



DIVISION OF  
CORPORATION FINANCE

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

December 16, 2010

Mr. Ronald Pipoly, Jr.  
Chief Financial Officer  
AMTRUST FINANCIAL SERVICES, INC.  
59 Maiden Lane 6th Floor  
New York, NY 10038

**Re: AMTRUST FINANCIAL SERVICES, INC.**  
**Form 10-K for the Period Ended December 31, 2009**  
**Filed March 16, 2010**  
**File No. 001-33143**

Dear Mr. Pipoly:

We have completed our review of the above filing and have no further comments at this time.

Sincerely,

Gus Rodriguez  
Accounting Branch Chief