

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

December 20, 2018

James B. Lally Chief Executive Officer Enterprise Financial Services Corp 150 North Meramec Clayton, MO 63105

> Re: Enterprise Financial Services Corp Form 10-K for the Fiscal Year Ended December 31, 2017 Filed February 23, 2018 File No. 001-15373

Dear Mr. Lally:

We have limited our review of your filing to the financial statements and related disclosures and have the following comments. In some of our comments, we may ask you to provide us with information so we may better understand your disclosure.

Please respond to these comments within ten business days by providing the requested information or advise us as soon as possible when you will respond. If you do not believe our comments apply to your facts and circumstances, please tell us why in your response.

After reviewing your response to these comments, we may have additional comments.

## Form 10-K for the Fiscal Year Ended December 31, 2017

<u>Management's Discussion and Analysis of Financial Condition and Results of Operations</u>

<u>Executive Summary, page 30</u>

1. We note your presentation of full non-GAAP income statements which place undue prominence and create the impression that the non-GAAP measures represent a comprehensive basis of accounting. Please confirm that you will not present full non-GAAP income statements in future filings, including your quarterly 10-Qs and earnings releases filed under Form 8-K and related exhibits therein. Refer to Question 102.10 of the Non-GAAP Financial Measures Codification and Disclosure Interpretations and Item 10(e)(1)(i)(A) of Regulation S-K.

In closing, 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

James B. Lally Enterprise Financial Services Corp December 20, 2018 Page 2

absence of action by the staff.

You may contact Christina Harley at 202-551-3695 or Michelle Miller at 202-551-3368 with any questions.

Sincerely,

Division of Corporation Finance Office of Financial Services