

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

DIVISION OF CORPORATION FINANCE

September 23, 2019

Richard S. Stoddart Chief Executive Officer Innerworkings Inc. 203 North LaSalle Street, Suite 1800 Chicago, Illinois 60601

> Re: Innerworkings Inc. Preliminary Proxy Statement on Schedule 14A Filed August 14, 2019 File No. 000-52170

Dear Mr. Stoddart:

We have completed our review of your filing. 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.

Sincerely,

Division of Corporation Finance Office of Consumer Products