



ING Cash Management Strategy

STRATEGY BRIEF

GLOBAL

ING Investment Management at a Glance

ING Investment Management is a leading global asset manager with \$462 billion in assets under management. With over 3,500 employees and an investment presence in 33 countries, ING IM provides clients with access to domestic, regional and global investment solutions.

Mission

ING Investment Management's mission is to find unrecognized value ahead of consensus by seeking original insights on markets and companies. Toward that end, we apply our proprietary research and analytics, benchmark awareness and risk management to serve client needs within the guidelines and objectives of each assignment.

Portfolio Manager

David Yealy

Senior Portfolio Manager,
Money Market

Years of experience: 24

Investment Team

Supported by over 100 investment professionals with a majority averaging 10+ years industry experience.

For more information please contact your relationship manager or go to www.inginvestment.com.

Quarter ending June 30, 2010.

STRATEGY

Summary

This money market strategy is designed to provide above benchmark returns with high liquidity and limited risk to principal.

Objective

Our objective is to provide above benchmark returns with limited risk to principal.

Investment Process

We search for value in all sectors and security types, including asset-backed, commercial mortgage-backed, mortgage-backed, floating rate notes, corporates, agency issues, and commercial paper. Derivatives are used when permitted by client guidelines. Securities are evaluated using the Relative Value Matrix, a proprietary database that tracks the spread relationships between individual securities. We combine this value discovery tool with in-depth, fundamental credit research to buy securities selling at a discount to their intrinsic value.

Contribution to Process and Returns

High Customization



We develop portfolio guidelines that are unique for each client, allowing variations in liquidity needs, credit restrictions and regulatory issues.

High Credit Analysis



We leverage the strength of our credit teams to continuously review the fundamentals and relative value to ensure our portfolios are well-positioned to outperform.

High Yield Curve



The average duration and portfolio structure are based upon our analysis of current market conditions.

High Security Selection



The relative value discovery process and client guidelines provide the basis for buy and sell decisions.

Competitive Advantages

- We work closely with our clients to incorporate their risk tolerances into a customized set of portfolio guidelines
- Portfolios are built one security at a time with a critical review of each issue by experienced managers
- Disciplined relative value philosophy and process are focused on security selection
- Proprietary risk management tools precisely monitor portfolio risk exposures

PERFORMANCE (%)

Composite		Quarter	YTD	Annualized			
				1 Year	3 Years	5 Years	10 Years
	Gross:	0.08	0.15	0.37	2.16	3.26	3.04
	Net:	0.00	0.00	0.07	1.85	2.96	2.73
	Three-Month Treasury Bill	0.04	0.05	0.16	1.57	2.77	2.69
	Excess Return	0.04	0.10	0.21	0.59	0.49	0.35

COMMENTARY

Market Review

Over the past few months the public finance problems faced by the Greek government have gradually evolved into a full-blown fiscal crisis for the Eurozone. This has weighed heavily on the short-term money markets here in the U.S. as most of the large European banks fund a portion of their liquidity needs in our market. Funding beyond 1-month maturities became extremely difficult for most top-tier rated European issuers with the exception of those of the highest quality in Germany, France and the Scandinavian countries. The lack of term funding and the increase in perceived risk drove LIBOR rates higher as the quarter went on. 3-Month LIBOR went from .29% at the end of March to .53% at the end of June. The increase in LIBOR drove money market yields higher even for those issuer not directly exposed to the PIIGS (Portugal, Italy, Ireland, Greece and Spain) sovereign, banking and industrial issuers. In light of the deteriorating outlook for Europe and implications for global economic growth, the stubbornly high U.S. unemployment, continuing weak housing market and below target inflation, the FOMC reiterated at both of the Federal Reserve meetings during the quarter it's "exceptionally low levels of the federal funds rate for an extended period".

Account Performance

Our focus continues to be on the preservation of capital, limiting credit risk and keeping an excess liquidity cushion due to the still elevated risks in the market and not on maximizing the yield and return of the fund. The fund continues to waive fees in order to maintain a 0.00% yield as do most of our competitors due to the historically low level of rates on money

market securities. The fund followed its strategy of taking on interest rate risk while maintaining limited longer-term credit exposure. The fund maintained a weighted average maturity (WAM) at the longer end of its maturity range for most of the quarter by primarily buying longer term Treasury, Agency and selective high quality bank and corporate securities. The fund finished the quarter with a 51 day WAM. The fund also took advantage of the increased funding rates for the European bank issuers by investing primarily in 1-month to 6-month maturities of those issuers that we believe have minimal credit risk in that sector.

Current Strategy and Outlook

Our outlook and strategy are little changed from the previous quarter. It is our opinion that the economy is positioned for a slow recovery in 2010 due to expected high continuing unemployment and the significant slack in the domestic economy. The lack of a sustained and significant housing recovery will remain a drag now that the Federal housing tax rebate has expired. We also expect that the European crisis will put a drag on future global growth including the U.S. We expect the FOMC will be forced to keep the Fed Funds rate in the 0.00% to .25% range well into 2011 or beyond.

Our current strategy for the fund will continue to focus on maintaining an extended weighted average maturity posture with limited credit risk. Preservation of capital and liquidity remain our top objectives. We plan on maintaining above normal excess daily liquidity and short-term liquidity to give the fund flexibility to take advantage of market dislocations such as those we saw last quarter due to the European crisis.

Past performance does not guarantee future results. There is no guarantee that any forecasts or opinions in this material will be realized. Information should not be construed as investment advice.

Please refer to the Schedule of Composite Performance, attached, for additional performance information.

The Composite performance information represents the investment results of a group of fully discretionary accounts managed with the investment objective of outperforming the benchmark. Information is subject to change at any time. Gross returns are presented after all transaction costs, but before management fees. Returns include the reinvestment of income. Net performance is shown after the deduction of a model management fee equal to the highest fee charged. Benchmark source: S&P Citigroup.

Three-Month Treasury bill is a short-term debt obligation backed by the U.S. government with a maturity of less than one year. T-bills are sold in denominations of \$1,000 up to a maximum purchase of \$5 million and commonly have maturities of one month (four weeks), three months (13 weeks) or six months (26 weeks).

PORTFOLIO HIGHLIGHTS

Maturity

	Days
Maximum Maturity	373
Minimum Maturity	1
Weighted Average Maturity	51

Maturity Distribution

	Percent (%)
1-7	34.19
8-30	18.49
31-60	13.27
61-90	17.07
91-180	10.24
181-270	5.92
271-397	0.82

Industry Exposures

	Percent (%)
Cash	32.00
Asset Backed Securities- Publics	29.95
Branches and Agencies of Foreign Banks	24.72
National Commercial Banks	6.74
Commercial Banks	3.43
Federal, Federally Sponsored Credit Institutions	2.66
Other	0.50

Sector Weightings

	Percent (%)
Floating Rate Notes	9.43
Commercial Paper & ABCP	42.05
Agencies	2.66
Treasury	0.00
Repurchase Agreements	32.00
Bank Notes and Certificates of Deposit	1.56
Yankee Certificates of Deposit	9.01
Corporates	3.29

Top Ten Holdings

	Maturity	% of Portfolio
Goldman Sach Tri Party Repo	7/1/10	17.78
Morgan Stanley Tri-Party Repo	7/1/10	14.21
Variable Funding Capital Corp	7/14/10	3.10
Thunder Bay Funding LLC	8/13/10	2.47
ASB Finance Ltd London	9/24/10	2.09
Jupiter Securitization	8/6/10	1.93
Barton Capital Corp	7/26/10	1.58
Dexia Cred Sa Ny Dex Grp	6/29/11	1.56
Westpack Banking Corp	6/28/11	1.55
Old Line Funding LLC	12/13/10	1.51

Alpha: A measure of risk-adjusted performance; expressed as an annualized rate, it is the return that would have been realized by the manager over a measurement period if the return for the market were zero.

Beta: The sensitivity of a portfolio's returns to changes in the return of the market as measured by the index or benchmark that represents the market. A beta of 1.0 behaves exactly like the index. Beta less than 1.0 suggests lower risk than the index; greater than 1.0 indicates a risk level higher than the index.

Tracking Error: A measure of how closely the returns of a fund tend to follow the returns of the index to which it is benchmarked, specifically, the variability of excess returns around the average.

Information Ratio: The ratio of excess returns above a market index to the variability of those excess returns, in effect, describing the value-added from active management in relation to the risk taken in achieving those returns.

R-square: The proportion of the variation in a portfolio's returns that can be explained by the variability of the returns of an index. High R-square (close to 1.0) is usually consistent with broad diversification.

Upside/Downside Capture: is a graphical depiction of the historical risk and return potential of a portfolio versus its benchmark. Upside capture measures how the manager performed when the market was positive, while the downside capture measures the degree to which the manager went down while markets were negative.

The holdings information is based on a sample account in the Composite that we believe best represents this investment management style. It should not be assumed that the adviser continues to hold the securities listed. Other accounts in the Composite might have slightly different portfolio characteristics. The Composite represents the investment returns of a group of fully discretionary accounts managed with similar investment objectives.

The performance above is offered as Supplemental Information only. Please see next page for other important disclosures.

SCHEDULE OF COMPOSITE PERFORMANCE

Year	Composite Returns (%)		90-Day T-bill Returns (%)	Number of Portfolios	Composite Dispersion (%)		Assets in this Composite (\$mm)	Percentage of Firm Assets (%)	Total Firm Assets (\$mm)
	Gross	Net			High	Low			
	2009	0.61			0.31	0.21			
2008	3.01	2.70	2.06	6	3.06	2.99	8,231	14.69	56,044
2007	5.51	5.19	5.02	5	5.53	5.49	4,177	5.62	74,322
2006	5.21	4.89	4.83	5	5.22	5.15	3,020	4.56	66,276
2005	3.35	3.04	3.06	5	3.37	3.29	2,224	3.77	58,983
2004	1.46	1.16	1.33	6	1.49	1.45	1,917	3.06	62,640
2003	1.28	0.87	1.15	6	1.30	1.27	1,875	2.99	62,704
2002	1.99	1.58	1.78	<5	2.04	1.98	2,318	57.58	4,025
2001	4.49	4.08	4.42	<5	4.61	4.43	1,619	58.62	2,763
2000	6.65	6.23	6.18	<5	6.67	6.63	1,200	65.43	1,835

The Firm has prepared and presented this report in compliance with the Global Investment Performance Standards ("GIPS").

NOTES:

- For GIPS purposes, the Firm is defined as all discretionary accounts managed by ING Investment Management Co. and its subsidiary ING Investment Trust Co., but not including collateralized debt obligation structures, long/short hedge funds, structured mortgage derivative portfolios, or specialized accounts supporting the reinsurance arrangements of affiliated insurance companies.
- Effective July 1, 2008, the Firm for GIPS purposes was redefined to exclude its affiliate ING Ghent Asset Management LLC ("ING Ghent"), as a result of the sale of assets managed by the ING Ghent portfolio management team. Previously, on December 31, 2003 the Firm was redefined for GIPS purposes to reflect the consolidation of ING business units and to provide the public with a more meaningful representation of the various investment strategies the Firm has to offer.
- "Composite Dispersion (%)" for each annual period is based on the gross returns shown (after transaction costs) and is equal to the highest and lowest annual return among the portfolios that are included in the composite for the full year.
- Prior to December 31, 2002, the data presented is for the Cash Management accounts managed by ING Investment Management, LLC, an affiliated adviser. During 2003, the management responsibility for these accounts was transferred to Aeltus, at which time the personnel responsible for account management became employees of Aeltus, continuing to manage the accounts.
- Composite returns are calculated from discretionary Cash Management portfolios managed with a view towards reasonable income consistent with capital preservation and liquidity.
- Returns are benchmarked to the 90 day T-bill, which does not incur management fees, transaction costs or other expenses associated with a managed account. The composite benchmark changed from the iMoneyNet Fund Report All Taxable Average to the 90 day T-bill on November 1, 2003. The change was retroactively applied to the historical returns. The 90 day T-bill is consistent with the investment strategy of the composite. It is not possible to invest directly in an index. Past performance is no guarantee of future results.
- On November 15, 2004, the portfolio manager for the ING Cash Management composite changed, having no impact on the investment objective and process.
- All portfolios have been valued on a monthly basis. The composite has been constructed as a beginning-of-period asset-weighted average of each account's time-weighted return and includes reinvestment of income and capital gains.
- Prior to January 1, 2003, no portfolios were excluded based on size. Effective January 1, 2003, a \$25 million minimum has been set for inclusion in the
- Valuation and returns are computed and stated in U.S. dollars.
- Gross performance results are calculated and presented after all trading commissions but before management fees, custody charges, taxes, and other indirect expenses. Net of fee performance results are calculated by subtracting a hypothetical management fee % from the gross return on a monthly basis and geometrically linking the results to produce annual returns shown. As such, the net performance results are net of both trading commissions and management fees, but before custody charges, taxes, and other indirect expenses. The hypothetical management fee is equal to the highest fee % level from any fee schedule currently offered for the strategy shown. While fee schedules can change over time, any amended fee %s resulting from a change will not be retroactively applied to performance history, but will rather be applied on a prospective basis from the point of the change.
- The annual management fee will vary according to the size of the account, and will depend on the type of investment vehicle selected. The fee schedule for an individually managed account for this strategy is: 0.30% on the first \$50 million; 0.20% on the next \$50 million; and 0.15% over \$100 million. However, fee schedules may differ for pooled trusts or other types of investment vehicles. Further information regarding applicable fee schedules is available upon request.
- This composite was created November 1, 2002. A complete list and description of the Firm composites and additional information regarding policies for calculating and reporting returns is available upon request.