May 21, 2020

Richard Mills Chief Executive Officer Creative Realities, Inc. 13100 Magisterial Drive, Suite 100 Louisville, KY 40223

Re: Creative Realities,

Inc.

Registration

Statement on Form S-3

Filed May 15, 2020 File No. 333-238275

Dear Mr. Mills:

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 Matthew

Derby, Staff Attorney, at (202) 551-3334 with any questions.

Sincerely,

Division of Corporation Finance

Office of Technology

cc: Bradley Pederson