#### COMMERCE BANCSHARES INC /MO/

Form 4

December 21, 2005

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

**OMB APPROVAL** 

**OMB** 3235-0287 Number:

January 31, Expires: 2005

Estimated average burden hours per

response... 0.5

Check this box if no longer subject to Section 16.

Form 4 or Form 5 obligations may continue.

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 See Instruction

STATEMENT OF CHANGES IN BENEFICIAL OWNERSHIP OF

**SECURITIES** 

(Print or Type Responses)

1(b).

Stock

Stock

Stock

Stock

Stock

Common

Common

Common

Common

12/19/2005

12/19/2005

12/19/2005

12/19/2005

	1. Name and A KIM CHAR	ddress of Reporting F LES G	Symbol	2. Issuer Name <b>and</b> Ticker or Trading Symbol COMMERCE BANCSHARES INC /MO/ [CBSH]				5. Relationship of Reporting Person(s) to Issuer				
								(Check all applicable)				
(Last) (First) (Middle) 8000 FORSYTH BLVD.			(Month/I	3. Date of Earliest Transaction (Month/Day/Year) 12/19/2005				Director 10% Owner _X Officer (give title Other (specify below)  Executive Vice President				
			12/19/2									
		(Street)		4. If Amendment, Date Original Filed(Month/Day/Year)				6. Individual or Joint/Group Filing(Check Applicable Line)				
CLAYTON, MO 63105								_X_ Form filed by One Reporting Person Form filed by More than One Reporting Person				
	(City)	(State)	(Zip) Tab	le I - Non-D	erivative	Securi	ities Acq	quired, 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. Securi on(A) or Do (Instr. 3,	isposed	d of (D)	5. Amount of Securities Beneficially Owned Following Reported Transaction(s) (Instr. 3 and 4)	6. Ownership Form: Direct (D) or Indirect (I) (Instr. 4)			
	Stock	12/19/2005 <u>(1)</u>		S	500	D	Φ 52.65	18,613	D			

S

S

S

S

573

732

375

5,768

D

D

D

52.65

52.64

\$ 53

18,040

16,933

11,165

\$ 52.7 17,308

D

D

D

D

Common Stock 8,537 I 401K

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

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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)	4. Transactio Code (Instr. 8)	5. orNumber of Derivative Securities Acquired (A) or Disposed of (D)	5	ate Year)	7. Title and Amount of Underlying Securities (Instr. 3 and 4)		8. Price of Derivative Security (Instr. 5)	9. Nu Deriv Secur Bene Owne Follo Repo Trans (Instr
				Code V	(Instr. 3, 4, and 5)  (A) (D)	Date Exercisable	Expiration Date	Title	Amount or Number of Shares		

## **Reporting Owners**

Reporting Owner Name / Address Relationships

Director 10% Owner Officer Other

KIM CHARLES G 8000 FORSYTH BLVD. CLAYTON, MO 63105

**Executive Vice President** 

#### **Signatures**

By: Jeffery Aberdeen For: Charles G. Kim

12/21/2005

\*\*Signature of Reporting Person Date

## **Explanation of Responses:**

- \* If the form is filed by more than one reporting person, see Instruction 4(b)(v).
- \*\* Intentional misstatements or omissions of facts constitute Federal Criminal Violations. See 18 U.S.C. 1001 and 15 U.S.C. 78ff(a).
- (1) Stock holdings adjusted to include 5% stock dividend record date 11/29/05; payable 12/13/05.

Note: File three copies of this Form, one of which must be manually signed. If space is insufficient, *see* Instruction 6 for procedure. Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB number.

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