



INVESTMENT MANAGEMENT

Form of Adherence Letter

October 7, 2008

International Swaps and Derivatives Association, Inc.
Send to: LehmanProtocol@isda.org

Dear Sirs,

2008 Lehman CDS Protocol - Adherence

The purpose of this letter is to confirm our adherence to the 2008 Lehman CDS Protocol, as published by the International Swaps and Derivatives Association, Inc. on October 6, 2008 (the "**Protocol**"). This letter constitutes an "Adherence Letter" as referred to in the Protocol.

The definitions and provisions contained in the Protocol are incorporated into this Adherence Letter, which will supplement and form part of each Covered Transaction (now or in the future) between us and each other Adhering Party.

1. Specified Terms

The amendments in Section 1 and Schedule 1 of this Protocol shall apply to Covered Transactions to which we are a party.

2. Appointment as Agent and Release

We hereby appoint ISDA as our agent for the limited purposes of the Protocol and accordingly we waive, and hereby release ISDA from, any rights, claims, actions or causes of action whatsoever (whether in contract, tort or otherwise) arising out of, or in any way relating to, this Adherence Letter or our adherence to the Protocol or any actions contemplated as being required by ISDA.

3. DTCC Account Number

For purposes of electronic matching and counterparty recognition, our DTCC Account Number is as follows, but you understand and agree that our failure to provide any such details pursuant to this letter will not affect the legal validity and binding nature of the Protocol with respect to us:

DTCC Account Number: **See the attached Exhibit A.**

4. Contact Details

Our contact details for purposes of this Adherence Letter are:

Name: Armand Aponte, Vice President and Counsel
Address: 230 Park Avenue, 14th Floor
New York, NY 10169
Telephone: 212-309-1777
Fax: 212-309-8321
E-mail: Armand.Aponte@inginvestment.com

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We consent to the publication of the conformed copy of this letter by ISDA and to the disclosure by ISDA of the contents of this letter.

Yours faithfully,

ING Investment Management LLC, acting on behalf of the accounts listed on Exhibit A and in the relevant Master Agreement between it and another Adhering Party.

By: James M. Fink

Name: James M. Fink

Title: Senior Vice President

EXHIBIT A
LIST OF ACCOUNTS

DTCC No.	Fund Name
0000S082	ING Financial Products Company, Inc.
00002P35	ING Life Insurance and Annuity Company
00002P36	ING USA Annuity and Life Insurance Company
00002940	ReliaStar Life Insurance Company
00002P41	ReliaStar Life Insurance Company of New York
00002P42	Security Life of Denver Insurance Company