



UNIVERSITY OF
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STURM COLLEGE OF LAW

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June 12, 2013

Rule-comments@sec.gov

Ms. Elizabeth M. Murphy
Secretary
Securities and Exchange Commission
100 F St. NW
Washington, DC 20549-9303

Re: The JOBS Act

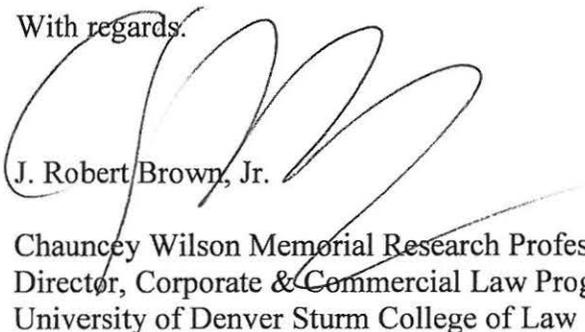
Dear Ms. Murphy:

Students at the University of Denver Sturm College of Law just completed papers on the JOBS Act that were published online by the Law Review at the University of Denver.

The articles address important issues under the JOBS Act, including Regulation A, crowdfunding, general solicitations, the “on ramp” provisions, ownership thresholds for registration under the Exchange Act, state enforcement, and the broker-dealer exemption for portals selling privately placed securities under Rule 506.

We hope you find these articles useful in your administrative endeavors. A list of the articles is included as an appendix to this letter.

With regards,



J. Robert Brown, Jr.

Chauncey Wilson Memorial Research Professor of Law
Director, Corporate & Commercial Law Program
University of Denver Sturm College of Law

The JOBS Act Title V: Raising the Threshold for Registration

Susan Beblavi²

The JOBS Act: Exempting Internet Portals from the Definition of Broker-Dealer

Samuel Hageen³

The JOBS Act: Does the Income Cap Really Protect Investors?

Lina Jasinskaite⁴

The JOBS Act Title I: The “On-Ramp” to IPOs for Emerging Growth Companies

Will McAllister⁵

Regulation A+, the JOBS Act, and Public Offering Lite

David Rodman⁶

Crowdfunding and State Level Securities Fraud Enforcement under the JOBS Act

Michael W. Shumate⁷

The JOBS Act and the Elimination of the Ban on General Solicitations

Erica Siepman⁸

Crowdfunding and Using Net Worth to Determine Investment Limits

Lindsay Anderson Smith⁹

¹ The entire issue is here: <http://www.denverlawreview.org/jobs-act-feature>

² http://www.denverlawreview.org/storage/online-article-pdfs/2013/jobs-act-feature/Beblavi_Final_Formatted.pdf

³ <http://www.denverlawreview.org/online-articles/2013/4/27/the-jobs-act-exempting-internet-portals-from-the-definition.html>

⁴ <http://www.denverlawreview.org/online-articles/2013/4/27/the-jobs-act-does-the-income-cap-really-protect-investors.html>

⁵ <http://www.denverlawreview.org/online-articles/2013/4/27/title-i-of-the-jobs-act-the-on-ramp-to-ipos-for-emerging-gro.html>

⁶ <http://www.denverlawreview.org/online-articles/2013/4/27/regulation-a-the-jobs-act-and-public-offering-lite.html>

⁷ <http://www.denverlawreview.org/online-articles/2013/4/27/crowdfunding-and-state-level-securities-fraud-enforcement-un.html>

⁸ <http://www.denverlawreview.org/online-articles/2013/4/27/the-jumpstart-our-business-startups-act-and-the-elimination.html>

⁹ <http://www.denverlawreview.org/online-articles/2013/4/27/crowdfunding-and-using-net-worth-to-determine-investment-lim.html>