



California Department of Financial Protection and Innovation

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

Report Required by Financial Code Section 22160 and 22692

Revision of Previously Published Report (January 2022)

PROTECTING CONSUMERS FOSTERING TRUST & INNOVATION





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EXECUTIVE SUMMARY

The Department of Financial Protection and Innovation 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 Department of Financial Protection and Innovation (DFPI) has compiled data submitted by finance lenders, brokers, and program administrators licensed under the California Financing Law. 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 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 <u>not</u> intended for personal, family or household purposes.

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

Key Findings

- Consumer loans with a principal loan amount of at least \$2,500 but less than \$10,000 and an Annual Percentage Rate ("APR") of 100 percent or more originated in 2020 decreased by 99.9 percent, to 36 from 376,645 in 2019. The total principal amount of such consumer loans decreased by 99.9 percent over the same period, to \$155,000 from \$1.2 billion.
- Consumer loans secured by auto title originated in 2020 decreased by 94.4 percent to 5,994 from 106,070 in 2019. The total principal amount of such consumer loans decreased by 92.6 percent over the same period, to \$30.9 million from \$415.6 million.
- This report contains the second year of reporting on PACE financing and PACE program administrators.
 - PACE program administrators reported gross income of \$43,478,875 from PACE program assessment financing in 2020, representing a 30 percent decrease since 2019.
 - The total amount of assessment contracts funded by PACE program administrators was \$332,517,305, representing a decrease of 8 percent since 2019.
 - The total number of PACE assessment contracts funded and originated in 2020 was 10,129, representing an 18 percent decrease since 2019.
 - In 2020, the aggregated total fees and other charges assessed to property owners, including interest, was \$82,549,973, representing a decrease of 1 percent since 2019.

- The number of consumer loans increased significantly due to a surge in the "buy now, pay later" unsecured consumer loans reported to the DFPI. This product growing dramatically in volume and becoming a larger percentage of the DFPI's portfolio under CFL.
 - Finance lenders originated almost 12 million consumer loans in 2020, a 530.2 percent increase over 2019. The total principal amount of loans made in 2020 increased by 96.8 percent in comparison to 2019 (from \$57 billion to \$112.2 billion).
 - The top six buy now pay later lenders accounted for 10,924,547, or **91 percent**, of the total consumer loans originated in 2020.
 - Excluding buy now pay later loans from the total number of consumer loans originated, unsecured loans accounted for 60.8 percent of the total number of consumer loans made in 2020 compared with 77.3 percent in 2019.
 - The total number of consumer loans originated by finance lenders, excluding loans made by buy now pay later lenders, decreased overall by 41.1 percent to 1,005,094 from 1,707,651 in 2019. However, the total principal amount of such consumer loans increased by 94.8 percent over the same period, to \$111 billion from \$57 billion.
- Setting aside the buy now pay later loans, the total aggregate principal amount of consumer loans increased mainly due to the increase in originations of consumer loans secured by real estate.
 - The number of consumer loans secured by real estate originated in 2020 increased by 117.2 percent to 261,777 from 120,519 in 2019. The total principal amount of such consumer loans increased by 113.8 percent over the same period, to \$101 billion from \$47.3 billion.

Other Findings

- Consumer loans with principal loan amount under \$2,500 accounted for **94.7 percent** of the total number of consumer loans made in 2020. Unsecured consumer loans made up **99.8 percent** of loans with principal amount of less than \$2,500.
- The number of commercial loans originated in 2020 decreased by 21.99 percent to 706,228 from 905,341 in 2019. The total principal amount of commercial loans decreased by 13.9 percent over the same period, to \$160.4 billion from \$186.4 billion.
- The number of online consumer loans originated in 2020 increased by 1,589 percent to 11,226,399 from 664,488 in 2019. The total principal amount of online loans increased by 24.18 percent over the same period, to \$14.5 billion from \$11.7 billion.
- The number of online commercial loans originated in 2020 increased by 23.18 percent to 36,016 from 29,239 in 2019. The total principal amount of online loans increased by 14.19 percent over the same period, to \$2.4 billion from \$2.1 billion.

BACKGROUND

The California Financing Law (Financial Code, § 22000, et seq.) (CFL) requires the licensing and regulation of finance lenders, brokers, or program administrators.

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.

The COVID-19 pandemic state of emergency was officially declared by state and federal agencies in March 2020, three months after the new law took effect, and dramatically altered the financial services landscape. A myriad of factors, including government assistance in the form of cash payments, expanded unemployment benefits and loan forbearances, likely had a significant impact on demand for loans and other consumer financial habits.

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

The DFPI is required to post a report every year on its website summarizing utilization of its Pilot Program pursuant to Financial Code section 22160.

This report contains unaudited data provided by licensees for the calendar year ending December 31, 2020. The report does not capture all consumer loans in the state, and does not include small-dollar loans made through bank partnerships, for instance.

As of December 31, 2020, the DFPI licensed 3,886 lenders, brokers, lenders and brokers, and PACE program administrators. Of the 3,886 licensees, 3,760 filed their required annual reports. All five PACE program administrators filed their annual reports. 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>https://dfpi.ca.gov/</u> <u>california-financing-law-publications/</u>.

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 Companies | Number of Licensed Locations | Number of Applications for New Licenses |
|------|------------------------------------|---------------------------------|---|
| 2020 | 3,886 | 7,194 | 1,491 |
| 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 |
| 2013 | 2,155 | 4,776 | 1,191 |
| 2012 | 2,056 | 4,385 | 889 |
| 2011 | 2,026 | 4,302 | 910 |
| | | | |

Table 1: Licensing Data

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

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

| | | | Average | Size of Loans Ma | ade |
|-------|--------------------|------------------------|-------------------|---------------------|-----------|
| Year | Number of Loans | Principal Amount of | Consumer Loans | Commercial Loans | All Loans |
| | Made | Loans Made | | | |
| 2020 | 12,635,869 | \$ 272,580,616,643 | \$ 9,402 | \$ 227,144 | \$ 21,572 |
| 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 |
| 2013 | 2,171,948 | \$ 174,302,457,184 | \$ 43,521 | \$ 106,650 | \$ 80,252 |
| 2012 | 1,876,767 | \$ 165,639,476,215 | \$ 60,110 | \$ 108,137 | \$ 88,258 |
| 2011 | 3,076,347 | \$ 139,166,897,599 | \$ 36,097 | \$ 47,604 | \$ 45,238 |

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

Exhibit A California Financing Law Licensees Consolidated Balance Sheet As of December 31, 2020 (\$ in thousands)

| <u>ASSETS</u> | | % of Total Assets |
|---|---------------------|---|
| Cash | \$ 117,442,991 | 3.89 |
| Investments | 335,198,593 | 11.10 |
| California Finance Lenders Loan Receivables | 169,063,940 | 5.60 |
| Other Receivables | 1,193,981,260 | 39.52 |
| Reserves and Withholds by Banks and Finance Companies | 6,070,403 | 0.20 |
| Real and Personal Property (Net) | 152,800,879 | 5.06 |
| Prepaid Expenses and Deferred Charges | 7,120,541 | 0.24 |
| Commissions Receivables | 2,137,590 | 0.07 |
| Other Assets | 1,037,184,133 | 34.33 |
| Total Assets | \$ 3,021,000,329 | 100.00 |
| LIABILITIES AND NET WORTH | | % of Total Liabilities and Net Worth |
| Loans and Notes Payable from Third Parties | \$ 605,895,702 | 20.06 |
| Loans and Notes Payable from Parent Companies, Affiliates, etc. | 396,839,834 | 13.14 |
| Bonds, Debentures, and Certificates of Indebtedness | 486,035,955 | 16.09 |
| Accounts Payable | 167,928,775 | 5.56 |
| Dealers' Reserves and Withholds | 1,422,492 | 0.05 |
| Accrued Taxes Other Than Income Tax | 2,183,353 | 0.07 |
| Reserve for Income Taxes | 30,926,020 | 1.02 |
| Credit Insurance Premiums Due Insurer | 303,982 | 0.01 |
| Other Liabilities and Accruals | 819,325,513 | 27.12 |
| Total Liabilities | 2,510,861,626 | 83.11 |
| Net Worth | 510,138,703 | 16.89 |
| Total Liabilities and Net Worth | \$ 3,021,000,329 | 100.00 |

Exhibit B California Finance Lenders Analysis of Loans and Receivables Outstanding As of December 31, 2020 (\$ in thousands)

| CALIFORNIA FINANCE LENDERS LOAN RECEIVABLES | Aggregate Balance | % of Subtotal |
|---|--------------------------|------------------|
| Consumer Loans | 49,834,842 | 28.66 |
| Commercial Loans | 124,043,938 | 71.34 |
| Subtotal | \$ 173,878,780 | 100.00 |
| Less: Unearned Pre-computed Charges | 834,920 | |
| Allowance for Bad Debts | 3,979,338 | |
| Net California Finance Lenders Loan Receivables | \$ 169,064,522 | |
| OTHER RECEIVABLES | | |
| Sales Contracts | \$ 360,239,039 | 29.22 |
| Leases (True Leases) | 151,074,813 | 12.25 |
| Factoring | 6,444,386 | 0.52 |
| Other | 715,219,090 | 58.01 |
| Subtotal | \$ 1,232,977,328 | 100.00 |
| Less: Unearned Pre-computed Charges | 15,625,416 | |
| Allowance for Bad Debts | 23,370,652 | |
| Net California Finance Lenders Loan Receivables | \$ 1,193,981,260 | |

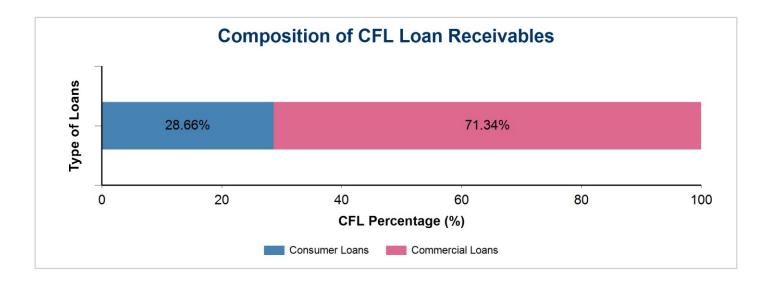


Exhibit C California Financing Law Licensees Statement of Income and Expenses Calendar Year 2020 (\$ in thousands)

| INCOME | | | % of Total Income |
|---|----|-------------|-------------------------|
| Gross Income of California Financing Law Licensees from Loans Made and Brokered Loans | \$ | 19,013,024 | 4.90 |
| Gross Income from All Other Businesses and Sources | | 369,174,497 | 95.10 |
| Total Gross Income | \$ | 388,187,521 | 100.00 |
| EXPENSES | | | |
| Loss on Loans Receivable | \$ | 5,991,763 | 1.54 |
| Professional Audit and Accounting Services | | 988,310 | 0.25 |
| Insurance and Bond Premiums | | 494,905 | 0.13 |
| Legal Services and Expenses | | 1,320,256 | 0.34 |
| Occupancy Expenses | | 2,595,738 | 0.67 |
| Provision for Bad Debt Allowance | | 13,092,138 | 3.37 |
| Salaries and Bonuses: Employees | | 41,162,317 | 10.60 |
| Salaries and Bonuses: Owners, Partners, Executives | | 1,887,664 | 0.49 |
| Depreciation | | 31,681,910 | 8.16 |
| License Fees and Taxes | | 1,112,407 | 0.29 |
| Telephone and Utilities | | 639,012 | 0.16 |
| Advertising and Promotions | | 5,614,275 | 1.45 |
| Other Expenses | | 172,914,814 | 44.54 |
| Total Expenses Before Interest and Income Taxes | \$ | 279,495,509 | 72.00 |
| Income or Loss Before Interest and Income Taxes | \$ | 108,692,012 | 28.00 |
| Less: Interest Paid to Bona Fide Third Parties | | 25,934,255 | 6.68 |
| Interest Paid to Parent Company, Affiliates and Others | i | 8,428,364 | |
| Income or Loss Before Income Taxes | \$ | 74,329,393 | 19.15 |
| Less: Provision for Income Taxes | | 3,635,453 | 0.94 |
| Net Income or (Loss) | \$ | 70,693,940 | 18.21 |

Exhibit D California Financing Law Licensees Analysis of Income Received Calendar Year 2020 (\$ 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 | \$ | 271,168 | \$ 6,053,580 | \$ | 6,324,748 |
| Collection from Charged-Off Accounts | | 674 | 73,905 | | 74,579 |
| Income from Credit Insurance | | 14 | 3,243 | | 3,257 |
| Other Insurance Commissions | | 0 | 2,846 | | 2,846 |
| Administrative Fees | | 1,238 | 288,334 | | 289,572 |
| Commissions from Loan Brokering | | 32,459 | 485,005 | | 517,464 |
| Other Income | | 16,687 | 1,123,263 | | 1,139,950 |
| Income from Consumer Loans | \$ | 322,240 | \$ 8,030,176 | \$ | 8,352,416 |
| COMMERCIAL LOANS | | | | | |
| Charges Earned on Loans | | | | \$ | 9,333,266 |
| Collection from Charged-Off Accounts | | | | | 31,835 |
| Income from Credit Insurance | | | | | 1,089 |
| Other Insurance Commissions | | | | | 877 |
| Commissions from Loan Brokering | | | | | 96,612 |
| Other Income | | | | | 1,196,928 |
| Income from Commercial Loans | | | | \$ | 10,660,607 |
| Total Income from All Loans | | | | \$ | 19,013,023 |
| ALL OTHER BUSINESS AND SOURCES | | | | | |
| Charges Earned on Loans | | | | \$ | 153,708,459 |
| Other Interest or Return on Investments | | | | | 9,833,507 |
| Collection from Charged-Off Accounts | | | | | 2,972,290 |
| Income from Credit Insurance | | | | | 20,666 |
| Other Insurance Commissions | | | | | 9,879,871 |
| Other Income Relating to Loans | | | | | 192,759,704 |
| Total Income from All Other Business and S | Source | es | | \$ | 369,174,497 |

Exhibit E California Finance Lenders Loans Made or Refinanced by Size Calendar Year 2020 (\$ in thousands)

| Size of Loans | Number of Loans | % of Total Number | Pi | rincipal Amount | % of Total Amount |
|----------------------------------|--------------------|----------------------|----|-----------------|----------------------|
| CONSUMER LOANS | | | | | |
| \$ 499 or less | 11,021,521 | 92.39 | \$ | 1,142,677 | 1.02 |
| 500 to 1,999 | 259,225 | 2.17 | | 195,805 | 0.17 |
| 2,000 to 2,499 | 13,477 | 0.11 | | 29,673 | 0.03 |
| 2,500 to 4,999 | 110,131 | 0.92 | | 380,328 | 0.34 |
| 5,000 to 9,999 | 139,638 | 1.17 | | 996,845 | 0.89 |
| 10,000 or more | 385,649 | 3.23 | | 109,419,563 | 97.55 |
| Total Consumer Loans Made | 11,929,641 | 100.00 | \$ | 112,164,891 | 100.00 |
| COMMERCIAL LOANS | | | | | |
| \$5,000 or more | 706,228 | 100.00 | \$ | 160,415,726 | 100.00 |
| Total Commercial Loans Made | 706,228 | 100.00 | \$ | 160,415,726 | 100.00 |
| Total Loans Made, All Categories | 12,635,869 | | \$ | 272,580,617 | |

Breakdown of Number of Consumer Loans by Loan Size

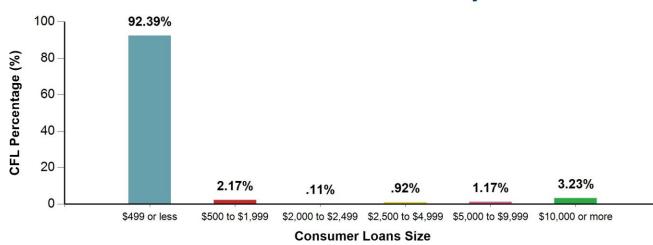
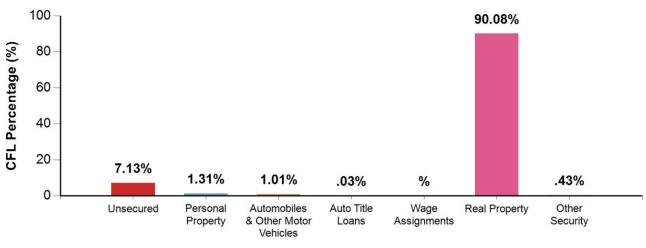


Exhibit F California Finance Lenders Loans Made or Refinanced by Type of Security Calendar Year 2020 (\$ in thousands)

| Type of Security | Number of Loans | % of Total Number | | | % of Total Amount |
|---|--|--|----|---|---|
| CONSUMER LOANS | | | | | |
| LOANS UNDER \$2,500 | | | | | |
| Unsecured Personal Property Automobiles & Other Motor Vehicles Auto Title Loans Wage Assignments Other Security | 11,271,385 887 146 67 66 <u>21,672</u> | 99.80 0.01 0.00 0.00 0.00 0.19 | \$ | 1,345,790 1,406 264 107 150 <u>20,437</u> | 98.37 0.10 0.02 0.01 0.01 1.49 |
| Total Loans Made | 11,294,223 | 100.00 | \$ | 1,368,154 | 100.00 |
| LOANS OF \$2,500 TO \$4,999 | | | | | |
| Unsecured Personal Property Automobiles & Other Motor Vehicles Auto Title Loans Wage Assignments Other Security | 93,381 2,291 4,726 3,557 0 <u>6,176</u> | 84.79 2.08 4.29 3.23 0.00 <u>5.61</u> | \$ | 319,038 8,425 18,466 11,369 0 23,031 | 83.88 2.22 4.86 2.99 0.00 <u>6.06</u> |
| Total Loans Made | 110,131 | 100.00 | \$ | 380,328 | 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 | 115,867 2,381 19,090 1,973 0 202 125 | 82.98 1.71 13.67 1.41 0.00 0.14 0.09 | \$ | 822,744 15,868 142,545 13,281 0 1,525 883 | 82.53 1.59 14.30 1.33 0.00 0.15 <u>0.09</u> |
| Total Loans Made | 139,638 | 100.00 | \$ | 996,846 | 100.00 |
| LOANS OF \$10,000 AND MORE | | | | | |
| Unsecured Personal Property Automobiles & Other Motor Vehicles Auto Title Loans Wage Assignments Real Property Other Security | 54,483 22,399 42,679 397 0 261,575 4,116 | 14.13 5.81 11.07 0.10 0.00 67.83 <u>1.07</u> | \$ | 5,514,547 1,447,260 969,105 6,161 0 101,040,364 442,126 | 5.04 1.32 0.89 0.01 0.00 92.34 0.40 |
| Total Loans Made | 385,649 | 100.00 | \$ | 109,419,563 | 100.00 |
| Total Consumer Loans Made | 11,929,641 | | \$ | 112,164,893 | |

| Type of Security | Number of Loans | % of Total Number | Principal Amount | | % of Total Amount |
|------------------------------------|--------------------|----------------------|---------------------|-------------|----------------------|
| ALL CONSUMER LOANS | | | | | |
| Unsecured | 11,535,116 | 96.69 | \$ | 8,002,120 | 7.13 |
| Personal Property | 27,958 | 0.23 | | 1,472,959 | 1.31 |
| Automobiles & Other Motor Vehicles | 66,641 | 0.56 | | 1,130,380 | 1.01 |
| Auto Title Loans | 5,994 | 0.05 | | 30,918 | 0.03 |
| Wage Assignments | 66 | 0.00 | | 150 | 0.00 |
| Real Property | 261,777 | 2.19 | | 101,041,889 | 90.08 |
| Other Security | 32,089 | 0.27 | | 486,477 | 0.43 |
| | | | | | |
| Total Consumer Loans Made | 11,929,641 | 100.00 | \$ | 112,164,893 | 100.00 |

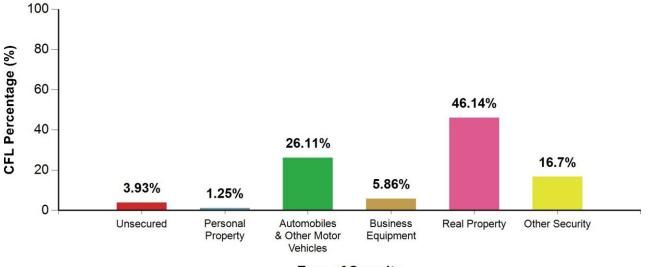
Breakdown of Dollar Amount of Consumer Loans Made or Refinanced by Type of Security



Type of Security

| Type of Security | Number of Loans | % of Total Number | | Principal Amount | % of Total Amount |
|------------------------------------|--------------------|----------------------|-----|---------------------|----------------------|
| COMMERCIAL LOANS | | | | | |
| Unsecured | 61,015 | 8.64 | \$ | 6,306,529 | 3.93 |
| Personal Property | 3,465 | 0.49 | | 2,009,186 | 1.25 |
| Automobiles & Other Motor Vehicles | 528,333 | 74.81 | | 41,881,984 | 26.11 |
| Business Equipment | 28,307 | 4.01 | | 9,401,307 | 5.86 |
| Real Property | 26,807 | 3.80 | | 74,023,118 | 46.14 |
| Other Security | 58,301 | 8.26 | | 26,793,603 | 16.70 |
| Total Commercial Loans Made | 706,228 | 100.00 | _\$ | 160,415,727 | 100.00 |
| Total Loans Made, All Categories | 12,635,869 | | \$ | 272,580,620 | |

Breakdown of Dollar Amount of Commercial Loans Made or Refinanced by Type of Security



Type of Security

| 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 | 115,016 | | \$ 33,155 | |
| Alternate Rate: 1.6% per month Federal Reserve Bank Rate plus 10% | 56 0 | | 75 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 | 10,951,228 51,825 30,551 1,014 82,561 59,567 94,546 19,193 3,614 124 | 96.96 0.46 0.27 0.01 0.73 0.53 0.84 0.17 0.03 0.00 | \$ 1,173,187 34,548 14,213 963 20,781 58,652 59,186 5,353 983 289 | 85.75 2.53 1.04 0.07 1.52 4.29 4.33 0.39 0.07 0.02 |
| Total Loans Made | 11,294,223 | 100.00 | \$ 1,368,155 | 100.00 |
| 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 | 3,185 4,366 1,678 4,587 12,622 81,807 1,821 49 15 1 | 2.89 3.96 1.52 4.17 11.46 74.28 1.65 0.04 0.01 0.00 | \$ 11,266 15,753 6,035 16,950 41,106 283,288 5,734 148 45 3 | 2.96 4.14 1.59 4.46 10.81 74.49 1.51 0.04 0.01 0.00 |
| Total Loans Made | 110,131 | 100.00 | \$ 380,328 | 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 14.999 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 | 3,334 1,330 4,372 9,852 38,412 82,196 19 62 21 40 | 2.39 0.95 3.13 7.06 27.51 58.86 0.01 0.04 0.02 0.03 | \$ | 23,492 9,402 33,262 78,359 295,298 556,115 122 388 110 298 | 2.36 0.94 3.34 7.86 29.62 55.79 0.01 0.04 0.01 0.03 |
| Total Loans Made | 139,638 | 100.00 | \$ | <u>996,846</u> | 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 | 332,840 7,134 11,395 6,203 6,111 17,268 119 755 1,759 2,065 385,649 | 86.31 1.85 2.95 1.61 1.58 4.48 0.03 0.20 0.46 <u>0.54</u> | \$ | 107,393,236 153,612 189,017 81,963 84,100 221,847 1,948 8,723 652,776 632,339 109,419,561 | 98.15 0.14 0.17 0.07 0.08 0.20 0.00 0.01 0.60 0.58 100.00 |
| Total Consumer Loans Made | 11,929,641 | | \$ | 112,164,890 | |

| Rate Charged | Number of Loans | % of Total Number | Principal Amount | % of Total Amount |
|---|--|---|--|---|
| COMMERCIAL LOANS | | | | |
| 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 | 623,648 36,785 3,467 4,690 1,767 1,370 5,213 3,032 6,868 | 88.31 5.21 0.49 0.66 0.25 0.19 0.74 0.43 0.97 | \$ 129,582,767 1,736,479 394,623 299,726 177,112 84,914 218,119 138,636 1,183,531 | 80.78 1.08 0.25 0.19 0.11 0.05 0.14 0.09 0.74 |
| Variable Rate Total Commercial Loans Made | <u> </u> | <u> </u> | \$ 26,599,819 160,415,726 | <u> 16.58</u> <u> 100.00</u> |
| Total Loans Made, All Categories | 12,635,869 | | \$ 272,580,616 | |

| 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 | 115,004 | | \$ | 33,134 | |
| Alternate Rate: 1.6% per month Federal Reserve Bank Rate plus 10% | 53 0 | | | 74 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 | 10,947,030 34,043 29,858 997 82,549 59,556 94,545 19,193 3,614 0 11,271,385 | 97.12 0.30 0.26 0.01 0.73 0.53 0.84 0.17 0.03 0.00 100.00 | \$ | 1,168,716 18,140 13,073 937 20,766 58,637 59,185 5,353 983 0 1,345,790 | 86.84 1.35 0.97 0.07 1.54 4.36 4.40 0.40 0.07 0.00 100.00 |
| LOANS OF \$2,500 TO \$4,999 | | | <u> </u> | 1,010,100 | |
| 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 | 1,877 1,401 766 1,797 11,037 74,745 1,750 5 2 | 2.01 1.50 0.82 1.92 11.82 80.04 1.87 0.01 0.00 0.00 | \$ | 6,482 4,622 2,678 6,417 35,061 258,228 5,528 15 5 3 | 2.03 1.45 0.84 2.01 10.99 80.94 1.73 0.00 0.00 0.00 |
| Total Loans Made | 93,381 | 100.00 | \$ | 319,039 | 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 14.999APR15.000 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 | 2,445 907 968 6,992 33,631 70,868 3 2 17 | $\begin{array}{c} 2.11 \\ 0.78 \\ 0.84 \\ 6.03 \\ 29.03 \\ 61.16 \\ 0.00 \\ 0.00 \\ 0.01 \end{array}$ | \$ | 17,216 6,060 6,768 57,160 260,081 475,096 18 10 88 | 2.09 0.74 0.82 6.95 31.61 57.75 0.00 0.00 0.00 |
| Variable Rate | 34 | 0.03 | | 247 | 0.03 |
| Total Loans Made | 115,867 | 100.00 | \$ | 822,744 | 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 | 36,710 1,374 850 2,645 1,264 10,074 1 689 100 <u>776</u> 54,483 | 67.38 2.52 1.56 4.85 2.32 18.49 0.00 1.26 0.18 <u>1.42</u> | \$ | 5,171,164 35,287 12,399 27,897 15,802 125,821 10 7,892 1,010 117,265 5,514,547 | 93.77 0.64 0.22 0.51 0.29 2.28 0.00 0.14 0.02 2.13 100.00 |
| Total Unsecured Consumer Loans Made | 11,535,116 | | \$ | 8,002,120 | |

| Rate Charged | Number of Loans | % of Total Number | _ | Principal Amount | % of Total Amount |
|--|---|---|----|--|---|
| CONSUMER LOANS - PERSONAL PROPERT | <u>Y (HOUSEHOLD I</u> | TEMS) | | | |
| 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 MoreAPR | 234 95 554 4 0 0 0 0 0 | $26.38 \\ 10.71 \\ 62.46 \\ 0.45 \\ 0.00$ | \$ | 374 143 883 6 0 0 0 0 0 0 | $26.60 \\ 10.17 \\ 62.80 \\ 0.43 \\ 0.00$ |
| Variable Rate | 0 | 0.00 | | 0 | 0.00 |
| Total Loans Made | 887 | 100.00 | \$ | 1,406 | 100.00 |
| 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 | 207 63 525 59 275 1,162 0 0 0 | 9.04 2.75 22.92 2.58 12.00 50.72 0.00 0.00 0.00 0.00 | \$ | 748 235 1,854 226 1,008 4,354 0 0 0 0 | 8.88 2.79 22.01 2.68 11.96 51.68 0.00 0.00 0.00 0.00 |
| Total Loans Made | 2,291 | 100.00 | \$ | 8,425 | 100.00 |

| Rate Charged | Number of Loans | % of Total Number | _ | Principal Amount | % of Total Amount |
|--|---|---|-----|--|---|
| CONSUMER LOANS - PERSONAL PROPER | <u>TY (HOUSEHOLD I</u> | <u>TEMS)</u> | | | |
| 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 | 332 3 242 52 340 1,412 0 0 0 | 13.94 0.13 10.16 2.18 14.28 59.30 0.00 0.00 0.00 | \$ | 2,138 23 1,636 340 2,260 9,471 0 0 0 | $13.47 \\ 0.14 \\ 10.31 \\ 2.14 \\ 14.24 \\ 59.69 \\ 0.00 \\ 0.0$ |
| Variable Rate | 0 | 0.00 | | 0 | 0.00 |
| Total Loans Made | 2,381 | 100.00 | _\$ | 15,868 | 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 | 20,629 22 45 24 7 25 4 0 1,643 0 22,399 | 92.10 0.10 0.20 0.11 0.03 0.11 0.02 0.00 7.34 0.00 100.00 | \$ | 794,549 1,683 787 580 76 280 213 0 649,093 0 1,447,261 | 54.90 0.12 0.05 0.04 0.01 0.02 0.01 0.00 44.85 0.00 100.00 |
| Total Personal Property Consumer Loans Made | 27,958 | | \$ | 1,472,960 | |

| 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 | 10 9 118 3 2 1 0 0 0 0 | 6.85 6.16 80.82 2.05 2.05 1.37 0.68 0.00 0.00 0.00 0.00 | \$ | 19 17 214 5 6 3 0 0 0 0 0 264 | 7.20 6.44 81.06 1.89 2.27 1.14 0.00 0.00 0.00 0.00 0.00 100.00 |
| 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 | 18 47 319 526 1,270 2,543 3 0 0 0 | $\begin{array}{r} 0.38\\ 0.99\\ 6.75\\ 11.13\\ 26.87\\ 53.81\\ 0.06\\ 0.00\\ 0.00\\ 0.00\\ 0.00\\ 0.00\\ \end{array}$ | \$ | 66 183 1,241 2,103 4,899 9,963 11 0 0 0 | $\begin{array}{c} 0.36\\ 0.99\\ 6.72\\ 11.39\\ 26.53\\ 53.95\\ 0.06\\ 0.00\\ 0.00\\ 0.00\\ 0.00\\ 0.00\\ \end{array}$ |
| Total Loans Made | 4,726 | 100.00 | \$ | 18,466 | 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 | 317 408 3,128 2,790 4,383 8,064 0 0 0 | 1.66 2.14 16.39 14.61 22.96 42.24 0.00 0.00 0.00 | \$ 2,366 3,241 24,642 20,731 32,561 59,003 0 0 0 | 1.66 2.27 17.29 14.54 22.84 41.39 0.00 0.00 0.00 |
| Variable Rate | 0 | 0.00 | 0 | 0.00 |
| Total Loans Made | 19,090 | 100.00 | \$ 142,544 | 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 | 11,201 5,719 10,474 3,519 4,747 7,019 0 0 0 0 0 0 | 26.24 13.40 24.54 8.25 11.12 16.45 0.00 0.00 0.00 0.00 0.00 | \$ 467,969 113,483 173,896 53,111 66,735 93,911 0 0 0 0 0 0 | 48.29 11.71 17.94 5.48 6.89 9.69 0.00 0.00 0.00 0.00 0.00 0.00 |
| Total Automobiles & Other Motor Vehicles Consumer Loans Made | 66,641 | | \$ 1,130,37 <u>9</u> | |

| 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% | 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 | 20 2 17 10 9 9 0 0 0 0 0 0 | 29.85 2.99 25.37 14.93 13.43 13.43 0.00 0.00 0.00 0.00 0.00 100.00 | \$ 31 4 36 14 9 12 0 0 0 0 0 0 | 29.25 3.77 33.96 13.21 8.49 11.32 0.00 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 | 11 7 40 7 32 3,335 68 44 13 0 | 0.31 0.20 1.12 0.20 0.90 93.76 1.91 1.24 0.37 0.00 | \$ 36 22 153 25 107 10,659 194 133 40 0 | 0.32 0.19 1.35 0.22 0.94 93.75 1.71 1.17 0.35 0.00 |
| Total Loans Made | 3,557 | 100.00 | \$ 11,369 | 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 10 34 15 23 1,800 16 60 4 | 0.56 0.51 1.72 0.76 1.17 91.23 0.81 3.04 0.20 | \$ | 73 66 216 100 140 12,183 104 378 22 | 0.55 0.50 1.63 0.75 1.05 91.73 0.78 2.85 0.17 |
| Variable Rate | 0 | 0.00 | | 0 | 0.00 |
| Total Loans Made | 1,973 | 100.00 | \$ | 13,282 | 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 | 22 10 21 8 60 85 114 66 11 0 397 | 5.54 2.52 5.29 2.02 15.11 21.41 28.72 16.62 2.77 0.00 | \$ | 619 210 396 134 1,051 1,012 1,725 831 182 0 6,160 | 10.05 3.41 6.43 2.18 17.06 16.43 28.00 13.49 2.95 0.00 |
| | | | <u> </u> | <u> </u> | |
| Total Auto Title Consumer Loans Made | 5,994 | | \$ | 30,917 | |

| 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 | 0 | | 0 | |
| Federal Reserve Bank Rate plus 10% | 0 | | 0 | |
| Other Rates: | | | | |
| Up to 14.999 APR | 66 | 100.00 | \$ 150 | 100.00 |
| 15.000 to 19.999 APR | 0 | 0.00 | 0 | 0.00 |
| 20.000 to 24.999 APR | 0 | 0.00 | 0 | 0.00 |
| 25.000 to 29.999 APR | 0 | 0.00 | 0 | 0.00 |
| 30.000 to 34.999 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 |
| 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 | 0 | 0.00 | 0 | 0.00 |
| Total Loans Made | 66 | 100.00 | \$ 150 | 100.00 |
| LOANS OF \$2,500 TO \$4,999 | | | | |
| Up to 14.999 APR | 0 | 0.00 | \$ 0 | 0.00 |
| 15.000 to 19.999 APR | 0 | 0.00 | 0 | 0.00 |
| 20.000 to 24.999 APR | 0 | 0.00 | 0 | 0.00 |
| 25.000 to 29.999 APR | 0 | 0.00 | 0 | 0.00 |
| 30.000 to 34.999 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 |
| 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 | 0 | 0.00 | 0 | 0.00 |
| 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 14.999 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 | 0 0 0 0 0 0 0 0 0 | $\begin{array}{c} 0.00\\ 0.00\\ 0.00\\ 0.00\\ 0.00\\ 0.00\\ 0.00\\ 0.00\\ 0.00\\ 0.00\\ 0.00\\ 0.00\end{array}$ | \$ | 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 |
| 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 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 | 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0 |
| | 0 | 0.00 | <u> </u> | 0 | 0.00 |
| Total Wage Assignment Consumer Loans Made | 66 | | \$ | 150 | |

| 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 14.999 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 | 196 0 0 0 0 0 0 0 0 | 97.03 0.00 0.00 0.00 0.00 0.00 0.00 0.00 | \$ | 1,474 0 0 0 0 0 0 0 0 | 96.66 0.00 0.00 0.00 0.00 0.00 0.00 0.00 |
| Variable Rate | 6 | 2.97 | | 51 | 3.34 |
| Total Loans Made | 202 | 100.00 | \$ | 1,525 | 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 | 260,283 0 0 0 0 0 0 0 0 5 1,287 261,575 | 99.51 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0 | \$ | 100,532,491 0 0 0 0 0 0 2,491 505,382 101,040,364 | 99.50 0.00 0.00 0.00 0.00 0.00 0.00 0.00 |
| Total Real Property Consumer Loans Made | 261,777 | | \$ | 101,041,889 | |

| 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 | 12 | | \$ 21 | |
| Alternate Rate: 1.6% per month Federal Reserve Bank Rate plus 10% | 3 0 | | 1 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 | 3,868 17,676 4 0 0 0 0 0 0 0 0 0 | 17.85 81.56 0.02 0.00 0.00 0.00 0.00 0.00 0.00 0.0 | \$ 3,896 16,245 7 0 0 0 0 0 0 289 | 19.06 79.49 0.03 0.00 0.00 0.00 0.00 0.00 0.00 1.41 |
| Total Loans Made | 21,672 | 100.00 | \$ 20,437 | 100.00 |
| 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 | 1,072 2,848 28 2,198 8 22 0 0 0 0 0 | $17.36 \\ 46.11 \\ 0.45 \\ 35.59 \\ 0.13 \\ 0.36 \\ 0.00$ | \$ 3,935 10,690 109 8,180 32 85 0 0 0 0 0 | 17.09 46.42 0.47 35.52 0.14 0.37 0.00 0.00 0.00 0.00 |
| Total Loans Made | <u> </u> | 100.00 | \$ 23,031 | 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 | 33 2 0 3 35 52 0 0 0 | $26.40 \\ 1.60 \\ 0.00 \\ 2.40 \\ 28.00 \\ 41.60 \\ 0.00$ | \$ | 225 12 0 27 255 363 0 0 0 | $25.51 \\ 1.36 \\ 0.00 \\ 3.06 \\ 28.91 \\ 41.16 \\ 0.00 \\ 0.00 \\ 0.00 \\ 0.00$ |
| Variable Rate | 0 | 0.00 | | 0 | 0.00 |
| Total Loans Made | 125 | 100.00 | \$ | 882 | 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 | 3,995 9 5 7 33 65 0 0 0 2 4,116 | 97.06 0.22 0.12 0.17 0.80 1.58 0.00 0.00 0.00 0.00 0.05 | \$ | 426,444 2,948 1,541 242 436 823 0 0 0 0 9,691 442,125 | 96.45 0.67 0.35 0.05 0.10 0.19 0.00 0.00 0.00 2.19 100.00 |
| | <u> </u> | | <u> </u> | | |
| Total Other Securities Consumer Loans Made | 32,089 | | \$ | 486,475 | |

Exhibit H California Finance Lenders Schedule of Loan Activity Calendar Year 2020 (\$ in thousands)

Table 3: Consumer Loans Serviced - Unsecured and Personal Property

| | Unsec | ured | Personal Property | |
|--|--------------------|---------------------|--------------------|---------------------|
| | Number of Loans | Principal Amount | Number of Loans | Principal Amount |
| Loans Outstanding at Prior Year End 12/31/2019 | 1,450,951 | \$10,082,315 | 103,120 | \$2,618,333 |
| Loans Outstanding at Year End 12/31/2020 | 3,615,542 | \$8,921,018 | 121,365 | \$2,893,084 |
| Loans with One or More Past Due Payments Which are Past Due 30 or More Days at 12/31/2020 | 779,218 | \$291,576 | 1,586 | \$42,801 |

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

| | Unsecu | red | Personal Property | | |
|--|--------------------|---------------------|--------------------|---------------------|--|
| | Number of Loans | Principal Amount | Number of Loans | Principal Amount | |
| Number of Loans Charged One or More Late Fees | 540,933 | | 6,832 | | |
| Total Late Fees Collected | 798,347 | \$10,631 | 5,644 | \$225 | |
| Total Number of Repossessions Conducted | 0 | | 63 | | |
| Total Number of Loans Reinstated | 20,516 | | 2 | | |
| Total Number of Collateral Redeemed | 0 | | 141 | | |
| Total Collateral Sales Resulting in a Deficiency Balance | 0 | \$0 | 38 | \$296 | |
| Total Collateral Sales Resulting in a Surplus Balance | 0 | \$0 | 5 | \$302 | |
| Total Charge-offs | 500,328 | \$498,918 | 5,341 | \$50,759 | |
| Average Contracted Term of Loan (In Months) | 37 | | 114 | | |

Exhibit H (continued) California Finance Lenders Schedule of Loan Activity Calendar Year 2020 (\$ in thousands)

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

| | Automobi Other Motor | | Auto Title Loans | | |
|--|-------------------------|---------------------|--------------------|---------------------|--|
| | Number of Loans | Principal Amount | Number of Loans | Principal Amount | |
| Loans Outstanding at Prior Year End 12/31/2019 | 1,609,563 | \$25,872,276 | 113,988 | \$383,066 | |
| Loans Outstanding at Year End 12/31/2020 | 330,649 | \$3,872,827 | 49,979 | \$154,473 | |
| Loans with One or More Past Due Payments Which are Past Due 30 or More Days at 12/31/2020 | 1,036,736 | \$103,762 | 2,857 | \$10,560 | |

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

| | Automobiles and Other Motor Vehicles | | Auto Title L | oans |
|---|---|---------------------|--------------------|---------------------|
| | Number of Loans | Principal Amount | Number of Loans | Principal Amount |
| Number of Loans Charged One or More Late Fees | 137,461 | | 16,396 | |
| Total Late Fees Collected | 109,739 | \$3,846 | 64,071 | \$1,012 |
| Total Number of Repossessions Conducted | 5,345 | | 9,382 | |
| Total Number of Loans Reinstated | 630 | | 1,248 | |
| Total Number of Collateral Redeemed | 352 | | 781 | |
| Total Collateral Sales Resulting in a Deficiency Balance | 2,819 | \$26,626 | 5,979 | \$9,672 |
| Total Collateral Sales Resulting in a Surplus Balance | 20 | \$68 | 109 | \$548 |
| Total Charge-offs | 9,776 | \$118,071 | 10,872 | \$33,623 |
| Average Contracted Term of Loan (In Months) | 55 | | 28 | |

Exhibit H (continued) California Finance Lenders Schedule of Loan Activity Calendar Year 2020 (\$ in thousands)

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

| | Real Pr | operty | Other Security | | |
|--|--------------------|---------------------|--------------------|---------------------|--|
| | Number of Loans | Principal Amount | Number of Loans | Principal Amount | |
| Loans Outstanding at Prior Year End 12/31/2019 | 222,894 | \$69,376,998 | 44,935 | \$7,227,669 | |
| Loans Outstanding at Year End 12/31/2020 | 336,603 | \$106,566,433 | 56,242 | \$7,689,384 | |
| Loans with One or More Past Due Payments Which are Past Due 30 or More Days at 12/31/2020 | 29,478 | \$9,705,671 | 2,080 | \$557,145 | |

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

| | Real Property | | Other Secu | urity |
|---|--------------------|---------------------|--------------------|---------------------|
| | Number of Loans | Principal Amount | Number of Loans | Principal Amount |
| Number of Loans Charged One or More Late Fees | 70,566 | | 12,332 | |
| Total Late Fees Collected | 72,686 | \$11,831 | 11,531 | \$1,239 |
| Total Number of Foreclosures/ Repossessions Conducted | 343 | | 104 | |
| Total Number of Loans Reinstated | 2,163 | | 109 | |
| Total Number of Collateral Redeemed | 493 | | 27 | |
| Total Collateral Sales Resulting in a Deficiency Balance | 329 | \$46,629 | 96 | \$1,504 |
| Total Collateral Sales Resulting in a Surplus Balance | 77 | \$7,858 | 65 | \$4,511 |
| Total Charge-offs | 36 | \$3,182 | 9,514 | \$4,468 |
| Average Contracted Term of Loan (In Months) | 267 | | 100 | |

Exhibit I California Finance Lenders Default Rate by Security Type and Size of Loan As of December 31, 2020

Table 9: Consumer Loans Under \$2,500

| | Unsecured | Personal Property | Automobiles & Other Motor Vehicles | Auto Title Loans |
|------------------------------|-----------|----------------------|--|---------------------|
| Total # of Charge-Offs | 394,195 | 352 | 572 | 5 |
| Total # of Loans Outstanding | 3,887,481 | 2,290 | 1,332 | 62 |
| Current Loans | 3,623,240 | 2,205 | 1,079 | 48 |
| 1 Payment Past Due | 91,591 | 30 | 143 | 4 |
| 2 Payments Past Due | 68,829 | 16 | 33 | 10 |
| 3 or More Payments Past Due | 103,821 | 39 | 77 | 0 |

| | Wage Assignments | Other Security | Totals | |
|------------------------------|---------------------|-------------------|-----------|--|
| Total # of Charge-Offs | 0 | 9,096 | 404,220 | |
| Total # of Loans Outstanding | 0 | 13,341 | 3,904,506 | |
| Current Loans | 0 | 10,880 | 3,637,452 | |
| 1 Payment Past Due | 0 | 859 | 92,627 | |
| 2 Payments Past Due | 0 | 538 | 69,426 | |
| 3 or More Payments Past Due | 0 | 1,064 | 105,001 | |

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

| | Unsecured | Personal Property | Automobiles & Other Motor Vehicles | Auto Title Loans |
|------------------------------|-----------|----------------------|--|---------------------|
| Total # of Charge-Offs | 74,576 | 860 | 791 | 9,345 |
| Total # of Loans Outstanding | 217,711 | 6,624 | 7,228 | 34,224 |
| Current Loans | 173,907 | 6,392 | 6,510 | 27,683 |
| 1 Payment Past Due | 19,418 | 70 | 413 | 3,736 |
| 2 Payments Past Due | 6,928 | 29 | 102 | 1,305 |
| 3 or More Payments Past Due | 17,458 | 133 | 203 | 1,500 |

| | Wage Assignments | Other Security | Totals | |
|------------------------------|---------------------|-------------------|---------|--|
| Total # of Charge-Offs | 0 | 378 | 85,950 | |
| Total # of Loans Outstanding | 0 | 6,336 | 272,123 | |
| Current Loans | 0 | 5,732 | 220,224 | |
| 1 Payment Past Due | 0 | 351 | 23,988 | |
| 2 Payments Past Due | 0 | 78 | 8,442 | |
| 3 or More Payments Past Due | 0 | 175 | 19,469 | |

Exhibit I (continued) California Finance Lenders Default Rate by Security Type and Size of Loan As of December 31, 2020

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

| | Unsecured | Personal Property | Automobiles & Other Motor Vehicles | Auto Title Loans |
|------------------------------|-----------|----------------------|--|---------------------|
| Total # of Charge-Offs | 26,986 | 970 | 1,410 | 1,289 |
| Total # of Loans Outstanding | 250,107 | 17,321 | 22,844 | 9,752 |
| Current Loans | 208,925 | 16,895 | 21,141 | 8,028 |
| 1 Payment Past Due | 22,192 | 94 | 963 | 1,104 |
| 2 Payments Past Due | 6,428 | 99 | 259 | 271 |
| 3 or More Payments Past Due | 12,562 | 233 | 481 | 349 |

| | Wage Assignments | Real Property | Other Security | Totals |
|------------------------------|---------------------|---------------|----------------|---------|
| Total # of Charge-Offs | 0 | 2 | 8 | 30,665 |
| Total # of Loans Outstanding | 0 | 1,552 | 231 | 301,807 |
| Current Loans | 0 | 1,493 | 200 | 256,682 |
| 1 Payment Past Due | 0 | 0 | 7 | 24,360 |
| 2 Payments Past Due | 0 | 27 | 5 | 7,089 |
| 3 or More Payments Past Due | 0 | 32 | 19 | 13,676 |

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

| | Unsecured | Personal Property | Automobiles & Other Motor Vehicles | Auto Title Loans |
|------------------------------|-----------|----------------------|--|---------------------|
| Total # of Charge-Offs | 4,414 | 3,159 | 7,003 | 233 |
| Total # of Loans Outstanding | 103,384 | 113,117 | 191,725 | 1,972 |
| Current Loans | 100,202 | 111,726 | 184,076 | 1,587 |
| 1 Payment Past Due | 1,611 | 730 | 4,604 | 234 |
| 2 Payments Past Due | 531 | 317 | 1,539 | 59 |
| 3 or More Payments Past Due | 1,040 | 344 | 1,506 | 92 |

| | Wage Assignments | Real Property | Other Security | Totals |
|------------------------------|---------------------|---------------|----------------|-----------|
| Total # of Charge-Offs | 0 | 34 | 32 | 14,875 |
| Total # of Loans Outstanding | 0 | 1,838,105 | 37,262 | 2,285,565 |
| Current Loans | 0 | 1,820,013 | 35,347 | 2,252,951 |
| 1 Payment Past Due | 0 | 867 | 194 | 8,240 |
| 2 Payments Past Due | 0 | 4,111 | 404 | 6,961 |
| 3 or More Payments Past Due | 0 | 13,114 | 1,317 | 17,413 |

Exhibit J California Finance Lenders Loans Made Online by Type of Security Calendar Year 2020 (\$ in thousands)

Table 13: Loans Made Online

| Total Number of CFL Licensees | Making Loans | | 1,525 | |
|------------------------------------|--------------------|--|------------------|--|
| Total Number of CFL Licensees | | ns | 127 | |
| % of CFL Licensees Making Onli | • | | 8.33% | |
| | | | | |
| Aggregate Principal Amount of A | | | 272,580,617 | |
| Aggregate Principal Amount of C | Inline CFL Loans M | lade \$ | 16,902,535 | |
| % of Online CFL Loans Made | | | 6.20% | _ |
| Type of Security | Number of Loans | % of Total Number to All CFL Consumer Number | Principal Amount | % of Total Amount to All CFL Consumer Amount |
| CONSUMER LOANS | | | | |
| Unsecured (Under \$2,500) | 11,068,317 | 98.59 | \$1,230,630 | 8.50 |
| Unsecured (\$2,500 and Above) | 89,580 | 0.80 | \$1,887,279 | 13.03 |
| Personal Property | 14,551 | 0.13 | \$483,401 | 3.34 |
| Automobiles & Other Motor Vehicles | 6,070 | 0.05 | \$114,806 | 0.79 |
| Auto Title Loans | 4,395 | 0.04 | \$22,534 | 0.16 |
| Wage Assignments | 0 | 0.00 | \$0 | 0.00 |
| Real Property | 29,081 | 0.26 | \$10,723,331 | 74.06 |
| Other Security | 14,405 | 0.13 | \$17,193 | 0.12 |
| Total Consumer Loans Made | 11,229,689 | 100.00 | \$14,479,174 | 100.00 |
| | | % of Total Number to All CFL | | % of Total Amount to All CFL |
| Type of Security | Number of Loans | Commercial Number | Principal Amount | Commercial Amount |
| COMMERCIAL LOANS | | | | |
| Unsecured | 16,230 | 45.06 | \$632,814 | 26.11 |
| Personal Property | 2,295 | 6.37 | \$204,062 | 8.42 |
| Automobiles & Other Motor Vehicles | 3,643 | 10.11 | \$18,304 | 0.76 |
| Business Equipment | 403 | 1.12 | \$109,191 | 4.51 |
| Real Property | 1,964 | 5.45 | \$817,939 | 33.75 |
| Other Security | 11,481 | 31.88 | \$641,051 | 26.45 |
| Total Commercial Loans Made | 36,016 | 100.00 | \$2,423,361 | 100.00 |

Exhibit K (Revised January 2022) Property Assessed Clean Energy (PACE) Program Key Findings Calendar Year 2020

With the signing of AB 1284 in October 2017, a licensing scheme was set forth for Property Assessed Clean Energy (PACE) program administrators. 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.

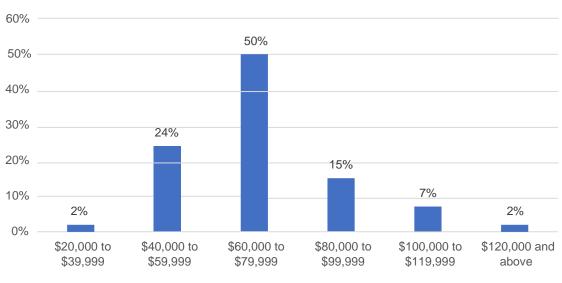
As of December 31, 2020, the five licensed PACE program administrators have enrolled 4,513 PACE solicitors and 13,099 PACE solicitor agents.

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

Key Findings

- PACE program administrators reported gross income of \$43,478,875 from PACE program assessment financing in 2020, **representing a 30 percent decrease since 2019**.
- The total amount of assessment contracts funded by PACE program administrators was \$332,517,305, representing a decrease of 8 percent since 2019.
- The total number of PACE assessment contracts funded and originated in 2020 was 10,129, representing an 18 percent decrease since 2019.
- In 2020, the aggregated total fees and other charges assessed to property owners, including interest, was \$82,549,973, representing a decrease of 1 percent since 2019.
- A total of 231 PACE assessment contracts were canceled by consumers within three days of executions in 2020, representing a decrease of 61 percent since 2019.
- A total of <u>3,218 PACE assessments</u> were funded for HVAC systems, boilers, or other temperature regulation systems not in the case of emergency or immediate necessity, **representing an increase of 66 percent since 2019**.
- PACE program administrators reported making a total of six PACE assessments involving a case of emergency or immediate necessity under Financial Code section 22687 subdivision (e), meaning the program administrator did not determine and consider the current and reasonably expected income or assets of the property owner in accordance with Financial Code section 22687, subdivision (b), **representing a decrease of 74 percent since 2019**.

- The reported estimated amount of greenhouse gas emissions reductions in 2020 was 188,688 metric tons (MT), representing 32 percent less reductions than reported in 2019.
- Of the 10,129 PACE assessments funded in 2020, **50 percent were to residents with median** household income between \$60,000 to \$79,999.



PACE Assessments Funded in 2020

Median Household Income

Median household income data is based on the United States Census Bureau median household income from 2015 - 2019.

- The number of jobs created during 2020 was estimated to be 3,310.
- The program administrators provided the number of energy and water saving improvement products installed during 2020. However, not all the program administrators tracked the overall average efficiency rating, and whether these installed energy and water saving improvement products qualified for Energy Star program.
- Detail information required under S&H Code section 5954 is available by <u>city</u>, by <u>county</u>, and by ZIP code.

Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Licensing Data Calendar Year 2020

PROGRAM ADMINISTRATOR LICENSING DATA

The table below shows the number of licensed PACE program administrators as of December 31, 2020. The table also includes the number of enrolled PACE solicitors and enrolled PACE solicitor agents at the calendar year end.

During 2020, a PACE program administrator exited PACE business and ceased all PACE financings. However, the PACE program administrator's CFL license remained active as of December 31, 2020.

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

| | 2019 | 2020 |
|---|--------|--------|
| Number of Licensed Program Administrators as of December 31 | 5 | 5 |
| Number of Program Administrators License Surrendered | 0 | 0 |
| Number of Program Administrators License Revoked | 0 | 0 |
| Number of Licensed Program Administrators as of December 31 | 5 | 5 |
| Number of Enrolled PACE Solicitors at December 31 | 6,443 | 4,513 |
| Number of Enrolled PACE Solicitor Agents at December 31 | 51,095 | 13,099 |

Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Violations Found During Examinations Calendar Year 2020

VIOLATIONS FOUND DURING EXAMINATIONS

PACE program administrators are subject to an 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, 2020 through December 31, 2020. 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 program's regulations. In 2020, the DFPI conducted two regulatory examinations of the five program licensees.

| Violation Description | CFL Section | S&H | 2019 | 2020 |
|--|------------------------|-------------------------------|------|------|
| Making consumer loans without being licensed as finance lender or broker | 22100(a) & 22689(c) | 5898.18 | 1 | 0 |
| Failure to update principal officers | 22105 | | 0 | 1 |
| Provided false and misleading dealer fee disclosure | 22161 & 22689(c) | 5923(c) & 5926 | 0 | 2 |
| Provided false and misleading post funding inspection finding | 22161(a) | | 0 | 1 |
| Provided false and misleading information to the property owner | 22161(a)(2) | | 1 | |
| Failure to offer fee advertised to the property owner | 22161(a)(3) | | 1 | |
| Failure to disclose licensing authority | 22162(b) | | 0 | 1 |
| Failure to report PACE solicitor as enrolled | 22680(a) | | 1 | |
| Engaged in the business with PACE solicitor not reported as enrolled | 22680(d) | | 1 | 2 |
| Improper enrollment of PACE Solicitor Agent who did not maintain the required minimum qualifications | 22680(e) & (g) | | 0 | 1 |
| Failure to provide proof that PACE solicitor agents have completed and passed the test of the introductory training | 22681(b) | | 1 | |
| Inadequate policies and procedures in responding to consumer complaints | 22683 | | 0 | 2 |
| Approving ineligible home improvement contracts | 22684 (a)(b) | | 0 | 1 |
| The term of the PACE assessment contract exceeded the estimated useful life of the measure attributed to greatest portion of funds | 22684(j) | | 1 | |
| Failure to utilize at least three automated valuation models | 22685(a)(1) | | 1 | 2 |
| Failure to disclose property market value | 22685(b) | | 0 | 1 |
| Failure to verify whether the assessment contract was executed prior to work commencement | 22686 | | 2 | 2 |
| Failure to determine that property owner has an ability to repay the annual PACE assessment payment | 22686 & 22687 | | 2 | 2 |
| Emergency waiver of ability to repay requirements granted for ineligible agreements | 22687 | | 0 | 2 |
| Failure to obtain monthly household expense information from property owner | 22687(a)(1) | | 0 | 1 |
| Failure to confirm the amount and sources of property owner's income during the oral confirmation of key terms call | 22687(a)(6) | | 1 | 1 |
| Failure to verify that price of PACE finance project is not different from paid in cash price | 22689(c) | 5926 | 1 | 2 |
| Refinancing ineligible PACE assessment contract | 22689(c) | 5898.18 | 1 | |
| Disclosing the property owner's eligible amount of funds to the contractor | 22689(c) | 5925 | 1 | |
| No evidence that property owner agreed to receive electronic copy of document in lieu of printed copy | 22689(c) | 5898.16(b)(1) & 5898.17(a) | 2 | 2 |
| Failure to retain term confirmation call | 22689(c) | 5913(b)(3) | 0 | 1 |
| Failure to confirm the assessment contract and financing estimate and disclosure to all property owners | 22689(c) | 5902(g) & 5913 | 2 | 2 |

Table 15: Number and Type of Violations

Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Complaint Information Calendar Year 2020

COMPLAINT INFORMATION

In 2020, a total of 169 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.

Table 16: PACE Program Related Complaints

| | 2019 | 2020 |
|--|------|------|
| Total number of complaints received | 157 | 169 |
| Total number of complaints awaiting resolution | 53 | 12 |
| Total number of complaints resolved | 104 | 157 |

Table 17: Complaints by Complaint Reason

| | 2019 | 2020 |
|---|------|------|
| Administrative issue | 1 | 1 |
| Advertising issue | 0 | 2 |
| Fraud allegation | 4 | 16 |
| Identity theft allegation | 4 | 1 |
| Investment fraud allegation | 2 | 0 |
| Mishandled transaction | 14 | 7 |
| Omission or misrepresentation of facts in application | 4 | 3 |
| Overcharges | 0 | 3 |
| Payment dispute | 36 | 26 |
| Poor customer service | 0 | 6 |
| Unethical behavior or tactics | 70 | 80 |
| Other* | 22 | 24 |

*Other includes complaints that did not specify a program administrator, solicitor, or solicitor agent, and complaints that were not under the DFPI's jurisdiction.

Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Recommendations for Improving Program Calendar Year 2020

RECOMMENDATIONS FOR IMPROVING PROGRAM

The licensing and regulation of the PACE program by DFPI commenced on January 1, 2019. Currently, there are only five PACE program administrators licensed with DFPI.

In light of continued consumer complaints about solicitor acts resulting in consumer harm, the California DFPI in June 2021 moved to revoke the license of a PACE program administrator after finding that it had done little to prevent one of its solicitors from repeatedly defrauding homeowners. It was the first time the license of a program administrator had been revoked. As significant problems persist with solicitors, contractors, and administrators alike, the California DFPI will continue to utilize the tools we have available to protect homeowners from fraudulent actions and deceptive marketing tactics.

California homeowners experiencing problems with PACE have recourses if they're struggling to pay an assessment and are encouraged to file a complaint with our office. Homeowners can file a complaint online: https://dfpi.ca.gov/file-a-complaint/ or reach out to us 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: https://dfpi.ca.gov/pace-program-administrators/pace/.

LICENSING DATA

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 represent the aggregate totals for five PACE program administrators.

Table 18: Number and Aggregate Amount of Assessment Contracts Funded

| | 2019 | 2020 |
|--|---------------|---------------|
| Total number of PACE assessments | 12,335 | 10,129 |
| Aggregate amount of PACE assessment funded | \$362,347,433 | \$332,517,305 |
| Average amount of PACE assessment funded | \$29,376 | \$32,828 |

Table 19: Assessment Contract Term

| | 2019 | 2020 |
|--|-------|-------|
| Average term of assessment contract (in years) | 19.24 | 20.91 |

Table 20: Number of Assessment Contracts by Interest Rate by Year

| | 2019 | 2020 |
|------------------------|--------|--------|
| At or below 4.00% | 520 | 3,302 |
| 4.01% - 8.00% | 6,781 | 5,572 |
| 8.01% – 12.00% | 5,034 | 1,255 |
| 12.01% – 16.00% | 0 | 0 |
| 16.01% – 20.00% | 0 | 0 |
| Above 20% | 0 | 0 |
| Total PACE assessments | 12,335 | 10,129 |

Table 21: Number of Assessment Contracts by APR by Year

| | 2019 | 2020 |
|------------------------|--------|--------|
| At or below 4.00% | 330 | 83 |
| 4.01% - 8.00% | 4,064 | 5,047 |
| 8.01% - 12.00% | 7,899 | 3,590 |
| 12.01% – 16.00% | 42 | 1,409 |
| 16.01% – 20.00% | 0 | 0 |
| Above 20% | 0 | 0 |
| Total PACE assessments | 12,335 | 10,129 |

Table 22: Residential Property Data

| | 2019 | 2020 |
|---|---------|---------|
| Aggregated average market value of property encumbered by | 509,451 | 513,691 |
| mortgage-related PACE assessments | | |

Table 23: Delinquent PACE Assessments

| | 2019 | 2020 |
|-----------------------------------|-------------|-------------|
| Total delinquent amount | \$9,971,264 | \$7,548,474 |
| Average number of missed payments | 1.60 | 1.95 |

Total delinquencies, by city, by county, and by ZIP code.

Table 24: Defaulted PACE Assessments

| | 2019 | 2020 |
|------------------------------------|-------------|-------------|
| Total defaulted amount | \$5,034,107 | \$4,821,195 |
| Average number of missed payments | 3.50 | 4.20 |
| Total number of parcels defaulted | 760 | 617 |
| Average number of years in default | 1.56 | 1.71 |

Total defaulted amount, by city, by county, and by ZIP code.

Table 25: Foreclosure Actions (Year 2019)

| Number of Foreclosure Actions | ZIP Code | Year of Assessment Contract | Original Amount of the Assessment Contract | Amount Owed upon Foreclosure | Purchased Price Paid for Property at Auction | Amount Recovered |
|-------------------------------------|-------------|-----------------------------------|--|------------------------------------|---|---------------------|
| 1 | 93650 | 2017 | 16,888 | 0 | 335,000 | 0 |
| 1 | 94920 | 2016 | 43,787 | 4,262 | 717,129 | 4,262 |
| 2 | 95204 | 2016 | 24,192 | 0 | 0 | 0 |
| 1 | 95688 | 2016 | 51,505 | 0 | 363,000 | 0 |

| Table 26: | Foreclosure | Actions | (Year 2020) |
|-----------|-------------|---------|-------------|
| | | | |

| Number of Foreclosure Actions | ZIP Code | Year of Assessment Contract | Original Amount of the Assessment Contract | Amount Owed upon Foreclosure | Purchased Price Paid for Property at Auction | Amount Recovered |
|-------------------------------------|-------------|-----------------------------------|--|------------------------------------|---|---------------------|
| 0 | N/A | N/A | 0 | 0 | 0 | 0 |

| Table 27: Number of PACE Assessments and Mortgage-Related Debt at the time | е |
|--|---|
| the Assessment Contract was Entered | |

| | 2019 | 2020 |
|---|--------|--------|
| Above 97 percent cap on total PACE and mortgage-related debt | 0 | 33 |
| 95.00 – 97.00 percent cap on total PACE and mortgage-related debt | 871 | 829 |
| 90.10 – 94.99 percent cap on total PACE and mortgage-related debt | 1,165 | 978 |
| 87.10 – 90.00 percent cap on total PACE and mortgage-related debt | 674 | 552 |
| 85.10 – 87.00 percent cap on total PACE and mortgage-related debt | 403 | 334 |
| 82.00 – 85.00 percent cap on total PACE and mortgage-related debt | 634 | 565 |
| Below 82 percent cap on total PACE and mortgage-related debt | 8,588 | 6,838 |
| Total PACE assessments | 12,335 | 10,129 |

 Table 28: Number of Delinquent PACE Assessments and Mortgage-Related Debt at the time the Assessment Contract was Entered

| | 2019* | 2020 |
|---|-------|------|
| Above 97 percent cap on total PACE and mortgage-related debt | N/A | 14 |
| 95.00 – 97.00 percent cap on total PACE and mortgage-related debt | N/A | 11 |
| 90.10 – 94.99 percent cap on total PACE and mortgage-related debt | N/A | 24 |
| 87.10 – 90.00 percent cap on total PACE and mortgage-related debt | N/A | 16 |
| 85.10 – 87.00 percent cap on total PACE and mortgage-related debt | N/A | 12 |
| 82.00 – 85.00 percent cap on total PACE and mortgage-related debt | N/A | 16 |
| Below 82 percent cap on total PACE and mortgage-related debt | N/A | 796 |
| Total PACE assessments | N/A | 889 |

*The delinquencies required 2018 and earlier data, which CFL Program did not have oversight in 2018 or before. Therefore, this data was not collected in 2019.

Table 29: Method of Determining the Market Value of the Property

| | 2019 | 2020 |
|---------------------------------|--------|--------|
| Automated valuation model | 11,351 | 9,359 |
| Appraisal | 984 | 770 |
| Property valuation not obtained | 0 | 0 |
| Total PACE assessments | 12,335 | 10,129 |

Table 30: Residual Income of the Property Owners

| | 2019 | 2020 |
|---|---------|---------|
| Average monthly residual income of the property owners upon | \$3,194 | \$3,552 |
| entering into theassessment contract | | |

Table 31: PACE Assessments Funded Under Emergency Procedures in Financial Code section 22687(e)

| | 2019 | | 2020 | |
|---|---------------------------|-----------------|---------------------------|-----------------|
| Type of Improvement | Number of Improvements | Average Cost | Number of Improvements | Average Cost |
| Central air conditioner emergency HVAC | 13 | \$12,028 | 1 | \$12,805 |
| Central air conditioner emergency, furnace emergency HVAC | 5 | \$12,073 | 0 | \$0 |
| Cool roof | 1 | \$4,000 | 0 | \$0 |
| Duct replacement emergency HVAC | 1 | \$14,281 | 0 | \$0 |
| Electric tankless water heater | 1 | \$7,995 | 0 | \$0 |
| Energy efficient | 1 | \$15,830 | 39 | \$18,211 |
| Energy Star windows | 0 | \$0 | 1 | \$9,500 |
| Furnace emergency HVAC | 9 | \$10,839 | 0 | \$0 |
| Heating and air conditioning package unit emergency HVAC | 1 | \$13,564 | 2 | \$8,567 |
| High performance roofing | 0 | \$0 | 1 | \$14,871 |
| High-efficiency HVAC | 2 | \$14,273 | 0 | \$0 |
| HVAC | 0 | \$0 | 1 | \$7,700 |
| Water conservation | 27 | \$13,672 | 2 | \$2,054 |
| Water delivery systems | 2 | \$7,930 | 0 | \$0 |
| Total Improvements | 61 | | 47 | |
| Total PACE Assessments Funded Under Emergency Procedures in Financial Code section 22687(e) | 55* | | 45* | |

*A PACE assessment may include multiple improvements.



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