



DIVISION OF  
CORPORATION FINANCE

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

February 18, 2020

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

**Re: Ideanomics, Inc.**  
**Form 10-K for the Year Ended December 31, 2018**  
**Filed April 1, 2019**  
**Amendment No. 1 to Form 10-Q for the Quarter Ended September 30, 2019**  
**Filed February 14, 2020**  
**File No. 001-35561**

Dear Mr. Poor:

We have completed our review of your filings. 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 Technology

cc: William N. Haddad