



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 4720

February 14, 2017

Via Email

Mr. James M. Zemlyak  
President and Chief Financial Officer  
Stifel Financial Corp.  
501 North Broadway  
St. Louis, MO 63102-2188

**Re: Stifel Financial Corp.  
Form 10-K for Fiscal Year Ended December 31, 2015  
Filed March 1, 2016  
File No. 001-09305**

Dear Mr. Zemlyak:

We have completed our review of your filings. 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/ Gus Rodriguez

Gus Rodriguez  
Accounting Branch Chief  
Office of Financial Services