



DIVISION OF  
CORPORATION FINANCE

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

July 30, 2020

Francis M. Fetsko  
Executive Vice President, COO and CFO  
Tompkins Financial Corporation  
P.O. Box 460  
Ithaca, New York 14851

**Re: Tompkins Financial Corporation**  
**Registration Statement on Form S-3**  
**Filed on July 24, 2020**  
**File No. 333-240069**

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 Eric Envall at (202) 551-3234 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Finance