

2021

California Department of Financial Protection and Innovation

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

Report Required by Financial Code Sections 22160 and 22692







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Business, Consumer Services and Housing Agency

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Financial Services

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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 has compiled 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 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.

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

Key Findings

- Finance lenders originated over 27 million consumer loans in 2021, a 132.7 percent increase over 2020. The total principal amount of loans made in 2021 increased by 29.7 percent in comparison to 2020 (to \$145.4 billion from \$112.2 billion).
 - Lenders originated 316,579 consumer loans secured by real estate for a total principal amount of \$132.9 billion.
 - The number of "buy now, pay later" unsecured consumer loans (26.5 million loans) made up 96.6 percent of the total consumer loans originated in 2021. The total principal amount of those loans was \$3.4 billion.
 - Excluding consumer loans secured by real estate and "buy now, pay later" loans from the total number of consumer loans, the number of consumer loans originated by finance lenders in 2021 was 906,971 with a total principal amount of \$9.1 billion.
- The number of online consumer loans originated in 2021 increased by 139.9 percent to 26.4 million from 11.2 million in 2020. The total principal amount of online loans increased by 118.9 percent over the same period, to \$31.7 billion from \$14.5 billion.

Other Findings

- The number of commercial loans originated in 2021 increased by 8 percent to 762,253 from 706,228 in 2020. The total principal amount of commercial loans increased by 33.5 percent over the same period, to \$214.2 billion from \$160.4 billion.
- The number of online commercial loans originated in 2021 increased by 3 percent to 37,110 from 36,016 in 2020. The total principal amount of online loans increased by 39.1 percent over the same period, to \$3.4 billion from \$2.4 billion.
- This report contains the third year of reporting on PACE financing and PACE program administrators. The 2021 PACE annual report incorporates the newly adopted regulations (Title 10 CCR § 1620.01-1620.29) that came into effect on October 1, 2021. The findings on PACE financing activity can be found on Exhibit K of this report.

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 with the Department of Financial Protection and Innovation (DFPI) Commissioner annual reports that provide information related to their lending activities under the program.

The DFPI is required to post a report every year on its website a composite of the annual reports and any comments on the report 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, 2021. The report does not capture all consumer loans in the state, for instance the report does not include small-dollar loans made through bank partnerships.

As of December 31, 2021, the DFPI licensed 4,340 lenders, brokers, lenders and brokers, and PACE program administrators. Of the 4,340 licensees, 4,098 filed their required annual reports. All four PACE program administrators filed their annual reports. The DFPI notified the non-filers of its intent to revoke their licenses.

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

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

This report and prior years' reports can be found on the DFPI's website at https://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
2021	4,340	7,592	1,644
2020	3,886	7,194	1,491
2019	3,616	7,392	1,406
2018	3,493	7,262	1,503
2017	3,200	6,776	1,398
2016	2,963	6,521	1,517
2015	2,580	6,369	1,358
2014	2,185	5,018	1,254
2013	2,155	4,776	1,191
2012	2,056	4,385	889

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

Table 2: Loan Details

			Average	Size of Loans Ma	ade
Year	Number of Loans Made	Principal Amount of Loans Made	Consumer Loans	Commercial Loans	All Loans
2021	28,525,892	\$ 359,593,617,554	\$ 5,238	\$ 280,953	\$ 12,606
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
2012	1,876,767	\$ 165,639,476,215	\$ 60,110	\$ 108,137	\$ 88,258

^{*}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, 2021 (\$ in thousands)

<u>ASSETS</u>		% of Total Assets
Cash	\$ 123,429,896	3.94
Investments	351,277,584	11.21
California Finance Lenders Loan Receivables	186,605,667	5.96
Other Receivables	1,315,325,950	41.98
Reserves and Withholds by Banks and Finance Companies	6,950,104	0.22
Real and Personal Property (Net)	144,162,575	4.60
Prepaid Expenses and Deferred Charges	7,456,673	0.24
Commissions Receivables	19,813,222	0.63
Other Assets	978,302,015	31.22
Total Assets	\$ 3,133,323,686	100.00
LIABILITIES AND NET WORTH		% of Total Liabilities and Net Worth
Loans and Notes Payable from Third Parties	\$ 620,379,036	19.80
Loans and Notes Payable from Parent Companies, Affiliates, etc.	396,989,135	12.67
Bonds, Debentures, and Certificates of Indebtedness	437,750,262	13.97
Accounts Payable	209,752,368	6.69
Dealers' Reserves and Withholds	1,172,406	0.04
Accrued Taxes Other Than Income Tax	2,320,629	0.07
Reserve for Income Taxes	27,057,966	0.86
Credit Insurance Premiums Due Insurer	259,806	0.01
Other Liabilities and Accruals	834,001,858	26.62
Total Liabilities	2,529,683,466	80.73
Net Worth	603,640,221	19.27
Total Liabilities and Net Worth	\$ 3,133,323,686	100.00

Exhibit B California Finance Lenders Analysis of Loans and Receivables Outstanding As of December 31, 2021 (\$ in thousands)

CALIFORNIA FINANCE LENDERS LOAN RECEIVABLES	Aggregate Balance	% of Subtotal
Consumer Loans	\$ 50,346,050	26.38
Commercial Loans	140,527,486	73.62
Subtotal	\$ 190,873,536	100.00
Less: Unearned Pre-computed Charges	934,755	
Allowance for Bad Debts	3,333,114	
Net California Finance Lenders Loan Receivables	\$ 186,605,667	
OTHER RECEIVABLES		
Sales Contracts	\$ 367,987,008	27.27
Leases (True Leases)	148,611,914	11.01
Factoring	19,199,754	1.42
Other	813,636,654	60.29
Subtotal	\$ 1,349,435,330	100.00
Less: Unearned Pre-computed Charges	12,873,172	
Allowance for Bad Debts	21,236,209	
Net California Finance Lenders Loan Receivables	\$ 1,315,325,949	

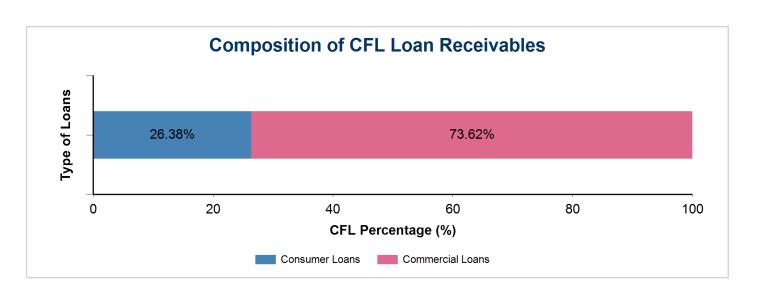


Exhibit C California Financing Law Licensees Statement of Income and Expenses Calendar Year 2021 (\$ in thousands)

<u>INCOME</u>			% of Total Income
Gross Income of California Financing Law Licensees from Loans Made and Brokered Loans	\$	19,467,003	4.65
Gross Income from All Other Businesses and Sources		399,573,221	95.35
Total Gross Income	\$	419,040,224	100.00
<u>EXPENSES</u>			
Loss on Loans Receivable	\$	2,926,292	0.70
Professional Audit and Accounting Services		1,076,462	0.26
Insurance and Bond Premiums		700,567	0.17
Legal Services and Expenses		1,507,330	0.36
Occupancy Expenses		2,822,391	0.67
Provision for Bad Debt Allowance		802,990	0.19
Salaries and Bonuses: Employees		46,791,173	11.17
Salaries and Bonuses: Owners, Partners, Executives		3,424,362	0.82
Depreciation		24,850,590	5.93
License Fees and Taxes		1,183,128	0.28
Telephone and Utilities		1,185,214	0.28
Advertising and Promotions		9,113,366	2.17
Other Expenses		194,780,312	46.48
Total Expenses Before Interest and Income Taxes	\$	291,164,177	69.48
Income or Loss Before Interest and Income Taxes	\$	127,876,048	30.52
Less: Interest Paid to Bona Fide Third Parties		22,290,421	5.32
Interest Paid to Parent Company, Affiliates and Others	3	6,485,745	1.55
Income or Loss Before Income Taxes	\$	99,099,882	23.65
Less: Provision for Income Taxes		7,954,250	1.90
Net Income or (Loss)	\$	91,145,632	21.75

Exhibit D California Financing Law Licensees Analysis of Income Received Calendar Year 2021 (\$ 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	\$	168,131	\$	4,686,956	\$ 4,855,087
Collection from Charged-Off Accounts		3,293		52,717	56,010
Income from Credit Insurance		18		3,901	3,919
Other Insurance Commissions		0		5,409	5,409
Administrative Fees		6,128		373,353	379,481
Commissions from Loan Brokering		87,522		639,127	726,649
Other Income		65,569		1,423,949	1,489,518
Income from Consumer Loans	\$	330,661	\$_	7,185,412	\$ 7,516,073
COMMERCIAL LOANS					
Charges Earned on Loans					\$ 10,566,422
Collection from Charged-Off Accounts					40,492
Income from Credit Insurance					291
Other Insurance Commissions					1,528
Commissions from Loan Brokering					174,548
Other Income					1,167,650
Income from Commercial Loans					\$ 11,950,931
Total Income from All Loans					\$ 19,467,004
ALL OTHER BUSINESS AND SOURCES					
Charges Earned on Loans					\$ 154,568,381
Other Interest or Return on Investments					11,654,485
Collection from Charged-Off Accounts					3,760,547
Income from Credit Insurance					15,446
Other Insurance Commissions					734,609
Other Income Relating to Loans					 228,839,753
Total Income from All Other Business and S	Source	es			\$ 399,573,221

Exhibit E California Finance Lenders Loans Made or Refinanced by Size Calendar Year 2021 (\$ in thousands)

Size of Loans	Number of Loans	% of Total Number	Principal Amount		% of Total Amount
CONSUMER LOANS					
\$ 499 or less	26,178,294	94.29	\$	3,011,508	2.07
500 to 1,999	709,041	2.55		556,514	0.38
2,000 to 2,499	23,081	0.08		50,689	0.03
2,500 to 4,999	180,025	0.65		603,735	0.42
5,000 to 9,999	186,579	0.67		1,340,199	0.92
10,000 or more	486,619	1.75	-	139,873,629	96.18
Total Consumer Loans Made	27,763,639	100.00	\$	145,436,274	100.00
COMMERCIAL LOANS					
\$5,000 or more	762,253	100.00		214,157,344	100.00
Total Commercial Loans Made	762,253	100.00	\$	214,157,344	100.00
Total Loans Made, All Categories	28,525,892		\$	359,593,618	

Breakdown of Number of Consumer Loans by Loan Size

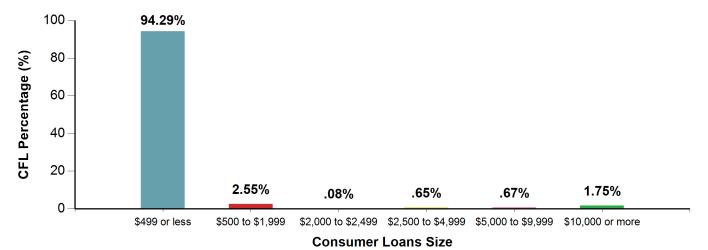
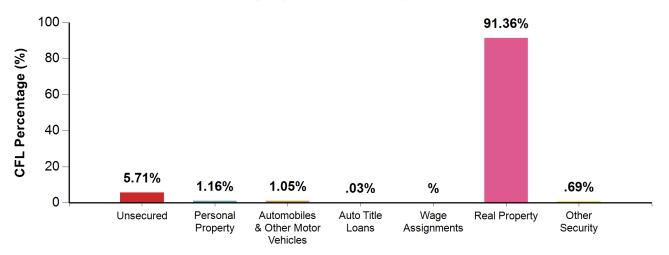


Exhibit F California Finance Lenders Loans Made or Refinanced by Type of Security Calendar Year 2021 (\$ in thousands)

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	26,884,332 975 69 10 365 24,665	99.90 0.00 0.00 0.00 0.00 0.00	\$	3,596,169 1,502 114 21 146 20,759	99.38 0.04 0.00 0.00 0.00 0.57
Total Loans Made	26,910,416	100.00	_\$_	3,618,711	100.00
LOANS OF \$2,500 TO \$4,999					
Unsecured Personal Property Automobiles & Other Motor Vehicles Auto Title Loans Wage Assignments Other Security	166,380 1,858 6,020 4,888 0 879	92.42 1.03 3.34 2.72 0.00 0.49	\$	555,512 6,843 22,464 15,847 0 3,068	92.01 1.13 3.72 2.62 0.00 0.51
Total Loans Made	180,025	100.00	_\$_	603,734	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	161,409 2,737 17,921 3,092 0 336 1,084	86.51 1.47 9.61 1.66 0.00 0.18 0.58	\$	1,157,883 19,493 132,419 20,905 0 2,613 6,886	86.40 1.45 9.88 1.56 0.00 0.19 0.51
Total Loans Made	186,579	100.00	\$	1,340,199	100.00
LOANS OF \$10,000 AND MORE					
Unsecured Personal Property Automobiles & Other Motor Vehicles Auto Title Loans Wage Assignments Real Property Other Security	75,936 33,277 53,217 556 0 316,243 7,390	15.60 6.84 10.94 0.11 0.00 64.99 1.52	\$	3,000,594 1,662,375 1,364,858 8,700 0 132,863,170 973,931	2.15 1.19 0.98 0.01 0.00 94.99 0.70
Total Loans Made	486,619	100.00	\$	139,873,628	100.00
Total Consumer Loans Made	27,763,639		\$_	145,436,272	

Type of Security	Number of Loans	·		Principal Amount	% of Total Amount
ALL CONSUMER LOANS					
Unsecured	27,288,057	98.29	\$	8,310,158	5.71
Personal Property	38,847	0.14		1,690,213	1.16
Automobiles & Other Motor Vehicles	77,227	0.28		1,519,855	1.05
Auto Title Loans	8,546	0.03		45,473	0.03
Wage Assignments	365	0.00		146	0.00
Real Property	316,579	1.14		132,865,783	91.36
Other Security	34,018	0.12		1,004,644	0.69
				_	
Total Consumer Loans Made	27,763,639	100.00	_\$_	145,436,272	100.00

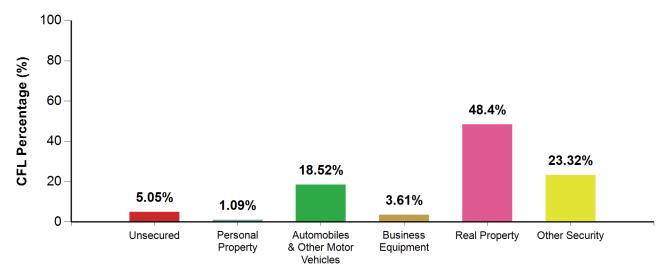
Breakdown of Dollar Amount of Consumer Loans Made or Refinanced by Type of Security



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 Other Security	119,715 11,571 468,470 31,322 54,344 76,831	15.71 1.52 61.46 4.11 7.13 10.08	\$	10,817,895 2,335,365 39,664,726 7,727,512 103,661,778 49,950,068	5.05 1.09 18.52 3.61 48.40 23.32
Total Commercial Loans Made	762,253	100.00	_\$_	214,157,344	100.00
Total Loans Made, All Categories	28,525,892		_\$	359,593,616	

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	117,794		\$	33,946	
Alternate Rate: 1.6% per month Federal Reserve Bank Rate plus 10%	70 0			105 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	26,212,165 182,298 309,523 49,431 65,577 90,541 793 1	97.41 0.68 1.15 0.18 0.24 0.34 0.00 0.00	\$	3,308,124 67,985 102,394 21,976 13,401 103,513 1,274	91.42 1.88 2.83 0.61 0.37 2.86 0.04 0.00 0.00
Variable Rate	87	0.00		41	0.00
Total Loans Made	26,910,416	100.00	_\$_	3,618,709	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	10,627 3,416 3,369 5,947 19,945 135,861 823 6 0	5.90 1.90 1.87 3.30 11.08 75.47 0.46 0.00 0.00	\$	35,253 11,296 11,953 19,754 62,864 460,085 2,394 21 0	5.84 1.87 1.98 3.27 10.41 76.21 0.40 0.00 0.00
Total Loans Made	180,025	100.00	\$	603,734	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	8,523 2,694 5,561 5,480 45,639 118,621 2 33 0	4.57 1.44 2.98 2.94 24.46 63.58 0.00 0.02 0.00	\$	59,019 18,951 39,795 39,922 385,002 797,105 13 200 0	4.40 1.41 2.97 2.98 28.73 59.48 0.00 0.01 0.00
Variable Rate	26	0.01		192	0.01
Total Loans Made	186,579	100.00	\$_	1,340,199	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	411,897 12,819 10,109 13,554 11,882 20,024 679 313 77 5,265	84.64 2.63 2.08 2.79 2.44 4.11 0.14 0.06 0.02 1.08	\$	137,280,967 279,715 171,388 178,792 166,547 251,345 9,356 21,217 10,407 1,503,895	98.15 0.20 0.12 0.13 0.12 0.18 0.01 0.02 0.01 1.08
Total Consumer Loans Made	27,763,639		\$	145,436,271	

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 Variable Rate	666,775 33,889 4,141 2,666 2,039 2,580 7,701 3,759 8,814 29,889	87.47 4.45 0.54 0.35 0.27 0.34 1.01 0.49 1.16 3.92	\$	154,351,216 1,815,933 604,167 538,553 223,428 229,638 461,434 194,925 1,813,799 53,924,251	72.07 0.85 0.28 0.25 0.10 0.11 0.22 0.09 0.85
Total Commercial Loans Made	762,253	100.00	\$	214,157,344	100.00
Total Loans Made, All Categories	28,525,892		\$	359,593,615	

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	117,794		\$	33,946	
Alternate Rate:	00			400	
1.6% per month Federal Reserve Bank Rate plus 10%	69 0			103 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	26,209,027 182,228 286,742 49,423 65,577 90,541 793 1	97.49 0.68 1.07 0.18 0.24 0.34 0.00 0.00	\$	3,304,904 67,894 83,217 21,965 13,401 103,513 1,274 1	91.90 1.89 2.31 0.61 0.37 2.88 0.04 0.00 0.00
Variable Rate	0	0.00		0	0.00
Total Loans Made	26,884,332	100.00	_\$_	3,596,169	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	9,594 3,351 2,434 5,325 17,681 127,177 818 0 0	5.77 2.01 1.46 3.20 10.63 76.44 0.49 0.00 0.00	\$	31,611 11,043 8,561 17,316 54,280 430,319 2,381 0 0	5.69 1.99 1.54 3.12 9.77 77.46 0.43 0.00 0.00
Total Loans Made	166,380	100.00	\$	555,511	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	6,099 2,204 3,215 2,131 38,948 108,787 1	3.78 1.37 1.99 1.32 24.13 67.40 0.00 0.00	\$	41,952 15,246 22,422 14,940 335,098 728,044 5	3.62 1.32 1.94 1.29 28.94 62.88 0.00 0.00
100.000 or More APR	0	0.00		0	0.00
Variable Rate	24	0.01		177	0.02
Total Loans Made LOANS OF \$10,000 AND MORE	161,409	100.00	\$	1,157,884	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	42,912 3,641 2,846 7,716 2,385 15,326 478 176 52	56.51 4.79 3.75 10.16 3.14 20.18 0.63 0.23 0.07	\$	2,462,178 76,302 44,531 87,192 29,240 187,859 6,041 1,816 520	82.06 2.54 1.48 2.91 0.97 6.26 0.20 0.06 0.02
Variable Rate	404	0.53		104,914	3.50
Total Loans Made	75,936	100.00	_\$_	3,000,593	100.00
Total Unsecured Consumer Loans Made	27,288,057		_\$_	8,310,157	

Rate Charged	Number of Loans	% of Total Number	_	Principal Amount	% of Total Amount
CONSUMER LOANS - PERSONAL PROPER	TY (HOUSEHOLD I	TEMS)			
LOANS UNDER \$2,500					
Step Rate: 2.5, 2, 1.5, 1% per month	0		\$	0	
Alternate Rate: 1.6% per month Federal Reserve Bank Rate plus 10%	1			2	
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	193 55 690 2 0 0 0 0 0	19.79 5.64 70.77 0.21 0.00 0.00 0.00 0.00 0.00 3.59	\$	302 70 1,122 2 0 0 0 0	20.12 4.66 74.75 0.13 0.00 0.00 0.00 0.00 0.00 0.00
Total Loans Made	975	100.00	_\$_	1,501	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	226 26 725 14 129 736 0 0	12.16 1.40 39.02 0.75 6.94 39.61 0.00 0.00 0.00	\$	847 102 2,606 59 468 2,756 0 0	12.38 1.49 38.08 0.86 6.84 40.27 0.00 0.00 0.00
Total Loans Made	1,858	100.00	\$_	6,843	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	889 0 372 13 235 1,228 0 0	32.48 0.00 13.59 0.47 8.59 44.87 0.00 0.00	\$	6,724 0 2,547 87 1,633 8,503 0 0	34.49 0.00 13.07 0.45 8.38 43.62 0.00 0.00
Variable Rate	0	0.00		0	0.00
Total Loans Made	2,737	100.00	\$	19,494	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	31,640 9 110 5 5 35 0 0 0	95.08 0.03 0.33 0.02 0.02 0.11 0.00 0.00 0.00	\$	1,584,596 1,434 2,001 65 54 385 0 0 0	95.32 0.09 0.12 0.00 0.00 0.02 0.00 0.00 0.00 4.44
Total Loans Made	33,277	100.00	_\$_	1,662,375	100.00
Total Personal Property Consumer Loans Made	38,847		\$	1,690,213	

Rate Charged	Number of Loans	% of Total Number	_	Principal 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 Federal Reserve Bank Rate plus 10%	0 0			0 0					
Other Rates: Up to 14.999 APR 15.000 to 19.999 APR 20.000 to 24.999 APR 25.000 to 29.999 APR 30.000 to 34.999 APR 35.000 to 39.999 APR 40.000 to 69.999 APR 70.000 to 99.999 APR 100.000 or More APR Variable Rate	0 4 59 6 0 0 0	0.00 5.80 85.51 8.70 0.00 0.00 0.00 0.00	\$	0 4 101 9 0 0 0 0	0.00 3.51 88.60 7.89 0.00 0.00 0.00 0.00				
Total Loans Made	69	100.00	\$_	114	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	15 19 179 573 2,102 3,130 2 0 0	0.25 0.32 2.97 9.52 34.92 51.99 0.03 0.00 0.00	\$	60 73 676 2,244 8,009 11,395 6 0	0.27 0.32 3.01 9.99 35.65 50.73 0.03 0.00 0.00				
Total Loans Made	6,020	100.00	\$	22,463	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	194 461 1,938 3,299 6,426 5,603 0	1.08 2.57 10.81 18.41 35.86 31.26 0.00 0.00	\$	1,409 3,502 14,587 24,627 48,055 40,238 0 0	1.06 2.64 11.02 18.60 36.29 30.39 0.00 0.00
Variable Rate Total Loans Made	17,921	<u>0.00</u> <u>100.00</u>	\$	132,418	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	17,283 9,116 7,125 5,775 9,370 4,547 0 1 0	32.48 17.13 13.39 10.85 17.61 8.54 0.00 0.00 0.00	\$	763,417 191,869 123,952 90,086 133,949 61,574 0 11 0	55.93 14.06 9.08 6.60 9.81 4.51 0.00 0.00 0.00
Total Automobiles & Other Motor Vehicles Consumer Loans Made	77,227		\$	1,519,853	

Rate Charged	Number of Loans	% of Total Number	_	Principal Amount	% of Total Amount
CONSUMER LOANS - AUTO TITLE LOANS					
LOANS UNDER \$2,500					
Step Rate: 2.5, 2, 1.5, 1% per month	0		\$	0	
Alternate Rate: 1.6% per month Federal Reserve Bank Rate plus 10%	0			0 0	
Other Rates: Up to 14.999 APR 15.000 to 19.999 APR 20.000 to 24.999 APR 25.000 to 29.999 APR 30.000 to 34.999 APR 35.000 to 39.999 APR 40.000 to 69.999 APR 70.000 to 99.999 APR 100.000 or More APR Variable Rate	0 0 10 0 0 0 0 0 0	0.00 0.00 100.00 0.00 0.00 0.00 0.00 0.	\$	0 0 21 0 0 0 0 0 0	0.00 0.00 100.00 0.00 0.00 0.00 0.00 0.
Total Loans Made	10	100.00	\$_	21	100.00
LOANS OF \$2,500 TO \$4,999 Up to 14.999 APR 15.000 to 19.999 APR 20.000 to 24.999 APR 25.000 to 29.999 APR 30.000 to 34.999 APR 35.000 to 39.999 APR 40.000 to 69.999 APR 70.000 to 99.999 APR 100.000 or More APR Variable Rate	1 6 24 8 26 4,814 3 6 0	0.02 0.12 0.49 0.16 0.53 98.49 0.06 0.12 0.00	\$	4 26 83 30 78 15,598 8 21 0	0.03 0.16 0.52 0.19 0.49 98.42 0.05 0.13 0.00
Total Loans Made	4,888	100.00	_\$_	15,848	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	7 10 27 11 12 2,991 1 33 0	0.23 0.32 0.87 0.36 0.39 96.73 0.03 1.07 0.00	\$	51 76 174 73 85 20,238 8 200 0	0.24 0.36 0.83 0.35 0.41 96.81 0.04 0.96 0.00
Variable Rate	0	0.00		0	0.00
Total Loans Made	3,092	100.00	_\$_	20,905	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	10 6 12 27 87 94 200 115 5 0	1.80 1.08 2.16 4.86 15.65 16.91 35.97 20.68 0.90 0.00	\$	357 84 168 571 1,341 1,255 3,091 1,710 124 0	4.10 0.97 1.93 6.56 15.41 14.42 35.52 19.65 1.43 0.00
Total Auto Title Consumer Loans Made	8,546		_\$_	45,475	

Rate Charged	Number of Loans	% of Total Number	_	Principal Amount	% of Total Amount
CONSUMER LOANS - WAGE ASSIGNMENT					
LOANS UNDER \$2,500					
Step Rate: 2.5, 2, 1.5, 1% per month	0		\$	0	
Alternate Rate: 1.6% per month Federal Reserve Bank Rate plus 10%	0			0	
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	365 0 0 0 0 0 0 0	100.00 0.00 0.00 0.00 0.00 0.00 0.00 0.	\$	146 0 0 0 0 0 0 0	100.00 0.00 0.00 0.00 0.00 0.00 0.00 0.
Total Loans Made	365	100.00	\$_	146	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	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
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 LOANS OF \$10,000 AND MORE	0	0.00	_\$_	0	0.00
Up to 14.999 APR 15.000 to 19.999 APR 20.000 to 24.999 APR 25.000 to 29.999 APR 30.000 to 34.999 APR 35.000 to 39.999 APR 40.000 to 69.999 APR 70.000 to 99.999 APR 100.000 or More APR Variable Rate Total Loans Made	0 0 0 0 0 0 0 0	0.00 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 Wage Assignment Consumer Loans Made	365		\$	146	

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	334 0 0 0 0 0 0 0	99.40 0.00 0.00 0.00 0.00 0.00 0.00 0.00	\$	2,598 0 0 0 0 0 0 0	99.43 0.00 0.00 0.00 0.00 0.00 0.00 0.00
Variable Rate Total Loans Made	336	100.00	- \$	2,613	100.00
LOANS OF \$10,000 AND MORE		100.00	_Ψ_	2,010	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	312,818 3 0 0 0 0 0 21 20 3,381	98.92 0.00 0.00 0.00 0.00 0.00 0.00 0.01 0.01	\$	131,525,656 807 0 0 0 0 0 17,681 9,763 1,309,263	98.99 0.00 0.00 0.00 0.00 0.00 0.00 0.01 0.01
Total Loans Made	316,243	100.00	_\$_	132,863,170	100.00
Total Real Property Consumer Loans Made	316,579		_\$_	132,865,783	

Rate Charged	Number of Loans	% of Total Number	_	Principal Amount	% of Total Amount
CONSUMER LOANS - OTHER SECURITIES					
LOANS UNDER \$2,500					
Step Rate:			_		
2.5, 2, 1.5, 1% per month	0		\$	0	
Alternate Rate:					
1.6% per month	0			0	
Federal Reserve Bank Rate plus 10%	0			0	
Other Rates:					
Up to 14.999 APR	2,580	10.46	\$	2,772	13.35
15.000 to 19.999 APR	11	0.04		17	0.08
20.000 to 24.999 APR 25.000 to 29.999 APR	22,022	89.28 0.00		17,934	86.39 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	Ö	0.00		Ö	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	52	0.21		36	0.17
Total Loans Made	24,665	100.00	\$_	20,759	100.00
LOANS OF \$2,500 TO \$4,999					
Up to 14.999 APR	791	89.99	\$	2,731	88.99
15.000 to 19.999 APR	14	1.59		52	1.69
20.000 to 24.999 APR	7	0.80		27	0.88
25.000 to 29.999 APR	27	3.07		105	3.42
30.000 to 34.999 APR	7	0.80		29	0.94
35.000 to 39.999 APR	4	0.46		16	0.52
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	0.00		0	0.00
Variable Rate	29	3.30		109	3.55
Total Lagra Mada	070	400.00	Φ.	0.000	400.00
Total Loans Made	<u>879</u>	100.00	\$_	3,069	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	1,000 19 9 26 18 12 0 0	92.25 1.75 0.83 2.40 1.66 1.11 0.00 0.00	\$	6,285 127 64 196 131 83 0 0	91.27 1.84 0.93 2.85 1.90 1.21 0.00 0.00
Variable Rate	0	0.00		0	0.00
Total Loans Made	1,084	100.00	\$	6,886	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	7,234 44 16 31 35 22 1 0 0 7	97.89 0.60 0.22 0.42 0.47 0.30 0.01 0.00 0.00 0.09	\$	944,764 9,220 735 878 1,962 271 224 0 0 15,877	97.01 0.95 0.08 0.09 0.20 0.03 0.02 0.00 0.00 1.63
Total Other Securities Consumer Loans Made	34,018		_\$	1,004,645	

Exhibit H California Finance Lenders Schedule of Loan Activity Calendar Year 2021 (\$ in thousands)

Table 3: Consumer Loans Serviced - Unsecured and Personal Property

	Unsecured		Personal P	roperty
	Number of Loans	Principal Amount	Number of Loans	Principal Amount
Loans Outstanding at Prior Year End 12/31/2020	3,548,262	\$8,826,289	121,356	\$2,887,015
Loans Outstanding at Year End 12/31/2021	5,775,580	\$10,770,319	64,919	\$1,945,368
Loans with One or More Past Due Payments Which are Past Due 30 or More Days at 12/31/2021	617,349	\$345,279	1,093	\$25,654

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

	Unsecured		Personal Pr	operty
	Number of Loans	Principal Amount	Number of Loans	Principal Amount
Number of Loans Charged One or More Late Fees	1,319,249		773	
Total Late Fees Collected	1,888,756	\$24,673	2,189	\$42
Total Number of Repossessions Conducted	0		3	
Total Number of Loans Reinstated	30,378		3	
Total Number of Collateral Redeemed	0		1,000	
Total Collateral Sales Resulting in a Deficiency Balance	0	\$0	708	\$30,822
Total Collateral Sales Resulting in a Surplus Balance	0	\$0	193	\$8,681
Total Charge-offs	969,624	\$340,519	709	\$5,543
Average Contracted Term of Loan (In Months)	50		86	

Exhibit H (continued) California Finance Lenders Schedule of Loan Activity Calendar Year 2021 (\$ in thousands)

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

	Automobiles and Other Motor Vehicles		Auto Title	Loans
	Number of Loans	Principal Amount	Number of Loans	Principal Amount
Loans Outstanding at Prior Year End 12/31/2020	330,642	\$3,872,782	44,852	\$137,765
Loans Outstanding at Year End 12/31/2021	1,293,590	\$21,753,081	42,197	\$135,528
Loans with One or More Past Due Payments Which are Past Due 30 or More Days at 12/31/2021	30,544	\$481,764	2,816	\$10,416

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

	Automobiles and Other Motor Vehicles		Auto Title L	oans.
	Number of Loans	Principal Amount	Number of Loans	Principal Amount
Number of Loans Charged One or More Late Fees	449,811		8,179	
Total Late Fees Collected	495,129	\$23,114	18,666	\$247
Total Number of Repossessions Conducted	27,415		2,839	
Total Number of Loans Reinstated	5,618		66	
Total Number of Collateral Redeemed	5,730		73	
Total Collateral Sales Resulting in a Deficiency Balance	2,738	\$33,154	554	\$1,316
Total Collateral Sales Resulting in a Surplus Balance	1,284	\$6,885	129	\$314
Total Charge-offs	26,819	\$265,373	2,002	\$7,147
Average Contracted Term of Loan (In Months)	51		39	

Exhibit H (continued) California Finance Lenders Schedule of Loan Activity Calendar Year 2021 (\$ in thousands)

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

	Real Property		Other Se	curity
	Number of Loans	Principal Amount	Number of Loans	Principal Amount
Loans Outstanding at Prior Year End 12/31/2020	336,600	\$106,388,410	46,498	\$7,669,221
Loans Outstanding at Year End 12/31/2021	17,219,756	\$129,880,139	46,974	\$10,051,209
Loans with One or More Past Due Payments Which are Past Due 30 or More Days at 12/31/2021	14,547	\$4,824,432	1,320	\$360,027

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

100000.0011011	t Tour Loui Tionvity	rtear reporty ar	ia Guilor Godanity	
	Real Property		Other Sec	urity
	Number of Loans	Principal Amount	Number of Loans	Principal Amount
Number of Loans Charged One or More Late Fees	83,107		7,115	
Total Late Fees Collected	102,782	\$12,428	7,566	\$1,081
Total Number of Foreclosures/ Repossessions Conducted	5		35	
Total Number of Loans Reinstated	2,637		123	
Total Number of Collateral Redeemed	788		1	
Total Collateral Sales Resulting in a Deficiency Balance	5	\$213	23	\$510
Total Collateral Sales Resulting in a Surplus Balance	83	\$11,680	65	\$7,382
Total Charge-offs	12	\$888	3,059	\$1,381
Average Contracted Term of Loan (In Months)	249		95	

Exhibit I California Finance Lenders Default Rate by Security Type and Size of Loan As of December 31, 2021

Table 9: Consumer Loans Under \$2,500

	Unsecured	Personal Property	Automobiles & Other Motor Vehicles	Auto Title Loans
Total # of Charge-Offs	296,039	188	534	1
Total # of Loans Outstanding	5,538,295	2,285	3,137	25
Current Loans	4,880,959	2,189	2,737	24
1 Payment Past Due	195,285	26	229	1
2 Payments Past Due	143,961	18	72	0
3 or More Payments Past Due	318,090	52	99	0
	Wage Assignments	Other Security	Totals	
Total # of Charge-Offs	0	3,022	299,784	
Total # of Loans Outstanding	0	1,735	5,545,477	
Current Loans	0	1,711	4,887,620	
1 Payment Past Due	0	6	195,547	
2 Payments Past Due	0	2	144,053	
3 or More Payments Past Due	0	16	318,257	

Table 10: Consumer Loans \$2.500 to \$4.999

	Unsecured	Personal Property	Automobiles & Other Motor Vehicles	Auto Title Loans
Total # of Charge-Offs	36,852	245	930	1,531
Total # of Loans Outstanding	253,417	3,125	11,061	25,727
Current Loans	212,320	2,924	9,437	23,086
1 Payment Past Due	17,315	37	778	1,460
2 Payments Past Due	6,626	35	301	413
3 or More Payments Past Due	17,156	129	545	768
	Wage Assignments	Other Security	Totals	
Total # of Charge-Offs	0	4	39,562	
Total # of Loans Outstanding	0	714	294,044	
Current Loans	0	692	248,459	
1 Payment Past Due	0	8	19,598	
2 Payments Past Due	0	3	7,378	
3 or More Payments Past Due	0	11	18,609	

Exhibit I (continued) California Finance Lenders Default Rate by Security Type and Size of Loan As of December 31, 2021

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

	Unsecured	Personal Property	Automobiles & Other Motor Vehicles	Auto Title Loans
Total # of Charge-Offs	30,651	161	1,699	376
Total # of Loans Outstanding	281,871	4,146	30,858	8,331
Current Loans	241,165	4,032	27,744	7,306
1 Payment Past Due	22,502	29	1,690	696
2 Payments Past Due	6,100	18	479	153
3 or More Payments Past Due	12,104	67	945	176
	Wage Assignments	Real Property	Other Security	Totals
Total # of Charge-Offs	0	3	7	32,897
Total # of Loans Outstanding	0	1,511	1,040	327,757
Current Loans	0	1,457	1,013	282,717
1 Payment Past Due	0	2	11	24,930
1 Payment Past Due 2 Payments Past Due	0	2 25	11 6	24,930 6,781

Table 12: Consumer Loans \$10,000 or More					
	Unsecured	Personal Property	Automobiles & Other Motor Vehicles	Auto Title Loans	
Total # of Charge-Offs	606,082	115	23,656	94	
Total # of Loans Outstanding	133,770	58,150	1,202,068	1,580	
Current Loans	126,860	57,456	1,172,777	1,350	
1 Payment Past Due	3,821	259	20,691	149	
2 Payments Past Due	1,070	72	5,541	36	
3 or More Payments Past Due	2,019	363	3,059	45	
	Wage Assignments	Real Property	Other Security	Totals	
Total # of Charge-Offs	0	9	26	629,982	
Total # of Loans Outstanding	2	293,188	43,239	1,731,997	
Current Loans	2	281,289	41,935	1,681,669	
1 Payment Past Due	0	1,725	174	26,819	
2 Payments Past Due	0	3,136	311	10,166	
3 or More Payments Past Due	0	7,038	819	13,343	

Exhibit J California Finance Lenders Loans Made Online by Type of Security Calendar Year 2021 (\$ in thousands)

Table 13: Loans Made Online

Total Number of CFL Licensees Making Loans	1,616
Total Number of CFL Licensees Making Online Loans	139
% of CFL Licensees Making Online Loans	8.60%
Aggregate Principal Amount of All CFL Loans Made	\$ 359,593,618
Aggregate Principal Amount of Online CFL Loans Made	\$ 35,060,782
% of Online CFL Loans Made	9.75%

	Number of	% of Total Number to All CFL Consumer		% of Total Amount to All CFL Consumer
Type of Security	Loans	Number	Principal Amount	Amount
CONSUMER LOANS				
Unsecured (Under \$2,500)	26,679,797	99.05	\$3,462,921	10.93
Unsecured (\$2,500 and Above)	123,861	0.46	\$2,586,477	8.16
Personal Property	33,451	0.12	\$1,264,866	3.99
Automobiles & Other Motor Vehicles	13,494	0.05	\$243,683	0.77
Auto Title Loans	7,516	0.03	\$38,366	0.12
Wage Assignments	0	0.00	\$0	0.00
Real Property	57,408	0.21	\$23,899,404	75.42
Other Security	21,324	0.08	\$193,451	0.61
Total Consumer Loans Made	26,936,851	100.00	\$31,689,168	100.00
	Number of	% of Total Number to All CFL Commercial		% of Total Amount to All CFL Commercial
Type of Security	Loans	Number	Principal Amount	Amount
COMMERCIAL LOANS				
Unsecured	15,531	41.85	\$507,514	15.05
Personal Property	3,311	8.92	\$440,620	13.07
Automobiles & Other Motor Vehicles	8,327	22.44	\$62,687	1.86
Business Equipment	981	2.64	\$158,628	4.70
Real Property	3,951	10.65	\$1,915,850	56.82
Other Security	5,009	13.50	\$286,317	8.49
Total Commercial Loans Made	37,110	100.00	\$3,371,616	100.00

Exhibit K Property Assessed Clean Energy (PACE) Program Key Findings Calendar Year 2021

With the signing of AB 1284 in October 2017, a licensing scheme was set forth for Property Assessed Clean Energy (PACE) program administrators. The licensing and regulation of PACE program administrators by the Department of Financial Protection and Innovation (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.

In 2021, the DFPI revoked the license of one PACE program administrator. As of December 31, 2021, there were four PACE program administrators licensed with the DFPI.

As of December 31, 2021, the four licensed PACE program administrators have enrolled 3,499 PACE solicitors and 18,145 PACE solicitor agents.

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

Key Findings

- PACE program administrators reported gross income of \$39.9 million from PACE program assessment financing in 2021.
- The total number of PACE assessment contracts funded and originated by program administrators in 2021 was 5,651 for a total amount of \$201.4 million.
- In 2021, the aggregated total fees and other charges assessed to property owners, excluding interest, was \$18.7 million.
- A total of 134 PACE assessment contracts were canceled by consumers within three or five days of executions in 2021.
- Detail 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>.

Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Key Findings Calendar Year 2021

Other Findings

- A total of <u>1,792 PACE assessments</u> were funded for HVAC systems, boilers, or other temperature regulation systems not in the case of emergency or immediate necessity.
- PACE program administrators reported making a total of one PACE assessment 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 2021 was 91,901 metric tons (MT).
- The number of jobs created in 2021 was estimated to be 2,020.
- The program administrators provided the number of <u>energy</u> and <u>water</u> saving improvement products installed during 2021. 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.

Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Licensing Data Calendar Year 2021

PROGRAM ADMINISTRATOR LICENSING DATA

The table below shows the number of licensed PACE program administrators as of December 31, 2021. 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	2020	2021
Number of Licensed Program Administrators as of December 31	5	5	4
Number of Program Administrators License Surrendered	0	0	0
Number of Program Administrators License Revoked	0	0	1
Number of Licensed Program Administrators as of December 31	5	5	4
Number of Enrolled PACE Solicitors at December 31	6,443	4,513	3,499
Number of Enrolled PACE Solicitor Agents at December 31	51,095	13,099	18,145

Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Violations Found During Examinations Calendar Year 2021

VIOLATIONS FOUND DURING EXAMINATIONS

PACE program administrators are subject to inspection, examination, or investigation by the Commissioner. The information provided in this section was obtained from regulatory examinations the DFPI conducted of PACE program licensees from January 1, 2021, through December 31, 2021. 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

Table 15: Number and Type of Viola	CFL	SHC			
	Section	Section	2019	2020	2021
Making consumer loans without being licensed as finance	22100(a) &				
lender or broker	22689(c)	5898.18	1	0	0
Failure to update principal officers	22105		0	1	1
	22161 &	5923(c) &			
Provided false and misleading dealer fee disclosure	22689(c)	5926	0	2	1
Provided false and misleading post funding inspection	()				
finding	22161(a)		0	1	0
Provided false and misleading information to the property owner	22161(a)(2)		1	0	0
Failure to offer fee advertised to the property owner	22161(a)(3)		1	0	0
Failure to disclose licensing authority	22162(b)		0	1	1
Failure to report PACE solicitor as enrolled	22680(a)		1	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	22680(e) &				
maintain the required minimum qualifications	(g)		0	1	1
Failure to provide proof that PACE solicitor agents have completed and	(9)				
passed the test of the introductory training	22681(b)		1	0	0
· · · · · ·			•		
Inadequate policies and procedures in responding to consumer complaints	22683		0	2	1
	22000			_	•
Approving ineligible home improvement contracts	22684 (a)(b)	0	1	1
Exceeded maximum amount financed allowed	22684(h))	0	0	1
The term of the PACE assessment contract exceeded the estimated useful	` '				•
life of the measure attributed to greatest portion of funds	22684(j)			0	1
Failure to utilize at least three automated valuation models	22685(a)(1)	\		2	1
Failure to disclose property market value	22685(b)		0	1	0
Failure to verify whether the assessment contract was executed prior to	22000(b)		U	•	U
work commencement	22686		2	2	1
Failure to determine that property owner has an ability to repay the annual	22686 &				
PACE assessment payment	22687		2	2	0
Emergency waiver of ability to repay requirements granted for ineligible	22001		2	2	U
agreements	22687		0	2	1
Failure to obtain monthly household expense information from property	22001		U		'
owner	22687(a)(1)		0	1	1
Failure to confirm the amount and sources of property owner's income	22007 (a)(1)		U	1	
during the oral confirmation of key terms call	22687(a)(6)		1	1	0
Failure to verify that price of PACE finance project is not different from paid	22001 (a)(0)		'		U
in cash price	22689(c)	5926	1	2	1
Refinancing ineligible PACE assessment contract	22689(c)	3920	1	0	0
Treillianding ineligible FAOL assessificit Contract	22009(C)		ı	U	U
Disclosing the property owner's eligible amount of funds to the contractor	22689(c)	5925	1	0	0
	, ,			U	U
No evidence that property owner agreed to receive electronic copy of		5898.16(b)(1)			
document in lieu of printed copy	22689(c)	5898.17(a)	2	2	1
Failure to inform property owner of applied administrative fee in		5555 (a)	2		1
Failure to inform property owner of annual administrative fee in	22690(6)	5012(0)(2)	0	0	1
confirmation terms call	22689(c)	5913(a)(2)	0	0	1
Failure to retain term confirmation call	22689(c)	59	0	1	ı
Failure to confirm the assessment contract and financing estimate and	00600(=)	5902(g) &	0	0	4
disclosure to all property owners	22689(c)	5913 5898.16(b)	2	2	1
		DAYA IN(N)			
Failure to provide the Right to Cancel in required format	22689(c)	(1)(A)	0	0	1

Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Complaint Information Calendar Year 2021

COMPLAINT INFORMATION

In 2021, a total of 69 complaints were received by the DFPI related to PACE program administrators, PACE solicitors, and/or PACE solicitor agents. The tables below summarize issues covered in the complaints.

Table 16: PACE Program Related Complaints

	2019	2020	2021
Total number of complaints received	157	169	69
Total number of complaints awaiting resolution	53	12	2
Total number of complaints resolved	104	157	67

Table 17: Complaints by Complaint Reason

	2019	2020	2021
Administrative issue	1	1	0
Advertising issue	0	2	1
Fraud allegation	4	16	4
Identity theft allegation	4	1	0
Investment fraud allegation	2	0	0
Mishandled transaction	14	7	3
Omission or misrepresentation of facts in application	4	3	0
Overcharges	0	3	1
Payment dispute	36	26	13
Poor customer service	0	6	0
Unethical behavior or tactics	70	80	42
Other*	22	24	5

^{*}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 Recommendations for Improving Program Calendar Year 2021

RECOMMENDATIONS FOR IMPROVING PROGRAM

Currently, there are four PACE program administrators licensed with DFPI.

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

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

Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Financing Activities Calendar Year 2021

LICENSING DATA

APPENDIX

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

Table 18: Number and Aggregate Amount of Assessment Contracts Funded

	2019	2020	2021
Total number of PACE assessments	12,335	10,129	5,651
Aggregate amount of PACE assessment funded	\$362,347,433	\$332,517,305	\$201,385,624
Average amount of PACE assessment funded	\$29,376	\$32,828	\$35,637

Table 19: Assessment Contract Term

	2019	2020	2021
Average term of assessment contract (in years)	19.24	20.91	22.58
Median term of assessment contract (in years)	NOT AVAILABLE ¹		25.00

Table 20: Residential Property Data

	2019	2020	2021
Aggregated average market value of property encumbered by mortgage-related PACE assessments	509,451	513,691	572,555
Aggregate median market value of property encumbered by mortgage-related and PACE assessments	NOT AVAILABLE ¹		507,740

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

	2019	2020	2021
Up to 14.999%	12,335	10,129	5,651
15% - 19.999%	0	0	0
20% - 24.999%	0	0	0
25% - 29.999%	0	0	0
30% - 34.999%	0	0	0
35% - 39.999%	0	0	0
40% - 69.999%	0	0	0
70% - 99.999%	0	0	0
At or above 100%	0	0	0
Total PACE assessments	12,335	10,129	5,651

¹ Median cannot be determined based on the data collected.

Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Financing Activities Calendar Year 2021

Table 22: Fees and Other Charges Excluding Interest

	2019	2020	2021
Total fees and other charges assessed to property owners not included in interest rate	\$76,560,696	\$82,549,973	\$18,728,034

Table 23: Number of Assessment Contract Payments Received by Program Administrators from PACE Solicitors²

	2019	2020	2021
Buydown fee			126
Contractor payment	NOT	NOT	511
Seller's points	AVAILABLE	AVAILABLE	211
Other payments			0
Total			848

Table 24: Amount of Payments Received by Program Administrators from PACE Solicitors²

	J		
	2019	2020	2021
Buydown fee			\$482,042
Contractor payment			\$2,289,348
Seller's points	NOT	NOT	\$788,696
Other payments	AVAILABLE	AVAILABLE	\$0
Aggregate amount of payments			\$3,560,086
Average amount of payments			\$4,198
Median amount of payments			\$3,381

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

		1 J	
	2019	2020	2021
Automated valuation model	11,351	9,359	
Appraisal	984	770	NOT
Property valuation not obtained	0	0	AVAILABLE ³
Total PACE assessments	12,335	10,129	

Table 26: Residual Income of the Property Owners

Table 20. Residual moonie	2019	2020	2021
Average monthly residual income of property owners upon entering into assessment contract	\$3,194	\$3,552	NOT AVAILABLE⁴

² Newly added table pursuant to the regulations adopted in 2021.

³ Pursuant to the regulations adopted in 2021, this data is currently only required for delinquent PACE assessments which is summarized in for newly added Table 30.

⁴ Pursuant to the regulations adopted in 2021, this data is currently only required for delinquent PACE assessments which is summarized in for newly added Table 31.

Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Financing Activities Calendar Year 2021

Table 27: Delinquent PACE Assessments

	2019	2020	2021
Total delinquent amount	\$9,971,264	\$7,548,474	\$8,240,635
Average number of missed payments	1.60	1.95	1.87

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

Table 28: Defaulted PACE Assessments

	2019	2020	2021
Total defaulted amount	\$5,034,107	\$4,821,195	\$2,445,762
Average number of missed payments	3.50	4.20	3.67
Total number of parcels defaulted	760	617	288
Average number of years in default	1.56	1.71	1.61
Percentage of defaulted assessments	N/A	N/A	0.41%

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

Table 29: Number of Delinquent PACE Assessments and Mortgage-Related Debt at the time the Assessment Contract was Entered

	2019	2020	2021
Above 97 percent cap on total PACE and			
mortgage-related debt		14	1
87.10 – 97.00 percent cap on total PACE and	NOT		
mortgage-related debt	AVAILABLE ⁵	51	85
Below 87 percent cap on total PACE and			
mortgage-related debt		824	375
Total delinquent PACE assessments		889	461

⁵ The delinquencies required 2018 and earlier data, which CFL Program did not have oversight in 2018 or before. Therefore, this data was not collected in 2019.

Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Financing Activities Calendar Year 2021

Table 30: Method of Determining the Market Value of the Property for Delinquent PACE Assessments⁶

1 7			
	2019	2020	2021
Automated valuation model			396
Appraisal	NOT	NOT	65
Property valuation not obtained	AVAILABLE	AVAILABLE	0
Total delinquent PACE assessments			461

Table 31: Residual Income of the Property Owners for Delinquent PACE Assessments⁶

	2019	2020	2021
Average monthly residual income of property owners upon entering into assessment contract	NOT	NOT	\$43,892
Median monthly residual income of property owners upon entering into assessment contract	AVAILABLE	AVAILABLE	\$21,068

Table 32: Foreclosure Actions (Year 2019)

Number of Foreclosure Actions	ZIP Code	Year of Assessment Contract	Original Amount of the Assessment Contract	Amount Owed upon Foreclosure	Purchased Price Paid for Property at Auction	Amount Recovered
1	94920	2016	\$43,787	\$4,262	\$717,129	\$4,262
1	95204	2016	\$15,599	\$0	\$0*	\$0
1	95204	2016	\$8,593	\$0	\$0*	\$0
1	95688	2016	\$51,505	\$0	\$363,000	\$0
1	93650	2017	\$16,888	\$0	\$335,000	\$0

^{*}Pending sale.

Table 33: Foreclosure Actions (Year 2020)

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

⁶ Newly added table pursuant to the regulations adopted in 2021.

Exhibit K (continued) Property Assessed Clean Energy (PACE) Program Financing Activities Calendar Year 2021

Table 34: Foreclosure Actions (Year 2021)

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	90291	2019	\$199,633	\$18,566	\$4,441,101	\$18,566
1	90291	2020	\$189,042	\$12,473	\$2,380,000	\$205,605

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

	2019		2020		2021	
	Number of	Average	Number of	Average	Number of	Average
Type of Improvement	Improvements	Cost	Improvements	Cost	Improvements	Cost
Central air conditioner	0	\$0	0	\$0	2	\$10,644
Central air conditioner emergency HVAC	13	\$12,028	1	\$12,805	1	\$12,788
Central air conditioner emergency, furnace emergency HVAC	5	\$12,073	0	\$0	0	\$0
Cool roof	1	\$4,000	0	\$0	0	\$0
Duct replacement emergency HVAC	1	\$14,281	0	\$0	0	\$0
Electric tankless water heater	1	\$7,995	0	\$0	0	\$0
Energy efficient	1	\$15,830	39	\$18,211	39	\$17,444
Energy Star windows	0	\$0	1	\$9,500	0	\$0
Furnace emergency HVAC	9	\$10,839	0	\$0	0	\$0
Heating and air conditioning package unit emergency HVAC	1	\$13,564	2	\$8,567	0	\$0
High performance roofing	0	\$0	1	\$14,871	0	\$0
High-efficiency HVAC	2	\$14,273	0	\$0	0	\$0
HVAC	0	\$0	1	\$7,700	0	\$0
Renewable Energy	0	\$0	0	\$0	2	\$29,850
Water conservation	27	\$13,672	2	\$2,054	0	\$0
Water delivery systems	2	\$7,930	0	\$0	0	\$0
Total Improvements	61		47		44	
Total PACE Assessments Funded Under Emergency Procedures in Financial Code section 22687(e)	55*		45*		<u>42*</u>	

^{*}A PACE assessment may include multiple improvements.



California Department of Financial Protection and Innovation

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