Aisha Reynolds General Counsel & Corporate Secretary CrossFirst Bankshares, Inc. 11440 Tomahawk Creek Parkway Leawood, Kansas 66211

may better understand your disclosure.

Re: CrossFirst Bankshares, Inc.
Amendment No. 1 to
Draft Registration Statement on Form S-1
Submitted March 25, 2019
CIK No. 0001458412

Dear Ms. Reynolds:

We have reviewed your amended draft registration statement and have the following comments. In some of our comments, we may ask you to provide us with information so we

Please respond to this letter by providing the requested information and either submitting an amended draft registration statement or publicly filing your registration.

an amended draft registration statement or publicly filing your registration statement on

EDGAR. 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 the information you provide in response to these comments and your

amended draft registration statement or filed registration statement, we may have additional comments.

Draft Registration Statement on Form S-1 Submitted March 25, 2109

Prospectus Summary Competitive Strengths Sophisticated Suite of Banking Services to Facilitate Full-Service Commercial Relationships, page 7

1. Please revise the pie chart depicting Deposits as of December 31, 2018 here and on page

 $\,$  94 under the title Business  $\,$  Deposit Composition to reflect Time Deposits greater than or

equal to \$100,000 to be 14.2% and Time Deposits less than \$100,000 to be 17.3%

consistent with the disclosure appearing on page 75 under the title MD&A Discussion  $\,$ 

and Analysis of Financial Condition Deposits.

Aisha Reynolds

FirstName Bankshares, Inc. Reynolds

CrossFirst LastNameAisha

Comapany NameCrossFirst Bankshares, Inc.

April 9, 2019

April 2 2019 Page 2

Page 9, FirstName L

FirstName LastName

The Offering

Listing , page 12

2. We note your disclosure here and on page 51 under the title Dilution that all information

in the prospectus excludes shares of common stock issuable upon the exercise or  $% \left( 1\right) =\left( 1\right) \left( 1\right) +\left( 1\right) \left( 1\right) \left( 1\right) +\left( 1\right) \left( 1\right)$ 

settlement of equity awards, warrants, future awards under the 2018 Omnibus Equity

Incentive Plan and common stock issuable under the Employee Stock

Purchase Plan at March 7, 2019. Please provide a reconciliation of the amount of common

stock issuable at

12/31/18 as disclosed in the financial statements to March 7, 2019.

Management's Discussion and Analysis of Financial Condition and Results of Operations

Discussion and Analysis of Financial Condition

Investment Portfolio, page 63

3. We note the table which presents the fair value of investment

portfolio securities by their

stated maturities, as well as the average yields for each maturity range at December 31,

2018 and December 31, 2017. While you disclose that certain securities, primarily

 $\,$  mortgage-backed securities, do not have a single maturity date and are shown separately,

these securities are presented by maturity ranges. Please revise the table to be consistent  $% \left( 1\right) =\left( 1\right) +\left( 1\right)$ 

with the disclosure presented in Note 2: Securities on page F-18. Deposits, page 75

4. We note the table of average deposit balances and weighted average rates for the years  $\frac{1}{2}$ 

ended December 31, 2018, 2017 and 2016. Please revise the average balance amounts of

 $\,$  NOW and savings and Money market deposits for the year ended December 31, 2018 to

be consistent with the amounts presented in the average balance sheet appearing on page

56 under the title Management's Discussion And Analysis Of Financial Condition And

Results Of Operations Discussion and Results of Operations Year Ended December

31, 2018 vs. Year Ended December 31, 2017 Net Interest Income and Net Interest

Margin.

Capital Requirements , page 80

5. We note the table of capital requirements applicable to the company and the bank. Please

revise the amounts of Regulatory capital ratio requirements for the company for the year  $\,$ 

ended December 31, 2017 to be consistent with the related amounts appearing in Note 12:

Regulatory Matters on page F-36.

Aisha Reynolds

CrossFirst Bankshares, Inc.

April 9, 2019

Page 3

You may contact Christina Harley at 202-551-3695 or John Nolan at 202-551-3492 if

you have questions regarding comments on the financial statements and related matters. Please  $\,$ 

contact Jessica Livingston at 202-551-3448 or Pam Long at 202-551-3765 with any other

questions.

FirstName LastNameAisha Reynolds Comapany NameCrossFirst Bankshares, Inc. Sincerely,

Division of

Corporation Finance April 9, 2019 Page 3

Services

FirstName LastName

Office of Financial