COMMERCE BANK, N.A. CAPITAL RATIOS MARCH 31, 2011

	March	December	December <u>2009</u>
1. Leverage Ratio	8.96%	8.43%	8.24%
2. Tier I RBC	12.91%	11.57%	9.96%
3. Total RBC	14.16%	12.83%	11.21%