



DIVISION OF  
CORPORATION FINANCE

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

Mail Stop 4561

July 3, 2008

Kenneth E. Armstrong  
Associate General Counsel  
Raymond James Financial, Inc.  
880 Carillon Parkway  
St. Petersburg, FL 33716

**Re: Raymond James Financial, Inc.  
Form 10-K for Fiscal Year Ended September 30, 2007  
File No. 001-09109  
Proxy Statement on Schedule 14A  
Filed January 7, 2008  
File No. 001-09109**

Dear Mr. James:

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

Please contact Duc Dang, Staff Attorney, at (202) 551-3386 or the undersigned at (202) 551-3785 if you have any other questions.

Sincerely,

Karen Garnett  
Assistant Director