



DIVISION OF
CORPORATION FINANCE

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

October 9, 2019

Richard Stoddart
Chief Executive Officer
INNERWORKINGS INC
203 North LaSalle Street, Suite 1800
Chicago, IL 60601

Re: INNERWORKINGS INC
Form 10-K for the Fiscal Year Ended December 31, 2018
Filed March 19, 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 Trade & Services