FORM 4

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

OMB APPRO	VAL				
OMB Number:	3235-0287				
Estimated average burden					
nours per response	0.5				

Check this box if no longer 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

	pe Response													
1. Name and Address of Reporting Person* PETERS AULANA L			2. Issuer Name and Ticker or Trading Symbol MERRILL LYNCH & CO INC [MER]					5	5. Relationship of Reporting Person(s) to Issuer (Check all applicable) X Director 10% Owner					
(Last) (First) (Middle) C/O MERRILL LYNCH & CO., INC., 4 WORLD FINANCIAL CENTER			3. Date of Earliest Transaction (Month/Day/Year) 03/31/2005					-		give title below) Oth	er (specify below	v)	
(Street) NEW YORK, NY 10080				4. If Amendment, Date Original Filed(Month/Day/Year)						6. Individual or Joint/Group Filing(Check Applicable Line) _X_Form filed by One Reporting PersonForm filed by More than One Reporting Person				
(City		(State)	(Zip)	Table I - Non-Derivative Securities Acquired, Disposed of, or Beneficially Owned					ıed					
1.Title of S (Instr. 3)	Security			2A. Deemed Execution Date any (Month/Day/Ye			(A	4. Securities Acquired (A) or Disposed of (D) (Instr. 3, 4 and 5)		Beneficially	f Securities Owned Foliansaction(s)	Fo	Ownership of orm:	7. Nature of Indirect Beneficial Ownership
				(Coc	ie V A	mount (A)	or	mstr. 3 and 4)		0	()	Instr. 4)
Reminder:							contain		orm are n	ot require	d to respo	nd unless th		474 (9-02)
Reminder:							contair form di uired, Dispo	ed in this f splays a cu	orm are n irrently va	ot require alid OMB o	d to respo	nd unless th		1/4 (9-02)
1. Title of	2. Conversion or Exercise Price of Derivative Security	*****	3A. Deemed Execution Date, i	4. Transac Code	tion Sec Acc (A) Dis of (Ins	mber ivative urities quired or posed D) str. 3,	contair form di uired, Dispo , options, co 6. Date Exand Expira (Month/Da	ed in this the splays a curbosed of, or Burnertible servisable tion Date	orm are n irrently va	Owned Id Amount	d to respondent of the second	nd unless th	10. Ownershi Form of Derivative Security: Direct (D) or Indirec	11. Nature of Indires Beneficial Ownersh (Instr. 4)
1. Title of Derivative Security	Conversion or Exercise Price of Derivative	Date	3A. Deemed Execution Date, i	4. Transac Code	tion Sec Acc (A) Dis of (Ins	mber vivative urities quired or posed D) str. 3, nd 5)	contair form di uired, Dispo , options, co 6. Date Exand Expira (Month/Da	ed in this t splays a cu sed of, or B nvertible se ercisable tion Date y/Year)	eneficially curities) 7. Title an of Underly Securities (Instr. 3 an	Owned Id Amount	8. Price of Derivative Security	9. Number of Derivative Securities Beneficially Owned Following Reported Transaction(s	10. Ownershi Form of Derivative Security: Direct (D' or Indirec	11. Nature of Indire Beneficie Ownersh (Instr. 4)

Reporting Owners

	Relationships				
Reporting Owner Name / Address	Director	10% Owner	Officer	Other	
PETERS AULANA L C/O MERRILL LYNCH & CO., INC. 4 WORLD FINANCIAL CENTER NEW YORK, NY 10080	X				

Signatures

Aulana L. Peters (by Michael A. LaMaina, as agent)	04/04/2005
**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).
- The reporting person participates in the Merrill Lynch & Co., Inc. Fee Deferral Plan for Non-Employee Directors (the "Fee Deferral Plan"), under which these ML Stock Units were (1) credited. Transactions under the Fee Deferral Plan are exempt under Rule 16b-3. The value of each unit is equal to the value of one share of Merrill Lynch & Co., Inc. Common Stock. ML Stock Units are payable in cash at the end of the deferral period as provided in the Fee Deferral Plan.
- (2) 1 for 1

Remarks:

All reported positions have been rounded down to the nearest whole number.

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.