

2019

#### California Department of Business Oversight

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



#### Lourdes M. Castro Ramírez, Secretary Business, Consumer Services and Housing Agency

Manuel P. Alvarez
Commissioner of Business Oversight

Edgar L. Gill Jr., Senior Deputy Commissioner Division of Corporations

Mona Elsheikh, Deputy Commissioner Financial Services

#### **TABLE OF CONTENTS**

Executive Summary	1
Background	2
I. Historical Licensing Data	3
II. Analysis of Loans Made by CFL Licensees for the Last 10 Years	4
Exhibit A - Consolidated Balance Sheet	5
Exhibit B - Analysis of Loans and Receivables Outstanding	6
Exhibit C - Statement of Income and Expenses	7
Exhibit D - Analysis of Income Received	8
Exhibit E - Loans Made or Refinanced by Size	9
Exhibit F - Loans Made or Refinanced by Type of Security	10
Exhibit G - Loans Made or Refinanced by Rate Charged	13
Exhibit H - Schedule of Loan Activity by Security Type	29
Exhibit I - Default Rates by Security Type and Size of Loan	32
Exhibit J - Online Loan Information	34
Exhibit K - Property Assessed Clean Energy (PACE) Program	35

#### **EXECUTIVE SUMMARY**

The Department of Business Oversight 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 Business Oversight (DBO) 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.

Key findings of finance companies' activities in this report include:

- Finance lenders originated a total of 1,893,411 consumer loans in 2019, a 16.9 percent increase over 2018. The total principal amount of loans made in 2019 increased by 68.1 percent in comparison to 2018 (from \$34 billion to \$57 billion).
- The increase in the total aggregate principal loan amount was largely due to the increase in the number and principal amount of real estate secured loans funded in 2019.
- In 2019, the total principal amount of real estate secured loans funded was \$47.3 billion in comparison to \$23.9 billion in 2018, while the total number of loans funded increased to 120,519 in 2019 from 65,872 in 2018.
- Unsecured loans accounted for 79.5 percent of the total number of consumer loans made in 2019.
- Consumer loans with principal loan amount under \$2,500 accounted for 40.2 percent of the total number of consumer loans made in 2019. Unsecured loans made up 98.7 percent of loans with principal amount of less than \$2,500.
- The number of commercial loans originated in 2019 increased 6.6 percent to 905,341 from 849,161 in 2018, and the aggregate principal amount of such commercial loans increased 0.9 percent over the same period, to \$186.4 billion from \$184.7 billion from 2018.
- The number of consumer loans made online in 2019 increased 69.1 percent compared to 2018. The principal amount of such loans increased 134.0 percent in comparison to 2018. Unsecured consumer loans accounted for 95.1 percent of the total number and 23.9 percent of the aggregate principal amount of consumer loans made online.
- The number of commercial loans made online in 2019 increased by 102.2 percent and the principal loan amount of such loans increased by 61.5 percent compared to 2018.
- Beginning on page 36, the DBO is reporting PACE program financing activities for the first time pursuant to Financial Code Section 22692(b).

#### BACKGROUND

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

The CFL limits interest rates on consumer loans with principal loan amount under \$2,500 but does not cap interest rates on consumer loans of \$2,500 or higher.\*

Financial Code section 22159(a) states:

22159. (a) Each finance lender, broker, and program administrator licensee shall file an annual report with the commissioner, on or before March 15th, giving the relevant information that the commissioner reasonably requires concerning the business and operations conducted by the licensee or authorized by the program administrator licensee within the state during the preceding calendar year for each licensed place of business. The individual annual reports filed pursuant to this section shall be made available to the public for inspection except, upon request in the annual report to the commissioner, the balance sheet contained in the annual report of a sole proprietor or any other nonpublicly traded person. "Nonpublicly traded person" for purposes of this section means persons with securities owned by 35 or fewer individuals. The report shall be made under oath and in the form prescribed by the commissioner

#### Financial Code section 22160 states:

22160. The commissioner shall make and file annually with the Department of Business Oversight as a public record a composite of the annual reports and any comments on the reports that he or she deems to be in the public interest.

This report contains unaudited data provided by licensees for the calendar year ending December 31, 2019.

As of December 31, 2019, the DBO licensed 3,616 lenders and brokers. Of the 3,616 licensees, 3,401 filed their required annual reports. The DBO notified the non-filers of its intent to revoke their licenses.

As of December 31, 2019, the DBO licensed 5 PACE program administrators who enrolled 6,443 PACE solicitors and 51,095 PACE solicitor agents. All PACE program administrators filed their reports.

Data obtained from a small number of finance lender and broker licensees who filed annual reports after the aggregate report was compiled is not included. This omission does not materially affect the data 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 DBO's website at www.dbo.ca.gov.

\*Through December 2019, the CFL limited interest rates on consumer loans under \$2,500. 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. The data in this report entirely predates the effective date of AB 539.

#### 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 DBO 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
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
2010	2,261	4,327	1,022

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

Table 2: Loan Details

		D: : 1	Averag	e Size of Loans	Made
Year	Number of Loans Made	Principal Amount of Loans Made	Consumer Loans	Commercial Loans	All Loans
2019	2,798,752	\$ 243,390,103,234	\$ 30,110	\$ 205,867	\$ 86,964
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
2010	2,560,497	\$ 114,778,811,783	\$ 44,920	\$ 44,805	\$ 44,827

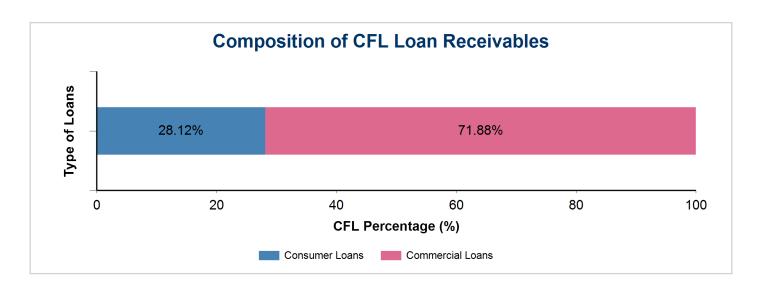
<sup>\*</sup>Variances from data published in the annual report due to late filings by licensees.

### Exhibit A California Financing Law Licensees Consolidated Balance Sheet As of December 31, 2019 (\$ in thousands)

<u>ASSETS</u>		% of Total Assets
Cash	\$ 69,917,576	2.92
Investments	245,943,063	10.26
California Finance Lenders Loan Receivables	167,904,683	7.00
Other Receivables	1,079,932,881	45.05
Reserves and Withholds by Banks and Finance Companies	4,711,902	0.20
Real and Personal Property (Net)	155,219,024	6.47
Prepaid Expenses and Deferred Charges	6,310,093	0.26
Commissions Receivables	962,775	0.04
Other Assets	 666,367,183	27.80
Total Assets	\$ 2,397,269,179	100.00
LIABILITIES AND NET WORTH		% of Total Liabilities and Net Worth
Loans and Notes Payable from Third Parties	\$ 476,402,556	19.87
Loans and Notes Payable from Parent Companies, Affiliates, etc.	347,376,340	14.49
Bonds, Debentures, and Certificates of Indebtedness	465,807,294	19.43
Accounts Payable	195,668,692	8.16
Dealers' Reserves and Withholds	870,584	0.04
Accrued Taxes Other Than Income Tax	1,622,801	0.07
Reserve for Income Taxes	37,674,962	1.57
Credit Insurance Premiums Due Insurer	614,770	0.03
Other Liabilities and Accruals	 433,334,542	18.08
Total Liabilities	1,959,372,541	81.73
Net Worth	437,896,638	18.27
Total Liabilities and Net Worth	\$ 2,397,269,179	100.00

### Exhibit B California Finance Lenders Analysis of Loans and Receivables Outstanding As of December 31, 2019 (\$ in thousands)

CALIFORNIA FINANCE LENDERS LOAN RECEIVABLES	Aggregate Balance	% of Subtotal
Consumer Loans	\$ 48,252,306	28.12
Commercial Loans	123,366,256	71.88
Subtotal	\$ 171,618,562	100.00
Less: Unearned Pre-computed Charges	754,027	
Allowance for Bad Debts	2,959,852	
Net California Finance Lenders Loan Receivables	\$ 167,904,683	
OTHER RECEIVABLES		
Sales Contracts	\$ 329,440,300	29.76
Leases (True Leases)	155,412,330	14.04
Factoring	9,931,135	0.90
Other	612,230,399	55.30
Subtotal	\$ 1,107,014,164	100.00
Less: Unearned Pre-computed Charges	15,731,922	
Allowance for Bad Debts	11,349,362	
Net California Finance Lenders Loan Receivables	\$ 1,079,932,880	



# Exhibit C California Financing Law Licensees Statement of Income and Expenses Calendar Year 2019 (\$ in thousands)

INCOME		% of Total Income
Gross Income of California Financing Law Licensees from Loans Made and Brokered Loans	\$ 16,853,648	3.07
Gross Income from All Other Businesses and Sources	532,043,592	96.93
Total Gross Income	\$ 548,897,240	100.00
<u>EXPENSES</u>		
Loss on Loans Receivable	\$ 4,280,208	0.78
Professional Audit and Accounting Services	846,322	0.15
Insurance and Bond Premiums	777,576	0.14
Legal Services and Expenses	1,258,114	0.23
Occupancy Expenses	2,950,118	0.54
Provision for Bad Debt Allowance	7,731,346	1.41
Salaries and Bonuses: Employees	31,567,166	5.75
Salaries and Bonuses: Owners, Partners, Executives	1,357,950	0.25
Depreciation	31,337,954	5.71
License Fees and Taxes	836,573	0.15
Telephone and Utilities	791,290	0.14
Advertising and Promotions	4,340,840	0.79
Other Expenses	374,003,471	68.14
Total Expenses Before Interest and Income Taxes	\$ 462,078,928	84.18
Income or Loss Before Interest and Income Taxes	\$ 86,818,312	15.82
Less: Interest Paid to Bona Fide Third Parties	30,179,822	5.50
Interest Paid to Parent Company, Affiliates and Others	10,606,265	1.93
Income or Loss Before Income Taxes	\$ 46,032,225	8.39
Less: Provision for Income Taxes	2,320,508	0.42
Net Income or (Loss)	\$ 43,711,717	7.96

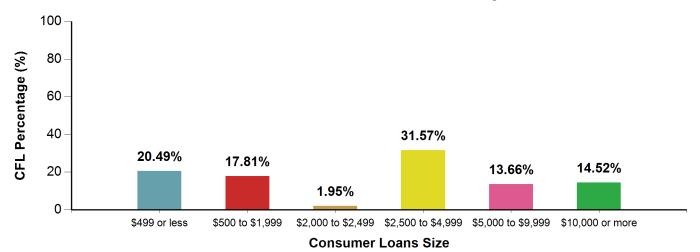
### Exhibit D California Financing Law Licensees Analysis of Income Received Calendar Year 2019 (\$ in thousands)

CFL LOANS MADE AND CFL-BROKERED LOANS		Loans Under \$2,500		Loans \$2,500 and Over	 Total
CONSUMER LOANS					
Charges Earned on Loans	\$	134,591	\$	4,771,388	\$ 4,905,979
Collection from Charged-Off Accounts		2,236		74,794	77,030
Income from Credit Insurance		14		2,332	2,346
Other Insurance Commissions		0		2,161	2,161
Administrative Fees		4,360		177,244	181,604
Commissions from Loan Brokering		17,609		252,608	270,217
Other Income		10,315		756,028	766,343
Income from Consumer Loans	\$	169,125	\$_	6,036,555	\$ 6,205,680
COMMERCIAL LOANS					
Charges Earned on Loans					\$ 9,328,880
Collection from Charged-Off Accounts					27,616
Income from Credit Insurance					1,552
Other Insurance Commissions					38
Commissions from Loan Brokering					127,733
Other Income					 1,160,981
Income from Commercial Loans					\$ 10,646,800
Total Income from All Loans					\$ 16,852,480
ALL OTHER BUSINESS AND SOURCES					
Charges Earned on Loans					\$ 129,246,445
Other Interest or Return on Investments					10,423,893
Collection from Charged-Off Accounts					3,324,637
Income from Credit Insurance					11,695
Other Insurance Commissions					1,285,472
Other Income Relating to Loans					 387,751,450
Total Income from All Other Business and S	Sourc	es			\$ 532,043,592

### Exhibit E California Finance Lenders Loans Made or Refinanced by Size Calendar Year 2019 (\$ in thousands)

Size of Loans	Number of Loans	% of Total Number	Principal Amount		% of Total Amount
CONSUMER LOANS					
\$ 499 or less	387,952	20.49	\$	70,861	0.12
500 to 1,999	337,218	17.81		286,610	0.50
2,000 to 2,499	36,864	1.95		81,064	0.14
2,500 to 4,999	597,717	31.57		1,858,948	3.26
5,000 to 9,999	258,733	13.66		1,731,553	3.04
10,000 or more	274,927	14.52		52,981,179	92.93
Total Consumer Loans Made	1,893,411	100.00	\$	57,010,216	100.00
COMMERCIAL LOANS					
\$5,000 or more	905,341	100.00	\$	186,379,887	100.00
Total Commercial Loans Made	905,341	100.00	\$	186,379,887	100.00
Total Loans Made, All Categories	2,798,752		\$	243,390,103	

#### **Breakdown of Number of Consumer Loans by Loan Size**

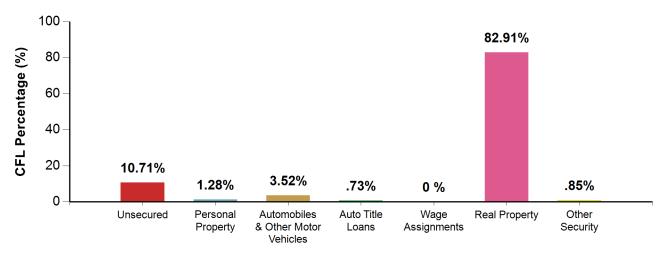


### Exhibit F California Finance Lenders Loans Made or Refinanced by Type of Security Calendar Year 2019 (\$ in thousands)

Type of Security	Number of Loans	% of Total Number	Principal Amount		% of Total Amount
CONSUMER LOANS					
LOANS UNDER \$2,500					
Unsecured Personal Property Automobiles & Other Motor Vehicles Auto Title Loans Wage Assignments Other Security	752,465 896 361 309 0 8,003	98.74 0.12 0.05 0.04 0.00 1.05	\$	425,558 1,410 417 324 0 10,826	97.04 0.32 0.10 0.07 0.00 2.47
Total Loans Made	762,034	100.00	_\$_	438,535	100.00
LOANS OF \$2,500 TO \$4,999					
Unsecured Personal Property Automobiles & Other Motor Vehicles Auto Title Loans Wage Assignments Other Security	491,574 4,038 7,963 85,062 0 9,080	82.24 0.68 1.33 14.23 0.00 1.52	\$	1,522,202 14,771 30,658 259,721 0 31,596	81.89 0.79 1.65 13.97 0.00 1.70
Total Loans Made	597,717	100.00	_\$_	1,858,948	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	208,530 3,443 28,515 17,756 0 341	80.60 1.33 11.02 6.86 0.00 0.13 0.06	\$	1,378,239 22,924 213,645 113,251 0 2,534 960	79.60 1.32 12.34 6.54 0.00 0.15 0.06
Total Loans Made	258,733	100.00	_\$_	1,731,553	100.00
LOANS OF \$10,000 AND MORE					
Unsecured Personal Property Automobiles & Other Motor Vehicles Auto Title Loans Wage Assignments Real Property Other Security	53,532 20,858 74,037 2,943 0 120,178 3,379	19.47 7.59 26.93 1.07 0.00 43.71 1.23	\$	2,777,550 691,666 1,763,694 42,254 0 47,263,994 442,021	5.24 1.31 3.33 0.08 0.00 89.21 0.83
Total Loans Made	274,927	100.00	_\$_	52,981,179	100.00
Total Consumer Loans Made	1,893,411		\$_	57,010,215	

Type of Security	Number of Loans	% of Total Number		Principal Amount	% of Total Amount
ALL CONSUMER LOANS					
Unsecured	1,506,101	79.54	\$	6,103,549	10.71
Personal Property	29,235	1.54		730,771	1.28
Automobiles & Other Motor Vehicles	110,876	5.86		2,008,414	3.52
Auto Title Loans	106,070	5.60		415,550	0.73
Wage Assignments	0	0.00		0	0.00
Real Property	120,519	6.37		47,266,528	82.91
Other Security	20,610	1.09		485,403	0.85
Total Consumer Loans Made	1,893,411	100.00	_\$_	57,010,215	100.00

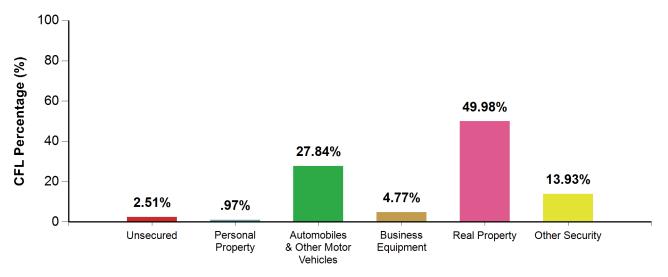
#### Breakdown of Dollar Amount of Consumer Loans Made or Refinanced by Type of Security



Type of Security

Type of Security	Number of Loans	% of Total Number	_	Principal Amount	% of Total Amount
COMMERCIAL LOANS					
Unsecured Personal Property Automobiles & Other Motor Vehicles Business Equipment Real Property	246,389 6,278 510,637 35,450 52,290	27.22 0.69 56.40 3.92 5.78	\$	4,670,269 1,813,036 51,884,612 8,898,629 93,144,802	2.51 0.97 27.84 4.77 49.98
Other Security  Total Commercial Loans Made	905,341	100.00	\$	25,968,539 186,379,887	13.93
Total Loans Made, All Categories	2,798,752		\$	243,390,102	

#### Breakdown of Dollar Amount of Commercial Loans Made or Refinanced by 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	145,032		\$	44,098	
Alternate Rate:					
1.6% per month Federal Reserve Bank Rate plus 10%	104 0			146 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	214,078 17,695 57,990 10,352 96,619 53,543 291,957 12,751 7,048 1	28.09 2.32 7.61 1.36 12.68 7.03 38.31 1.67 0.92 0.00	\$ \$	43,504 17,986 27,550 8,580 28,883 69,938 236,295 3,521 2,277 2	9.92 4.10 6.28 1.96 6.59 15.95 53.88 0.80 0.52 0.00
LOANS OF \$2,500 TO \$4,999  Up to 14.999 APR	4.044	0.69	œ	12.012	0.75
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	4,044 5,302 4,616 6,530 22,216 140,815 23,129 43,282 347,748	0.68 0.89 0.77 1.09 3.72 23.56 3.87 7.24 58.18	\$ 	13,913 19,178 15,050 24,023 77,161 487,251 78,562 142,004 1,001,691	0.75 1.03 0.81 1.29 4.15 26.21 4.23 7.64 53.88
Total Loans Made	597,717	100.00	_\$	1,858,948	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	6,590 2,617 8,032 30,030 60,249 92,665 11,176 18,376 28,897	2.55 1.01 3.10 11.61 23.29 35.81 4.32 7.10 11.17	\$	48,263 18,777 56,552 243,925 408,802 608,521 76,630 110,656 158,767	2.79 1.08 3.27 14.09 23.61 35.14 4.43 6.39 9.17
Variable Rate	101	0.04		660	0.04
Total Loans Made  LOANS OF \$10,000 AND MORE	258,733	100.00	\$	1,731,553	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	208,678 9,407 13,276 4,729 5,082 25,473 885 3,325 1,181 2,891	75.90 3.42 4.83 1.72 1.85 9.27 0.32 1.21 0.43	\$	50,473,514 246,913 222,572 72,958 70,075 326,423 10,971 38,089 318,154 1,201,510	95.27 0.47 0.42 0.14 0.13 0.62 0.02 0.07 0.60 2.27
Total Loans Made	274,927	100.00	_\$_	52,981,179	100.00
Total Consumer Loans Made	1,893,411		\$	57,010,216	

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	604,636 50,642 8,221 7,208 4,170 2,764 196,471 6,526 12,952	66.79 5.59 0.91 0.80 0.46 0.31 21.70 0.72 1.43	\$	137,336,682 1,920,778 497,592 346,324 165,073 133,509 419,127 271,509 11,071,046	73.69 1.03 0.27 0.19 0.09 0.07 0.22 0.15 5.94
Variable Rate	11,751	1.30		34,218,246	18.36
Total Commercial Loans Made	905,341	100.00	\$_	186,379,886	100.00
Total Loans Made, All Categories	2,798,752		_\$_	243,390,102	

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	144,690		\$	43,941	
Alternate Rate: 1.6% per month Federal Reserve Bank Rate plus 10%	104 0			146 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	209,922 13,315 57,157 10,322 96,479 53,525 291,956 12,740 7,048	27.90 1.77 7.60 1.37 12.82 7.11 38.80 1.69 0.94	\$	39,160 10,926 26,180 8,538 28,752 69,923 236,294 3,506 2,277	9.20 2.57 6.15 2.01 6.76 16.43 55.53 0.82 0.54
Variable Rate	1	0.00		2	0.00
Total Loans Made	752,465	100.00	\$	425,558	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	2,431 1,983 3,449 3,174 19,884 133,717 21,487 20,902 284,514	0.49 0.40 0.70 0.65 4.04 27.20 4.37 4.25 57.88	\$	8,107 6,731 10,726 11,373 68,287 459,969 73,298 67,238 816,364 110	0.53 0.44 0.70 0.75 4.49 30.22 4.82 4.42 53.63 0.01
Total Loans Made	491,574	100.00	_\$_	1,522,203	100.00

Rate Charged	Number of Loans	% of Total Number	_	Principal Amount	% of Total Amount
CONSUMER LOANS - UNSECURED					
LOANS OF \$5,000 TO \$9,999					
Up to 14.999 APR 15.000 to 19.999 APR 20.000 to 24.999 APR 25.000 to 29.999 APR 30.000 to 34.999 APR 35.000 to 39.999 APR 40.000 to 69.999 APR 70.000 to 99.999 APR	3,901 1,672 4,251 27,153 54,693 75,620 9,985 9,642 21,512	1.87 0.80 2.04 13.02 26.23 36.26 4.79 4.62 10.32	\$	27,309 11,202 27,139 222,480 368,510 485,024 68,532 55,379 112,005	1.98 0.81 1.97 16.14 26.74 35.19 4.97 4.02 8.13
Variable Rate	101	0.05		660	0.05
Total Loans Made  LOANS OF \$10,000 AND MORE	208,530	100.00	_\$_	1,378,240	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	31,880 2,756 1,104 671 790 12,662 351 1,891 79	59.55 5.15 2.06 1.25 1.48 23.65 0.66 3.53 0.15	\$	2,325,871 90,655 19,052 10,107 9,669 155,463 3,689 19,935 7,048	83.74 3.26 0.69 0.36 0.35 5.60 0.13 0.72 0.25 4.90
Total Loans Made	53,532	100.00	\$	2,777,549	100.00
Total Unsecured Consumer Loans Made	1,506,101		\$	6,103,550	

Rate Charged	Number of Loans	% of Total Number	_	Principal Amount	% of Total Amount
CONSUMER LOANS - PERSONAL PROPER LOANS UNDER \$2,500	RTY (HOUSEHOLD I	IEMS)			
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	
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	139 90 663 3 1 0 0	15.51 10.04 74.00 0.33 0.11 0.00 0.00 0.00	\$	209 140 1,056 4 2 0 0 0	14.81 9.92 74.84 0.28 0.14 0.00 0.00 0.00
Variable Rate  Total Loans Made	0 896	100.00	\$	1,411	100.00
LOANS OF \$2,500 TO \$4,999			<u> </u>	,	
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	146 77 556 86 490 2,683 0 0	3.62 1.91 13.77 2.13 12.13 66.44 0.00 0.00 0.00	\$	523 272 2,008 342 1,763 9,862 0 0	3.54 1.84 13.60 2.32 11.94 66.77 0.00 0.00 0.00
Total Loans Made	4,038	100.00	\$	14,770	100.00

Rate Charged	Number of Loans	% of Total Number	Principal Amount	% of Total Amount
CONSUMER LOANS - PERSONAL PROPER	TY (HOUSEHOLD I	TEMS)		
LOANS OF \$5,000 TO \$9,999				
Up to 14.999 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	67 6 242 82 479 2,567 0 0	1.95 0.17 7.03 2.38 13.91 74.56 0.00 0.00	\$ 495 42 1,610 599 3,262 16,915 0 0	2.16 0.18 7.02 2.61 14.23 73.79 0.00 0.00 0.00
Variable Rate	0	0.00	 0	0.00
Total Loans Made	3,443	100.00	\$ 22,923	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	20,773 34 10 2 7 32 0 0 0	99.59 0.16 0.05 0.01 0.03 0.15 0.00 0.00 0.00	\$  683,766 7,351 108 22 80 339 0 0	98.86 1.06 0.02 0.00 0.01 0.05 0.00 0.00 0.00
Total Loans Made	20,858	100.00	\$ 691,666	100.00
Total Personal Property Consumer Loans Made	29,235		\$ 730,770	

Rate Charged	Number of Loans	% of Total Number	_	Principal Amount	% of Total Amount
CONSUMER LOANS - AUTOMOBILES AND C	OTHER MOTOR VE	HICLES			
LOANS UNDER \$2,500					
Step Rate: 2.5, 2, 1.5, 1% per month	299		\$	90	
Alternate Rate:	0			0	
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	204 11 137	56.51 3.05 37.95	\$	118 22 262	28.37 5.29 62.98
25.000 to 29.999 APR 30.000 to 34.999 APR	1 4	0.28 1.11		2 6	0.48 1.44
35.000 to 39.999 APR 40.000 to 69.999 APR	3 1	0.83 0.28		5 1	1.20 0.24
70.000 to 99.999 APR 100.000 or More APR	0	0.00 0.00		0 0	0.00 0.00
Variable Rate	0	0.00		0	0.00
Total Loans Made	361	100.00	\$_	416	100.00
LOANS OF \$2,500 TO \$4,999					
Up to 14.999 APR 15.000 to 19.999 APR	197 98	2.47 1.23	\$	788 393	2.57 1.28
20.000 to 24.999 APR 25.000 to 29.999 APR	501 582	6.29 7.31		1,912 2,319	6.24 7.56
30.000 to 34.999 APR	1,791	22.49		6,930	22.60
35.000 to 39.999 APR 40.000 to 69.999 APR	4,287 0	53.84 0.00		16,980 0	55.39 0.00
70.000 to 99.999 APR	0	0.00		0	0.00
100.000 or More APR	507	6.37		1,336	4.36
Variable Rate	0	0.00		0	0.00
Total Loans Made	7,963	100.00	\$_	30,658	100.00

Rate Charged	Number of Loans	% of Total Number	_	Principal Amount	% of Total Amount
CONSUMER LOANS - AUTOMOBILES AND	OTHER MOTOR VE	HICLES			
LOANS OF \$5,000 TO \$9,999					
Up to 14.999 APR 15.000 to 19.999 APR 20.000 to 24.999 APR 25.000 to 29.999 APR 30.000 to 34.999 APR 35.000 to 39.999 APR 40.000 to 69.999 APR 70.000 to 99.999 APR 100.000 or More APR	2,215 908 3,492 2,754 4,802 14,342 2 0	7.77 3.18 12.25 9.66 16.84 50.30 0.01 0.00 0.00	\$	17,494 7,303 27,451 20,576 35,147 105,664 10 0	8.19 3.42 12.85 9.63 16.45 49.46 0.00 0.00
Variable Rate	0	0.00		0	0.00
Total Loans Made	28,515	100.00	\$	213,645	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	34,776 6,385 12,074 4,019 4,122 12,661 0 0	46.97 8.62 16.31 5.43 5.57 17.10 0.00 0.00 0.00	\$	1,148,620 124,404 201,954 62,189 57,825 168,702 0 0	65.13 7.05 11.45 3.53 3.28 9.57 0.00 0.00 0.00
Total Loans Made	74,037	100.00	_\$_	1,763,694	100.00
Total Automobiles & Other Motor Vehicles Consumer Loans Made	110,876		_\$_	2,008,413	

Rate Charged	Number of Loans	% of Total Number	_	Principal Amount	% of Total Amount
<b>CONSUMER LOANS - AUTO TITLE LOANS</b>					
LOANS UNDER \$2,500					
Step Rate: 2.5, 2, 1.5, 1% per month	4		\$	2	
Alternate Rate: 1.6% per month Federal Reserve Bank Rate plus 10%	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	101 3 19 25 135 15 0 11 0	32.69 0.97 6.15 8.09 43.69 4.85 0.00 3.56 0.00 0.00	\$	105 5 32 34 123 9 0 16 0	32.41 1.54 9.88 10.49 37.96 2.78 0.00 4.94 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	45 6 73 32 40 102 1,642 22,379 60,741	0.05 0.01 0.09 0.04 0.05 0.12 1.93 26.31 71.41	\$	136 24 252 109 143 333 5,264 74,763 178,692	0.05 0.01 0.10 0.04 0.06 0.13 2.03 28.79 68.80 0.00
Total Loans Made	85,062	100.00	\$_	259,721	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 14.999 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	25 28 46 37 255 70 1,187 8,734 7,374	0.14 0.16 0.26 0.21 1.44 0.39 6.69 49.19 41.53	\$	179 210 348 241 1,753 460 8,075 55,277 46,707	0.16 0.19 0.31 0.21 1.55 0.41 7.13 48.81 41.24
Variable Rate	0	0.00	-	0	0.00
Total Loans Made	17,756	100.00	\$_	113,250	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	158 196 76 30 141 39 528 1,434 341 0	5.37 6.66 2.58 1.02 4.79 1.33 17.94 48.73 11.59 0.00	\$	3,969 3,734 1,254 520 2,188 699 7,220 18,154 4,516 0	9.39 8.84 2.97 1.23 5.18 1.65 17.09 42.96 10.69 0.00
Total Auto Title Consumer Loans Made	106,070		\$	415,549	

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	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 0.00		0	0.00
40.000 to 69.999 APR 70.000 to 99.999 APR	0	0.00		0	0.00 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 \$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 0.00		0	0.00 0.00
40.000 to 69.999 APR 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
Variable Rate	0	0.00		0	0.00
vanable Itale	<u> </u>	0.00		<u> </u>	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	0.00 0.00 0.00 0.00 0.00 0.00 0.00 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
Variable Rate	0	0.00		0	0.00
Total Loans Made	0	0.00	\$	0	0.00
LOANS OF \$10,000 AND MORE					
Up to 14.999 APR 15.000 to 19.999 APR 20.000 to 24.999 APR 25.000 to 29.999 APR 30.000 to 34.999 APR 35.000 to 39.999 APR 40.000 to 69.999 APR 70.000 to 99.999 APR 100.000 or More APR  Variable Rate	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	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0
Total Loans Made	0	0.00	_\$_	0	0.00
Total Wage Assignment Consumer Loans Made	0		\$	0	

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 100.000 or More APR	340 0 0 0 1 1 0 0 0	99.71 0.00 0.00 0.00 0.29 0.00 0.00 0.00	\$	2,528 0 0 0 7 0 0 0	99.72 0.00 0.00 0.00 0.28 0.00 0.00 0.00
Variable Rate	0	0.00	_	0	0.00
Total Loans Made	341	100.00	\$	2,535	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	117,858 20 0 0 1 1 1 0 0 759 1,539	98.07 0.02 0.00 0.00 0.00 0.00 0.00 0.63 1.28	\$ 	45,951,041 10,267 0 0 12 180 0 0 305,368 997,127	97.22 0.02 0.00 0.00 0.00 0.00 0.00 0.65 2.11
Total Real Property Consumer Loans Made	120,519		_\$_	47,266,530	

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	39		\$	66	
Alternate Rate:					
1.6% per month Federal Reserve Bank Rate plus 10%	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	3,712 4,276 14 1 0 0 0 0 0 0	46.38 53.43 0.17 0.01 0.00 0.00 0.00 0.00 0.00	\$	3,911 6,894 20 1 0 0 0 0 0	36.13 63.68 0.18 0.01 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	1,225 3,138 37 2,656 11 26 0 1 1,986	13.49 34.56 0.41 29.25 0.12 0.29 0.00 0.01 21.87	\$	4,359 11,758 152 9,880 38 107 0 3 5,299	13.80 37.21 0.48 31.27 0.12 0.34 0.00 0.01 16.77
Total Loans Made	9,080	100.00	\$_	31,596	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 14.999 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	42 3 1 4 19 66 2 0 11	28.38 2.03 0.68 2.70 12.84 44.59 1.35 0.00 7.43	\$	257 19 5 29 123 458 13 0 55	26.80 1.98 0.52 3.02 12.83 47.76 1.36 0.00 5.74 0.00
Total Loans Made	148	100.00	\$	959	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	3,233 16 12 7 21 78 6 0 2 4	95.68 0.47 0.36 0.21 0.62 2.31 0.18 0.00 0.06 0.12	<b>\$</b>	360,247 10,502 205 120 302 1,040 61 0 1,223 68,323	81.50 2.38 0.05 0.03 0.07 0.24 0.01 0.00 0.28 15.46
Total Other Securities Consumer Loans Made	20,610		\$	485,404	

### Exhibit H California Finance Lenders Schedule of Loan Activity Calendar Year 2019 (\$ in thousands)

Table 3: Consumer Loans Serviced - Unsecured and Personal Property

	Unse	cured	Personal Property	
	Number of Loans	Principal Amount	Number of Loans	Principal Amount
Loans Outstanding at Prior Year End 12/31/2018	1,210,587	\$9,405,132	88,235	\$2,177,417
Loans Outstanding at Year End 12/31/2019	1,570,654	\$10,288,264	103,160	\$2,618,716
Loans with One or More Past Due Payments Which are Past Due 30 or More Days at 12/31/2019	133,104	\$340,434	1,937	\$34,433

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

	•				
	Unse	cured	Personal Property		
	Number of Loans	Principal Amount	Number of Loans	Principal Amount	
Number of Loans Charged One or More Late Fees	447,085		5,930		
Total Late Fees Collected	960,365	\$16,946	6,366	\$243	
Total Number of Repossessions Conducted	0		86		
Total Number of Loans Reinstated	9,166		22		
Total Number of Collateral Redeemed	0		6		
Total Collateral Sales Resulting in a Deficiency Balance	0	\$207	60	\$430	
Total Collateral Sales Resulting in a Surplus Balance	0	\$0	13	\$542	
Total Charge-offs	256,838	\$766,023	4,425	\$100,444	
Average Contracted Term of Loan (In Months)	65		154		

### Exhibit H (continued) California Finance Lenders Schedule of Loan Activity Calendar Year 2019 (\$ in thousands)

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

	Automob Other Moto		Auto Title	e Loans
	Number of Loans	Principal Amount	Number of Loans	Principal Amount
Loans Outstanding at Prior Year End 12/31/2018	2,156,886	\$28,829,194	120,643	\$390,760
Loans Outstanding at Year End 12/31/2019	1,612,725	\$25,898,655	116,959	\$389,887
Loans with One or More Past Due Payments Which are Past Due 30 or More Days at 12/31/2019	49,375	\$865,137	16,567	\$50,175

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

	Automobi		And a Title	
	Other Motor	venicies	Auto Title	Loans
	Number of	Principal	Number of	Principal
	Loans	Amount	Loans	Amount
Number of Loans Charged One				
or More Late Fees	440,722		61,828	
Total Late Fees Collected	403,837	\$30,746	134,229	\$2,245
Total Number of				
Repossessions Conducted	37,628		22,968	
Total Number of Loans				
Reinstated	8,531		8,094	
Total Number of Collateral				
Redeemed	8,994		2,213	
Total Collateral Sales Resulting				
in a Deficiency Balance	35,891	\$402,568	13,774	\$23,690
Total Collateral Sales Resulting				
in a Surplus Balance	20	\$25	239	\$1,352
Total Charge-offs	51,945	\$676,892	22,219	\$65,977
Average Contracted Term of				
Loan (In Months)	56		28	

### Exhibit H (continued) California Finance Lenders Schedule of Loan Activity Calendar Year 2019 (\$ in thousands)

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

	Real Property		Other Security	
	Number of Loans	Principal Amount	Number of Loans	Principal Amount
Loans Outstanding at Prior Year End 12/31/2018	113,383	\$38,719,804	36,397	\$4,148,979
Loans Outstanding at Year End 12/31/2019	223,025	\$69,453,536	44,935	\$7,227,669
Loans with One or More Past Due Payments Which are Past Due 30 or More Days at 12/31/2019	11,375	\$2,955,750	1,381	\$249,887

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

	Real P	roperty	Other Security	
	Number of Loans	Principal Amount	Number of Loans	Principal Amount
Number of Loans Charged One or More Late Fees	36,901		39,817	
Total Late Fees Collected	43,176	\$8,353	45,556	\$705
Total Number of Foreclosures/ Repossessions Conducted	6		207	
Total Number of Loans Reinstated	833		63	
Total Number of Collateral Redeemed	20		4	
Total Collateral Sales Resulting in a Deficiency Balance	67	\$5,448	188	\$3,686
Total Collateral Sales Resulting in a Surplus Balance	145	\$15,777	82	\$6,897
Total Charge-offs	9	\$19,621	619	\$4,573
Average Contracted Term of Loan (In Months)	238	. ,	135	. ,

### Exhibit I California Finance Lenders Default Rate by Security Type and Size of Loan As of December 31, 2019

Table 9: Consumer Loans Under \$2,500

	Unsecured	Personal Property	Automobiles & Other Motor Vehicles	Auto Title Loans
Total # of Charge-Offs	72,753	440	506	127
Total # of Loans Outstanding	492,656	2,407	1,665	246
Current Loans	420,090	2,258	1,260	161
1 Payment Past Due	19,847	54	220	17
2 Payments Past Due	13,028	34	59	13
3 or More Payments Past Due	39,691	61	126	55
	Wage	Other		
	Assignments	Security	Totals	
Total # of Charge-Offs	0	168	73,994	
Total # of Loans Outstanding	0	4,061	501,035	
Current Loans	0	3,753	427,522	
1 Payment Past Due	0	183	20,321	
2 Payments Past Due	0	61	13,195	
3 or More Payments Past Due	0	64	39,997	

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

	Unsecured	Personal Property	Automobiles & Other Motor Vehicles	Auto Title Loans
Total # of Charge-Offs	150,480	1,129	711	19,244
Total # of Loans Outstanding	436,040	7,883	7,704	471,217
Current Loans	353,582	7,321	6,541	166,032
1 Payment Past Due	30,920	119	636	13,463
2 Payments Past Due	15,866	95	172	4,249
3 or More Payments Past Due	35,672	348	355	287,473
	Wage Assignments	Other Security	Totals	
Total # of Charge-Offs	0	396	171,960	
Total # of Loans Outstanding	0	6,890	929,734	
Current Loans	0	6,247	539,723	
1 Payment Past Due	0	341	45,479	
2 Payments Past Due	0	124	20,506	
3 or More Payments Past Due	0	178	324,026	

### Exhibit I (continued) California Finance Lenders Default Rate by Security Type and Size of Loan As of December 31, 2019

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

	Unsecured	Personal Property	Automobiles & Other Motor Vehicles	Auto Title Loans
Total # of Charge-Offs	28,409	809	1,604	2,386
Total # of Loans Outstanding	277,177	8,310	28,336	19,039
Current Loans	247,255	7,780	25,777	14,601
1 Payment Past Due	14,245	120	1,460	2,992
2 Payments Past Due	5,140	73	410	723
3 or More Payments Past Due	10,537	337	689	723
	Wage Assignments	Real Property	Other Security	Totals
Total # of Charge-Offs	0	1	8	33,217
Total # of Loans Outstanding	0	506	187	333,555
Current Loans	0	497	157	296,067

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

0

0

0

3

2

	Unsecured	Personal Property	& Other Motor Vehicles	Auto Title Loans
Total # of Charge-Offs	5,196	2,047	49,124	462
Total # of Loans Outstanding	101,376	94,459	1,572,570	3,126
Current Loans	97,550	92,260	1,522,991	2,305
1 Payment Past Due	1,962	1,362	35,390	554
2 Payments Past Due	682	395	10,409	150
3 or More Payments Past Due	1,182	442	3,780	117
	Wage Assignments	Real Property	Other Security	Totals
Total # of Charge-Offs	0	8	47	56,884
Total # of Loans Outstanding	0	2,364,648	37,968	4,174,147
Current Loans	0	2,363,577	36,850	4,115,533
1 Payment Past Due	0	581	189	40,038
2 Payments Past Due	0	207	321	12,164
3 or More Payments Past Due	0	283	608	6,412

1 Payment Past Due

2 Payments Past Due

3 or More Payments Past Due

18,833

6,352

12,303

13

4

13

Automobiles

### Exhibit J California Finance Lenders Loans Made Online by Type of Security Calendar Year 2019 (\$ in thousands)

Table 13: Loans Made Online

Total Number of CFL Licensees Making Loans	1,514
Total Number of CFL Licensees Making Online Loans	121
% of CFL Licensees Making Online Loans	7.99%
Aggregate Principal Amount of All CFL Loans Made	\$ 243,390,103
Aggregate Principal Amount of Online CFL Loans Made	\$ 13,781,663
% of Online CFL Loans Made	5.66%

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			<u> </u>	
Unsecured (Under \$2,500)	330,502	49.74	\$104,045	0.89
Unsecured (\$2,500 and Above)	301,190	45.33	\$2,689,543	23.07
Personal Property	3,053	0.46	\$94,137	0.81
Automobiles & Other Motor Vehicles	4,990	0.75	\$86,471	0.74
Auto Title Loans	1,424	0.21	\$6,052	0.05
Wage Assignments	0	0.00	\$0	0.00
Real Property	23,108	3.48	\$8,672,235	74.38
Other Security	221	0.03	\$6,902	0.06
Total Consumer Loans Made	664,488	100.00	\$11,659,385	100.00
Type of Security  COMMERCIAL LOANS	Number of Loans	% of Total Number to All CFL Commercial Number	Principal Amount	% of Total Amount to All CFL Commercial Amount
Unsecured	13,754	47.04	\$277,461	13.07
Personal Property	4,499	15.39	\$399,728	18.83
Automobiles & Other Motor Vehicles	40	0.14	\$300	0.01
Business Equipment	728	2.49	\$145,875	6.87
Real Property	1,610	5.51	\$630,372	29.70
Other Security	8,608	29.44	\$668,542	31.50
Total Commercial Loans Made	29,239	100.00	\$2,122,278	100.00

#### Exhibit K Property Assessed Clean Energy (PACE) Program Key Findings Calendar Year 2019

On October 4, 2017, the Governor signed AB 1284 (Chapter 475, Statutes of 2017). The bill renamed the California Finance Lenders Law as the California Financing Law and set forth a licensing scheme for Property Assessed Clean Energy (PACE) program administrators. A "program administrator" is a person administering a PACE program on behalf of a public agency. (Fin. Code, § 22018.) 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. (Fin. Code, § 22016.)

#### Financial Code section 22692 states:

22692 (a) The commissioner shall require a program administrator to submit the following information in the annual report filed under Section 22159:

- (1) Information beneficial to an evaluation of the overall impact on property owners caused by the 97 percent cap on total PACE and mortgage-related debt.
- (2) Information beneficial to an evaluation of the overall impact on property owners caused by the use of an automated valuation model in determining the market value of property subject to a PACE assessment.
- (3) Information beneficial to an evaluation of the overall impact on property owners caused by the emergency HVAC provisions.
- (4) Information relevant to determining the overall impact on property owners of the absence of a minimum residual income threshold.

#### Key findings of this report include:

- PACE program administrators reported gross income of \$62,493,387 from PACE program assessment financing.
- The total amount of assessment contracts funded by PACE program administrators was \$362,347,433.
- The total number of PACE assessment contracts funded and originated in 2019 was 12,335.
- The total number of PACE assessment contract funded reported under Streets and Highways Code (S&H Code) section 5954 was 12,350. The data collected under S&H Code section 5954 includes PACE assessments originated prior to 2019. Detail information required under S&H Code section 5954 is available by city, by county, and by ZIP Code.
- In 2019, the aggregated total fees and other charges assessed to property owners, including interest, was \$83,337,986.

- PACE program administrators reported making a total of 23 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).
- The reported estimated amount of greenhouse gas emissions reductions in 2019 was 277,644 kilotons (KT).
- The number of jobs created during 2019 was estimated to be 3,254.
- 593 PACE assessment contracts were canceled by consumers within three days of executions in 2019.
- 1,935 PACE assessments were funded for HVAC systems, boilers, or other temperature regulation systems not in the case of emergency or immediate necessity.
- The program administrators provided the number of energy and water saving improvement products installed during 2019. 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.
- An evaluation of the overall impact on property owners caused by the 97 percent cap on total PACE and mortgage-related debt was not included in this report. The 2019 data submitted by PACE program licensees will serve as the baseline for delinquencies reported in future years.

### Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Licensing Data Calendar Year 2019

#### PROGRAM ADMINISTRATOR LICENSING DATA

The table below shows the number of licensed PACE program administrators as of December 31, 2019. 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

	2019	
Number of Licensed Program Administrators as of December 31	5	
Number of Program Administrators License Surrendered	0	
Number of Program Administrators License Revoked	0	
Number of Licensed Program Administrators as of December 31, 2019.	5	
Number of Enrolled PACE Solicitors at December 31	6,443	
Number of Enrolled PACE Solicitor Agents at December 31	51,095	

### Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Violations Found During Examinations Calendar Year 2019

#### **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 DBO conducted of PACE program licensees from January 1, 2019 through December 31, 2019. 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 2019, the DBO conducted two regulatory examinations of two of the five program licensees.

**Table 15: Number and Type of Violations** 

Violation Description	CFL Section	S&H	2019
Making consumer loans without being licensed as finance lender or broker	22100(a) and 22689(c)	5898.18	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 report PACE solicitor as enrolled	22680(a)		1
Engaged in the business with PACE solicitor not reported as enrolled	22680(d)		1
Failure to provide proof that PACE solicitor agents have completed and passed the test of the introductory training	22681(b)		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
Failure to verify whether the assessment contract was executed prior to work commencement	22686		2
Failure to determine that property owner has an ability to repay the annual PACE assessment payment	22686 and 22687		2
Failure to confirm the amount and sources of property owner's income during the oral confirmation of key terms call	22687(a)(6)		1
Failure to verify that price of PACE finance project is not different from paid in cash price	22689(c)	5926	1
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) and 5898.17(a)	2
Failure to confirm the assessment contract and financing estimate and disclosure to all property owners	22689(c)	5902(g) and 5913	2

### Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Complaint Information and Recommendations for Improving Program Calendar Year 2019

#### COMPLAINT INFORMATION

In 2019, a total of 157 complaints were received by the DBO 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
Total number of complaints received	157
Total number of complaints awaiting resolution	53
Total number of complaints resolved	104

**Table 17: Complaints by Complaint Reason** 

	2019
Administrative issue	1
Fraud allegation	4
Identity theft allegation	4
Investment fraud allegation	2
Mishandled transaction	14
Omission or misrepresentation of facts in application	4
Payment dispute	36
Unethical behavior or tactics	70
Other*	22

<sup>\*</sup>Other includes complaints that did not specify a program administrator, solicitor, or solicitor agent, and complaints that were not under the DBO's jurisdiction.

#### RECOMMENDATIONS FOR IMPROVING PROGRAM

The licensing and regulation of the PACE program by DBO commenced on January 1, 2019. Currently, there are only five PACE program administrators licensed with DBO. Given these factors, the DBO believes making recommendations for improvement is premature at this time.

#### LICENSING DATA

#### **APPENDIX**

The information provided in this section was obtained from statutorily required annual reports that PACE program administrators filed with the DBO. 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
Total number of PACE assessments	12,335
Aggregate amount of PACE assessment funded	\$362,347,433

**Table 19: Assessment Contract Term** 

	2019
Average term of assessment contract (in years)	19.85
Median term of assessment contract (in years)	20

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

	2019
At or below 4.00%	520
4.01% — 8.00%	6,781
8.01% - 12.00%	5,034
12.01% - 16.00%	0
16.01% — 20.00%	0
Above 20%	0
Total PACE assessments	12,335

Table 21: Number of Assessment Contracts by APR by Year

	2019
At or below 4.00%	330
4.01% — 8.00%	4,064
8.01% — 12.00%	7,899
12.01% - 16.00%	42
16.01% — 20.00%	0
Above 20%	0
Total PACE assessments	12,335

**Table 22: Residential Property Data** 

	2019
Aggregated average market value of property encumbered by mortgage-related PACE assessments	2,574,765
Aggregate median market value of property encumbered by mortgage-related and PACE assessments	448,180

**Table 23: Delinquent PACE Assessments** 

	2019
Total delinquent amount	\$ 9,971,264
Average number of missed payments	1.60

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

**Table 24: Defaulted PACE Assessments** 

	2019
Total defaulted amount	\$5,034,107
Average number of missed payments	3.50
Total number of parcels defaulted	760
Average number of years in default	1.56
Percentage of defaults represent of the total assessments within each ZIP Code	1.39%

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

**Table 25: Foreclosure Actions** 

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

\*Pending sale.

#### Table 26: Number of PACE Assessments and Mortgage-Related Debt at the time the Assessment Contract was Entered

	2019
Above 97 percent cap on total PACE and mortgage-related debt	0
95.00 – 97.00 percent cap on total PACE and mortgage-related debt	871
90.10 – 94.99 percent cap on total PACE and mortgage-related debt	1,165
87.10 – 90.00 percent cap on total PACE and mortgage-related debt	674
85.10 – 87.00 percent cap on total PACE and mortgage-related debt	403
82.00 – 85.00 percent cap on total PACE and mortgage-related debt	634
Below 82 percent cap on total PACE and mortgage-related debt	8,588
Total PACE assessments	12,335

#### **Table 27: Method of Determining the Market Value of the Property**

	2019
Automated valuation model	11,351
Appraisal	984
Property valuation not obtained	0
Total PACE assessments	12,335

#### Table 28: Residual Income of the Property Owners

	2019
Average residual income of the property owners upon entering into the assessment contract	\$12,066
Median residual income of the property owners upon entering into assessment contract	\$7,444

#### Table 29: PACE Assessments Funded Under Emergency Procedures in Financial Code section 22687(e)

	Number of	2019
Type of Improvement	Improvements	Average Cost
Central air conditioner emergency HVAC	13	\$12,028
Central air conditioner emergency, furnace emergency HVAC	5	\$12,073
Cool roof	1	\$4,000
Duct replacement emergency HVAC	1	\$14,281
Electric tankless water heater	1	\$7,995
Energy efficient	1	\$15,830
Furnace emergency HVAC	9	\$10,839
Heating and air conditioning package unit emergency HVAC	1	\$13,564
High-efficiency HVAC	2	\$14,273
Water conservation	27	\$13,672
Water delivery systems	2	\$7,930
Total Improvements	61*	

<sup>\*</sup>A total of 55 PACE assessments was funded and recorded under the emergency procedures in Financial Code section 22687, subdivision (e). PACE assessment may include multiple improvements.



California Department of Business Oversight

Toll-Free 1-866-275-2677
TTY 1-800-735-2922
Online www.dbo.ca.gov