



DIVISION OF  
CORPORATION FINANCE

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

May 26, 2020

Manny Bettencourt  
Chief Executive Officer  
Zoompass Holdings, Inc.  
2455 Cawthra Rd, Unit 75  
Mississauga, ON LSA3P1, CANADA

**Re: Zoompass Holdings, Inc.**  
**Form 8-K**  
**Filed April 21, 2020**  
**File No. 000-55792**

Dear Mr. Bettencourt:

We have completed our review of your filing. 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.

Sincerely,

Division of Corporation Finance  
Office of Technology

cc: Scott Kline