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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  
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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  
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020 C000010 1  
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  
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022 A000007 MACQUARIE SECURITIES  
022 B000007 98-0141094  
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022 C000009 0  
022 D000009 0  
022 C000010 0  
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023 C000000 9315  
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024 000000 Y  
025 A000001 MACQUARIE  
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025 D000002 0

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PAGE 7  
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070 F020000 N  
070 G010000 Y  
070 G020000 N  
070 H010000 Y

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070	H020000	N	
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077	Q020000	N
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080	C000000	25000
081	A000000	Y
081	B000000	142
082	A000000	N
082	B000000	0



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083	A000000	N	
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087	A030000	XIAEX	
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TITLE	CFO		