May 1, 2020

Vanessa Countryman Secretary Securities and Exchange Commission 100 F Street, NE Washington, DC 20549-1090

Re: <u>Amending the "Accredited Investor" Definition, Rel. Nos. 33–10734 and 34–87784</u>; File No. S7–25–191

<u>Facilitating Capital Formation and Expanding Investment Opportunities by Improving Access to Capital in Private Markets, Rel. Nos. 33-10763 and 34-88321; File No. S7-05-202</u>

Dear Secretary Countryman:

We write to provide comments on the Securities and Exchange Commission's recent proposals regarding Capital Formation and the Accredited Investor definition. President Barack Obama signing the <u>Jumpstart our Business Startups (JOBS) Act</u> into law opened new opportunities for entrepreneurs and investors across the United States. This is especially true for African American, Latinx, and other communities who have, historically, not had equitable access to capital or investment opportunities.

Racism, sexism, and other biases have contributed greatly to socio-economic inequality. So have regulations and standards of practice that – intentionally or not – limit opportunity. The negative impact of these standards is more acute for women and communities of color. However, the sweeping inequality in the Commission's regulation of who can participate in private capital markets – especially prior to the signing of the JOBS Act – means that no zipcode or culture in the United States was unaffected. Everyone stood to gain.

Today, everyone stands to gain from continued progress towards equitable access to private capital markets; with appropriate investor protection. The impact of the abovementioned Proposals on communities of color will be highlighted in our comments. However, the changes we champion will support any person with a desire to build something great, through deploying capital or their own labor.

Summary

Building on the Commission's <u>Concept Release on Harmonization of Securities Offerings</u>, the <u>Capital Formation Proposal</u> shows progress towards Regulation Crowdfunding maturing and reaching full potential for entrepreneurs and investors.

The proposed increases in annual offering limits for issuers and changes to investment limits for accredited and non-accredited investors are positive. The ability to "test the waters" makes it easier for

entrepreneurs to plan fundraising. Improvements are still needed in several areas, but we believe these proposed changes represent a step in the right direction.

The <u>Accredited Investor Definition Proposal</u> shows little progress towards removing the "binary¹" approach Commission Chairman Jay Clayton often refers to when discussing the need to modernize rules governing who can participate in private capital markets. While the letter of Chairman Clayton's statement is addressed, the spirit – as we understand it – is not. The principal example of this deficiency is that the current income and wealth standards are left in place.

Yes, expanding qualification to holders of certain professional certifications does – technically – remove the "binary" nature of the current Rule. However, the small size of and lack of diversity in the population that has or is likely to get one of the certifications mentioned in the Proposal means that the spirit of the Chairman's statement is not addressed.

Our broader thoughts on both Proposals are included below, along with quotes from a Twitter Chat about the Proposals.

Proposals and Recommendations

On April 9, 2020 Brandon Andrews hosted an online conversation to discuss the Proposals. The conversation entitled <u>"#TheInvestment"</u> was held on Twitter and engaged a large number of entrepreneurs, accredited and non-accredited investors, and others interested in crowdfunding, crowdinvesting and the Commission's new Proposals.

Included below are annotated Tweets from the conversation that articulate our thoughts on Regulation Crowdfunding and the previously mentioned Proposals. A recap of the conversation, including over 150 Tweets is enclosed with this letter.



Q2 A lot of startups are looking for funding options now. For entrepreneurs who have used Regulation Crowdfunding why was it the right option for your business? #theinvestment

¹ Jay Clayton, SEC Proposes to Update Accredited Investor Definition to Increase Access to Investments https://www.sec.gov/news/press-release/2019-265



Replying to @brandontalk

Q2: Reg CF was great for us because we really wanted to open up @PopComSaaS to our friends/family/network and many were not accredited. We weren't ready for a series A but past seed so it was a great bridge for us #TheInvestment



Replying to @brandontalk

A2 it made a lot of sense for us because the people always understood the problem we were solving. Investors havent always "got it." Also, it was a Great way to activate and Grow our community during the campaign #TheInvestment



A2. Equity crowdfunding helped me bring more people to the table of early stage startup investing. I think that startups will truly impact generational wealth and my campaign (via @joinrepublic) helped me educate people and share our experience with them.

#theinvestment

Regulation Crowdfunding has been an important step for many founders, allowing them to engage personal and customer networks in the next phase of business growth. Creating the regulatory structure to support entrepreneurs offering securities to larger groups of non-accredited friends, family, and fans through authorized portals has forged a new connection between businesses and the people that often know them best.

In our experience, the opportunities presented by more equitable access to private capital markets are education, transformation, capital, and wealth building. It begins with education, with issuers educating themselves and in turn educating investors (accredited and non-accredited) through marketing strategies that drive successful campaigns.



Q3 How did you set up your Regulation Crowdfunding campaign? #TheInvestment



Replying to @brandontalk

A3: we spent a lot of time creating videos, demos, and graphics to explain the product, team, and vision. I hosted bi-weekly #AMA session live on social media and posted frequent updates to our @StartEngineLA page #TheInvestment



Replying to @brandontalk

A3: filing and approval for the first Reg CF took a long time, 6 months, and that gave us time to plan and prepare a solid marketing campaign and start to generate warm leads "test the waters" before we launched #thelnvestment

Regulation Crowdfunding gives entrepreneurs with solid business fundamentals the opportunity to leverage community building and marketing skills to build successful fundraising campaigns. Entrepreneurs of color have never lacked the grit necessary to build a business, but the relationships and capital have not always been in reach. Education through socialization of the concept transforms entrepreneurs into issuers and consumers into investors; necessary steps to begin the flow of capital.



A3. I approached our campaign from a very scientific and measured approach. We had a content calendar, timed out our press releases, and really thought through touching and engaging potential investors 7-10 times. A lot of our playbook came from this case study. #TheInvestment



Each founder's approach to a Regulation Crowdfunding campaign is different. However, planning, building a network, marketing effectively, and "touching" potential investors several times during a campaign have led to success.



Q6 Let's talk about the new @SEC_News Capital Formation proposal. What do you like about it? What don't you like about it? #TheInvestment

Take a look at the proposal here - sec.gov/news/press-rel...



Replying to @brandontalk and @SEC_News

A6 I appreciate the SEC revisiting the investment limits on the Reg CF, we left hundreds of thousands/maybe millions on the table in 2019 after we passed \$1.07M and had to stop accepting investments. As a founder I cringed, that was rough. #theinvestment

Regulation Crowdfunding campaigns that reach the current \$1.07M limit leave money on the table and break their momentum when they hit the ceiling. Some founders looking to raise larger amounts decline Regulation Crowdfunding because of the current \$1.07M limit.

Startups and small businesses are incredibly important to local communities, larger ecosystems, and the broader economy. New business formation is the catalyst for economic dynamism that drives activity and distributes capital throughout local, national, and the global economy.

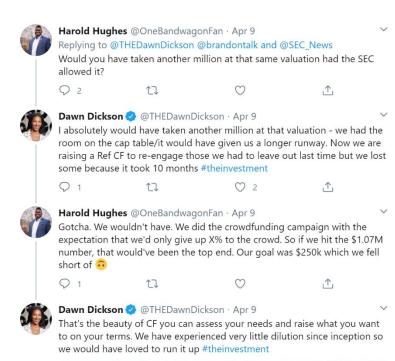
The impact of business formation in communities of color is even more significant. This is particularly true for businesses that scale. For example, according to the Survey of Business Owners there are about 2.6M African American owned businesses in the United States.² Only 109,000 (4%) of these businesses have employees.³ The number of Black entrepreneurs with employees in the United States is smaller than the work day population of Ward 6 in Washington, DC where the Commission's office is located.⁴

When even one Black-owned business with the potential to scale, hire, and generate wealth has its momentum stopped the opportunity cost to the community is devastating.

² Survey of Business Owners Facts, https://www.mbda.gov/sites/mbda.gov/files/migrated/files-attachments/SBO Facts BOB.pdf

³ Survey of Business Owners Facts, https://www.mbda.gov/sites/mbda.gov/files/migrated/files-attachments/SBO Facts BOB.pdf

⁴ Population of Ward 6 in Washington, DC is 94,558. https://censusreporter.org/profiles/61000US11006-ward-6-dc/ Current population estimate for Washington, DC is 705,749. https://www.census.gov/quickfacts/DC During the workday the population of Washington, DC grows to over 1 million, an increase in 294,251. If evenly distributed across 8 Wards each Ward would increase by 36,781 bringing the work day population of Ward 6 to 131,339.







A6 I like that in the new proposal, the amount that a startup can raise is increased. That said, I think there is still a lot of work that needs to be done around the clarification of "accredited investor". I'd like to see the income thresholds lowered. #TheInvestment



Replying to @brandontalk and @SEC_News

A6 These changes are more important now than they've ever been. Most excited about the proposal to allow founders to test the waters (TTW) #TheInvestment

The "Testing the waters" provision in the Capital Formation Proposal is particularly helpful to many founders considering the range of options for raising capital. Moreover, clarifying "solicitation" guidelines for demo days and other public pitch opportunities removes a consistent concern from the minds of entrepreneurs.



We see increasing the amount of decentralized capital as healthy for the broader entrepreneurial ecosystem.





Replying to @brandontalk

A7: I'm not sure it's going to matter much to the "New Majority" founders. It doesn't take long to count the number of people from this community who have raised between \$1 and \$5 million on an approved regulation platform. #TheInvestment

As the <u>rate of entrepreneurship has declined</u>⁵ in the United States over the past 30 years, entrepreneurial activity in African American and Latinx communities remained high.⁶ This fact coupled with the \$2.8T in combined consumer buying power in African American and Latinx communities⁷ means there is incredible potential for "new majority" businesses to educate, transform, and access capital through Regulation Crowdfunding. More education and socialization are needed for this to happen at scale.

Wealth building is the culmination of the education, transformation, and capital opportunities unlocked by equitable access to private capital markets. As Brandon Andrews shared at the Commission's <u>37th</u> <u>Government-Business Forum on Small Business Capital Formation</u>: "...the wealth gap is a real thing, and if we don't change the trajectory for communities of color, in particular, but also for women, then these communities are going to be left behind permanently."

The most compelling Regulation Crowdfunding campaigns educate large groups of potential investors. Through education, consumers see themselves as investors; a new concept for many non-accredited investors in communities of color. This transformation will pay lifelong dividends as some will look for future opportunities to build wealth and/or start businesses themselves.

Education and wealth building are inextricably linked for both issuers and potential investors. Investors can weigh the risk if given the chance.

⁵ Brookings, Declining Business Dynamism in the United States: A Look at States and Metros https://www.brookings.edu/research/declining-business-dynamism-in-the-united-states-a-look-at-states-and-metros/

⁶ Kauffman, Rate of New Entrepreneurs https://indicators.kauffman.org/indicator/rate-of-new-entrepreneurs

⁷ According to Nielsen African American consumer buying power was 1.3T in 2018 Latinx consumer buying power was 1.5T https://www.nielsen.com/us/en/insights/report/2019/its-in-the-bag-black-consumer-path-to-purchase/
https://www.nielsen.com/wp-content/uploads/sites/3/2019/09/nielsen-2019-latinx-DIS-report.pdf

⁸ Moguldum, Venture Capital is not designed to be fair https://moguldom.com/189739/venture-capital-is-not-designed-to-be-fair-melissa-bradley-managing-partner-of-1863-ventures/

⁹ Brandon Andrews, 37th Government Business Forum on Small Business Capital Formation. Page 148 https://www.sec.gov/files/2018-Forum-transcript.pdf



Replying to @brandontalk

Here's another 1 on how equity crowdfunding's power to close the racial wealth gap, huffpost.com/entry/crowdfun...

#TheInvestment



Crowdfunding's Power To Close The Racial Wealth Gap
Today, Monday, May 16th, 2016 marks the beginning of a new era in American
capital formation. Title III of the historic JOBS Act signed by President Bara...

& huffpost.com



Brandon Andrews @brandontalk · Apr 9

Q8 Lot's of mentions of the Accredited Investor definition. Let's talk about the latest @SEC_News Accredited Investor Proposal. It would leave the current income and wealth qualification standards in place. Thoughts on this? #TheInvestment



Replying to @brandontalk and @SEC_News

A8 Like the UK, it's time for America to update its accredited investor rules. Although there are over 600,000+ Black people that have a \$1M net worth in the US; with most that net worth in personal residences, Dodd Frank excludes them from meeting the rule. #TheInvestment

The current income and wealth standards that determine who can narticinate in

The current income and wealth standards that determine who can participate in private capital markets shut out even many "wealthy" Americans from investing in founders from their communities.



Replying to @brandontalk and @SEC_News

A8 I've had people want to invest more money than what the SEC allows and they ask when I will open another round again. I also think many people have money when they have it and need to invest when they can. #theinvestment



Replying to @brandontalk and @SEC_News

A8 I've had several people want to Invest larger amounts and they were told they could not because of the income requirements- I don't think the SEC should tell people how much of their own money they can invest or spend #theinvestment



Inequality permeates the income and wealth standards in the current Accredited Investor Definition. The fact that the Commission's Accredited Investor Proposal does not propose changes to the wealth and/or income standards in the current Accredited Investor Definition is as glaring an omission as the fact that Registered Securities Representatives were not already considered "accredited" by the Commission.

The deficit framing inherent in the current Accredited Investor Definition focuses on what individuals do not have instead of the non-financial assets they do have. A focus on what a range of individuals do have and how their assets coupled with education prepare them to invest may chart a path towards more equitable access to capital markets.

The Commission should be as intentional about making access to private capital markets equitable as it has been about restricting access. This approach should be evidence-based; tracking the impact on communities that have historically had less access to capital and investment opportunities. Data is needed to do this. Too often, that data is not available.

Expanding the Accredited Investor Definition to include holders of certain professional certifications is a small step forward. However, FINRA does not include demographic data in its annual industry snapshot. Yes, including over 700,000 Registered Securities Representatives and State Registered Investment Advisor Representatives will expand the pool of Accredited Investors. Without demographic data, it is difficult to determine how equitable this expansion will be. Moreover, this complicates the needed task of setting goals and ensuring accountability for women and communities of color being positioned to take full advantage of any expansion.

The CFP Board Center for Financial Planning reports that 4% of Certified Financial Planners are African American or Latinx. This 4% number was reached after record 12% growth in the number of African American and Latinx CFPs in 2019.¹²

CFPs and Registered Securities Representatives do not fully overlap, but the population of financial professionals is not diverse. However small, we hope the Commission will fund a data initiative to collect demographic and other relevant data to measure the impact of the Accredited Investor and Capital Formation Proposals, and empower an intentional and evidence-based approach to creating equitable access to private capital markets.



Q9 What's one thing @SEC_News could do – immediately – to make fundraising online easier for entrepreneurs during the COVID-19 Pandemic? #TheInvestment



Replying to @brandontalk and @SEC_News

I don't know if this is an SEC issue or not but the fees for audits and filing paperwork are excessive over \$120,000 for reg A+ seems predatory to allow them to charge start ups these fees #theinvestment

https://www.finra.org/sites/default/files/2019%20Industry%20Snapshot.pdf

¹⁰ FINRA, 2019 FINRA Industry Snapshot

¹¹ Securities and Exchange Commission, Amending the "Accredited Investor" Definition. Table 2 https://www.sec.gov/rules/proposed/2019/33-10734.pdf

¹² Financial Planning, Record Growth and Black and Latino CFPs; status quo for women. https://www.financial-planning.com/news/record-growth-for-african-american-and-latino-financial-advisors-cfp-board



Replying to @brandontalk and @SEC_News

A9 Relax the Form C process. It is painful and feels nuanced. Further, there is need for legal review needed at multiple stages of the process and that should be streamlined. #TheInvestment

Finally, as the world responds to the COVID-19 Pandemic and entrepreneurs look for more capital options it may be good for the Commission to consider fast track and/or smaller dollar opportunities for entrepreneurs.

Conclusion

We see the opportunities presented by more equitable access to private capital markets as education, transformation, capital, and wealth building. Education leads to transformation (individuals seeing themselves as investors), this transformation increases the flow of capital, and opens up wealth building opportunities for issuers and investors.

The Capital Formation Proposal is a good working document that moves the regulatory structure closer to a place of equity. We believe the current Proposal coupled with our recommendations will accelerate that progress. The Accredited Investor Proposal does the bare minimum in providing meaningful changes to the Accredited Investor Definition. It leaves in place a structure that reinforces opportunity for the wealthy and restricts opportunity for everyone else, and does not provide a clear pathway to more equitable access.

We recommend the following to make access to private capital markets more equitable:

- Approve the proposed amendments in the Capital Formation Proposal
- Review the legal, manpower, and other costs of filing requirements for Regulation CF and A+ offerings, and how these costs impact entrepreneurs of color exploring exempt offerings.
- Prioritize education for any Commission initiatives; especially those involving non-accredited investors. Provide the budget and/or other resources necessary to offer culturally competent information to the full breadth and depth of the Commission's non-accredited constituents.
- Evolve from deficit framing to asset framing when considering non-accredited investors.
- Present a pathway to remove the sweeping inequality in the current Accredited Investor Definition through asset framing, education, and further expansion of qualification by profession and/or certification.
- Fund a data initiative to collect demographic and other relevant data to empower an intentional and evidence-based approach to creating equitable access to private capital markets.
- Explore options for fast-tracked offerings of securities through private placements in response to emergency market conditions.

We commend the Commission for creating the regulatory structure supporting entrepreneurs offering securities to larger groups of non-accredited investors. Furthermore, the Concept Release on

Harmonization of Securities Offerings and subsequent proposals, and events like "Reaching New Heights" at Morehouse College show that the Commission is making progress towards equitable access to private capital markets. We look forward to working with the Commission to accelerate this progress as each step towards equity opens opportunity for communities across America.

Signed,	
Brandon Andrews	Harold Hughes
CEO, The Inexorable	CEO, BandwagonFanClub
Mike Brown	Obi Omile
CEO, Win-Win	CEO, theCut
Dawn Dickson	Rodney Sampson
CEO, PopCom	CEO, OHUB
	Nonresident Senior Fellow, Brookings Institution
Ofo Ezeugwu	
CEO, WhoseYourLandlord (WYL.co)	Kobi Wu
	CEO, VisuWall Technologies

Enclosure

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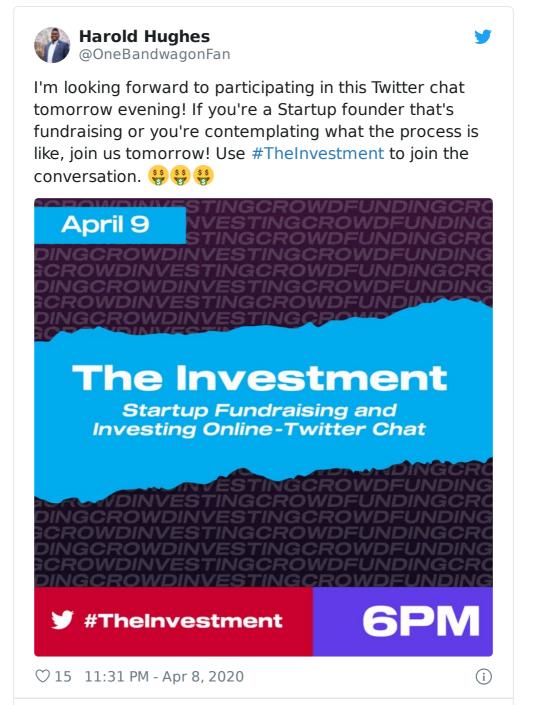
The Investment

Startup Fundraising and Investing Online-Twitter Chat

#TheInvestment Twitter Chat

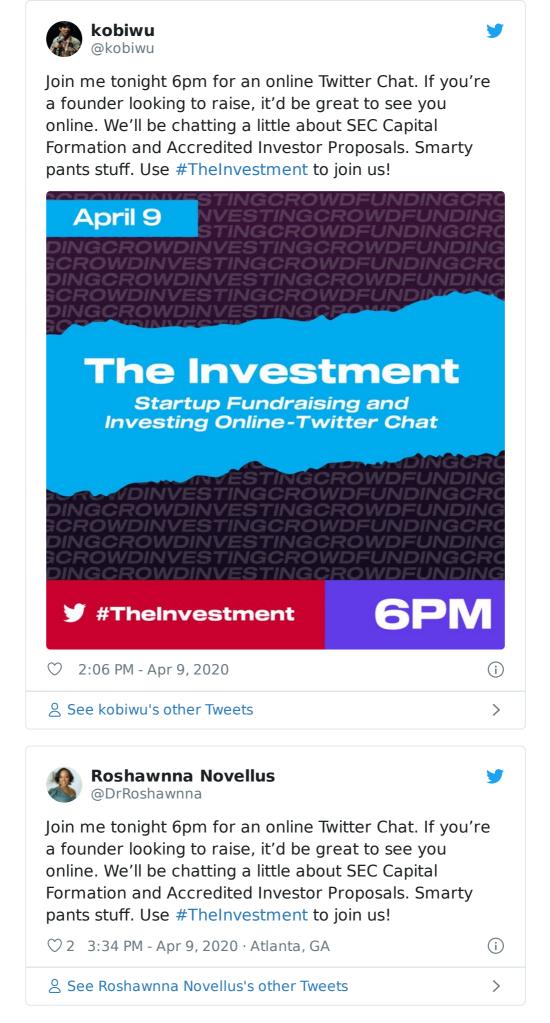
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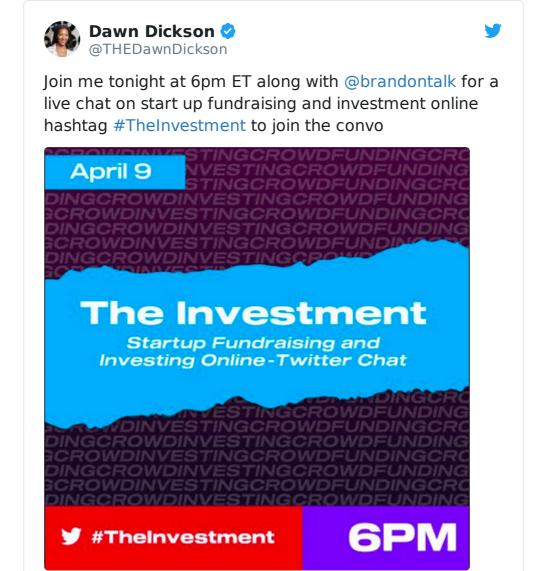
Discussing startup fundraising and investing online and new proposals from the US Security and Exchange Commission addressing Capital Formation and the Accredited Investor Definition



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See Harold Hughes's other Tweets



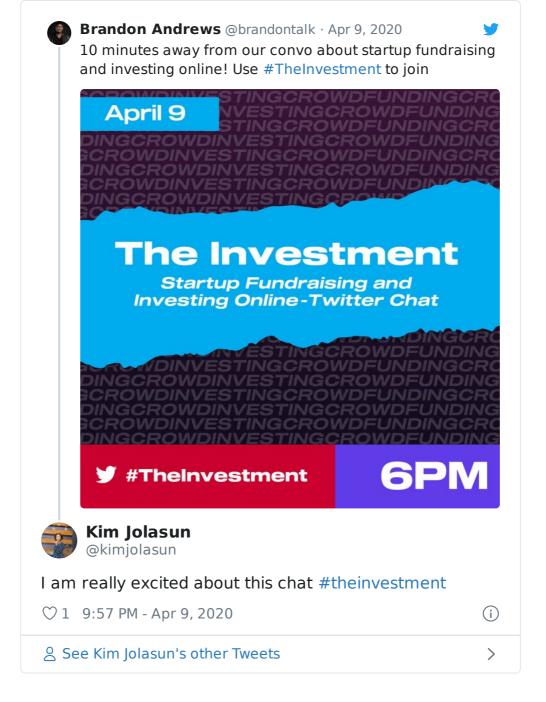


(i)

See Dawn Dickson's other Tweets







Kickoff!



See Brandon Andrews's other Tweets



Brandon Andrews @brandontalk · Apr 9, 2020



Excited to kick off our convo about startup fundraising and investing online! Use #TheInvestment to follow along and join the convo.





I'm here #TheInvestment

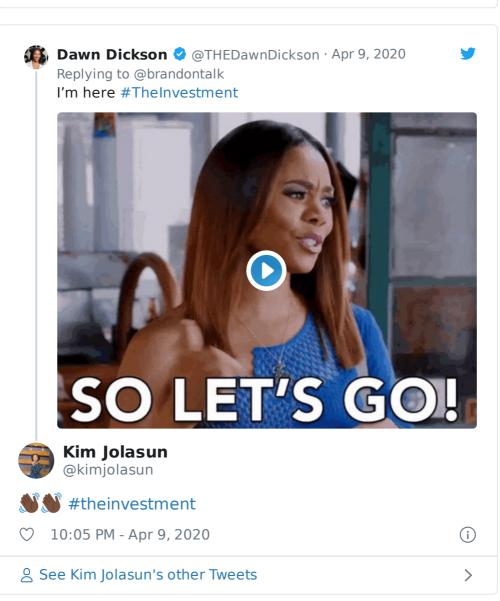


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See Dawn Dickson's other Tweets







Brandon Andrews @brandontalk · Apr 9, 2020



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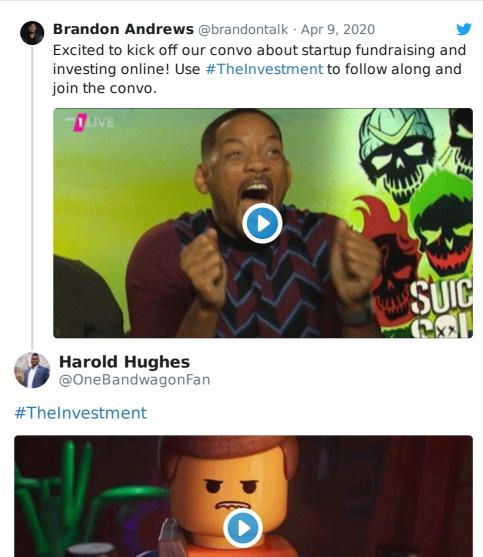


Up in the chat! #TheInvestment.

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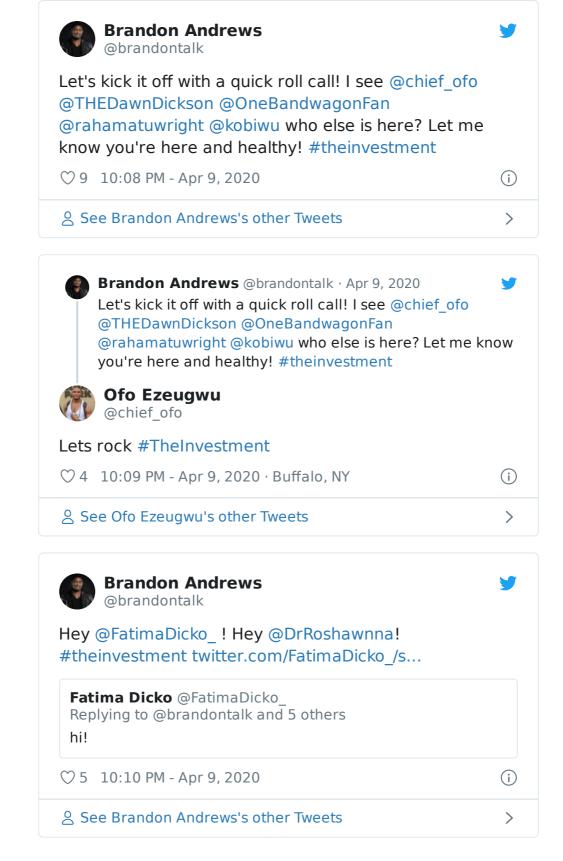
See kobiwu's other Tweets











Q1 - Experience with Regulation Crowdfunding











Brandon Andrews @brandontalk · Apr 9, 2020



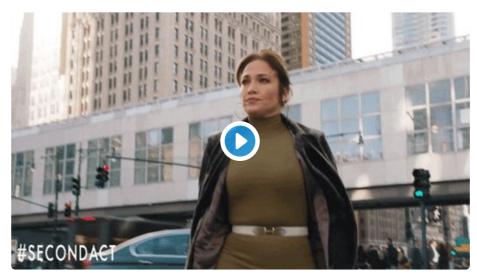
Excited to kick off our convo about startup fundraising and investing online! Use #TheInvestment to follow along and join the convo.





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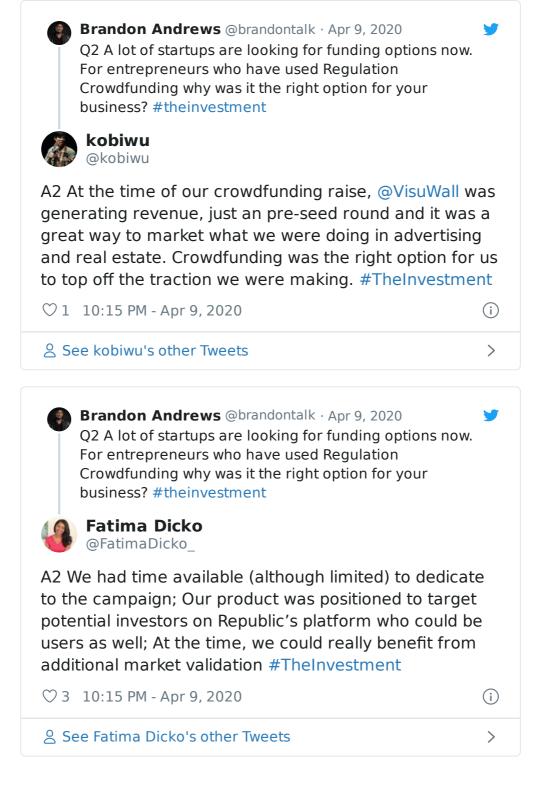
I'm here! #TheInvestment

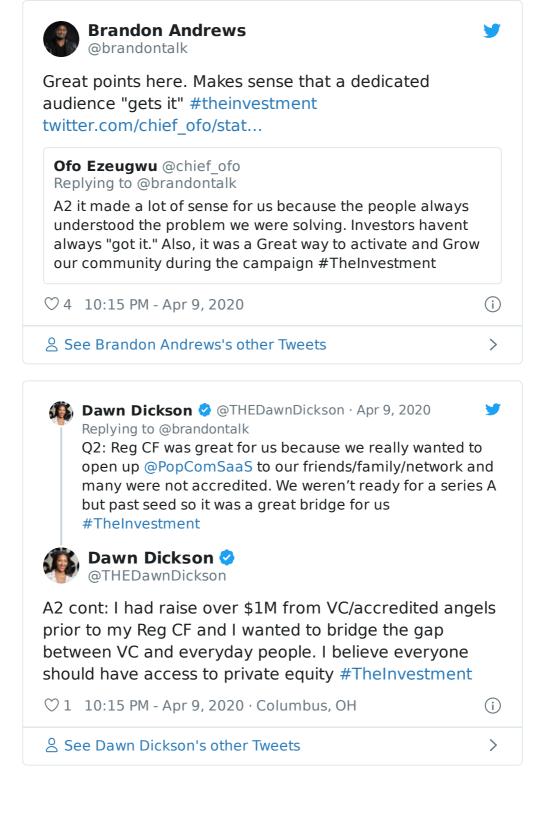


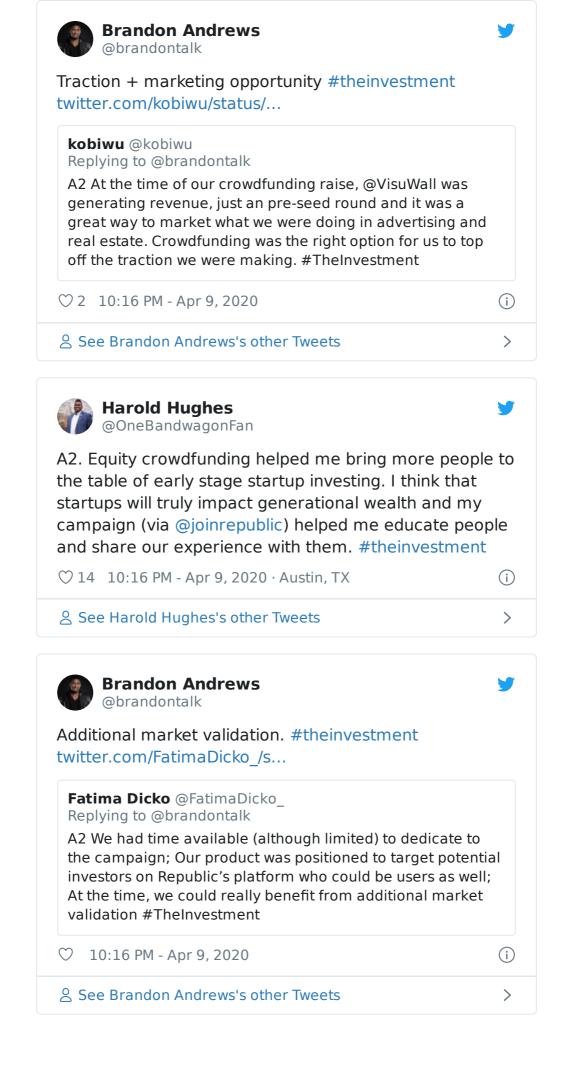
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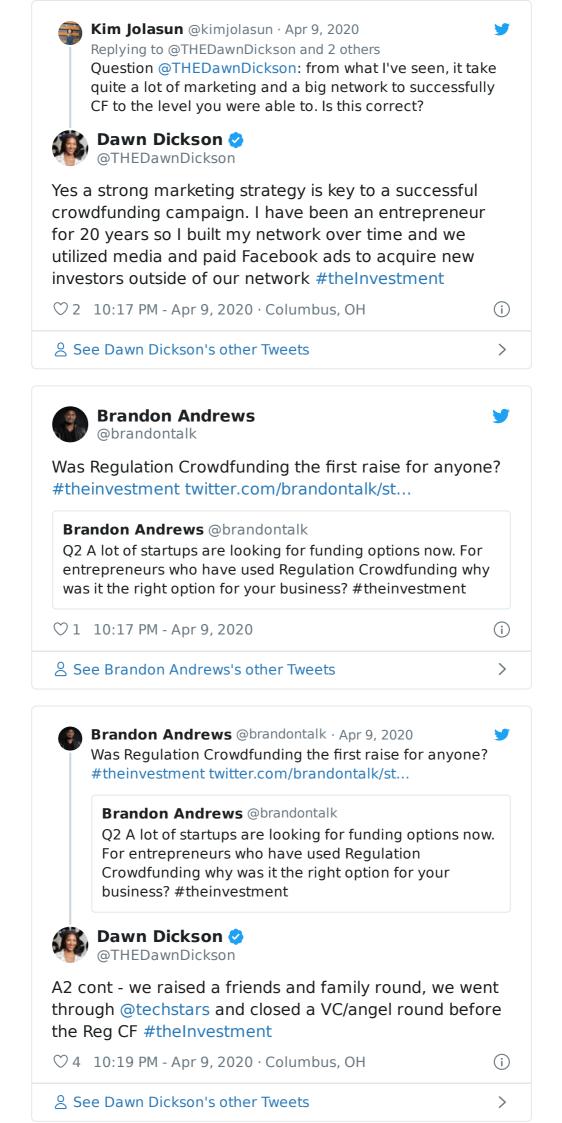




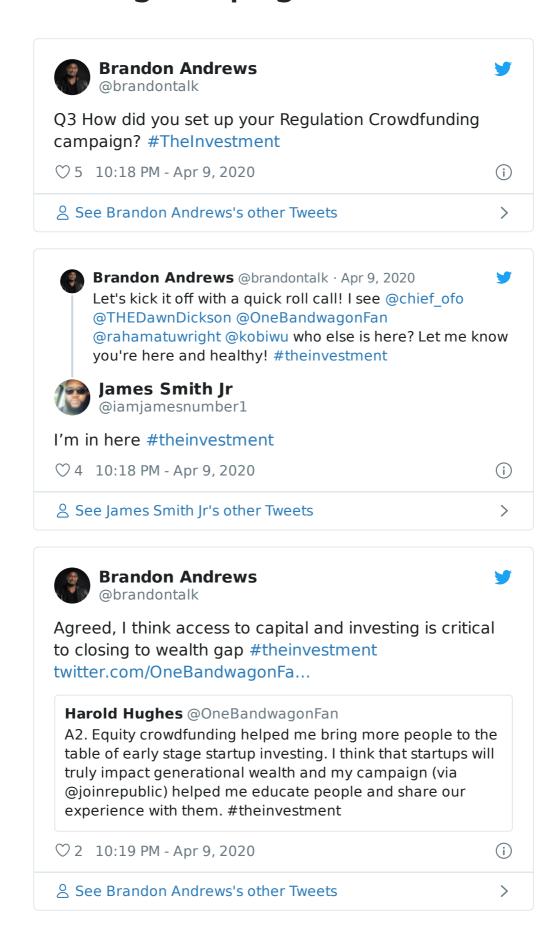


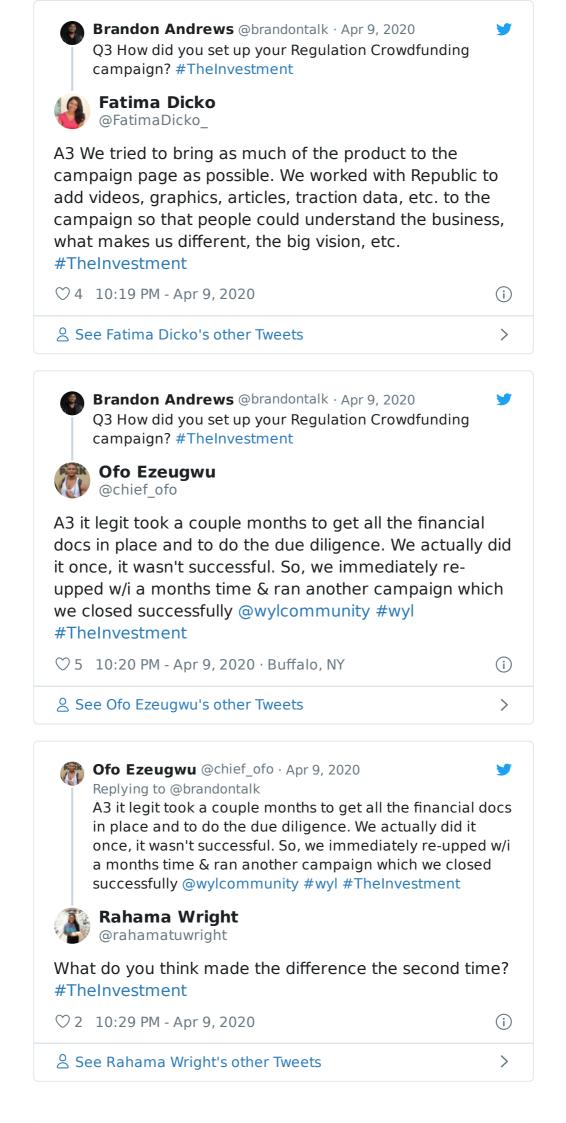


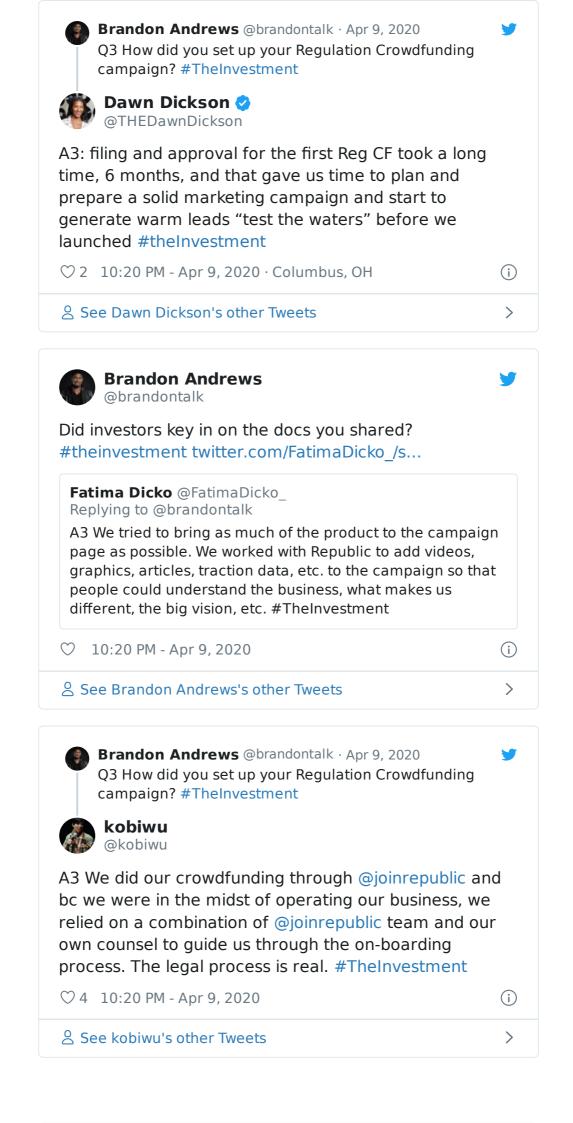


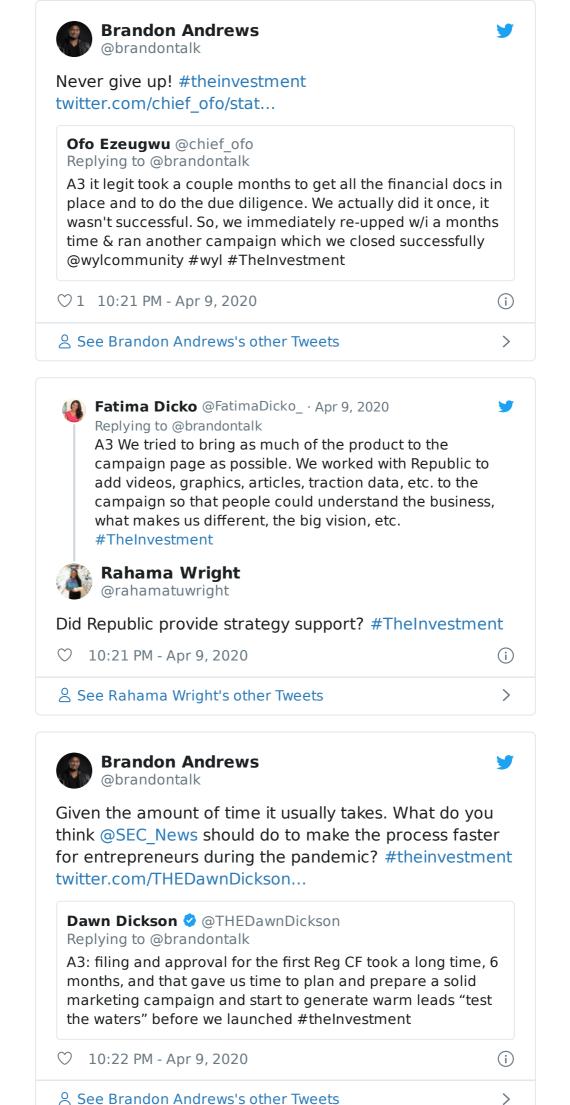


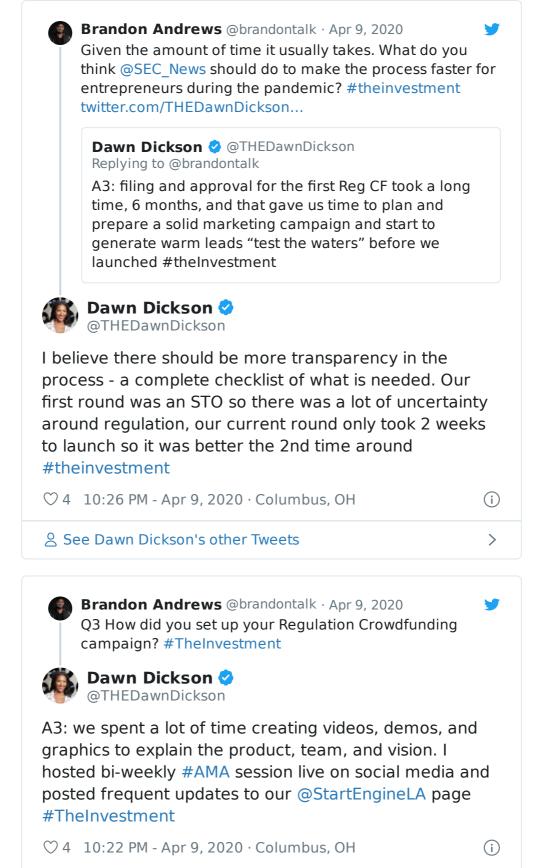
Q3 How did you set up your Regulation Crowdfunding Campaign?











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See Dawn Dickson's other Tweets.



A3: Most of the founders that we helped simply didn't want to prioritize putting all of the documents together as required by the SEC and FINRA. We spent a lot of time helping them through their Form C process as well as other requirements. #theinvestment

○ 4 10:23 PM - Apr 9, 2020



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See Roshawnna Novellus's other Tweets





A3. I approached our campaign from a very scientific and measured approach. We had a content calendar, timed out our press releases, and really thought through touching and engaging potential investors 7-10 times. A lot of our playbook came from this case study. #TheInvestment





Contents lists available at ScienceDirect

Journal of Business Venturing



ISEVIED

The dynamics of crowdfunding: An exploratory study * . * * *

Ethan Mollick*

The Wharton School of the University of Pennsylvania, United States

ARTICLE INFO

Article history:
Received 22 February 2013
Received in revised form 26 June 2013
Accepted 27 June 2013
Available online 13 August 2013

Field Editor: Gavin Cassar

Reywords: Crowdfunding New ventures Entrepreneurial finance Startups Geography

ABSTRACT

Crowdfunding allows founders of for-profit, artistic, and cultural ventures to fund their efforts by drawing on relatively small contributions from a relatively large number of individuals using the internet, without standard financial intermediaries. Drawing on a dataset of over 48,500 projects with combined funding over \$237 Mt. his paper offers a description of the underlying dynamics of success and failure among crowdfunded ventures. It suggests that personal networks and underlying project quality are associated with the success of crowdfunding efforts, and that geography is related to both the type of projects proposed and successful fundraising. Finally, I find that the vast majority of founders seem to fulfill their obligations to funders, but that over 75% feliver products later than expected, with the degree of delay predicted by the level and amount of funding a project receives. These results offer insight into the emerging phenomenon of crowdfunding, and also shed light more generally on the ways that the actions of founders may affect their ability to receive entrepreneurial functions.

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1. Executive summary

Crowdfunding is a novel method for funding a variety of new ventures, allowing individual founders of for-profit, cultural, or social projects to request funding from many individuals, often in return for future products or equity. Crowdfunding projects can range greatly in both goal and magnitude, from small artistic projects to entrepreneurs seeking hundreds of thousands of dollars in seed capital as an alternative to traditional venture capital investment (Schwienbacher and Larralde, 2010). Despite over a billion dollars spent by millions of individual crowdfunding backers, and large-scale action by the US Congress to encourage crowdfunding as a source of capital for new ventures, even basic academic knowledge of the dynimics of crowdfunding is lacking, outside of the still-uncommon analysis of particular crowdfunding efforts (Agrawal et al., 2010; Burtch et al., 2011). For example, scholars know very little about the dynamics of successful crowdfunding, as well as the general distribution and use of crowdfunding mechanisms. We do not know whether crowdfunding efforts reinforce or contradict existing theories about how ventures raise capital and achieve success. There is also uncertainty about the long-term implications of crowdfunding, such as

○ 10 10:24 PM - Apr 9, 2020 · Austin, TX







Great resource from @OneBandwagonFan! Don't miss this #theinvestment twitter.com/OneBandwagonFa...

Harold Hughes @OneBandwagonFan

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Journal of Business Venturing 29 (2014) 1-16



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The dynamics of crowdfunding: An exploratory study **. ***

Ethan Mollick*

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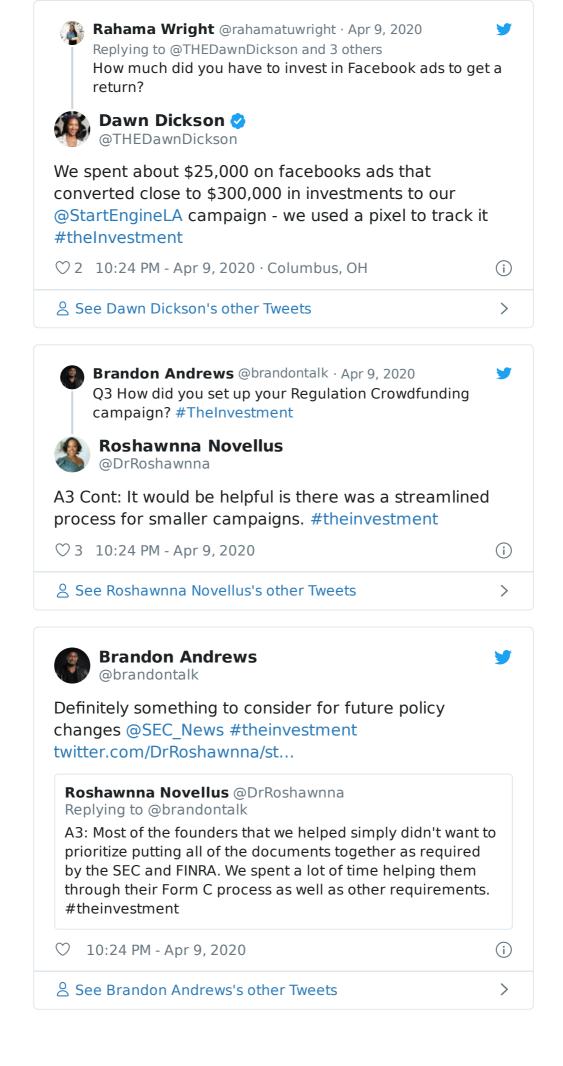
1. Executive summary

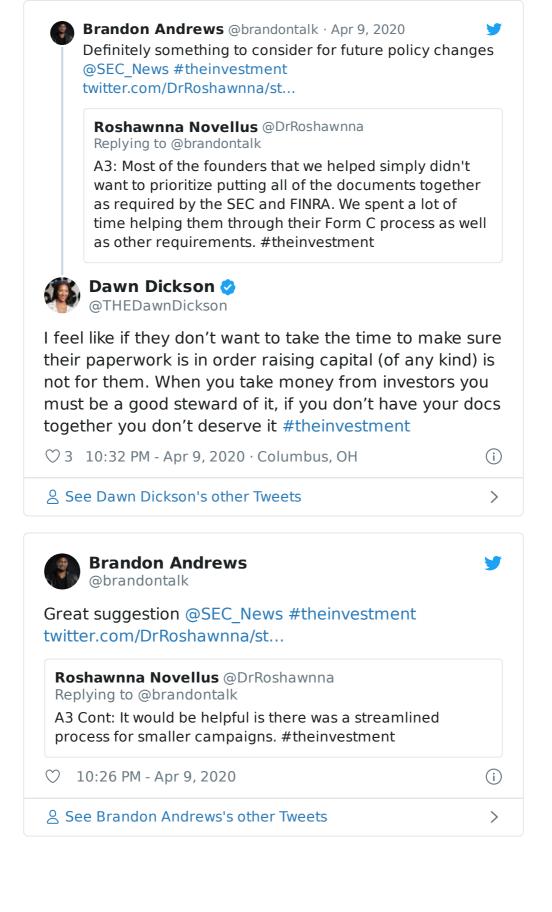
Crowdfunding is a novel method for funding a variety of new ventures, allowing individual founders of for-profit, cultural, or social projects to request funding from many individuals, often in return for future products or equity. Crowdfunding projects can range greatly in both goal and magnitude, from small artistic projects to entrepreneurs seeking hundreds of thousands of dollars in seed capital as an alternative to traditional venture capital investment (Schwienbacher and Larralde, 2010). Despite over a billion dollars spent by millions of individual crowdfunding backers, and large-scale action by the US Congress to encourage crowdfunding as a source of capital for new ventures, even basic academic knowledge of the dynamics of crowdfunding is lacking, outside of the still-uncommon analysis of particular crowdfunding efforts (Agrawal et al., 2010; Burtch et al., 2011). For example, scholars know very little about the dynamics of successful crowdfunding, as well as the general distribution and use of crowdfunding mechanisms. We do not know whether crowdfunding efforts reinforce or contradict existing theories about how ventures raise capital and achieve success. There is also uncertainty about the long-term implications of crowdfunding, such as

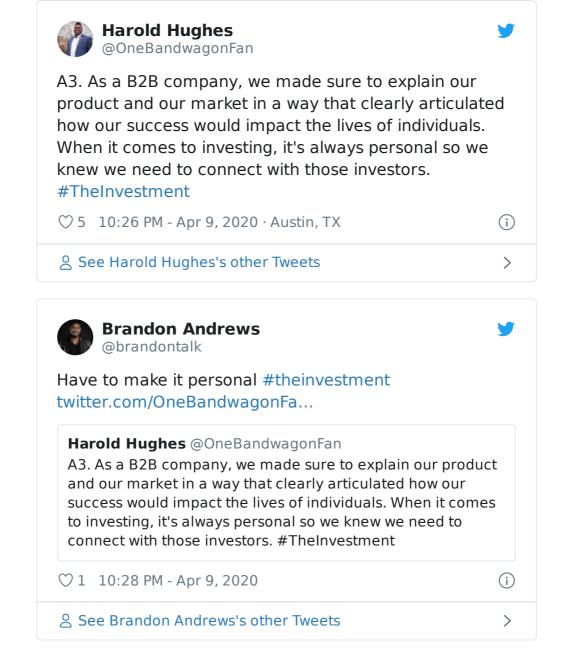
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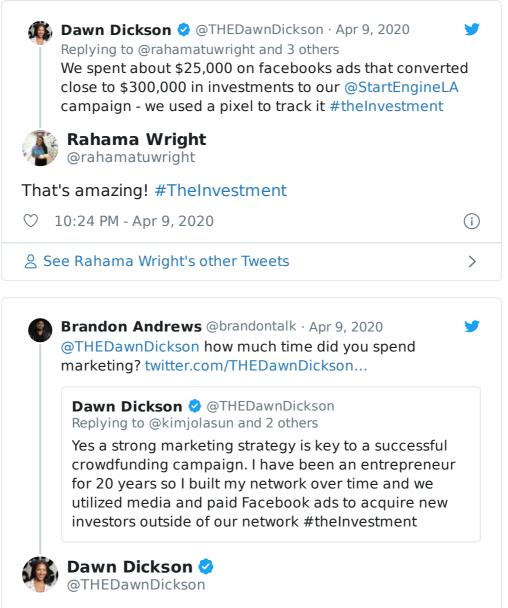






Q4 - Advice for founders considering Regulation Crowdfunding?





I spend about 4 hours a day or more engaging with investors across our platforms and preparing content. My background is marketing so I oversee that and outsourced our ads management to a firm. For this campaign we manage ads in house #theInvestment

○ 2 10:25 PM - Apr 9, 2020 · Columbus, OH
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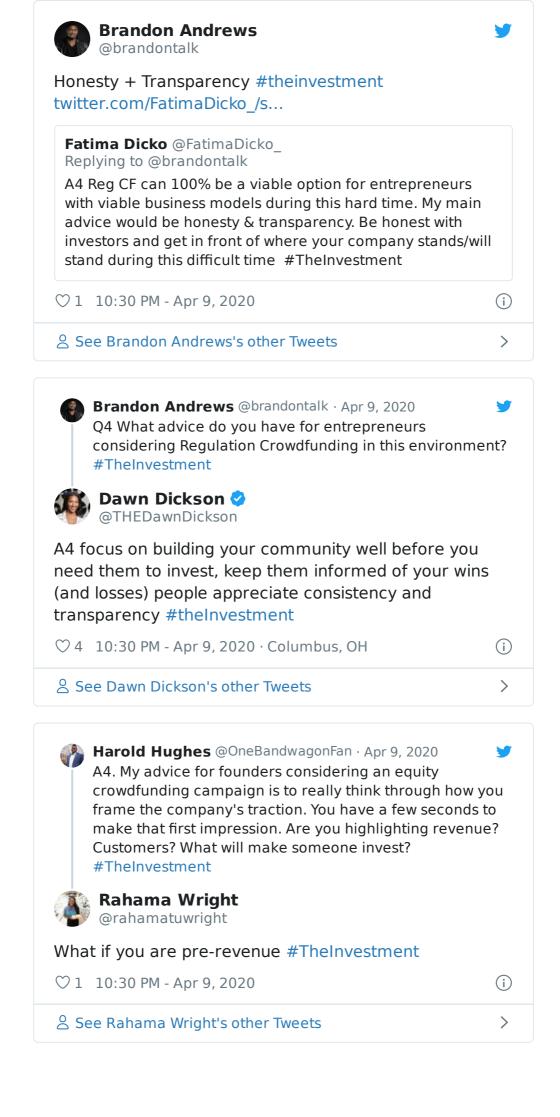








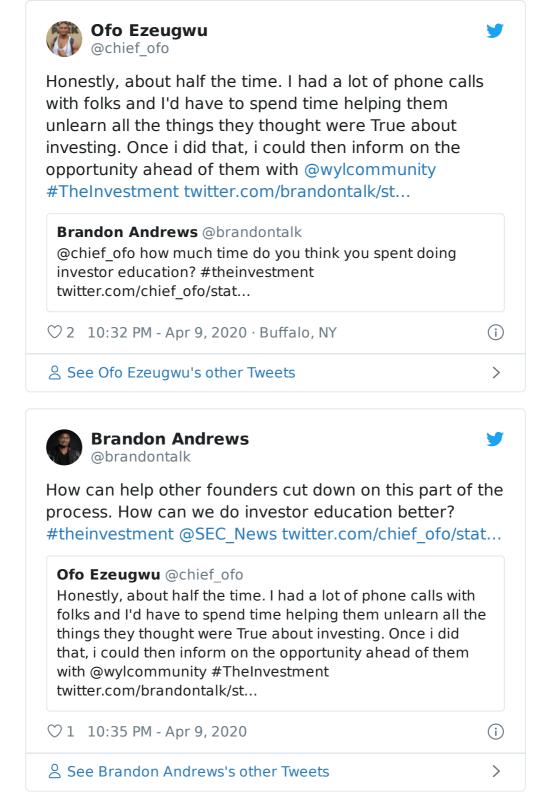


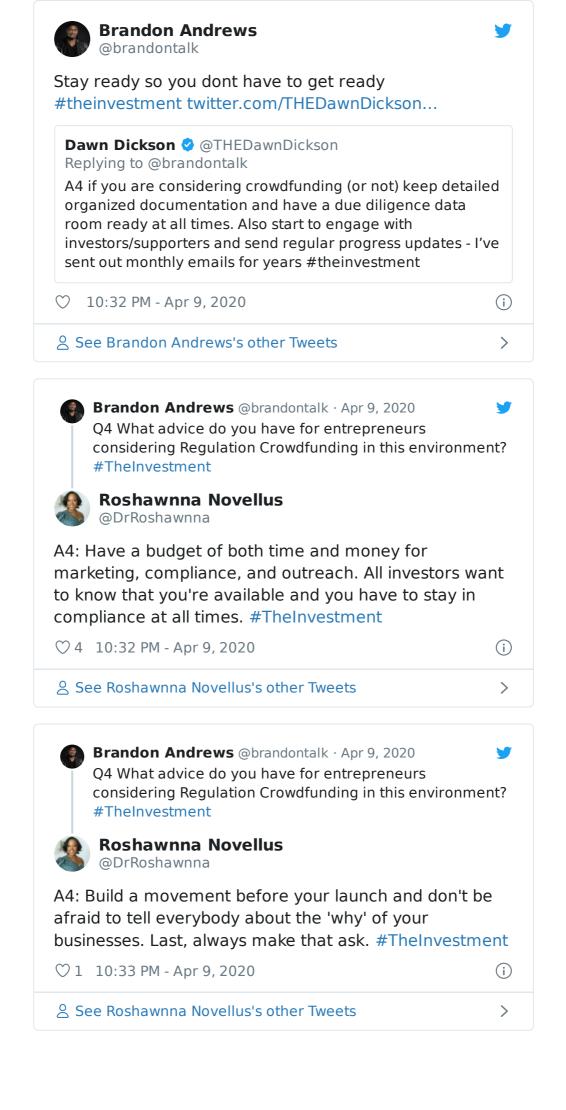




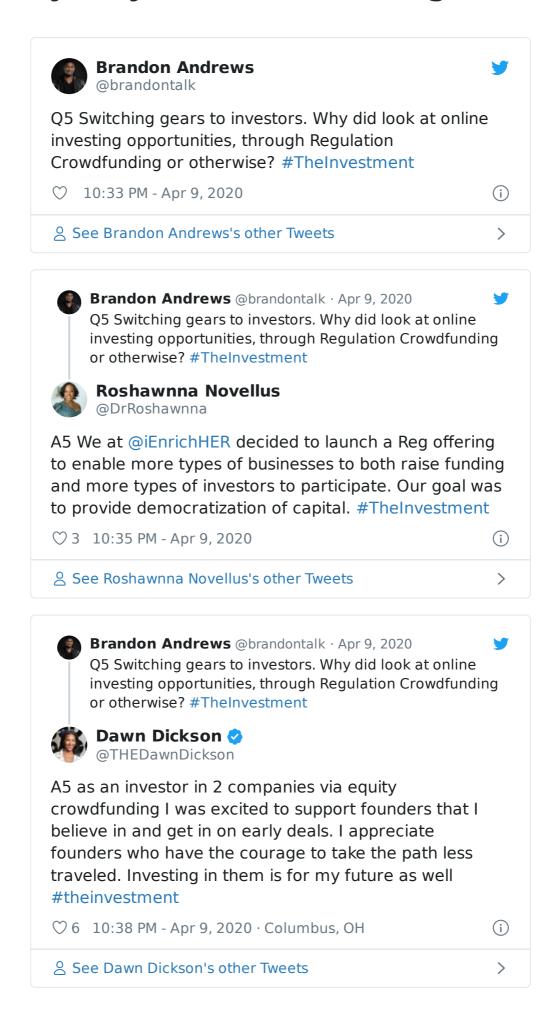






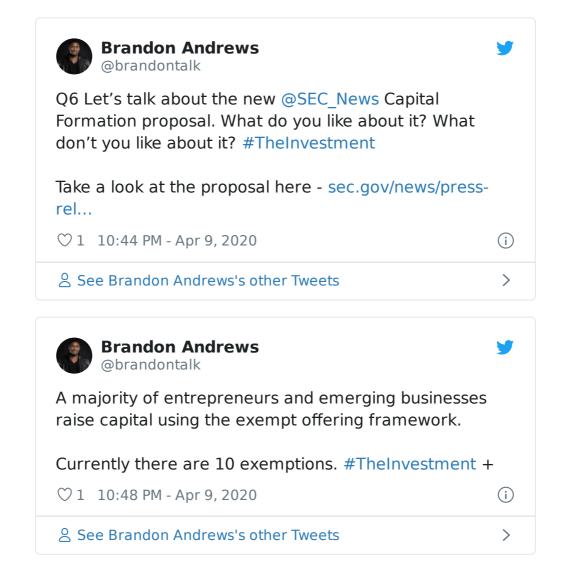


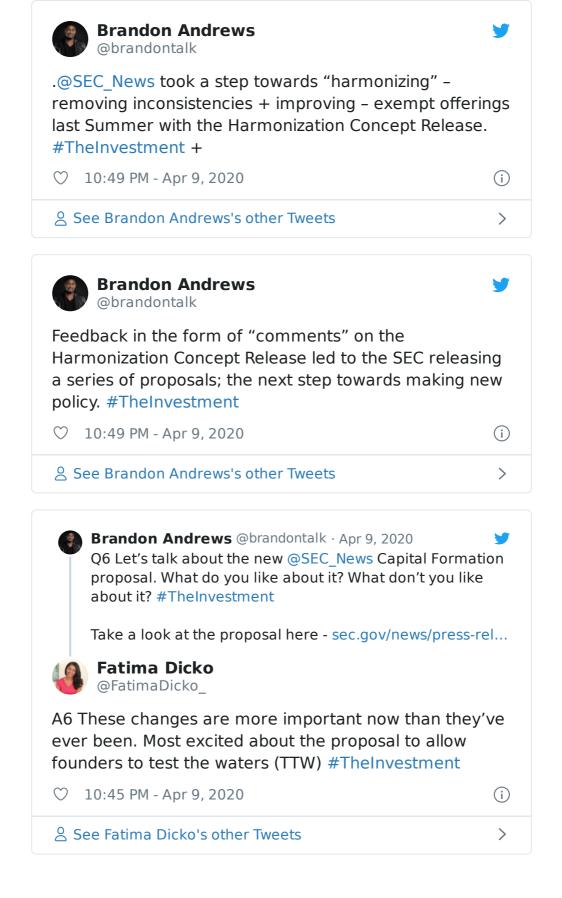
Q5 - Why did you look at investing online?

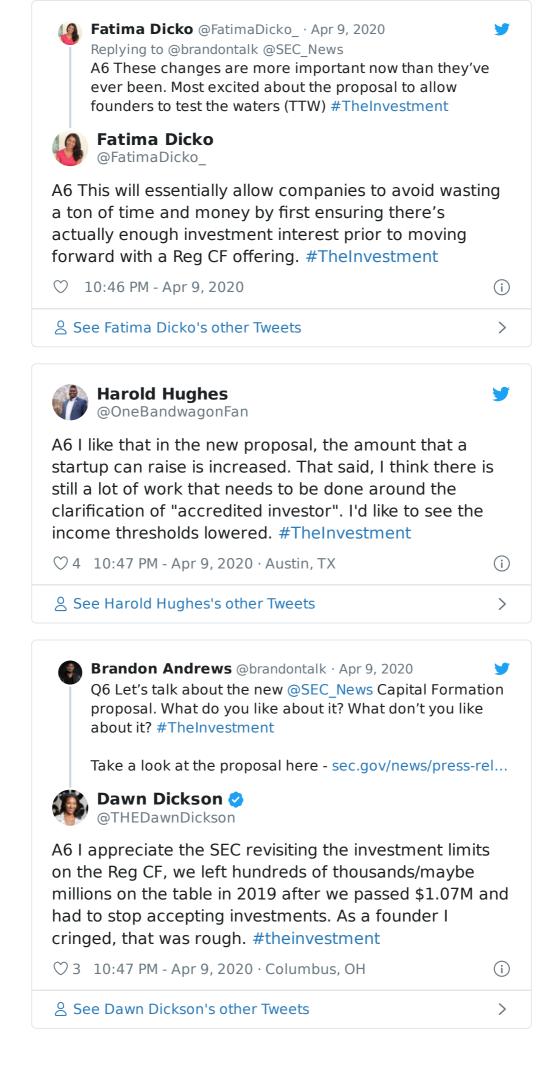


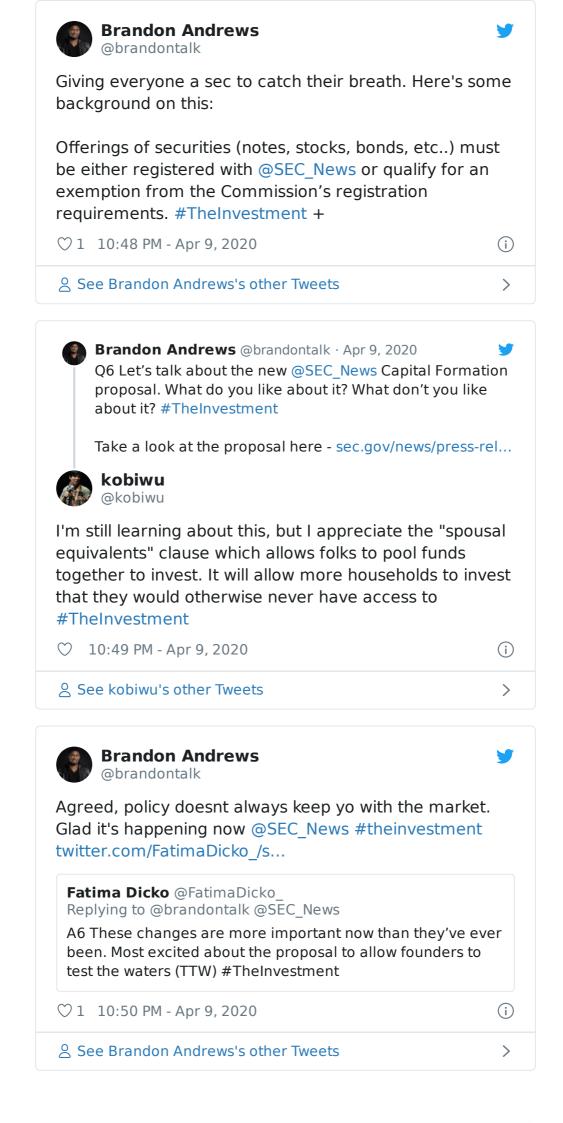


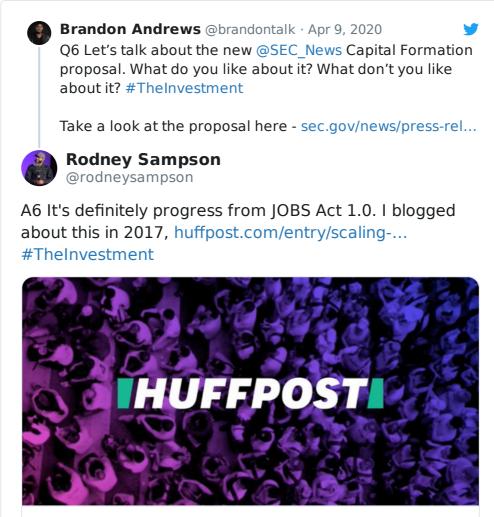
Q6 - Thoughts on the US Securities and Exchange Commission Capital Formation Proposal?











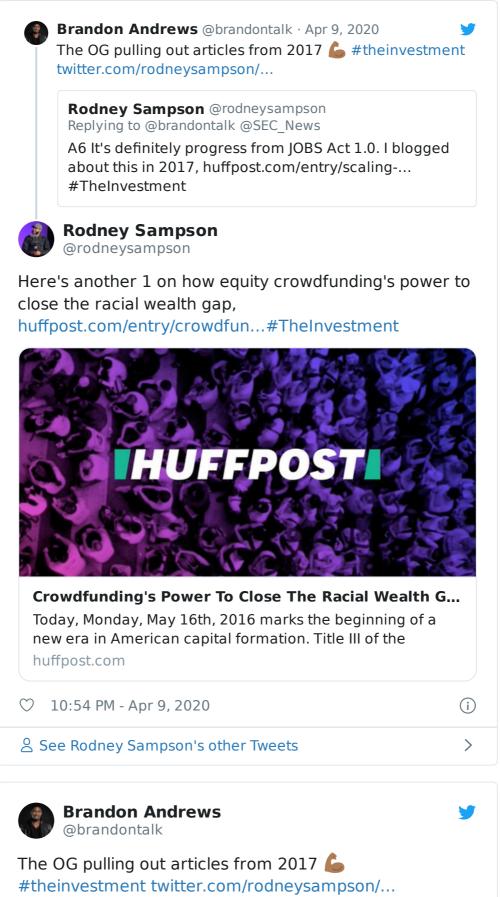
Scaling Diversity In Venture Capital: A Nod To Conti...

Today, I only know of seven active early stage venture capital funds in America that have African American huffpost.com

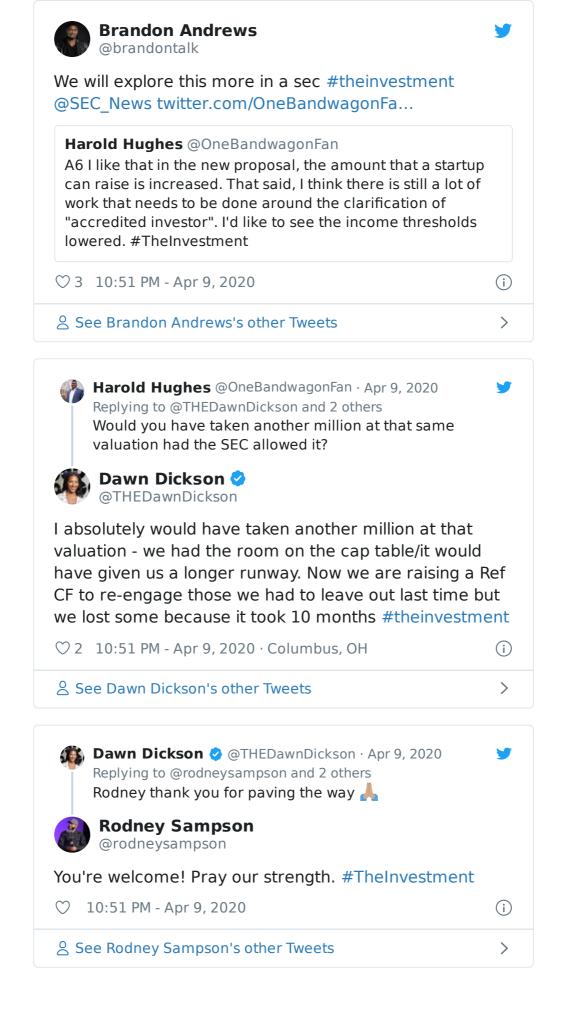
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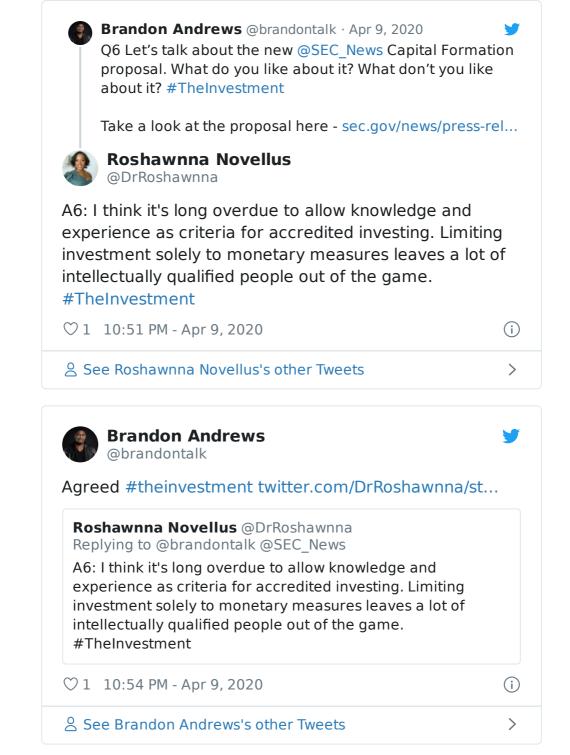
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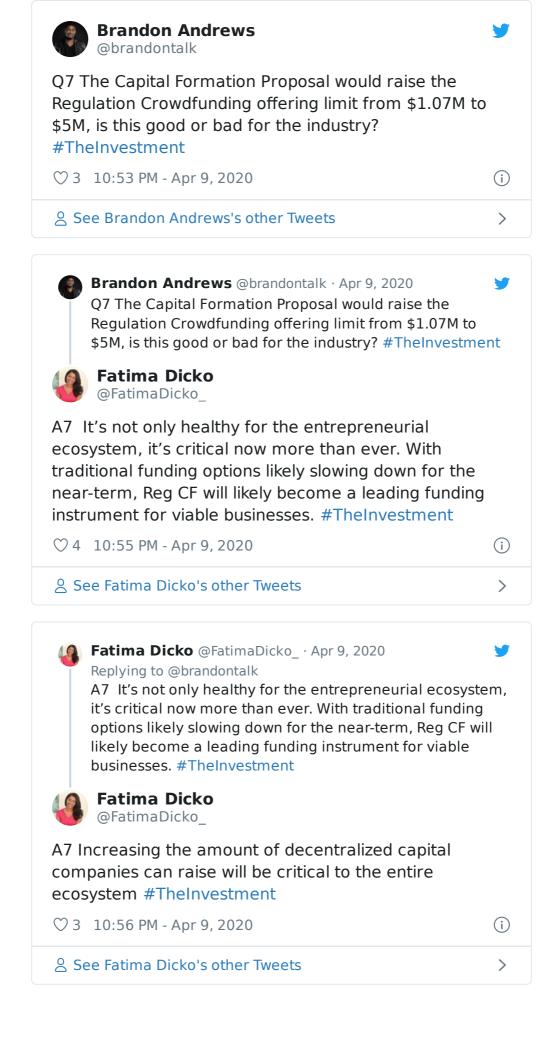








Q7 - Thoughts on increasing Regulation Crowdfunding offering limit from \$1.07M to \$5M?





Q7 The Capital Formation Proposal would raise the Regulation Crowdfunding offering limit from \$1.07M to \$5M, is this good or bad for the industry? #TheInvestment



A7 it's good for founders but I don't see the VC world being a fan - they haven't been. It's going to take education for founders to unite VC/CF worlds and keep the cap table clean. They all assume mine is messy because of crowdfunding but it's only 1 line item #theinvestment



(i)

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A7. Short answer: definitely a good thing. However, I am wondering what the average investment size is once you start raising those amounts. I had folks who wanted to invest in us but didn't want to put 25k on a platform that was going to take 6-15%. #TheInvestment twitter.com/brandontalk/st...

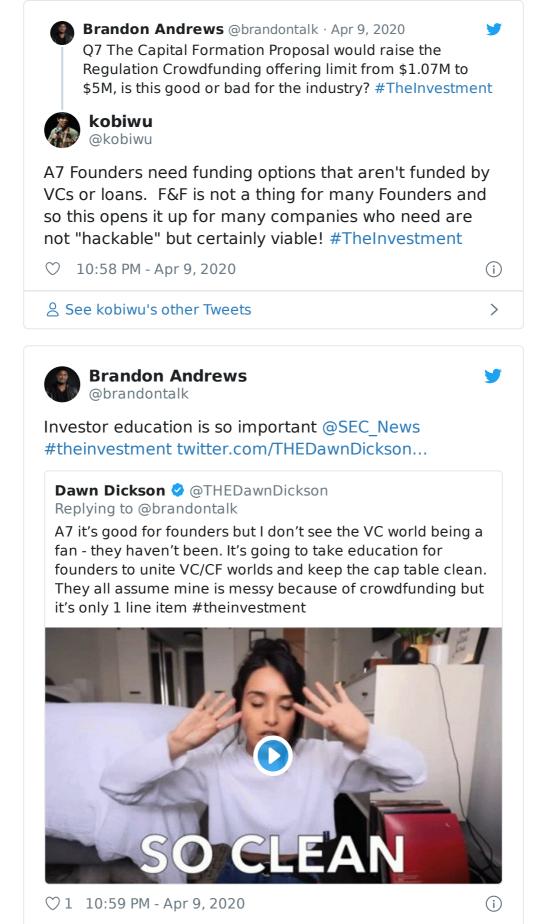
Brandon Andrews @brandontalk

Q7 The Capital Formation Proposal would raise the Regulation Crowdfunding offering limit from \$1.07M to \$5M, is this good or bad for the industry? #TheInvestment

○ 4 10:58 PM - Apr 9, 2020 · Austin, TX

(i)

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See Brandon Andrews's other Tweets





Gotcha. We wouldn't have. We did the crowdfunding campaign with the expectation that we'd only give up X% to the crowd. So if we hit the \$1.07M number, that would've been the top end. Our goal was \$250k which we fell short of $\widehat{\ensuremath{\Omega}}$



That's the beauty of CF you can assess your needs and raise what you want to on your terms. We have experienced very little dilution since inception so we would have loved to run it up #theinvestment



○ 3 10:59 PM - Apr 9, 2020 · Columbus, OH



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Brandon Andrews @brandontalk



Portals like @joinrepublic and @StartEngineLA will have to respond appropriately #theinvestment twitter.com/OneBandwagonFa...

Harold Hughes @OneBandwagonFan

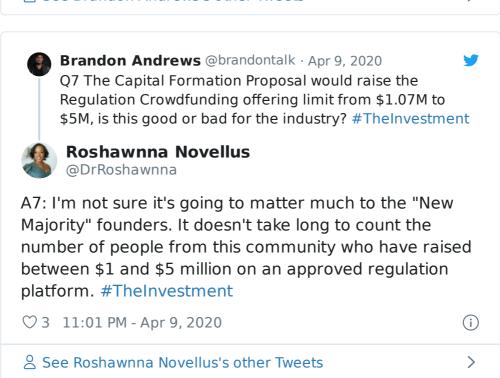
A7. Short answer: definitely a good thing. However, I am wondering what the average investment size is once you start raising those amounts. I had folks who wanted to invest in us but didn't want to put 25k on a platform that was going to take 6-15%. #TheInvestment twitter.com/brandontalk/st...

○ 1 11:00 PM - Apr 9, 2020



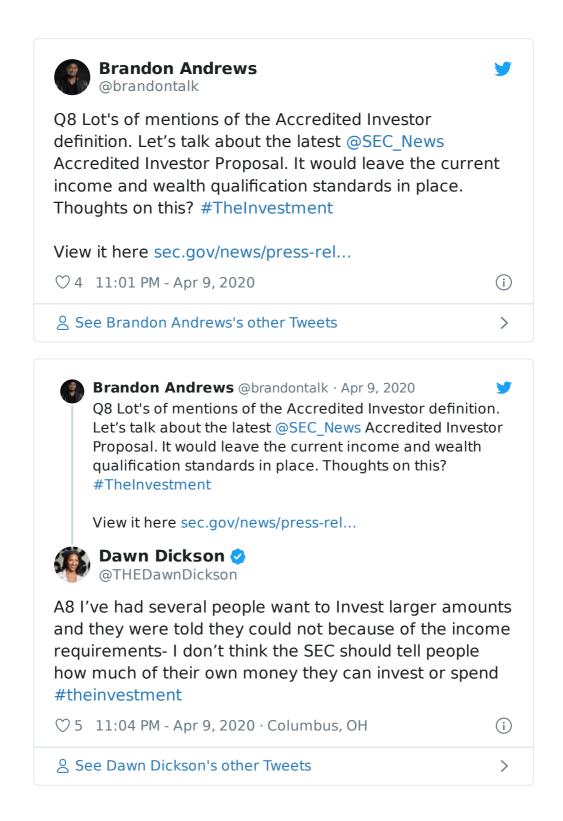
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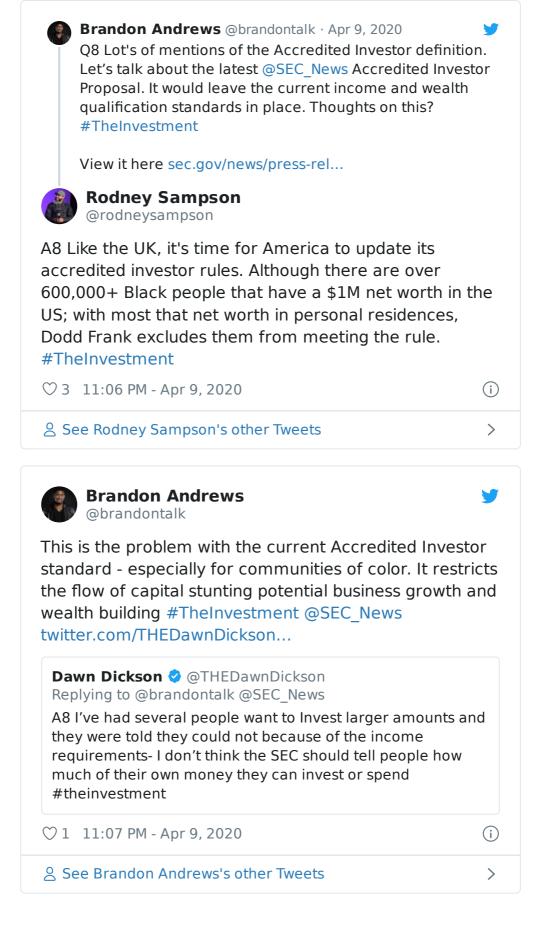


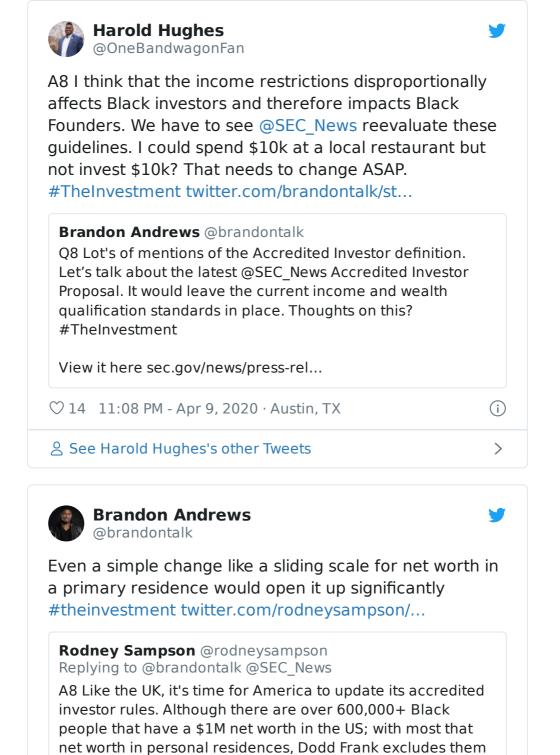




Q8 - Thoughts on the US Securities and Exchange Commission's Accredited Investor Proposal







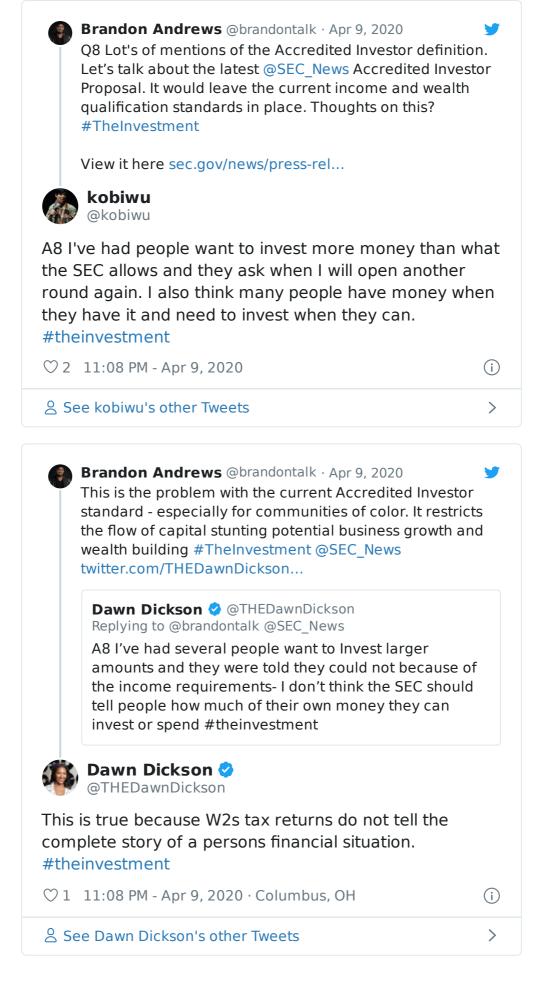
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from meeting the rule. #TheInvestment

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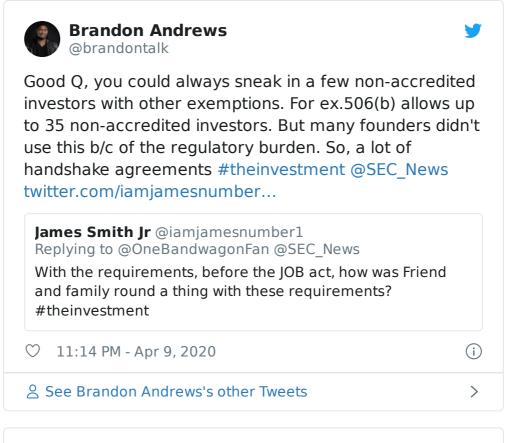


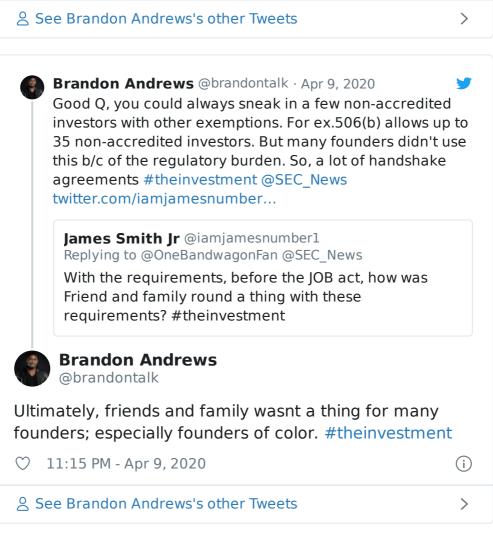


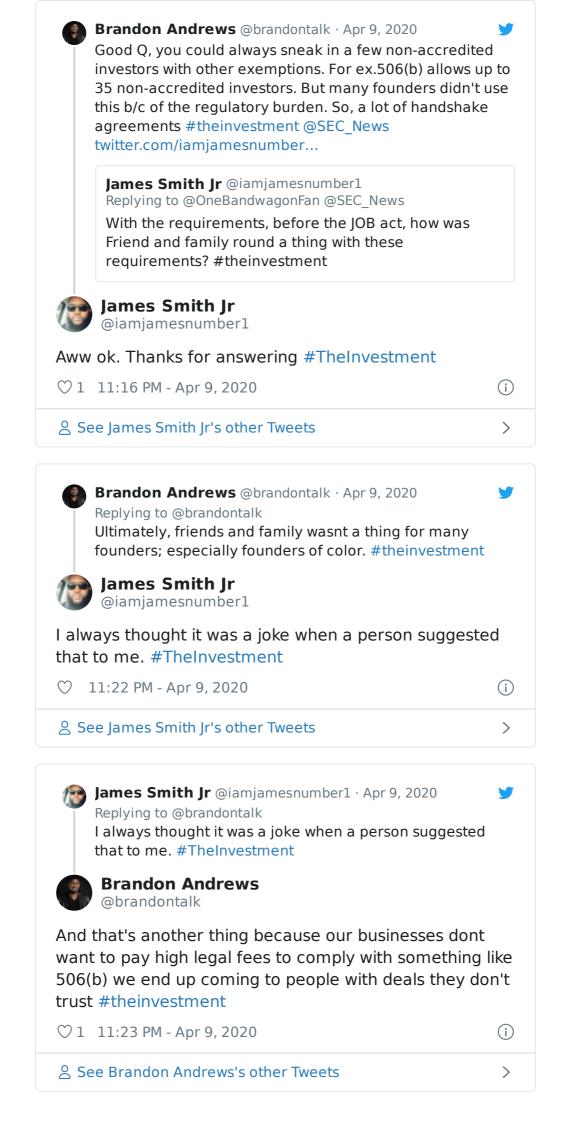


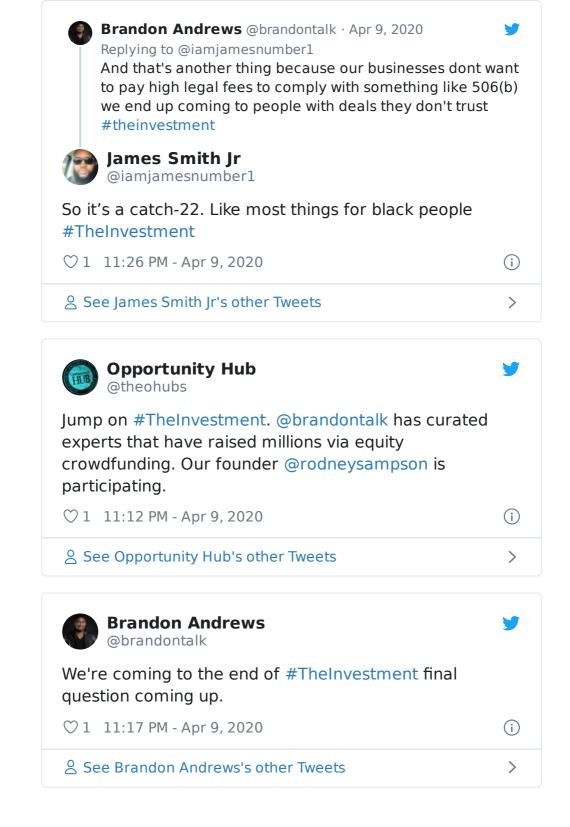
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See James Smith Jr's other Tweets

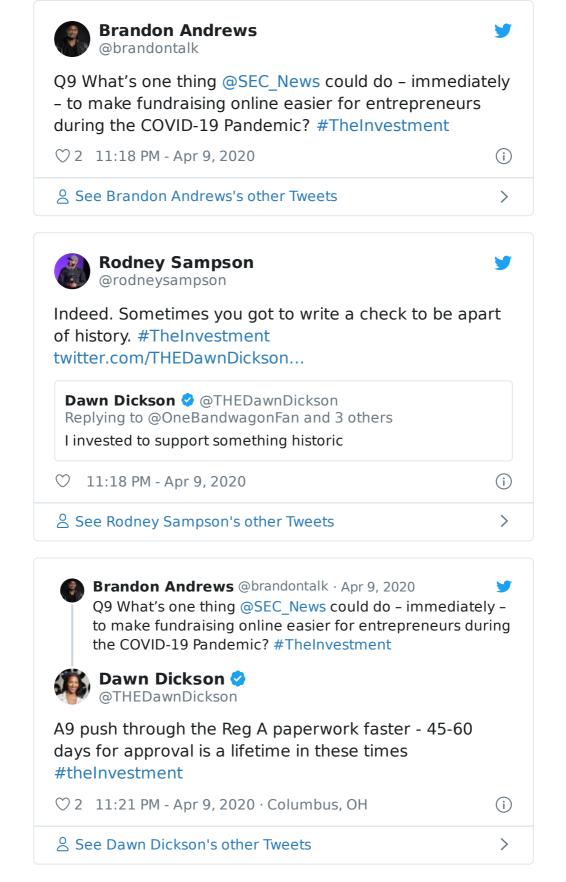


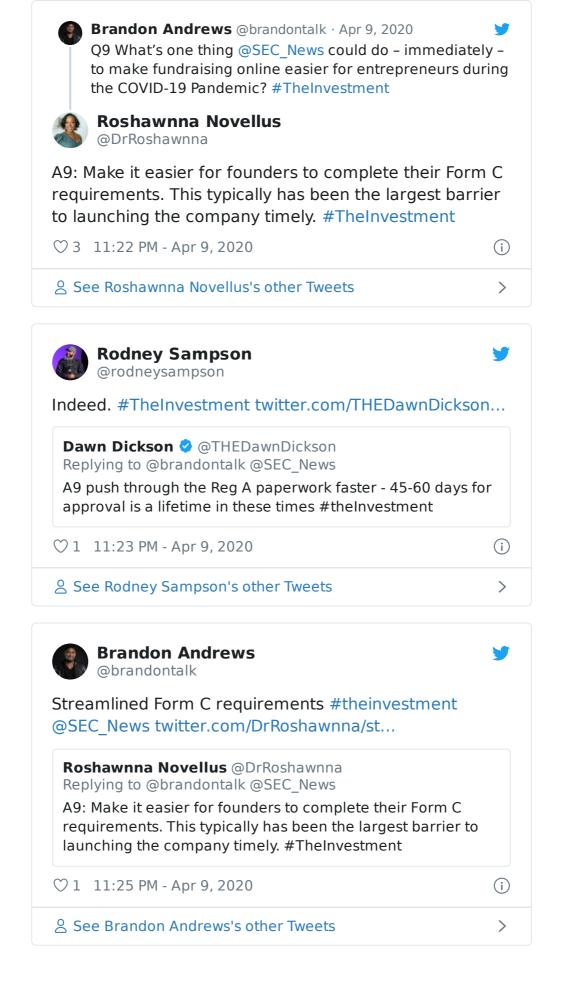


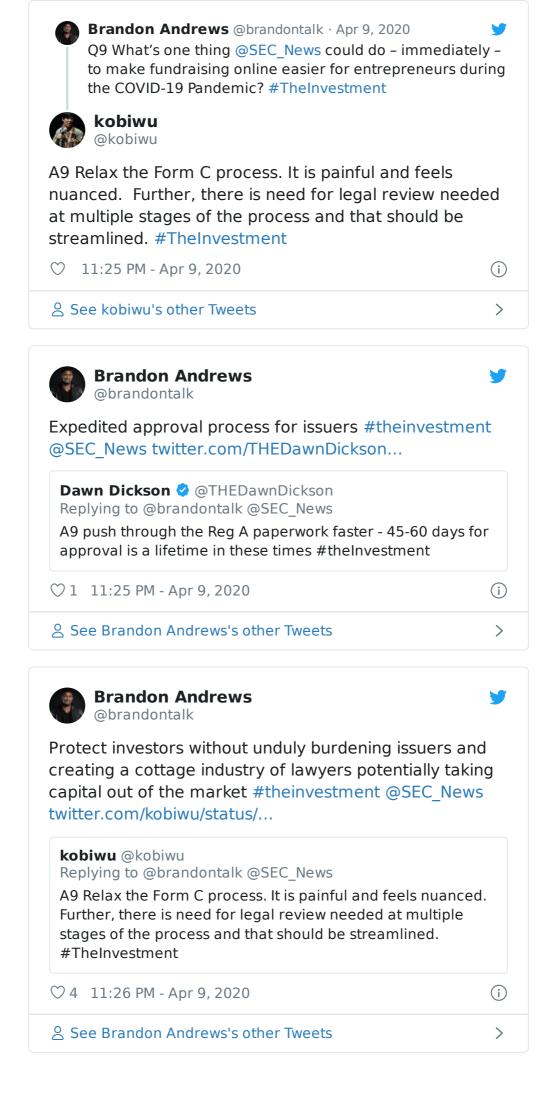


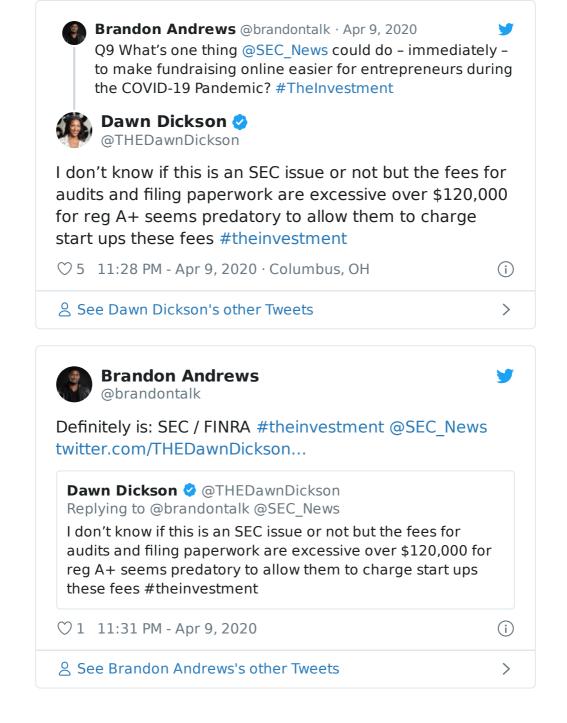


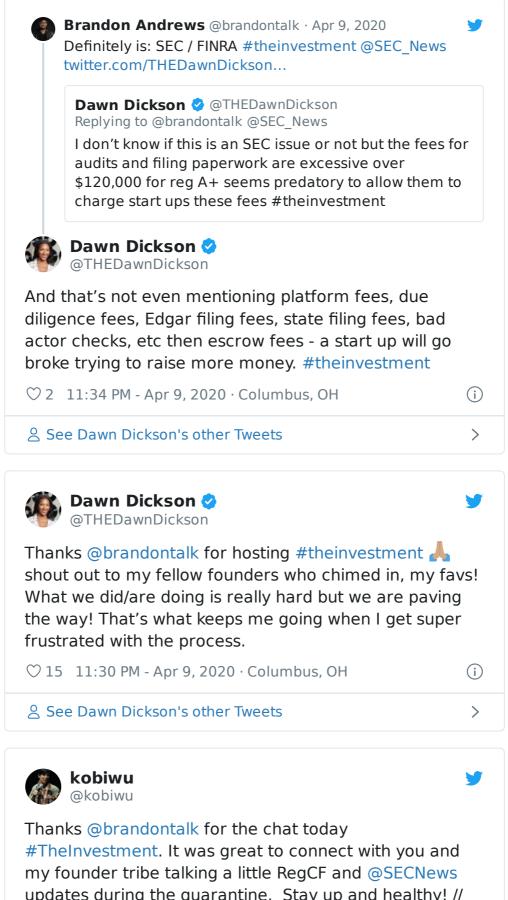
Q9 - How should the US Securities and Exchange Commission respond to COVID-19?



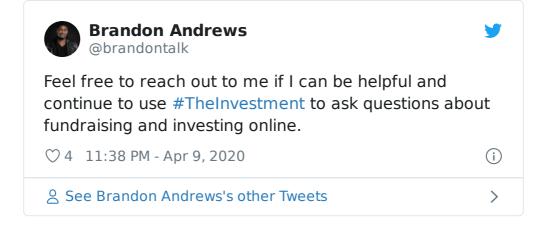












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