



DIVISION OF
CORPORATION FINANCE

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

October 27, 2020

Rory Cutaia
Chief Executive Officer
Verb Technology Company, Inc.
2210 Newport Boulevard, Suite 200
Newport Beach, California 92663

**Re: Verb Technology Company, Inc.
Registration Statement on Form S-3
Filed October 20, 2020
File No. 333-249564**

Dear Mr. Cutaia:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Daniel Morris at (202) 551-3314 with any questions.

Sincerely,

Division of Corporation Finance
Office of Trade & Services

cc: Larry Cerutti, Esq.