



DIVISION OF  
CORPORATION FINANCE

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

July 26, 2018

Francis M. Fetsko  
Chief Operating Officer and Chief Financial Officer  
Tompkins Financial Corporation  
118 E. Seneca Street, P.O. Box 460  
Ithaca, NY 14851

**Re: Tompkins Financial Corporation  
Registration Statement on Form S-3  
Filed July 23, 2018  
File No. 333-226312**

Dear Mr. Fetsko:

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 Christopher Dunham, Staff Attorney, at (202) 551-3783 with any questions.

Division of Corporation Finance  
Office of Financial Services

cc: Alyssa Hochberg Fontaine