Mail Stop 4561

February 9, 2009

VIA USMAIL and FAX (314) 342 - 2115

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

Re: Stifel Financial Corporation Form 10-K for the year ended 12/31/2007 Filed on 3/4/2008 File No. 001-09305

Dear Mr. James M. Zemlyak:

We have completed our review of your Form 10-K and related filings and do not, at this time, have any further comments.

Sincerely,

Cicely LaMothe Branch Chief