



DIVISION OF  
CORPORATION FINANCE  
Mail Stop 3010

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

May 24, 2010

Thomas A. James  
Chief Executive Officer  
880 Carillon Parkway  
St. Petersburg, FL 33716

**Re: Raymond James Financial, Inc.**  
**Form 10-K for Year Ended September 30, 2009**  
**Form 10-Q for Quarter Ended December 31, 2009**  
**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.

You may contact Stacie Gorman, Attorney, at (202) 551-3585, Karen Garnett, Assistant Director, at (202) 551-3785, Yolanda Crittendon, Accountant, at (202) 551-3472, or the undersigned at (202) 551-3413 if you have questions.

Sincerely,

Cicely LaMothe  
Accounting Branch Chief