

MEMORANDUM

FROM: Sebastian Gomez Abero
Special Counsel
Office of Chief Counsel, Division of Corporation Finance
U.S. Securities and Exchange Commission

RE: Meeting with representatives of The InVentures Group, Inc.

DATE: January 31, 2013

On January 31, 2013, Commission staff met with representatives of The InVentures Group, Inc. to discuss issues regarding the implementation of Title III of the Jumpstart Our Business Startups Act.

The following Commission representatives were present: Joseph Furey, Leila Bham, Timothy White, Daniel Gien, Shaheen Zuver and Wonju Sul from the Division of Trading and Markets; Lillian Brown and Sebastian Gomez Abero from the Division of Corporation Finance; and Scott Banguess, Vladimir Ivanov, Ivan Ivanov and Audra Boone from the Division of Risk, Strategy, and Financial Innovation.

The following representatives of The InVentures Group, Inc. were present: Bob Carbone, Keith Blakely and Daniel McAvoy (Nixon Peabody LLP).