

Spaulding Justin Scott
 Form 3
 February 12, 2009

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

OMB APPROVAL
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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 Person * ^ 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, ^ 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, ^ K3 ^ -

(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 | ^ |

Reminder: Report on a separate line for each class of securities beneficially owned directly or indirectly. SEC 1473 (7-02)

Persons who respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

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 |
|--|---|--|---------------|--------------|--|
|--|---|--|---------------|--------------|--|

