

Clementi Erich
 Form 4
 November 10, 2010

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 *
 Clementi Erich

2. Issuer Name and Ticker or Trading Symbol
 INTERNATIONAL BUSINESS MACHINES CORP [IBM]

5. Relationship of Reporting Person(s) to Issuer
 (Check all applicable)
 ___ Director ___ 10% Owner
 Officer (give title below) ___ Other (specify below)
 Senior Vice President

(Last) (First) (Middle)
 IBM CORPORATION, ONE NEW ORCHARD ROAD
 (Street)

3. Date of Earliest Transaction (Month/Day/Year)
 11/09/2010

ARMONK, NY 10504

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 Ownership (Instr. 4)		
				Code	V	Amount				(A) or (D)	Price
Common Stock	11/09/2010		M			4,500	A	\$ 112.53	21,094.801	D	
Common Stock	11/09/2010		S			154	D	\$ 146.02	20,940.801	D	
Common Stock	11/09/2010		S			100	D	\$ 146.04	20,840.801	D	
Common Stock	11/09/2010		S			100	D	\$ 146.05	20,740.801	D	
Common Stock	11/09/2010		S			400	D	\$ 146.09	20,340.801	D	

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Common Stock	11/09/2010	S	500	D	\$ 146.1	19,840.801	D
Common Stock	11/09/2010	S	200	D	\$ 146.11	19,640.801	D
Common Stock	11/09/2010	S	200	D	\$ 146.12	19,440.801	D
Common Stock	11/09/2010	S	200	D	\$ 146.13	19,240.801	D
Common Stock	11/09/2010	S	99	D	\$ 146.14	19,141.801	D
Common Stock	11/09/2010	S	200	D	\$ 146.16	18,941.801	D
Common Stock	11/09/2010	S	100	D	\$ 146.17	18,841.801	D
Common Stock	11/09/2010	S	200	D	\$ 146.19	18,641.801	D
Common Stock	11/09/2010	S	100	D	\$ 146.2	18,541.801	D
Common Stock	11/09/2010	S	200	D	\$ 146.21	18,341.801	D
Common Stock	11/09/2010	S	200	D	\$ 146.23	18,141.801	D
Common Stock	11/09/2010	S	200	D	\$ 146.235	17,941.801	D
Common Stock	11/09/2010	S	100	D	\$ 146.24	17,841.801	D
Common Stock	11/09/2010	S	100	D	\$ 146.25	17,741.801	D
Common Stock	11/09/2010	S	300	D	\$ 146.26	17,441.801	D

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	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	6. Date Exercisable and Expiration Date (Month/Day/Year)	7. Title and Amount of Underlying Securities (Instr. 3 and 4)
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