Lam Sam Wai Cheng Form 3 February 22, 2012

FORM 3

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

OMB APPROVAL

OMB Number:

3235-0104

0.5

INITIAL STATEMENT OF BENEFICIAL OWNERSHIP OF SECURITIES

January 31, s: 2005

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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 Event Requiring 3. Issuer Name and Ticker or Trading Symbol Person * Statement ING Asia Pacific High Dividend Equity Income Fund A Lam Sam Wai Cheng (Month/Day/Year) [IAE] 08/31/2011 (Last) (First) (Middle) 4. Relationship of Reporting 5. If Amendment, Date Original Person(s) to Issuer Filed(Month/Day/Year) LEVEL 81 INTERNATIONAL (Check all applicable) **COMMERCE** CENTRE, AUSTIN ROAD Director 10% Owner WEST Officer _X__ Other (give title below) (specify below) (Street) 6. Individual or Joint/Group Senior Portfolio Manager Filing(Check Applicable Line) _X_ Form filed by One Reporting Person **KOWLOON HONG** Form filed by More than One KONG, F4Â 00000 Reporting Person (City) (State) (Zip) Table I - Non-Derivative Securities Beneficially Owned 2. Amount of Securities 4. Nature of Indirect Beneficial 1. Title of Security (Instr. 4) Beneficially Owned Ownership Ownership Form: (Instr. 5) (Instr. 4) Direct (D) or Indirect (I) (Instr. 5) No Securities beneficially owned (directly or Â D indirectly) Reminder: Report on a separate line for each class of securities beneficially SEC 1473 (7-02) owned directly or indirectly. Persons who respond to the collection of information contained in this form are not required to respond unless the form displays a

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 (Instr. 4)
2. Date Exercisable and Expiration Date
3. Title and Amount of Securities Underlying Conversion Ownership Beneficial Ownership

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(Month/Day/Year)		Derivative Security (Instr. 4)		or Exercise Price of	Form of Derivative	(Instr. 5)
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			
Fr. Comment	Director	10% Owner	Officer	Other
Lam Sam Wai Cheng LEVEL 81 INTERNATIONAL COMMERCE CENTRE AUSTIN ROAD WEST KOWLOON HONG KONG Â F4Â 00000	Â	Â	Â	Senior Portfolio Manager

Signatures

By: Sam Lam 02/09/2012

**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).

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Remarks:

Mr. Lam is the Senior Portfolio Manager of ING Investment Management Asia/Pacific (Hong Kong).

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.

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