



James Johnson
City of Long Beach
Councilmember, Seventh District

~~R-19~~
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Date: February 5th, 2013
To: Honorable Mayor and Members of the City Council
From: Councilmember James Johnson, Seventh District
Councilwoman Gerrie Schipske, Fifth District
Subject: Reforming the California Finance Lender's Law

RECOMMENDATION:

Request that the City Council refer consideration of the California Finance Lender's Law to the State Legislation Committee in order to amend the City's legislative agenda to advocate for the elimination of the loophole that allows for unregulated loans exceeding \$2,500.

DISCUSSION:

The California Finance Lender's Law (CFLL) was established, in part, to regulate the practices of loan agencies. Two purposes of this legislation are "to protect borrowers against unfair practices by some lenders" and "to permit and encourage the development of fair and economically sound lending practices" (California Financial Code, Section 22001). Despite these purposes, the current lack of a regulatory interest rate ceiling on certain types of lending allows for predatory practices that, given the customer base of lending agencies, disproportionately affects lower-income families in times of financial crisis.

This loophole allows lenders to charge unlimited interest on loans of at least \$2,500. These interest rates have been known to exceed 300%, which creates a cycle of lending where new loans are needed to payoff prior balances and the large amount of interest that has accrued due to unlimited rates. The State Legislation Committee should consider advocating for an interest rate cap on these loans in order to protect our residents and residents statewide from such unfair lending practices.

FISCAL IMPACT

This item has no significant fiscal impact.

Wrigley Association
P.O. Box 16192
Long Beach, Ca. 90806
February 5, 2013

Honorable James Johnson
Councilman Seventh District

Re:City Council Agenda 2/5/2013 ITEM #19

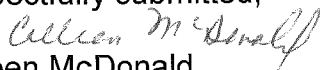
Dear Councilman Johnson:

The Wrigley Association enthusiastically supports Item #19 on tonight's Long Beach City Council agenda:

13-0038 Recommendation to request the City Council to refer consideration of the California Finance Lender's Law to the State Legislation Committee in order to amend the City's legislative agenda to advocate for the elimination of the loophole that allows for unregulated loans exceeding \$2,500."

We applaud you and Councilwoman Schipske for bringing this very important issue back before the council for further action. The Wrigley Association believes that the lack of regulations for loans exceeding \$2,500 allows predatory lending practices which cause financial blight in neighborhoods.

Respectfully submitted,


Colleen McDonald
President, Wrigley Association

BILL ANALYSIS

SENATE BANKING & FINANCIAL INSTITUTIONS COMMITTEE
Senator Lou Correa, Chair
2013-2014 Regular Session

SB 515 (Jackson)
2013

Hearing Date: April 17,

As Amended: April 1, 2013
Fiscal: Yes
Urgency: No

SUMMARY Would make several changes to the California Deferred Deposit Transaction Law (CDDTL; Payday Loan Law), such as increasing the minimum length of deferred deposit transactions; requiring deferred deposit licensees to underwrite deferred deposit transactions and offer installment plans, as specified; capping the maximum number of deferred deposit transactions per customer at four per year; requiring the Commissioner of Corporations (commissioner) to develop and implement a database to help enforce the CDDTL; and making other related changes.

DESCRIPTION

1. Would change the due date of the annual CDDTL report required to be filed by the commissioner, authorize the public release of information submitted by licensees to the commissioner for the commissioner's use in compiling the annual report, and add to the list of information required to be included in the commissioner's annual report. Among the additional information that would be required to be submitted by licensees and included in the commissioner's annual report: the total dollar amount of fees paid by CDDTL customers; the minimum and maximum annual percentage rates (APRs) of deferred deposits; the distribution of the number of days of the terms of deferred deposit transactions; the total number of, and minimum, maximum, and average lengths of installment plans entered into by CDDTL customers; and the number of borrowers entering into each permissible number of deferred deposit transactions, from one transaction to four transactions, during the prior year.
2. Would change the allowable length of deferred deposit transactions from a maximum of 31 days to a minimum of 30 days per each \$100 borrowed by a customer (thus a \$100 loan would have a minimum 30-day term; loans between \$101 and

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\$200 would have a minimum 60-day term; and loans between \$201 and \$300 would have a minimum 90-day term).

3. Would change the schedule of charges and fees that is required to be posted in every physical location of every CDDTL licensee to include 30-day, 60-day, and 90-day APRs for \$100, \$200, and \$300 loans.
4. Would prohibit a CDDTL licensee from entering into a deferred deposit transaction with a customer if the transaction would result in that customer entering into more than four deferred deposit transactions from all California CDDTL licensees during any 12-month period.
5. Would require each CDDTL licensee to underwrite each deferred deposit transaction, and would prohibit a licensee from entering into a deferred deposit transaction if the customer's total monthly debt service payments, at the time of the transaction, across all outstanding forms of credit that can be independently verified by the licensees, including the amount of the deferred deposit transaction for which the customer is being considered, exceed 50% of the customer's gross monthly income.
6. Would provide that, if a customer notifies a CDDTL licensee, on or before the date their account is due to be debited, that the customer is unable or will be unable to repay the transaction when due, the licensee must inform the customer that he or she may convert their transaction into an installment plan. Would further require each CDDTL licensee to convert a deferred deposit transaction into an installment plan, as follows:
 - a. Each agreement for an installment plan would have to be in writing and acknowledged by both the customer and the licensee.
 - b. The licensee would be prohibited from assessing any fee, interest charge, or other charge on a customer, when converting a deferred deposit transaction into an installment plan.
 - c. The minimum length of an installment plan would be 90 days per each \$100 borrowed (thus a \$100 loan would have a minimum 90-day installment plan; loans between \$101 and \$200 would have a minimum 180-day installment

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plan; and loans between \$201 and \$300 would have a minimum 270-day installment plan).

- d. Customers would be allowed to prepay their installment loans at any time, without penalty, fee, or other charge.
 - e. A licensee would be allowed to accept one or more postdated checks for installment plan payments at the time the installment plan is entered into. However, licensees would be prohibited from charging customers any fee for postdated checks that are dishonored. If a customer defaults on his or her installment plan, the licensee would be able to charge that customer a one-time installment plan default fee of \$25.
7. Would require the commissioner, by contract with a third-party provider or otherwise, to develop and implement a common database with real-time access, via an Internet connection, through which CDDTL licensees may determine whether a prospective customer has an outstanding deferred deposit transaction or is in an outstanding installment plan, and whether a prospective customer has reached his or her four loan per year limit.
 8. Licensees would be responsible for doing all of the following with respect to the database:
 - a. Timely and accurately submitting data required by the commissioner before entering into a deferred deposit transaction with a customer. At a minimum, the required information would include the customer's name, social security number or employment authorization alien number, address, driver's license number, transaction amount, transaction date, date the completed transaction is closed, income by category established by the commissioner, zip code where the transaction occurs, and gender.
 - b. Correcting any incorrect data entered into the database.
 9. The database provider would be responsible for doing all of the following with respect to the database:
 - a. Establishing and maintaining a process by which

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licensees may submit information to and obtain information from the database during times the database is inaccessible via the Internet due to technical difficulties.

- b. Take all reasonable measures and comply with all applicable federal and state laws intended to prevent identity theft.
 - c. Provide accurate and secure receipt, transmission, and storage of customer data.
10. The commissioner would be responsible for adopting rules to ensure that the database is used by licensees, in accordance with the bill. Rules would be required to:
- a. Ensure that data are retained in the database only as required to ensure licensee compliance with the bill.
 - b. Ensure that borrower information is deleted from the database on a regular and routine basis, twelve months after a transaction is closed.
 - c. Require the archiving of deleted data.
 - d. Prohibit the database from ranking the creditworthiness of a borrower.
 - e. Require that data collected within the database be used only as prescribed by the commissioner.
 - f. Authorize the imposition of a fee, per transaction, payable by a licensee to the database provider, for data that is required to be submitted. The fee may not exceed the reasonable costs of entering the data into the database and may not include any costs paid by the commissioner to the provider for operating the database. The fee may not be passed on to a customer.
 - g. Allow persons to request reports and data from the database provider, as specified.
 - h. Send written notification to each licensee informing them when the database has been implemented and specifying the date the database shall be considered operational, for purposes of triggering licensees' duty

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to report loan data to the database.

EXISTING LAW

11. Provides for the CDDTL (Financial Code Section 23000 et seq.), administered by the Department of Corporations (DOC). The CDDTL:

- a. Allows lenders licensed under its provisions to defer the deposit of a customer's personal check for up to 31 days; limits the maximum value of the check to \$300; limits the maximum fee to 15% of the face amount of the check; and requires CDDTL lenders to distribute a notice to customers prior to entering into any deferred deposit transaction that includes information about the loan and loan charges and a listing of the borrower's rights.
- b. Requires each CDDTL loan agreement to be in writing in a type size of 10 point or greater, written in the same language that is used to advertise and negotiate the loan, signed by both the borrower and the lender's representative, and provided by the lender to the borrower, as specified.
- c. Allows CDDTL licensees to grant borrowers an extension of time or a payment plan to repay an existing deferred deposit transaction, and prohibits the lender from charging any additional fee in connection with the extension or payment plan.
- d. Prohibits CDDTL licensees from entering into a deferred deposit transaction with a customer who already has a deferred deposit transaction outstanding, and from doing any of the following:
 - i. Accepting or using the same check for a subsequent transaction;
 - ii. Permitting a customer to pay off all or a portion of one deferred deposit transaction with the proceeds of another;
 - iii. Entering into a deferred deposit transaction with a person lacking the capacity to contract;

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- iv. Accepting any collateral or making any deferred deposit transaction contingent on the purchase of insurance or any other goods or services;
 - v. Altering the date or any other information on a check, accepting more than one check for a single deferred deposit transaction, or taking any check on which blanks are left to be filled in after execution;
 - vi. Engaging in any unfair, unlawful, or deceptive conduct or making any statement that is likely to mislead in connection with the business of deferred deposit transactions;
 - vii. Offering, arranging, acting as an agent for, or assisting a deferred deposit originator in any way in the making of a deferred deposit transaction unless the deferred deposit originator complies with all applicable federal and state laws and regulations;
- e. Provides that licensees who violate the CDDTL are subject to suspension or revocation of their licenses, and that violations of the CDDTL are subject to civil penalties of \$2,500 per violation.

COMMENTS

1. Purpose: SB 515 is intended to bring needed reforms to payday lending in California. According to the author's office, the bill targets the specific features of payday loans that cause the most damage to customers, by requiring that lenders evaluate borrowers' ability to pay back their loans, giving borrowers more time in which to repay them, and limiting the number of loans that lenders can make to any one borrower. The bill is intended to bring payday loans into alignment with their advertised purpose of short-term loans for occasional, unexpected expenses.
2. Background: Debates over the merits and dangers of payday loans have been waged in the California Legislature since the state first authorized payday lending in 1996. Consumer advocates believe that payday loans drive borrowers into a

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cycle of repeat borrowing, which harms them more than they are helped by the infusion of borrowed cash. Industry advocates assert that their product offers needed credit to borrowers who have few other options, and cite high rates of customer satisfaction from borrowers who understand the risks and rewards of their product.

SB 515 represents a new approach by consumer advocates to the issue of payday lending in California. Where previously, the groups advocated on behalf of a 36% APR cap, now they are seeking loan limit caps enforced by a payday loan database, longer loan lengths, automatic installment plans, and underwriting. Industry counters that these changes will put them out of business, by significantly increasing their costs without a commensurate increase in allowable fees, and by changing their loans into installment products.

In 2011, the most recent year for which annual data are available on the California payday loan industry, 12.4 million payday loans were made to 1.7 million different customers by payday lenders licensed to operate in California. The total dollar volume of payday loans equaled \$3.3 billion dollars. The average loan was \$263 in size, and average loan length equaled 17 days. In 2011, DOC licensed and regulated 241 payday lenders, operating at 2,119 locations.

Online payday lending is legal in California, as long as the lender holds a CDDTL license from DOC. Although DOC's annual report does not provide a breakdown of payday loans made online by licensed lenders versus those made in licensed storefronts located in California, information contained in recent annual reports strongly suggests that payday loans are increasingly being made online in California. The number of licensed storefront locations at which payday loans can legally be made in California has dropped each year since 2007. This trend occurred over a time period during which the total number of loans and the total dollar volume of loans rose steadily.

Customers who obtain payday loans often have few other borrowing options available to them, when they seek out credit. A study of California payday loan customers conducted during 2007 by the Applied Management and Planning Group, on behalf of DOC, found that a significant number of payday loan customers have not considered other options. When forced to

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consider those options, most payday loan customers said they would turn to family or friends if they were unable to obtain a payday loan. A smaller percentage would wait until their next payday. Other options cited by the survey respondents, in very low numbers, included use of pawn shops and borrowing money from an employer.

Consistent with the responses of survey participants, short-term installment loans in amounts below \$2,500 are not extensively used in California. During 2011, approximately 275,000 loans totaling \$217 million were made. The vast majority of those loans (258,000) were unsecured.

3. Payday Loan Database: SB 515 is the second bill introduced in recent years, which proposes to establish a payday loan database that can be used by DOC to help administer the CDDTL. Two policy issues posed by creation of a database are addressed immediately below. A policy discussion of the remaining elements of the bill is left to the supporters and opponents of this bill (see support and opposition sections below).

a. Database funding: SB 515 is silent on a funding mechanism for the database contemplated by the bill. The author and sponsors indicate that they expect DOC to fund the database through surcharges on licensees - a funding mechanism which requires no additional statutory changes.

Financial Code Section 23016 requires each licensee to annually pay to the commissioner its pro rata share of all costs and expenses reasonably incurred in the administration of the CDDTL. According to DOC, the most recent pro rata assessment imposed on CDDTL licensees equaled \$941 per licensed lending location.

b. Database privacy: This bill requires DOC to develop and implement a payday loan database with real-time access, via an Internet connection, for use by payday loan licensees in complying with this bill, and by DOC for purposes of enforcing this bill.

To date, fourteen other states have established payday loan databases similar to the one envisioned by this bill (Florida, Virginia, South Carolina, Kentucky, Delaware, New Mexico, Illinois, Michigan, Wisconsin, North Dakota, Washington, Alabama, Indiana, and Oklahoma).

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A single company, Veritec, administers the databases in all of those states. Committee staff reached out to representatives of Veritec to ask how they have handled privacy and data breach issues in those other states. They responded that if a Veritec database is breached, the company's responsibilities are covered by existing state and federal data breach laws. Those laws require that the company housing the data notify consumers of the breach and pay for credit monitoring. Veritec's contracts require it to adhere to applicable state and federal laws regarding customer notification following a data breach, and to carry insurance to cover Veritec's costs to comply with those requirements, should Veritec lack the funds with which to do so.

In the states in which Veritec operates, the state payday loan regulator and Veritec are the only entities that have access to all of the data in the database. Typically, these states and Veritec indemnify each other against unlawful use of the database by each of their employees and contractors. Individual payday lenders only have access to data they enter into the database. According to Veritec, lenders are liable for unauthorized access to the database via their portals.

4. Summary of Arguments in Support:

- a. This bill is co-sponsored by the Center for Responsible Lending (CRL), Public Interest Law Firm (a program of the Law Foundation of Silicon Valley), California Reinvestment Coalition (CRC), and National Council of La Raza (NCLR).

CRL believes that the provisions of SB 515, taken together, will align payday loans with their intended purpose as short-term loans, by reducing loan-churning, ensuring that payday borrowers can afford to repay their loans, reducing borrowers' need for additional loans, and otherwise alleviating the harm that payday loans cause. CRL asserts the following four points: 1) Most payday loans go to borrowers caught in a debt trap; 2) Most payday borrowers are regular users of payday loans; 3) For many payday borrowers, there is no way out of the payday lending debt trap; and 4) Very few borrowers take out just one payday loan. CRL believes that payday loans

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do not solve financial emergencies; instead, they leave borrowers worse off than they were before obtaining payday loans. SB 515 targets the problem of the debt trap, by ensuring that borrowers are able to repay their loans without having to borrow again before their next payday.

In its letter of support, CRL cites data from Washington State, which implemented an eight loan per person per year cap in 2010, and saw the volume of payday loans made in that state decrease by 75% in the two years since enactment. CRL believes that this reduction reflects loans that were going to borrowers who were churning their payday loans, and taking out more than eight loans per year. CRL also believes that this limit has led more Washington State borrowers to use payday loans for truly occasional borrowing, as they are marketed. Washington borrowers have saved millions of dollars in fees. But, CRL believes that a cap of eight loans per borrower per year is still too much, and prefers the four loan limit proposed in SB 515.

CRL also support the provisions of SB 515 that give payday borrowers more time to repay their loans, believing that these provisions will make it more likely that borrowers will be able to accumulate the funds to pay off their loans, without having to return to take out new loans.

Finally, CRL cites the underwriting requirements of the bill as important to ensuring that families will avoid the cycle of repeat lending, by ensuring that borrowers are able to repay their loans, without the need to borrow

CRC views SB 515 as necessary to rein in the predatory payday loan industry and protect consumers from the payday loan debt trap. CRC is extremely concerned about the high APRs on payday loans, the inescapable cycle of debt the loans create for borrowers, and the easy accessibility of payday loans, especially to individuals who can least afford the loans. Over the past seven years, CRC has worked with its members, allies, and elected officials in the cities of Oakland, San Francisco, Oceanside, Sacramento, and San Jose to enact local land use policies restricting the growth of payday lenders. CRC asserts that many cities have done what

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they could to limit payday lending, but need the leadership of state representatives to address payday lenders' practices.

The Law Foundation of Silicon Valley, NCLR, myriad other advocacy groups, and at least one local government and one microlender support SB 515 for all of the reasons cited above. These groups believe that payday loans are harmful to the people who use them, and believe that SB 515 will help mitigate the most harmful of the impacts of payday loans on the Californians who use these products.

5. Summary of Arguments in Opposition:

- a. The California Financial Service Providers (CFSP) and Community Financial Services Association of America (CFSA) are opposed to the bill, because it would abolish licensed payday lending in California, and would drive customers to unlicensed, unregulated payday lenders. Among its many provisions, the bill would turn a deferred deposit into an installment product, which is not what a deferred deposit is.

The bill would also impose significant costs on payday lenders, related to underwriting and database support, which would render the product unprofitable, given its current cost structure. The underwriting requirements would not only increase the costs of the product, but would also create enormous liability for lenders and would be extremely intrusive for borrowers. The obligation to establish a database presents a threat to customers' privacy and creates a risk of identity theft.

6. Amendments:

- a. In order to address concerns that the version of the bill before this Committee goes too far, the author and sponsors will offer the following substantive amendments in Committee:
 - i. Delete the underwriting requirements.
 - ii. Delete the requirement that loan

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length be increased to 30 days per \$100 borrowed. Instead, increase the minimum loan length from 14 days to 30 days. According to CRL, Oregon and Virginia both have 30-day minimum length requirements for their payday loans.

iii. Cap the maximum number of loans per borrower per year at six (up from four in the version of the bill before this committee). This compares with a loan cap of five loans per year in Delaware and eight loans per year in Washington State.

iv. Strike the language which allows borrowers to obtain an installment repayment plan if they are unable to pay back any payday loan and replace it with language authorizing payday borrowers to obtain an installment repayment plan only if they are unable to pay back their sixth loan in any year. Require that each installment plan be a minimum of 120 days in length, and provide for the amount owed to be repaid over at least four substantially equal installments, spaced at least 14 days apart, scheduled on or after a borrower's pay date.

v. Require the DOC commissioner to ensure that the payday loan database is fully operational no later than July 1, 2014, and require payday loan licensees to begin reporting to the database within 30 days after the database is certified by the DOC commissioner as being fully operational.

vi. Make a series of technical amendments, to clarify terms, delete superfluous language, and authorize the database provider to charge fees to offset its cost of providing data to people who request it.

b. In addition to the amendments summarized above, which were offered by the author's office and this bill's sponsors, SB 515 requires technical amendments to achieve its intent. The list of technical amendments recommended by staff focuses only on the provisions of the bill that the author is proposing to retain. It does not focus on the provisions the author is proposing to delete from the

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bill.

i. Language is needed to provide delayed operative dates for three provisions of the bill that rely on the existence of an operational payday loan database. These provisions include subdivision (b) of Section 23035 (which applies the payday loan cap), subdivision (b) of Section 23036 (which allows customers to trigger an installment plan if they cannot pay back their sixth and final payday loan of the year), and subdivision (c) of Section 23036 (which prohibits licensees from entering into a new payday loan with a customer who has an existing outstanding payday loan or outstanding installment plan).

Staff suggests the addition of language to the bill, providing that these provisions will become operative on the same date that licensees' requirements to begin submitting data to the database become operative.

ii. Staff also suggests that this bill's author and sponsors are overly optimistic about the ability of DOC to contract out for, test, and bring an operational database online by July 1, 2014. Expecting licensees to enter data into that database within one month of the database coming online is also highly optimistic.

DOC is in a much better position than Committee staff to offer reasonable timeframes for contracting out, testing, and bringing the database online, and for requiring licensees to begin entering data into that database. Until input from DOC can be obtained on these issues, staff suggests an implementation date for the database of at least one year from the bill's operative date (January 1, 2015) and an additional 90 day period (April 1, 2016) to give licensees time in which to train their branch employees in how to use the database, before requiring data to be entered into it on a regular basis.

iii. Technical amendments are also necessary to address the issue of database entries by

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licensees who go out of business or have their licenses revoked by DOC. The bill's existing language on this topic is unclear (page 12, lines 20 through 29). Staff understands that the author's office is working with DOC on language to clarify this issue.

iv. The author may also wish to include language, clarifying the liability of the commissioner, in the event of a database data breach, which occurs despite the existence of policies and procedures intended to prevent it.

7. Selected Prior and Related Legislation:

- a. AB 365 (Lowenthal), 2011-12 Legislative Session: Would have directed the Commissioner of Corporations to establish a payday loan database. Never taken up by the author.
- b. AB 7 (Lieu, Chapter 358, Statutes of 2007): Gave DOC the authority to enforce specified federal protections, including a 36% APR cap, which were granted to members of the military and their dependents.
- c. SB 898 (Perata, Chapter 777, Statutes of 2002). Enacted the Deferred Deposit Transaction Law and shifted the responsibility for administering the law to DOC.
- d. SB 1959 (Calderon, Chapter 682, Statutes of 1996): Enacted the earliest version of a payday lending law in California. Gave regulatory authority to the California Department of Justice.

LIST OF REGISTERED SUPPORT/OPPOSITION

Support

Center for Responsible Lending (co-sponsor)
 California Reinvestment Coalition (co-sponsor)
 National Council of La Raza (co-sponsor)
 Public Interest Law Firm/Law Foundation of Silicon Valley
 (co-sponsor)
 Opportunity Fund
 Affordable Housing Network

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Affordable Housing Services
Alliance of Californians for Community Empowerment
Asian Americans for Community Involvement
Asian Law Alliance
Asian Pacific Policy and Planning Council
Black Economic Council
California Association for Micro Enterprise Opportunity
California Capital Financial Development Corporation
California Church IMPACT
California Labor Federation
California/Nevada Community Action Partnership
Catholic Charities of California United
CCCS Financial Resource Center
CHAM Deliverance Ministry
Civic Center Barrio Housing Corporation
Coalition for Quality Credit Counseling
Community Housing Council of Fresno
Community HousingWorks
Community Legal services in East Palo Alto
Courage Campaign
Dennis Herrera, San Francisco City Attorney
Dolores Huerta Foundation
EARN
East L.A. Community Corporation
East Palo Alto Community Legal Services
Economic Partners in Change
Fair Housing Council of San Fernando Valley
Fair Housing Napa Valley
Faith in Community
Jose Cisneros, Treasurer, City and County of San Francisco
Housing and Economic Rights Advocates
Housing Equality Law Project/Human Equality Law Project
Housing Opportunities Collaborative
Housing Rights Center
Insight Center for Community Economic Development
Latino Business Chamber of Greater Los Angeles
League of United Latin American Citizens
Mexican American Legal Defense and Educational Fund
Mission Asset Fund
Mission Economic Development Agency
Mission San Francisco Community Financial Center
Multicultural Real Estate Alliance for Urban Change
Mutual Housing California
NAACP, San Jose Chapter
National Asian American Coalition
NEW Economics for Women

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Novadebt
Nuestra Casa
Oakland Community Organizations
Opportunity Fund
Pacific Islander Initiative
Pan American Bank
PICO California
Public Counsel
Public Law Center
Sacred Heart Community Service
Santa Clara County Board of Supervisors
Santa Clara County La Raza Lawyers Association
San Diego City-County Reinvestment Task Force
Somos Mayfair
Sonoma County Housing Advocacy Group
St. Joseph's Family Center
Sunnyvale Community Service
Training Occupational Development Educating Communities Legal
Center
Valley Economic Development Center
Watts/Century Latino Organization
Western Center on Law & Poverty
Youth Leadership Institute

Opposition

California Financial Service Providers
Community Financial Services Association of America
Greater Riverside Hispanic Chamber of Commerce

Consultant: Eileen Newhall (916) 651-4102

