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ING Asia Pacific High Dividend Equity Income Fund
Form NSAR-B
April 29, 2011

PAGE 1
000 B000000 02/28/2011
000 C000000 0001385632
000 D000000 N
000 E000000 NF
000 F000000 Y
000 G000000 N
000 H000000 N
000 I000000 6.1
000 J000000 A
001 A000000 ING ASIA PACIFIC HIGH DIVIDEND EQUITY INCOME
001 B000000 811-22004
001 C000000 8009920180
002 A000000 7337 E DOUBLETREE RANCH RD, SUITE 100
002 B000000 SCOTTSDALE
002 C000000 AZ
002 D010000 85258
002 D020000 2034
003 000000 N
004 000000 N
005 000000 N
006 000000 N
007 A000000 N
007 B000000 0
007 C010100 1
007 C010200 2
007 C010300 3
007 C010400 4
007 C010500 5
007 C010600 6
007 C010700 7
007 C010800 8
007 C010900 9
007 C011000 10
008 A000001 ING INVESTMENTS, LLC
008 B000001 A
008 C000001 801-48282
008 D010001 SCOTTSDALE
008 D020001 AZ
008 D030001 85258
008 D040001 2034
008 A000002 ING INVESTMENT MANAGEMENT ASIA/PACIFIC LTD.
008 B000002 S
008 C000002 801-000000
008 D010002 HONG KONG
008 D050002 HONG KONG
008 A000003 ING INVESTMENT MANAGEMENT ADVISORS B.V.
008 B000003 S
008 C000003 801-000000
008 D010003 THE HAGUE
008 D050003 THE NETHERLANDS
008 D060003 2509LL
PAGE 2
010 A000001 ING FUNDS SERVICES, LLC
010 C010001 SCOTTSDALE
010 C020001 AZ
010 C030001 85258
010 C040001 2034
011 A000001 CITIGROUP GLOBAL MARKETS INC.

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011 B000001 8-08177
011 C010001 NEW YORK
011 C020001 NY
011 C030001 10013
011 C040001 2396
012 A000001 BNY MELLON SHAREOWNER SERVICES
012 B000001 85-05006
012 C010001 JERSEY CITY
012 C020001 NJ
012 C030001 07310
013 A000001 KPMG LLP
013 B010001 BOSTON
013 B020001 MA
013 B030001 02111
014 A000001 AMSTERDAM BROKER DE ASIGURARE S.R.L.
014 B000001 8-00000000
014 A000002 BANCNORTH INVESTMENT GROUP, INC
014 B000002 8-00000000
014 A000003 BLEAKLEYS LIMITED
014 B000003 8-00000000
014 A000004 CHARTERHOUSE SECURITIES LTD.
014 B000004 8-00000000
014 A000005 COMPULIFE INVESTOR SERVICES
014 B000005 8-00000000
014 A000006 EQUISURE FINANCIAL NETWORK
014 B000006 8-00000000
014 A000007 EUROSIM SOCIETA DI INTERMEDIAZIONE MOBILIARE
014 B000007 8-00000000
014 A000008 FINANCIAL NETWORK INVESTMENT CORPORATION
014 B000008 8-00000000
014 A000009 FUNDIX B.V.
014 B000009 8-00000000
014 A000010 GUARANTY BROKERAGE SERVICES, INC.
014 B000010 8-00000000
014 A000011 ING (MEXICO), S.A. DE C.V., CASA DE BOLSA
014 B000011 8-00000000
014 A000012 ING AMERICA EQUITIES, INC.
014 B000012 8-00000000
014 A000013 ING ARGENTINA S.A.
014 B000013 8-00000000
014 A000014 ING BANK FONDSSEN BEHEER B.V.
014 B000014 8-00000000
014 A000015 ING BANK GLOBAL CUSTODY N.V.
014 B000015 8-00000000
014 A000016 ING BANK N.V.
PAGE 3
014 B000016 8-00000000
014 A000017 ING BANK SLASKI S.A.
014 B000017 8-00000000
014 A000018 ING BANK UKRAINE
014 B000018 8-00000000
014 A000019 ING CORRETORA DE CAMBIO E TITULOS S.A.
014 B000019 8-00000000
014 A000020 ING FINANCIAL ADVISERS, LLC
014 B000020 8-00000000
014 A000021 ING FINANCIAL MARKETS AV
014 B000021 8-00000000
014 A000022 ING FINANCIAL MARKETS LLC
014 B000022 8-00000000
014 A000023 ING FINANCIAL PARTNERS, INC.
014 B000023 8-00000000
014 A000024 ING FUND MANAGEMENT B.V.

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014 B000024 8-00000000
014 A000025 ING FUNDS DISTRIBUTOR, LLC
014 B000025 8-00000000
014 A000026 ING FUTURES & OPTIONS (U.K.) LIMITED
014 B000026 8-00000000
014 A000027 ING INVESTMENT MANAGEMENT (EUROPE) B.V.
014 B000027 8-00000000
014 A000028 ING INVESTMENT MANAGEMENT B.V.
014 B000028 8-00000000
014 A000029 ING INVESTMENT MANAGEMENT SERVICES LLC
014 B000029 8-00000000
014 A000030 ING LUXEMBOURG S.A.
014 B000030 8-00000000
014 A000031 ING MANAGEMENT LIMITED
014 B000031 8-00000000
014 A000032 ING MORTGAGE BROKER SERVICES INC.
014 B000032 8-00000000
014 A000033 ING SECURITIES (INDIA) PVT. LTD.
014 B000033 8-00000000
014 A000034 ING SECURITIES S.A.
014 B000034 8-00000000
014 A000035 ING SOCIEDAD DE BOLSA (ARGENTINA), S.A.
014 B000035 8-00000000
014 A000036 ING VALORES (VENEZUELA) C.A..
014 B000036 8-00000000
014 A000037 INSURANCE BROKERS HOTLINE PTY LIMITED
014 B000037 8-00000000
014 A000038 MC-BBL SECURITIES LTD.
014 B000038 8-00000000
014 A000039 PRIMEVEST FINANCIAL SERVICES, INC.
014 B000039 8-00000000
014 A000040 SHAREBUILDER SECURITIES CORP.
014 B000040 8-00000000
014 A000041 SILVER FERN LIFE BROKERS LIMITED
014 B000041 8-00000000
PAGE 4
014 A000042 SYSTEMATIZED BENEFITS ADMINISTRATORS, INC.
014 B000042 8-00000000
014 A000043 WESTLAND UTRECHT EFFECTENBANK N.V.
014 B000043 8-00000000
015 A000001 THE BANK OF NEW YORK MELLON
015 B000001 C
015 C010001 NEW YORK
015 C020001 NY
015 C030001 10286
015 E010001 X
018 000000 Y
019 A000000 Y
019 B000000 170
019 C000000 ING--FUNDS
020 A000001 MERRILL LYNCH & CO., INC.
020 B000001 13-5674085
020 C000001 47
020 A000002 MACQUARIE SECURITIES INC
020 B000002 98-0141094
020 C000002 46
020 A000003 DEUTSCHE BANK AG
020 B000003 13-2518466
020 C000003 43
020 A000004 UBS AG LYONNAIS
020 B000004 13-2932996
020 C000004 16

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020 A000005 CITIGROUP, INC.IRST BOSTON
 020 B000005 11-2418191
 020 C000005 8
 020 A000006 MORGAN STANLEY & CO., INC.
 020 B000006 94-1671384
 020 C000006 7
 020 A000007 CREDIT LYONNAIS
 020 B000007 00-0847349
 020 C000007 7
 020 A000008 CREDIT SUISSE FIRST BOSTON
 020 B000008 13-5659485
 020 C000008 4
 020 A000009 ABN AMRO BANK N.V.
 020 B000009 13-3227945
 020 C000009 2
 020 A000010 SGZ BANK
 020 B000010 #N/A
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 021 000000 181
 022 A000001 MORGAN STANLEY & CO., INC.
 022 B000001 94-1671384
 022 C000001 2408
 022 D000001 3017
 022 A000002 MERRILL LYNCH & CO., INC.
 022 B000002 13-5674085
 PAGE 5
 022 C000002 1938
 022 D000002 3341
 022 A000003 DEUTSCHE BANK AG
 022 B000003 13-2518466
 022 C000003 673
 022 D000003 3936
 022 A000004 CITIGROUP, INC.
 022 B000004 11-2418191
 022 C000004 1741
 022 D000004 2526
 022 A000005 GOLDMAN SACHS & CO.
 022 B000005 13-5108880
 022 C000005 1632
 022 D000005 2595
 022 A000006 BANCA DELLA SVIZZERA ITA
 022 B000006 #N/A
 022 C000006 0
 022 D000006 204
 022 A000007 MACQUARIE SECURITIES
 022 B000007 98-0141094
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 022 D000007 0
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 022 D000009 0
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 022 D000010 0
 023 C000000 9315
 023 D000000 16946
 024 000000 Y
 025 A000001 MACQUARIE
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 025 D000001 1418
 025 D000002 0

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| 026 | E000000 | N |
| 026 | F000000 | N |
| 026 | G010000 | N |
| 026 | G020000 | N |
| 026 | H000000 | N |
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| 046 | 000000 | N |
| 047 | 000000 | Y |
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054 O000000 Y
055 A000000 N
055 B000000 N
056 000000 Y
057 000000 N
PAGE 7
058 A000000 N
058 B000000 N
058 C000000 N
058 D000000 N
058 E000000 N
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PAGE 8
070 F020000 N
070 G010000 Y
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070 H010000 Y

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| | | | |
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| 070 | M010000 | Y | |
| 070 | M020000 | Y | |
| 070 | N010000 | Y | |
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| 070 | O010000 | Y | |
| 070 | O020000 | N | |
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| | | |
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| 073 | C000000 | 0.0000 |
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| 077 | B000000 | Y |
| 077 | C000000 | N |
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| 080 | B000000 | N/A |
| 080 | C000000 | 25000 |
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| 081 | B000000 | 142 |
| 082 | A000000 | N |
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| | | | |
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| 083 | A000000 | N | |
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| 087 | A020000 | 44983J107 | |
| 087 | A030000 | XIAEX | |
| 088 | A000000 | N | |
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| 088 | C000000 | N | |
| 088 | D000000 | N | |
| SIGNATURE | TODD MODIC | | |
| TITLE | CFO | | |