



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

PUBLIC DISCLOSURE

April 18, 2011

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Broadway National Bank
Charter Number: 14447

1177 N.E. Loop 410
San Antonio, TX 78217

Office of the Comptroller of the Currency
Southern District
San Antonio – North Field Office
10001 Reunion Place, Suite 250
San Antonio, Texas 78216

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with the safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall Community Reinvestment Act Rating

Institution’s Community Reinvestment Act Rating: This institution is rated “**Satisfactory.**”

The following table indicates the performance level of **Broadway National Bank (BNB)** with respect to the Lending, Investment, and Service Tests:

| Performance Levels | Broadway National Bank Performance Tests | | |
|---------------------------|---|-----------------|--------------|
| | Lending Test* | Investment Test | Service Test |
| Outstanding | | X | |
| High Satisfactory | | | X |
| Low Satisfactory | X | | |
| Needs to Improve | | | |
| Substantial Noncompliance | | | |

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- Overall lending activity reflects satisfactory responsiveness to credit needs in the bank’s assessment areas (AAs), given the bank’s business strategy and performance context.
- A substantial majority (87%) of the number of Home Mortgage Disclosure Act (HMDA) and small business/small farm loans, originated by BNB during the evaluation period, were within its AAs.
- The overall geographic distribution of small loans to businesses is excellent. The overall distribution of Home Mortgage Loans by income level of the geographies and among borrowers of different income levels is substantially below average in the San Antonio Metropolitan Area (MA).
- Community development lending had a positive impact on the Lending Test performance.
- The level of community development investments is excellent, based on the quantity and quality of the investments.
- The accessibility of BNB’s offices to geographies and individuals of different income levels and the responsiveness of BNB’s services to the needs of its AAs are low satisfactory.
- The bank’s level of community development services is excellent.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this Performance Evaluation (PE) including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/AA.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. CT boundaries do not cross county lines; however, they may cross the boundaries of MAs. CTs usually have between 2,500 and 8,000 persons, and their physical size varies widely depending on population density. CTs are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income (LMI) individuals; community services targeted to LMI individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize LMI geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System (Fed), the Office of the Comptroller of the Currency (OCC), and the Federal Deposit Insurance Corporation (FDIC) have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize:

1. LMI income geographies;
2. Designated disaster areas; or
3. Distressed or underserved nonmetropolitan middle-income geographies designated by the Fed, FDIC, and OCC, based on:
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of LMI individuals.

Community Reinvestment Act (CRA): The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male householder and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A CT delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area (MSA) to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn). Beginning in 2004, the reports also include additional data on loan pricing, the lien status of the collateral, any requests for pre-approval and loans for manufactured housing.

Home Mortgage Loans: Such loans include home purchase, home improvement and refinancings, as defined in the HMDA regulation. These include loans for multifamily (five or more families) dwellings, manufactured housing, and one-to-four family dwellings other than manufactured housing.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100% tabulations, the count of households always equals the count of occupied housing units.

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50% of the area median income, or a median family income (MFI) that is less than 50%, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/AA.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development (HUD) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below.

Metropolitan Area (MA): Any MSA or metropolitan division, as defined by the Office of Management and Budget (OMB) and any other area designated as such by the appropriate federal financial supervisory agency.

Metropolitan Division: As defined by the OMB, a county or group of counties within an MSA that contains a population of at least 2.5 million. A Metropolitan Division consists of one or more counties that represent an employment center or centers, plus adjacent counties associated with the main county or counties through commuting ties.

Metropolitan Statistical Area (MSA): An area, defined by the OMB, as having at least one urbanized area that has a population of at least 50,000. The MSA comprises the central county or counties, plus adjacent outlying counties having a high degree of social and economic integration with the central county as measured through commuting.

Middle-Income: Individual income that is at least 80% and less than 120% of the area median income or an MFI that is at least 80% and less than 120% in the case of a geography.

Moderate-Income: Individual income that is at least 50% and less than 80% of the area median income, or an MFI that is at least 50% and less than 80%, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state MA. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state MA, the institution will receive a rating for the multi-state MA.

Small Loan(s) to Business(es): A loan included in 'Loans to Small Businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

Small Loan(s) to Farm(s): A loan included in 'Loans to Small Farms' as defined in the instructions for preparation of the Call Report. These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier 1 Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is at least 120% of the area median income, or an MFI that is at least 120 percent, in the case of a geography.

Description of Institution

Broadway National Bank (BNB) was established in 1941 to primarily serve the deposit and credit needs of military families stationed in San Antonio, Texas. BNB started as a small, suburban neighborhood bank. It has grown into the largest independent, locally owned bank headquartered in San Antonio. As of December 31, 2010, BNB reported total assets of \$2.3 billion and net income of \$31 million.

BNB is an intra-state bank that is wholly owned by Broadway Bancshares of Delaware, Inc., (BBDI), an intermediary multi-bank holding company, which is wholly owned by Broadway Bancshares, Inc. (BBI), a Texas-based bank holding company. BBI's total assets as of December 31, 2010, were \$2.4 billion. There are no activities of any affiliates or subsidiaries of BNB that were reviewed in this Performance Evaluation (PE).

In 1973, BBI separately chartered the Eisenhower National Bank (ENB) to serve U.S. military clientele on Fort Sam Houston in San Antonio and at other military facilities in Texas and the Southwest U.S. In 2004, ENB merged into BNB. All former ENB locations continue to operate as a distinct division of BNB and maintain the ENB primary strategy of meeting the banking needs of U.S. military personnel throughout the world. Many customers of the former ENB are stationed at military installations throughout the world and use online, telephone, and mobile banking services. BNB's performance in and around those geographies, primarily reflects the former ENB's military banking strategy. As of November 2010, the name for ENB locations was changed to Broadway Bank.

BNB faces strong competition in the San Antonio area from multi-national and regional companies that have a significant presence in the San Antonio area. These include: Frost National Bank; International Bank of Commerce; Compass Bank; Bank of America, NA; Wachovia Bank, NA; Wells Fargo Bank, NA; and JPMorgan Chase Bank, NA. Additional competition comes from the area's large number of community banks, credit unions, national and regional mortgage companies, federal savings banks, and finance companies. Credit unions are especially competitive in consumer deposits, auto lending, and home mortgage lending.

As of December 2010, BNB's market share of bank deposits was 7.49% for a ranking of fourth in its combined AAs. As of December 31, 2010, net loans represented 56% of total assets.

BNB offers a full range of financial and credit services, with an emphasis on business and real estate lending. These include commercial, real estate, and consumer loan products. BNB's previous CRA PE is dated March 17, 2008, and was rated "Satisfactory" under Large Bank CRA guidelines. No legal impediments or other factors hinder the bank's ability to provide credit in its AA.

Please refer to Appendix B for a market profile for the San Antonio MA that received a full-scope review. This section contains detailed demographics, descriptions of the institution's operations, and other performance context information for the San Antonio MA AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This PE assesses BNB's performance under the Lending, Investment, and Service Tests. To evaluate the bank's lending performance, we reviewed residential mortgage loans subject to HMDA, small loans to businesses and farms subject to filing under CRA and community development loans. The Investment Test included a review of investments and donations made in the bank's AAs that meet the definition of community development investments. The Service Test included a review of retail and community development services provided in the bank's AAs.

The evaluation period for the Lending Test includes HMDA and CRA reported loans for the years of 2008, 2009 and 2010, beginning January 1, 2008 and ending December 31, 2010. The evaluation period for community development loans, qualified investments and services is March 18, 2008, which is the day after the last CRA evaluation, through April 18, 2011, the date of this evaluation.

Data Integrity

In January 2011, prior to this evaluation, OCC personnel verified the accuracy of data made available to the public in accordance with HMDA and CRA loan data reporting requirements. Marquis Software Solutions manages the bank's HMDA and CRA data. This information is reported to Marquis quarterly for review and reviewed again before annual submission. We also reviewed the internal audit reports for data integrity. The audit covers 160 loans per year and adequately tests for HMDA and CRA data integrity.

There were no errors identified by internal audit with regard to HMDA and CRA data integrity. We pulled a small sample during the full-scope examination to confirm these results as time permitted. We found no errors with the key fields during our review.

Selection of Areas for Full-Scope Review

We selected the San Antonio MA as the only full-scope area, as it is where a substantial majority of BNB's business is located. During the evaluation period, 87% of the bank's reported loan activity and 77% of the bank's branches are located in the San Antonio MA. We conducted a limited-scope review in the remaining AAs.

Ratings

We base our ratings primarily on the area(s) that received a full-scope review. As a result, performance in the San Antonio MA received the most weight in the overall analysis. Lending performance in small business loans received the most weight in determining the Lending Test rating, followed to a lesser extent by residential home purchase and residential home improvement performance. Home mortgage refinances, multi-family and small farm loans received the least amount of weight as they represent smaller percentages of BNB's lending activity.

Other

For this examination, we reviewed summaries of interviews with individuals from community groups conducted during the evaluation period. Two of the contacts were from Bexar County Economic Development Corporation and Alamo Workforce Solutions. The individuals indicated primary area needs of affordable home financing, small business financing, and economic development. Their comments were positive and reflected that financial institutions in the San Antonio MA are meeting community credit needs.

Fair Lending or Other Illegal Credit Practices Review

We found no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Lending Test is rated "Low Satisfactory."

These conclusions are based on the bank's performance context and full-scope review of the San Antonio MA. Small business lending is BNB's primary product for evaluating CRA performance and had the most impact on the final rating. Other factors that had a positive impact on the rating were the significant majority of loans originated within the combined AAs and the bank's level of community development lending.

Lending Activity

BNB's responsiveness to credit needs in its AAs during the evaluation period is satisfactory. Identified credit needs include loans to small businesses and affordable housing. In the AA, small loans to businesses comprised 78% of HMDA and CRA reportable loans and 21% were home mortgage loans. Community development lending was good, particularly those benefiting small businesses and LMI borrowers, and totaled 12% of HMDA and CRA reportable loans. Community development had a positive effect on Lending Test conclusions.

During the evaluation period, the quarterly net loan-to-deposit ratio fluctuated between a high of 66% to a low of 55%, showing an increasing trend since the last PE. The ratio averaged 60% over the evaluation period. The ratio as of December 31, 2010, of 55% is lower than the peer average of 84%.

We selected the primary loan product, small loans to businesses, for assessing CRA performance. Small loans to businesses represent 81% of the number and 79% of the dollar amount of loans originated within the AA. Small farm loans represented only 1% of the number and 1% of the dollar amount of loans originated within the AA, and are not a primary business line.

We also selected home mortgage products for assessing CRA performance. These products combined represent 18% of the number and 19% of the dollar amount of total reported loan originations in the AA. Of total home mortgage products, home purchase loans represent 31%, home improvement loans represent 36%, and home refinance loans represent 32%. The bank made 4 reported multi-family loans.

In the San Antonio MA AA, BNB ranked seventh in deposit market share as of June 30, 2010 (2.3%). Based on HMDA data from the evaluation period, BNB had a 0.15% overall market share in home purchase loans, a 1.59% market share in home improvement loans, and a 1.83% market share of small loans to businesses. BNB's market share of home mortgage loans and small loans to businesses is less than its deposit market share.

Distribution of Loans by Income Level of the Geography

Home Mortgage Loans

Refer to Tables 2, 3, 4 and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

BNB's distribution of home mortgage loans by geography is substantially below average for the San Antonio AA.

The geographic distribution of home purchase loans is below average. The distribution of loans in the moderate-income geographies is lower than the percentage of owner-occupied housing units. The bank has no loans in low-income geographies; however, the percentage of owner-occupied housing units in low-income CTs is very low at less than 2%. BNB's market share in moderate-income geographies is lower than the overall market share.

The geographic distribution of home improvement loans is below average. The distribution of loans in moderate-income geographies is lower than the percentage of owner-occupied housing units. The distribution of loans in low-income geographies is lower than the percentage of owner-occupied housing units. The bank's market share in LMI geographies is somewhat lower than the overall market share.

The geographic distribution of home refinance loans is below average. The distribution of loans in LMI geographies is lower than the percentage of owner-occupied housing units in those respective CTs. BNB's market share in moderate-income geographies exceeds the overall market share and market share in low-income geographies is less than overall market share.

The geographic distribution of multi-family loans is below average. The distribution of loans in LMI geographies is lower than the percentage of owner-occupied housing units in those respective CTs. BNB's market share in LMI geographies for multi-family loans is far less than the overall market share.

Small Loans to Businesses

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The geographic distribution of small loans to businesses is excellent. The distribution of loans in low-income geographies exceeds the percentage of small businesses located in low-income geographies. The percentage of loans in moderate-income geographies is slightly lower than the percentage of small businesses located in moderate-income geographies. The bank's market share in low-income geographies far exceeds the overall market share. The bank's market share in moderate income geographies is slightly less than the overall market share.

Small Loans to Farms [if applicable]

Refer to Table 7 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

Small farm loans are not a primary loan product and therefore are not included in the analysis of lending performance. The table is provided for informational purposes only.

Lending Gap Analysis

We reviewed maps, reports and analysis detailing BNB's lending activity over the evaluation period for home mortgage and small loans to businesses to identify gaps in the geographic distribution of those loans. We did not identify any unexplained gaps.

Inside/Outside Ratio

A majority of the HMDA, small business, and small farm loans originated by BNB during the evaluation period were within its AAs. BNB originated 91% of the total number of loans and 86% of the total dollar volume of loans within the combined AA. Small business loans within the AAs represent 93% by number and 91% by dollar amount of all small business loan originations during the evaluation period. Mortgage loans within the combined AAs represent 83% by number and 72% by dollar amount of all mortgage loan originations during the evaluation period.

Distribution of Loans by Income Level of the Borrower

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

BNB's distribution of home mortgage loans by income level of borrowers is below average for the San Antonio MA. The HUD adjusted average median family income (MFI) for 2010 was \$57,800 and the average median housing value was over \$84 thousand. Absent of subsidized housing situations, an LMI individual may not have the financial means to purchase the average single-family residence. In addition, the percentage of households below the poverty level remains elevated at 14%.

The distribution of home purchase loans by borrower income level is less than adequate. The bank made no purchase loans to low-income designated individuals and the percentage of loans to moderate-income individuals is less than the percentage of moderate-income individuals in the AA. BNB's market share to LMI borrowers is below the overall market share.

The distribution of home improvement loans by borrower income level is below average. The percentage of loans to low-income individuals is lower than the percentage of low-income families in the AA. The percentage of loans to moderate-income individuals is near the percentage of moderate-income families in the AA. The bank's market share to LMI borrowers is near the overall market share.

The distribution of home refinance loans by borrower income level is below average. The percentage of loans to LMI individuals is less than the percentage of LMI individuals in the AA. The bank's market share to low-income borrowers exceeds the overall market share and the market share to moderate-income borrowers is near the overall market share.

Small Loans to Businesses

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The overall distribution of loans to businesses with annual revenues of \$1 million or less is below average. BNB's percentage of small loans to businesses with annual revenues of \$1 million or less is substantially lower than the percentage of businesses with annual revenues of \$1 million or less in the AA. The bank's market share to businesses with annual revenues of \$1 million or less does exceed the overall market share.

Small Loans to Farms [if applicable]

Refer to Table 12 in the Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

Because these loans are not a primary loan product line of the bank, we did not conduct an analysis. The table is included for informational purposes only.

Community Development Lending

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all community development loans, including multi-family loans that also qualify as community development loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as community development loans. Table 5 does not separately list community development loans, however.

BNB's community development lending had a positive impact on the Lending Test conclusions in the San Antonio AA. BNB made 66 community development loans totaling almost \$54 million in the San Antonio AA during the evaluation period. This volume is favorable as these loans were highly responsive to the prominent credit need of affordable housing and community services.

The following highlights some of BNB's community development lending activity:

Affordable Housing:

Broadway Bank originated 36 Interim Construction loans for \$4.5 million to help the following Affordable Housing Builders:

- Jaigon Enterprises, Inc. recently participated in the City of San Antonio's 2010 Affordable Showcase of Homes called "Tierra del Sol." The purpose of these efforts is to continue to revitalize inner city neighborhoods by providing high-quality affordable homes for first-time homebuyers. These projects also increase the taxable value of underutilized or vacant property and are aimed to stabilize neighborhoods that have not seen many new housing opportunities. This is a brand new subdivision located in the west side community, Edgewood Independent School District (ISD), one of the lowest income areas of San Antonio.

- Rivercity Properties focuses on rehabbing foreclosed homes in LMI areas and selling these affordable homes to low-income families in the San Antonio community.
- Guess Homes, LLC builds affordable homes in LMI areas of San Antonio. These homes are located in the Mission del Lago subdivision located in the south side community.
- HRCH, Inc. d/b/a Rio Custom Homes builds homes in LMI areas of San Antonio. They built in the Ashley Heights subdivision located in the south side community.

Community Development Services

- Comal County Senior Citizens Foundation offers various programs including minor home repair and Meals on Wheels, giving senior citizens opportunities to maintain independent living. BNB originated a loan in the amount of \$16,823 to purchase a 2008 Ford Van.
- George Gervin Youth Center Inc. is a 501(c)(3) non-profit organization that provides vocational training, remedial education, mentoring, tutoring, job placement, and supportive services for over 1,400 of San Antonio's at-risk and disadvantaged youth. BNB increased their existing line of credit in the amount of \$150,000.
- Baptist Child and Family Services is a San Antonio-based agency of the Baptist General Convention of Texas. This human services organization has locations and programs offering residential services for emotionally disturbed children and assisted living for special needs adults. The purposes of the loans are for working capital on various programs and acquire an office building. BNB originated 10 loans totaling \$15.1 million.
- Crosspoint, Inc. provides a structured residential environment for individuals referred by the Federal Bureau of Prisons, the U.S. Probation Office, or U.S. Pretrial Services. Measures of program progress include obtaining employment, creating a realistic budget, improving family and community support systems, remaining drug and alcohol-free, and developing a stable residential plan. BNB originated a loan in the amount of \$2.5 million to purchase a building to combine their corporate offices and treatment center.
- Methodist Healthcare Ministries of South Texas Inc. is a faith-based, non-profit organization that was created to provide care through health-related programs and services that it owns and operates. These include primary care medical and dental clinics, support services like counseling, case management and social services, parenting programs, community centers and church-based community nursing programs benefiting low-income families. MHM owns and operates three primary care clinics that address the medical, dental and social service needs of people who cannot afford health insurance. The Wesley Primary Care Clinic Columbia Heights serves the residents of south San Antonio with full-service medical and dental clinics and social/counseling services. The Bishop Ernest T. Dixon Jr. Clinic provides medical and counseling services to the residents of San Antonio's east side community.

Economic Development:

- Accion Texas, Inc. helps micro entrepreneurs strengthen their businesses, stabilize and increase their incomes, create additional employment and contribute to the economic revitalization of their communities. BNB originated two loans totaling \$325,000 to renew loans to fund micro loans. In addition, BNB and Accion have started a formal referral

program for Small Business loans. Any application that is being submitted to Bank 2 Business (B2B) will be eligible for this program. If an application is declined by B2B, it will be reviewed against Accion's loan guidelines.

Product Innovation and Flexibility

BNB has initiated several flexible loan programs to address the credit needs of small business owners as well as LMI individuals and geographies. These programs provide credit opportunities for businesses that may not qualify under traditional underwriting standards.

BNB is a Preferred Lender with the Small Business Association (SBA) and participates in the SBA's Small Loan Program designed for loans under \$50,000 and for SBA loans, which guarantees a certain percentage of the total loan amount up to a maximum of \$750,000. SBA Programs include:

- SBA Patriot Express Loans is a pilot initiative that integrates all of SBA's programs and services to veterans and members of the military community. The SBA has taken steps to broaden the availability to veterans of financial assistance and business counseling. Patriot Express loans may go up to \$500,000 and qualify for the SBA's maximum guaranty of up to 85% for loans of \$150,000 or less, and up to 75% for loans over \$150,000 up to \$500,000.
- Small Business Lending - SBA 504 Loan Program offers businesses the opportunity to secure long-term financing for commercial real estate (CRE) projects including purchase, construction or renovation. These funds can be used for projects that encompass direct acquisition or acquisition of land to build, as well as for the purchase of equipment.
- Small Business Lending - SBA 7(a) and Low Doc Loans offers BNB's traditional SBA 7(a) and Low Doc Loans which are designed for small business owners who need funds for working capital, equipment purchases, debt refinancing and small CRE purchases. Under the SBA 7(a) program, BNB provides loans up to \$1 million. For the Low Doc Loan program, the bank can provide loans up to \$150 thousand.

BNB originated SBA 72 loans totaling \$17.1 million during the review period. This includes 17 Patriot Express Loans with balances totaling \$2,637,708.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, BNB's performance under the Lending Test in the San Antonio MA, Killeen-Temple-Fort Hood MSA, Austin-Round Rock MSA, Kerr County MSA, and Gillespie County AA is consistent with the bank's overall high satisfactory performance under the Lending Test. Refer to Tables 1 through 13 in Appendix C for facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

BNB's performance under the Investment Test is "Outstanding." Based on a full-scope review, the bank's performance in the San Antonio MA is excellent.

The overall level of qualified investments is high when compared to the size of the bank. During the evaluation period, BNB invested in qualified investments and donations totaling \$147.2 million, inclusive of prior period qualified investments still outstanding. This represents approximately 62% of the bank's March 31, 2011 Tier 1 capital, 14.88% of total securities, and 6.27% of total assets. The amount of qualified investments increased over six-fold from the previous examination. This major increase was due to the inclusion of SBA Pools and SBA Certificates as qualified investments. These investments do not explicitly impact/benefit BNB's AAs; however, since BNB has adequately addressed the community development needs of its AA, it also receives consideration for community development activities that benefit geographies within the broader statewide or regional area that includes the institution's AAs. Prior period investments still outstanding total \$13.54 million and include 11 mortgage-backed securities with book value of \$12.54 million as well as a commitment to fund \$1 million in the Lone Star Growth Capital Fund.

Among the multitude of qualified investments, the following have a distinct and direct impact on BNB's San Antonio AA, and deserve special mention:

- Mortgage-Backed Securities - BNB purchased four mortgage-backed securities (MBS) totaling \$9.2 million. The securities are an addition to the previous CRA-qualified MBS portfolio, 11 securities totaling \$12.54 million, that remains outstanding. These pools are comprised of mortgages to borrowers in the San Antonio MA who are either residing in a LMI geography or earn less than 80% of the MFI. Although all of these MBS directly benefit BNB's AA, a Federal National Mortgage Association (FNMA) Delegated Underwriting and Servicing (DUS) Bond on low-income, multi-family, transitional housing for AIDS patients, located in the San Antonio MA, highlights the bank's commitment to make qualified investments that help meet community development needs. Hope Action Care is an organization dedicated to providing education and transitional housing for low-income, Hispanic patients who are afflicted with the AIDS virus.
- Senior Housing Crime Prevention Foundation – BNB maintained its \$1 million investment in the Senior Housing Crime Prevention Foundation (SHCPF), a 501(c)3 non-profit organization. The mission of SHCPF is to reduce all aspects of crime in senior housing venues and to provide ongoing, effective crime prevention programs that ensure safe, secure, and high quality of life environments for residents of these facilities. This complex investment benefits a nursing - home facility in the San Antonio MA located in a moderate-income census tract.
- Lone Star Capital Markets and Lone Star CRA Funds – BNB invested \$800 thousand of a \$1 million total commitment in the Lone Star Capital Markets Fund (LSCMF) and \$450 thousand of a \$1.5 million total commitment in the Lone Star CRA Fund (LSCRAF). Lone Star, as a Certified Development Entity (CDE), is charged with making its investments in LMI areas in the State of Texas. These complex state-wide investments benefit the bank's AA as well as an extended regional area and were specifically structured to assist bank investors in meeting the CRA regulations.
- Valesco Commerce Street Capital, LP (SBIC) –BNB invested \$1 million in this Small Business Investment Corporation (SBIC). The fund was established to make subordinated debt and private equity investments in growth-oriented small and lower middle market businesses. The funds may also help facilitate buyouts, non-control recapitalizations, and grow capital funding. The fund's impact is primarily within the State of Texas and covers all of the bank's AAs.

- Independent Bankers Capital Fund II, LP – BNB invested \$292 thousand of a \$1 million total commitment in the Independent Bankers Capital Fund (IBCF 2). The fund operates two SBICs licensed by the SBA. The fund focuses on “mezzanine lending” and purchasing equity securities issued by established lower-middle-market companies primarily in Texas. Currently the fund does not benefit small businesses within the San Antonio MA, but has the potential to do so.

BNB also made charitable contributions during the evaluation period totaling \$792 thousand.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, BNB’s performance under the Investment Test in the San Angelo MSA, Killeen-Temple-Fort Hood MSA, Austin-Round Rock MSA, Kerr County AA, and Gillespie County AA is weaker than BNB’s overall outstanding performance under the Lending Test. BNB did make material investments directly benefiting these areas. Refer to Table 14 in Appendix C for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

BNB’s performance under the Service Test is “High Satisfactory.” Based on a full-scope review, the bank’s performance in the San Antonio MA is good.

Retail Banking Services

Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of BNB’s branch delivery system and branch openings and closings.

Delivery Systems

Branch distribution in the San Antonio MA is not comparable to the percentage of the population residing in moderate-income CTs. Four of 25 branches (16%) are located in a moderate-income CT. In comparison, 36% of the population resides in moderate-income CTs. There are no branches in low-income CTs; however, less than 3% of the population resides in low-income tracts. Ten branches (40%), including the main office, are located in middle-income CTs where 33% of the population resides. Eleven branches (44%) are located in upper-income CTs, but only 28% of the population resides in upper-income CTs.

BNB also has eight branches in San Antonio located in middle- or upper-income tracts, which are adjacent to moderate-income tracts. Two branches are also adjacent to low-income tracts and three of the banking centers are located in designated empowerment zones. The banking services, including hours of operation and available loan and deposit products, does not vary materially by bank branch or location.

BNB provides traditional banking services and products, including commercial, consumer and mortgage-related lending services at each branch with no geographic limitations for products and/or services. Consumer products and services include Relationship Checking, Free Checking, Interest Checking, Senior Citizens Accounts, Online Banking, Savings, Money

Market, and certificates of deposit (CDs), IRAs and Mortgage, Home Equity, and Consumer Loans. Business choices consist of Free and Preferred Business Checking, Business Money-Market Accounts, Preferred Savings - Treasury Management Services, Remote Deposit Express, Business Debit Cards, Merchant Account, Broadway Business Line, Business Loans, SBA Loans, Military Loan Programs, Equipment Financing, and CRE lending, as well as, Brokerage Services, Investment Management Services, and Wealth Advisory and Trust Management Services.

Internet Banking includes account inquiry, statements, stop payments, and transfers; check ordering, and bill payment service. In addition, BNB offers business on-line services of ACH origination and wire origination. The bank also offers a debit/ATM card, electronic mobile banking, and telephone banking products, as well as direct deposit, lock bags, safe deposit boxes, and night deposit services.

The 24-hour telephone banking service is automated and limited to balance inquiry. Bilingual customer representatives are available for telephone banking during business hours on weekdays and Saturdays. Eisenhower Bank offers toll free lines for callers in Germany and Italy as well as the US. Both telephone banking and "Bank by Mail" services are key services provided to military personnel through Eisenhower Bank.

No data was available to determine the effect of these services on LMI individuals; therefore, these were not key considerations in drawing our overall CRA Service Test performance conclusions.

Opening and Closing Branches

BNB's record of opening branches has not adversely affected the overall accessibility of the bank's services in both LMI CTs. There was no net change in location of branches due to branch openings and closings. BNB opened two branches and closed two branches since our previous evaluation. Both branches that opened are located in upper-income CT's and in the Austin MA. The two branches that closed were located in the San Antonio MA and in upper-income CTs.

Community Development Services

BNB's community development services efforts are excellent and its commitment to community development includes providing technical assistance on financial literacy education and banking related matters to community groups, and participating in a leadership capacity with local community development and non-profit organizations. BNB personnel have worked with 67 different community groups or government agencies over the course of the evaluation period. Activities have focused on helping LMI families find affordable housing. The most prominent qualifying services are providing financial literacy education, loan review, small business/homeownership counseling, and financial analysis and leadership skills to organizations. Major community development services include, but are not limited to:

- AVANCE teaches economically and educationally disadvantaged at-risk parents comprehensive parenting and early childhood education to promote school readiness in the children and increase the personal, educational, and economic development of low-income parents with children ages birth to three years. BNB Officers provide software training.

- Habitat for Humanity Kerrville builds and rehabilitates simple, decent houses with the help of the homeowner families, through volunteer labor and donations of money and materials. The families benefiting from the homes are 50% below the median income level. Bank Officers carry out the application, interview, and selection process for potential Habitat home candidates in Kerr County.
- Hope for the Future provides tuition assistance awards for students to attend elementary and secondary Catholic schools in the Archdiocese of San Antonio. BNB Officers served on executive committee that raised funds for programs serving low-income students.
- Neighborhood Housing Services promotes revitalization through home ownership and rehabilitation. Bank Officers serve on the Board of Directors and loan committees. Officers provide technical assistance by conducting homebuyer ownership workshops and reviewing loan applications for LMI individuals.
- SAMMinistries was founded in 1983, and is an interfaith 501(c)3 non-profit ministry organization dedicated to providing shelter and care to the homeless of San Antonio. Today, SAMMinistries is the largest service provider of direct care and shelter in the San Antonio and surrounding area. A bank officer provided technical assistance in the way of interview skill development to the homeless.
- United Way is a 501(c)3 non-profit organization with a mission to improve lives by mobilizing the caring power of communities. Numerous BNB officers serve on United Way of San Antonio committees.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, BNB's performance under the Service Test in the San Angelo MSA, Killeen-Temple-Fort Hood MSA, Austin Round Rock MSA, Kerr County AA and Gillespie County AA is weaker than the bank's overall outstanding performance under the Service Test. The bank's level of branches in LMI areas was minimal. Refer to Table 15 in Appendix C for the facts and data to support this conclusion.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan (MA) and nonmetropolitan areas that received a comprehensive examination review (designated by the term "full-scope") and those that received a less comprehensive review (designated by the term "limited-scope").

| | | |
|---|---|--|
| Time Period Reviewed | Lending Test (excludes CD Loans): (01/01/2008 to 12/31/2010) Investment & Service Tests & CD Loans: (03/17/2008 to 04/18/2011) | |
| Financial Institution | Products Reviewed | |
| Broadway National Bank (BNB) San Antonio, TX | HMDA, CRA, Community Development Loans, Community Development Investments, and Community Development Services | |
| Affiliate(s) | Affiliate Relationship | Products Reviewed |
| None | | |
| List of Assessment Areas and Type of Examination | | |
| Assessment Area | Type of Exam | Other Information |
| San Antonio MA #41700 | Full Scope | Bexar, Comal, Guadalupe, Kendall, & Medina Counties |
| Fredericksburg | Limited Scope | One branch location, Non-MA |
| Kerrville | Limited Scope | One branch location, Non-MA |
| San Angelo MA #41660 | Limited Scope | One branch location, Goodfellow AFB |
| Killeen-Temple-Ft Hood #28660 | Limited Scope | One branch location, Killeen |
| Austin - San Marcos MA #12420 | Limited Scope | Six branch locations, San Marcos, Kyle, Wimberly, Buda, Dripping Springs, Bee Cave |

Appendix B: Market Profiles for Full-Scope Areas

San Antonio MA

| Demographic Information for Full Scope Area: Bexar-Comal-Guadalupe-Kendall-Medina Co AA | | | | | | |
|---|-----------|---------------|----------------------|------------------|-----------------|---------------|
| Demographic Characteristics | # | Low % of # | Moderate % of # | Middle % of # | Upper % of # | NA* % of # |
| Geographies (Census Tracts/BNAs) | 318 | 3.77 | 37.11 | 33.65 | 24.53 | 0.94 |
| Population by Geography | 1,623,022 | 2.58 | 36.46 | 33.10 | 27.85 | 0.01 |
| Owner-Occupied Housing by Geography | 362,531 | 1.60 | 29.56 | 33.64 | 35.20 | 0.01 |
| Business by Geography | 119,051 | 1.56 | 24.86 | 33.05 | 40.35 | 0.18 |
| Farms by Geography | 3,271 | 0.73 | 16.78 | 40.45 | 41.91 | 0.12 |
| Family Distribution by Income Level | 410,957 | 21.07 | 17.91 | 20.45 | 40.57 | 0.00 |
| Distribution of Low and Moderate Income Families throughout AA Geographies | 160,202 | 4.23 | 51.85 | 31.56 | 12.35 | 0.00 |
| Median Family Income (MFI) | | 44,591 | Median Housing Value | | | 84,446 |
| HUD Adjusted MFI for 2010 | | 57,800 | Unemployment Rate | | | 2.6% |
| Households Below Poverty Level | | 14% | (2000 US Census) | | | |

(*) The NA category consists of geographies that have not been assigned an income classification.

Source: 2000 US Census and 2010 HUD updated MFI

The AA is comprised of 278 CTs, 44.3% of which are considered LMI. The 2000 Census data reflects that 14.3% of the households in Bexar County are below the poverty level.

According to 2000 Census data, the AA has a total population of 1.4 million. There are 542,031 housing units in the AA, of which 55.2% are owner-occupied, 35% are renter-occupied, and 5.98% are vacant. Approximately 22% of families in the AA are considered low-income. Moderate-income families approximate 18.1%, while middle- and upper- income families make up the remaining 59.9%. The median housing value is \$82,887, with the median age of housing stock at 17 years.

Competition for financial services in the AA is very strong. The June 30, 2009 FDIC Deposit Market Share Report for Bexar County, TX AA shows \$49.2 billion of deposits divided among 42 financial institutions. The AA includes 238 branches from multi-national banks and several regional community banks. BNB's deposits in this AA total \$39 million, which equates to a 0.07% deposit market share.

Bexar County is home to the city of San Antonio, second largest city in Texas. San Antonio has a favorable business climate and is ranked as the fourth best city in the United States for creative professionals by Fast Company Magazine. The magazine cited San Antonio's affordability, family-friendly atmosphere and Hispanic-rich culture as top selling points. Top employers for Bexar County include 3 military bases followed by USAA Insurance Company and the Methodist Hospital System. Bexar County is also the home of 10 universities and colleges with a combined student population of 100,000.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the metropolitan area/assessment area (MA/AA); (2) Partially geocoded loans (loans where no CT is provided) cannot be broken down by income geographies and, therefore, are only reflected in the Total Loans in Core Tables 2 through 7 and part of Table 13; and (3) Partially geocoded loans are included in the Total Loans and % Bank Loans Column in Core Tables 8 through 12 and part of Table 13.

The following is a listing and brief description of the tables:

- Table 1 Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/AA. Community development loans to statewide or regional entities or made outside the bank’s AA may receive positive CRA consideration. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. Refer to the CRA section of the Compliance Policy Intranet page for guidance on table placement.
- Table 1 Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/AA. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2 Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3 Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4 Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5 Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multi-family loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multi-family housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.

- Table 6 Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.
- Table 7 Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's AA.
- Table 8 Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/AA. The table also presents market share information based on the most recent aggregate market data available.
- Table 9 Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10 Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11 Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12 Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm. Market share information is presented based on the most recent aggregate market data available.

Table 13 Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/AA.

Table 14 Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding and tracked and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's AA. See Interagency Q&As __.12 (i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. Refer to the CRA section of the Compliance Policy Intranet page for guidance on table placement.

Table 15 Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Institution ID: BROADWAY NATIONAL BANK (1000014447) (Included)

Table 1. Lending Volume

| LENDING VOLUME | | | | | | | | | | | | |
|---|---|---------------|------------|---------------------------|------------|----------------------|------------|---|------------|----------------------|------------|--|
| Geography: BROADWAY NB 2008-2010 | | | | | | | | | | | | |
| Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010 | | | | | | | | | | | | |
| Assessment Area (2010): | % of Rated Area Loans (#) in MA/AA [*] | Home Mortgage | | Small Loans to Businesses | | Small Loans to Farms | | Community Development Loans ^{**} | | Total Reported Loans | | % of Rated Area Deposits in MA/AA ^{***} |
| | | # | \$ (000's) | # | \$ (000's) | # | \$ (000's) | # | \$ (000's) | # | \$ (000's) | |
| Full Review: | | | | | | | | | | | | |
| Bexar-Comal-Guadalupe Medit | 87.31 | 452 | 73,003 | 2,016 | 300,170 | 36 | 4,411 | 66 | 53,500 | 2,570 | 431,084 | 0.00 |
| Limited Review: | | | | | | | | | | | | |
| B | 0.28 | 2 | 104 | 6 | 171 | 0 | 0 | 0 | 0 | 8 | 275 | 0.00 |
| Gillesp | 1.60 | 21 | 1,773 | 25 | 1,470 | 0 | 0 | 0 | 0 | 46 | 3,243 | 0.00 |
| Ha | 9.14 | 48 | 6,236 | 209 | 24,251 | 5 | 162 | 0 | 0 | 262 | 30,649 | 0.00 |
| Ke | 1.01 | 13 | 943 | 16 | 1,001 | 0 | 0 | 0 | 0 | 29 | 1,944 | 0.00 |
| Tom Gre | 0.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.00 |
| Tray | 0.66 | 3 | 854 | 16 | 3,639 | 0 | 0 | 0 | 0 | 19 | 4,493 | 0.00 |

^{*} Loan Data as of December 31, 2010. Rated area refers to either state or multi-state MA rating area.

^{**} The evaluation period for Community Development Loans is from January 01, 2008 to December 31, 2010.

^{***} Deposit Data as of April 08, 2011. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

Institution ID: BROADWAY NATIONAL BANK (1000014447) (Included)

Table 2. Geographic Distribution of Home Purchase Loans

| Geographic Distribution: HOME PURCHASE Geography: BROADWAY NB 2008-2010 Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010 | | | | | | | | | | | | | | | |
|---|---------------------------|---------------|------------------------|-------------------|-----------------------------|--------------|---------------------------|--------------|--------------------------|--------------|---------------------------------|------|------|------|------|
| Assessment Area: | Total Home Purchase Loans | | Low-Income Geographies | | Moderate-Income Geographies | | Middle-Income Geographies | | Upper-Income Geographies | | Market Share (%) by Geography * | | | | |
| | # | % of Total ** | % Owner Occ Units *** | % BANK Loans **** | % Owner Occ Units*** | % BANK Loans | % Owner Occ Units*** | % BANK Loans | % Owner Occ Units*** | % BANK Loans | Overall | Low | Mod | Mid | Upp |
| Full Review: | | | | | | | | | | | | | | | |
| Bexar-Comal-Guadalupe-Kendall-Medina Co AA | 142 | 81.61 | 1.60 | 0.00 | 29.56 | 7.04 | 33.64 | 25.35 | 35.20 | 67.61 | 0.17 | 0.00 | 0.08 | 0.14 | 0.20 |
| Limited Review: | | | | | | | | | | | | | | | |
| Bell Co AA | 0 | 0.00 | 0.80 | 0.00 | 17.32 | 0.00 | 67.10 | 0.00 | 14.79 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Gillespie Co AA | 5 | 2.87 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100.00 | 100.00 | 1.34 | 0.00 | 0.00 | 0.00 | 1.34 |
| Hays Co AA | 22 | 12.64 | 3.63 | 0.00 | 20.63 | 18.18 | 47.86 | 77.27 | 27.89 | 4.55 | 0.31 | 0.00 | 0.23 | 0.43 | 0.00 |
| Kerr Co AA | 2 | 1.15 | 0.00 | 0.00 | 0.00 | 0.00 | 77.68 | 50.00 | 22.32 | 50.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Tom Green Co AA | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Travis Co AA | 3 | 1.72 | 0.00 | 0.00 | 0.00 | 0.00 | 5.98 | 33.33 | 94.02 | 66.67 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

* Based on 2008 Peer Mortgage Data (Western)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: BROADWAY NATIONAL BANK (1000014447) (Included)

Table 3. Geographic Distribution of Home Improvement Loans

| Geographic Distribution: HOME IMPROVEMENT | | | | | | | | | | | | | | | Geography: BROADWAY NB 2008-2010 | | | | | Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010 | | | | |
|--|------------------------------|---------------|------------------------|-------------------|-----------------------------|--------------|---------------------------|--------------|--------------------------|--------------|---------------------------------|------|------|------|----------------------------------|--|--|--|--|---|--|--|--|--|
| Assessment Area: | Total Home Improvement Loans | | Low-Income Geographies | | Moderate-Income Geographies | | Middle-Income Geographies | | Upper-Income Geographies | | Market Share (%) by Geography * | | | | | | | | | | | | | |
| | # | % of Total ** | % Owner Occ Units *** | % BANK Loans **** | % Owner Occ Units*** | % BANK Loans | % Owner Occ Units*** | % BANK Loans | % Owner Occ Units*** | % BANK Loans | Overall | Low | Mod | Mid | Upp | | | | | | | | | |
| Full Review: | | | | | | | | | | | | | | | | | | | | | | | | |
| Bexar-Comal-Guadalupe-Kendall-Medina Co AA | 161 | 82.56 | 1.60 | 0.62 | 29.56 | 14.29 | 33.64 | 39.13 | 35.20 | 45.96 | 1.51 | 0.00 | 0.64 | 1.99 | 1.63 | | | | | | | | | |
| Limited Review: | | | | | | | | | | | | | | | | | | | | | | | | |
| Bell Co AA | 2 | 1.03 | 0.80 | 0.00 | 17.32 | 0.00 | 67.10 | 100.00 | 14.79 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | | | | | | | | | |
| Gillespie Co AA | 11 | 5.64 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100.00 | 100.00 | 19.35 | 0.00 | 0.00 | 0.00 | 19.35 | | | | | | | | | |
| Hays Co AA | 15 | 7.69 | 3.63 | 0.00 | 20.63 | 0.00 | 47.86 | 73.33 | 27.89 | 26.67 | 0.38 | 0.00 | 0.00 | 0.71 | 0.00 | | | | | | | | | |
| Kerr Co AA | 6 | 3.08 | 0.00 | 0.00 | 0.00 | 0.00 | 77.68 | 66.67 | 22.32 | 33.33 | 2.86 | 0.00 | 0.00 | 4.76 | 0.00 | | | | | | | | | |
| Tom Green Co AA | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | | | | | | | | | |
| Travis Co AA | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 5.98 | 0.00 | 94.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | | | | | | | | | |

* Based on 2008 Peer Mortgage Data (Western)

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

**** Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: BROADWAY NATIONAL BANK (1000014447) (Included)

Table 4. Geographic Distribution of Home Mortgage Refinance Loans

| Geographic Distribution: HOME MORTGAGE REFINANCE Geography: BROADWAY NB 2008-2010 Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010 | | | | | | | | | | | | | | | |
|---|-------------------------------------|--------------------------|----------------------------------|------------------------------|----------------------------------|--------------|----------------------------------|--------------|----------------------------------|--------------|--|------|------|------|------|
| Assessment Area: | Total Home Mortgage Refinance Loans | | Low-Income Geographies | | Moderate-Income Geographies | | Middle-Income Geographies | | Upper-Income Geographies | | Market Share (%) by Geography [*] | | | | |
| | # | % of Total ^{**} | % Owner Occ Units ^{***} | % BANK Loans ^{****} | % Owner Occ Units ^{***} | % BANK Loans | % Owner Occ Units ^{***} | % BANK Loans | % Owner Occ Units ^{***} | % BANK Loans | Overall | Low | Mod | Mid | Upp |
| Full Review: | | | | | | | | | | | | | | | |
| Bexar-Comal-Guadalupe-Kendall-Medina Co AA | 145 | 87.88 | 1.60 | 0.00 | 29.56 | 17.24 | 33.64 | 29.66 | 35.20 | 53.10 | 0.27 | 0.00 | 0.33 | 0.23 | 0.28 |
| Limited Review: | | | | | | | | | | | | | | | |
| Bell Co AA | 0 | 0.00 | 0.80 | 0.00 | 17.32 | 0.00 | 67.10 | 0.00 | 14.79 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Gillespie Co AA | 5 | 3.03 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100.00 | 100.00 | 2.00 | 0.00 | 0.00 | 0.00 | 2.00 |
| Hays Co AA | 10 | 6.06 | 3.63 | 0.00 | 20.63 | 10.00 | 47.86 | 70.00 | 27.89 | 20.00 | 0.28 | 0.00 | 0.00 | 0.42 | 0.15 |
| Kerr Co AA | 5 | 3.03 | 0.00 | 0.00 | 0.00 | 0.00 | 77.68 | 60.00 | 22.32 | 40.00 | 1.04 | 0.00 | 0.00 | 1.24 | 0.00 |
| Tom Green Co AA | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Travis Co AA | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 5.98 | 0.00 | 94.02 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

^{*} Based on 2008 Peer Mortgage Data (Western)

^{**} Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

^{***} Percentage of Owner Occupied Units is the number of owner occupied units in a particular geography divided by the number of owner occupied housing units in the area based on 2000 Census information.

^{****} Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

INSTITUTION ID: BROADWAY NATIONAL BANK (1000014447) (INCLUDED)

Table 5. Geographic Distribution of Multi-family Loans

| Geographic Distribution: MULTIFAMILY | | Geography: BROADWAY NB 2008-2010 | | | | | Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010 | | | | | Market Share (%) by Geography * | | | | |
|--|-------------------------|----------------------------------|------------------------|-------------------|-----------------------------|--------------|---|--------------|--------------------------|--------------|---------|---------------------------------|------|------|------|--|
| Assessment Area: | Total Multifamily Loans | | Low-Income Geographies | | Moderate-Income Geographies | | Middle-Income Geographies | | Upper-Income Geographies | | Overall | Low | Mod | Mid | Upp | |
| | # | % of Total ** | % of MF Units *** | % BANK Loans **** | % MF Units*** | % BANK Loans | % MF Units*** | % BANK Loans | % MF Units*** | % BANK Loans | | | | | | |
| Full Review: | | | | | | | | | | | | | | | | |
| Bexar-Comal-Guadalupe-Kendall-Medina Co AA | 4 | 80.00 | 1.82 | 0.00 | 35.36 | 25.00 | 40.73 | 0.00 | 22.09 | 75.00 | 1.01 | 0.00 | 0.00 | 0.00 | 3.03 | |
| Limited Review: | | | | | | | | | | | | | | | | |
| Bell Co AA | 0 | 0.00 | 8.45 | 0.00 | 55.35 | 0.00 | 26.71 | 0.00 | 9.49 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Gillespie Co AA | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Hays Co AA | 1 | 20.00 | 43.66 | 100.00 | 28.45 | 0.00 | 27.44 | 0.00 | 0.45 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Kerr Co AA | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 93.27 | 0.00 | 6.73 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Tom Green Co AA | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Travis Co AA | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 1.11 | 0.00 | 98.89 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |

* Based on 2008 Peer Mortgage Data (Western)

** Multi-family loans originated and purchased in the MA/AA as a percentage of all multi-family loans originated and purchased in the rated area.

*** Percentage of Multi Family Units is the number of multi family units in a particular geography divided by the number of multifamily housing units in the area based on 2000 Census information.

**** Multifamily loan distribution includes Home Purchases, Home Improvement and Refinances.

Institution ID: BROADWAY NATIONAL BANK (1000014447) (Included)

Table 6. Geographic Distribution of Small Loans to Businesses

| Geographic Distribution: SMALL LOANS TO BUSINESSES | | | | | | | | | | | | | | | Geography: BROADWAY NB 2008-2010 | | | | | Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010 | | | | |
|--|----------------------------|---------------|------------------------|--------------|-----------------------------|--------------|---------------------------|--------------|--------------------------|--------------|---------------------------------|------|------|------|----------------------------------|--|--|--|--|---|--|--|--|--|
| Assessment Area: | Total Small Business Loans | | Low-Income Geographies | | Moderate-Income Geographies | | Middle-Income Geographies | | Upper-Income Geographies | | Market Share (%) by Geography * | | | | | | | | | | | | | |
| | # | % of Total ** | % of Businesses *** | % BANK Loans | % of Businesses*** | % BANK Loans | % of Businesses*** | % BANK Loans | % of Businesses*** | % BANK Loans | Overall | Low | Mod | Mid | Upp | | | | | | | | | |
| Full Review: | | | | | | | | | | | | | | | | | | | | | | | | |
| Bexar-Comal-Guadalupe-Kendall-Medina Co AA | 2,012 | 88.09 | 1.56 | 3.53 | 24.86 | 21.07 | 33.05 | 33.55 | 40.35 | 41.85 | 1.83 | 4.10 | 1.65 | 1.97 | 1.82 | | | | | | | | | |
| Limited Review: | | | | | | | | | | | | | | | | | | | | | | | | |
| Bell Co AA | 6 | 0.26 | 10.16 | 0.00 | 24.06 | 16.67 | 55.05 | 83.33 | 10.73 | 0.00 | 0.02 | 0.00 | 0.00 | 0.06 | 0.00 | | | | | | | | | |
| Gillespie Co AA | 25 | 1.09 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100.00 | 100.00 | 1.78 | 0.00 | 0.00 | 0.73 | 2.04 | | | | | | | | | |
| Hays Co AA | 209 | 9.15 | 4.38 | 6.22 | 25.98 | 30.14 | 43.10 | 53.59 | 26.53 | 10.05 | 1.88 | 0.00 | 2.69 | 2.78 | 0.59 | | | | | | | | | |
| Kerr Co AA | 16 | 0.70 | 0.00 | 0.00 | 0.00 | 0.00 | 87.98 | 93.75 | 12.02 | 6.25 | 0.55 | 0.00 | 0.00 | 0.62 | 0.42 | | | | | | | | | |
| Tom Green Co AA | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | | | | | | | | | |
| Travis Co AA | 16 | 0.70 | 0.00 | 0.00 | 0.00 | 0.00 | 9.27 | 12.50 | 90.73 | 87.50 | 0.08 | 0.00 | 0.10 | 0.04 | 0.11 | | | | | | | | | |

* Based on 2009 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2010).

Institution ID: BROADWAY NATIONAL BANK (1000014447) (Included)

Table 7. Geographic Distribution of Small Loans to Farms

| Geographic Distribution: SMALL LOANS TO FARMS Geography: BROADWAY NB 2008-2010 Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010 | | | | | | | | | | | | | | | |
|--|------------------------|---------------|------------------------|--------------|-----------------------------|--------------|---------------------------|--------------|--------------------------|--------------|---------------------------------|------|------|-------|------|
| Assessment Area: | Total Small Farm Loans | | Low-Income Geographies | | Moderate-Income Geographies | | Middle-Income Geographies | | Upper-Income Geographies | | Market Share (%) by Geography * | | | | |
| | # | % of Total ** | % of Farms *** | % BANK Loans | % of Farms*** | % BANK Loans | % of Farms*** | % BANK Loans | % of Farms*** | % BANK Loans | Overall | Low | Mod | Mid | Upp |
| Full Review: | | | | | | | | | | | | | | | |
| Bexar-Comal-Guadalupe-Kendall-Medina Co AA | 36 | 87.80 | 0.73 | 0.00 | 16.78 | 11.11 | 40.45 | 83.33 | 41.91 | 5.56 | 5.65 | 0.00 | 3.70 | 10.53 | 0.00 |
| Limited Review: | | | | | | | | | | | | | | | |
| Bell Co AA | 0 | 0.00 | 3.64 | 0.00 | 15.45 | 0.00 | 67.27 | 0.00 | 13.64 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Gillespie Co AA | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100.00 | 0.00 | 1.06 | 0.00 | 0.00 | 0.00 | 1.56 |
| Hays Co AA | 5 | 12.20 | 3.75 | 0.00 | 13.94 | 0.00 | 46.38 | 80.00 | 35.92 | 20.00 | 6.25 | 0.00 | 0.00 | 16.67 | 0.00 |
| Kerr Co AA | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 83.33 | 0.00 | 16.67 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Tom Green Co AA | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 100.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Travis Co AA | 0 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 15.43 | 0.00 | 84.57 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

* Based on 2009 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2010).

Institution ID: BROADWAY NATIONAL BANK (1000014447) (Included)

Table 8. Borrower Distribution of Home Purchase Loans

| Borrower Distribution: HOME PURCHASE | | Geography: BROADWAY NB 2008-2010 | | | | | Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010 | | | | | Market Share * | | | | |
|--|---------------------------|----------------------------------|----------------------|-------------------|---------------------------|------------------|---|------------------|------------------------|------------------|----------------|----------------|------|------|------|--|
| Assessment Area: | Total Home Purchase Loans | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Market Share * | | | | | |
| | # | % of Total ** | % Families *** | % BANK Loans **** | % Families ¹ | % BANK Loans**** | % Families*** | % BANK Loans**** | % Families*** | % BANK Loans**** | Overall | Low | Mod | Mid | Upp | |
| Full Review: | | | | | | | | | | | | | | | | |
| Bexar-Comal-Guadalupe-Kendall-Medina Co AA | 142 | 81.61 | 21.07 | 0.00 | 17.91 | 2.75 | 20.45 | 7.34 | 40.57 | 89.91 | 0.15 | 0.00 | 0.02 | 0.04 | 0.26 | |
| Limited Review: | | | | | | | | | | | | | | | | |
| Bell Co AA | 0 | 0.00 | 19.21 | 0.00 | 22.77 | 0.00 | 23.79 | 0.00 | 34.23 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Gillespie Co AA | 5 | 2.87 | 10.87 | 20.00 | 14.38 | 0.00 | 22.05 | 0.00 | 52.70 | 80.00 | 1.50 | 0.00 | 0.00 | 0.00 | 2.08 | |
| Hays Co AA | 22 | 12.64 | 19.47 | 0.00 | 20.57 | 18.75 | 24.04 | 18.75 | 35.91 | 62.50 | 0.24 | 0.00 | 0.20 | 0.18 | 0.35 | |
| Kerr Co AA | 2 | 1.15 | 19.28 | 0.00 | 17.45 | 0.00 | 22.77 | 0.00 | 40.50 | 100.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Tom Green Co AA | 0 | 0.00 | 21.21 | 0.00 | 19.19 | 0.00 | 37.37 | 0.00 | 22.22 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Travis Co AA | 3 | 1.72 | 5.99 | 0.00 | 7.43 | 0.00 | 12.55 | 33.33 | 74.03 | 66.67 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |

* Based on 2008 Peer Mortgage Data (Western)

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 22.4% of loans originated and purchased by bank.

¹ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: BROADWAY NATIONAL BANK (1000014447) (Included)

Table 9. Borrower Distribution of Home Improvement Loans

| Borrower Distribution: HOME IMPROVEMENT | | Geography: BROADWAY NB 2008-2010 | | | | | Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010 | | | | | | | | | |
|--|------------------------------|----------------------------------|---------------------------|------------------------------|---------------------------|------------------------------|---|------------------------------|---------------------------|------------------------------|---------------------------|------|------|-------|-------|--|
| Assessment Area: | Total Home Improvement Loans | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Market Share [*] | | | | | |
| | # | % of Total ^{**} | % Families ^{***} | % BANK Loans ^{****} | % Families ² | % BANK Loans ^{****} | % Families ^{***} | % BANK Loans ^{****} | % Families ^{***} | % BANK Loans ^{****} | Overall | Low | Mod | Mid | Upp | |
| Full Review: | | | | | | | | | | | | | | | | |
| Bexar-Comal-Guadalupe-Kendall-Medina Co AA | 161 | 82.56 | 21.07 | 6.21 | 17.91 | 14.29 | 20.45 | 24.22 | 40.57 | 55.28 | 1.59 | 1.14 | 1.32 | 1.69 | 1.69 | |
| Limited Review: | | | | | | | | | | | | | | | | |
| Bell Co AA | 2 | 1.03 | 19.21 | 0.00 | 22.77 | 0.00 | 23.79 | 0.00 | 34.23 | 100.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Gillespie Co AA | 11 | 5.64 | 10.87 | 0.00 | 14.38 | 0.00 | 22.05 | 0.00 | 52.70 | 100.00 | 19.35 | 0.00 | 0.00 | 0.00 | 30.00 | |
| Hays Co AA | 15 | 7.69 | 19.47 | 0.00 | 20.57 | 6.67 | 24.04 | 33.33 | 35.91 | 60.00 | 0.40 | 0.00 | 0.00 | 0.00 | 0.76 | |
| Kerr Co AA | 6 | 3.08 | 19.28 | 0.00 | 17.45 | 0.00 | 22.77 | 66.67 | 40.50 | 33.33 | 3.03 | 0.00 | 0.00 | 14.29 | 0.00 | |
| Tom Green Co AA | 0 | 0.00 | 21.21 | 0.00 | 19.19 | 0.00 | 37.37 | 0.00 | 22.22 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |
| Travis Co AA | 0 | 0.00 | 5.99 | 0.00 | 7.43 | 0.00 | 12.55 | 0.00 | 74.03 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | |

^{*} Based on 2008 Peer Mortgage Data (Western)

^{**} Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

^{***} Percentage of Families is based on the 2000 Census information.

^{****} As a percentage of loans with borrower income information available. No information was available for 0.0% of loans originated and purchased by bank.

² Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: BROADWAY NATIONAL BANK (10000014447) (Included)

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

| Borrower Distribution: HOME MORTGAGE REFINANCE Geography: BROADWAY NB 2008-2010 Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010 | | | | | | | | | | | | | | | |
|---|-------------------------------------|---------------|----------------------|-------------------|---------------------------|-------------------|-------------------------|------------------|------------------------|------------------|----------------|------|-------|------|------|
| Assessment Area: | Total Home Mortgage Refinance Loans | | Low-Income Borrowers | | Moderate-Income Borrowers | | Middle-Income Borrowers | | Upper-Income Borrowers | | Market Share * | | | | |
| | # | % of Total ** | % Families ** | % BANK Loans **** | % Families ³ | % BANK Loans **** | % Families*** | % BANK Loans**** | % Families*** | % BANK Loans**** | Overall | Low | Mod | Mid | Upp |
| Full Review: | | | | | | | | | | | | | | | |
| Bexar-Comal-Guadalupe-Kendall-Medina Co AA | 145 | 87.88 | 21.07 | 7.30 | 17.91 | 9.49 | 20.45 | 18.98 | 40.57 | 64.23 | 0.36 | 0.90 | 0.26 | 0.33 | 0.35 |
| Limited Review: | | | | | | | | | | | | | | | |
| Bell Co AA | 0 | 0.00 | 19.21 | 0.00 | 22.77 | 0.00 | 23.79 | 0.00 | 34.23 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Gillespie Co AA | 5 | 3.03 | 10.87 | 0.00 | 14.38 | 20.00 | 22.05 | 40.00 | 52.70 | 40.00 | 2.27 | 0.00 | 12.50 | 3.57 | 1.05 |
| Hays Co AA | 10 | 6.06 | 19.47 | 22.22 | 20.57 | 11.11 | 24.04 | 11.11 | 35.91 | 55.56 | 0.28 | 1.30 | 0.00 | 0.00 | 0.39 |
| Kerr Co AA | 5 | 3.03 | 19.28 | 0.00 | 17.45 | 20.00 | 22.77 | 0.00 | 40.50 | 80.00 | 1.25 | 0.00 | 5.56 | 0.00 | 0.90 |
| Tom Green Co AA | 0 | 0.00 | 21.21 | 0.00 | 19.19 | 0.00 | 37.37 | 0.00 | 22.22 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Travis Co AA | 0 | 0.00 | 5.99 | 0.00 | 7.43 | 0.00 | 12.55 | 0.00 | 74.03 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

* Based on 2008 Peer Mortgage Data (Western)

** Home refinance loans originated and purchased in the MA/AA as a percentage of all home refinance loans originated and purchased in the rated area.

*** Percentage of Families is based on the 2000 Census information.

**** As a percentage of loans with borrower income information available. No information was available for 5.5% of loans originated and purchased by bank.

³ Data shown includes only One to Four-family and manufactured housing. (Property type of 1 or 2)

Institution ID: BROADWAY NATIONAL BANK (1000014447) (Included)

Table 11. Borrower Distribution of Small Loans to Businesses

| Borrower Distribution: SMALL LOANS TO BUSINESSES | | Geography: BROADWAY NB 2008-2010 | | | Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010 | | | | |
|--|---------------------------------|----------------------------------|---|-------------------|---|-------------------------|---------------------------|----------------|-------------------------|
| Assessment Area: | Total Small Loans to Businesses | | Businesses With Revenues of \$1 million or less | | Loans by Original Amount Regardless of Business Size | | | Market Share * | |
| | # | % of Total ** | % of Businesses *** | % BANK Loans **** | \$100,000 or less | >\$100,000 to \$250,000 | >\$250,000 to \$1,000,000 | All | Rev\$ 1 Million or Less |
| Full Review: | | | | | | | | | |
| Bexar-Comal-Guadalupe-Kendall-Medina Co AA | 2,016 | 88.11 | 78.79 | 31.50 | 64.14 | 19.25 | 16.62 | 1.83 | 2.35 |
| Limited Review: | | | | | | | | | |
| Bell Co AA | 6 | 0.26 | 77.30 | 50.00 | 100.00 | 0.00 | 0.00 | 0.02 | 0.13 |
| Gillespie Co AA | 25 | 1.09 | 82.68 | 40.00 | 80.00 | 16.00 | 4.00 | 1.78 | 2.37 |
| Hays Co AA | 209 | 9.13 | 81.49 | 50.72 | 69.86 | 18.66 | 11.48 | 1.88 | 3.14 |
| Kerr Co AA | 16 | 0.70 | 80.95 | 56.25 | 81.25 | 12.50 | 6.25 | 0.55 | 0.49 |
| Tom Green Co AA | 0 | 0.00 | 23.40 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Travis Co AA | 16 | 0.70 | 82.81 | 37.50 | 37.50 | 31.25 | 31.25 | 0.08 | 0.18 |

* Based on 2009 Peer Small Business Data -- US and PR

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2010).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 17.22% of small loans to businesses originated and purchased by the bank.

Institution ID: BROADWAY NATIONAL BANK (1000014447) (Included)

Table 12. Borrower Distribution of Small Loans to Farms

| Borrower Distribution: SMALL LOANS TO FARMS | | Geography: BROADWAY NB 2008-2010 | | | Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010 | | | | |
|---|----------------------------|----------------------------------|--|-------------------|---|-------------------------|-------------------------|----------------|-------------------------|
| Assessment Area: | Total Small Loans to Farms | | Farms With Revenues of \$1 million or less | | Loans by Original Amount Regardless of Farm Size | | | Market Share * | |
| | # | % of Total ** | % of Farms *** | % BANK Loans **** | \$100,000 or less | >\$100,000 to \$250,000 | >\$250,000 to \$500,000 | All | Rev\$ 1 Million or Less |
| Full Review: | | | | | | | | | |
| Bexar-Comal-Guadalupe-Kendall-Medina Co AA | 36 | 87.80 | 97.00 | 72.22 | 55.56 | 36.11 | 8.33 | 5.65 | 5.20 |
| Limited Review: | | | | | | | | | |
| Bell Co AA | 0 | 0.00 | 97.27 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Gillespie Co AA | 0 | 0.00 | 98.77 | 0.00 | 0.00 | 0.00 | 0.00 | 1.06 | 1.27 |
| Hays Co AA | 5 | 12.20 | 99.20 | 80.00 | 100.00 | 0.00 | 0.00 | 6.25 | 3.70 |
| Kerr Co AA | 0 | 0.00 | 98.33 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Tom Green Co AA | 0 | 0.00 | 100.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Travis Co AA | 0 | 0.00 | 95.43 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

* Based on 2009 Peer Small Business Data -- US and PR

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2010).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 14.63% of small loans to farms originated and purchased by the bank.

Institution ID: BROADWAY NATIONAL BANK (1000014447) (Included)

Table 14. Qualified Investments

| QUALIFIED INVESTMENTS | | | | | | | | | |
|--|---------------------------|-----------|----------------------------|---|-------------------|-----------|------------|------------------------|-----------|
| Geography: BROADWAY NB 2008-2010 | | | | Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010 | | | | | |
| Assessment Area: | Prior Period Investments* | | Current Period Investments | | Total Investments | | | Unfunded Commitments** | |
| | # | \$(000's) | # | \$(000's) | # | \$(000's) | % of Total | # | \$(000's) |
| Full Review: | | | | | | | | | |
| Bexar-Comal-Guadalupe-Kendall-Medina Co AA | 6 | 5,226 | 0 | 0 | 6 | 5,226 | 3.54 | 0 | 0 |
| Limited Review: | | | | | | | | | |
| Bell Co AA | 0 | 0 | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 |
| Gillespie Co AA | 0 | 0 | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 |
| Hays Co AA | 0 | 0 | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 |
| Kerr Co AA | 0 | 0 | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 |
| Tom Green Co AA | 0 | 0 | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 |
| Travis Co AA | 0 | 0 | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 |
| Statewide/Regional Investment | 7 | 9,314 | 29 | 132,705 | 36 | 142,019 | 96.45 | 3 | 2,757 |

* 'Prior Period Investments' means investments made in a previous period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

Institution ID: BROADWAY NATIONAL BANK (1000014447) (Included)

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

| DISTRIBUTION OF BRANCH DELIVERY SYSTEM & BRANCH OPENINGS/CLOSINGS Geography: BROADWAY NB 2008-2010 Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010 | | | | | | | | | | | | | | | | | |
|--|--------------------------------|--------------------|--------------------------------|---|--------|-------|-------|--------------------------|----------------------|---|-----|-----|-----|---------------------------------------|-------|--------|--------|
| MA/Assessment Area: | Deposits | Branches | | | | | | Branch Openings/Closings | | | | | | Population | | | |
| | % of Rated Area Deposits in AA | # of BANK Branches | % of Rated Area Branches in AA | Location of Branches by Income of Geographies (%) | | | | # of Branch Openings | # of Branch Closings | Net change in Location of Branches (+ or -) | | | | % of Population within Each Geography | | | |
| | | | | Low | Mod | Mid | Upp | | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Full Review: | | | | | | | | | | | | | | | | | |
| Bexar-Comal-Guadalupe-Kendall-Medina Co AA | 89.35 | 26 | 72.22 | 0.00 | 15.38 | 39.46 | 46.15 | 0 | 2 | 0 | 0 | 0 | -2 | 2.58 | 36.46 | 33.10 | 27.85 |
| Limited Review: | | | | | | | | | | | | | | | | | |
| Bell Co AA | 1.21 | 1 | 2.86 | 0.00 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 | 0 | 0 | 0 | 3.15 | 27.18 | 56.39 | 13.28 |
| Gillespie Co AA | 1.84 | 1 | 2.86 | 0.00 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0.00 | 0.00 | 0.00 | 100.00 |
| Hays Co AA | 4.09 | 5 | 11.43 | 0.00 | 200.00 | 0.00 | 0.00 | 1 | 0 | 0 | 0 | 0 | +1 | 10.43 | 28.34 | 41.23 | 20.00 |
| Kerr Co AA | 3.07 | 1 | 2.86 | 0.00 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0.00 | 0.00 | 84.35 | 15.65 |
| Tom Green Co AA | .01 | 1 | 2.86 | 0.00 | 0.00 | 0.00 | 0.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0.00 | 0.00 | 100.00 | 0.00 |
| Travis Co AA | 0.00 | 1 | 2.86 | 0.00 | 0.00 | 0.00 | 0.00 | 1 | 0 | 0 | 0 | 0 | +1 | 0.00 | 0.00 | 6.67 | 93.33 |

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Distribution of Branch and ATM Delivery System

| Distribution of Branch and ATM Delivery System | | Geography: BROADWAY NB 2008-2010 | | | | | | Evaluation Period: JANUARY 1, 2008 TO DECEMBER 31, 2010 | | | | | | | | | |
|--|--------------------------|----------------------------------|--------------------------|---|--------|-------|-------|---|----------------------|---|-----|-----|-----|---------------------------------------|-------|--------|--------|
| MA/Assessment Area: | Deposits | Branches | | | | | | ATMs | | | | | | Population | | | |
| | % of Total Bank Deposits | # of Bank Branches | % of Total Bank Branches | Location of Branches by Income of Geographies (%) | | | | # of Bank ATMs | % of Total Bank ATMs | Location of ATMs by Income of Geographies | | | | % of Population within Each Geography | | | |
| | | | | Low | Mod | Mid | Upp | | | Low | Mod | Mid | Upp | Low | Mod | Mid | Upp |
| Full Review: | | | | | | | | | | | | | | | | | |
| Bexar-Comal-Guadalupe-Kendall-Medina Co AA | 89.35 | 26 | 72.22 | 0.00 | 15.38 | 39.46 | 46.15 | 51 | 0.00 | 0 | 5 | 31 | 15 | 2.58 | 36.46 | 33.10 | 27.85 |
| Limited Review: | | | | | | | | | | | | | | | | | |
| Bell Co AA | 1.21 | 1 | 2.86 | 0.00 | 0.00 | 0.00 | 0.00 | 2 | 3.16 | 0 | 0 | 2 | 0 | 3.15 | 27.18 | 56.39 | 13.28 |
| Gillespie Co AA | 1.84 | 1 | 2.86 | 0.00 | 0.00 | 0.00 | 0.00 | 1 | 1.58 | 0 | 0 | 0 | 1 | 0.00 | 0.00 | 0.00 | 100.00 |
| Hays Co AA | 4.09 | 5 | 11.43 | 0.00 | 200.00 | 0.00 | 0.00 | 5 | 7.94 | 0 | 1 | 2 | 2 | 10.43 | 28.34 | 41.23 | 20.00 |
| Kerr Co AA | 3.07 | 1 | 2.86 | 0.00 | 0.00 | 0.00 | 0.00 | 1 | 1.58 | 0 | 0 | 1 | 0 | 0.00 | 0.00 | 84.35 | 15.65 |
| Tom Green Co AA | .01 | 1 | 2.86 | 0.00 | 0.00 | 0.00 | 0.00 | 2 | 3.16 | 0 | 0 | 2 | 0 | 0.00 | 0.00 | 100.00 | 0.00 |
| Travis Co AA | 0.00 | 1 | 2.86 | 0.00 | 0.00 | 0.00 | 0.00 | 1 | 1.58 | 0 | 0 | 0 | 1 | 0.00 | 0.00 | 6.67 | 93.33 |