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January 17, 2001

Top Hat Plan Exemption
Pension and Welfare Benefits Administration
Room N-5638
U.S. Department of Labor
200 Constitution Avenue N.W.
Washington, DC 20210

Re: Delinquent Filer Voluntary Compliance Program for "Top-Hat" Plan
Plan: ING (U.S.) Financial Holdings Corporation Supplemental Executive
Retirement Plan for Long-Standing Highly Compensated Employees
Employer: ING (U.S.) Financial Holdings Corporation
EIN: 13-3713590

Dear Sir/Madam:

Under the Department of Labor's Delinquent Filer Voluntary Compliance (DFVC) Program, and as provided under 29 C.F.R. § 2520.104-23 of the regulations issued under Section 104 of the Employee Retirement Income Security Act of 1974, as amended, this letter serves as notice that this employer maintains a "top-hat" plan as to which this filing applies:

- primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees; and
- under which benefits are paid solely from the general assets of the employer.

The name of the "top-hat" plan is the ING (U.S.) Financial Holdings Corporation Supplemental Executive Retirement Plan for Long-Standing Highly Compensated Employees. This plan covers 17 employees. The address of the employer is as follows:

ING (US) Financial Services Corporation
55 East 52nd Street
31st Floor
New York, NY 10055

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A copy of the above-referenced plan will be provided to the Secretary of Labor upon request.

Sincerely yours,

Amy L. LaBelle

ALL:djb
Enclosure

cc: Jonathan B. Dubitzky, Esq.