



Important Account Information ING Financial Advisers, LLC



Your future. Made easier.®

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1. Procedures for Opening a New Account

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. What this means for you: When you open an account, we will ask for your name, address, date of birth and other information that will allow us to identify you. We may ask to see your driver's license or other identifying documents.

2. ING's Privacy Promise

ING is committed to protecting the privacy and confidentiality of your personal information.

As providers of products and services that involve compiling personal—and sometimes, sensitive—information, protecting the confidentiality of that information has been, and will continue to be, a top priority throughout the ING companies.

Whether you are a current customer, former customer, or potential customer, we believe that you should know about the information we collect, the measures we take to safeguard it, and the limited circumstances in which we may share your information.

We collect only the customer information necessary to consistently deliver responsive products and services.

The information we collect and the extent to which we use it will vary depending on the product or service involved.

The ING companies collect information that helps serve your financial needs; provide high levels of customer service; develop and offer new products or services for

our customers and potential customers; and fulfill legal and regulatory requirements.

The information collected generally varies depending on the products or services you request and may include:

- Information provided on applications and related forms—for example, name, age, address, Social Security number, and annual income.
- Responses from your employer, benefit plan sponsor, or association regarding any group products we may provide—for example, name, age, address, Social Security number, and annual income.
- Third-party reports, such as consumer credit history, motor vehicle records, demographic and/or medical information, if relevant to your product or service.
- Information about your relationship with us, such as products or services purchased, and account balances.

We maintain safeguards to protect privacy and information security.

We have implemented security standards and processes—including physical, electronic and procedural safeguards. We limit access to customer information to employees, registered representatives or agents who may need it to do their job. These individuals are trained to respect the confidentiality of your personal information and understand their duty to safeguard it.

We restrict the sharing of customer information with anyone — even our affiliates — for use in marketing.

First and foremost, we do not sell or share customer information with outside parties who want to market their products to you.

As a provider of a wide variety of financial products and services, we may identify opportunities to enhance customer service or to offer you additional products and services offered by other ING companies.

However, an ING company will not share information about you with another ING company that could be used to make insurance underwriting or lending decisions about you, unless you direct us to or unless we notify you first and give you a chance to say no.

In addition, an ING company will not use certain personal information (such as income, account history or credit history) received from another ING company in order to market its products or services to you unless you direct us to, or unless we notify you first and give you a chance to say no.

Similarly, we will not share personal information with third-party financial services entities, such as banks, credit unions, credit union service corporations, insurance companies, or securities broker-dealers, for purposes of joint marketing unless you direct us to, or unless we notify you first and give you a chance to say no.

We share customer information as necessary for business, regulatory, and servicing purposes.

We will share customer information to facilitate or service a transaction you have requested, but only in accordance with federal or state law. For example:

- When you apply for a life insurance product, the ING life insurance companies may use a common application to avoid multiple medical tests. In this way, the information you provide and authorize us to obtain may subsequently be used by one or

all of these companies as necessary to determine—and offer to you—the product most appropriate for your needs.

- In some cases, your information (for example, name, address, age, and Social Security number) may be provided to other ING companies such as our securities broker-dealers, our insurance companies and agencies, or our banks to process or service a transaction you have requested or to facilitate enhanced customer service.
- We may share or exchange information with companies engaged to work with us, such as third-party administrators and vendors hired to effect, administer or enforce a transaction that you request or authorize; to develop or maintain software; to perform marketing research; or to provide us with demographic information to develop marketing plans. We require these companies to maintain the confidentiality of customer information and use it only for the purpose for which it was provided.
- We may provide information to reputable consumer reporting agencies in connection with your application or renewal of insurance coverage.

We may also share customer information in accordance with, or as required by, law or regulation (for example, in response to a subpoena, to prevent fraud, and to comply with rules of, or inquiries from, industry regulators)

In a few cases, an ING company not listed in this notice may have a privacy policy that differs from the one stated in this notice. If that is the case, you will receive a separate privacy notice from that ING business if you are a customer.

In addition, the agent or registered representative with whom you work to obtain ING financial products and services may use the personal information about you in his or her own files to advise you of other products or to help you with your overall financial strategy.

We will reaffirm this policy annually in writing, as long as you maintain an ongoing relationship with any of the ING companies listed below. While this policy may change from time to time, you can always review our current policy online at www.ing.com/us.

In this notice, the words "you" and "customer" are used to mean any individual who obtains or has obtained a financial product or service from an ING company that is to be used primarily for personal, family, or household purposes.

Following is a list of the ING companies that this notice applies to, as of February 1, 2010:

- Directed Services LLC
- ING America Equities, Inc.
- ING America Insurance Holdings, Inc.
- ING Capital Corporation, LLC
- ING Financial Advisers, LLC
- ING Funds Distributor, LLC
- ING Funds Services, LLC
- ING Institutional Plan Services, LLC
- ING Investment Advisors, LLC
- ING Investment Management Co.
- ING Investment Management LLC
- ING Investment Trust Co.
- ING Investments, LLC
- ING Life Insurance and Annuity Company
- ING National Trust
- ING USA Annuity and Life Insurance Company
- Midwestern United Life Insurance Company
- ReliaStar Life Insurance Company
- ReliaStar Life Insurance Company of New York
- Security Life Assignment Corporation
- Security Life of Denver Insurance Company

3. Information About Your Account

In signing the Client Account form, you acknowledge the following statements to be true and accurate to the best of your knowledge.

- You acknowledge that you have received and reviewed this Important Account Information Booklet.
- You are at least 18 years of age and of full legal age in the state where you reside.
- Your Registered Representative provided you with current, complete, unaltered prospectuses, and discussed with you information pertaining to illiquidity, contract charges and expenses, potential surrender charges and/or IRS penalties, market risk and the potential for values to fluctuate, breakpoints, classes of shares, Rights of Accumulation, and any applicable state and/or local government premium taxes.
- If you are purchasing a variable annuity for an Individual Retirement Account, 401(k), or other tax-qualified plan, you understand that the tax deferred feature of the variable annuity is unnecessary. You are using the variable annuity contract to take advantage of the other features; guaranteed death benefit, and guaranteed lifetime payout option.
- If the balance in the Brokerage Sweep Account is insufficient to pay fees owed in connection with the servicing of the Brokerage Account, such fees will be deducted from your assets held in your Brokerage Account.
- Replacing an existing Life Insurance or Annuity Contract with a new one may not be in your best interest. You should consider changes in health and age, new sales loads or charges

and other expenses on the new Contract, minimum interest guarantees, features of the new Contract that you pay for but do not need, loss of favorable provisions or “grandfathered” features on the existing Contract, mortality table assumptions, and possible tax consequences.

- You understand that YOUR ACCOUNT IS SUBJECT TO A PREDISPUTE ARBITRATION CLAUSE THAT IS FULLY SET FORTH BELOW.

Predispute Arbitration Clause

This account is subject to the arbitration rules of the Financial Industry Regulatory Authority (FINRA).

By signing the Client Account Form, the parties (you and ING Financial Advisers) agree as follows:

- All parties to this agreement are giving up the right to sue each other in court, including the right to a trial by jury, except as provided by the rules of the arbitration forum in which a claim is filed.
- Arbitration awards are generally final and binding; a party's ability to have a court reverse or modify an arbitration award is very limited.
- The ability of the parties to obtain documents, witness statements and other discovery is generally more limited in arbitration than in court proceedings.
- The arbitrators do not have to explain the reason(s) for their award.
- The panel of arbitrators will typically include a minority of arbitrators who were or are affiliated with the securities industry.
- The rules of some arbitration forums may impose time limits for bringing a claim in arbitration. In some cases, a claim that is

ineligible for arbitration may be brought in court.

- The rules of the arbitration forum in which the claim is filed, and any amendments thereto, shall be incorporated into this agreement.
- No person shall bring a putative or certified class action to arbitration, nor seek to enforce any predispute arbitration agreement against any person who has initiated in court a putative class action; or who is a member of a putative class action who has not opted out of the class with respect to any claims encompassed by the putative class action until: (i) the class certification is denied; or (ii) the class is decertified; or (iii) the customer is excluded from the class by the court. Such forbearance to enforce an agreement to arbitrate shall not constitute a waiver of any rights under this agreement except to the extent stated herein.

Complaints

To submit a complaint, please contact ING Financial Advisers, LLC at One Orange Way, Windsor, CT 06095-4774 or call 1-800-238-6223, Option 1.

Financial Industry Regulatory Authority (FINRA) Investor Education and Protection

An investor brochure that includes information describing FINRA BrokerCheck may be obtained from FINRA. The FINRA BrokerCheck Hotline Number is (800)289-9999. The FINRA Regulation Web site address is www.finra.org.

Account Agreement Disclosure Supplement

ING Financial Advisers, LLC (“ING Financial Advisers”), through your registered representative, makes a wide variety of mutual funds and

variable insurance products, including annuities, available to you. You pay either a sales charge when you purchase your investments (such as for Class A shares of a mutual fund), or the sales charge may be built into the expenses of the product and/or charged to you when you sell (such as for Class B shares of a mutual fund). Under certain circumstances, sales charges may be reduced or waived, including, for example, on rollovers from your existing ING products to new ING products. ING Financial Advisers is paid by the product issuer or its affiliates, and part of that payment goes to your registered representative.

Your sales charges and expenses, and the sales commissions paid to us and our representatives, differ from investment to investment, and may depend on the amount of money you invest. Some product issuers or their affiliates occasionally also offer “commission specials” which increase the sales commissions paid to us and our representatives. Sales charges, and information about expenses, are explained in the product's prospectus. Generally speaking, investors buying the same product for the same kind of investment account with the same investment amount pay the same sales charge. This is true regardless of the broker-dealer and registered representative through which the investment is purchased.

Your representative may receive extra compensation for sales of ING products. ING Financial Advisers may share with registered representatives and/or managers a greater percentage of the compensation it receives on ING products. In addition, ING Financial Advisers may also pay registered representatives who are life insurance agents bonuses and/or benefits based on sales of ING variable life and annuity products.

Certain rollover products are offered by phone representatives of ING Financial Advisers who are salaried, non-commissioned employees ("IST Representatives"). You should know, however, that sales of rollover products produced by IST Representatives do generate commission payments to the broker of record for the existing ING product. Where that is the case, ING Financial Advisers and the broker of record may enter into rules of engagement that govern how rollover sales opportunities will be allocated between the IST Representatives and the broker of record. Typically, low balance rollover opportunities are allocated to the IST Representatives and higher balance opportunities are allocated to the broker of record. ING Financial Advisers, through its IST Representatives, concentrates its sales efforts on certain proprietary products. Alternative products are available through other distributors.

Product sponsors may at times send ING Financial Advisers payments in recognition of our sales and marketing efforts, and may have additional opportunities to provide marketing services to our representatives. Also, product sponsors may pay marketing allowances to ING Financial Advisers in connection with the sale of insurance products. Product Sponsors may also reimburse up to 100% of the cost of training and education meetings for our representatives, as permitted by industry rules. Sales of any products by ING Financial Advisers representatives may qualify representatives for additional cash and non-cash compensation that may include support for their business activities, attendance at seminars, conferences, award trips, merchandise, gifts, prizes and entertainment.

Additionally, some investments may pay higher rates of compensation than others. Further, some of ING Financial Advisers' home office

management and certain other employees may receive a portion of their employment compensation based on sales of products of ING affiliates or for supplying plan termination information to ING Financial Advisers representatives in order to support asset retention.

4. Purchase Information

Client understands that it is his/her responsibility to read the applicable prospectus thoroughly and understand it and to pay particular attention to the following items as they apply to the account investment objectives:

- Purpose of Investment
- Tax Considerations
- Time Frame for Investing
- Commissions/Sales Charges
- Risk Tolerance
- Current Investments

This investment is subject to investment risks as described in the prospectus.

This investment is subject to price fluctuations that may result in a market value higher or lower than the original investment. Past performance is not necessarily indicative of future results.

5. Investment Objectives

The descriptions below apply to the Investment Objective(s) available for your account.

- *Capital Preservation*
For investors who favor conservative investment options that seek – but not necessarily guarantee – to hold the principal value of an investment stable through all market conditions. An Investment Objective of Stability of Principal is typically selected by investors with a conservative risk tolerance.
- *Income*
For investors primarily seeking income or growth of income, with less emphasis on capital appreciation. The risk tolerance of investors with an Investment Objective of Income may range

from aggressive (who may seek below investment grade bonds ("high yield bonds")) to moderate (who may seek income producing investments such as investment grade corporate bonds, mortgages, government bonds and, to a lesser degree, preferred stock, foreign or convertible bonds), to conservative (who may seek Treasury Bills and other highly-rated, short term securities).

- *Growth & Income*
For investors seeking long-term growth of capital or a combination of growth and income by investing primarily in stocks of larger, mature companies; or by investing in a combination of stocks and bonds, generally in a 60/40 proportion. An Investment Objective of Growth & Income is typically selected by investors with a moderate risk tolerance.
- *Growth*
For investors seeking long-term growth of capital, primarily in stocks of larger U.S. companies. An Investment Objective of Growth is typically selected by investors with a moderate or aggressive risk tolerance.
- *Aggressive Growth*
For investors seeking capital appreciation by investing primarily in stocks of small and medium sized companies with above average earning growth potential. Due to their smaller size, these companies may face greater business risk. An Investment Objective of Aggressive Growth is typically selected by investors with an aggressive risk tolerance.
- *Speculative*
For investors seeking to obtain higher than average returns in exchange for higher than average risk. Such investors may seek to invest in categories such as speculative stock and stock

options, low-rated debt securities, precious metals, commodities and futures, speculative limited partnerships and/or speculative mutual funds. An Investment Objective of Speculation is typically selected by investors with an aggressive risk tolerance.

6. Information on Replacing or Switching Investment Products (Applicable to clients exchanging one investment for another)

1. You understand that the decision to make an exchange should be made only on the basis of:

- A full understanding of the insurance, annuity, general securities or mutual funds products involved, (as described in the respective contracts, prospectuses, prospectus summaries, available research information and/or statements of additional information), and
- Your particular circumstances. You and your representative have discussed the advantages and disadvantages of the new purchase as compared to your current investment, including consideration and comparison of any new and old sales charges, mutual fund or separate account fees and expenses, and mortality and expense charges if any.

2. If the investment being sold is a mutual fund you realize that:

- You may be able to exchange funds within the fund family without incurring a sales load.
- You should compare the fund expenses associated with different share classes, and available discounts for quantity purchases.
- If your transaction is an exchange of A-shares you have indicated to your representative that 1) you are making the exchange at Net Asset Value or 2) you have elected to pay new sales charges on the purchased shares.

3. If replacing an existing life insurance or annuity contract with a new one or with a new type of product, you have considered the possible unfavorable changes in health and age and new sales loads or charges in the new contract, loss of favorable provisions on the existing contract, mortality table assumptions, life income guarantees and tax consequences.

4. You have determined, as a result of the exchange, whether your investment risk is increased, decreased or about the same.

5. You have reviewed the investment objective of the new purchase and find it more suitable to your financial objectives than the one you currently own. You realize that there may be funds available from your current product provider that may be exchanged without charge.

6. Any profit realized on the sale of the investment being sold may be subject to taxation when liquidated. For retirement accounts, there may be federal income tax penalties for withdrawals before age 59½.

7. (ING Defined Contribution customers only.) You realize that there might be products available from your current provider that are specifically designed for rollovers from ING Defined Contribution assets and offer exchanges at potentially lower fees and expenses.

8. Your representative has indicated to you the primary reason(s) for recommending the new purchase.

9. You have indicated why the existing investment cannot meet your objectives.

7. Mutual Fund Disclosure (Applicable to Mutual Fund Purchasers)

When considering mutual funds, it is important that investors understand the sales charges,

expenses, and management fees that will be charged, as well as the breakpoint discounts to which you may be entitled. Most mutual funds offer different share classes, which invest in the same portfolio of securities, but have different expense structures. Likewise, different classes of shares may result in different sales compensation paid to broker/dealers and their registered representatives. Understanding the sales charges and breakpoint discounts offered will assist in identifying the most appropriate investment for your particular needs and may help reduce the cost of your investment. It is important that investors discuss the differences between share classes, management fees, expense structures, and breakpoint opportunities associated with each mutual fund with their registered representative. Investors should also review the mutual fund's prospectus and statement of additional information. If you wish to learn more about mutual fund share classes or mutual fund breakpoints, you may wish to review the FINRA investor alerts (www.finra.org/InvestorInformation/InvestorAlerts/MutualFunds/UnderstandingMutualFundClasses/index.htm) or visit the many mutual fund websites available to the public.

Class A Shares

- May impose a front-end sales charge which is deducted from the investment at the time of purchase.
- May impose a low ongoing fee, referred to as a 12b-1 fee, to pay for sales and marketing expenses. The 12b-1 fees in a Class A share are typically lower when compared to Class B & C shares.
- May allow for reductions on front-end sales charges, as the investment amount increases, called "breakpoints." Most breakpoint threshold tables are setup such that the maximum breakpoint level will fully waive

- any front end sales charge.
- Additionally, investors may take advantage of other methods to decrease the sales charge paid on subsequent purchases of Class A shares, such as through rights of accumulation, letters of intent, or family aggregation, which are further discussed to the right.

Rights of Accumulation (ROA)

Most mutual funds allow investors to combine previous purchases (including holdings within accounts with the same or another broker-dealer) of the same fund, or fund family, with current purchases to achieve breakpoint levels. To assist meeting breakpoints, some fund companies may include holdings within a variable annuity. In addition, many mutual funds allow investors to count the value of holdings within accounts of certain related parties, typically spouses and/or children, to qualify for breakpoint discounts. Investors should consult with their registered representative to determine if ROA would assist in qualifying for breakpoint discounts.

Letter of Intent (LOI)

Most mutual funds allow investors to qualify for breakpoint discounts for current and future purchases by signing a LOI, which commits the investor to meet a certain breakpoint threshold within a specified timeframe (typically 13 months). If the investor has either made purchases in the recent past (typically the previous 3 months) and/or intends to make purchases in the future, they should consult with their registered representative to determine if a LOI would assist in qualifying for breakpoint discounts.

Class B Shares

- Have no front-end sales charges.
- May impose a contingent deferred sales charge (CDSC) on share redemptions, which normally decline over a 6-8 year period.

- May impose a relatively higher 12b-1 fee, compared to Class A shares.
- Often automatically convert to Class A shares (and thus pay lower 12b-1 fees) after a period of time (usually after the CDSC declines to zero).

Class C Shares

- Sometimes impose a front-end sales charge, and usually impose a redemption fee if shares are redeemed during the first 12-18 months.
- May also impose a relatively higher 12b-1 fee, compared to Class A & B shares.
- Generally do not convert to A shares (12b-1 fees will not reduce over a period of time).
- Are often used for asset allocation purposes.

Other Share Classes

- May be offered which impose fee and expense structures other than those described above.

8. Variable Annuity Disclosure

Prior to your purchase of a variable annuity, you should carefully read the product's prospectus, prospectus summary, or other disclosure document for complete information about fees and charges, investment risks and other important information. This document reviews in general terms various features of variable annuities of which you should be aware.

What Is a Variable Annuity?

Variable annuities offer investment features similar in many respects to mutual funds. However, a typical variable annuity offers certain features not commonly found in mutual funds: i) tax-deferred treatment of earnings; ii) a death benefit; and iii) annuity payout options that can provide guaranteed income for life or a specified period of time.

In a deferred variable annuity, premiums are allocated among investment portfolios (commonly referred to as subaccounts). In the contract's distribution phase, money is withdrawn typically as a lump sum or through various annuity payment options.

How Do Returns Fluctuate?

A variable annuity's rate of return is not stable. It varies with the stock, bond, and money market subaccounts that you choose as investment options. There is no guarantee that you will earn any return on your investment and there is a risk that you will lose money.

Liquidity and Early Withdrawals. Deferred variable annuities are long-term investments. Many variable annuities assess sales charges upon surrenders within a specified period, which can be as long as 10 years. In addition, withdrawals before an investor reaches the age of 59½ are generally subject to a 10% tax penalty in addition to any gain being taxed as ordinary income.

Charges. Most variable annuities have a sales charge. Many variable annuities impose front-end, asset-based sales charges and/or surrender charges. In addition to sales charges, variable annuities typically assess:

- mortality and expense risk charges or daily asset charges, for the insurance to cover guaranteed death benefits and certain annuity payout options;
- administrative fees, for record-keeping and other administrative expenses;
- underlying fund advisory fees and expenses, charges relating to the investment subaccounts to which you allocate assets; and
- charges for riders, such as minimum guaranteed withdrawal benefits.

Taxes. Contributions and earnings in a variable annuity accumulate tax deferred, until the accumulated amounts are withdrawn, distributions commence, or a required withdrawal is not taken.

Variable Annuities Within IRAs and Retirement Accounts. You should be aware that because IRAs and retirement accounts are already tax-advantaged, a variable annuity will provide no additional tax savings. Also, variable annuities may be a more costly alternative than other available investments such as mutual funds.

9. Business Continuity Plan

ING Financial Advisers, LLC has developed a business continuity plan to respond to possible future significant business disruptions of its operations at different locations.

ING Financial Advisers main office at Windsor, CT, and its other locations, have continuity plans to maintain or resume operations and to serve customers in the event of

a significant business disruption. If a significant business disruption affects the main office facility, the city or the region, ING Financial Advisers is prepared to relocate its key personnel, shift its data processing, telephone service and other communications to backup sites or different locations unaffected by the disruption. It is the goal to have key personnel moved and critical operations running within twenty four hours of the disruption.

ING Financial Advisers has a clearing firm for some of its retail business, Pershing, LLC. Pershing maintains a business continuity plan that includes back-up data centers and alternate processing facilities to address significant business disruptions.

In the event of a significant business disruption customers may contact ING Financial Advisers, Windsor, CT at (800) 525-4225 or (800) 238-6223 to access account information and funds. Customers may contact Pershing, if necessary, at Web site www.pershing.com/about.htm or call (201) 413-3635 for recorded instructions on how to request

funds or securities. If the Web site and telephone number are not available Pershing may be contacted at (213) 624-6100 extension 500.

Please be advised that while ING Financial Advisers has continuity plans in place, the firm cannot guarantee that recovery will be handled as quickly as planned. The recovery may be affected by external conditions and factors not controlled by ING Financial Advisers, such as the unavailability of third parties.

ING Financial Advisers business continuity plan is subject to annual review and modifications. A copy of the plan may be obtained by requesting one from ING Financial Advisers or from your representative.

10 SIPC Membership

ING Financial Advisers is a member of the Securities Investor Protection Corporation (SIPC). Customers may obtain information about SIPC, including the SIPC brochure, by visiting the SIPC website at www.sipc.org or by calling (202) 371-8300.

**For more information
please contact:**

ING Financial Advisers, LLC
One Orange Way
Windsor, CT 06095-4774

www.ing-usa.com
www.ingretirementplans.com

Insurance products, annuities and retirement plan funding issued by (third party administrative services may also be provided by) ING Life Insurance and Annuity Company. Securities are distributed by ING Financial Advisers, LLC (member SIPC), One Orange Way, Windsor, CT 06095-4774.

These companies are wholly owned, indirect subsidiaries of ING Groep N.V. Securities may also be distributed through other broker-dealers with which ING Financial Advisers, LLC has selling agreements.

These companies are members of the ING family of companies. Insurance obligations are the responsibility of each individual company. Products and services may not be available in all states.

Products and services offered through the ING family of companies.

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