 0.20 0.92 2.50 9.39 19.48 67.50 0.00 0.00 0.00 0.00 | \$ | 73 312 853 2,969 6,038 20,852 0 0 0 0 | 0.23 1.00 2.74 9.55 19.42 67.05 0.00 0.00 0.00 0.00 |
| Total Loans Made | 8,435 | 100.00 | \$ | 31,097 | 100.00 |

| Rate Charged | Number of Loans | % of Total Number | _ | Principal Amount | % of Total Amount |
|--|---|---|----|--|---|
| CONSUMER LOANS - AUTOMOBILES AND | OTHER MOTOR VE | HICLES | | | |
| LOANS OF \$5,000 TO \$9,999 | | | | | |
| Up to 14.999 APR 15.000 to 19.999 APR 20.000 to 24.999 APR 25.000 to 29.999 APR 30.000 to 34.999 APR 35.000 to 39.999 APR 40.000 to 69.999 APR 70.000 to 99.999 APR 100.000 or More APR | 247 812 1,728 2,985 6,223 9,084 1 0 0 | $\begin{array}{c} 1.17\\ 3.85\\ 8.20\\ 14.16\\ 29.52\\ 43.09\\ 0.00\\ 0.$ | \$ | 1,983 6,320 13,437 22,479 47,076 65,601 7 0 0 | 1.26 4.03 8.56 14.33 30.00 41.81 0.00 0.00 0.00 |
| Variable Rate | 0 | 0.00 | | 0 | 0.00 |
| Total Loans Made | 21,080 | 100.00 | \$ | 156,903 | 100.00 |
| LOANS OF \$10,000 AND MORE | | | | | |
| Up to 14.999 APR 15.000 to 19.999 APR 20.000 to 24.999 APR 25.000 to 29.999 APR 30.000 to 34.999 APR 35.000 to 39.999 APR 40.000 to 69.999 APR 70.000 to 99.999 APR 100.000 or More APR Variable Rate Total Loans Made | 327,592 9,198 6,656 5,951 10,811 7,643 0 0 0 0 0 0 0 0 | 89.06 2.50 1.81 1.62 2.94 2.08 0.00 0.00 0.00 0.00 0.00 0.00 | \$ | 11,059,686 196,355 122,729 97,008 165,837 104,209 0 0 0 0 0 0 | 94.16 1.67 1.04 0.83 1.41 0.89 0.00 0.00 0.00 0.00 0.00 0.00 |
| Total Automobiles & Other Motor Vehicles Consumer Loans Made | 397,394 | | \$ | 11,933,874 | |

| Rate Charged | Number of Loans | % of Total Number | _ | Principal Amount | % of Total Amount |
|---|---|---|-----|---|--|
| CONSUMER LOANS - AUTO TITLE LOANS | | | | | |
| LOANS UNDER \$2,500 | | | | | |
| Step Rate: 2.5, 2, 1.5, 1% per month | 0 | | \$ | 0 | |
| Alternate Rate: 1.6% per month Federal Reserve Bank Rate plus 10% | 4 0 | | | 8 0 | |
| Other Rates:Up to 14.999APR15.000 to 19.999APR20.000 to 24.999APR25.000 to 29.999APR30.000 to 34.999APR35.000 to 39.999APR40.000 to 69.999APR70.000 to 99.999APR100.000 or MoreAPRVariable Rate | 1 5 10 0 1 2 0 0 49 0 | $\begin{array}{r} 1.47 \\ 7.35 \\ 14.71 \\ 0.00 \\ 1.47 \\ 2.94 \\ 0.00 \\ 0.00 \\ 72.06 \\ 0.00 \end{array}$ | \$ | 1 10 15 0 2 4 0 0 47 0 | $\begin{array}{r} 1.27 \\ 12.66 \\ 18.99 \\ 0.00 \\ 2.53 \\ 5.06 \\ 0.00 \\ 0.00 \\ 59.49 \\ 0.00 \end{array}$ |
| Total Loans Made | 68 | 100.00 | _\$ | 79 | 100.00 |
| LOANS OF \$2,500 TO \$4,999 | | | | | |
| Up to 14.999APR15.000 to 19.999APR20.000 to 24.999APR25.000 to 29.999APR30.000 to 34.999APR35.000 to 39.999APR40.000 to 69.999APR70.000 to 99.999APR100.000 or MoreAPRVariable Rate | 4 19 40 3 10 318 4,478 1 1 0 | 0.08 0.39 0.82 0.06 0.21 6.52 91.88 0.02 0.02 0.02 0.00 | \$ | 15 66 149 12 37 1,130 14,892 3 3 0 | 0.09 0.40 0.91 0.07 0.23 6.93 91.32 0.02 0.02 0.02 0.00 |
| Total Loans Made | 4,874 | 100.00 | \$ | 16,307 | 100.00 |

| Rate Charged | Number of Loans | % of Total Number | Principal Amount | % of Total Amount |
|--|--|---|--|--|
| CONSUMER LOANS - AUTO TITLE LOANS | | | | |
| LOANS OF \$5,000 TO \$9,999 | | | | |
| Up to 14.999APR15.000 to 19.999APR20.000 to 24.999APR25.000 to 29.999APR30.000 to 34.999APR35.000 to 39.999APR40.000 to 69.999APR70.000 to 99.999APR100.000 or MoreAPR | 11 8 25 13 18 736 2,732 2 0 | 0.31 0.23 0.71 0.37 0.51 20.76 77.07 0.06 0.00 | \$ 87 63 172 81 117 5,151 17,857 11 0 | 0.37 0.27 0.73 0.34 0.50 21.88 75.86 0.05 0.00 |
| Variable Rate | 0 | 0.00 | 0 | 0.00 |
| Total Loans Made | 3,545 | 100.00 | \$ 23,539 | 100.00 |
| LOANS OF \$10,000 AND MORE | | | | |
| Up to 14.999 APR 15.000 to 19.999 APR 20.000 to 24.999 APR 25.000 to 29.999 APR 30.000 to 34.999 APR 35.000 to 39.999 APR 40.000 to 69.999 APR 70.000 to 99.999 APR 100.000 or More APR Variable Rate | 22 37 11 9 12 209 190 64 28 0 | 3.78 6.36 1.89 1.55 2.06 35.91 32.65 11.00 4.81 0.00 | \$ 1,319 1,651 270 159 156 2,982 2,606 995 427 0 | 12.48 15.63 2.56 1.50 1.48 28.23 24.67 9.42 4.04 0.00 |
| | | | | 0.00 |
| Total Loans Made | 582 | 100.00 | \$ 10,565 | 100.00 |
| Total Auto Title Consumer Loans Made | 9,069 | | \$ <u>50,490</u> | |

| Rate Charged | Number of Loans | % of Total Number | _ | Principal Amount | % of Total Amount |
|---|---|---|----|--|---|
| CONSUMER LOANS - WAGE ASSIGNMENT | | | | | |
| LOANS UNDER \$2,500 | | | | | |
| Step Rate: 2.5, 2, 1.5, 1% per month | 0 | | \$ | 0 | |
| Alternate Rate: 1.6% per month Federal Reserve Bank Rate plus 10% | 0 0 | | | 0 0 | |
| Other Rates: Up to 14.999 APR 15.000 to 19.999 APR 20.000 to 24.999 APR 25.000 to 29.999 APR 30.000 to 34.999 APR 35.000 to 39.999 APR 40.000 to 69.999 APR 70.000 to 99.999 APR 100.000 or More APR Variable Rate | 0 0 0 0 0 0 0 0 0 0 0 0 | 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0 | \$ | 0 0 0 0 0 0 0 0 0 0 0 0 | 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0 |
| LOANS OF \$2,500 TO \$4,999 Up to 14.999 APR 15.000 to 19.999 APR 20.000 to 24.999 APR 25.000 to 29.999 APR 30.000 to 34.999 APR 35.000 to 39.999 APR 40.000 to 69.999 APR 70.000 to 99.999 APR 100.000 or More APR Variable Rate Variable Rate | 0 0 0 0 0 0 0 0 0 0 0 0 0 | 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0 | \$ | 0 0 0 0 0 0 0 0 0 0 0 0 | 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0 |
| Total Loans Made | 0 | 0.00 | \$ | 0 | 0.00 |

| Rate Charged | Number of Loans | % of Total Number | | Principal Amount | % of Total Amount |
|--|--|--|-----|---|--|
| CONSUMER LOANS - WAGE ASSIGNMENT | | | | | |
| LOANS OF \$5,000 TO \$9,999 | | | | | |
| Up to 14.999APR15.000 to 19.999APR20.000 to 24.999APR25.000 to 29.999APR30.000 to 34.999APR35.000 to 39.999APR40.000 to 69.999APR70.000 to 99.999APR100.000 or MoreAPR | 0 0 0 0 0 0 0 0 0 0 | 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 | \$ | 0 0 0 0 0 0 0 0 0 0 | 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00 |
| Variable Rate | 0 | 0.00 | | 0 | 0.00 |
| Total Loans Made | 0 | 0.00 | \$ | 0 | 0.00 |
| LOANS OF \$10,000 AND MORE | | | | | |
| Up to 14.999 APR 15.000 to 19.999 APR 20.000 to 24.999 APR 25.000 to 29.999 APR 30.000 to 34.999 APR 35.000 to 39.999 APR 40.000 to 69.999 APR 70.000 to 99.999 APR 100.000 or More APR Variable Rate Total Loans Made | 1 0 0 0 0 0 0 0 0 0 0 0 | 100.00 0.00 0.00 0.00 0.00 0.00 0.00 0. | \$ | 544 0 0 0 0 0 0 0 0 0 0 0 0 | 100.00 0.00 0.00 0.00 0.00 0.00 0.00 0. |
| Total Wage Assignment Consumer Loans Made | 1 | | _\$ | 544 | |

| Rate Charged | Number of Loans | % of Total Number | _ | Principal Amount | % of Total Amount |
|--|---|--|----|--|---|
| CONSUMER LOANS - REAL PROPERTY | | | | | |
| LOANS OF \$5,000 TO \$9,999 | | | | | |
| Up to 14.999APR15.000 to 19.999APR20.000 to 24.999APR25.000 to 29.999APR30.000 to 34.999APR35.000 to 39.999APR40.000 to 69.999APR70.000 to 99.999APR100.000 or MoreAPR | 82 0 3 0 0 0 0 0 0 | $\begin{array}{c} 96.47 \\ 0.00 \\ 0.00 \\ 3.53 \\ 0.00 \\ 0.00 \\ 0.00 \\ 0.00 \\ 0.00 \\ 0.00 \end{array}$ | \$ | 657 0 0 17 0 0 0 0 0 0 | 97.48 0.00 0.00 2.52 0.00 0.00 0.00 0.00 0.00 |
| Variable Rate | 0 | 0.00 | | 0 | 0.00 |
| Total Loans Made | 85 | 100.00 | \$ | 674 | 100.00 |
| LOANS OF \$10,000 AND MORE | | | | | |
| Up to 14.999 APR 15.000 to 19.999 APR 20.000 to 24.999 APR 25.000 to 29.999 APR 30.000 to 34.999 APR 35.000 to 39.999 APR 40.000 to 69.999 APR 70.000 to 99.999 APR 100.000 or More APR Variable Rate | 58,710 329 9 22 1 0 0 0 63 4,491 | 92.28 0.52 0.01 0.03 0.00 0.00 0.00 0.00 0.10 7.06 | \$ | 25,959,365 48,836 383 2,686 1,500 0 0 37,634 2,028,066 | 92.45 0.17 0.00 0.01 0.01 0.00 0.00 0.00 0.13 7.22 |
| Total Loans Made | 63,625 | 100.00 | \$ | 28,078,470 | 100.00 |
| Total Real Property Consumer Loans Made | 63,710 | | \$ | 28,079,144 | |

| Rate Charged | Number of Loans | % of Total Number | _ | Principal Amount | % of Total Amount |
|---|---|---|-----|---|--|
| CONSUMER LOANS - OTHER SECURITIES | | | | | |
| LOANS UNDER \$2,500 | | | | | |
| Step Rate: 2.5, 2, 1.5, 1% per month | 0 | | \$ | 0 | |
| Alternate Rate: 1.6% per month Federal Reserve Bank Rate plus 10% | 0 0 | | | 0 0 | |
| Other Rates:Up to 14.999APR15.000 to 19.999APR20.000 to 24.999APR25.000 to 29.999APR30.000 to 34.999APR35.000 to 39.999APR40.000 to 69.999APR70.000 to 99.999APR100.000 or MoreAPRVariable Rate | 27,162 3,506 21,711 2 0 0 0 0 0 0 14 | 51.84 6.69 41.44 0.00 0.00 0.00 0.00 0.00 0.00 0.0 | \$ | 7,016 5,565 18,262 1 0 0 0 0 0 18 | $\begin{array}{c} 22.73 \\ 18.03 \\ 59.17 \\ 0.00 \\ 0.00 \\ 0.00 \\ 0.00 \\ 0.00 \\ 0.00 \\ 0.00 \\ 0.00 \\ 0.00 \\ 0.06 \end{array}$ |
| Total Loans Made | 52,395 | 100.00 | \$ | 30,862 | 100.00 |
| LOANS OF \$2,500 TO \$4,999 | | | | | |
| Up to 14.999APR15.000 to 19.999APR20.000 to 24.999APR25.000 to 29.999APR30.000 to 34.999APR35.000 to 39.999APR40.000 to 69.999APR70.000 to 99.999APR100.000 or MoreAPRVariable Rate | 1,078 2,662 43 2,407 0 7 0 7 0 0 0 0 | 17.35 42.83 0.69 38.73 0.00 0.11 0.00 0.00 0.00 0.29 | \$ | 4,032 9,886 166 8,812 0 27 0 27 0 0 0 69 | 17.54 43.00 0.72 38.33 0.00 0.12 0.00 0.00 0.00 0.00 0.30 |
| Total Loans Made | 6,215 | 100.00 | _\$ | 22,992 | 100.00 |

| Rate Charged | Number of Loans | % of Total Number | | Principal Amount | % of Total Amount |
|--|--|---|-----|---|--|
| CONSUMER LOANS - OTHER SECURITIES | | | | | |
| LOANS OF \$5,000 TO \$9,999 | | | | | |
| Up to 14.999APR15.000 to 19.999APR20.000 to 24.999APR25.000 to 29.999APR30.000 to 34.999APR35.000 to 39.999APR40.000 to 69.999APR70.000 to 99.999APR100.000 or MoreAPR | 38 5 8 11 5 17 0 0 0 | 45.24 5.95 9.52 13.10 5.95 20.24 0.00 0.00 0.00 | \$ | 279 39 58 84 42 115 0 0 | 45.22 6.32 9.40 13.61 6.81 18.64 0.00 0.00 0.00 |
| Variable Rate | 0 | 0.00 | | 0 | 0.00 |
| Total Loans Made | 84 | 100.00 | \$ | 617 | 100.00 |
| LOANS OF \$10,000 AND MORE | | | | | |
| Up to 14.999 APR 15.000 to 19.999 APR 20.000 to 24.999 APR 25.000 to 29.999 APR 30.000 to 34.999 APR 35.000 to 39.999 APR 40.000 to 69.999 APR 70.000 to 99.999 APR 100.000 or More APR Variable Rate | 7,102 188 7 19 25 23 0 0 0 0 115 | 94.96 2.51 0.09 0.25 0.33 0.31 0.00 0.00 0.00 1.54 | \$ | 738,624 12,844 96 678 417 357 0 0 0 88,063 | 87.82 1.53 0.01 0.08 0.05 0.04 0.00 0.00 0.00 10.47 |
| Total Loans Made | 7,479 | 100.00 | _\$ | <u>841,079</u> | 100.00 |
| Total Other Securities Consumer Loans Made | 66,173 | | \$ | 895,550 | |

Exhibit H California Finance Lenders Schedule of Loan Activity For the Year Ended December 31, 2023 (\$ in thousands)

Table 3: Consumer Loans Serviced - Unsecured and Personal Property

| | Unsecured | | | Persor | roperty | |
|--|--------------------|----|---------------------|--------------------|---------|---------------------|
| | Number of Loans | | Principal Amount | Number of Loans | | Principal Amount |
| Loans Outstanding at Prior Year End 12/31/2022 | 7,340,710 | \$ | 8,870,859 | 316,529 | \$ | 13,405,491 |
| Loans Outstanding at Year End 12/31/2023 | 8,000,172 | \$ | 8,123,393 | 187,037 | \$ | 6,604,914 |
| Loans with One or More Past Due Payments Which are Past Due 30 or More Days at 12/31/2023 | 2,278,844 | \$ | 407,945 | 3,728 | \$ | 125,833 |

Table 4: Current Year Loan Activity - Unsecured and Personal Property

| | Uns | ecure | d | Person | al Pro | operty |
|---|--------------------|-------|---------------------|--------------------|--------|---------------------|
| | Number of Loans | | Principal Amount | Number of Loans | | Principal Amount |
| Number of Loans Charged One or More Late Fees | 1,275,435 | | | 9,737 | | |
| Total Late Fees Collected | 1,747,674 | \$ | 24,714 | 13,919 | \$ | 1,140 |
| Total Number of Repossessions Conducted | 0 | | | 136 | | |
| Total Number of Loans Reinstated | 61,075 | | | 0 | | |
| Total Number of Collateral Redeemed | 0 | | | 0 | | |
| Total Collateral Sales Resulting in a Deficiency Balance | 0 | \$ | 0 | 145 | \$ | 4,634 |
| Total Collateral Sales Resulting in a Surplus Balance | 0 | \$ | 0 | 3 | \$ | 128 |
| Total Charge-Offs | 1,049,202 | \$ | 808,263 | 2,218 | \$ | 52,636 |
| Average Contracted Term of Loan (In Months) | 49 | | | 172 | | |

Exhibit H (continued) California Finance Lenders Schedule of Loan Activity For the Year Ended December 31, 2023 (\$ in thousands)

Table 5: Consumer Loans Serviced - Automobiles and Other Motor Vehicles and Auto Title Loans

| | Automobiles and Other Motor Vehicles | | | Auto Title Loans | | |
|--|---|----|---------------------|--------------------|----|---------------------|
| | Number of Loans | | Principal Amount | Number of Loans | | Principal Amount |
| Loans Outstanding at Prior Year End 12/31/2022 | 1,203,042 | \$ | 20,897,024 | 15,907 | \$ | 80,434 |
| Loans Outstanding at Year End 12/31/2023 | 1,599,779 | \$ | 28,102,398 | 25,760 | \$ | 103,951 |
| Loans with One or More Past Due Payments Which are Past Due 30 or More Days at 12/31/2023 | 53,789 | \$ | 882,701 | 1,016 | \$ | 4,429 |

Table 6: Current Year Loan Activity - Automobiles and Other Motor Vehicles and Auto Title Loans

| | Automobiles and Other Motor Vehicles | | | Auto T | Loans | |
|---|---|----|---------------------|--------------------|-------|---------------------|
| | Number of Loans | | Principal Amount | Number of Loans | | Principal Amount |
| Number of Loans Charged One or More Late Fees | 664,035 | _ | | 3,488 | | |
| Total Late Fees Collected | 1,641,766 | \$ | 25,212 | 7,491 | \$ | 83 |
| Total Number of Repossessions Conducted | 18,742 | | | 305 | | |
| Total Number of Loans Reinstated | 4,725 | | | 29 | | |
| Total Number of Collateral Redeemed | 4,490 | | | 43 | | |
| Total Collateral Sales Resulting in a Deficiency Balance | 3,572 | \$ | 43,737 | 272 | \$ | 952 |
| Total Collateral Sales Resulting in a Surplus Balance | 535 | \$ | 2,984 | 17 | \$ | 66 |
| Total Charge-Offs | 24,494 | \$ | 554,648 | 24,070 | \$ | 399,464 |
| Average Contracted Term of Loan (In Months) | 57 | | | 32 | | |

Exhibit H (continued) California Finance Lenders Schedule of Loan Activity For the Year Ended December 31, 2023 (\$ in thousands)

Table 7: Consumer Loans Serviced - Real Property and Other Security

| | Real Property | | | Other Security | | | |
|--|--------------------|----|---------------------|--------------------|----|---------------------|--|
| | Number of Loans | - | Principal Amount | Number of Loans | | Principal Amount | |
| Loans Outstanding at Prior Year End 12/31/2022 | 354,485 | \$ | 124,330,507 | 66,269 | \$ | 2,215,158 | |
| Loans Outstanding at Year End 12/31/2023 | 467,130 | \$ | 146,719,061 | 63,408 | \$ | 2,253,594 | |
| Loans with One or More Past Due Payments Which are Past Due 30 or More Days at 12/31/2023 | 15,999 | \$ | 5,363,684 | 1,804 | \$ | 27,712 | |

Table 8: Current Year Loan Activity - Real Property and Other Security

| | Real I | Prope | rty | Other | Secu | rity |
|--|--------------------|----------|---------------------|--------------------|------|---------------------|
| | Number of Loans | - | Principal Amount | Number of Loans | | Principal Amount |
| Number of Loans Charged One or More Late Fees | 76,541 | | | 6,673 | | |
| Total Late Fees Collected | 57,933 | \$ | 9,493 | 5,723 | \$ | 164 |
| Total Number of Foreclosures/ Repossessions Conducted | 40 | | | 165 | | |
| Total Number of Loans Reinstated | 5,394 | | | 42 | | |
| Total Number of Collateral Redeemed | 20 | | | 9,614 | | |
| Total Collateral Sales Resulting in a Deficiency Balance | 15 | \$ | 2,042 | 69 | \$ | 1,036 |
| Total Collateral Sales Resulting in a Surplus | | ^ | | | • | |
| Balance | 189 | \$ | 44,308 | 27 | \$ | 537 |
| Total Charge-Offs | 10 | \$ | 453 | 3,835 | \$ | 4,378 |
| Average Contracted Term of Loan (In Months) | 292 | | | 125 | | |

Exhibit I California Finance Lenders Default Rate by Security Type and Size of Loan For the Year Ended December 31, 2023

Table 9: Consumer Loans Under \$2,500

| | | | Automobiles & Other | |
|------------------------------|-----------|----------------------|------------------------|---------------------|
| | Unsecured | Personal Property | Motor Vehicles | Auto Title Loans |
| Total # of Charge-Offs | 904,029 | 132 | 376 | 6 |
| Total # of Loans Outstanding | 6,825,821 | 682 | 3,130 | 14 |
| Current Loans | 6,244,295 | 636 | 2,752 | 8 |
| 1 Payment Past Due | 252,556 | 11 | 209 | 0 |
| 2 Payments Past Due | 105,424 | 3 | 61 | 0 |
| 3 or More Payments Past Due | 223,546 | 32 | 108 | 6 |

| | Wage Assignments | Other Security | Totals | |
|------------------------------|---------------------|-------------------|-----------|--|
| Total # of Charge-Offs | 0 | 3,384 | 5,094,858 | |
| Total # of Loans Outstanding | 0 | 21,871 | 6,851,518 | |
| Current Loans | 0 | 18,948 | 6,266,639 | |
| 1 Payment Past Due | 0 | 2,465 | 255,241 | |
| 2 Payments Past Due | 0 | 367 | 105,855 | |
| 3 or More Payments Past Due | 0 | 91 | 223,783 | |

Table 10: Consumer Loans \$2,500 to \$4,999

| | Unsecured | Personal Property | Automobiles & Other Motor Vehicles | Auto Title Loans |
|------------------------------|-----------|----------------------|---|---------------------|
| Total # of Charge-Offs | 88,234 | 357 | 1,330 | 22,238 |
| Total # of Loans Outstanding | 339,684 | 1,308 | 14,103 | 22,706 |
| Current Loans | 259,794 | 1,182 | 12,248 | 329 |
| 1 Payment Past Due | 53,347 | 34 | 897 | 21,671 |
| 2 Payments Past Due | 6,887 | 24 | 344 | 44 |
| 3 or More Payments Past Due | 19,656 | 68 | 614 | 662 |

| | Wage Assignments | Other Security | Totals | |
|------------------------------|---------------------|-------------------|---------|--|
| Total # of Charge-Offs | 0 | 280 | 113,264 | |
| Total # of Loans Outstanding | 0 | 5,511 | 383,312 | |
| Current Loans | 0 | 5,064 | 278,617 | |
| 1 Payment Past Due | 0 | 257 | 76,206 | |
| 2 Payments Past Due | 0 | 65 | 7,364 | |
| 3 or More Payments Past Due | 0 | 125 | 21,125 | |

Exhibit I (continued) California Finance Lenders Default Rate by Security Type and Size of Loan For the Year Ended December 31, 2023

Table 11: Consumer Loans \$5,000 to \$9,999

| | Unsecured | Personal Property | Automobiles & Other Motor Vehicles | Auto Title Loans |
|------------------------------|-----------|----------------------|---|---------------------|
| Total # of Charge-Offs | 44,106 | 447 | 3,100 | 1,750 |
| Total # of Loans Outstanding | 290,273 | 2,464 | 35,363 | 2,005 |
| Current Loans | 241,696 | 2,260 | 31,170 | 181 |
| 1 Payment Past Due | 23,435 | 52 | 2,096 | 1,645 |
| 2 Payments Past Due | 7,588 | 39 | 657 | 29 |
| 3 or More Payments Past Due | 17,554 | 113 | 1,440 | 150 |

| | Wage | | | |
|------------------------------|-------------|---------------|----------------|---------|
| | Assignments | Real Property | Other Security | Totals |
| Total # of Charge-Offs | 0 | 6 | 11 | 49,420 |
| Total # of Loans Outstanding | 0 | 296 | 193 | 330,594 |
| Current Loans | 0 | 287 | 165 | 275,759 |
| 1 Payment Past Due | 0 | 1 | 16 | 27,245 |
| 2 Payments Past Due | 0 | 3 | 0 | 8,316 |
| 3 or More Payments Past Due | 0 | 5 | 12 | 19,274 |

Table 12: Consumer Loans \$10,000 or More

| | | | Automobiles & Other | |
|------------------------------|-----------|----------|------------------------|------------|
| | | Personal | Motor | Auto Title |
| | Unsecured | Property | Vehicles | Loans |
| Total # of Charge-Offs | 12,833 | 1,282 | 19,688 | 76 |
| Total # of Loans Outstanding | 156,361 | 178,817 | 1,086,613 | 299 |
| Current Loans | 140,668 | 175,607 | 1,054,231 | 192 |
| 1 Payment Past Due | 7,173 | 1,108 | 21,601 | 43 |
| 2 Payments Past Due | 2,617 | 510 | 6,109 | 19 |
| 3 or More Payments Past Due | 5,903 | 1,592 | 4,672 | 45 |

| | Wage | | Other | |
|------------------------------|-------------|---------------|----------|-----------|
| | Assignments | Real Property | Security | Totals |
| Total # of Charge-Offs | 0 | 4 | 160 | 34,043 |
| Total # of Loans Outstanding | 0 | 105,353 | 46,216 | 1,573,659 |
| Current Loans | 0 | 101,969 | 44,514 | 1,517,181 |
| 1 Payment Past Due | 0 | 1,755 | 675 | 32,355 |
| 2 Payments Past Due | 0 | 567 | 340 | 10,162 |
| 3 or More Payments Past Due | 0 | 1,062 | 687 | 13,961 |

Exhibit J California Finance Lenders Loans Made Online by Type of Security For the Year Ended December 31, 2023 (\$ in thousands)

Table 13: Loans Made Online

| Total Number of CFL Licensees Making Loans | 1,613 |
|--|-------------------|
| Total Number of CFL Licensees Making Online Loans | 147 |
| % of CFL Licensees Making Online Loans | 9.11% |
| | |
| Aggregate Principal Amount of All CFL Loans Made | \$ 204,091,046 |
| Aggregate Principal Amount of Online CFL Loans Made | \$ 19,122,041 |
| % of Online CFL Loans Made | 9.37% |

| Type of Security | Number of Loans | % of Total Number to All CFL Consumer Number | Principal Amount | % of Total Amount to All CFL Consumer Amount |
|------------------------------------|--------------------|--|-------------------------|--|
| CONSOMER EDANS | | | | |
| Unsecured (Under \$2,500) | 34,860,093 | 99.45 | \$ 3,893,787 | 29.95 |
| Unsecured (\$2,500 and Above) | 85,858 | 0.24 | \$ 674,011 | 5.18 |
| Personal Property | 43,253 | 0.12 | \$ 1,561,987 | 12.02 |
| Automobiles & Other Motor Vehicles | 24,085 | 0.07 | \$ 410,217 | 3.16 |
| Auto Title Loans | 42 | 0.00 | \$ 350 | 0.00 |
| Wage Assignment | 0 | 0.00 | \$ 0 | 0.00 |
| Real Property | 16,111 | 0.05 | \$ 6,348,942 | 48.84 |
| Other Security | 21,847 | 0.06 | \$ 110,170 | 0.85 |
| Total Consumer Loans Made | 35,051,289 | 100.00 | \$ 12,999,464 | 100.00 |
| Type of Security | Number of Loans | % of Total Number to All CFL Commercial Number | Principal Amount | % of Total Amount to All CFL Commercial |
| COMMERCIAL LOANS | Lound | | / into dritt | |
| | | | | |
| Unsecured | 18,669 | 33.71 | \$549,268 | 8.97 |
| Personal Property | 3,640 | 6.57 | \$2,596,860 | 42.41 |
| Automobiles & Other Motor Vehicles | 14,188 | 25.62 | \$125,013 | 2.04 |
| Business Equipment | 2,621 | 4.73 | \$293,667 | 4.80 |
| Real Property | 2,930 | 5.29 | \$1,674,430 | 27.35 |
| Other Security | 13,336 | 24.08 | \$883,339 | 14.43 |
| Total Commercial Loans Made | 55,384 | 100.00 | \$6,122,577 | 100.00 |

Exhibit K Property Assessed Clean Energy (PACE) Program Key Findings For the Year Ended December 31, 2023

The licensing and regulation of PACE program administrators by the DFPI commenced on January 1, 2019. A program administrator is a person administering a PACE program on behalf of a public agency. A PACE program provides financing for the installation of energy-efficiency improvements on real property with funding repaid through property tax assessments, as authorized by specified laws.

As of December 31, 2023, there were four PACE program administrators licensed with the DFPI, and the four licensed PACE program administrators have enrolled 3,579 PACE solicitors and 21,773 PACE solicitor agents. PACE solicitors are authorized by a program administrator to solicit a property owner to enter into an assessment contract. PACE solicitor agents are employed or retained by, and act on behalf of, a PACE solicitor to solicit a property owner to enter into an assessment contract.

Financial Code section 22692(a) requires program administrators to file with the DFPI Commissioner annual reports that provide information related to their financing activities under the program.

Key Findings

- PACE program administrators reported gross income of \$16.4 million from PACE program assessment financing in 2023.
- The total number of PACE assessment contracts funded and originated by program administrators in 2023 was 2,756 for a total amount of \$106.8 million.
- In 2023, the aggregated total fees and other charges assessed to property owners, excluding interest, was \$11.1 million.
- A total of 413 PACE assessment contracts were canceled by consumers within three or five days of execution in 2023.
- Detailed information required under Streets and Highways Code (SHC) section 5954 is available by <u>city</u>, by <u>county</u>, and by <u>ZIP code</u>.

Other Findings

• A total of <u>683 PACE assessments</u> were funded for HVAC systems, boilers, or other

temperature regulation systems not involving an emergency or immediate necessity.

- PACE program administrators reported 69 delinquent PACE assessments in 2023 involving a case of emergency or immediate necessity under Financial Code section 22687 subdivision (e). For financing involving an emergency or immediate necessity, a program administrator is not required to determine and consider the current and reasonably expected income or assets of the property owner in accordance with Financial Code section 22687, subdivision (b).
- The reported estimated amount of greenhouse gas emission reductions in 2023 was 27,289 metric tons (MT).
- The number of jobs created in 2023 related to PACE was estimated to be 1,511.
- The program administrators provided the number of <u>energy</u> and <u>water</u> saving improvement products installed during 2023. However, not all the program administrators tracked the overall average efficiency rating and whether these installed energy and water saving improvement products qualified for the Energy Star program.

PROGRAM ADMINISTRATOR LICENSING DATA

The table below shows the number of licensed PACE program administrators as of December 31, 2023. The table also includes the number of enrolled PACE solicitors and enrolled PACE solicitor agents at the calendar year end.

Table 14: Program Administrator, Solicitor, and Solicitor Agent Data

| | 2021 | 2022 | 2023 |
|---|--------|--------|--------|
| Number of Licensed Program Administrators as of January 1 | 5 | 4 | 4 |
| Number of Program Administrators License Surrendered | 0 | 0 | 0 |
| Number of Program Administrators License Revoked | 1 | 0 | 0 |
| Number of Licensed Program Administrators as of December 31 | 4 | 4 | 4 |
| Number of Enrolled PACE Solicitors at December 31 | 3,499 | 3,277 | 3,579 |
| Number of Enrolled PACE Solicitor Agents at December 31 | 18,145 | 19,168 | 21,773 |

Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Program Violations Found During Examinations For the Year Ended December 31, 2023

VIOLATIONS FOUND DURING EXAMINATIONS

PACE program administrators are subject to inspection, examination, or investigation by the Commissioner. The information provided in this section was obtained from regulatory examinations the DFPI conducted of PACE program licensees from January 1, 2021, through December 31, 2023. These examinations were conducted under the authority of Financial Code sections 22690 and 22701.

The purpose of regulatory examinations is to obtain information about whether PACE program licensees have complied with the California Financial Code ("FC"), California Code of Regulations ("CCR") and California Streets and Highways Code ("SHC").

| Table 15: Number and Type of Violations | | | | | |
|---|-----------------------|---------------------|------|------|------|
| | FC/CCR Section | SHC Section | 2021 | 2022 | 2023 |
| Failure to Update Principal Officers | 22105 | Gection | 1 | 0 | 0 |
| Provided False and Misleading Dealer Fee Disclosure | 22161 and 22689(c) | 5923(c) and 5926 | 1 | 0 | 0 |
| Improper Advanced Payment | 22161 | | 0 | 0 | 1 |
| Failure to Disclose Licensing Authority | 22162(b) | | 1 | 0 | 0 |
| Failure to Report PACE Solicitor as Enrolled | 22680(a) | | 1 | 0 | 0 |
| Failure to Monitor PACE Solicitor and Solicitor Agent Requirements | 22680(d) and (f) | | 1 | 0 | 1 |
| Improper Enrollment of PACE Solicitor Agent Who Did Not Maintain the Required Minimum Qualifications | 22680(e) and (g) | | 1 | 0 | 1 |
| Inadequate Policies and Procedures in Responding to Consumer Complaints | 22683 | | 1 | 0 | 1 |
| Approval of Ineligible Home Improvement Contracts Exceeded Maximum Amount Financed Allowed | 22684 (a)(b) | | 1 | 0 | 0 |
| The Term of the PACE Assessment Contract Exceeded the Estimated | 22684(h) | | 1 | 0 | 0 |
| Useful Life of the Measure Attributed to Greatest Portion of Funds | 22684(j) | | 1 | 0 | 0 |
| Failure to Utilize at Least Three Automated Valuation Models | 22685(a)(1) | | 1 | 0 | 0 |
| Failure to Verify Whether the Assessment Contract was Executed Prior to Work Commencement | 22686 | | 1 | 0 | 0 |
| Failure to Accurately Determine That Property Owner has An Ability to Repay the Annual PACE Assessment Payment | 22686 and 22687 | | 0 | 0 | 1 |
| Emergency Waiver of Ability to Repay Requirements Granted for Ineligible Agreements | 22687 | | 1 | 0 | 0 |
| Failure to Obtain Monthly Household Expense Information from Property Owner | 22687(a)(1) | | 1 | 0 | 0 |

Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Program Violations Found During Examinations For the Year Ended December 31, 2023

| Table 15: Number and Type of Violations (Continued) | | | | | |
|---|-------------------|-------------------------------------|------|------|------|
| | FC/CCR | SHC | 2024 | 2022 | 2022 |
| | Section | Section | 2021 | 2022 | 2023 |
| Failure to Confirm the Amount and Sources of Property Owner's Income Curing the Oral Confirmation of Key Terms Call | 22687(a)(6) | | 0 | 0 | 1 |
| Failure to Verify that Price of PACE Finance Project is Not Different from Paid in Cash Price | 22689(c) | 5926 | 1 | 0 | 0 |
| No Evidence that Property Owner Agreed to Receive Electronic Copy of Document in Lieu of Printed Copy | 22689(c) | 5898.16(b) (1) and 5898.17(a) | 1 | 0 | 0 |
| Failure to Inform Property Owner of Annual Administrative Fee in Confirmation Terms Call | 22689(c) | 5913(a)(2) | 1 | 0 | 0 |
| Failure to Produce Recording of PACE Assessment Term Confirmation Call | 22689(c) | 5913(b)(3) | 1 | 0 | 1 |
| Failure to Confirm the Assessment Contract and Financing Estimate and Disclosure to All Property Owners | 22689(c) | 5902(g) and 5913 | 1 | 0 | 0 |
| Failure to Provide the Right to Cancel in Required Format | 22689(c) | 5898.16(b) (1)(A) | 1 | 0 | 0 |
| Failure to Provide DFPI Consumer Services Contact Information | 1620.06(g) CCR | | 0 | 0 | 1 |
| Missing Required Pre-Paid Power Purchase Agreement Disclosures | | 5899.2(h) | 0 | 0 | 1 |

Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Complaint Information For the Year Ended December 31, 2023

COMPLAINT INFORMATION

In 2023, a total of 61 complaints were received by the DFPI related to PACE program administrators, PACE solicitors, and/or PACE solicitor agents. The tables below summarize issues covered in the complaints.

| | 2021 | 2022 | 2023 |
|--|------|------|------|
| Total Number of Complaints Received | 69 | 75 | 61 |
| Total Number of Complaints Awaiting Resolution | 2 | 1 | 2 |
| Total Number of Complaints Resolved | 67 | 74 | 59 |

Table 16: PACE Program Related Complaints

| | 2021 | 2022 | 2023 |
|--------------------------------------|------|------|------|
| Administrative Issue | 0 | 1 | 2 |
| Advertising Issue | 1 | 0 | 0 |
| Fraud Allegation | 4 | 5 | 13 |
| Identity Theft Allegation | 0 | 0 | 0 |
| Investment Fraud Allegation | 0 | 0 | 0 |
| Mishandled Transaction | 3 | 6 | 3 |
| False Statement or Misrepresentation | 0 | 0 | 5 |
| Overcharges | 1 | 2 | 2 |
| Payment Dispute | 13 | 12 | 6 |
| Poor Customer Service | 0 | 4 | 2 |
| Unethical Behavior or Tactics | 42 | 37 | 25 |
| Other ² | 5 | 8 | 3 |

 2 The other category includes complaints that did not specify a program administrator, solicitor, or solicitor agent, and/or complaints that were not under the DFPI's jurisdiction.

| California D | enartment of | f Financial | Protection ar | nd Innovation |
|--------------|--------------|-------------|---------------|---------------|

Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Complaint Information For the Year Ended December 31, 2023

CONSUMER PROTECTION

The DFPI will continue to utilize the tools available to protect homeowners from fraudulent actions and deceptive marketing tactics.

California homeowners experiencing problems with PACE have recourse if they're struggling to pay an assessment and are encouraged to file a complaint with the Department. Homeowners can file a complaint online at <u>dfpi.ca.gov/file-a-complaint/</u> or call toll-free at (866) 275-2677. Translation services are offered in dozens of languages. More information about the PACE program, including frequently asked questions, can be found here: <u>dfpi.ca.gov/pace-program-administrators/pace/</u>.

APPENDIX

The information provided in this section was obtained from statutorily required annual reports that PACE program administrators filed with the DFPI. The data provided in this report represents the aggregate totals for four PACE program administrators.

| Table 18: Number and Aggregate Amount of Assessment Contracts Funded | | | | | | | | |
|--|----|-------------|------|-------------|----|-------------|--|--|
| 2021 2022 2023 | | | | | | | | |
| Total Number of PACE Assessments | | 5,651 | | 3,721 | | 2,756 | | |
| Aggregate Amount of PACE Assessments Funded | \$ | 201,385,624 | \$ ´ | 138,858,354 | \$ | 106,797,956 | | |
| Average Amount of PACE Assessments Funded | \$ | 35,637 | \$ | 37,317 | \$ | 38,751 | | |

| Table 19: Assessment Contract Term | | | | | | |
|--|-------|-------|-------|--|--|--|
| | 2021 | 2022 | 2023 | | | |
| Average Term of Assessment Contract (in Years) | 22.58 | 23.38 | 24.60 | | | |
| Median Term of Assessment Contract (in Years) | 25.00 | 25.00 | 25.00 | | | |

| Table 20: Res | sidential | Property Dat | а | | |
|---|-----------|--------------|----|---------|---------------|
| | | 2021 | 2 | 022 | 2023 |
| Aggregate Average Market Value of Property Encumbered by Mortgage-Related PACE Assessments | \$ | 572,555 | \$ | 670,932 | \$ 652,694 |
| Aggregate Median Market Value of Property Encumbered by Mortgage-Related and PACE Assessments | \$ | 507,740 | \$ | 568,000 | \$ 550,200 |

| | 2021 | 2022 | 2023 |
|------------------------|-------|-------|-------|
| Up to 14.999% | 5,651 | 3,720 | 2,756 |
| 15% - 19.999% | 0 | 1 | 0 |
| 20% - 24.999% | 0 | 0 | 0 |
| 25% - 29.999% | 0 | 0 | 0 |
| 30% - 34.999% | 0 | 0 | 0 |
| 35% - 39.999% | 0 | 0 | 0 |
| 40% - 69.999% | 0 | 0 | 0 |
| 70% - 99.999% | 0 | 0 | 0 |
| At or Above 100% | 0 | 0 | 0 |
| Total PACE Assessments | 5,651 | 3,721 | 2,756 |

| Table 22: Fees and Other Charges Excluding Interest | | | | | | | |
|---|----|---------------|---------------|------------|--|--|--|
| | | 2021 | 2022 | 2023 | | | |
| Total Fees and Other Charges Assessed to | | | | | | | |
| Property Owners not Included in Interest | \$ | 18,728,034 \$ | 16,087,849 \$ | 11,138,077 | | | |
| Rate | | | | | | | |

Table 23: Number of Assessment Contract Payments Received by Program Administrators from PACE Solicitors⁴

| | 2021 | 2022 | 2023 | | | | |
|--------------------|------|------|------|--|--|--|--|
| Buydown Fee | 126 | 85 | 45 | | | | |
| Contractor Payment | 511 | 305 | 131 | | | | |
| Seller's Points | 211 | 144 | 0 | | | | |
| Other Payments | 0 | 0 | 0 | | | | |
| Total | 848 | 534 | 176 | | | | |

Table 24: Amount of Payments Received by Program Administrators from PACE Solicitors⁴

| | 2021 | 2022 | 2023 |
|------------------------------|-----------------|-----------------|-----------------|
| Buydown Fee | \$ 482,042 | \$ 608,687 | \$ 580,486 |
| Contractor Payment | \$ 2,289,348 | \$ 2,031,842 | \$ 1,310,174 |
| Seller's Points | \$ 788,696 | \$ 746,129 | \$ 0 |
| Other Payments | \$ 0 | \$ 0 | \$ 0 |
| Aggregate Amount of Payments | \$ 3,560,086 | \$ 3,386,658 | \$ 1,890,660 |
| Average Amount of Payments | \$ 4,198 | \$ 6,342 | \$ 10,742 |
| Median Amount of Payments | \$ 3,381 | \$ 4,826 | \$ 0 |
| | | | |

⁴ Newly added table pursuant to the regulations adopted in 2021.

| Table 25: Delinquent PACE Assessments |
|---------------------------------------|
|---------------------------------------|

| | 2021 | | 2022 | | 2023 | |
|-----------------------------------|------|------|------|-----------|------|-----------|
| | | | \$ | 5,781,432 | \$ | 5,764,407 |
| Average Number of Missed Payments | | 1.87 | | 2.42 | | 2.47 |

Total Delinquencies, by City, by County, and by ZIP Code.

| Table 26: Defaulted PACE Assessments | | | | | | | |
|--------------------------------------|----|-----------|----|--------------|-----------|--|--|
| | | 2021 | | 2022 | 2023 | | |
| Total Defaulted Amount | \$ | 2,445,762 | \$ | 1,220,462 \$ | 1,359,942 | | |
| Average Number of Missed Payments | | 3.67 | | 5.02 | 5.56 | | |
| Total Number of Parcels Defaulted | | 288 | | 181 | 183 | | |
| Average Number of Years in Default | | 1.16 | | 2.46 | 2.76 | | |
| Percentage of Defaulted Assessments | | 0.41% | | 0.36% | 0.28% | | |

Total Defaulted Amount, by City, by County, and by ZIP Code.

Table 27: Number of Delinquent PACE Assessments and Mortgage-Related Debt at Time Assessment Contract Was Entered

| | 2021 | 2022 | 2023 | | | |
|--|------|------|------|--|--|--|
| Above 97 Percent Cap on Total PACE and Mortgage-Related Debt | | 1 | 0 | | | |
| 87.10 – 97.00 Percent Cap on Total PACE and Mortgage-Related Debt | 96 | 14 | 7 | | | |
| Below 87 Percent Cap on Total PACE and Mortgage-Related Debt | 375 | 192 | 154 | | | |
| Total PACE Assessments | 461 | 206 | 161 | | | |

| Table 28: Method of Determining Market Value of Property for Delinquent PACE Assessments ⁷ | | | | | | | |
|---|-----|-----|-----|--|--|--|--|
| 2021 2022 2023 | | | | | | | |
| Automated Valuation Model | 396 | 191 | 156 | | | | |
| Appraisal | 65 | 15 | 5 | | | | |
| Property Valuation Not Obtained | 0 | 0 | 0 | | | | |
| Total PACE Assessments | 461 | 206 | 161 | | | | |

Table 29: Residual Income of Property Owners for Delinquent PACE Assessments⁷

| | 2021 ⁸ | 20 | 22 | 2023 |
|--|--------------------------|----|-------|-------------|
| Average Monthly Residual Income of Property Owners Upon Entering into Assessment Contract | \$ 5,149 | \$ | 5,621 | \$ 4,683 |
| Median Monthly Residual Income of Property Owners Upon Entering into Assessment Contract | \$ 2,028 | \$ | 1,834 | \$ 1,102 |

| Table 30: Foreclosure Actions (Year 2021) | | | | | | | | | | |
|---|---|----------|----|----------------------|----|--------|----|----------------|--------|---------|
| | | | | Original | | | | | | |
| Number of | | Year of | | Amount of | | Amount | Ρı | urchased Price | | |
| Foreclosure | Foreclosure Assessment Assessment Owed Upon Paid for Property | | | | | | | | Amount | |
| Actions | ZIP Code | Contract | | Contract Foreclosure | | | | at Auction | Reco | vered |
| 1 | 90291 | 2019 | \$ | 199,633 | \$ | 18,566 | \$ | 4,441,101 | \$ | 18,566 |
| 1 | 90291 | 2020 | \$ | 189,042 | | 12,473 | | 2,380,000 | \$ | 205,605 |

| Table 31: Foreclosure Actions (Year 2022) | | | | | | | | | | | |
|---|-------|------|----|---------|----|------------------------------|----|--|----|---------------------|--|
| Number of Foreclosure Actions | | | | | | mount ed Upon eclosure | | urchased Price aid for Property at Auction | | Amount Recovered | |
| 1 | 90291 | 2020 | \$ | 189,255 | \$ | 52,818 | \$ | 3,194,128 | \$ | 52,818 | |
| 1 | 91605 | 2018 | \$ | 94,349 | \$ | 94,349 | \$ | 766,513 | \$ | 0 | |

| Table 32: Foreclosure Actions (Year 2023) | | | | | | | | | | |
|---|----------|------------|----------------------|-------------|-------------------|-----------|--|--|--|--|
| Original | | | | | | | | | | |
| Number of | | Year of | Amount of | Amount | Purchased Price | | | | | |
| Foreclosure | | Assessment | Assessment Owed Upon | | Paid for Property | Amount | | | | |
| Actions | ZIP Code | Contract | Contract | Foreclosure | at Auction | Recovered | | | | |
| 1 | 92557 | 2022 | \$ 33,177 | \$ \$33,493 | \$ 417,718 | \$ 33,493 | | | | |

⁷ Newly added table pursuant to the regulations adopted in 2021.

⁸ 2021 data was revised to reflect the residual income of property owners on a monthly basis.

Table 33: PACE Assessments Funded Under Emergency

| Procedures in Financial Code section 22687(e) | | | | | | | | | |
|---|-----------------|----------|-----------------|---------|--------------|---------|--|--|--|
| | 2021 2022 | | | | 2023 | | | | |
| | Number of | Average | Number of | Average | Number of | Average | | | |
| Type of Improvement | Improvements | Cost | Improvements | Cost | Improvements | Cost | | | |
| Central Air Conditioner | 2 | \$10,644 | 0 | \$ 0 | 0 | \$ 0 | | | |
| Central Air Conditioner | 1 | 12,788 | 2 | 11,225 | 1 | 5,985 | | | |
| Emergency HVAC | | | | | | | | | |
| Central Air Conditioner | | | 0 | 0 | | | | | |
| Emergency, Furnace | 0 | 0 | | | 0 | 0 | | | |
| Emergency HVAC | | | | | | | | | |
| Cool Roof | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| Duct Replacement | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| Emergency HVAC | | | | | | | | | |
| Electric Tankless Water | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| Heater | | | | | | | | | |
| Energy Efficient | 39 | 17,444 | 14 | 18,944 | 0 | 0 | | | |
| Energy Star Windows | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| Furnace Emergency | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| HVAC | | | | | | | | | |
| Heating and Air | | | | 0 | | | | | |
| Conditioning Package | 0 | 0 | 0 | | 0 | 0 | | | |
| Unit Emergency HVAC | | | | | | | | | |
| High Performance | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| Roofing | | | | | | | | | |
| High-Efficiency HVAC | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| HVAC | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| Renewable Energy | 2 | 29,850 | 0 | 0 | 0 | 0 | | | |
| Water Conservation | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| Water Delivery Systems | 0 | 0 | 0 | 0 | 0 | 0 | | | |
| Total Improvements | 44 | | 16 | | 1_ | | | | |
| Total PACE Assessments | <u>_</u> | | | | | | | | |
| Funded Under | 42 ⁹ | | 16 ⁹ | | 1 <u>9</u> | | | | |
| Emergency Procedures in | | | | | | | | | |
| Financial Code Section | | | | | | | | | |
| 22687(e) | | | | | | | | | |
| | | | | | | | | | |

⁹ A PACE assessment may include multiple improvements.



California Department of Financial Protection and Innovation Toll-Free: 1-866-275-2677 TTY: 1-800-735-2922 Online: www.dfpi.ca.gov