INSIGHT.
Center for Community Economic Development

Tools for Advocates of Limiting Payday Lending:

How your community can limit payday lending through municipal land-use and other ordinances

By Tim Lohrentz

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About the Insight Center

The Insight Center for Community Economic Development, formerly the National Economic Development and Law Center (NEDLC), is a national research, consulting and legal organization dedicated to building economic health in disenfranchised communities. The Insight Center's multidisciplinary approach utilizes a wide array of community economic development strategies including promoting industry-focused workforce development, building individual and community assets, establishing the link between early care and education and economic development, and advocating for the adoption of the Self-Sufficiency Standard as a measurement of wage adequacy and as an alternative to the Federal Poverty Line.

The Insight Center works to create lending alternatives to payday lending and to create payday lending laws and ordinances at the state and local level that are consistent with community economic development principles.

For more information, visit www.insightcced.org.

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Introduction

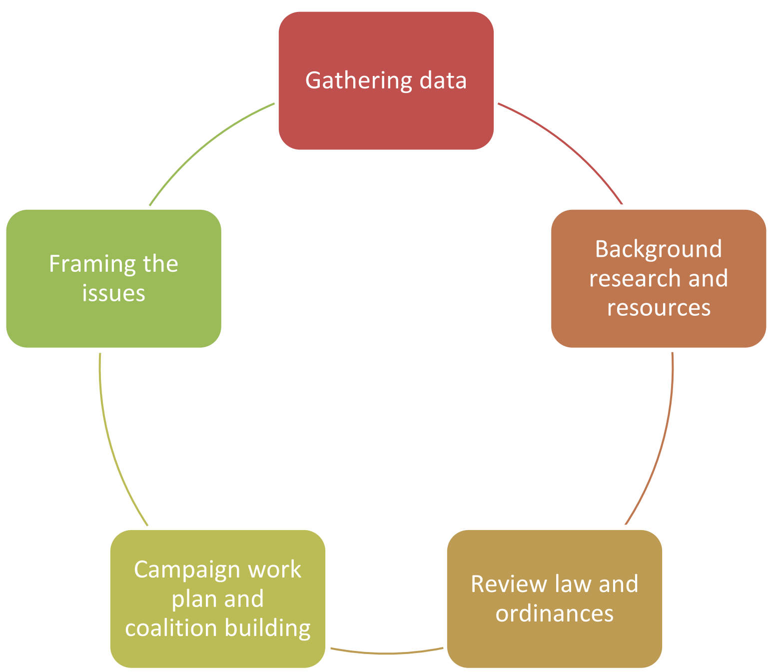
How your community can limit payday lending through land-use and other ordinances

The primary purpose of the toolkit is to create a set of tools for organizers and advocates of measures to limit payday lending. The toolkit will be online and in booklet form. But before getting into the specifics of the toolkit, we wish to articulate the fundamental problem with payday lending: it creates a debt trap in which the average borrower is taking out repeat loans for months just to pay off the first loan, each time paying the high interest rate but receiving no new cash (each loan goes to pay off the previous loan). The average payday customer takes out an average of eight to ten consecutive loans.

Payday loans are regulated, in most cases, at the state level, which means that the only way that counties or cities can affect payday lending is through land-use ordinances. The toolkit provides a guide to advocating for a local ordinance to limit new or relocating payday establishments.

Tools to Help in Your Local Payday Lending Campaign:

- Gathering key data – demographic and payday lending
- Identification of key background research
- Review of California law and sample ordinances from around the state
- Creating a campaign work plan
- Framing the issues
- Coalition building for payday lending
- Resources: Key contacts, financial education materials



Gathering Key Data

There are four kinds of data that can be very effective in a campaign to limit payday lending establishments at the local level.

- The number of payday lending establishments per capita and the location of payday lending establishments in order to see where payday lending companies have targeted up to this point and where they may be targeting in the future.
- The location of the headquarters of the payday lending establishments.
- The demographics of the neighborhoods or cities where payday lending establishments are located. This may help determine when a jurisdiction should add specific distance requirements to an ordinance and can determine if certain types of neighborhoods might be targeted directly or indirectly by payday establishments.
- Testimonies from customers of payday lending in order to personalize the impact.

In order to gather the first three data items on the list it is necessary to determine the location and names of the payday lending establishments in a given geography.

How to Determine the APR of a Payday Loan:

Before going to the gathering of payday lending locations, it is helpful to review how one determines the Annual Percentage Rate (APR) of a payday loan. We will use California as an example.

APR = simple interest X number of terms per year

Simple interest rate: $45 interest on $255 loan = 17.65% interest (45 / 255)

Terms per year: 365.25 days per year by 14 day minimum term = 26.09 (365.25 / 14)

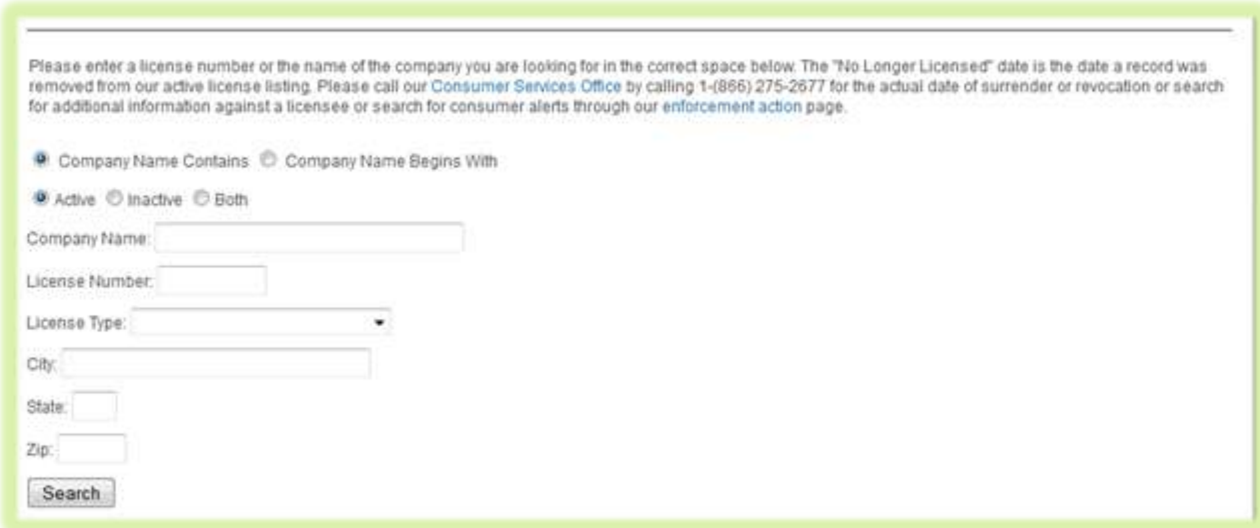
APR = simple interest X number of terms per year = 17.65% x 26.09 = 460%

For terms per year, some people in California use 52 weeks per year by a two-week minimum term, which equals 26.00, leading to an APR of 459%. In fact there are 52 weeks plus 1 1/4 days in a year, although the resulting APR varies only slightly.

Identify Payday Lending Establishments

In California the place to gather payday lending establishment data is the licensing body, the Department of Corporations. Their website http://www.corp.ca.gov/FSD/licensees/default.asp lists the address, license number, address of the licensed facility, and date of the license. The payday lenders are called deferred deposit. Many are also California Finance Lenders, referring to other types of financing that they provide.

Below is a screen shot of the Department of Corporations search engine.


Please enter a license number or the name of the company you are looking for in the correct space below. The "No Longer Licensed" date is the date a record was removed from our active license listing. Please call our Consumer Services Office by calling 1-(866) 275-2677 for the actual date of surrender or revocation or search for additional information against a licensee or search for consumer alerts through our enforcement action page.

Company Name Contains   Company Name Begins With

Active   Inactive   Both

Company Name:

License Number:

License Type:

City:

State:

Zip:

Search

How You Might Use the State Database:

Here are some scenarios with explanations of how to use this search engine:

- If you want to look up a specific payday lender put in either the “Company Name” or the “License Number”. You can leave the rest of the fields blank but usually the “City” is best to add in case there are many establishments with the same name in various cities. The company name may vary slightly from the name of the payday storefront. If you have trouble finding it search on the city and leave the Company Name blank.
- If you want a list of all of the payday lenders in a city you would highlight or keep highlighted the button that says “Active” and leave “Company Name” and “License Number” blank. For “License Type” click on “Deferred Deposit Originator”. Then also complete the City and State boxes. You can copy and paste the results into a word document or excel spreadsheet or simply reenter the results.
- If you want a list of all the payday lenders in a county you will need to repeat the process outlined above for every city in the county. There are many ways to get a list of cities in the county, including the Wikipedia entry for the county – look for incorporated places. For example, here is the list for Santa Clara County: http://en.wikipedia.org/wiki/Santa_Clara_County,_California#Incorporated_cities_and_towns. It is recommended that you compare the list of incorporated places against a zip code listing to add to the list any unincorporated places that are listed as a place by the post office. Payday lenders could be located in these unincorporated zip code areas. Here is one example of a zip code list - http://www.mapszipcode.com/california/county/sanmateo for San Mateo County. A person can find more sources of zip code lists with an internet search.

There are two other types of licensees that you may check because they often overlap with payday lenders. These are Check Sellers and California Finance Lender, which includes financial lenders and brokers. As a finance lender, a payday lender would have a number of other financing options to offer a client in addition to a payday loan. This dual status may provide more legitimacy to the payday lender in the eyes of some. On the other hand, there are many finance lenders who are not payday lenders.

Test the payday lender information with local partners to see if the list of licensees matches what people know to be the reality.

Determining the Number of Establishments Per Capita

How to Compare San Jose and Gilroy or Redwood City and Menlo Park

One way to compare various cities within a county or region is to standardize the number of payday establishments by calculating the number per capita – specifically the number of establishments per 100,000 persons. This is helpful because it can indicate if the city has been targeted by the payday lending industry or if its demographics, economy, or other factors have caused there to be a high or low number of payday lending establishments. On the other hand, if other demographic measures indicate a potential market area for payday lenders yet the per capita measure is low, it could suggest a city ripe for new establishments, and where an ordinance could be especially urgent.

The following table demonstrates how you can organize the data on the number of payday lenders and the per capita measure. Use the Quick Facts box on the front page of the https://www.census.gov/ website to find the latest population for any city. Then use the following formula to calculate the payday establishments per 100,000 persons: (# of establishments X 100,000) / population.

Number of Payday Lenders per 100,000 persons, Northern San Mateo County, 2011

	Number of listed active payday lenders	Population	Payday establishments per 100,000
Daly City	5	101,514	4.93
Millbrae	1	20,800	4.81
Pacifica	3	37,739	7.95
San Bruno	3	40,315	7.44
San Mateo	4	92,256	4.34
South San Francisco	3	62,502	4.80

The per capita measure can be very useful with city council people, especially when the city is at one extreme or the other of the per capita measure. For example, Pacifica has the highest per capita rate in the county and city officials may not want their city to be known as the "payday lending capital" of San Mateo County. San Mateo, with the lowest rate on the list, could be a prime target for a new establishment by payday lending chains.

Location of the Payday Lending Headquarters

Who's Profiting over the Payday Lending in the Community?

One piece of information that might help convince local officials to limit the number of payday lenders is to document the number of payday lenders that are located out of state. This helps to counter the argument that payday lenders are somehow a benefit to the local economy. The IMPLAN economic modeling software estimates that 9% of the revenue of unchartered financial institutions (i.e. from interest payments) goes to owner income. For some payday lenders it could be higher than that. In addition some of the employee salaries and taxes and establishment spending and taxes will go out of state.

The first step is to do research on the payday lender by going to their website. If there is no website there is a good chance that it is locally owned. In many cases the website will have contact information for the owner or corporate headquarters. In some cases a California corporate headquarters is listed, but it is actually a subsidiary of a larger out-of-state corporation. Doing a search for "parent company" + #Name of Subsidiary can sometimes result in finding the parent company.

Often doing the website research might result in locating only a portion of the payday lenders. It is recommended to use a business database to complete the research. Try to locate an organization with access to a Dun and Bradstreet, Hoovers, or Infogroup Reference USA subscription. Alternately, most libraries will have one or more of these databases. The business databases will quickly tell one where the headquarters or owner of a payday lending establishment is. Usually the database will also specify the size of the corporation in terms of sales volume, which is equal to the total fees charged by the payday lender. It is a good idea to double-check the information you gathered in the website search with the business database information.

To provide an example of how this information can be arranged, here is a table from San Mateo: One piece of information that might help convince local officials to limit the number of payday lenders is to document the number of payday lenders that are located out of state. This helps to counter the argument that payday lenders are somehow a benefit to the local economy. The IMPLAN economic modeling software estimates that 9% of the revenue of unchartered financial institutions (i.e. from interest payments) goes to owner income. For some payday lenders it could be higher than that. In addition some of the employee salaries and taxes and establishment spending and taxes will go out of state.

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To provide an example of how this information can be arranged, here is a table from San Mateo:

San Mateo County Payday Lenders by Location of Ownership, 2011

	Number of licensed payday lending establishments	Local owner (1-3 stores)	California-based chain	Out-of-state based chain
Belmont	1	0	1	0
Daly City	5	3	0	2
Half Moon Bay	1	1	0	0
Milbrae	1	0	0	1
Pacifica	3	1	0	2
Redwood City	3	0	1	2
San Bruno	3	0	2	1
San Mateo	4	1	2	1

	Number of licensed payday lending establishments	Local owner (1-3 stores)	California-based chain	Out-of-state based chain
South San Francisco	3	0	1	2
San Mateo County	**24**	**6**	**7**	**11**

This table indicates that Pacifica, Redwood City and South San Francisco each have three payday establishments, two of which are large out-of-state corporations. This is higher than the overall ratio. In each place advocates could argue that an especially high amount of the loan interest is going out of state and not benefitting the local economy. [Technically there is a loss to the economy even if all the payday lenders are local because the money taken out of households due to the high interest rate causes a bigger loss to the economy than the impact on the economy of that same money circulating within the payday lending industry.]

Demographics Where Payday Lenders are Located

Who Are the Payday Lenders Targeting?

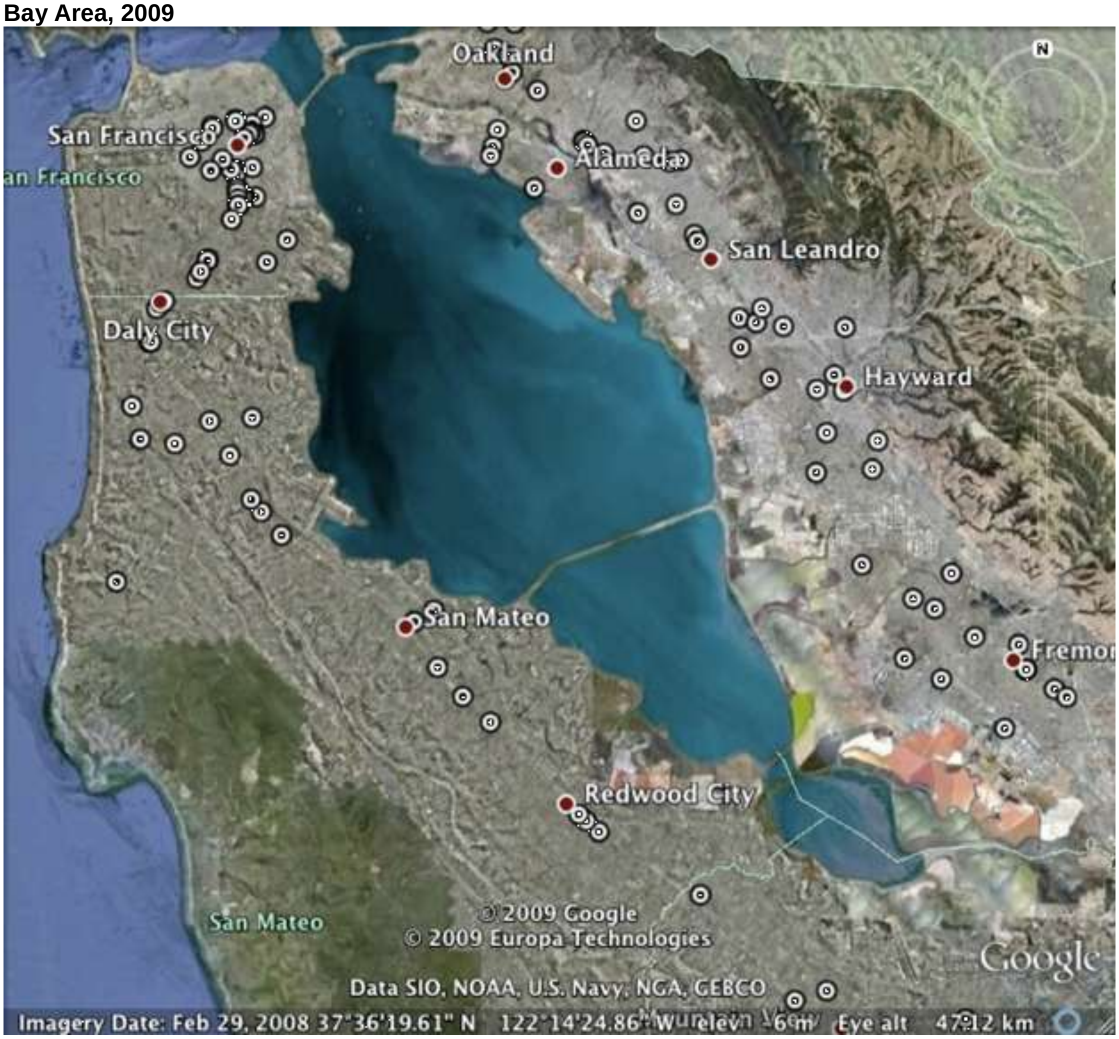
There is value in conducting demographic research to analyze the demographics of the neighborhoods where payday lenders are located. This can help provide evidence to city council persons and other influential people that the payday lenders are targeting based on certain social or economic factors. There is a thin line between marketing and targeting when it comes to payday lending and it depends whether you consider these establishments to be providing legitimate access to capital or are a predatory lender. For purposes of this toolkit we will use the term targeting. The targeting could be based on income, race or other demographics.

There are two ways to analyze the interaction between a region's demographics and the location of payday lending establishments:

1. Maps created by a geographic information system (GIS)
2. Tables which compare the census tracts with payday establishments to the city or region as a whole (or, preferably, to the census tracts without payday establishments)

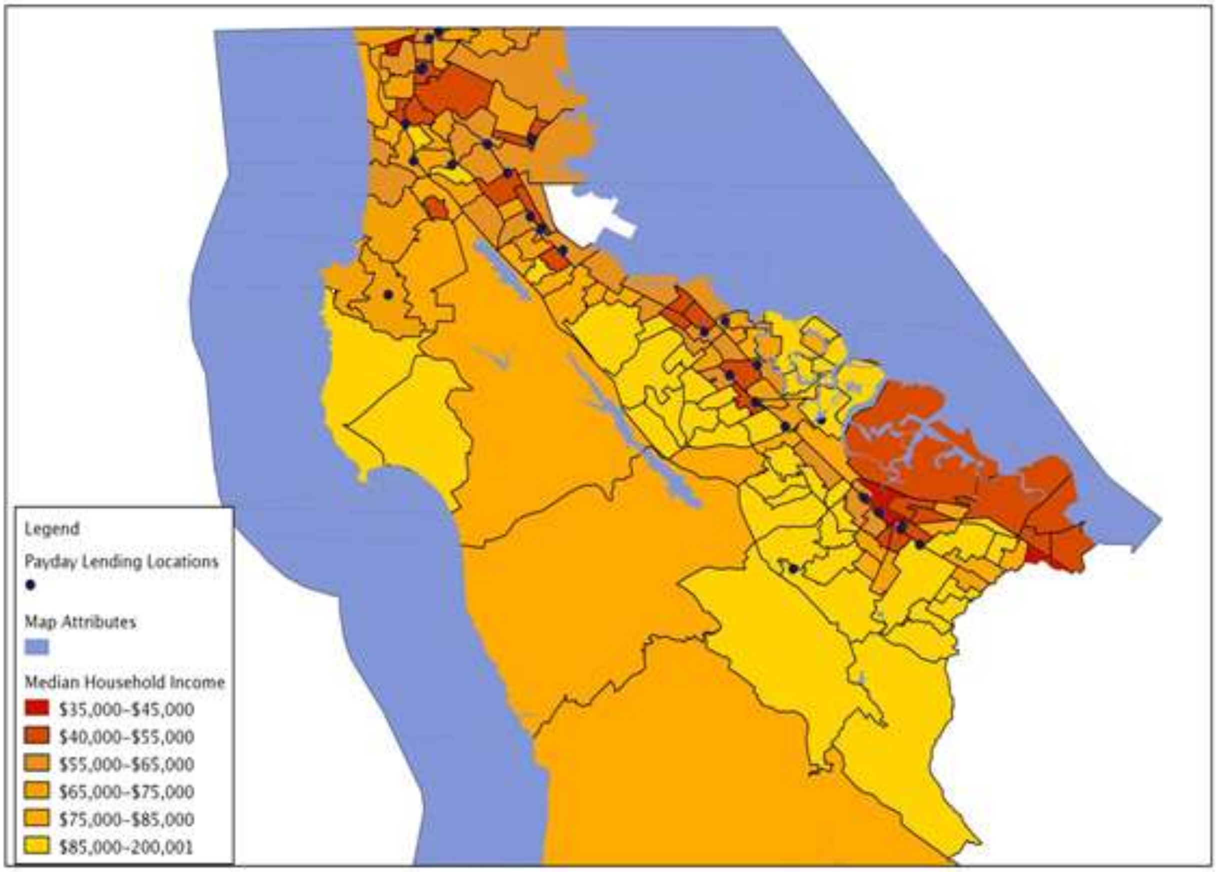
The best way to examine the question of targeting is by creating maps with the location of the establishments and various demographic layers or to compare the density of establishments throughout a region. For example, this 2009 map compares the density of payday establishments in parts of Alameda, San Francisco, and San Mateo counties. It does not compare payday establishments to local demographics. Our sample analysis of the spatial distribution of payday lending establishments is that they are most heavily concentrated in portions of San Francisco. (Some of these areas were included in the five zones where the city excluded payday lending.) One can think of the Daly City payday lenders as an extension of the payday lending concentration along Mission Street in San Francisco. In the East Bay there is a consistent presence of payday establishments in Oakland, Alameda, San Leandro, Hayward, and Fremont.

Figure 1: Example of Analysis on Spatial Distribution of Payday Lending Establishments in a Portion of the Bay Area, 2009



The location of payday lending establishments can also be placed on top of (overlay) a demographic layer of the map. This is done with a GIS system, such as ArcGIS. The next map (Figure 2) compares the location of payday establishments in San Mateo County with the household median income. Most of the payday establishments are located in the lower-income red-toned census tracts, which are either the census tracts with median income between $35,000 and $45,000 or those with median income between $45,000 and $55,000.

Figure 2: Licensed Payday Lenders and Household Median Income, 2009, San Mateo County

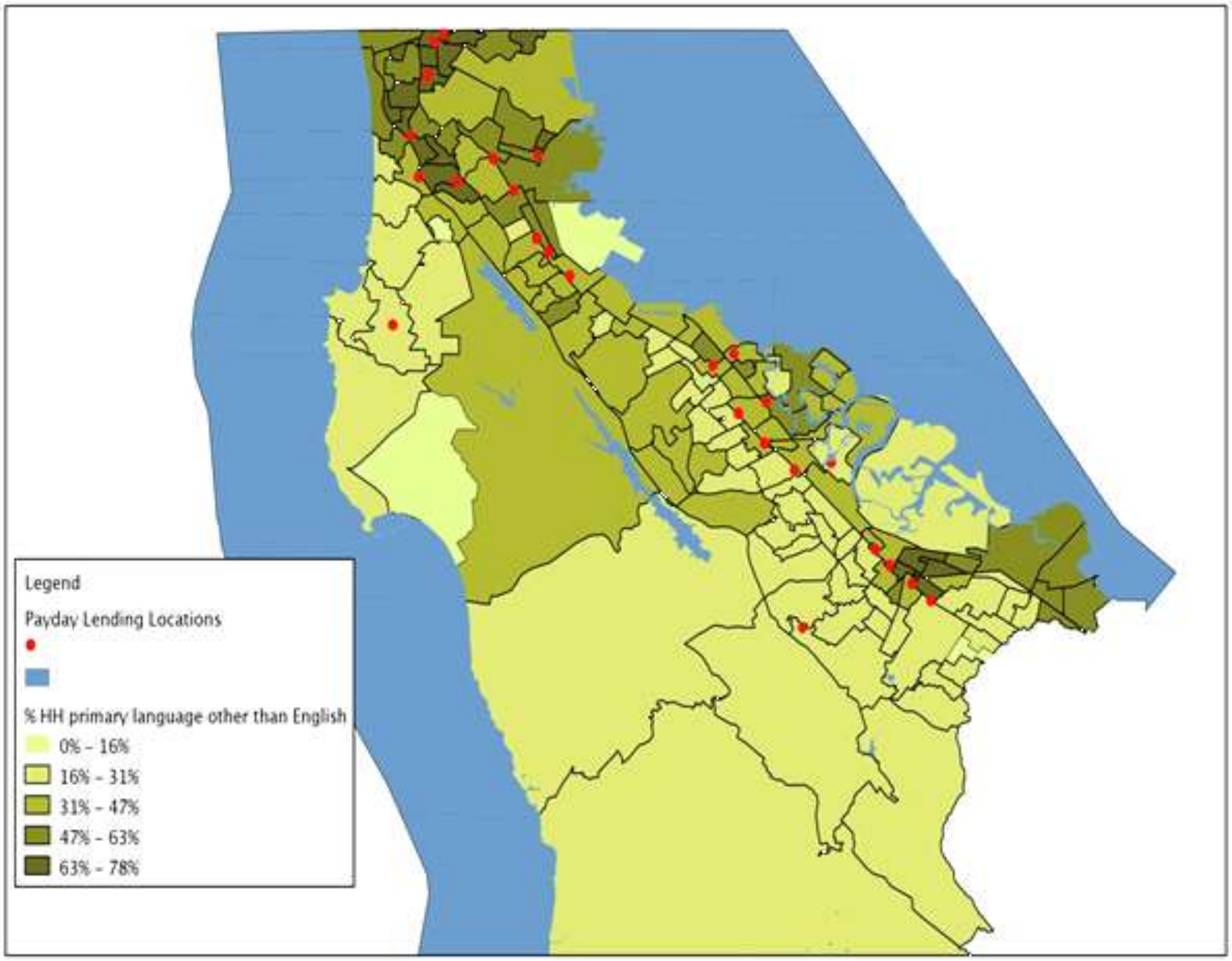


Source: Ellen Love, Insight Center, based on California Department of Corporations Licensee Listing, US Census 2000. White area represents San Francisco airport (no population).

To prepare the GIS maps, one needs to geocode (assign latitude and longitude) to each payday establishments. The GIS system will do this once you have a street address for each establishment. You will also need to download readily available census tract GIS data that includes the desired census data for each census tract.

Another GIS example is Figure 3 which shows the percentage of households with a primary language other than English and the location of payday establishments for San Mateo County. There appears to be a correlation between non-English speakers and payday lending establishments. This can be seen in the northern part of the county as well as in Redwood City in the south.

Figure 3: Payday Establishments and the Percent of Households Reporting A Primary Language Other than English, 2009, San Mateo County



Source: Ellen Love, Insight Center, based on California Department of Corporations Licensee Listing, US Census 2000.

How to Gather Census Tract Data

Making the Case that Payday Lenders are Targeting Vulnerable Parts of the Community

The census data of areas with a high concentration of payday lenders can help make the case that payday lenders are targeting immigrants, people of color, women headed households, etc. How can you gather and organize that information?

Bay Area Census has a good website with a summary of resources to work with census data at the local level including census tracts: http://www.bayareacensus.ca.gov/small/small.htm. Or you can go directly to the U.S. Census website. You can identify the census tract (or block group or block) of a payday lending establishment by using this census URL: http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?ref=addr&refresh=t . Click on the census tract number. This will add the census tract to the selected geographies. Continue to identify the census tract of each payday lender in the city. Select each distinct census tract. If more than one payday establishment share a census tract, the census tract only needs to be selected once.

Click on the “Name” tab in the Select Geographies box. Click on “City or Town” (or county, if that is the geography you are working with. Type in the name of the city or county in the entry box. The name of the city you want will pop up, most likely before you are done typing. Click on it and then click on “Go”. In the results area, click on the box to the left of the desired city and then click “Add”. Now in the “your selections” area in the top left corner you should see the name of the city and each desired census tract. When finished, close the “Select Geographies” box.

For census tracts, the best tables to use are from the 5-Year ACS survey: DP02 Select Social Characteristics, DP03 Select Economic Characteristics, DP04 Select Housing Characteristics, and DP05 ACS Demographic and Housing Estimates. The following variables may be useful to determine if the payday lenders are targeting certain demographic groups. You may also choose other variables.

From DP02 Selected Social Characteristics:

- *Percentage of Family Households with own Children Under 18.* Determine the percentage by taking the number of family households with own children under 18 and dividing by the number of family households, under Households by Type.
- *Percentage of Female-Headed Family Households, no Husband Present.* Determine the percentage by taking the number of female-headed family households and dividing by the number of family households, under Households by Type.
- *Average Household Size,* under Households by Type.
- *Separated or Divorced*, found in the Marital Status section. First, add the two percentages “Separated” and “Divorced” for males and the two percentages “Separated” and “Divorced” for females. Second, divide the total from step one by the sum of Males 15 years and over and Females 15 years and over.
- *Bachelor’s or Graduate Degree*, found in Educational Attainment (25 years and over) section. Add the two percentages Bachelor’s Degree and Graduate Degree.
- *Percentage Foreign Born,* under Place of Birth.

From DP03 Selected Economic Characteristics:

- *Unemployment Rate,* under Employment Status
- *Median household income*, under Income and Benefits
- *Percentage of Households with Less than $50,000 income*, found in Income and Benefits section. Add the number of households below $10,000, those between $10,000 and $14,999, $15,000 to $24,999, $25,000 to $34,999, and $35,000 to $49,999. Divide the sum of households with less than $50,000 income by total households.
- *Percentage of All People whose income the previous 12 months is below the poverty level,* under Percentage under the Poverty Level.

From DP04 Selected Housing Characteristics:

- *Renter-occupied, percentage,* under Housing Tenure.

From DP05 Demographic and Housing Estimates

- *Total Population,* under Hispanic or Latino and Race
- *Hispanic or Latino, percent,* under Hispanic or Latino and Race
- *White alone, Not Hispanic or Latino, percent,* under Hispanic or Latino and Race

- *Black or African American alone, Not Hispanic or Latino, percent,* under Hispanic or Latino and Race
- *American Indian and Alaska Native alone, Not Hispanic or Latino, percent,* under Hispanic or Latino and Race
- *Asian alone, Not Hispanic or Latino, percent,* under Hispanic or Latino and Race
- *Native Hawaiian and Other Pacific Islander alone, Not Hispanic or Latino, percent,* under Hispanic or Latino and Race
- *Two or more races, Not Hispanic or Latino, percent,* under Hispanic or Latino and Race

Organizing Census Tract Data

Creating a Table you Can Present to the City Council

Create a spreadsheet where each of the indicators listed above is a row. Create a separate column for each census tract and the city (or county) as a whole. Create a column for "Total of Census Tracts with Payday Lenders" which will be the sum of the census tract columns. Create a column next to it called "Rest of [name]". This will be the total for the city less the total of census tracts with payday lenders.

For percentages you can use weighted subtraction to estimate the amount. For example:

$$\text{Rest \%} = \frac{\text{overall \%} - (\text{\% for total payday census tracts} * \text{population for payday census tracts} / \text{population overall})}{\text{population for rest} / \text{population overall}}$$

Later this spreadsheet can be pasted into word, like the one below.

In the table below you can see how these variables are used in the case of Daly City to compare census tracts with payday lending establishments to census tracts without payday lending establishments.

Figure 4: Comparison of Payday Lending Census Tracts and the Rest of Daly City

	Census Tracts with Payday Establishments				
	Census Tract 6007	Census Tract 6013	Total of Census Tracts with Payday Lenders	Rest of Daly City	Daly City, overall
Population	7,231	7,400	14,631	85,925	100,556
# of Payday Lenders	3	2	5	0	5
Family households with own children under 18 years	28%	38%	33%	30%	31%
Female household, no husband present, family	23%	13%	18%	14%	15%
Average household size	3.55	3.31	3.43	3.17	3.21
% Separated or divorced	9%	8%	9%	7%	8%
Bachelor's or Graduate degree	23%	23%	23%	35%	34%
Foreign born	62%	55%	58%	51%	52%
Percent Unemployment	9%	13%	11%	9%	9%
Median household income	$71,534	$47,434	$59,345	$78,133	$75,399
Household income less than $50,000	25%	52%	39%	29%	31%
Poverty rate, all people	5%	11%	8%	7%	8%
Renter occupied housing	40%	81%	61%	40%	43%

	Census Tracts with Payday Establishments		Total of Census Tracts with Payday Lenders	Rest of Daly City	Daly City, overall
	Census Tract 6007	Census Tract 6013			
Hispanic/Latino	36%	44%	40%	21%	24%
Not Hispanic					
White alone	7%	14%	11%	14%	14%
Black or African American alone	4%	3%	3%	3%	3%
Asian alone	49%	35%	42%	57%	55%
Two or more races	3%	1%	2%	3%	3%

Source, Insight Center, based on U.S. Census, American Community Survey, 5 year data, 2007-2011.

Ideally, you would not present all this data to a city or county council but rather pick the two to three most striking demographic comparisons to present.

Example of Demographic Analysis from above data:

Overall there are small differences for most of the variables when comparing the “Total of Census Tracts with Payday Lending” to “Rest of Daly City”. Those with the biggest difference are the percentage with Bachelor’s or Graduate Degree (23% to 35%, respectively), the Median household income ($59,345 to $78,133, respectively), Renter-occupied housing (40% to 21%), and Hispanic/Latino (40% to 21%, respectively). In Daly City it appears that payday lenders might be targeting neighborhoods with residents that are less educated, have lower median incomes, are renters, and are Hispanic or Latino. The income measure is interesting in that the poverty rate in the Payday Lending Census Tracts is 8% and about the same as the rest of Daly City, 7%. This may indicate that the payday lenders are targeting households where there are many residents above the poverty line but below the overall median household income.

One could argue that the demographics of these census tracts are due to their inclusion of commercial areas and that the payday lenders began operations there just because they were looking for any available commercial space. To test out this argument, one could select and analyze only those census tracts where there is commercial space in the census tracts. Any residential-only census tracts would be taken out of the comparison group, here called “Rest of Daly City”.

Gathering Testimonies from Payday Customers

Humanizing the 460% Interest Rate

Stories from payday customers can be very powerful at public hearings, at community meetings, or in a video. Gathering testimonies from payday borrowers can be one of the hardest parts of a campaign. It is best to reach out to organizations that are likely to serve and be in relationship with payday consumers, such as direct service agencies, credit counseling agencies, and faith-based congregations.

Many payday customers will be hesitant to speak, in some cases because they feel shame. It is important to emphasize that there is no shame getting a payday loan, rather it is a deceptive product that anyone could use without knowing its predatory nature, since the payday establishments do not advertise an APR. It is best to have the story of someone who has had multiple payday loans, which is the norm.

Here is an example of a customer testimony - http://www.calreinvest.org/news/abc-7-on-your-side-segment-exposes-wells-fargo-payday-product - although it is related to bank payday advances rather than payday loans the two are related and the video makes the debt trap point that is common to both.

Identify Key Background Research

Background research is especially useful for campaign organizers so that they understand the issue well. Background research can also be useful for coalition partners as well as elected officials. The research in this toolkit is divided into the following categories:

- Payday Lending, General
- Profile and Behavior of Payday Lending Borrowers
- Banks, Credit Cards, and Payday Lending
- Payday Lending Social Impacts
- Public Policy and Alternatives to Payday Lending
- The Economic Impact of Payday Lending

Payday Lending, General

Leslie Cook, Kyra Kazantzis, Melissa Morris, and James Zahradka, "Report on the Status of Payday Lending in California." Public Interest Law Firm of the Law Foundation of Silicon Valley. October 2009. http://www.siliconvalleycf.org/docs/payday-lending-report.pdf

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Review of California Law and Sample Ordinances from Around the State

California Law and State Preemption Concept

The State of California has usury laws and Deferred Transactions laws, which address and regulate the operation of payday lending establishments. California's doctrine of state preemption makes the state's laws superior to local laws. Local governments are permitted to make laws when they do not conflict with state law by duplicating, contradicting or covering topics already fully occupied by state law. A local ordinance can be rendered void if it conflicts with state law.

In light of the practice of state preemption, it is important for those wishing to regulate payday lending in California to understand what state laws govern the field of payday lending. The State of California currently has laws regarding interest rates and deferred transactions. The usury rate is capped at 10% by Article XV of the California Constitution, but this does not apply to deferred deposit (payday) lenders. Sections 23000-23106 of the California Financial Code, http://codes.lp.findlaw.com/cacode/FIN/1/d10/, also known as the California Deferred Deposit Transaction Law, govern the conduct of check cashers and payday lenders. The law requires payday lenders to register with the state, submit reports to the state and it allows the state to issue penalties to those that violate the law. Section 23036 limits the fee (interest) charged by the payday lender to 15% of the total transaction amount (loan plus fee). In addition, Section 1789 of the California Civil Code sets a limit on fees for check cashers. Local regulation would have to be respectful of these state laws in order to avoid state preemption issues.

County and cities may be able to gain control of their payday lending problem through zoning ordinances that restrict land use, rather than trying to regulate the business practices of payday lenders. As stated above, local land use is a police power granted to local governments rather than the state. However, the California Supreme Court's May 2013 ruling in the *City of Riverside v. Inland Empire Patient's Health and Wellness Center* case in favor of the City of Riverside might have favorable implications for the ability of local governments to broaden their regulation of payday establishments.

Here's a complete analysis of the issue of state preemption may be found here.

Review of Ordinances

A land-use ordinance is the way that local jurisdictions can have control over the location of new or relocating payday lending establishments. In many cases ordinances include all non-chartered financial institutions, that is, they include check cashing and car title loan establishments in addition to payday lending establishments. There is a high degree of overlap between these types of institutions. There are a number of options for a payday ordinance and many jurisdictions will combine the elements:

- **Moratorium**. Many jurisdictions will pass a one- or two-year moratorium on new or re-locating payday lenders while staff has an opportunity to study the issue.
- **Ban**. A ban is essentially a permanent moratorium on new or re-locating payday establishments. While it leaves intact existing payday establishments, it defines payday establishments as an unpermitted use for the any new establishment. Because a ban is a somewhat gray area as it relates to the California State Preemption Concept, it is not recommended in high visibility jurisdictions.
- **Ban from neighborhoods**. Similar to a jurisdiction-wide ban, a neighborhood ban disallows payday establishments from specific neighborhoods. Existing establishments are grandfathered

in. The ban may be neighborhoods where there are a high concentration of payday establishments, which is the case in San Francisco, or neighborhoods where there is a high concentration of low-income residents, which is the case in San Jose.

- **Cap**. A cap creates a maximum total number of payday establishments within the jurisdiction. It is usually set at the number of establishments at the time that the measure is passed. It is similar to a ban but it allows for a new payday establishment when an existing one closes, assuming it has met other provisions. San Jose's ordinance included a cap as well as distance provisions. A cap is especially useful for jurisdictions where there is a comparatively large number of existing payday establishments (compared on a per capita basis to other jurisdictions).
- **Distance measures.** Distance measures limit the location of new or re-locating payday establishments based on their distance from another specified land-use. These are perhaps the most common measure undertaken by local jurisdictions to limit payday establishments and due to familiarity with this type of ordinance local jurisdictions may be more likely to be receptive to it compared to other measures. There are usually two components to a distance measure:
    - **Distance from another payday lender.** This prohibits a payday lender from locating close to another one. This is done for two reasons. First, several payday establishments in close proximity to each other may begin to create a situation of blight, causing property values to fall and increasing crime rates. Second, it makes it harder for two establishments to send their customers back and forth to each other, trapping them in debt cycles. The most common distance between establishments is 1000 feet, while some jurisdictions use 1,320 feet (one-fourth mile). One California jurisdiction uses the more restrictive 2,640 feet (one-half mile).
    - **Distance from other sensitive uses.** Many jurisdictions limit payday lenders from being within 500 or 1000 feet of a number of potentially sensitive other uses, including chartered financial institutions, churches and religious institutions, schools, parks, community assemblies, recreational civic activities, liquor stores, and residential areas. Of these other uses the one that is most restrictive generally is to limit payday establishments from near residentially zoned areas.
- **Performance Measures or Operational Considerations.** Many jurisdictions require payday establishments to fulfill performance measures. Many of these are standard operating procedure for most payday establishments, such as hours of operation, signage, lighting, and graffiti abatement. But others, such as requiring security guards and a good neighborhood policy, are harder for a payday establishment to meet.
- **Conditional Use Permits**. Some jurisdictions take a one-step above minimum approach by requiring payday establishments to obtain a conditional use permit. While this does give local staff the opportunity to deny a payday establishment application, it does not provide local staff with policy guidance in making a decision about whether to grant the conditional use permit. Examples in California that have a conditional use permit include Rialto and Long Beach.
- **Zoning Code Verification Certificates**. This certificate verifies that an applying payday establishment has met all of the relevant zoning codes. While this certificate could be seen as a duplicative process it establishes one more check in the process, usually at the level of the Director of the Planning Department. A special operating permit or a special permit serve a similar function.

Example Language of Local Government Measures to Limit Payday Establishments

In most cases the table below provides link with the actual language of the local government ordinances. Here is sample language for the above types of measures.

Ban Example

Santa Clara County Ord. Code, § 2.10.040

> Banks. (Commercial) Financial institutions including federally chartered banks, savings associations, industrial loan companies, and credit unions providing retail banking services to individuals and businesses. This classification does not include payday lending businesses or check cashing businesses, and as a result, the establishment, expansion, or relocation of such businesses is prohibited. The term “payday lending business” as used herein means retail businesses owned or operated by a “licensee” as that term is defined in California Financial Code section 23001(d), as amended from time to time. The term “check cashing business” as used herein means a retail business owned or operated by a “check casher” as that term is defined in California Civil Code section 1789.31, as amended from time to time.

Ban from neighborhoods Example

San Francisco Planning Code Art. 2: 249.35

[After defining fringe financial services and defining six neighborhoods as “Fringe Financial Service Restricted Use Districts” (RUD), the Planning Code creates restrictions.]

(c) Restrictions.

(1) No new fringe financial services shall be permitted as a principal or accessory use in the Fringe Financial Service RUD.

(2) The controls of this Section 249.35 shall also apply within a ¼ mile of the Fringe Financial Service RUD.

(3) Outside of the Fringe Financial Service RUD and its ¼ mile buffer, fringe financial services shall be subject to the zoning controls set forth elsewhere in this Code, provided that, in addition, no new fringe financial service shall be permitted as a principal or accessory use within ¼ mile of an existing fringe financial service.

Cap Example

San Jose Municipal Code 20.80.1060 – Maximum number

> No more than a maximum of thirty-nine payday lending establishments shall be sited in the city.

Distance Measures Example

San Mateo County Zoning Regulations Sect. 6251 (f)8

8. Non-Chartered Financial Institutions, [use permit] subject to the following requirements:

   a. No Non-Chartered Financial Institution may be located within a radius of one thousand (1,000) feet from the nearest existing Non-Chartered Financial Institution.
   b. No Non-Chartered Financial Institution may be located within a radius of five hundred (500) feet from the following land uses:

(1) Residentially zoned parcels
(2) Any State or Federally chartered bank, savings association, credit union, or industrial loan company.
(3) Religious institution.
(4) School or Day Care Facility.
(5) Bar or Liquor Store, excluding full service restaurants and alcohol beverage sales establishments with twenty-five (25) or more full time equivalent (FTE) employees and a total floor area of twenty thousand (20,000) square feet or more.
(6) Pawn Shops.

Conditional Use Permits Example

Rialto City Ordinance 18.66.030

Establishes need for a conditional use permit for check cashing or payday loan establishment: http://www.rialtoca.gov/documents/downloads/CDP_Ordinance.pdf

Zoning Code Verification Certificates Example

San Jose Municipal Code 20.80.1050 – Certificate required

A. No person shall operate or suffer or allow the operation of a payday lending establishment until such time as a zoning code verification certificate has been duly applied for and issued by the director pursuant to the provisions of Chapter 20.100 of this title applicable to zoning code verification certificates, which zoning code verification certificate confirms full conformance of a proposed payday lending establishment with all of the applicable locational siting and licensing requirements of this title. The application for such zoning code verification certificate shall be filed pursuant to the requirements and processes set forth in Chapter 20.100 applicable to zoning code verification certificates.

B. A person intending to commence operation of a payday lending establishment at the same location occupied or previously occupied by a legally operating payday lending establishment may be issued a zoning code verification certificate without full conformance with the locational siting requirements of this title, so long as the prior payday lending establishment use has not been discontinued or abandoned for a period of six months or more.

Chronological Summary of California Jurisdictions Ordinances and Moratorium Related to Payday Lending

Jurisdiction	Type of Action	Date	Citation	Description	Feet from other Payday Lenders
Norwalk	Zoning Ord.	?	Mun. Ord. 17.04.095	**Cap and Distance**. Allowable only in zones C1, C3, and M1. Caps total establishments at 8. Note there are currently 9 payday lending establishments, latest (2007) approved apparently before the ordinance . http://www.qcode.us/codes/norwalk/	1,320
Oceanside	Zoning Ord.	2007	Resolution 07-R0621-1; LCPA -2-07 and ZA-4-07	**Distance**. Requires special operating permit, payday lenders classified as adult businesses. Not permitted within 500 feet of homes, church, park, or school. http://www.ci.oceanside.ca.us/civica/filebank/blobdload.asp?BlobID=26024	1,000
La Mirada	Zoning Ord.	2008	Mun. Ord. 21.45.010	**Distance**: Must be at least 500 feet from residential areas. Hours are limited to 7am-7pm. Restrictions on building. http://www.amlegal.com/nxt/gateway.dll/California/lamirada_ca/cityoflamiradacaliforniacodeofordinances?f=templates$fn=default.htm$3.0$vid=amlegal:lamirada_ca	1,000
Sacramento	Zoning Ord.	2008	City Code 17.24.050 (note 84)	**Distance:** Must be at least 1,000 feet from check cashers, financial institutions, church, or school. Must be at least 500 feet from a residential zone. Performance standards including hours. http://www.qcode.us/codes/sacramento/	1,000
San Francisco	Zoning Ord.	May 2008	Plng Code Art. 2: 249.35	**Prohibited in Certain Districts:** New or re-locating check cashers and payday lenders are prevented from locating with six special districts but may locate anywhere else in the city. Five of the six prohibited districts are alcohol restricted use districts – Mission, Divisadero, Third Street, Haight, and Excelsior, as well as North of Market Residential Special Use District. http://www.amlegal.com/library/ca/sfrancisco.shtml	No limit
Oakland	Zoning Ord.	June 2009	Plng Code 17.102. 430	**Distance**: Must be at least 500 feet from schools, chartered financial inst., community assemblies, churches, recreational civic activities, liquor stores http://library.municode.com/index.aspx?clientId=16490	1,000
Pacifica	Moratorium	Dec 2009		Two year moratorium from Dec 2009 to Dec 2011. Still studying ordinance.	No limit
Pico Rivera	Zoning Ord.	Dec 2009	Mun. Code 18.04.202, 18.40.040 (D26) 18.40.050C (72),	**Distance**. Also only permitted in zones C-M (Commercial – Manufacturing) and C-G (Commercial, General). http://qcode.us/codes/picorivera/	2,640

East Palo Alto	Zon-ing Ord.	? 2012	?	**? Distance**: Must be at least 500 feet from schools, chartered financial inst., community assemblies, churches, recreational civic activities, liquor stores	1,000?
National City	Zon-ing Ord.	Feb 2012	Mun. Ord. 18.30.330	**Cap**: Ordinance caps payday lenders at 12. Note there are currently 12 payday lending establishments including two that opened post-ordinance. Payday lenders must be located in shopping centers of at least 50,000 square feet. Ordinance followed a moratorium. http://library.municode.com/index.aspx?clientId=16516	No limit
Los Altos	Mora-tor-ium	2012	Mun. Code 14.02.070	**Permanent Moratorium**. Payday lending and check cashing establishments are prohibited from locating operating within the city.	No limit
Santa Clara County	Mora-tor-ium	May 2012	Ord. NS-1200.333	**Permanent Moratorium**. Payday lending and check cashing establishments are prohibited from locating operating within the unincorporated areas of the county. Follows a temporary moratorium passed in February 2012. http://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=0CDMQFjAA&url=http%3A%2F%2Fsccgov.iqm2.com%2FCitizens%2FFileOpen.aspx%3FType%3D4%26ID%3D89821&ei=UeOCUcrsFsiUiAK8yYHoBw&usg=AFQjCNH6_2J3GS0AzLh4wfYU0rET_2-WvA&sig2=45nuTTG2v7ftCd3xh0bKIw&bvm=bv.45960087,d.cGE&cad=rja	
San Jose	Zon-ing Ord.	June 2012	Mun. Code 20.70 (table 20-140) and 20.80.1050 - 20.80.1060	**Cap and Distance**. Caps number of establishments at current level (39). In addition to other establishments also cannot be located in or within 1,320 feet of a very low income census tract (as defined by HUD). New establishments must obtain a zoning code verification certificate, although if it moves into an existing payday site which has not been vacant for more than six months the distance requirements are waived. http://www.amlegal.com/library/ca/sanjose.shtml	1,320
San Mateo County	Zon-ing Ord.	June 2012	Zoning Reg. 6102.63.1, 6251 (f)8	**Distance and Performance Measures**. At least 500 feet from residential zoning, financial institution, religious institution, school or day care, bar or liquor store, or pawn shop. Performance measures include hours and security guard. http://www.co.sanmateo.ca.us/Attachments/planning/PDFs/Regulations/2012_ZoneRegs%5BFINAL%5D.pdf	1,000
Contra Costa County	Mora-tor-ium	Oct 2012		One year moratorium beginning Oct 2012 for new payday, car title, and short-term consumer finance lending businesses.	
Menlo Park	Mora-tor-ium	Oct 2012		Moratorium on new check cashing, car title loan, and payday lending establishments, extended in November 2012 for a total of two years.	
Gilroy	Mora-tor-ium	April 2013	Ord. 2013-06	Ten-month moratorium on payday lending establishments.	

Framing the Issue

Payday lending is fundamentally problematic because it creates a debt trap. The average borrower takes out eight to ten repeat loans just to pay off the first loan, each time paying the high interest rate – up to 460% APR in California - but receiving no new cash (each loan goes to pay off the previous loan). Whether a campaign has more emphasis on a focus of economic justice, economic impact, neighborhood blight, financial education, or alternative loan product, they are all rooted in an understanding of the debt trap nature of payday lending and the need to have longer term goals of rate caps or similar measures.

There are long-term and short-term strategies and frameworks for dealing with payday lending. Long-term strategies include setting a federal or statewide rate cap on interest or, for some, developing an alternative, non-predatory small-dollar loan product. In addition statewide strategies may include intermediate steps, such as lengthening the minimum term of the loan and limiting the number of loans that a borrower can take out over the course of a year. This toolkit is primarily focused on the more limited strategy of a local government ordinance to limit new payday lenders. This local strategy works best if it is coordinated with a broader statewide campaign since local elected leaders and local advocates can advocate with statewide elected officials to pass something at the state level.

Different frames are needed when speaking about payday lending. This depends on who the audience is – the city council, the business community, community residents, etc. Each campaign and each organization will need to find its own language that resonates with its audience and with the values and longer-term strategies of the organization.

The first decision to make with framing is whether the primary focus will be on payday lending itself, on payday as part of the larger issue of predatory lending, or payday lending as a component of financial education. To a large extent this will depend on the overall strategies of the organization (or organizations that make up a part of a coalition). In the case of a coalition it is possible that each organization will have its own way of framing the issue.

How to Make the Case Against Payday Lending

In speaking about payday lending there are a number of ways to frame the issue.

- The fundamental problematic nature of payday loans as debt traps - when less than ten percent of payday customers take out only one loan.
- An economic justice frame can speak about the targeting of low-income and immigrant communities and communities with a large population of people of color. This frame would also emphasize the repeat lending and debt trap of payday lending. One word of caution with this frame is that focus groups have shown that many payday customers do not like to be thought of as victims.
- An economic impact frame would speak of the economic cost to the neighborhood and the city due to the payday lending. The economic cost is due to households having less income from the high interest rates. A component of the economic cost frame is that many payday establishments are part of national chains based outside California, which makes the economic cost even greater.
- A neighborhood blight frame would speak about the ugly presence of some payday establishments and the research that has associated the presence of payday establishments with higher crime rates. https://webfiles.uci.edu/ckubrin/Payday%20Lending%20and%20Crime.pdf?uniq=fn1t8f

In speaking about predatory lending, one can place payday lending in the context of car title loans, bank paycheck advance loans, and credit card fees. This may be the most complex framing and may require multiple messages over time to communicate the message. This frame is best accomplished by an organization(s) that is dealing with all of the various forms of predatory lending.

If the organization(s) conducts ongoing financial education, it may wish to frame the payday lending issue as one of financial education. In this frame, organizations educate community residents about the pitfalls of payday loans. The financial education approach usually will utilize more than one of the frames spoken about above: it may speak about the economic justice of the issue, it may speak about all the various forms of predatory lending, and it may speak about the alternative lending options that are available. One difference with the other frames is that the financial education frame usually combines a message of personal responsibility with a frame of economic justice.

With any of the frames it may be helpful to speak about alternatives to payday loans. Underlying this concept is the idea that people need access to quick, short-term, small-dollar loans. While there is not one satisfactory alternative to payday lending, there are a number of possible alternatives. One of the most common alternatives is the various small-dollar loan options offered by credit unions. In some areas, alternative lending guides have been elaborated (see the Resources section).

Coalition Building for Payday Lending

Building the Coalition Necessary to Limit Payday Lending

Coalitions bring together diverse groups each with their own constituency, approach, skills, and connections. A coalition can be key in the success of a strategy or Action Plan. One purpose of a coalition is to have a broad cross-section speak to the city council about payday lending at the time of a hearing.

Evaluate if it is Necessary

In many smaller jurisdictions forming a coalition is not necessary. In some cases there may be a lack of potential partners so it might not be possible. The city or county council of a smaller jurisdiction may be agreeable to the proposal without the need for a large coalition building effort. In a larger city, like San Jose, a coalition is usually necessary.

Types of Coalition Partners

There are many types of coalition partners:

- National advocacy organizations. The Center for Responsible Lending is a potential partner for a local campaign to limit payday lending anywhere in the country. Other national and regional partners could include the Consumer Federation of America and the Southwest Center for Economic Integrity.
- Statewide advocacy organizations. Statewide coalitions against predatory lending and for fair lending are important partners in local payday lending campaigns, such as the California Reinvestment Coalition.
- Legal centers or legal services. Because of the need to understand the various policy options and the language of a proposed ordinance, legal centers or legal services are one of the most common coalition partners. Examples: Law Foundation of Silicon Valley, Community Legal Services in East Palo Alto.
- Advocacy organizations. Advocacy organizations are able to mobilize people to call for action on payday lending and often can connect people and other groups to related advocacy efforts. Example: Alliance of Californians for Community Empowerment.
- Groups representing diverse populations. These populations include foreign language speakers, immigrants, women, seniors, military/veterans, etc. These organizations can help a coalition reach many different parts of the community. Example: Nuestra Casa (East Palo Alto).
- Strategic sectors of the community including youth, labor, and faith groups. For example, youth see the impact of payday lending in their families and communities and can be a powerful voice with elected officials. Example: Youth Leadership Institute.
- Social service organizations. Social service organizations are in touch with a broad cross-section of the low- and low-to-moderate-income population and will usually have many clients who are payday lending customers. They can help connect payday lending to issues of economic security. Example: Pacifica Resource Center.
- Organizations that conduct financial education. These organizations can help link community education efforts with payday lending advocacy. Example: Catholic Charities of Santa Clara County.
- Business community or chamber of commerce. These partners can help reach influential parts of the community and help counter-act the lobbying efforts of the payday industry. Example: President of the Pacifica Chamber of Commerce.

After identifying potential allies and supporters, it's important to reach out. Set up a meeting to discuss the issue, the goals of the campaign, and what you are asking of them. It is best to have identified beforehand a concrete ask of them and how you would like them to participate, such as an "endorsement", writing a letter, visit a city council person, helps find payday consumers willing to speak, etc.

Keep in mind that after a local campaign to limit payday lending, it will be valuable to mobilize the same coalition in efforts to pass a statewide rate cap or similar measure or, potentially, a federal rate cap. A local coalition should be built with the long-term strategy in mind.

Creating a Campaign Action Plan

It is highly suggested that the group or groups coming together to work on a payday lending advocacy campaign begin by developing an Action Plan. This can be done in one extended planning meeting or over the course of several meetings in consultation with key stakeholders, such as sympathetic local elected officials. There are at least seven potential components to the Action Plan, but feel free to add your own:

1. Develop an Overall Strategy or Course of Action
2. Identify Why Payday Lending is a Problem or an Issue
3. Identify Challenges to a Successful Advocacy Campaign
4. Identify allies
5. Identify (potential) opposition
6. Develop a time line with key project activities
7. Identify resources

This toolkit is primarily focused on the more limited strategy of a local government ordinance to limit new payday lenders. This local strategy works best if it is coordinated with a broader statewide campaign since local elected leaders and local advocates can advocate with statewide elected officials to pass a rate cap or something similar at the state level.

Develop an Overall Strategy or Course of Action

The group or groups should decide on a preferred course of action, such as whether to use a moratorium, a zoning ordinance, a payday alternative loan program, consumer financial education, or all of the above. For a moratorium or zoning ordinance, the group should decide if it will have an insider or outsider strategy, or both. If the group has a champion or promoter on the city council that will move the process forward, it can employ an insider strategy, which is almost always the preferred strategy. Many groups choose to have an insider-outsider strategy, that is they will have a champion on the council but also will gain the community's support for the initiative. This was the case in East Palo Alto where there was a sympathetic mayor but also many community members and leaders spoke up at the city council hearing, through the work of Nuestra Casa and Community Legal Services in East Palo Alto (CLS). This was also the case in San Jose where there was a city council champion whose chief of staff spent a lot of time and resources on the ordinance. At the same time the Coalition Against Payday Predators (CAPP) did a lot of organizing of community-based organizations and community members.

An outsider strategy will need to have a specific way of bringing attention of the issue to the council or pressuring the council. For example, the San Jose CAPP used an endorsement campaign, where they sought the endorsements of community leaders of all types. In a somewhat similar way, Nuestra Casa is seeking petitions from community members and leaders in Redwood City.

Any local government ordinance requires time to research city council. The purpose of this research is:

- identify a champion(s) for the campaign (unless it is an outsider strategy)
- begin to understand where council members might stand on the issue
- identify people and organizations who have influence over key council members

This research is done by talking to other elected officials, talking with key community stakeholders who have dealt with the city council, reading news reports regarding other similar issues that the city council has dealt with, and sitting in on city council meetings to observe and hear the council members.

The Action Plan may discuss approaches to take with the City Council or other relevant decision making body and city staff. The Action Plan may specify preferred components of the strategy, such as specific language of a zoning ordinance. For example: "to pass an ordinance which would require payday lending establishments to be at least 1000 feet from another payday establishment, school, or liquor store." The Action Plan may also have back-up strategies which can be used in the course of discussing options with the City or elected officials.

Identify Why Payday Lending is a Problem or an Issue

The purpose of this point in the Action Plan is to determine what will motivate elected officials and/or the general public to support the payday lending proposed action. To identify why it is an issue requires a combination of being familiar with the literature in order to inform discussions about the problem and listening to the concerns of elected officials or the public. This step requires some type of consultation process – either a community survey, interviews, conversations with elected officials, or including elected officials in the planning process.

Examples of statements on why payday lending is a problem:

- The payday lenders trap members of the community in a debt cycle, which causes more problems for those community members as well as the community as a whole.
- The number of payday lenders is almost equal to the number of bank branches. We don't want to be seen as a payday lending city.
- High interest payments drain the money of payday customers and drain money out of the city to the corporate offices of the payday lenders.

Identify Challenges to a Successful Advocacy Campaign

Identifying challenges before they happen allows a group to create strategies to overcome those challenges in order to reach the overall goal. Challenges can be internal or external. Internal challenges can be lack of experience working on the issue or limited capacity or funding. External challenges can include lack of potential campaign partners, strong payday lobbying presence, or elected officials diverted by other issues. Other examples could include an upcoming election with an unknown impact on the campaign or the reaction of the local Chamber of Commerce.

Identify allies

Allies are people or organizations that will support the campaign in an active fashion – by doing or saying something that will contribute to the goals of the campaign. Allies can include elected officials, community leaders, service organizations, faith-based organizations, the business community, youth, and schools. The strength of one's allies will often be a major factor in determining what type of campaign to carry out. In identifying allies, the Action Plan should also identify who will be seeking the support of the various potential allies.

Identify (potential) opposition

Opposition are people or organizations that will oppose the campaign, either by voting against it, if an elected official, speaking at a public hearing, or counter-organizing. In some cases the only opposition will come from the payday lending industry itself, either local owners of establishments or lobbyists of the industry. At least three of the larger payday chains have lobbyists in Sacramento that will often travel to public hearings and may be talking with elected officials and city staff before voting takes place. Opposition could also come from elected officials, banks, or other community members. An elected leader who may disapprove of the campaign or the strategy, but not the broader objective, might not be considered opposition.

Develop a time line with key project activities

The time and the list of activities will usually be the lengthiest portion of the Action Plan. Decide when you would like to have the goals completed. If this depends on a vote by elected officials it may be impossible to predict when that body will schedule the vote so the Action Plan needs to have some flexibility.

The list of project activities may be divided into headings which will each have its section on the time-line. Examples of this might be: Community Support, Media Work, Preparation of Materials/Video, Outreach and Coalition Building, and Relationship Building with Elected Officials.

The timeline should be divided by months or two months, or the desired time length. Examples of project activities could include:

- Prioritize groups to become part of a campaign coalition
- Meet with groups to become part of campaign coalition
- Meet with possible opposition groups to convince them to be neutral or to join the coalition.
- Identify individuals who use or have used payday lenders and are willing to tell their story
- Identify relevant research to support the campaign goals
- Meet with City attorney or City planning staff
- Line up people to speak at an upcoming city hearing on payday lending
- Plan a community forum on payday lending

Identify resources

Identify all of the resources necessary to ensure that the overall strategy is successful. The resources should be comparable to the level of financial support committed as well as the capacity of the campaign members. Here are some possible items that could be included in a resource list:

- Staffing level, listed by the various roles or tasks that each person would be carrying out
- List of materials, including fliers, videos, texting, by audience and language. Estimate the cost of producing the materials
- Advertising for community outreach events
- Consultant for media work – preparing speakers, messaging and developing talking points, helping with media outreach

For an example of a general guide to develop a strategy and create a campaign action plan, see the Midwest Academy GROW chart: http://www.tcsg.org/sfelp/toolkit/MidwestAcademy_01.pdf.

Resources for Payday Advocacy

Videos

"Get Paid, Not Played," Peninsula Advocates Investigating Debt-Traps, Daly City BOOF, Youth Leadership Institute: http://www.youtube.com/watch?v=jaTqkYhkXAQ , 3:42

U-Pay-Us – The Payday Lending Show, by Nuestra Casa and Community Legal Services in East Palo Alto. http://www.youtube.com/watch?v=0lnXz14Uoi4, 7:23

"U-PAY-US" (Spanish): El Programa de Préstamos Sobre Sueldo" East Palo Alto. http://www.youtube.com/watch?v=5wAcw5ZMnbw, 9:37

Wells Fargo payday advance customer on a Sacramento news broadcast. http://www.calreinvest.org/news/abc-7-on-your-side-segment-exposes-wells-fargo-payday-product

Organizing Tools

California Reinvestment Coalition (CRC) payday lending brochure: http://www.insightcced.org/uploads/assets/payday%20brochure.pdf

CRC payday brochure in Spanish (folleto de préstamo sobre sueldo): http://www.insightcced.org/uploads/assets/Payday%20brochure%20Spanish%20-%20CRC.pdf

Powerpoint slides (4), Coalition Against Payday Predators (CAPP). (Community education slides): http://www.insightcced.org/uploads/assets/Payday%20Lending%20Slides%20-%20CAPP.pptx

Talking Points for the Instructor or Discussion Guide, to accompany the powerpoint slides, above, CAPP, http://www.insightcced.org/uploads/assets/Payday%20Lending%20Curriculum%20Talking%20Points%20-%20CAPP.docx

"Controlling the Growth of Payday Lending Through Local Ordinances and Resolutions: A Guide for Advocacy Groups and Government Officials," by Kelly Griffith, Linda Hilton, and Lynn Drysdale, updated 2012: http://www.consumerfed.org/pdfs/Resources.PDL.LocalOrdinanceManual11.13.12.pdf .

Payday Lending Zoning Laws, U.S., by Kelly Griffith, Linda Hilton, and Lynn Drysdale, updated Jan. 2013, http://www.insightcced.org/uploads/assets/PAYDAY%20LENDING%20ZONING%20LAWS%20chart%C2%A01-13.doc

PayDay Loan Consumer Information, Consumer Federation of America, http://paydayloaninfo.org/ .

Research

Center for Responsible Lending research, analysis and briefs on payday lending: http://www.responsiblelending.org/payday-lending/research-analysis/

See research list in this toolkit.

Alternatives

Office of San Mateo County Supervisor Rose Jacobs Gibson, "The High Cost of Payday Loans: A Guide to Understanding Payday Loans & Information on Finding Alternatives". http://www.co.sanmateo.ca.us/Attachments/bos/pdfs/District%204/Current%20Projects/HighCostofPaydayLoans_English.pdf. (Geared to the consumer.)

San Francisco's Payday Plus: http://paydayplussf.org/