

2022

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







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#### **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 82 million consumer loans in 2022, a 196.5 percent increase over 2021. The total principal amount of loans made in 2022 decreased by 48.8 percent in comparison to 2021 from \$145.4 billion to \$74.5 billion.
- Finance lenders originated 102,206 consumer loans secured by real property in 2022, a 67.7 percent decrease from the 316,579 originated in 2021. The total principal amount of consumer loans made in 2022 decreased by 65.7 percent in comparison to 2021 from \$132.9 billion to \$45.6 billion.
- Finance lenders originated more than 80.9 million "buy now, pay later" unsecured consumer loans in 2022, a 204.9 percent increase over 2021. The total principal amount of buy now pay later loans increased by 198.2 percent in comparison to 2021 from \$3.4 billion to \$10.3 billion. In 2021, finance lenders originated more than 26.5 million buy now pay later unsecured consumer loans, a 142.9 percent increase over 2020. The total principal amount of buy now pay later loans increased by 195.4 percent in comparison to 2020 from \$1.2 billion to \$3.4 billion.
- The total number of consumer loans excluding loans secured by real estate and "buy now, pay later" loans was 1,279,454 with a total principal amount of \$18.6 billion.
- 23.3 million online consumer loans were originated in 2022, a 13.5 percent decrease from the 26.9 million originated in 2021. The total principal amount of online loans decreased by 51.3 percent over the same period, from \$31.7 billion to \$15.4 billion.

#### **Key Findings: Commercial Loans and PACE**

- The number of commercial loans originated in 2022 decreased by 7.6 percent to 704,325 compared to 762,253 in 2021. The total principal amount of commercial loans decreased by 16.3 percent over the same period, from \$214.2 billion to \$179.3 billion.
- The number of online commercial loans originated in 2022 increased by 18.6 percent to 43,999 up from 37,110 in 2021. The total principal amount of online loans increased by 26.5 percent over the same period, from \$3.4 billion to \$4.3 billion.
- Exhibit K of this report contains PACE financing and PACE program administrator activity, which includes adopted regulations (Cal. Code Regs., tit.10, § 1620.01 et seq.) in effect since October 1, 2021.

#### **BACKGROUND**

The California Financing Law (CFL) requires the licensing and regulation of 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 licensees to file annual reports with the Commissioner of the Department of Financial Protection and Innovation (DFPI) 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, 2022. 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, 2022, the DFPI licensed 4,459 lenders, brokers, lenders and brokers, and PACE program administrators. Of these licensees, 4,228 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 dfpi.ca.gov/california-financing-law-publications.

#### 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.

Table 1: Licensing Data

Year	Number of Licensed Companies	Number of Licensed Locations	Number of Applications for New Licenses
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
2013	2,155	4,776	1,191

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

Table 2: Loan Details

#### Average Size of Loans Made

	Number of	_		_			
	Loans	F	Principal Amount of	Consumer	(	Commercial	
Year	Made		Loans Made	Loans		Loans	All Loans
2022	83,014,809	\$	253,791,285,459	\$ 905	\$	254,532	\$ 3,057
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
2013	2,171,948	\$	174,302,457,184	\$ 43,521	\$	106,650	\$ 80,252

<sup>\*</sup>Variances from data published in the annual report due to late filings by licensees.

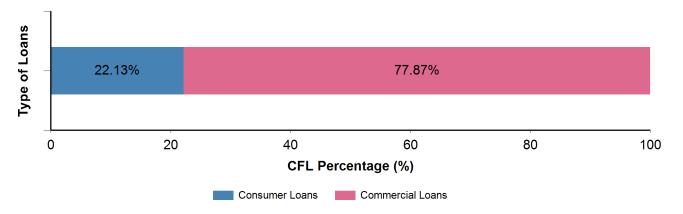
#### Exhibit A California Financing Law Licensees Consolidated Balance Sheet For the Year Ended December 31, 2022 (\$ in thousands)

<u>ASSETS</u>	Ag	gregate Balance	% of Total Assets
Cash	\$	108,827,425	3.53
Investments	<b>T</b>	339,314,450	11.01
California Finance Lenders Loan Receivables		202,099,035	6.56
Other Receivables		1,256,114,280	40.76
Reserves and Withholdings by Banks and Finance Companies		5,446,398	0.18
Real and Personal Property (Net)		116,084,312	3.77
Prepaid Expenses and Deferred Charges		8,620,182	0.28
Commissions Receivables		2,191,154	0.07
Other Assets		1,042,936,539	33.84
Total Assets	\$	3,081,633,775	100.00
LIABILITIES AND NET WORTH			% of Total Liabilities and Net Worth
Loans and Notes Payable from Third Parties	\$	580,720,335.00	18.84
Loans and Notes Payable from Parent Companies, Affiliates, etc.		403,663,809	13.1
Bonds, Debentures, and Certificates of Indebtedness		431,702,270	14.01
Accounts Payable		222,423,735	7.22
Dealers' Reserves and Withholds		1,349,340	0.04
Accrued Taxes Other Than Income Tax		2,613,863	0.08
Reserve for Income Taxes		26,999,589	0.88
Credit Insurance Premiums Due Insurer		1,313,640	0.04
Other Liabilities and Accruals		790,358,953	25.65
Total Liabilities		2,461,145,534	79.86
Net Worth		620,488,241	20.14
Total Liabilities and Net Worth	\$	3,081,633,775	100.00

#### Exhibit B California Finance Lenders Analysis of Loans and Receivables Outstanding For the Year Ended December 31, 2022 (\$ in thousands)

CALIFORNIA FINANCE LENDERS LOAN RECEIVABLES	Agg	% of Subtotal	
Consumer Loans	\$	45,938,135	22.13
Commercial Loans		161,661,935	77.87
Subtotal	\$	207,600,070	100.00
Less: Unearned Pre-Computed Charges		1,543,717	
Allowance for Bad Debts		3,957,319	
Net California Finance Lenders Loan Receivables	\$	202,099,034	
OTHER RECEIVABLES			
Sales Contracts	\$	383,972,405	29.76
Leases (True Leases)		127,005,538	9.84
Factoring		8,408,626	0.65
Other		770,787,350	59.74
Subtotal	\$	1,290,173,919	100.00
Less: Unearned Pre-Computed Charges		11,376,999	
Allowance for Bad Debts		22,682,641	
Net California Finance Lenders Loan Receivables	\$	1,256,114,279	

#### **Composition of CFL Loan Receivables**



### Exhibit C California Financing Law Licensees Statement of Income and Expenses For the Year Ended December 31, 2022 (\$ in thousands)

<u>INCOME</u>	 Aggregate Balance	% of Total Income
Gross Income of California Financing Law Licensees from Loans Made and Brokered Loans Gross Income from All Other Businesses and Sources	\$ 19,682,545 366,568,917	5.10 94.90
Total Gross Income	\$ 386,251,462	100.00
<u>EXPENSES</u>		
Loss on Loans Receivable Professional Audit and Accounting Services Insurance and Bond Premiums Legal Services and Expenses Occupancy Expenses Provision for Bad Debt Allowance Salaries and Bonuses: Employees Salaries and Bonuses: Owners, Partners, Executives Depreciation License Fees and Taxes Telephone and Utilities Advertising and Promotions Other Expenses	\$ 7,912,757 971,344 694,702 1,254,334 3,199,659 8,355,173 38,932,608 2,661,368 20,815,827 904,609 592,595 8,356,682 209,212,581	2.05 0.25 0.18 0.32 0.83 2.16 10.08 0.69 5.39 0.23 0.15 2.16 54.16
Total Expenses Before Interest and Income Taxes	\$ 303,864,239	78.67
Income or Loss Before Interest and Income Taxes  Less: Interest Paid to Bona Fide Third Parties  Interest Paid to Parent Company, Affiliates Others	\$ 82,387,223 27,965,903	21.33 7.24
Interest Paid to Parent Company, Affiliates, Others Income or Loss Before Income Taxes	\$ 9,284,016 45,137,304	2.40 11.69
Less: Provision for Income Taxes	 6,442,629	1.67
Net Income or (Loss)	\$ 38,694,675	10.02

#### Exhibit D California Financing Law Licensees Analysis of Income Received For the Year Ended December 31, 2022 (\$ in thousands)

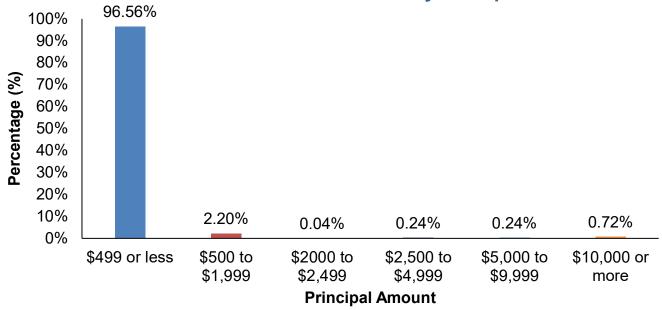
#### **CFL LOANS MADE AND CFL-BROKERED LOANS**

CONSUMER LOANS	Loans Under \$2,500		ans \$2,500 and Over	Total	
Charges Earned on Loans Collection from Charged-Off Accounts Income from Credit Insurance Other Insurance Commissions Administrative Fees Commissions from Loan Brokering Other Income	\$	109,042 2,648 12 0 13,287 14,907 165,609	\$ 3,536,441 35,998 3,535 5,970 216,302 401,060 1,236,446	\$	3,645,483 38,646 3,547 5,970 229,589 415,967 1,402,055
Income from Consumer Loans	\$	305,505	\$ 5,435,752	\$	5,741,257
COMMERCIAL LOANS					
Charges Earned on Loans Collection from Charged-Off Accounts Income from Credit Insurance Other Insurance Commissions Commissions from Loan Brokering Other Income				\$	12,585,608 27,933 250 1,767 196,309 1,129,420
Income from Commercial Loans				\$	13,941,287
Total Income from All Loans				\$	19,682,544
ALL OTHER BUSINESS AND SOURCES			 		
Charges Earned on Loans Other Interest or Return on Investments Collection from Charged-Off Accounts Income from Credit Insurance Other Insurance Commissions Other Income Relating to Loans				\$	139,428,007 12,926,695 3,735,217 20,648 751,706 209,706,645
Total Income from All Other Business and Sc	ources			\$	366,568,918

#### Exhibit E California Finance Lenders Loans Made or Refinanced by Principal Amount For the Year Ended December 31, 2022 (\$ in thousands)

Size of Loans	Number of Loans	% of Total Number	Principal Amount	% of Total Amount
CONSUMER LOANS				
\$ 499 or less	79,480,875	96.56	\$ 9,068,050	12.17
500 to 1,999	1,808,176	2.20	1,352,840	1.82
2,000 to 2,499	33,773	0.04	72,433	0.10
2,500 to 4,999	199,336	0.24	666,874	0.89
5,000 to 9,999	195,365	0.24	1,395,045	1.87
10,000 or more	592,959	0.72	61,962,737	83.15
Total Consumer Loans Made	82,310,484	100.00	\$ 74,517,977	100.00
COMMERCIAL LOANS				
\$5,000 or more	704,325	100.00	\$ 179,273,308	100.00
Total Commercial Loans Made	704,325	100.00	\$ 179,273,308	100.00
Total Loans Made, All Categories	83,014,809		\$ 253,791,285	

#### **Consumer Loans Made or Refinanced by Principal Amount**

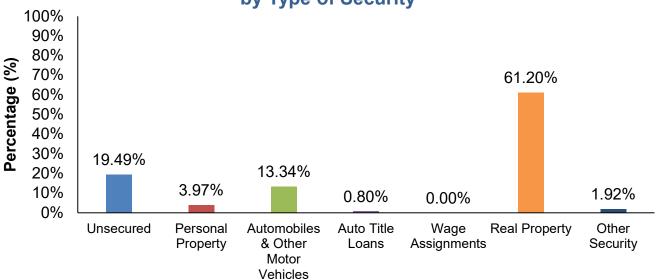


### Exhibit F California Finance Lenders Loans Made or Refinanced by Type of Security For the Year Ended December 31, 2022 (\$ in thousands)

Type of Security	Number of Loans	% of Total Number		Principal Amount	% of Total Amount
CONSUMER LOANS					
LOANS UNDER \$2,500					
Unsecured	81,269,947	99.93	\$	10,462,086	99.70
Personal Property Automobiles and Other Motor Vehicles	92 86	0.00 0.00		145 111	0.00 0.00
Auto Title Loans	50	0.00		65	0.00
Wage Assignments	0	0.00		0	0.00
Other Security	52,649	0.06		30,915	0.29
Total Loans Made	81,322,824	100.00	\$	10,493,322	100.00
LOANS OF \$2,500 TO \$4,999					
Unsecured	179,736	90.17	\$	597,128	89.54
Personal Property Automobiles and Other Motor Vehicles	1,222 6,440	0.61 3.23		3,748 24,094	0.56 3.61
Auto Title Loans	6,076	3.05		20,173	3.03
Wage Assignments	0	0.00		0	0.00
Other Security	5,862	2.94	_	21,731	3.26
Total Loans Made	199,336	100.00	\$	666,874	100.00
LOANS OF \$5,000 TO \$9,999					
Unsecured	170,067	87.05	\$	1,208,544	86.63
Personal Property Automobiles and Other Motor Vehicles	754 20,447	0.39 10.47		5,216 153,284	0.37 10.99
Auto Title Loans	3,856	1.97		26,280	1.88
Wage Assignments	0	0.00		0	0.00
Real Property	131	0.07		991 731	0.07
Other Security	110	0.06	_		0.05
Total Loans Made	195,365	100.00	\$	1,395,046	100.00
LOANS OF \$10,000 AND MORE					
Unsecured	86,449	14.58	\$	2,255,813	3.64
Personal Property Automobiles and Other Motor Vehicles	68,453 321,960	11.54 54.30		2,951,086 9,763,094	4.76 15.76
Auto Title Loans	321,900 649	0.11		10,760	0.02
Wage Assignments	0	0.00		0	0.00
Real Property	102,075	17.21		45,603,879	73.60
Other Security	13,373	2.26		1,378,106	2.22
Total Loans Made	592,959	100.00	\$	61,962,738	100.00
Total Consumer Loans Made	82,310,484		\$	74,517,980	

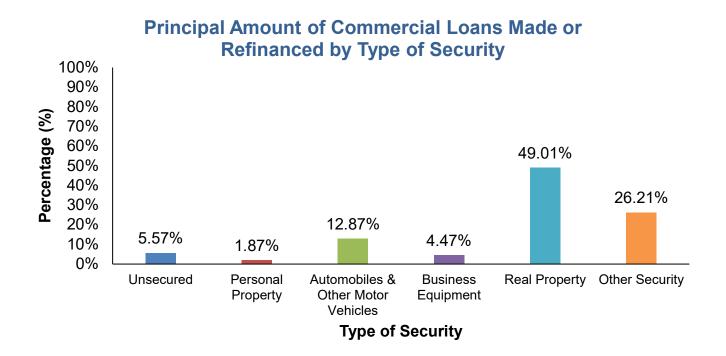
Type of Security	Number of Loans	% of Total Number	Pr	rincipal Amount	% of Total Amount
ALL CONSUMER LOANS					
Unsecured	81,706,199	99.27	\$	14,523,571	19.49
Personal Property	70,521	0.09		2,960,195	3.97
Automobiles and Other Motor Vehicles	348,933	0.42		9,940,583	13.34
Auto Title Loans	10,631	0.01		57,278	0.08
Wage Assignments	0	0.00		0	0.00
Real Property	102,206	0.12		45,604,870	61.20
Other Security	71,994	0.09		1,431,483	1.92
Total Consumer Loans Made	82,310,484	100.00	\$	74,517,980	100.00

#### Principal 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	76,601	10.88	\$	9,981,882	5.57
Personal Property	21,265	3.02	·	3,359,661	1.87
Automobiles and Other Motor Vehicles	452,024	64.18		23,067,006	12.87
Business Equipment	26,982	3.83		8,013,944	4.47
Real Property	44,806	6.36		87,857,937	49.01
Other Security	82,647	11.73		46,992,878	26.21
Total Commercial Loans Made	704,325	100.00	\$	179,273,308	100.00
Total Loans Made, All Categories	83,014,809		\$	253,791,288	



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	2,079		\$	3,147	
·	2,079		Ψ	5,147	
Alternate Rate: 1.6% per month Federal Reserve Bank Rate plus 10%	47 5			65 5	
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	80,977,951 25,411 86,862 15,293 149,918 66,257 1,025 7 39 61	99.58 0.03 0.11 0.02 0.18 0.08 0.00 0.00 0.00	\$	10,265,984 28,158 48,803 15,085 50,201 83,522 1,468 7 42 52	97.83 0.27 0.47 0.14 0.48 0.80 0.01 0.00 0.00
Total Loans Made	81,322,824	100.00	\$	10,493,322	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	11,453 15,238 4,850 6,951 9,809 147,550 3,454 1 0	5.75 7.64 2.43 3.49 4.92 74.02 1.73 0.00 0.00	\$	36,139 54,421 15,552 24,393 34,418 490,785 11,054 3 0	5.42 8.16 2.33 3.66 5.16 73.59 1.66 0.00 0.00
Total Loans Made	199,336	100.00	\$	666,875	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	6,725	3.44	\$	47,339	3.39
15.000 to 19.999 APR	5,793	2.97		39,165	2.81
20.000 to 24.999 APR	8,760	4.48		60,376	4.33
25.000 to 29.999 APR	6,298	3.22		45,619	3.27
30.000 to 34.999 APR	35,780	18.31		300,400	21.53
35.000 to 39.999 APR	131,568	67.34		899,736	64.50
40.000 to 69.999 APR	439	0.22		2,398	0.17
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	2	0.00		11_	0.00
Total Loans Made	195,365	100.00	\$	1,395,044	100.00
LOANS OF \$10,000 AND MORE					
Up to 14.999 APR	477,329	80.50	\$	56,410,112	91.04
15.000 to 19.999 APR	20,269	3.42	·	427,183	0.69
20.000 to 24.999 APR	16,199	2.73		267,233	0.43
25.000 to 29.999 APR	16,307	2.75		224,489	0.36
30.000 to 34.999 APR	25,246	4.26		320,670	0.52
35.000 to 39.999 APR	24,725	4.17		309,805	0.50
40.000 to 69.999 APR	483	0.08		6,444	0.01
70.000 to 99.999 APR	215	0.04		2,494	0.00
100.000 or More APR	79	0.01		26,942	0.04
Variable Rate	12,107	2.04		3,967,366	6.40
Total Loans Made	592,959	100.00	\$	61,962,738	100.00
Total Consumer Loans Made	82,310,484		\$	74,517,979	

Rate Charged	Number of Loans	% of Total Number	Principal Amount		% of Total Amount
COMMERCIAL LOANS					
Up to 14.999 APR	503,705	71.52	\$	127,279,813	71.00
15.000 to 19.999 APR	38,003	5.40		3,515,365	1.96
20.000 to 24.999 APR	6,454	0.92		537,514	0.30
25.000 to 29.999 APR	6,512	0.92		423,936	0.24
30.000 to 34.999 APR	6,798	0.97		272,690	0.15
35.000 to 39.999 APR	4,315	0.61		245,074	0.14
40.000 to 69.999 APR	12,988	1.84		596,999	0.33
70.000 to 99.999 APR	5,925	0.84		275,866	0.15
100.000 or More APR	3,804	0.54		1,830,134	1.02
Variable Rate	115,821	16.44		44,295,918	24.71
Total Loans Made	704,325	100.00	\$	179,273,309	100.00
Total Loans Made, All Categories	83,014,809		\$	253,791,287	

Rate Charged	Number of Loans	% of Total Number	Prin	icipal Amount	% of Total Amount
CONSUMER LOANS - UNSECURED					
LOANS UNDER \$2,500					
Step Rate:	0.040		•	0.44=	
2.5, 2, 1.5, 1% per month	2,018		\$	3,147	
Alternate Rate:					
1.6% per month	47			65	
Federal Reserve Bank Rate plus 10%	5			5	
Other Rates:					
Up to 14.999 APR	80,951,287	99.61	\$	10,259,522	98.06
15.000 to 19.999 APR	21,748	0.03	,	22,299	0.21
20.000 to 24.999 APR	64,412	0.08		29,984	0.29
25.000 to 29.999 APR	15,285	0.02		15,073	0.14
30.000 to 34.999 APR	149,918	0.18		50,201	0.48
35.000 to 39.999 APR	66,254	0.08		83,517	0.80
40.000 to 69.999 APR	1,025	0.00		1,468	0.01
70.000 to 99.999 APR	7	0.00		7	0.00
100.000 or More APR	0	0.00		0	0.00
Variable Rate	11_	0.00		15	0.00
Total Loans Made	81,269,947	100.00	\$	10,462,086	100.00
LOANS OF \$2,500 TO \$4,999					
Up to 14.999 APR	10,365	5.77	\$	32,047	5.37
15.000 to 19.999 APR	12,496	6.95		44,225	7.41
20.000 to 24.999 APR	3,701	2.06		11,999	2.01
25.000 to 29.999 APR	4,144	2.31		14,012	2.35
30.000 to 34.999 APR	8,451	4.70		29,223	4.89
35.000 to 39.999 APR	137,183	76.32		454,747	76.16
40.000 to 69.999 APR	3,390	1.89		10,854	1.82
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	6	0.00		20	0.00
Total Loans Made	179,736	100.00	\$	597,127	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	6,182	3.64	\$	43,173	3.57
15.000 to 19.999 APR	4,716	2.77		30,626	2.53
20.000 to 24.999 APR	5,427	3.19		34,541	2.86
25.000 to 29.999 APR	2,784	1.64		19,227	1.59
30.000 to 34.999 APR	30,229	17.77		258,156	21.36
35.000 to 39.999 APR	120,301	70.74		820,485	67.89
40.000 to 69.999 APR	426	0.25		2,323	0.19
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	2	0.00		11_	0.00
Total Loans Made	170,067	100.00	\$	1,208,542	100.00
LOANS OF \$10,000 AND MORE					
Up to 14.999 APR	32,322	37.39	\$	1,542,661	68.39
15.000 to 19.999 APR	6,811	7.88	Ψ	137,141	6.08
20.000 to 24.999 APR	4,337	5.02		60,032	2.66
25.000 to 29.999 APR	9,752	11.28		120,370	5.34
30.000 to 34.999 APR	14,705	17.01		162,752	7.21
35.000 to 39.999 APR	18,036	20.86		218,548	9.69
40.000 to 69.999 APR	223	0.26		2,501	0.11
70.000 to 99.999 APR	129	0.15		1,310	0.06
100.000 or More APR	0	0.00		0	0.00
Variable Rate	134	0.16		10,497	0.47
				10,107	0.11
Total Loans Made	86,449	100.00	\$	2,255,812	100.00
Total Consumer Loans Made	81,706,199		\$	14,523,567	

Rate Charged	Number of Loans	% of Total Number	Princi	oal Amount	% of Total Amount					
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						
Federal Reserve Bank Rate plus 10%	0			0						
Other Rates:										
Up to 14.999 APR	83	90.22	\$	138	95.83					
15.000 to 19.999 APR	3	3.26		5	3.47					
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	6	6.52		1_	0.69					
Total Loans Made	81,269,947	100.00	_\$	144	100.00					
LOANS OF \$2,500 TO \$4,999										
Up to 14.999 APR	125	10.23	\$	452	12.06					
15.000 to 19.999 APR	4	0.33		15	0.40					
20.000 to 24.999 APR	744	60.88		1,964	52.39					
25.000 to 29.999 APR	11	0.90		44	1.17					
30.000 to 34.999 APR	65	5.32		250	6.67					
35.000 to 39.999 APR	273	22.34		1,024	27.31					
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	1,222	100.00	\$	3,749	100.00					

Rate Charged	Number of Loans	% of Total Number	Principal Amount		% of Total Amount				
CONSUMER LOANS - PERSONAL PROPERTY (HOUSEHOLD ITEMS)									
LOANS OF \$5,000 TO \$9,999									
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	250	33.16		1,723	33.03				
25.000 to 29.999 APR	6	0.80		36	0.69				
30.000 to 34.999 APR	71	9.42		509	9.76				
35.000 to 39.999 APR	427	56.63		2,948	56.52				
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	754	100.00	\$	5,216	100.00				
LOANS OF \$10,000 AND MORE									
Up to 14.999 APR	67,391	98.45	\$	2,912,660	98.70				
15.000 to 19.999 APR	303	0.44	·	6,480	0.22				
20.000 to 24.999 APR	146	0.21		2,192	0.07				
25.000 to 29.999 APR	1	0.00		11	0.00				
30.000 to 34.999 APR	3	0.00		31	0.00				
35.000 to 39.999 APR	13	0.02		147	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	596	0.87		29,565	1.00				
Total Loans Made	68,453	100.00	\$	2,951,086	100.00				
Total Consumer Loans Made	70,521		\$	2,960,195					

Rate Charged	Number of Loans	% of Total Number	Princi	pal Amount	% of Total Amount					
CONSUMER LOANS - AUTOMOBILES AND OTHER MOTOR VEHICLES										
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	15	17.44	\$	21	18.92					
15.000 to 19.999 APR	3	3.49		6	5.41					
20.000 to 24.999 APR	61	70.93		74	66.67					
25.000 to 29.999 APR	7	8.14		10	9.01					
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	86_	100.00	\$	111	100.00					
LOANS OF \$2,500 TO \$4,999										
Up to 14.999 APR	45	0.70	\$	171	0.71					
15.000 to 19.999 APR	90	1.40		358	1.49					
20.000 to 24.999 APR	333	5.17		1,320	5.48					
25.000 to 29.999 APR	562	8.73		2,126	8.82					
30.000 to 34.999 APR	1,264	19.63		4,861	20.18					
35.000 to 39.999 APR	4,146	64.38		15,257	63.33					
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	6,440	100.00	\$	24,093	100.00					

Rate Charged	Number of Loans	% of Total Number	Principal Amount		% of Total Amount				
CONSUMER LOANS - AUTOMOBILES AND OTHER MOTOR VEHICLES									
LOANS OF \$5,000 TO \$9,999									
Up to 14.999 APR	352	1.72	\$	2,808	1.83				
15.000 to 19.999 APR	1,052	5.15		8,344	5.44				
20.000 to 24.999 APR	3,049	14.91		23,875	15.58				
25.000 to 29.999 APR	3,488	17.06		26,218	17.10				
30.000 to 34.999 APR	5,456	26.68		41,575	27.12				
35.000 to 39.999 APR	7,050	34.48		50,463	32.92				
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	20,447	100.00	\$	153,283	100.00				
LOANS OF \$40,000 AND MODE									
LOANS OF \$10,000 AND MORE Up to 14.999 APR	273,683	85.01	\$	0 000 004	91.46				
15.000 to 19.999 APR	13,103	4.07	Ф	8,928,924 281,893	2.89				
20.000 to 19.999 APR 20.000 to 24.999 APR	11,674	3.63		203,020	2.08				
25.000 to 24.999 APR 25.000 to 29.999 APR	6,539	2.03		103,775	1.06				
30.000 to 34.999 APR	10,500	3.26		157,222	1.61				
35.000 to 34.999 APR 35.000 to 39.999 APR	6,461	2.01		88,258	0.90				
40.000 to 69.999 APR	0,401	0.00		00,230	0.00				
70.000 to 99.999 APR	0	0.00		0	0.00				
100.000 to 99.999 APR 100.000 or More APR	0	0.00		0	0.00				
	0	0.00		_					
Variable Rate		0.00		0	0.00				
Total Loans Made	321,960	100.00	\$	9,763,092	100.00				
Total Consumer Loans Made	348,933		\$	9,940,579					

Rate Charged	Number of Loans	% of Total Number	Princi	pal 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:	0			0						
1.6% per month Federal Reserve Bank Rate plus	0			0						
10%	0			0						
Other Rates:										
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 25.000 to 29.999 APR	7	14.00 2.00		16 2	24.62 3.08					
30.000 to 34.999 APR	0	0.00		0	0.00					
35.000 to 39.999 APR	3	6.00		5	7.69					
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	39	78.00		42	64.62					
Variable Rate	0	0.00		0_	0.00					
Total Loans Made	50_	100.00	\$	65_	100.00					
LOANS OF \$2,500 TO \$4,999										
Up to 14.999 APR	2	0.03	\$	8	0.04					
15.000 to 19.999 APR	6	0.10		25	0.12					
20.000 to 24.999 APR	29	0.48		107	0.53					
25.000 to 29.999 APR	2	0.03		8	0.04					
30.000 to 34.999 APR	29	0.48		84	0.42					
35.000 to 39.999 APR	5,944	97.83		19,743	97.86					
40.000 to 69.999 APR 70.000 to 99.999 APR	63 1	1.04 0.02		197 3	0.98 0.01					
100.000 to 99.999 AFK	0	0.02		0	0.00					
Variable Rate	0	0.00		0	0.00					
Total Loans Made	6,076	100.00	\$	20,175	100.00					

Rate Charged	Number of Loans	% of Total Number	Principal Amount		% of Total Amount
CONSUMER LOANS - AUTO TITLE L	OANS				
LOANS OF \$5,000 TO \$9,999					
Up to 14.999 APR	11	0.29	\$	76	0.29
15.000 to 19.999 APR	8	0.21		62	0.24
20.000 to 24.999 APR	23	0.60		165	0.63
25.000 to 29.999 APR	9	0.23		64	0.24
30.000 to 34.999 APR	15	0.39		94	0.36
35.000 to 39.999 APR	3,778	97.98		25,751	97.99
40.000 to 69.999 APR	12	0.31		68	0.26
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	3,856	100.00	\$	26,280	100.00
LOANS OF \$10,000 AND MODE					
LOANS OF \$10,000 AND MORE Up to 14.999 APR	27	4.16	\$	1,345	12.50
15.000 to 19.999 APR	18	4.10 2.77	Φ	1,343 584	5.43
20.000 to 24.999 APR	8	1.23		178	5.43 1.65
25.000 to 24.999 APR 25.000 to 29.999 APR	10	1.23 1.54		261	2.43
	10			284	
30.000 to 34.999 APR 35.000 to 39.999 APR	12 194	1.85 29.89			2.64 23.73
				2,553	
40.000 to 69.999 APR	260	40.06		3,943	36.65
70.000 to 99.999 APR	86	13.25		1,184	11.01
100.000 or More APR	34	5.24		426	3.96
Variable Rate	0	0.00		0_	0.00
Total Loans Made	649_	100.00	\$	10,758	100.00
Total Consumer Loans Made	10,631		\$	57,278	

Rate Charged	Number of Loans	% of Total Number	Princip	oal Amount	% of Total Amount					
CONSUMER LOANS - WAGE ASSIGNMENT										
LOANS UNDER \$2,500										
Step Rate:	0		Φ.	0						
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:		0.00	•	•	0.00					
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 70.000 to 99.999 APR	0	0.00 0.00		0	0.00 0.00					
100.000 to 99.999 APR 100.000 or More APR	0 0	0.00		0 0	0.00					
Variable Rate	0	0.00		0	0.00					
valiable Nate		0.00		<u> </u>	0.00					
Total Loans Made	0	0.00	\$	0_	0.00					
LOANS OF \$2,500 TO \$4,999										
Up to 14.999 APR	0	0.00	\$	8	0.00					
15.000 to 19.999 APR	0	0.00	*	25	0.00					
20.000 to 24.999 APR	0	0.00		107	0.00					
25.000 to 29.999 APR	0	0.00		8	0.00					
30.000 to 34.999 APR	0	0.00		84	0.00					
35.000 to 39.999 APR	0	0.00		19,743	0.00					
40.000 to 69.999 APR	0	0.00		197	0.00					
70.000 to 99.999 APR	0	0.00		3	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 ASSIGN	NMENT			
LOANS OF \$5,000 TO \$9,999				
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
LOANS OF \$10,000 AND MORE				
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
Total Consumer Loans Made	0		\$ 0_	

Rate Charged	Number of Loans	% of Total Number	Principal Amount		% of Total Amount
CONSUMER LOANS - REAL PROPE	RTY				
LOANS OF \$5,000 TO \$9,999					
Up to 14.999 APR	131	100.00	\$	991	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	131	100.00	\$	991	100.00
LOANS OF \$10,000 AND MORE					
Up to 14.999 APR	90,885	89.04	\$	41,864,860	91.80
15.000 to 19.999 APR	11	0.01	Ψ	712	0.00
20.000 to 24.999 APR	16	0.02		1,445	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	45	0.04		26,515	0.06
Variable Rate	11,118	10.89		3,710,347	8.14
Total Loans Made	102,075	100.00	\$	45,603,879	100.00
Total Consumer Loans Made	102,206		\$	45,604,870	

Rate Charged	Number of % of Total Loans Number		Principal Amount		% of Total Amount
CONSUMER LOANS - OTHER SEC	URITIES				
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	26,566	50.46	\$	6,303	20.39
15.000 to 19.999 APR	3,657	6.95		5,848	18.92
20.000 to 24.999 APR	22,382	42.51		18,729	60.58
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	44	0.08		36	0.12
Total Loans Made	52,649	100.00	\$	30,916	100.00
LOANS OF \$2,500 TO \$4,999					
Up to 14.999 APR	916	15.63	\$	3,461	15.93
15.000 to 19.999 APR	2,642	45.07		9,799	45.09
20.000 to 24.999 APR	43	0.73		163	0.75
25.000 to 29.999 APR	2,232	38.08		8,203	37.75
30.000 to 34.999 APR	0	0.00		0	0.00
35.000 to 39.999 APR	4	0.07		13	0.06
40.000 to 69.999 APR	1	0.02		3	0.01
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	24_	0.41		89	0.41
Total Loans Made	5862	100.00	\$	21,731	100.00

Rate Charged	Number of Loans	% of Total Number	Principal Amount		% of Total Amount
CONSUMER LOANS - OTHER SECU	RITIES				
LOANS OF \$5,000 TO \$9,999					
Up to 14.999 APR	49	44.55	\$	291	39.81
15.000 to 19.999 APR	17	15.45		133	18.19
20.000 to 24.999 APR	11	10.00		71	9.71
25.000 to 29.999 APR	11	10.00		74	10.12
30.000 to 34.999 APR	9	8.18		66	9.03
35.000 to 39.999 APR	12	10.91		89	12.18
40.000 to 69.999 APR	1	0.91		7	0.96
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	110	100.00	\$	731	100.00
LOANS OF \$10,000 AND MORE					
Up to 14.999 APR	13,021	97.37	\$	1,159,662	84.15
15.000 to 19.999 APR	23	0.17		373	0.03
20.000 to 24.999 APR	18	0.13		365	0.03
25.000 to 29.999 APR	5	0.04		71	0.01
30.000 to 34.999 APR	26	0.19		380	0.03
35.000 to 39.999 APR	21	0.16		298	0.02
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	259_	1.94		216,957	15.74
Total Loans Made	13,373	100.00	\$	1,378,106	100.00
Total Consumer Loans Made	71,994		\$	1,431,484	

#### Exhibit H California Finance Lenders Schedule of Loan Activity For the Year Ended December 31, 2022 (\$ in thousands)

Table 3: Consumer Loans Serviced - Unsecured and Personal Property

	Unsecured			Personal Property		
	Number of Loans		Principal Amount	Number of Loans		Principal Amount
Loans Outstanding at Prior Year End 12/31/2021	5,758,156	\$	10,623,942	196,861	\$	5,697,105
Loans Outstanding at Year End 12/31/2022	46,777,576	\$	11,510,384	320,125	\$	13,492,347
Loans with One or More Past Due Payments Which are Past Due 30 or More Days at	4 000 000	•	400 500	0.040	•	405.000
12/31/2022	1,200,396	\$	460,508	3,643	\$	125,228

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

	Unsecured			Personal Property		
	Number of Loans		Principal Amount	Number of Loans		Principal Amount
Number of Loans Charged One or More Late Fees	5,411,849			19,258		
Total Late Fees Collected	4,497,739	\$	33,329	1,339	\$	22
Total Number of Repossessions Conducted	19			1		
Total Number of Loans Reinstated	416			0		
Total Number of Collateral Redeemed	0			0		
Total Collateral Sales Resulting in a Deficiency Balance	0	\$	0	0	\$	0
Total Collateral Sales Resulting in a Surplus Balance	0	\$	0	2	\$	71
Total Charge-Offs	6,783,305	\$	500,378	3,726	\$	97,844
Average Contracted Term of Loan (In Months)	55			138		

#### Exhibit H (continued) California Finance Lenders Schedule of Loan Activity For the Year Ended December 31, 2022 (\$ in thousands)

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

	Automob Other Moto			Auto Title Loans		
	Number of Loans		Principal Amount	Number of Loans		Principal Amount
Loans Outstanding at Prior Year End 12/31/2021	1,295,195	\$	21,801,005	42,083	\$	135,446
Loans Outstanding at Year End 12/31/2022	1,212,403	\$	21,099,180	16,067	\$	80,952
Loans with One or More Past Due Payments Which are Past Due 30 or More Days at 12/31/2022	34,495	¢	502,469	1,836	\$	7 965
12/31/2022	34,493	φ	502,409	1,030	Φ	7,865

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

	Automob Other Moto	r Ve	ehicles	Auto Title	e Lo	oans
	Number of Loans		Principal Amount	Number of Loans		Principal Amount
Number of Loans Charged One or More Late Fees	586,015			10,560		
Total Late Fees Collected	728,065	\$	20,973	15,610	\$	339
Total Number of Repossessions Conducted	22,844			2,681		
Total Number of Loans Reinstated	6,327			56		
Total Number of Collateral Redeemed	7,788			87		
Total Collateral Sales Resulting in a Deficiency Balance	4,688	\$	41,436	750	\$	2,047
Total Collateral Sales Resulting in a Surplus Balance	984	\$	4,227	15	\$	48
Total Charge-Offs	25,461	\$	121,919	2,239	\$	9,467
Average Contracted Term of Loan (In Months)	242			29		

#### Exhibit H (continued) California Finance Lenders Schedule of Loan Activity For the Year Ended December 31, 2022 (\$ in thousands)

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

	Real Pro		Other S	
	Number of Loans	Principal Amount	Number of Loans	Principal Amount
Loans Outstanding at Prior Year End 12/31/2021	17,216,660	\$ 128,737,340	0 51,000	\$ 9,991,048
Loans Outstanding at Year End 12/31/2022	23,029,615	\$ 124,392,869	9 66,277	\$ 2,215,597
Loans with One or More Past Due Payments Which are Past Due 30 or More Days at 12/31/2022	17,293	\$ 5,262,68	7 2,358,932	\$ 23,901

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

	Real Property			Other Security		
	Number of Loans	-	Principal Amount	Number of Loans		Principal Amount
Number of Loans Charged One or More Late Fees	52,965			4,998		
Total Late Fees Collected	20,068	\$	8,780	7,597	\$	291
Total Number of Foreclosures/ Repossessions Conducted	18		·	140		
Total Number of Loans Reinstated	3,780			2		
Total Number of Collateral Redeemed	40			6,300		
Total Collateral Sales Resulting in a Deficiency Balance	3	\$	817	66	\$	290
Total Collateral Sales Resulting in a Surplus Balance	67	\$	12,272	24	\$	237
Total Charge-Offs	25	\$	1,216	3,278	\$	3,355
Average Contracted Term of Loan (In Months)	258	·	·	130		

#### Exhibit I California Finance Lenders Default Rate by Security Type and Size of Loan For the Year Ended December 31, 2022

Table 9: Consumer Loans Under \$2,500

	Unsecured	Personal Property	Automobiles and Other Motor Vehicles	Auto Title Loans
Total # of Charge-Offs	6,644,998	296	904	1
Total # of Loans Outstanding	18,174,793	675	3,718	12
Current Loans	17,174,288	607	3,229	11
1 Payment Past Due	469,329	13	220	0
2 Payments Past Due	331,199	30	80	1
3 or More Payments Past Due	199,977	25	189	0

	Wage Assignments	Other Security	Total	
Total # of Charge-Offs	0	2,968	6,649,167	
Total # of Loans Outstanding	0	20,798	18,199,996	
Current Loans	0	13,489	17,191,624	
1 Payment Past Due	0	1,854	471,416	
2 Payments Past Due	0	342	331,652	
3 or More Payments Past Due	0	5,113	205,304	

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

	Unsecured	Personal Property	Automobiles and Other Motor Vehicles	Auto Title Loans
Total # of Charge-Offs	58,198	334	1,664	1,523
Total # of Loans Outstanding	297,257	1,915	21,120	9,362
Current Loans	246,634	1,845	18,158	7,894
1 Payment Past Due	19,116	34	1,029	585
2 Payments Past Due	8,059	14	546	205
3 or More Payments Past Due	23,448	22	1,387	678

	Wage Assignments	Other Security	Total	
Total # of Charge-Offs	0	271	61,990	
Total # of Loans Outstanding	0	5,205	334,859	
Current Loans	0	4,748	279,279	
1 Payment Past Due	0	268	21,032	
2 Payments Past Due	0	60	8,884	
3 or More Payments Past Due	0	129	25,664	

### Exhibit I (continued) California Finance Lenders Default Rate by Security Type and Size of Loan For the Year Ended December 31, 2022

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

	Unsecured	Personal Property	Automobiles and Other Motor Vehicles	Auto Title Loans
Total # of Charge-Offs	43,871	340	3,724	616
Total # of Loans Outstanding	312,953	6,418	38,781	5,482
Current Loans	259,014	6,183	33,684	4,900
1 Payment Past Due	26,280	114	2,105	302
2 Payments Past Due	8,369	61	913	99
3 or More Payments Past Due	19,290	60	2,079	181

	Wage Assignments	Real Property	Other Security	Total
Total # of Charge-Offs	0	5	11	48,567
Total # of Loans Outstanding	0	14,490	307	378,431
Current Loans	0	14,308	238	318,327
1 Payment Past Due	0	56	45	28,902
2 Payments Past Due	0	44	9	9,495
3 or More Payments Past Due	0	82	15	21,707

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

	Unsecured	Personal Property	Automobiles and Other Motor Vehicles	Auto Title Loans
Total # of Charge-Offs	36,238	2,756	19,169	99
Total # of Loans Outstanding	187,657	311,265	1,092,850	856
Current Loans	172,951	305,243	1,063,722	683
1 Payment Past Due	7,411	2,807	20,271	83
2 Payments Past Due	2,547	1,425	4,764	26
3 or More Payments Past Due	4,748	1,790	4,093	64

	Wage Assignments	Real Property	Other Security	Total
Total # of Charge-Offs	0	20	28	58,310
Total # of Loans Outstanding	0	111,272	43,404	1,747,304
Current Loans	0	108,863	42,085	1,693,547
1 Payment Past Due	0	1,103	191	31,866
2 Payments Past Due	0	361	317	9,440
3 or More Payments Past Due	0	945	811	12,451

# Exhibit J California Finance Lenders Loans Made Online by Type of Security For the Year Ended December 31, 2022 (\$ in thousands)

Table 13: Loans Made Online

Total Number of CFL Licensees Making Loans	1,672
Total Number of CFL Licensees Making Online Loans	157
% of CFL Licensees Making Online Loans	9.39%
Aggregate Principal Amount of All CFL Loans Made	\$ 253,791,285
Aggregate Principal Amount of Online CFL Loans Made	\$ 19,711,123
% of Online CFL Loans Made	7.77%

		% of Total Number to All CFL			% of Total Amount to All CFL
Type of Security	Number of Loans	Consumer Number		Principal Amount	Consumer Amount
CONSUMER LOANS					
Unsecured (Under \$2,500)	23,040,020	98.87	\$	3,110,342	20.14
Unsecured (\$2,500 and Above)	123,496	0.53		1,708,145	11.06
Personal Property	43,930	0.19		1,599,393	10.36
Automobiles and Other Motor Vehicles	10,476	0.04		198,588	1.29
Auto Title Loans	9,470	0.04		48,344	0.31
Wage Assignments	0	0.00		0	0.00
Real Property	20,717	0.09		8,174,381	52.93
Other Security	55,217	0.24		605,403	3.92
Total Consumer Loans Made	23,303,326	100.00	\$	15,444,596	100.00
		% of Total Number to All CFL			% of Total Amount to All CFL
Type of Security	Number of Loans	Consumer Number		Principal Amount	Consumer Amount
COMMERCIAL LOANS	Louis	Nambor		1 Tillopai 7 tilloant	7 tillount
Unsecured	8,125	18.47	\$	587,589	13.77
Personal Property	3,679	8.36	φ	585,707	13.77
Automobiles and Other Motor Vehicles	12,902	29.32		115,023	2.70
	1,759	4.00		287,941	6.75
Business Equipment Real Property	3,370	7.66		1,953,940	45.80
Other Security	14,164	32.19		736,327	45.80 17.26
Other Security	14,104	52.19		130,321	17.20
Total Commercial Loans Made	43,999	100.00	\$	4,266,527	100.00

### Exhibit K Property Assessed Clean Energy (PACE) Program Key Findings For the Year Ended December 31, 2022

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, 2022, there were four PACE program administrators licensed with the DFPI, one of which stopped originating PACE assessment contracts in the third quarter of 2022.

As of December 31, 2022, the four licensed PACE program administrators have enrolled 3,277 PACE solicitors and 19,168 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 \$42.0 million from PACE program assessment financing in 2022.
- The total number of PACE assessment contracts funded and originated by program administrators in 2022 was 3,721 for a total amount of \$138.9 million.
- In 2022, the aggregated total fees and other charges assessed to property owners, excluding interest, was \$16.1 million.
- A total of 274 PACE assessment contracts were canceled by consumers within three or five days
  of execution in 2022.
- 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>968 PACE assessments</u> were funded for HVAC systems, boilers, or other temperature regulation systems not involving an emergency or immediate necessity.
- PACE program administrators did not report any delinquent PACE assessments in 2022 involving a case of emergency or immediate necessity under Financial Code section 22687 subdivision (e). For financings 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 2022 was 57,762 metric tons (MT).
- The number of jobs created in 2022 was estimated to be 1,532.
- The program administrators provided the number of <u>energy</u> and <u>water</u> saving improvement products installed during 2022. 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, 2022. 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

	2020	2021	2022
Number of Licensed Program Administrators as of January 1	5	5	4
Number of Program Administrators License Surrendered	0	0	0
Number of Program Administrators License Revoked	0	1	0
Number of Licensed Program Administrators as of December 31	5	4	4
Number of Enrolled PACE Solicitors at December 31	4,513	3,499	3,277
Number of Enrolled PACE Solicitor Agents at December 31	13,099	18,145	19,168

### Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Program Violations Found During Examinations For the Year Ended December 31, 2022

### **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, 2020, through December 31, 2022. 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.

Table 15: Number and Type of Violations

	CFL Section	SHC Section	2020	2021	2022 <sup>1</sup>
Making consumer loans without being licensed as finance lender or broker	22100(a) and 22689(c)	5898.18	0	0	0
Failure to update principal officers	22105		1	1	0
Provided false and misleading dealer fee disclosure	22161 and 22689(c)	5923(c) and 5926	2	1	0
Provided false and misleading post funding inspection finding  Provided false and misleading information to the property owner	22161(a) 22161(a)(2)		1	0	
Failure to offer fee advertised to the property owner	22161(a)(2)		0	0	
Failure to disclose licensing authority	22162(b)		1	1	
Failure to report PACE solicitor as enrolled	22680(a)		0	1	
Engaged in the business with PACE solicitor not reported as enrolled	22680(d)		2	1	
Improper enrollment of PACE solicitor agent who did not maintain the required minimum qualifications	22680(e) and (g)		1	1	
Failure to provide proof that PACE solicitor agents have completed and passed the test of the introductory training	22681(b)		0	0	0
Inadequate policies and procedures in responding to consumer complaints	22683		2	1	
Approving ineligible home improvement contracts	22684 (a)(b)		1	1	_
Exceeded maximum amount financed allowed	22684(h)		0	1	0
The term of the PACE assessment contract exceeded the estimated useful life of the measure attributed to greatest portion of funds	22684(j)		0	1	0
Failure to utilize at least three automated valuation models	22 85(a)(1)		2	1	
Failure to disclose property market value	22685(b)		1	0	0
Failure to verify whether the assessment contract was executed prior to work commencement	22686		2	1	0
Failure to determine that property owner has an ability to repay the annual PACE assessment payment	22686 and 22687		2	0	0
Emergency waiver of ability to repay requirements granted for ineligible agreements	22687		2	1	0
Failure to obtain monthly household expense information from property owner	22687(a)(1)		1	1	0
Failure to confirm the amount and sources of property owner's income during the oral confirmation of key terms call	22687(a)(6)		1	0	0
Failure to verify that price of PACE finance project is not different from paid in cash price	22689(c)	5926	2	1	0
Refinancing ineligible PACE assessment contract	22689(c)		0	0	
Disclosing the property owner's eligible amount of funds to the contractor	22689(c)	5925	0	0	0

## Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Program Violations Found During Examinations For the Year Ended December 31, 2022

Table 15: Number and Type of Violations (continued)

	CFL Section	SHC Section	2020	2021	2022 <sup>1</sup>
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	1	0
Failure to inform property owner of annual administrative fee in confirmation terms call	22689(c)	5913(a)(2)	0	1	0
Failure to retain term confirmation call	22689(c)	5913(b)(3)	1	1	0
Failure to confirm the assessment contract and financing estimate and disclosure to all property owners	22689(c)	5902(g) and 5913	2	1	0
Failure to provide the Right to Cancel in required format	22689(c)	5898.16(b) (1)(A)	0	1	0

<sup>&</sup>lt;sup>1</sup> One PACE exam was started in 2022 and is still ongoing. No findings have been finalized for 2022 as of the date of this report.

### Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Complaint Information For the Year Ended December 31, 2022

### COMPLAINT INFORMATION

In 2022, a total of 75 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

	2020	2021	2022
Total number of complaints received	169	69	75
Total number of complaints awaiting resolution	12	2	1
Total number of complaints resolved	157	67	74

Table 17: Complaints by Complaint Reason

	2020	2021	2022
Administrative issue	1	0	1
Advertising issue	2	1	0
Fraud allegation	16	4	5
Identity theft allegation	1	0	0
Investment fraud allegation	0	0	0
Mishandled transaction	7	3	6
Omission or misrepresentation of facts in application	3	0	0
Overcharges	3	1	2
Payment dispute	26	13	12
Poor customer service	6	0	4
Unethical behavior or tactics	80	42	37
Other <sup>2</sup>	24	5	8

 $<sup>^2</sup>$  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.

### Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Complaint Information For the Year Ended December 31, 2022

### **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 <a href="mailto:dfpi.ca.gov/file-a-complaint/">dfpi.ca.gov/file-a-complaint/</a> 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: <a href="mailto:dfpi.ca.gov/pace-program-administrators/pace/">dfpi.ca.gov/pace-program-administrators/pace/</a>.

### **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

	2020	2021	2022
Total number of PACE assessments	10,129	5,651	3,721
Aggregate amount of PACE assessments funded	\$332,517,305	\$201,385,624	\$138,858,354
Average amount of PACE assessments funded	\$32,828	\$35,637	\$37,317

Table 19: Assessment Contract Term

	2020	2021	2022
Average term of assessment contract (in years)	20.91	22.58	23.38
Median term of assessment contract (in years)	NOT AVAILABLE <sup>3</sup>	25.00	25.00

Table 20: Residential Property Data

	2020	2021	2022
Aggregate average market value of property encumbered by mortgage-related PACE assessments	\$513,691	\$572,555	\$670,932
Aggregate median market value of property encumbered by mortgage-related and PACE assessments	NOT AVAILABLE <sup>3</sup>	\$507,740	\$568,000

Table 21: Number of Assessment Contracts by Interest Rate by Year

	2020	2021	2022
Up to 14.999%	10,129	5,651	3,720
15% - 19.999%	0	0	1
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	10,129	5,651	3,721

<sup>&</sup>lt;sup>3</sup> Median cannot be determined based on the data collected.

Table 22: Fees and Other Charges Excluding Interest

	2020	2021	2022
Total fees and other charges assessed to			
property owners not included in interest rate	\$ 82,549,973 \$	18,728,034 \$	16,087,849

### Table 23: Number of Assessment Contract Payments Received by Program Administrators from PACE Solicitors<sup>4</sup>

,							
	2020	2021	2022				
Buydown fee		126	85				
Contractor payment	NOT	511	305				
Seller's points	AVAILABLE	211	144				
Other payments		0	0				
Total		848	534				

Table 24: Amount of Payments Received by Program Administrators from PACE Solicitors<sup>4</sup>

	2020	2021	2022
Buydown fee		\$ 482,042	\$ 608,687
Contractor payment		\$ 2,289,348	\$ 2,031,842
Seller's points	NOT	\$ 788,696	\$ 746,129
Other payments	AVAILABLE	\$ 0	\$ 0
Aggregate amount of payments		\$ 3,560,086	\$ 3,386,658
Average amount of payments		\$ 4,198	\$ 6,342
Median amount of payments		\$ 3,381	\$ 4,826

Table 25: Method of Determining the Market Value of the Property

rable 201 Metrica of Botomining the Market Value of the Freporty								
	2020	2021	2022					
Automated valuation model	9,359							
Appraisal	770	NOT	NOT					
Property valuation not obtained	0	AVAILABLE <sup>5</sup>	AVAILABLE <sup>5</sup>					
Total PACE assessments	10,129							

### Table 26: Residual Income of the Property Owners

	2	2020	2021	2022
Average monthly residual income of property			NOT	NOT
owners upon entering into assessment contract	\$	3,552	AVAILABLE <sup>6</sup>	AVAILABLE <sup>6</sup>

<sup>&</sup>lt;sup>4</sup> Newly added table pursuant to the regulations adopted in 2021.

<sup>&</sup>lt;sup>5</sup> Pursuant to the regulations adopted in 2021, this data is currently only required for delinquent PACE assessments which is summarized in newly-added Table 30.

<sup>&</sup>lt;sup>6</sup> Pursuant to the regulations adopted in 2021, this data is currently only required for delinquent PACE assessments which is summarized in newly-added Table 31.

Table 27: Delinquent PACE Assessments

	2020	2021	2022
Total delinquent amount	\$ 7,548,474	\$ 8,240,635	\$ 5,781,432
Average number of missed payments	1.95	1.87	2.42

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

Table 28: Defaulted PACE Assessments

	2020	2021	2022
Total defaulted amount	\$ 4,821,195	\$ 2,445,762 \$	1,220,462
Average number of missed payments	4.20	3.67	5.02
Total number of parcels defaulted	617	288	181
Average number of years in default	1.71	1.61	2.46
Percentage of defaulted assessments	N/A	0.41%	0.36%

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

Table 29: Number of Delinquent PACE Assessments and Mortgage-Related Debt at Time Assessment Contract Was Entered

	2020	2021	2022
Above 97 percent cap on total PACE and mortgage-related debt	14	1	0
87.10 – 97.00 percent cap on total PACE and mortgage-related debt	51	85	14
Below 87 percent cap on total PACE and	824	375	102
mortgage-related debt  Total delinguent PACE assessments	889	461	192 206

Table 30: Method of Determining Market Value of Property for Delinquent PACE Assessments<sup>7</sup>

	2020	2021	2022
Automated valuation model		396	191
Appraisal	NOT	65	15
Property valuation not obtained	AVAILABLE	0	0
Total delinquent PACE assessments		461	206

Table 31: Residual Income of Property Owners for Delinquent PACE Assessments<sup>7</sup>

	2020	2021 <sup>8</sup>	2022
Average monthly residual income of property			
owners upon entering into assessment contract	NOT	\$5,149	\$5,621
Median monthly residual income of property	AVAILABLE		
owners upon entering into assessment contract		\$2,028	\$1,834

Table 32: Foreclosure Actions (Year 2020)

Ī				Origin	al						
	Number of		Year of	Amoun	t of	Aı	mount	Pur	chased Price		
F	oreclosure		Assessment	Assessn	nent	Owe	ed Upon	Paic	for Property	Amount	
	Actions	ZIP Code	Contract	Contra	ct	Fore	eclosure	6	at Auction	Recovered	
	0	N/A	N/A	\$	0	\$	0	\$	0	\$	0

Table 33: Foreclosure Actions (Year 2021)

Number of Foreclosure		Year of Assessment		Original Amount of ssessment	(	Amount Owed Upon		urchased Price aid for Property	<b>A</b>	4
Actions	ZIP Code	Contract	_	Contract		Foreclosure	Г	at Auction		ount 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 34: Foreclosure Actions (Year 2022)

	Original			,	,						
Number of		Year of	Amount of		Amount		Purchased Price				
Foreclosure		Assessment				Owed Upon		Paid for Property		Amount	
Actions	ZIP Code	Contract	Contract		For	eclosure	at Auction		Recovered		
1	90291	2020	\$	189,255	\$	52,818	\$	3,194,128	\$	52,818	
1	91605	2018	\$	94,349	\$	94,349	\$	766,513	\$	0	

<sup>&</sup>lt;sup>7</sup> Newly added table pursuant to the regulations adopted in 2021.

 $<sup>^{8}</sup>$  2021 data was revised to reflect the residual income of property owners on a monthly basis.

Table 35: PACE Assessments Funded Under Emergency Procedures in Financial Code section 22687(e)

			( )					
	2020		2021		2022			
	Number of	Average	Number of	Average	Number of	Average		
Type of Improvement	Improvements	Cost	Improvements	Cost	Improvements	Cost		
Central air conditioner	0	\$0	2	\$10,644	0	\$0		
Central air conditioner emergency HVAC	1	\$12,805	1	\$12,788	2	\$11,225		
Central air conditioner emergency, furnace								
emergency HVAC	0	\$0	0	\$0	0	\$0		
Cool roof	0	\$0	0	\$0	0	\$0		
Duct replacement emergency HVAC	0	\$0	0	\$0	0	\$0		
Electric tankless water heater	0	\$0	0	\$0	0	\$0		
Energy efficient	39	\$18,211	39	\$17,444	14	\$18,944		
Energy Star windows	1	\$9,500	0	\$0	0	\$0		
Furnace emergency HVAC	0	\$0	0	\$0	0	\$0		
Heating and air conditioning package unit								
emergency HVAC	2	\$8,567	0	\$0	0	\$0		
High performance roofing	1	\$14,871	0	\$0	0	\$0		
High-efficiency HVAC	0	\$0	0	\$0	0	\$0		
HVAC	1	\$7,700	0	\$0	0	\$0		
Renewable energy	0	\$0	2	\$29,850	0	\$0		
Water conservation	2	\$2,054	0	\$0	0	\$0		
Water delivery systems	0	\$0	0	\$0	0	\$0		
Total Improvements	47		44		16			
Total PACE Assessments Funded Under								
Emergency Procedures in Financial Code section 22687(e)	45 <sup>9</sup>		<u>42</u> 9		16 <sup>9</sup>			

<sup>&</sup>lt;sup>9</sup> A PACE assessment may include multiple improvements.



California Department of Financial Protection and Innovation

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