

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

December 2, 2024

Michele M. Kawiecki Chief Financial Officer First Merchants Corporation 200 East Jackson Street Muncie, Indiana 47305

> Re: First Merchants Corporation Form 10-K for the Fiscal Year Ended December 31, 2023 File No. 001-41342

Dear Michele M. Kawiecki:

We have completed our review of your filing. 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,

Division of Corporation Finance Office of Life Sciences

cc: Brian Hunt