

PERFORMANCE UPDATE

ING Life Insurance and Annuity Company

MULTNOMAH COUNTY

Separate Account D, Group Annuity Contract

Average Annual Total Returns as of: 10/31/2010 (shown in percentages)

Variable annuities and funding agreements are long-term investment vehicles designed for retirement purposes which allow you to allocate contributions among variable investment options that have the potential to grow tax-deferred with an option to receive a stream of income at a later date.

The performance data quoted represents past performance. Past performance does not guarantee future results. For month-end performance which may be lower or higher than the performance data shown please call 800-232-5422. Investment return and principal value of an investment will fluctuate so that, when sold, an investment may be worth more or less than the original cost.

These numbers reflect total Separate Account charges of 0.00% on an annual basis. They also assume reinvestment of all dividends (ordinary income and capital gains) and are net of management fees and other fund operating expenses.

Depending upon the type of contract in which you participate, you have either received disclosure booklets for the separate account and/or fund prospectuses. You should consider the investment objectives, risks and charges, and expenses of the variable product and its underlying fund options carefully before investing. The disclosure booklet contains this and other information. Anyone who wishes to obtain a free copy of the separate account disclosure booklet and/or fund prospectuses may call their ING representative or the number above. Please read the separate account disclosure booklet and/or the fund prospectuses carefully before investing.

Returns less than one year are not annualized. Fund Inception Date is the date of inception for the underlying fund, and is the date used in calculating the periodic returns. This date may also precede the portfolio's inclusion in the product.

Investment Options	1-Mo	3-Mo	YTD	1-Yr	3-Yr	5-Yr	10-Yr	Incept	Fund Inception Date
Stability of Principal									
ING Fixed Account - 457/401 - 043 (1)(11) <i>This fund is not part of the product's separate account.</i>	0.30	0.88	2.95	3.55	3.84	4.02	4.75		
Bonds									
<i>High Yield Bond</i>									
Pioneer High Yield Fund - Class A - 948	3.87	7.87	12.93	19.66	3.71	6.77	7.91		02/12/1998
<i>Intermediate Government</i>									
ING GNMA Income Fund - Class I - 240 (2)	1.14	0.94	7.20	6.77	7.23	6.40	6.05		08/17/1973
<i>Intermediate-Term Bond</i>									
ING Intermediate Bond Portfolio - Class I - 004	0.63	2.80	11.15	12.02	4.93	4.88	5.84		05/23/1973
Asset Allocation									
<i>Lifecycle</i>									
ING Solution 2015 Portfolio - Initial Class - 746	2.55	6.10	8.69	14.15	-1.72	3.23		3.73	04/29/2005
ING Solution 2025 Portfolio - Initial Class - 790	3.19	8.06	8.81	15.87	-4.52	2.25		3.08	04/29/2005
ING Solution 2035 Portfolio - Initial Class - 761	3.34	8.72	8.83	16.82	-5.61	2.20		3.16	04/29/2005
ING Solution 2045 Portfolio - Initial Class - 764	3.53	9.31	8.99	17.49	-6.85	1.85		3.09	04/29/2005
ING Solution 2055 Portfolio - Initial Class - 1166	3.57	9.37						7.19	03/08/2010
ING Solution Income Portfolio - Initial Class - 767	1.77	4.66	8.57	11.90	1.82	4.28		4.25	04/29/2005
Balanced									



Investment Options	1-Mo	3-Mo	YTD	1-Yr	3-Yr	5-Yr	10-Yr	Incept	Fund Inception Date
Moderate Allocation									
American Balanced Fund® - Class R-4 - 823 (3)	2.90	6.67	9.13	14.85	-1.62	3.67	5.61		07/26/1975
Pax World Balanced Fund - Individual Investor Class - 193	3.56	7.50	6.66	12.04	-4.27	2.27	2.38		08/10/1971
Large Cap Value									
Large Blend									
Pioneer Fund VCT Portfolio - Class I - 224	3.94	8.53	7.48	16.30	-5.52	2.40	0.89		10/31/1997
Vanguard® 500 Index Fund - Signal® Shares - 1404 (4)	3.80	7.97	7.83	16.52	-6.44	1.75		0.55	11/13/2000
Large Value									
BlackRock Large Cap Value Fund - Institutional Shares - 1264	3.11	6.34	2.88	10.47	-9.85	-0.57	4.10		12/22/1999
ING T. Rowe Price Equity Income Port. - Institutional Class - 622 (5)	2.79	5.24	6.57	14.53	-6.33	1.94	3.84		01/24/1989
Lord Abbett Affiliated Fund - Class A - 978	3.42	5.40	4.27	11.07	-9.43	-0.10	1.35		05/14/1934
Large Cap Growth									
Large Growth									
Alger Green Fund - Class A - 1584	2.90	7.30	4.69	15.08	-7.90	4.57		-1.27	12/04/2000
Fidelity® Advisor New Insights Fund - Institutional Class - 1600	4.11	11.34	10.84	20.38	-4.54	4.83		10.18	07/31/2003
The Growth Fund of America® - Class R-4 - 572 (6)	4.20	8.61	6.12	14.99	-6.15	2.72	1.43		12/01/1973
Small/Mid/Specialty									
Mid-Cap Blend									
Vanguard® Mid-Cap Index Fund - Signal® Shares - 1406 (7)	4.05	9.95	15.08	28.28	-3.68	3.87		7.63	11/12/2001
Mid-Cap Growth									
ING MidCap Opportunities Portfolio - Class I - 081	5.34	13.83	20.61	34.46	2.19	9.14	0.85		05/05/2000
Mid-Cap Value									
Artisan Mid Cap Value Fund - Investor Shares - 1618	2.76	7.43	7.79	18.47	1.23	5.59		10.41	03/28/2001
ING JPMorgan Mid Cap Value Portfolio - Initial Class - 429	3.74	8.10	14.25	25.05	-2.63	3.93		7.42	05/01/2002
Small Blend									
Lord Abbett Small-Cap Value Fund - Class A - 362	3.11	7.20	13.05	27.32	-1.23	6.97	11.08		12/13/1995
Vanguard® Small-Cap Index Fund - Signal® Shares - 1407 (8)	4.08	8.89	15.15	28.41	-2.39	4.26		6.43	11/13/2000
Small Growth									
ING Baron Small Cap Growth Portfolio - Initial Class - 430	3.31	6.52	12.38	20.85	-5.57	2.94		7.06	05/01/2002
Small Value									
ING American Century Small-Mid Cap Value Portfolio - Initial - 434	2.18	5.81	10.85	22.13	1.36	5.46		7.33	05/01/2002
Specialty - Real Estate									
ING Global Real Estate Fund - Class I - 1308	3.76	11.95	12.85	20.65	-8.32	4.66		11.98	11/05/2001
Global / International									
Foreign Large Blend									
EuroPacific Growth Fund® - Class R-4 - 573 (9)	3.20	10.44	6.84	12.80	-5.51	7.14	6.01		04/16/1984
Foreign Large Value									
ING International Value Portfolio - Class I - 228	2.90	7.11	0.75	4.71	-11.11	2.79	3.45		08/08/1997
World Stock									
New Perspective Fund® - Class R-4 - 818 (10)	4.30	10.87	7.95	16.17	-4.26	6.51	5.31		03/13/1973

The risks of investing in small company stocks may include relatively low trading volumes, a greater degree of change in earnings and greater short-term volatility.

Foreign investing involves special risks such as currency fluctuation and public disclosure, as well as economic and political risks.

Some of the Funds invest in securities guaranteed by the U.S. Government as to the timely payment of principal and interest; however, shares of the Funds are not insured nor guaranteed.

High yielding fixed-income securities generally are subject to greater market fluctuations and risks of loss of income and principal than are investments in lower yielding fixed-income securities.

See Performance Introduction Page for Important Information

Sector funds may involve greater-than average risk and are often more volatile than funds holding a diversified portfolio of stocks in many industries. Examples include: banking, biotechnology, chemicals, energy, environmental services, natural resources, precious metals, technology, telecommunications, and utilities.

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Investment Options	1-Mo	3-Mo	YTD	1-Yr	3-Yr	5-Yr	10-Yr	Incept	Fund Inception Date
Stability of Principal									
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Bonds									
<i>High Yield Bond</i>									
Pioneer High Yield Fund - Class A - 948	5.38	8.49	8.72	15.51	3.02	5.59	7.31		02/12/1998
<i>Intermediate Government</i>									
ING GNMA Income Fund - Class I - 240 (2)	-0.21	0.83	5.99	6.32	7.19	6.05	5.98		08/17/1973
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Additional Notes

(1)The CURRENT rate for the ING Fixed Account - 457/401 Base+115 is 3.55%, expressed as an annual effective yield, and is guaranteed not to drop below 3.20% through 12/31/2010. The annual rate of interest applied to your account may be higher or lower than the current rate. Restrictions may apply to transfers of funds from the Fixed Account to other contract investment options. Please refer to your product prospectus / disclosure booklet and call your 800 number for more information.

(2)ING GNMA Income Fund - Class I has identical investment objectives and policies, the same portfolio manager, and invests in the same holdings as Class A. The performance information above is based upon the Class A performance, excluding sales charges, and has not been adjusted by the fee differences between classes.

Additional Notes

(3)The American Balanced Fund - Class R-4 commenced operations on June 21, 2002. The fund has identical investment objectives and policies, the same portfolio manager, and invests in the same holdings as Class A of this fund. The performance information for the American Balanced Fund - Class R-4 prior to June 21, 2002 is based upon the Class A performance, adjusted by fees associated with Class R-4.

(4)The Vanguard 500 Index Fund - Signal Shares commenced operations on September 29, 2006. The Signal Shares has identical investment objectives and policies, the same portfolio manager, and invests in the same holdings as Admiral. The performance information above prior to September 29, 2006 is based upon the Admiral Class performance.

(5)ING T. Rowe Price Equity Income Portfolio - Class I commenced operations on May 1, 2003. Class I has identical investment objectives and policies, the same portfolio manager, and invests in the same holdings as Class S. The performance information above prior to May 1, 2003 is based upon the Class S performance not adjusted by the fee differences between classes.

(6)The Growth Fund of America - Class R-4 commenced operations on May 15, 2002. Class R-4 has identical investment objectives and policies, the same portfolio manager, and invests in the same holdings as Class A. The performance information above prior to May 15, 2002 is based upon the Class A performance adjusted by the fee differences between classes.

(7)The Vanguard Mid-Cap Index Fund - Signal Shares commenced operations on August 17, 2006. The Signal Shares has identical investment objectives and policies, the same portfolio manager, and invests in the same holdings as Admiral. The performance information above prior to August 17, 2006 is based upon the Admiral Class performance.

(8)The Vanguard Small-Cap Index Fund - Signal Shares commenced operations on December 15, 2006. The Signal Shares has identical investment objectives and policies, the same portfolio manager, and invests in the same holdings as Admiral. The performance information above prior to December 15, 2006 is based upon the Admiral Class performance.

(9)EuroPacific Growth Fund - Class R-4 commenced operations on May 15, 2002. Class R-4 has identical investment objectives and policies, the same portfolio manager, and invests in the same holdings as Class A. The performance information above prior to May 15, 2002 is based upon the Class A performance adjusted by the fee differences between classes.

(10)The New Perspective Fund - Class R-4 commenced operations on May 28, 2002. The fund has identical investment objectives and policies, the same portfolio manager, and invests in the same holdings as Class A of this fund. The performance information for the New Perspective Fund - Class R-4 prior to May 28, 2002 is based upon the Class A performance, adjusted by fees associated with Class R-4.

(11)The Investment Option is neither a mutual fund nor part of a Separate Account. The returns listed do not include the impact of contract charges. Please refer to the contract or disclosure book to determine which Fixed Interest Options are available for your specific plan. The Investment Option is offered through ING Life and Insurance Annuity Company.

Investment Options are listed in asset class order, each of which has unique risk characteristics.

Separate Account charges may be lower for your account and a Maintenance Fee may or may not apply to your account. A DSC may or may not apply to your account.

The chart shows the performance for each investment option for the time periods shown.

Insurance products, annuities and funding agreements issued by ING Life Insurance and Annuity Company One Orange Way Windsor, CT 06095, (ILIAC), which is solely responsible for meeting its obligations. Plan administrative services provided by ILIAC or ING Institutional Plan Services, LLC. All companies are members of the ING family of companies. Securities are distributed by or offered through ING Financial Advisers, LLC (member SIPC) or other broker-dealers with which it has a selling agreement.

Not all investments options are available under all contracts; please check your disclosure booklet for options available under your plan.

The returns do not reflect the impact of a Deferred Surrender Charge. If included, performance would be less favorable.