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

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subject to Section 16. Form 4 or Form 5 obligations may continue. See Instruction 1(b).

STATEMENT OF CHANGES IN BENEFICIAL OWNERSHIP OF SECURITIES

Filed pursuant to Section 16(a) of the Securities Exchange Act of 1934 or Section 30(h) of the Investment Company Act of 1940

(Print or Type Respo	nses)														
1. Name and Addres BANK OF AME				2. Issuer Na ADVENT & INCOM	CLAY	MORE (CONV.	•	E SECUR	RITIES	5. Relationship of R Director Officer (give title b	(Check	all applicable) _X_ 10% O		
BANK OF AME TRYON STREE	ERICA COR	rirst) RPORATE CENT		3. Date of Ea 04/21/201		nnsaction (Month/I	Day/Year)							
CHARLOTTE, 1	,	treet)	•	4. If Amendn	nent, Dat	e Original	Filed(Me	onth/Day/Yea	r)		6. Individual or JoinForm filed by One Re _X_Form filed by More t	porting Person	<u> </u>	e Line)	
(City)		State)	(Zip)			Ta	ıble I - I	Non-Deriv	ative Secur	ities Acq	uired, Disposed of, or	· Beneficiall	y Owned		
1.Title of Security (Instr. 3)			2. Transaction Date (Month/Day/Yea	2A. Deen Execution ar) any (Month/E	n Date, if	(Instr. 8)		or Disp	rities Acqui losed of (D) 3, 4 and 5)		5. Amount of Securiti Following Reported T (Instr. 3 and 4))		7. Nature of Indirect Beneficial Ownership
				(Month/L	Jay/1 ear,	Code	· V	Amour	(A) or (D)	Price				or Indirect (I) (Instr. 4)	
Common Stock			04/21/2011			P		625	A	\$ 19.67	625				By Subsidiary
Common Stock			04/21/2011			S		625	11)	\$ 19.18	0				By Subsidiary
Reminder: Report or	ı a separate lin	e for each class of sec	curities beneficiall	y owned dire	ctly or in	directly.	for	n are no		to respo	collection of information			SE	C 1474 (9-02)
			Table	e II - Derivat (e.g., pt					f, or Benefi ible securiti		vned				
1. Title of Derivative Security (Instr. 3)	2. Conversion or Exercise Price of Derivative Security	onversion Exercise ice of erivative Date (Month/Day/Year) Ex any (M	3A. Deemed Execution Date, is any (Month/Day/Year	if Code (Instr. 8) De Se (A		ecurities Acquired (a) or Disposed of		and Expi			le and Amount of rlying Securities . 3 and 4)	8. Price of Derivative Security (Instr. 5)	Securities Beneficially Owned Following	Ownership Form of Derivative Security: Direct (D)	11. Nature of Indirect Beneficial Ownership (Instr. 4)
				Code	v	(A)	(D)	Date Exercisal	Expiration Date	on Title	Amount or Number of Shares		Reported Transaction(s (Instr. 4)	or Indirec (I) (Instr. 4)	t
Reporting	Owners	S													

BANK OF AMERICA CORPORATE CENTER 100 N. TRYON STREET CHARLOTTE, NC 28255	Relationships					
	Director	10% Owner	Officer	Other		
BANK OF AMERICA CORP /DE/ BANK OF AMERICA CORPORATE CENTER 100 N. TRYON STREET CHARLOTTE, NC 28255		X				
MERRILL LYNCH, PIERCE, FENNER & SMITH INC. 4 WORLD FINANCIAL CENTER NORTH TOWER NEW YORK, NY 10080		X				

Signatures

Bank of America Corporation, By: /s/ Beth Dorfman, Authorized Signatory	05/13/2011
**Signature of Reporting Person	Date
Merrill Lynch, Pierce, Fenner & Smith Incorporated, By: /s/ Lawrence Emerson, Title: Attorney-In-Fact	05/13/2011
**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).

Remarks:

The transactions reported on this Form 4 were effected by Merrill Lynch, Pierce, Fenner & Smith Incorporated, an indirect, wholly owned subsidiary of Bank of America Corporation.

Disgorgement of profits, if applicable, based on transactions reported above is being made by the Reporting Persons to the Issuer.

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.