

Spaulding Justin Scott
 Form 3
 February 12, 2009

FORM 3 UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Washington, D.C. 20549

OMB APPROVAL

OMB Number: 3235-0104
 Expires: January 31, 2005
 Estimated average burden hours per response... 0.5

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 Person * Â Spaulding Justin Scott (Last) (First) (Middle) | 2. Date of Event Requiring Statement (Month/Day/Year) 01/31/2009 | 3. Issuer Name and Ticker or Trading Symbol ING Asia Pacific High Dividend Equity Income Fund [IAE] | 5. If Amendment, Date Original Filed(Month/Day/Year) |
|---|--|--|--|

ING ASIA PACIFIC 39/F ONE INTERNATIONAL,Â FINANCE CENTER, 1 HARBOUR VIEW STREET

(Street)

(Check all applicable)

Director 10% Owner
 Officer Other
 (give title below) (specify below)
 Director, ING Asia Pac. (HK)

CENTRAL,Â K3Â -

(City) (State) (Zip)

6. Individual or Joint/Group Filing(Check Applicable Line)
 Form filed by One Reporting Person
 Form filed by More than One Reporting Person

Table I - Non-Derivative Securities Beneficially Owned

| 1. Title of Security (Instr. 4) | 2. Amount of Securities Beneficially Owned (Instr. 4) | 3. Ownership Form: Direct (D) or Indirect (I) (Instr. 5) | 4. Nature of Indirect Beneficial Ownership (Instr. 5) |
|---|--|---|--|
| No Securities Beneficially Owned (Directly or Indirectly) | 0 | D | Â |

Reminder: Report on a separate line for each class of securities beneficially owned directly or indirectly.

SEC 1473 (7-02)

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

| | | | | | |
|---|---|--|---------------|--------------|--|
| 1. Title of Derivative Security (Instr. 4) | 2. Date Exercisable and Expiration Date | 3. Title and Amount of Securities Underlying | 4. Conversion | 5. Ownership | 6. Nature of Indirect Beneficial Ownership |
|---|---|--|---------------|--------------|--|

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| (Month/Day/Year) Date Exercisable | Expiration Date | Derivative Security (Instr. 4) Title | Amount or Number of Shares | or Exercise Price of Derivative Security | Form of Derivative Security: Direct (D) or Indirect (I) (Instr. 5) | (Instr. 5) |
|---|--------------------|--|----------------------------------|---|--|------------|
|---|--------------------|--|----------------------------------|---|--|------------|

Reporting Owners

Reporting Owner Name / Address

Relationships

Director 10% Owner Officer Other

Spaulding Justin Scott
 ING ASIA PACIFIC 39/F ONE INTERNATIONAL
 FINANCE CENTER, 1 HARBOUR VIEW STREET
 CENTRAL, K3 -

Â
Â
Â
 Director, ING Asia Pac. (HK)

Signatures

/s/ Justin Scott
 Spaulding

02/12/2009

__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).

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.