



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

DIVISION OF  
CORPORATION FINANCE

Mail Stop 4720

September 20, 2016

Aaron P. Graft  
President and Chief Executive Officer  
Triumph Bancorp, Inc.  
12700 Park Central Drive  
Suite 1700  
Dallas, TX 75251

**Re: Triumph Bancorp, Inc.  
Amendment No. 1 to Registration Statement on Form S-3  
Filed September 13, 2016  
File No. 333-213169**

Dear Mr. Graft:

We have reviewed your amended registration statement 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 this letter by amending your registration statement and providing the requested information. If you do not believe our comments apply to your facts and circumstances or do not believe an amendment is appropriate, please tell us why in your response.

After reviewing any amendment to your registration statement and the information you provide in response to these comments, we may have additional comments. Unless we note otherwise, our references to prior comments are to comments in our September 8, 2016 letter.

Description of Purchase Contracts, page 29

1. We note your response to comment three and your revised disclosure. The revised disclosure indicates that the purchase contracts may be settled in cash by "reference or linkage to the value, performance or level of our common stock or preferred stock." Given that these contracts are not intended to be physically settled, please provide us with your legal analysis as to whether these contracts should be characterized as security-based swaps.

Aaron P. Graft  
Triumph Bancorp, Inc.  
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Please contact Eric Envall at (202) 551-3234 or me at (202) 551-3338 with any questions.

Sincerely,

/s/ Dietrich A. King

Dietrich A. King  
Assistant Director  
Office of Financial Services

cc: Mark Veblen, Wachtell, Lipton, Rosen & Katz