COMMERCE BANK, N.A. CAPITAL RATIOS 30-Jun-05

	June <u>2005</u>	December <u>2004</u>	December <u>2003</u>
1. Leverage Ratio	7.31%	7.28%	7.39%
2. Tier I RBC	9.04%	9.18%	9.20%
Total RBC	10.22%	10.39%	10.45%