



DIVISION OF
CORPORATION FINANCE

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

July 30, 2021

Stephen S. Romaine
Chief Executive Officer
Tompkins Financial Corporation
P.O. Box 460
Ithaca, NY 14851

Re: Tompkins Financial Corporation
Registration Statement on Form S-3
Filed July 27, 2021
File No. 333-258191

Dear Mr. Romaine:

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 Tonya K. Aldave at (202) 551-3601 with any questions.

Sincerely,

Division of Corporation Finance
Office of Finance

cc: Alyssa H. Fontaine, Esq.