



DIVISION OF
CORPORATION FINANCE

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

May 20, 2013

Via E-mail

Jeffrey P. Julien

Executive Vice President – Finance, Chief Financial Officer, and Treasurer

Raymond James Financial, Inc.

800 Carillon Parkway

St. Petersburg, FL 33716

Re: Raymond James Financial, Inc.
Form 10-K for Fiscal Year Ended September 30, 2012
Filed November 21, 2012
File No. 001-09109

Dear Mr. Julien:

We have completed our review of your filing. We remind you that our comments or changes to disclosure in response to our comments do not foreclose the Commission from taking any action with respect to the company or the filings and the company may not assert staff comments as a defense in any proceeding initiated by the Commission or any person under the federal securities laws of the United States. We urge all persons who are responsible for the accuracy and adequacy of the disclosure in the filings to be certain that the filings include the information the Securities Exchange Act of 1934 and all applicable rules require.

Sincerely,

/s/ Kevin W. Vaughn

Kevin W. Vaughn
Branch Chief