COMMERCE BANK, N.A. FEDERAL FUNDS SOLD REPORT December-08

	Leverage Ratio	Tier I RBC	Total RBC
ALABAMA			
Compass Bank-Birmingham Regions Bank-Birmingham Colonial Bank-Montgomery	6.26% 6.91% 6.03%	7.41% 8.41% 8.54%	10.75% 11.55% 11.37%
CALIFORNIA			
Bank of the West-San Francisco City National Bank-Beverly Hills Union Bank of California-San Francisco Westamerica Bank-San Rafael	7.65% 7.87% 8.31% 6.52%	9.15% 8.81% 8.67% 9.31%	10.44% 10.50% 11.01% 10.78%
CONNECTICUT			
Webster Bank, NA-Waterbury	7.36%	9.57%	12.05%
DELAWARE			
Chase Bank USA, N.ANewark Wilmington Trust CoWilmington	12.82% 8.88%	11.03% 9.20%	12.71% 10.45%
GEORGIA			
Columbus Bank-Columbus Suntrust Bank-Atlanta	12.67% 7.60%	13.89% 7.88%	15.15% 10.87%
HAWAII			
Bank of Hawaii-Honolulu First Hawaiian Bank-Honolulu	6.97% 13.13%	10.76% 17.43%	12.02% 18.62%
ILLINOIS			
Harris National Association-Chicago First Midwest Bank-Itasca Northern Trust Company-Chicago	7.24% 8.19% 6.44%	10.57% 10.09% 10.87%	12.69% 11.34% 14.06%
INDIANA			
Old National Bank-Evansville	8.39%	11.32%	13.67%
MASSACHUSETTS			
State Street Bank & Trust-Boston	7.63%	19.76%	21.28%
MISSISSIPPI			
Trustmark National Bank-Jackson	10.16%	12.66%	14.60%
MISSOURI			
UMB Bank-Kansas City	6.80%	10.88%	11.74%
NEBRASKA			
First National Bank of Omaha	7.35%	8.20%	11.40%

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	<u>Leverage Ratio</u>	Tier I RBC	Total RBC
NEW YORK			
Bank of New York Mellon-New York City Manufacturers & Traders TC-Buffalo Citibank-New York City Signature Bank-New York City	5.86% 6.96% 5.84% 10.61%	11.26% 7.32% 9.94% 17.00%	14.75% 11.35% 15.18% 17.83%
NORTH CAROLINA			
Branch Banking & Trust-Winston-Salem Wachovia Bank, N.AWinston- Salem Bank of America,N.ACharlotte RBC Bank (USA)-Raleigh	8.70% 5.38% 5.94% 6.41%	10.80% 6.46% 8.51% 7.56%	13.55% 10.92% 11.71% 10.83%
OHIO			
Huntington National Bank-Columbus National City Bank-Cleveland Keybank-Cleveland Fifth Third Bank-Cincinnati JPMorgan Chase Bank-Columbus US Bank National Association-Cincinnati	5.99% 8.87% 7.82% 7.03% 5.90% 6.15%	6.44% 10.23% 7.84% 8.13% 8.73% 6.56%	10.71% 13.95% 11.86% 10.92% 12.48% 10.51%
OKLAHOMA			
Bank of Oklahoma-Tulsa	6.46%	7.96%	12.22%
PENNSYLVANIA			
BYN Mellon, N.APittsburgh PNC Bank, N.APittsburgh Fulton Bank-Lancaster	8.47% 6.30% 7.71%	12.16% 7.09% 8.65%	13.38% 10.29% 10.84%
SOUTH CAROLINA			
Carolina First Bank-Greenville	9.49%	10.88%	12.59%
SOUTH DAKOTA			
Citibank, N.ASioux Falls Wells Fargo, N.ASioux Falls	15.61% 6.32%	. 15.68% 7.27%	20.36% 10.81%
TENNESSEE			
First Tennessee Bank, N.AMemphis	11.64%	14.34%	19.21%
<u>TEXAS</u>			
Comerica Bank-Dallas Texas Capital Bank, NA-Dallas	8.64% 9.56%	7.83% 9.34%	11.49% 10.29%
UTAH			
Zions First National Bank-Salt Lake City	6.93%	8.33%	11.37%
VIRGINIA	•		
Capital One Bank-Glen Allen Capital One, NA-McLean	11.79% 7.81%	13.02% 10.50%	15.65% 11.82%
WISCONSIN			

COMMERCE BANK, N.A. FEDERAL FUNDS SOLD REPORT December-08

	<u>Leverage Ratio</u>	<u>Tier I RBC</u>	<u>Total RBC</u>
Associated Bank, NA-Green Bay	7.31%	9.07%	10.32%
Marshall & Ilsley Bank-Milwaukee	7.62%	8.27%	12.19%

The information used in preparing this report was obtained from sources outside the bank α the ratios are accurate to the best of our knowledge.