COMMERCE BANK, N.A. CAPITAL RATIOS JUNE 30,2009

		June _2009	December2008	December <u>2007</u>
1.	Leverage Ratio	8.05%	8.24% 7.96	5%
2.	Tier I RBC	10.27%	9.96%	9.29%
3.	Total RBC	11.52%	11.21%	10.29%