

MEMORANDUM

TO: File No. S7-09-13 - Crowdfunding

FROM: Eduardo A. Aleman
Special Counsel
Division of Corporation Finance

RE: Meeting with Representative of VerInvest Corporation

DATE: April 23, 2014

On April 23, 2014, Sebastian Gomez Abero, Eduardo Aleman, and Jessica Dickerson of the Division of Corporation Finance, Leila Bham, Tim White, Devin Ryan, and Joanne Rutkowski of the Division of Trading and Markets met with David Benway, Chief Executive Officer of VerInvest Corporation to discuss the implementation of Title III of the Jumpstart Our Business Startups Act.