



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

DIVISION OF  
CORPORATION FINANCE

February 22, 2018

Via E-mail

Sean M. O'Connor  
Chief Executive Officer  
INTL FCStone Inc.  
708 Third Avenue, Suite 1500  
New York, NY 10017

**Re: INTL FCStone Inc.  
Form 10-K for the Fiscal Year Ended September 30, 2017  
Filed December 14, 2017  
File No. 1-36045**

Dear Mr. O'Connor:

We refer you to our comment letter dated February 16, 2018, regarding business contacts with Sudan. We have completed our review of this subject matter. 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.

Sincerely,

/s/ Cecilia Blye

Cecilia Blye, Chief  
Office of Global Security Risk

cc: Era Anagnosti  
Legal Branch Chief  
Division of Corporation Finance