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February 23, 1999

Top Hat Plan Exemption
Pension & Welfare Benefits
Administration
Room N-5644
U.S. Department of Labor
200 Constitution Avenue, N.W.
Washington, D.C. 20210

To Whom It May Concern:

ING North America Insurance Corporation, EIN 52-1317217, 5780 Powers Ferry Road, N.W., Atlanta, Georgia 30327, maintains a plan primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees, such plan being identified as the ING FSI U.S. Deferred Compensation Plan, established and effective January 1, 1999, with 200 eligible individuals as of that date. The following list of companies are also participating employers in the Plan, all being affiliated companies with ING North America Insurance Corporation.

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|---|------------|
| Equitable Life Insurance Company of Iowa | 42-0236150 |
| Locust Street Securities, Inc. | 42-0938487 |
| Golden American Life Insurance Company | 41-0991508 |
| First Golden American Life Insurance Company of New York | 13-3919096 |
| Security Life of Denver Ins. Co. | 84-0499703 |
| ING Investment Management LLC | 58-1515059 |
| Southland Life Ins. Co. | 75-0572420 |
| Life Insurance Company of Georgia | 58-0298930 |
| ING America Insurance Holdings, Inc. | 02-0333654 |

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| VESTAX Securities Corporation | 34-1348311 |
| Investment Mgmt. Inc. | 58-2361003 |
| First ING Life Insurance Co. of New York | 13-2740556 |
| MIA Office Americas, Inc. | 58-2177672 |
| IFG Services, Inc. | 58-1868805 |
| Compulife, Inc. | 54-1252522 |
| Compulife Agency, Inc. | 34-1689987 |
| Compulife Investor Services, Inc. | 54-1439322 |

The benefits for the above named Plan are paid as needed solely from the general assets of the respective participating employer of each participant.

Yours very truly,



Terry C. Hancock, on behalf of
ING North America Insurance
Corporation

TCH/br
cc: Deborah Holden
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