

Form of Adherence Letter

October 16, 2008

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

Dear Sirs,

2008 Washington Mutual CDS Protocol - Adherence

The purpose of this letter is to confirm our adherence to the 2008 Washington Mutual CDS Protocol, as published by the International Swaps and Derivatives Association, Inc. on October 15, 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:

Telephone: 212-309-1777

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

230 Park Avenue, 14th Floor New York, NY 10169 USA International Swaps and Derivatives Association, Inc.

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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 Co., acting on behalf of ING Investments, LLC as Agent for the funds 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 |
|----------|--|
| 00008P43 | ING Balanced Fund |
| 00005L02 | ING Global Bond Fund |
| 00008P47 | ING Intermediate Bond Fund |
| 0000990L | ING SPorts Core Plus Fixed Income Fund |
| 00008P58 | ING VP Balanced Portfolio, Inc. |
| 00008P60 | ING VP Intermediate Bond Portfolio |