



DIVISION OF  
CORPORATION FINANCE

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

March 26, 2020

Alfred Poor  
Chief Executive Officer  
Ideanomics, Inc.  
55 Broadway, 19th Floor  
New York, NY 10006

**Re: Ideanomics, Inc.**  
**Registration Statement on Form S-3**  
**Filed March 18, 2020**  
**File No. 333-237251**

Dear Mr. Poor:

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 Kathleen Krebs, Special Counsel, at 202-551-3350 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Technology