

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

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INITIAL STATEMENT OF 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 Responses)						
1. Name and Address of Reporting Person [*] LAUGHLIN TERRENCE P	2. Date of Event Requirin Statement (Month/Day/Yo 02/04/2011	0	3. Issuer Name and Ticker or Trading Symbol BANK OF AMERICA CORP /DE/ [BAC]			
(Last) (First) (Middle) 100 NORTH TRYON STREET	02/04/2011	Issuer	of Reporting Person(s)) to 5. If Amendment, Date Original Filed(Month/Day/Year)		
(Street) CHARLOTTE, NC 28255		Director X Officer (give below)	k all applicable) ittle 0/wner Other (specify below) set Servicing Executi	_X_Form filed by One Reporting Person		
(City) (State) (Zip)	Table I - Non-Derivative Securities Beneficially Owned					
1. Title of Security (Instr. 4)		ount of Securities cially Owned 4)	1	Nature of Indirect Beneficial Ownership 1str. 5)		
5	Benefic	cially Owned 4)	Form: Direct (Ir (D) or Indirect (I)	1		

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

SEC 1473 (7-02)

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

Instr. 4)			3. Title and Amount of Securities Underlying Derivative Security (Instr. 4)		4. Conversion or Exercise Price of Derivative	Derivative Security:	6. Nature of Indirect Beneficial Ownership (Instr. 5)
	Date Exercisable	Expiration Date	Title	Amount or Number of Shares	Security Direct (D) or Indirect (I) (Instr. 5)		
Restricted Stock Units	<u>(1)</u>	01/31/2012	Common Stock	6,524	\$ 0	D	
Restricted Stock Units	<u>(2)</u>	08/02/2013	Common Stock	394,549	\$ 0	D	

Reporting Owners

	Relationships					
Reporting Owner Name / Address	Director	10% Owner	Officer	Other		
LAUGHLIN TERRENCE P 100 NORTH TRYON STREET CHARLOTTE, NC 28255			Legacy Asset Servicing Executi			

Signatures

Terrence P. Laughlin/Roger C. McClary POA

02/11/2011 Date

Explanation of Responses:

- * If the form is filed by more than one reporting person, see Instruction 5(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) These restricted stock units, which are exempt under Rule 16b-3(d), vest in four equal annual installments commencing on January 31, 2009.
- (2) These restricted stock units, which are exempt under Rule 16b-3(d), vest in three equal annual installments commencing on the first anniversary of the grant date.

Note: File three copies of this Form, one of which must be manually signed. If space is insufficient, See Instruction 6 for procedure.

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