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ING Asia Pacific High Dividend Equity Income Fund Form 3

October 26, 2009

FORM 3

UNITED STATES SECURITIES AND EXCHANGE COMMISSION Washington, D.C. 20549

OMB APPROVAL

OMB Number:

3235-0104

Expires:

January 31, 2005

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INITIAL STATEMENT OF BENEFICIAL OWNERSHIP OF SECURITIES

Filed pursuant to Section 16(a) of the Securities Exchange Act of 1934, Section 17(a) of the Public Utility Holding Company Act of 1935 or Section 30(h) of the Investment Company Act of 1940

(Print or Type Responses)

1. Name and Address of Reporting 2. Date of Statement Bailey Grant Andrew (Month/Da				ent Requiring Year)	ING Asia Pacific High Dividend Equity Income Fund						
(Last)	(First)	(Middle)	10/13/2009	The state of the s	[IAE] 4. Relationship of Reporting Person(s) to Issuer				5. If Amendment, Date Original		
39/F ONE INTERNATIONAL FINANCIAL CENTRE, 1 HARBOUR VIEW STREET (Street)					(Check all applicable) Director 10% Owner OfficerX Other (give title below) (specify below) Director (See remarks)			Filed(Month/Day/Year) 6. Individual or Joint/Group Filing(Check Applicable Line) _X_ Form filed by One Reporting			
CENTRAL, KONG	K3 H0	ONG							Person Form filed by More than One Reporting Person		
(City)	(State)	(Zip)		Table I - N	on-Deriva	ative S	ecuritie	es Be	neficially Owned		
1.Title of Secur (Instr. 4)	rity			2. Amount of Beneficially (Instr. 4)		Form Direc	ership a: et (D) direct	4. Nat Owne (Instr.	•		
No Securities Beneficially owned (directly or Indirectly)				0		D Â		Â			
Reminder: Repo			ach class of secu	urities benefici	ially	SEC 14	73 (7-02)				
	infor	mation conta	pond to the cained in this f	orm are not							

Table II - Derivative Securities Beneficially Owned (e.g., puts, calls, warrants, options, convertible securities)

currently valid OMB control number.

1. Title of Derivative Security	2. Date Exercisable and	3. Title and Amount of	4.	5.	6. Nature of Indirect
(Instr. 4)	Expiration Date	Securities Underlying	Conversion	Ownership	Beneficial Ownership
	(Month/Day/Year)	Derivative Security	or Exercise	Form of	(Instr. 5)

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		(Instr. 4)		Price of	Derivative
Date Exercisable	Expiration Date	Title	Amount or Number of Shares	Derivative Security	Security: Direct (D) or Indirect (I) (Instr. 5)

Reporting Owners

Reporting Owner Name / Address	Relationships				
	Director	10% Owner	Officer	Other	
Bailey Grant Andrew 39/F ONE INTERNATIONAL FINANCIAL CENTRE				Director (See	
1 HARBOUR VIEW STREET	Â	Â	Â	Director (See remarks)	
CENTRAL, K3 HONG KONG					

Signatures

/s/ Grant Andrew
Bailey

**Signature of Reporting
Person

Date

Explanation of Responses:

- * If the form is filed by more than one reporting person, see Instruction 5(b)(v).
- ** Intentional misstatements or omissions of facts constitute Federal Criminal Violations. See 18 U.S.C. 1001 and 15 U.S.C. 78ff(a).

Â

Remarks:

Director, ING Investment Management Asia Pacific (Hong Kong)Â Limited

Note: File three copies of this Form, one of which must be manually signed. If space is insufficient, *See* Instruction 6 for procedure. Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB number.

Reporting Owners 2