

April 30, 2025

U.S. Securities and Exchange Commission Division of Corporation Finance 100 F Street, NE Washington, D.C. 20549

RE: Innovator ETFs Trust

Issuer CIK: 0001415726

Issuer File Number: 333-146827/811-22135

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To Whom It May Concern:

Cboe BZX Exchange, Inc. certifies its approval for listing and registration of the Innovator Growth-100 Power Buffer ETF – May, Innovator U.S. Small Cap Power Buffer ETF - May, and Innovator Equity Defined Protection ETF – 1 Yr May under the Exchange Act of 1934.

Sincerely,

Bianea Stodden

Bianca Stodden Senior Analyst, Listing Qualifications