Straatman Jan Form 3 March 23, 2009

FORM 3

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

INITIAL STATEMENT OF BENEFICIAL OWNERSHIP OF

OMB APPROVAL

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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 *

Straatman Jan

(Last) (First)

(Middle)

Statement

(Month/Day/Year)

03/23/2009

2. Date of Event Requiring 3. Issuer Name and Ticker or Trading Symbol

ING Asia Pacific High Dividend Equity Income Fund

[IAE]

4. Relationship of Reporting Person(s) to Issuer

5. If Amendment, Date Original

Filed(Month/Day/Year)

PRINSES BEATRIXLAAN 15

(Street)

(Check all applicable)

to subadvisor

Director 10% Owner X_ Officer Other (give title below) (specify below)

6. Individual or Joint/Group

Filing(Check Applicable Line) _X_ Form filed by One Reporting

Person

_ Form filed by More than One

Reporting Person

THE HAGUE. P7Â 2595 AK

(City) (State)

1. Title of Security (Instr. 4)

2. Amount of Securities Beneficially Owned

(Instr. 4)

3. Ownership

Table I - Non-Derivative Securities Beneficially Owned

4. Nature of Indirect Beneficial

Ownership Form: (Instr. 5)

Direct (D) or Indirect (I) (Instr. 5)

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

(Zip)

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.

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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)

(Month/Day/Year)

2. Date Exercisable and **Expiration Date**

3. Title and Amount of Securities Underlying **Derivative Security** (Instr. 4)

4. Conversion or Exercise Price of

5. Ownership Form of Derivative Security:

6. Nature of Indirect Beneficial Ownership (Instr. 5)

Date **Expiration Title** Exercisable Date

Amount or Number of Shares

Derivative Security

Direct (D) or Indirect

(Instr. 5)

Reporting Owners

Reporting Owner Name / Address Director | 10% Owner | Officer | Other |
Straatman Jan | PRINSES BEATRIXLAAN 15 | \hat{A} | \hat{A} | \hat{A} | to subadvisor | \hat{A} | THE HAGUE, \hat{A} P7 \hat{A} 2595 AK

Signatures

Jan Straatman 03/23/2009

**Signature of Reporting Person Date

Explanation of Responses:

No securities are beneficially owned

- * 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.

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