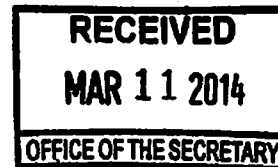


February 5, 2014

Ms. Murphy,
Secretary, Securities and Exchange Commission
100 F Street, N.E.
Washington, D.C. 20549-1090



Re: Comments on Proposed Rule: JOBS Title III (#141-146) Crowdfunding submitted on 2/3/2014

Dear Ms. Murphy,

It was pointed out to me that it could be construed that submitted unfinished Novice Investor Body of Knowledge (NIBOK) have been approved by one or more crowdfunding association. That is not the case.

Original

The Advisory Council was formed to address a very important need for investor education pursuant to the Jobs Act. Education is critical both for accredited and non-accredited investors for their long term success, as well as that of the Jobs Act. The Advisory Council consists of a group of prominent practitioners, educators and industry experts with representatives from CFPA, CFIRA NLCFA.

The BOK incorporates recommendations from Presidents Advisory Council on Financial Capability, FINRA Investor Education Foundation and NASSA.

Modified

The Advisory Council was formed to address a very important need for investor education pursuant to the Jobs Act. Education is critical both for accredited and non-accredited investors for their long term success, as well as that of the Jobs Act. The Advisory Council consists of a group of prominent practitioners, educators and industry experts with members of crowdfunding associations (CFIRA, CFPA & NLCFA) present.

The BOK incorporates guidelines from Presidents Advisory Council on Financial Capability, FINRA Investor Education Foundation and NASSA.

The unfinished Novice Investor Body of Knowledge (NIBOK) developed by The Advisory Council has not been properly reviewed or approved by listed in alphabetical order crowdfunding associations - ACFA, CAANG, CFIRA, CFPA, NECFA or any other professional crowdfunding association.

BODY OF KNOWLEDGE

Body of Knowledge is a term used to represent the complete set of concepts, terms and activities that make up a professional domain, as defined by the relevant professional association.

While the term *body of knowledge* is also used to describe the document that defines that knowledge – the *body of knowledge* itself is more than simply a collection of terms; a professional reading list; a library; a website or a collection of websites; a description of professional functions; or even a collection of information. It is the accepted ontology for a specific domain.

It should not make a difference which professional association decides to finish the unfinished BOK. It should be reviewed & hopefully approved by all. The approval probably be could be limited to CFIRA, CFPA & NLCFA. I would like to disclose that I am a member of these three associations & applied for membership in CAANG.

I urge the Commission to adopt final rules that will apply rigorous standards to investor education. The SEC's responsibility is to assure that a learner has understood and is capable of applying the acquired knowledge

Thank you for your consideration of these comments. If you have questions or we can assist in any way, please contact Alexander Gimpelson at [REDACTED]

Alexander "Sasha" Gimpelson