



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 Managers



Steve Salopek
Head of Small-Cap Equity
Years of experience: 20



James Hasso
Portfolio Manager
Years of experience: 14

Investment Team

Supported by 5 Analysts

Average years of experience: 12

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

Quarter ending June 30, 2010.

STRATEGY

Summary

We believe that bottom-up stock selection, driven by experienced and specialized fundamental research, will identify companies that are beneficiaries of sustainable secular growth trends to form portfolios that will produce exceptional performance compared to benchmarks and peer group competitors.

Objective

Our objective is to outperform the Russell 2000 Growth Index by 250 basis points annualized before management fees over full market cycles with annualized tracking error of 3-7%.

Investment Process

We begin with companies in the Russell 2000 Growth Index with market caps from \$300 million to \$3.0 billion, plus opportunities outside the index. A quantitative screening model scores and ranks the universe for growth characteristics, financial position, valuation and other fundamentals. Then we identify secular and cyclical themes that are likely to drive growth opportunities over a foreseeable time horizon. Sector analysts then examine sector and industry fundamentals, competitive positioning, management strength, and financial statements to assess the ability of the company to generate and fund expected growth. Holdings are typically beneficiaries of a theme, have accelerating revenue, EPS and cash flow growth and attractive valuation based on price/sales, forward PE, cash flow yield and net cash/market capitalization. Portfolio construction is based on the attractiveness of each stock, given benchmark weight, expected return, perceived risk and liquidity. Factor based risk analysis ensures consistency with a macro overlay using market, valuation and quality measures.

Contribution to Process and Returns

High Security Selection

Purchase candidates are beneficiaries of a secular or cyclical theme, have accelerating sales, EPS and cash flow growth as well as attractive valuations.

Low

High Sector Allocation

Portfolios are diversified across sectors and are adjusted regularly to maintain economic sector weights within +/- 5% of each sector's index weight.

Low

High Sell Discipline

Stocks are sold if valuation exceeds expectations, our secular thesis changes or industry fundamentals, company earnings, cash flow growth or financial condition deteriorate.

Low

High Market Timing

Market timing is not part of this investment strategy. Cash is kept to a minimum.

Low

Competitive Advantages

- Consistent record of high excess returns vs. the benchmark
- Consistently high peer group rankings
- High quality holdings in terms of earnings, cash flows and balance sheet strength
- Low tracking error

PERFORMANCE (%)

Composite	Quarter	YTD	1 Year	Annualized	
				3 Years	Since inception (8/1/05)*
Gross:	(7.99)	1.39	24.77	(4.44)	3.52
Net:	(8.20)	0.94	23.67	(5.30)	2.61
Russell 2000 Growth Index	(9.22)	(2.31)	17.96	(7.54)	(0.22)
Excess Return	1.23	3.70	6.81	3.09	3.74

COMMENTARY

Market Review

Small-cap growth stocks held up better than small-cap value stocks during the second quarter, as the Russell 2000 Growth Index returned -9.2% versus -10.6% for the Russell 2000 Value Index. This performance differential is the result of growth holding up better than value in the last two months of the quarter, which helped narrow the year-to-date lead that value has. Growth outperformed value in six of the ten economic sectors during the second quarter, and technology and consumer discretionary were the main contributors to the outperformance of growth stocks relative to value. At the sector level for the Russell 2000 Growth, energy and consumer discretionary declined the most while consumer staples held up best; we believe this reflects an increase in fears of a double-dip recession. Information technology, which is the largest sector in the Russell 2000 Growth, held up relatively well in the second quarter.

Account Performance

Stock selection within consumer discretionary and health care benefited the portfolio most during the quarter. Notable outperformance within consumer discretionary was due to strong stock selection within diversified consumer services and textiles, apparel and luxury goods. Within health care, strong stock selection among health care providers and services had the largest positive effect on results. Stock selection within financials and information technology detracted the most from performance. Within technology, returns were held back by stock selection within semiconductors and semiconductor equipment and IT services. Stock selection within capital markets detracted most from performance within financials.

Sybase Inc. and Coinstar Inc. were the two largest contributors to performance over the period. Sybase has agreed to be acquired by SAP for \$5.8 billion, a 56% premium. Sybase will give SAP a consistently profitable and steady database business. Additionally, SAP likely plans to leverage Sybase's mobility platform to deliver more of its enterprise applications on mobile devices.

Coinstar beat earnings expectations for first quarter due to strong sales and margin expansion. Also, the company announced that it had signed additional supply agreements with several studios that guarantee adequate access to DVD releases, which decreased investors' concerns.

Carrizo Oil and Gas Inc. and FormFactor Inc. detracted significantly from performance over the period. Carrizo Oil and Gas is primarily exposed to natural gas, so it has been negatively affected by the decline in natural gas prices, and by the fact that natural gas prices have been weaker than oil prices. We continue to hold the stock as we believe that the company's properties are currently undervalued and we are optimistic about Carrizo's ability to increase its exposure to oil and natural gas liquids.

FormFactor had a change in management that created uncertainty regarding their business strategy going forward. Also, the company's earnings announcement and guidance for the first quarter were below expectations. We continue to hold the position in the portfolio as we believe the company's technology is still good and that despite many recent missteps the intermediate-term value of the company far exceeds the current stock price. We think the company remains attractive from a risk/return perspective.

Current Strategy and Outlook

After the recent decline we believe that the market has become more attractive on a valuation basis. We continue to believe that the economy will improve slowly and that this environment will favor quality companies, as investors focus on companies' fundamentals. As our portfolio has a higher quality bias and we remain focused on companies with strong management, strong balance sheets and good cash flow generation capabilities, we believe that we are well positioned for this market environment. We remain less focused on purely cyclical stocks and intend to take advantage of market volatility to invest in quality companies that are attractively valued.

Manager commentary is for informational purposes only and does not constitute investment advice and is not a recommendation to purchase or sell any of the securities referenced. You can remove the Information should not be construed as investment advice because this covers it. So, the disclosure should appear as such.

Past performance does not guarantee future results. There is no guarantee that any forecasts or opinions in this material will be realized. Manager commentary is for informational purposes only and does not constitute investment advice and is not a recommendation to purchase or sell any of the securities referenced.

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: Frank Russell Company.

Russell 2000 Growth Index measures the performance of small-cap growth stocks in the U.S. equity market including Russell 2000 companies with higher price-to-value ratios and forecasted growth.

PORTFOLIO HIGHLIGHTS

Sector Weights and Allocations

	Sector Weights			Trailing 1-Year Attribution Analysis		
	% of Portfolio	Russell 2000 Growth Index	Overweight/Underweight	Allocation Effect	Selection Effect	Total Effect
Consumer Discretionary	18.75	17.74	1.01	0.07	0.24	0.31
Consumer Staples	2.52	3.16	-0.63	0.04	0.35	0.38
Energy	4.86	3.97	0.89	0.10	0.74	0.85
Financials	5.71	4.94	0.77	-0.16	0.93	0.77
Health Care	20.64	21.51	-0.87	0.25	1.38	1.63
Industrials	16.59	16.70	-0.11	0.01	1.66	1.67
Information Technology	26.02	26.06	-0.04	0.04	0.19	0.24
Materials	3.21	4.45	-1.24	0.09	0.10	0.19
Telecom Services	1.13	1.37	-0.24	0.12	0.40	0.52
Utilities	0.57	0.11	0.46	-0.08	0.28	0.20
Cash	NA	NA	NA	-0.37	0.00	-0.37
Total	100	100	NA	0.12	6.27	6.39

Returns-Based Characteristics

Three years ending 6/30/10

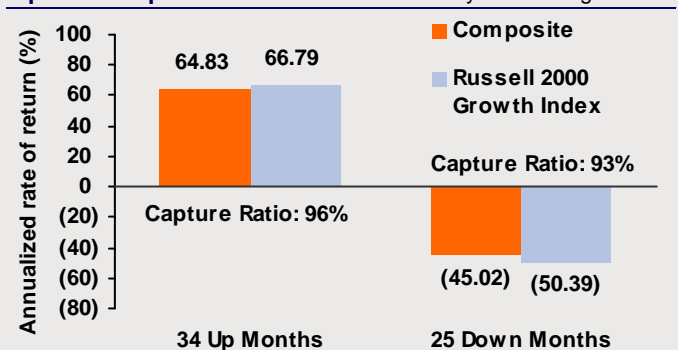
	Composite	Russell 2000 Growth Index
Standard Deviation (%)	24.30	25.97
Tracking Error (%)	3.83	NA
Information Ratio	0.81	NA
Alpha (annualized %)	2.44	NA
Beta	0.93	1.00
R-Squared	0.98	1.00
Sharpe Ratio	(0.24)	(0.34)

Security Characteristics

	Portfolio	Russell 2000 Growth Index
Weighted Avg. Cap. (\$ Millions)	1,496	974
P/E (next 12 mos.)	15.11	15.26
EPS Growth % (next 12 mos.)	14.92	26.86
P/E ÷ EPS Growth (next 12 mos.)	1.01	0.57
Price to Cash Flow	13.01	13.54
ROA (%)	5.59	4.67
Number of Issues	157	1,286

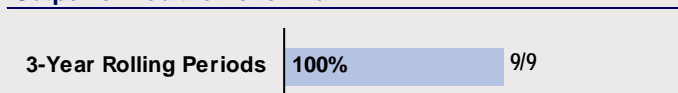
Up/Down Capture Ratio

Three years ending 6/30/10



Percentage of Time the Composite Outperformed the Benchmark

8/1/05 to 6/30/10



Top Ten Holdings

	% of Portfolio
HealthSouth Corp.	1.37
Genesee & Wyoming Inc. (CI A)	1.30
Watsco Inc.	1.29
Chemed Corp.	1.24
Gymboree Corp.	1.24
Blackboard Inc.	1.21
Silgan Holdings Inc.	1.19
Diamond Foods Inc.	1.17
Parametric Technology Corp.	1.14
Stifel Financial Corp.	1.10

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.

Attribution results over long periods are not guaranteed to be accurate relative to the sum of a series of shorter periods.

The sector, security, and 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. Returns-Based Characteristics are based on the Composite returns.

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

SCHEDULE OF COMPOSITE PERFORMANCE

ING Small-Cap Growth Composite Performance

Year	Composite Returns (%)		Russell 2000 Returns (%)	Number of Portfolios	Composite Dispersion (%)		Assets in this Composite (\$mm)	Percentage of Firm Assets (%)	Total Firm Assets (\$mm)
	Gross	Net			High	Low			
2009	32.27	31.11	34.47	5	32.98	31.69	455	0.74	61,599
2008	(33.90)	(34.51)	(38.54)	5	(33.76)	(33.92)	372	0.66	56,044
2007	11.85	10.90	7.05	6	12.62	10.94	691	0.93	74,322
2006	13.79	12.84	13.35	<5	14.02	13.58	351	0.53	66,276
2005*	5.04	4.67	0.97	<5	NA	NA	387	0.66	58,983

1. Composite returns are calculated from discretionary Small-Cap Growth portfolios managed under the small-cap fundamental research-driven investment process initiated on or about August 1, 2005, with a view towards outperforming the index over full market cycles with moderately active tracking error.
2. As of August 1, 2005, the Small-Cap Growth Composite was created to represent the record of a new small-cap investment process which was initiated on or about that date. For complete historical composite results of the strategy including all small-cap managers and investment processes over time, please refer to the ING Small-Cap Growth (All History) Calendar Year Performance, attached hereto.1

* Cumulative return for the period from August 1, 2005 (inception of current small-cap investment team and process) to December 31, 2005.

NA = not applicable 1 For complete historical composite results of the strategy including all small-cap managers and investment processes over time, please refer to the ING Small-Cap Growth (All History) Calendar Year Performance, attached hereto.

ING Small-Cap Growth (All History) Composite Performance

Year	Composite Returns (%)		Russell 2000 Returns (%)	Number of Portfolios	Composite Dispersion (%)		Assets in this Composite (\$mm)	Percentage of Firm Assets (%)	Total Firm Assets (\$mm)
	Gross	Net			High	Low			
2009	32.27	31.11	34.47	5	32.98	31.69	455	0.74	61,599
2008	(33.90)	(34.51)	(38.54)	5	(33.76)	(33.92)	372	0.66	56,044
2007	11.85	10.90	7.05	6	12.62	10.94	691	0.93	74,322
2006	12.53	11.58	13.35	6	14.02	11.65	916	1.38	66,276
2005	10.80	9.87	4.15	6	11.61	10.02	896	1.52	58,983
2004	7.99	7.08	14.31	8	11.47	5.36	972	1.55	62,640
2003	47.20	45.99	48.54	8	48.84	48.38	996	1.59	62,704
2002	(26.77)	(27.41)	(30.26)	6	(26.52)	(26.83)	331	0.86	38,649
2001	(8.76)	(9.54)	(9.23)	6	(8.44)	(9.69)	415	0.99	41,897
2000	(6.98)	(7.78)	(22.43)	5	(5.07)	(7.47)	394	0.70	56,169

1. This composite contains performance results achieved by ING IM since the inception of its small-cap core strategy, defined broadly. It therefore contains data relating to portfolio management teams and investment processes employed over time. Only the results shown from August 1, 2005 to present represent those of the current small-cap investment team and process. For the performance results of that time period only please see the ING Small-Cap Growth Calendar Year Performance, attached hereto.1
2. Composite returns are calculated from discretionary Small-Cap Growth portfolios managed with a view towards outperforming the index over full market cycles while maintaining a market level of risk.
 - 1 For performance results for the current small-cap investment team and process from August 1, 2005 to present please see the ING Small-Cap Growth Calendar Year Performance, attached hereto.

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

NOTES:

1. 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.
2. 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.
3. "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.
4. Returns are benchmarked to the Russell 2000 Growth Index which does not incur management fees, transaction costs or other expenses associated with a managed account. It is not possible to invest directly in an index. Past performance is no guarantee of future results.
5. 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.
6. A \$20 million minimum has been set for inclusion in the composite.
7. Valuations and returns are computed and stated in U.S. dollars.
8. Where permitted, equity index futures may be used to gain market exposure on cash balances. No leverage or options are used.
9. 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.
10. 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: 0.90% on the first \$25 million; 0.80% on the next \$75 million; 0.70% on the next \$150 million; 0.60% on the next \$250 million; and 0.50% over \$500 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.
11. This composite was created December 1, 2007. A complete list and description of the Firm composites and additional information regarding policies for calculating and reporting returns is available upon request.