

Form of Adherence Letter

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December 18, 2008

International Swaps and Derivatives Association, Inc.  
Send to: [TribuneProtocol@isda.org](mailto:TribuneProtocol@isda.org)

Dear Sirs,

**2008 ISDA Tribune CDS Protocol - Adherence**

The purpose of this letter is to confirm our adherence to the 2008 Tribune CDS Protocol, as published by the International Swaps and Derivatives Association, Inc. on December 16, 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, respectively.

**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 Appendix 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, 14<sup>th</sup> Floor  
New York, NY 10169  
Telephone: 212-309-1777  
Fax: 212-309-8321  
E-mail: [Armand.Aponte@inginvestment.com](mailto:Armand.Aponte@inginvestment.com)

**International Swaps and Derivatives Association, Inc.**

**Send to: TribuneProtocol@isda.org**

December 18, 2008

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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 Appendix 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

Attachment

**APPENDIX A**

**LIST OF ACCOUNTS**

<b>DTCC No.</b>	<b>Fund Name</b>
00002P35	ING Life Insurance and Annuity Company
00002P36	ING USA Annuity and Life Insurance Company
00002940	ReliaStar Life Insurance Company
00002P42	Security Life of Denver Insurance Company