

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

August 11, 2020

Rory J. Cutaia Chief Executive Officer Verb Technology Company, Inc. 2210 Newport Boulevard, Suite 200 Newport Beach, CA 92663

> Re: Verb Technology Company, Inc. Registration Statement on Form S-3 Filed August 10, 2020 File No. 333-243438

Dear Mr. Cutaia:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Cara Wirth at (202) 551-7127 with any questions.

Sincerely,

Division of Corporation Finance Office of Trade & Services

cc: Larry A. Cerutti, Esq.