William J. Dunaway Chief Financial Officer INTL FCSTONE INC. 1251 NW Briarcliff Parkway, Suite 800 Kansas City, MO 64116

> Re: INTL FCSTONE INC. Registration Statement on Form S-3 Filed May 9, 2019 File No. 333-231301

Dear Mr. Dunaway:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. 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.

Please contact Jessica Livingston at 202-551-3448 with any questions.

Sincerely, Division of Office of Financial

Corporation Finance

Services