

COMMERCE BANCSHARES INC /MO/
Form 4
March 14, 2005

FORM 4

**UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549**

OMB APPROVAL

OMB Number: 3235-0287
Expires: January 31, 2005
Estimated average burden hours per response... 0.5

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STATEMENT OF CHANGES IN BENEFICIAL OWNERSHIP OF SECURITIES

Filed pursuant to Section 16(a) of the Securities Exchange Act of 1934, Section 17(a) of the Public Utility Holding Company Act of 1935 or Section 30(h) of the Investment Company Act of 1940

(Print or Type Responses)

1. Name and Address of Reporting Person *
BARTH KEVIN G

2. Issuer Name and Ticker or Trading Symbol
COMMERCE BANCSHARES INC /MO/ [CBSH]

5. Relationship of Reporting Person(s) to Issuer

(Check all applicable)

(Last) (First) (Middle)
1000 WALNUT ST., 7TH FLOOR
(Street)

3. Date of Earliest Transaction (Month/Day/Year)
03/11/2005

____ Director _____ 10% Owner
 Officer (give title below) _____ Other (specify below)
Senior Vice President

KANSAS CITY, MO 64106

4. If Amendment, Date Original Filed(Month/Day/Year)

6. Individual or Joint/Group Filing(Check Applicable Line)
 Form filed by One Reporting Person
____ Form filed by More than One Reporting Person

(City) (State) (Zip)

Table I - Non-Derivative Securities Acquired, Disposed of, or Beneficially Owned

1. Title of Security (Instr. 3)	2. Transaction Date (Month/Day/Year)	2A. Deemed Execution Date, if any (Month/Day/Year)	3. Transaction Code (Instr. 8)	4. Securities Acquired (A) or Disposed of (D) (Instr. 3, 4 and 5)	5. Amount of Securities Beneficially Owned Following Reported Transaction(s) (Instr. 3 and 4)	6. Ownership Form: Direct (D) or Indirect (I) (Instr. 4)	7. Nature of Indirect Beneficial Ownership (Instr. 4)
			Code	V Amount (A) or (D) Price			
Common Stock	03/11/2005		M	10,210 A \$ 23.7506	30,295	D	
Common Stock	03/11/2005		M	8,038 A \$ 28.5428	38,333	D	
Common Stock	03/11/2005		M	3,364 A \$ 21.1371	41,697	D	
Common Stock	03/11/2005		M	464 A \$ 15.3094	42,161	D	
Common Stock	03/11/2005		M	3,256 A \$ 15.3094	45,417	D	

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Common Stock	03/11/2005	S	400	D	\$ 47.58	45,017	D
Common Stock	03/11/2005	S	10,654	D	\$ 47.57	34,363	D
Common Stock	03/11/2005	S	1,646	D	\$ 47.56	32,717	D
Common Stock	03/11/2005	S	800	D	\$ 47.53	31,917	D
Common Stock	03/11/2005	S	1,632	D	\$ 47.07	30,285	D
Common Stock	03/11/2005	S	400	D	\$ 47.06	29,885	D
Common Stock	03/11/2005	S	100	D	\$ 47.5	29,785	D
Common Stock	03/11/2005	S	800	D	\$ 47.46	28,985	D
Common Stock	03/11/2005	S	400	D	\$ 47.44	28,585	D
Common Stock	03/11/2005	S	1,800	D	\$ 47.37	26,785	D
Common Stock	03/11/2005	S	1,500	D	\$ 47.36	25,285	D
Common Stock	03/11/2005	S	2,000	D	\$ 47.35	23,285	D
Common Stock	03/11/2005	S	200	D	\$ 47.34	23,085	D
Common Stock	03/11/2005	S	600	D	\$ 47.33	22,485	D
Common Stock	03/11/2005	S	200	D	\$ 47.32	22,285	D
Common Stock	03/11/2005	S	600	D	\$ 47.27	21,685	D
Common Stock	03/11/2005	S	500	D	\$ 47.22	21,185	D
Common Stock	03/11/2005	S	100	D	\$ 47.2	21,085	D
Common Stock	03/11/2005	S	100	D	\$ 47.18	20,985	D
Common Stock	03/11/2005	S	200	D	\$ 47.17	20,785	D
	03/11/2005	S	300	D	\$ 47.13	20,485	D

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Common
Stock

Common Stock 03/11/2005 S 400 D \$ 47.1 20,085 D

Common Stock 9,174 I 401K

Common Stock 4,447 I Exec Comp Plan

Reminder: Report on a separate line for each class of securities beneficially owned directly or indirectly.

Persons who respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

SEC 1474
(9-02)

Table II - Derivative Securities Acquired, Disposed of, or Beneficially Owned
(e.g., puts, calls, warrants, options, convertible securities)

1. Title of Derivative Security (Instr. 3)	2. Conversion or Exercise Price of Derivative Security	3. Transaction Date (Month/Day/Year)	3A. Deemed Execution Date, if any (Month/Day/Year)	4. Transaction Code (Instr. 8)	5. Number of Derivative Securities Acquired (A) or Disposed of (D) (Instr. 3, 4, and 5)	6. Date Exercisable and Expiration Date (Month/Day/Year)	7. Title and Amount of Underlying Securities (Instr. 3 and 4)
				Code	V (A) (D)	Date Exercisable Expiration Date	Title Amount or Number of Shares
Stock Option (right to buy)	\$ 15.3094	03/11/2005		M	464	02/08/1996 02/08/2006	Common Stock 464
Stock Option (right to buy)	\$ 15.3094	03/11/2005		M	3,256	02/08/1996 02/08/2006	Common Stock 3,256
Stock Option (right to buy)	\$ 21.1371	03/11/2005		M	3,364	02/05/1997 02/05/2007	Common Stock 3,364
Stock Option (right to buy)	\$ 23.7506	03/11/2005		M	10,210	02/04/2000 02/03/2010	Common Stock 10,210
	\$ 28.5428	03/11/2005		M	8,038	02/01/1999 02/01/2009	8,038

