

InnovaQor, Inc.  
400 South Australian Avenue, Suite 800  
West Palm Beach, Florida 33401

April 29, 2022

VIA EDGAR

Division of Corporation Finance  
Office of Technology  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549  
Attn: Olivia Bobes, Matthew Derby, Joseph Kempf and Kathryn Jacobson

Re: InnovaQor, Inc.  
Request to Withdraw Registration Statement on Form 10, as amended  
Filed March 3, 2022 and April 20, 2022  
File No. 000-33191

Dear Sirs and Madams:

Pursuant to Rule 477 promulgated under the Securities Act of 1933, as amended, InnovaQor, Inc., a Nevada corporation (the "Company"), hereby respectfully requests that the Securities and Exchange Commission consent to the withdrawal of the Registration Statement on Form 10 (SEC File No. 000-33191), filed by the Company on March 3, 2022, as amended by Amendment No. 1 filed by the Company on April 20, 2022 (the "Registration Statement"), in connection with the registration of the Company's common stock, par value \$0.0001 per share, under Section 12(g) of the Securities Exchange Act of 1934, as amended (the "Exchange Act"). The Company reserves the right to submit the Registration Statement at a future date.

In the absence of this withdrawal application, pursuant to Section 12(g)(1) of the Exchange Act, the Form 10 Registration Statement would automatically become effective 60 days after the initial filing of the Form 10 Registration Statement. The Company believes that it is in the best interest of the Company to withdraw the Registration Statement prior to the effective date. Accordingly, the Company respectfully requests that the Form 10 Registration Statement be withdrawn effective as of the date hereof or at the earliest practical date but in any event prior to May 1, 2022.

If you have any questions or require additional information, please do not hesitate to contact the undersigned at (561) 421-3800, or J. Thomas Cookson of Shutts & Bowen LLP, our outside legal counsel, at (305) 379-9141.

Sincerely,

InnovaQor, Inc.

By: /s/ Sharon L. Hollis  
Name: Sharon L. Hollis  
Title: Chief Executive Officer

cc: J. Thomas Cookson, Shutts & Bowen LLP

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