



UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

DIVISION OF  
CORPORATION FINANCE

June 19, 2020

Via E-mail

Gary Simon, Esq.  
Hughes Hubbard & Reed LLP  
One Battery Park Plaza, 12th Floor  
New York, NY 10004

**Re: Broadway Financial Corporation  
PRRN14A Revised Preliminary Proxy Statement on Schedule 14A  
Filed June 18, 2020 by The Capital Corps, LLC et al.  
File No. 001-39043**

**Amendment No. 5 to Schedule 13D  
Filed May 29, 2020 by The Capital Corps, LLC et al.  
File No. 005-46823**

Dear Mr. Simon:

We have reviewed the above-captioned filings and your response dated June 18, 2020. We have the following comment.

**Amendment No. 5 to Schedule 13D**

1. We have considered your response to comment 8 and are unable to agree with your assertion that the participants have “not engaged in any solicitation.” Please note that a solicitation is not predicated on a party filing a definitive proxy statement. Rather, a solicitation includes the furnishing of a communication to security holders under circumstances reasonably calculated to result in the procurement, withholding or revocation of a proxy. See Rule 14a-1(l)(1)(iii).

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Please direct any questions to me at (202) 551-7951. You may also contact Perry Hindin, Special Counsel, at (202) 551-3444.

Sincerely,

/s/ Joshua Shainess

Joshua Shainess  
Special Counsel  
Office of Mergers and Acquisitions