



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549-7010

Mail Stop 7010

January 2, 2008

Mr. James M. Zemlyak  
Stifel Financial Corp.  
501 N. Broadway  
St. Louis, Missouri 63102-2188

**RE: Stifel Financial Corp. File #1-9305**  
**Form 10-K for the fiscal year ended December 31, 2006**  
**Form 10-Q for the period ended September 30, 2007**

Dear Mr. Zemlyak:

We have completed our review of your Form 10-K and related filings and have no further comments at this time.

If you have any further questions regarding our review of your filings, please direct them to Tricia Armelin, Staff Accountant, at (202) 551-3747 or, in her absence, to the undersigned at (202) 551-3768.

Sincerely,

John Cash  
Accounting Branch Chief