P E R F O R M A N C E   U P D A T E

ING Life Insurance and Annuity Company

NORTHWESTERN STATE UNIVERSITY

Variable Annuity Account C, Non-Standardized Returns with and without a Deferred Sales Charge

Average Annual Total Returns as of: 05/31/2009 (shown in percentages)

Variable annuities 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, or in the case of Roth contributions, tax free, with an option to receive a stream of income at a later date. Early withdrawals may be subject to surrender charges, and if taken prior to age 59 1/2, a 10% IRS penalty may apply. Taxes are due upon withdrawal of tax-deferred assets; withdrawals will also reduce the applicable death benefit and cash surrender value/account value.

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 1.00% on an annual basis, a pro-rata portion of the Maintenance / Administrative Fee of $15.00 deducted annually, and the applicable deferred sales charge (for those returns specified by the column heading), which declines over 10 years as follows: 5%, 5%, 5%, 5%, 5%, 4%, 4%, 3%, 3%, 2%. 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 prospectuses and/or prospectus summaries for the separate account and the funds/variable investment options (vios). You should consider the investment objectives, risks and charges, and expenses of the variable product and its underlying fund options carefully before investing. The prospectus contains this and other information. Anyone who wishes to obtain a free copy of the separate account and/or fund/vios prospectuses may call their ING representative or the number above. Please read the prospectus or prospectus summaries 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. The fund inception date indicates the inception date of the underlying investment portfolio, which may precede the portfolio's inclusion in the product.

Investment Options	Without a Deferred Sales Charge				With a Deferred Sales Charge				Fund Inception Date
	1-Yr	3-Yr	5-Yr	10-Yr / Inception	1-Yr	3-Yr	5-Yr	10-Yr / Inception	
Stability of Principal									
ING Fixed Plus Account - 019 (1)(17)	3.43	3.65	3.72	4.48					
This fund is not part of the product's separate account.									
Money Market									
ING Money Market Portfolio - Class I - 003 (2)	0.34	2.57	2.23	2.18	-4.68	0.83	1.40	2.18	01/01/1980
The 7-day annualized Subaccount yield as of 05/31/2009 is -0.84%, which more closely reflects current earnings. (16)									
Bonds									
High Yield Bond									
ING PIMCO High Yield Portfolio - Service Class - 787	-9.94	-0.65	2.48	2.21	-14.45	-2.33	1.65	1.39	05/03/2004
ING Pioneer High Yield Portfolio - Initial Class - 1220	-12.92	-0.90		-0.81	-17.28	-2.58		-2.29	01/03/2006
Pioneer High Yield VCT Portfolio - Class I - 834	-20.93	-4.35	-0.49	4.30	-24.89	-5.97	-1.30	4.07	05/01/2000
Inflation-Protected Bond									
American Century Inflation-Adjusted Bond Fund - Inv - 1001									02/10/1997
Intermediate Government									
PIMCO VIT Real Return Portfolio - Admin Class - 833	-3.26	3.32	2.99	6.32	-8.10	1.57	2.15	6.10	09/30/1999
Intermediate-Term Bond									
ING Intermediate Bond Portfolio - Class I - 004	-7.23	-0.06	1.01	3.19	-11.87	-1.76	0.19	3.19	05/23/1973
ING PIMCO Total Return Portfolio - Service Class - 439	1.79	5.33	3.93	4.10	-3.31	3.55	3.09	3.65	05/01/2002
ING U.S. Bond Index Portfolio - Class I - 1554	4.32			3.01	-0.90			-1.17	03/04/2008

Investment Options	Without a Deferred Sales Charge				With a Deferred Sales Charge				Fund Inception Date
	1-Yr	3-Yr	5-Yr	10-Yr / Inception	1-Yr	3-Yr	5-Yr	10-Yr / Inception	
The Bond Fund of AmericaSM - Class R-4 - 1003 (7)	-8.37	-0.87	0.69	2.97	-12.96	-2.55	-0.13	2.97	05/28/1974
Multi-Sector Bond									
ING Oppen Strat Inc-Int / Janus Aspen Flexible Inc-Inst (8)	-14.25	0.32	1.20	3.19	-18.54	-1.38	0.37	3.19	09/13/1993
ING Oppenheimer Strategic Income Portfolio - Initial Class - 422	-14.25	0.32		0.52	-18.54	-1.38		-0.61	11/08/2004
World Bond									
Templeton Global Bond Fund - Class A - 178	8.99	9.24	9.05	8.39	3.54	7.38	8.17	8.39	09/18/1986
Asset Allocation									
Lifecycle									
ING Solution 2015 Portfolio - Service Class - 747	-23.04	-5.24		-2.06	-26.89	-6.84		-3.29	04/29/2005
ING Solution 2025 Portfolio - Service Class - 759	-28.97	-7.97		-3.45	-32.52	-9.53		-4.65	04/29/2005
ING Solution 2035 Portfolio - Service Class - 762	-31.44	-8.73		-3.65	-34.87	-10.27		-4.85	04/29/2005
ING Solution 2045 Portfolio - Service Class - 765	-34.04	-9.78		-3.92	-37.34	-11.31		-5.12	04/29/2005
ING Solution Growth & Income Portfolio - Service Class - 1601	-19.84			-10.67	-23.85			-13.03	07/02/2007
ING Solution Growth Portfolio - Service Class - 1602	-27.09			-15.94	-30.74			-18.17	07/02/2007
ING Solution Income Portfolio - Service Class - 768	-14.20	-1.72		-0.53	-18.49	-3.39		-1.77	04/29/2005
Lifestyle									
ING Strategic Allocation Conservative Portfolio - Class I - 033	-21.10	-5.12	-1.16	0.49	-25.04	-6.73	-1.97	0.49	07/05/1995
ING Strategic Allocation Growth Portfolio - Class I - 031	-32.09	-9.63	-2.61	-1.40	-35.49	-11.16	-3.41	-1.40	07/05/1995
ING Strategic Allocation Moderate Portfolio - Class I - 032	-26.79	-7.40	-1.91	-0.61	-30.46	-8.97	-2.70	-0.61	07/05/1995
Balanced									
Moderate Allocation									
Calvert Variable Series, Inc. Social Balanced Portfolio - 101	-25.73	-7.48	-2.62	-1.24	-29.45	-9.05	-3.41	-1.24	09/02/1986
ING Balanced Portfolio, Inc. - Class I - 008	-25.41	-6.72	-1.84	-0.23	-29.14	-8.30	-2.64	-0.23	04/03/1989
ING MFS Total Return Portfolio - Service Class - 616	-18.60	-3.77	0.23	2.21	-22.68	-5.40	-0.59	2.21	08/14/1998
ING T. Rowe Price Capital Appreciation Port - Serv Class - 788	-21.29	-3.14	2.57	6.40	-25.23	-4.79	1.73	6.40	01/24/1989
ING Van Kampen Equity and Inc-I/Janus Asp Balanced-I (8)	-20.47	-4.75	-0.15	0.94	-24.45	-6.36	-0.96	0.94	09/13/1993
ING Van Kampen Equity and Income Portfolio - Initial Class - 452	-20.47	-4.75	0.66	-0.03	-24.45	-6.36	-0.16	-0.44	12/10/2001
Pax World Balanced Fund - 193	-26.44	-5.69	-0.24	0.93	-30.12	-7.29	-1.05	0.93	08/10/1971
Large Cap Value									
Large Blend									
AIM V.I. Core Equity Fund - Series I Shares - 079	-26.58	-4.59	-0.07	-1.73	-30.25	-6.21	-0.88	-1.73	05/02/1994
Fundamental InvestorsSM - Class R-4 - 1208	-34.19	-7.00	1.64	1.59	-37.49	-8.57	0.82	1.59	08/01/1978
ING Davis New York Venture Portfolio - Service Class - 264	-33.86	-9.77	-4.07	-1.79	-37.17	-11.30	-4.85	-2.19	12/10/2001
ING Growth and Income II Portfolio - Service Class - 753	-44.08	-21.46	-11.70	-8.47	-46.88	-22.80	-12.42	-8.80	10/02/2000
ING Growth and Income Portfolio - Class I - 001	-31.07	-8.15	-1.99	-3.97	-34.52	-9.70	-2.79	-3.97	12/31/1979
ING Index Plus LargeCap Portfolio - Class I - 035	-33.33	-10.09	-3.59	-3.10	-36.67	-11.62	-4.37	-3.10	09/16/1996
ING Janus Contrarian Portfolio - Service Class - 1307	-41.47	-7.92	1.24	-0.30	-44.40	-9.49	0.42	-0.65	10/02/2000
ING Neuberger Berman Partners Portfolio - Service Class - 1131	-42.48	-11.80		-10.87	-45.36	-13.29		-12.21	01/03/2006
ING Oppenheimer Main Street Portfolio - Service Class - 786	-32.07	-9.14	-2.58	-3.15	-35.47	-10.69	-3.37	-3.15	08/14/1998
ING Pioneer Fund Port - Inst/Pioneer Fund VCT - I ++ (3)	-33.63	-9.25	-2.02	-1.56	-36.95	-10.79	-2.81	-1.56	10/31/1997
ING Pioneer Fund Portfolio - Institutional Class - 772	-33.63	-9.08		-3.47	-36.95	-10.63		-4.67	04/29/2005
ING Russell Large Cap Index Portfolio - Class I - 1557	-32.74			-22.20	-36.11			-25.36	03/04/2008
ING Thornburg Value Portfolio - Initial Class - 100	-26.27	-6.01	-1.17	-2.67	-29.96	-7.60	-1.98	-2.67	11/28/1997
ING UBS U.S. Large Cap Equity Portfolio - Initial Class - 105	-34.69	-10.60	-2.76	-3.17	-37.96	-12.12	-3.55	-3.17	11/28/1997
Neuberger Berman Socially Responsive Fund® - Trust Class - 1120	-33.35	-8.40	-1.10	0.08	-36.69	-9.96	-1.90	0.08	03/16/1994
Large Value									
Amana Income Fund - 1595	-22.85	-0.91	7.40	3.36	-26.71	-2.59	6.53	3.36	06/23/1986
Fidelity® VIP Equity-Income Portfolio - Initial Class - 108	-37.33	-12.16	-3.92	-1.51	-40.47	-13.65	-4.70	-1.51	10/09/1986

Investment Options	Without a Deferred Sales Charge 1-Yr	3-Yr	5-Yr	10-Yr / Inception	With a Deferred Sales Charge 1-Yr	3-Yr	5-Yr	10-Yr / Inception	Fund Inception Date
ING American Century Large Company Value Portfolio - Service - 263	-34.18	-11.71	-5.02	-3.25	-37.48	-13.21	-5.79	-3.65	12/10/2001
ING JPMorgan Value Opportunities Portfolio - Service Class - 1187	-33.13	-10.98		-6.01	-36.47	-12.49		-7.18	04/29/2005
ING Lord Abbett Affiliated Portfolio - Inst Class - 1201 (4)	-33.48	-10.84	-3.15	-1.04	-36.81	-12.35	-3.93	-1.26	02/01/2000
ING Opportunistic LargeCap Portfolio - Class I - 041	-35.74	-11.82	-4.07	-2.02	-38.96	-13.31	-4.85	-2.02	12/13/1996
ING Pioneer EqInc Port-Inst/Pioneer EqtyInc VCT - I ++ (3)	-36.38	-10.14	-1.70	-0.50	-39.57	-11.66	-2.50	-0.50	03/01/1995
ING Pioneer Equity Income Portfolio - Institutional Class - 1213	-36.38			-22.61	-39.57			-24.52	05/11/2007
ING T. Rowe Price Equity Income Portfolio - Service Class - 617	-33.18	-9.88	-2.43	0.02	-36.53	-11.41	-3.22	0.02	01/24/1989
ING Van Kampen Comstock Portfolio - Service Class - 437	-31.53	-11.68	-3.73	-1.52	-34.95	-13.17	-4.51	-1.94	05/01/2002
ING Van Kampen Growth and Income Portfolio - Service Class - 789	-29.96	-9.01	-1.09	-0.97	-33.46	-10.55	-1.89	-0.97	10/04/1993
RiverSource Diversified Equity Income Fund - Class R4 - 1377	-37.49	-12.50	-0.43	0.89	-40.61	-13.98	-1.24	0.89	10/15/1990
Washington Mutual Investors FundSM - Class R-4 - 819 (9)	-32.38	-9.24	-2.99	-0.81	-35.76	-10.78	-3.78	-0.81	07/31/1952
Large Cap Growth									
Large Growth									
AIM V.I. Capital Appreciation Fund - Series I Shares - 076	-38.85	-12.42	-5.16	-3.69	-41.91	-13.90	-5.93	-3.69	05/05/1993
Alger Green Fund - Class A - 1584									12/04/2000
Amana Growth Fund - 1612	-24.46	-2.56	6.61	5.41	-28.24	-4.21	5.75	5.41	02/03/1994
Fidelity® VIP Contrafund® Portfolio - Initial Class - 133	-34.81	-8.19	0.32	1.19	-38.07	-9.75	-0.50	1.19	01/03/1995
Fidelity® VIP Growth Portfolio - Initial Class - 109	-41.33	-9.96	-4.60	-4.20	-44.27	-11.48	-5.38	-4.20	10/09/1986
ING BlackRock Large Cap Growth Portfolio - Inst Class - 2015	-29.96	-9.22	-2.48	-1.75	-33.46	-10.76	-3.28	-2.17	05/01/2002
ING Legg Mason Partners Aggressive Growth Port - Initial Cla - 106	-33.19	-11.67	-3.91	-5.69	-36.53	-13.17	-4.69	-5.69	11/28/1997
ING Marsico Growth Portfolio - Institutional Class - 1413 (5)	-31.15	-8.41	-1.87	-3.66	-34.59	-9.97	-2.67	-3.66	08/14/1998
ING Opportunistic Large Cap Growth Portfolio - Class I - 040	-35.13	-10.30	-4.15	-5.24	-38.38	-11.82	-4.93	-5.24	12/13/1996
ING T. Rowe Price Growth Equity Portfolio - Initial Class - 111	-32.18	-7.53	-1.98	-0.75	-35.58	-9.10	-2.78	-0.75	11/28/1997
ING Van Kampen Capital Growth Portfolio - Institutional Cl - 1577 (6)	-35.07	-6.02	-1.00	-1.30	-38.32	-7.61	-1.81	-1.73	05/01/2002
The Growth Fund of America® - Class R-4 - 572 (10)	-32.16	-7.30	-0.24	2.19	-35.56	-8.87	-1.05	2.19	12/01/1973
Small/Mid/Specialty									
Mid-Cap Blend									
AIM Mid Cap Core Equity Fund - Class A - 290	-23.39	-3.53	0.92	6.29	-27.22	-5.17	0.10	6.29	06/09/1987
BlackRock Mid Cap Value Opportunities Fund - Inv A Shares - 7280									02/01/1995
ING Index Plus MidCap Portfolio - Class I - 053	-35.87	-11.07	-2.24	3.59	-39.08	-12.58	-3.04	3.59	12/16/1997
ING Russell Mid Cap Index Portfolio - Class I - 1560	-37.10			-22.72	-40.25			-25.86	03/04/2008
Premier VIT OpCap Mid Cap Portfolio - 1333	-37.27	-10.57	-0.20	6.76	-40.41	-12.09	-1.01	6.76	02/09/1998
Mid-Cap Growth									
ING AllianceBernstein Mid Cap Growth - Service Class - 754	-36.49	-13.14	-4.74	-2.67	-39.67	-14.62	-5.52	-2.67	08/14/1998
ING Baron Asset Portfolio - Service Class - 1245 (11)	-34.20	-10.24		-11.02	-37.49	-11.77		-12.49	05/03/2006
ING FMR Diversified Mid Cap Portfolio - Service Class - 778	-29.56	-6.93	4.03	1.98	-33.09	-8.51	3.18	1.62	10/02/2000
ING MidCap Opportunities Portfolio - Class I - 081	-31.32	-4.85	1.30	-4.79	-34.76	-6.46	0.48	-5.00	05/05/2000
ING T. Rowe Price Div MidCap-I/Janus Aspen MidCap - I (8)	-34.39	-7.88	-0.36	-3.24	-37.67	-9.44	-1.17	-3.24	09/13/1993
ING T. Rowe Price Diversified Mid Cap Gr Port-Initial Cl - 449	-34.39	-7.88	-1.82	-0.83	-37.67	-9.44	-2.62	-1.23	12/10/2001
Wanger Select - 820	-38.31	-9.17	-0.48	4.35	-41.40	-10.71	-1.29	4.35	02/01/1999
Mid-Cap Value									
Columbia Mid Cap Value Fund - Class A - 1008	-37.58	-11.00	-0.34	2.89	-40.70	-12.51	-1.15	2.47	11/20/2001

Investment Options	Without a Deferred Sales Charge				With a Deferred Sales Charge				Fund Inception Date
	1-Yr	3-Yr	5-Yr	10-Yr / Inception	1-Yr	3-Yr	5-Yr	10-Yr / Inception	
ING JPMorgan Mid Cap Value Portfolio - Service Class - 435	-33.38	-9.73	-1.37	2.16	-36.71	-11.26	-2.17	1.72	05/01/2002
ING Pioneer MdCp Val Port-Inst/Pioneer MdCp Val VCT-I ++ (3)	-29.90	-7.48	-0.30	4.40	-33.41	-9.05	-1.12	4.40	03/01/1995
ING Pioneer Mid Cap Value Portfolio - Institutional Class - 1214	-29.90	-7.47		-3.14	-33.41	-9.04		-4.35	05/02/2005
Lazard U.S. Mid Cap Portfolio - Open Shares - 1315	-32.97	-11.10	-2.44	2.79	-36.32	-12.61	-3.23	2.79	11/04/1997
Lord Abbett Series Fund - Mid-Cap Value Port - Cl VC Shares - 075	-36.87	-12.82	-3.58	4.47	-40.03	-14.30	-4.36	4.26	09/15/1999
Small Blend									
ING Index Plus SmallCap Portfolio - Class I - 052	-33.53	-14.02	-3.28	2.31	-36.85	-15.48	-4.07	2.31	12/19/1997
ING JPMorgan Small Cap Core Equity Portfolio - Service Class - 752	-29.07	-9.44	-0.26	0.92	-32.62	-10.97	-1.07	0.48	05/01/2002
ING Russell Small Cap Index Portfolio - Class I - 1563	-32.79			-18.19	-36.16			-21.51	03/04/2008
ING Small Company Portfolio - Class I - 042	-30.82	-8.02	0.77	3.88	-34.28	-9.58	-0.05	3.88	12/27/1996
Loomis Sayles Small Cap Value - Retail Class - 1117 (12)	-29.68	-9.03	0.20	5.07	-33.20	-10.57	-0.62	5.07	05/13/1991
Oppenheimer Main Street® Small Cap/VA - 832	-29.86	-10.53	-0.36	4.09	-33.37	-12.05	-1.17	4.09	05/01/1998
Small Growth									
ING Baron Small Cap Growth Portfolio - Service Class - 436	-32.07	-10.61	-0.75	2.48	-35.47	-12.12	-1.56	2.04	05/01/2002
ING SmallCap Opportunities Portfolio - Class I - 080	-33.76	-8.51	-0.41	0.66	-37.08	-10.06	-1.22	0.66	05/06/1994
Wanger USA - 821	-35.00	-11.19	-2.27	2.50	-38.25	-12.69	-3.07	2.50	05/03/1995
Small Value									
Evergreen Special Values Fund - Class A - 191	-32.64	-11.75	-1.32	4.89	-36.01	-13.25	-2.12	4.89	05/07/1993
Franklin Small Cap Value Securities Fund - Class 2 - 073 (13)	-34.55	-11.09	-0.35	4.77	-37.82	-12.60	-1.16	4.77	05/01/1998
ING American Century Small-Mid Cap Value Port - Serv Class - 440	-24.94	-7.40	0.08	1.95	-28.70	-8.97	-0.74	1.52	05/01/2002
ING Columbia Small Cap Value Portfolio - Service Class - 1218	-34.56	-11.31		-12.44	-37.83	-12.82		-13.89	05/01/2006
ING Wells Fargo Small Cap Disciplined Portfolio - Serv Class - 1116	-26.68	-10.41		-7.04	-30.35	-11.93		-8.39	11/30/2005
Specialty - Health									
ING Evergreen Health Sciences Portfolio - Service Class - 776	-25.14	-6.35	-1.53	-1.86	-28.89	-7.94	-2.33	-2.64	05/03/2004
Specialty - Natural Resources									
ING Global Resources Portfolio - Service Class - 2040	-38.02	-1.43	11.56	7.52	-41.12	-3.10	10.66	7.52	01/24/1989
Specialty - Real Estate									
ING Clarion Global Real Estate Portfolio - Inst Class - 1613	-40.11	-10.92		-9.02	-43.11	-12.43		-10.38	01/03/2006
ING Clarion Real Estate Portfolio - Service Class - 1019	-47.78	-16.78	-1.08	4.99	-50.40	-18.20	-1.88	4.99	01/24/1989
Specialty - Technology									
ING BlackRock Science and Technology Opp Port - Class I - 050	-26.48	-4.57	0.00	-10.94	-30.16	-6.19	-0.82	-11.14	05/01/2000
Specialty - Utilities									
ING MFS Utilities Portfolio - Service Class - 771	-34.70	0.49		5.28	-37.97	-1.21		3.97	05/02/2005
Global / International									
Diversified Emerging Mkts									
ING JPMorgan Emerging Markets Equity Portfolio - Service Cla - 779	-33.73	3.78	13.92	7.23	-37.04	2.02	12.99	7.23	02/18/1998
Oppenheimer Developing Markets Fund - Class A - 190	-28.52	4.48	17.15	16.21	-32.09	2.70	16.19	16.21	11/18/1996
Pioneer Emerging Markets VCT Portfolio - Class I - 1331	-41.75	-0.47	12.87	8.85	-44.66	-2.15	11.95	8.85	10/30/1998
Foreign Large Blend									
EuroPacific Growth Fund® - Class R-4 - 573 (14)	-31.04	-3.59	5.51	4.43	-34.49	-5.22	4.65	4.43	04/16/1984
Fidelity® VIP Overseas Portfolio - Initial Class - 107	-39.83	-9.17	0.84	0.13	-42.84	-10.71	0.02	0.13	01/28/1987
ING Artio Foreign Portfolio - Service Class - 830	-40.51	-8.86	2.69	2.60	-43.48	-10.41	1.85	2.15	05/01/2002
ING Index Plus International Equity Port - Inst Class - 1049	-37.98	-9.89		-3.44	-41.08	-11.42		-4.72	07/29/2005
ING International Index Portfolio - Class I - 1551	-37.08			-25.95	-40.23			-28.96	03/04/2008
Foreign Large Growth									
Artisan International Fund - Investor Shares - 1252	-38.57	-7.41	2.63	3.58	-41.64	-8.98	1.79	3.58	12/28/1995

Investment Options	Without a Deferred Sales Charge				With a Deferred Sales Charge				Fund Inception Date
	1-Yr	3-Yr	5-Yr	10-Yr / Inception	1-Yr	3-Yr	5-Yr	10-Yr / Inception	
ING Marsico International Opportunities Port - Serv Class - 770	-39.06	-6.94		1.93	-42.11	-8.52		0.66	05/02/2005
Foreign Large Value									
ING International Value Portfolio - Class I - 228	-33.92	-5.96	2.74	3.91	-37.22	-7.56	1.90	3.91	08/08/1997
ING Templeton Foreign Equity Portfolio - Initial Class - 1586	-33.60	-5.61		-3.93	-36.92	-7.21		-5.37	01/03/2006
Foreign Small/Mid Growth									
Wanger International - 1348	-35.43	-5.15	7.77	7.57	-38.66	-6.75	6.89	7.57	05/03/1995
World Stock									
ING Oppenheimer Global-Int/Janus Aspen Worldwide Gr-Inst (8)	-30.67	-8.01	0.15	-1.33	-34.14	-9.57	-0.67	-1.33	09/13/1993
ING Oppenheimer Global Portfolio - Initial Class - 432	-30.67	-8.01	0.81	2.02	-34.14	-9.57	-0.01	1.58	05/01/2002
ING Templeton Global Growth Portfolio - Service Class - 1232	-32.12	-9.75	-1.55	1.80	-35.52	-11.29	-2.35	1.80	10/21/1992
New Perspective Fund® - Class R-4 - 818 (15)	-30.24	-4.29	2.71	3.40	-33.73	-5.92	1.87	3.40	03/13/1973
SMALLCAP World Fund® - Class R-4 - 1445	-36.86	-8.57	1.68	7.02	-40.02	-10.12	0.85	6.39	07/24/2002

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.

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.

P E R F O R M A N C E   U P D A T E

ING Life Insurance and Annuity Company

NORTHWESTERN STATE UNIVERSITY

Variable Annuity Account C, Standardized Returns with a Deferred Sales Charge

Average Annual Total Returns as of: 03/31/2009 (shown in percentages)

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 1.00% on an annual basis, a pro-rata portion of the Maintenance / Administrative Fee of $15.00 deducted annually, and the applicable deferred sales charge, which declines over 10 years as follows: 5%, 5%, 5%, 5%, 5%, 4%, 4%, 3%, 3%, 2%. They also assume reinvestment of all dividends (ordinary income and capital gains) and are net of management fees and other fund operating expenses.

Returns less than one year are not annualized. VAA Inception Date is the date on which contributions were first received in this fund under the Variable Annuity Account, and is the date used in calculating the periodic returns.

Investment Options	1-Mo	3-Mos	YTD	1-Yr	3-Yr	5-Yr	10-Yr	Incept	VAA Inception Date
Stability of Principal									
Money Market									
ING Money Market Portfolio - Class I - 003 (2)	-5.12	-5.17	-5.17	-4.30	1.07	1.40	2.25		09/30/1975
The 7-day annualized Subaccount yield as of 03/31/2009 is -0.74%, which more closely reflects current earnings. (16)									
Bonds									
High Yield Bond									
ING PIMCO High Yield Portfolio - Service Class - 787	-1.73	-4.70	-4.70	-25.22	-7.73			-4.28	05/06/2005
ING Pioneer High Yield Portfolio - Initial Class - 1220	-4.16	-2.88	-2.88	-29.14				-9.32	05/02/2006
Pioneer High Yield VCT Portfolio - Class I - 834	-4.11	-1.98	-1.98	-34.17	-11.52			-5.49	05/03/2004
Inflation-Protected Bond									
American Century Inflation-Adjusted Bond Fund - Inv - 1001									
Intermediate Government									
PIMCO VIT Real Return Portfolio - Admin Class - 833	0.45	0.75	0.75	-11.28	1.13			1.91	05/03/2004
Intermediate-Term Bond									
ING Intermediate Bond Portfolio - Class I - 004	-4.45	-7.27	-7.27	-15.52	-2.98	-1.04	2.73		05/31/1978
ING PIMCO Total Return Portfolio - Service Class - 439	-2.21	-5.56	-5.56	-9.01	1.57	1.39		2.79	05/03/2002
ING U.S. Bond Index Portfolio - Class I - 1554	-3.82	-5.11	-5.11					-2.98	05/16/2008
The Bond Fund of AmericaSM - Class R-4 - 1003 (7)	-4.17	-5.57	-5.57					-17.44	05/14/2008
Multi-Sector Bond									
ING Oppen Strat Inc-Int / Janus Aspen Flexible Inc-Inst (8)	-3.24	-8.91	-8.91	-25.20	-4.59	-2.10	2.18		10/31/1994
ING Oppenheimer Strategic Income Portfolio - Initial Class - 422	-3.24	-9.11	-9.11	-25.20	-4.59			-2.80	03/23/2005
World Bond									
Templeton Global Bond Fund - Class A - 178	0.80	-5.16	-5.16	-6.34	6.03			6.59	05/03/2004
Asset Allocation									
Lifecycle									
ING Solution 2015 Portfolio - Service Class - 747	0.07	-12.58	-12.58	-33.71	-11.23			-6.86	05/06/2005
ING Solution 2025 Portfolio - Service Class - 759	1.19	-14.60	-14.60	-39.69	-14.74			-8.85	05/13/2005
ING Solution 2035 Portfolio - Service Class - 762	1.80	-15.23	-15.23	-42.19	-15.96			-9.53	05/12/2005
ING Solution 2045 Portfolio - Service Class - 765	2.41	-15.93	-15.93	-44.60	-17.31			-10.66	05/20/2005
ING Solution Growth & Income Portfolio - Service Class - 1601	-0.53	-11.88	-11.88					-29.55	06/23/2008
ING Solution Growth Portfolio - Service Class - 1602	0.81	-14.06	-14.06					-34.06	07/28/2008

Investment Options	1-Mo	3-Mos	YTD	1-Yr	3-Yr	5-Yr	10-Yr	Incept	VAA Inception Date
ING Solution Income Portfolio - Service Class - 768	-1.61	-9.95	-9.95	-24.62	-6.62			-4.51	05/25/2005
Lifestyle									
ING Strategic Allocation Conservative Portfolio - Class I - 033	-1.97	-13.71	-13.71	-31.54	-10.50	-4.56	-0.33		07/05/1995
ING Strategic Allocation Growth Portfolio - Class I - 031	1.00	-17.36	-17.36	-42.65	-16.55	-6.95	-2.45		07/05/1995
ING Strategic Allocation Moderate Portfolio - Class I - 032	-0.49	-15.51	-15.51	-37.16	-13.63	-5.78	-1.57		07/05/1995
Balanced									
Moderate Allocation									
Calvert Variable Series, Inc. Social Balanced Portfolio - 101	-0.62	-8.42	-8.42	-33.98	-12.48	-5.46	-2.49		05/31/1989
ING Balanced Portfolio, Inc. - Class I - 008	-0.42	-13.04	-13.04	-33.40	-11.95	-4.96	-1.14		04/03/1989
ING MFS Total Return Portfolio - Service Class - 616	0.54	-11.43	-11.43	-28.05	-8.75	-2.95		-0.24	05/08/2003
ING T. Rowe Price Capital Appreciation Port - Serv Class - 788	1.94	-8.99	-8.99	-31.95	-9.66			-4.70	05/05/2005
ING Van Kampen Equity and Inc-I/Janus Asp Balanced-I (8)	0.00	-12.88	-12.88	-29.42	-9.51	-3.27	-0.10		06/30/1995
ING Van Kampen Equity and Income Portfolio - Initial Class - 452	0.00	-12.88	-12.88	-29.42	-9.51			-4.93	03/22/2005
Pax World Balanced Fund - 193	-0.59	-8.93	-8.93	-32.80	-10.75	-3.05		-1.91	02/21/2001
Large Cap Value									
Large Blend									
AIM V.I. Core Equity Fund - Series I Shares - 079	2.59	-14.18	-14.18	-36.73	-11.43	-3.65		-3.73	05/10/1999
Fundamental InvestorsSM - Class R-4 - 1208	2.62	-11.74	-11.74					-46.65	05/14/2008
ING Davis New York Venture Portfolio - Service Class - 264	4.53	-16.82	-16.82	-45.05	-17.23	-8.94		-5.15	05/21/2002
ING Growth and Income II Portfolio - Service Class - 753	3.25	-17.60	-17.60	-54.99	-29.26			-20.86	05/04/2005
ING Growth and Income Portfolio - Class I - 001	3.04	-13.21	-13.21	-39.88	-15.11	-5.96	-5.33		05/01/1975
ING Index Plus LargeCap Portfolio - Class I - 035	2.34	-16.92	-16.92	-41.43	-16.38	-7.09	-4.46		10/31/1996
ING Janus Contrarian Portfolio - Service Class - 1307	-1.83	-21.08	-21.08	-56.20				-36.47	04/27/2007
ING Neuberger Berman Partners Portfolio - Service Class - 1131	4.36	-10.84	-10.84	-51.87				-21.39	05/31/2006
ING Oppenheimer Main Street Portfolio - Service Class - 786	4.30	-14.10	-14.10	-41.01	-16.42			-10.53	05/19/2005
ING Pioneer Fund Port - Inst/Pioneer Fund VCT - I ++ (3)	2.44	-16.07	-16.07	-41.29	-14.64	-5.31		-2.29	09/27/2001
ING Pioneer Fund Portfolio - Institutional Class - 772	2.44	-16.07	-16.07	-41.29				-15.70	05/11/2006
ING Russell Large Cap Index Portfolio - Class I - 1557	2.88	-15.82	-15.82					-44.46	05/14/2008
ING Thornburg Value Portfolio - Initial Class - 100	3.67	-12.56	-12.56	-41.15	-14.86	-6.50	-4.20		11/28/1997
ING UBS U.S. Large Cap Equity Portfolio - Initial Class - 105	3.67	-15.54	-15.54	-44.10	-17.95	-7.27	-4.86		11/28/1997
Neuberger Berman Socially Responsive Fund® - Trust Class - 1120	2.39	-10.91	-10.91	-40.85				-15.75	05/04/2006
Large Value									
Amana Income Fund - 1595	0.09	-12.24	-12.24					-21.78	09/29/2008
Fidelity® VIP Equity-Income Portfolio - Initial Class - 108	4.76	-17.84	-17.84	-48.24	-19.03	-8.52	-2.85		05/31/1994
ING American Century Large Company Value Portfolio - Service - 263	3.98	-19.10	-19.10	-44.52	-17.67	-9.11		-5.64	05/07/2002
ING JPMorgan Value Opportunities Portfolio - Service Class - 1187	3.30	-16.71	-16.71	-43.62				-18.83	05/02/2006
ING Lord Abbett Affiliated Portfolio - Inst Class - 1201 (4)	5.67	-20.69	-20.69	-44.76				-18.30	05/03/2006
ING Opportunistic LargeCap Portfolio - Class I - 041	1.14	-20.75	-20.75	-43.22	-17.10	-7.42	-2.94		05/30/1997
ING Pioneer EqInc Port-Inst/Pioneer EqtyInc VCT - I ++ (3)	-0.18	-19.76	-19.76	-40.83	-14.05	-4.35		-2.59	07/26/2001
ING Pioneer Equity Income Portfolio - Institutional Class - 1213	-0.18	-19.76	-19.76	-40.83				-31.15	05/31/2007
ING T. Rowe Price Equity Income Portfolio - Service Class - 617	3.88	-20.09	-20.09	-44.50	-16.54	-6.60		-2.61	05/12/2003
ING Van Kampen Comstock Portfolio - Service Class - 437	5.57	-17.41	-17.41	-42.78	-17.52	-7.74		-4.26	05/06/2002
ING Van Kampen Growth and Income Portfolio - Service Class - 789	2.49	-17.91	-17.91	-38.77	-14.50			-8.54	05/02/2005
RiverSource Diversified Equity Income Fund - Class R4 - 1377	4.27	-17.26	-17.26					-50.28	05/19/2008
Washington Mutual Investors FundSM - Class R-4 - 819 (9)	2.00	-17.79	-17.79	-40.73	-14.43			-6.52	05/03/2004
Large Cap Growth									
Large Growth									

Investment Options	1-Mo	3-Mos	YTD	1-Yr	3-Yr	5-Yr	10-Yr	Incept	VAA Inception Date
AIM V.I. Capital Appreciation Fund - Series I Shares - 076	-1.09	-13.83	-13.83	-42.31	-18.53	-8.20		-4.99	05/07/1999
Alger Green Fund - Class A - 1584									
Amana Growth Fund - 1612	0.72	-7.18	-7.18					-22.13	09/29/2008
Fidelity® VIP Contrafund® Portfolio - Initial Class - 133	3.87	-13.40	-13.40	-44.10	-15.38	-3.96	-0.59		05/31/1995
Fidelity® VIP Growth Portfolio - Initial Class - 109	1.29	-12.61	-12.61	-47.04	-16.44	-8.26	-5.63		05/31/1994
ING BlackRock Large Cap Growth Portfolio - Inst Class - 2015	3.18	-10.41	-10.41	-36.73				-28.18	04/27/2007
ING Legg Mason Partners Aggressive Growth Port - Initial Cla - 106	1.23	-12.43	-12.43	-41.65	-18.74	-8.15	-6.83		11/28/1997
ING Marsico Growth Portfolio - Institutional Class - 1413 (5)	0.95	-13.06	-13.06					-44.14	04/25/2008
ING Opportunistic Large Cap Growth Portfolio - Class I - 040	1.09	-9.52	-9.52	-40.48	-16.75	-7.30	-6.46		05/30/1997
ING T. Rowe Price Growth Equity Portfolio - Initial Class - 111	3.04	-5.19	-5.19	-38.06	-13.92	-5.48	-2.06		11/28/1997
ING Van Kampen Capital Growth Portfolio - Institutional Cl - 1577 (6)	4.40	-1.34	-1.34					-47.73	04/25/2008
The Growth Fund of America® - Class R-4 - 572 (10)	2.93	-9.08	-9.08	-40.34	-14.10			-4.28	05/03/2004
Small/Mid/Specialty									
Mid-Cap Blend									
AIM Mid Cap Core Equity Fund - Class A - 290	0.81	-12.48	-12.48	-33.60	-10.48			-3.05	07/14/2004
BlackRock Mid Cap Value Opportunities Fund - Inv A Shares - 7280									
ING Index Plus MidCap Portfolio - Class I - 053	3.15	-14.74	-14.74	-41.29	-17.76	-6.11	2.58		05/04/1998
ING Russell Mid Cap Index Portfolio - Class I - 1560	3.43	-13.88	-13.88					-50.66	05/15/2008
Premier VIT OpCap Mid Cap Portfolio - 1333	2.81	-10.99	-10.99	-43.36				-31.02	05/24/2007
Mid-Cap Growth									
ING AllianceBernstein Mid Cap Growth - Service Class - 754	4.93	-7.87	-7.87	-43.59	-21.81			-11.98	06/07/2005
ING Baron Asset Portfolio - Service Class - 1245 (11)	3.81	-12.46	-12.46	-41.51				-17.81	05/03/2006
ING FMR Diversified Mid Cap Portfolio - Service Class - 778	3.02	-9.18	-9.18	-39.44	-14.21			-5.20	05/04/2005
ING MidCap Opportunities Portfolio - Class I - 081	2.94	-9.60	-9.60	-38.61	-12.61	-2.77		-2.09	08/02/2001
ING T. Rowe Price Div MidCap-I/Janus Aspen MidCap - I (8)	4.11	-7.36	-7.36	-41.34	-16.08	-4.53	-4.47		06/30/1994
ING T. Rowe Price Diversified Mid Cap Gr Port-Initial Cl - 449	4.11	-7.36	-7.36	-41.34	-16.08	-6.54		0.88	12/26/2002
Wanger Select - 820	3.69	-7.90	-7.90	-45.82	-17.89			-5.92	05/03/2004
Mid-Cap Value									
Columbia Mid Cap Value Fund - Class A - 1008	2.56	-16.66	-16.66					-50.13	05/13/2008
ING JPMorgan Mid Cap Value Portfolio - Service Class - 435	0.61	-18.05	-18.05	-40.67	-15.77	-4.88		-0.53	05/03/2002
ING Pioneer MdCp Val Port-Inst/Pioneer MdCp Val VCT-I ++ (3)	0.73	-14.42	-14.42	-37.01	-14.09	-3.80		0.79	08/09/2001
ING Pioneer Mid Cap Value Portfolio - Institutional Class - 1214	0.73	-14.42	-14.42	-37.01				-14.98	05/08/2006
Lazard U.S. Mid Cap Portfolio - Open Shares - 1315	2.00	-14.14	-14.14	-43.05				-33.86	05/10/2007
Lord Abbett Series Fund - Mid-Cap Value Port - Cl VC Shares - 075	2.01	-16.48	-16.48	-42.05	-18.78	-7.09		-2.07	07/26/2001
Small Blend									
ING Index Plus SmallCap Portfolio - Class I - 052	2.39	-20.71	-20.71	-42.19	-21.54	-7.75	1.20		05/04/1998
ING JPMorgan Small Cap Core Equity Portfolio - Service Class - 752	2.75	-16.36	-16.36	-36.92	-16.93			-9.05	06/03/2005
ING Russell Small Cap Index Portfolio - Class I - 1563	3.16	-19.61	-19.61					-45.81	05/15/2008
ING Small Company Portfolio - Class I - 042	2.04	-18.42	-18.42	-39.26	-15.83	-4.45	2.97		05/30/1997
Loomis Sayles Small Cap Value - Retail Class - 1117 (12)	3.08	-16.02	-16.02					-41.36	05/13/2008
Oppenheimer Main Street® Small Cap/VA - 832	5.49	-18.63	-18.63	-43.95	-20.91			-7.45	09/22/2004
Small Growth									
ING Baron Small Cap Growth Portfolio - Service Class - 436	3.86	-11.29	-11.29	-40.53	-18.03	-4.86		-0.53	05/01/2002
ING SmallCap Opportunities Portfolio - Class I - 080	0.59	-17.51	-17.51	-40.98	-16.88	-5.02		-7.91	08/03/2001
Wanger USA - 821	3.25	-13.75	-13.75	-42.03	-18.70			-6.24	05/03/2004
Small Value									

Investment Options	1-Mo	3-Mos	YTD	1-Yr	3-Yr	5-Yr	10-Yr	Incept	VAA Inception Date
Evergreen Special Values Fund - Class A - 191	4.64	-18.26	-18.26	-41.96	-18.69	-5.35		1.46	01/16/2001
Franklin Small Cap Value Securities Fund - Class 2 - 073 (13)	4.16	-20.66	-20.66	-45.13	-19.54	-5.65		-0.49	08/31/2001
ING American Century Small-Mid Cap Value Port - Serv Class - 440	3.01	-16.92	-16.92	-35.19	-15.14	-4.07		-1.22	05/02/2002
ING Columbia Small Cap Value Portfolio - Service Class - 1218	3.20	-21.00	-21.00	-43.93				-20.36	05/08/2006
ING Wells Fargo Small Cap Disciplined Portfolio - Serv Class - 1116	4.67	-14.54	-14.54	-35.24				-17.77	05/02/2006
Specialty - Health									
ING Evergreen Health Sciences Portfolio - Service Class - 776	0.09	-11.27	-11.27	-27.91	-10.57			-4.62	05/04/2005
Specialty - Natural Resources									
ING Global Resources Portfolio - Service Class - 2040	1.44	-12.65	-12.65	-46.82				-14.31	01/12/2007
Specialty - Real Estate									
ING Clarion Global Real Estate Portfolio - Inst Class - 1613	2.41	-26.07	-26.07					-49.14	09/05/2008
ING Clarion Real Estate Portfolio - Service Class - 1019	0.51	-34.31	-34.31	-61.46				-27.04	05/04/2006
Specialty - Technology									
ING BlackRock Science and Technology Opp Port - Class I - 050	3.90	-3.86	-3.86	-33.57	-12.87	-4.48		-12.85	05/01/2000
Specialty - Utilities									
ING MFS Utilities Portfolio - Service Class - 771	-2.00	-13.17	-13.17	-40.80	-5.39			-0.34	05/06/2005
Global / International									
Diversified Emerging Mkts									
ING JPMorgan Emerging Markets Equity Portfolio - Service Cla - 779	8.54	-6.17	-6.17	-48.75	-8.98			2.66	05/09/2005
Oppenheimer Developing Markets Fund - Class A - 190	8.25	-5.60	-5.60	-45.91	-10.31	7.42		9.46	02/21/2001
Pioneer Emerging Markets VCT Portfolio - Class I - 1331	9.70	-3.21	-3.21	-53.53				-30.58	05/07/2007
Foreign Large Blend									
EuroPacific Growth Fund® - Class R-4 - 573 (14)	1.84	-12.80	-12.80	-44.14	-12.15			-0.05	05/03/2004
Fidelity® VIP Overseas Portfolio - Initial Class - 107	0.22	-19.97	-19.97	-50.42	-17.23	-5.20	-2.10		05/31/1994
ING Artio Foreign Portfolio - Service Class - 830	0.55	-21.17	-21.17	-51.13	-16.61			-2.97	05/03/2004
ING Index Plus International Equity Port - Inst Class - 1049	2.13	-20.18	-20.18	-51.02				-44.86	11/09/2007
ING International Index Portfolio - Class I - 1551	2.19	-19.79	-19.79					-52.48	05/13/2008
Foreign Large Growth									
Artisan International Fund - Investor Shares - 1252	3.62	-14.68	-14.68					-52.69	05/12/2008
ING Marsico International Opportunities Port - Serv Class - 770	1.64	-12.97	-12.97	-51.43	-16.61			-6.10	05/06/2005
Foreign Large Value									
ING International Value Portfolio - Class I - 228	1.64	-18.32	-18.32	-48.68	-15.46	-4.12		-1.48	07/26/2001
ING Templeton Foreign Equity Portfolio - Initial Class - 1586	1.03	-18.86	-18.86					-50.20	04/25/2008
Foreign Small/Mid Growth									
Wanger International - 1348	0.90	-13.88	-13.88	-49.67				-32.09	05/09/2007
World Stock									
ING Oppenheimer Global-Int/Janus Aspen Worldwide Gr-Inst (8)	3.35	-13.76	-13.76	-43.09	-16.37	-6.24	-3.48		05/31/1995
ING Oppenheimer Global Portfolio - Initial Class - 432	3.35	-13.76	-13.76	-43.09	-16.37			-7.42	03/22/2005
ING Templeton Global Growth Portfolio - Service Class - 1232	2.67	-15.32	-15.32	-42.98				-17.71	05/03/2006
New Perspective Fund® - Class R-4 - 818 (15)	2.27	-12.09	-12.09	-41.49	-11.34			-1.77	05/03/2004
SMALLCAP World Fund® - Class R-4 - 1445	2.38	-11.02	-11.02					-52.28	05/15/2008

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Additional Notes

Not all investment options are available under all contracts, plans or jurisdictions.

(1) The CURRENT rate for the ING Fixed Plus Account Large Case is 3.00%, expressed as an annual effective yield, and is guaranteed not to drop below 3.00% through 12/31/2009. 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) An investment in a money market fund is not insured or guaranteed by the Federal Deposit Insurance Corporation or any other government agency. Although effective October 7, 2008, the fund seeks to preserve the value of your investment at $1.00 per share, there is no assurance it will be able to do so. While the fund's objective includes the preservation of capital, it is possible to lose money by investing in the fund.

(3) The performance shown is based on the performance of the replaced fund until July 27, 2007, and the performance of the applicable ING Portfolio after that date. The replaced fund may not have been available under all contracts.

(4) The ING Lord Abbett Affiliated Portfolio - Inst. Class commenced operations on May 1, 2003. The fund has identical investment objectives and policies, the same portfolio manager, and invests in the same holdings as the Service Class of this fund.The performance information for the ING Lord Abbett Affiliated Portfolio - Inst. Class prior to May 1, 2003 is based upon the Service Class performance, NOT adjusted by fees associated with the Inst. Class.

(5) The ING Marsico Growth Portfolio - Inst. Class commenced operations on May 1, 2003. The fund has identical investment objectives and policies, the same portfolio manager, and invests in the same holdings as the Service Class of this fund. The performance information for the ING Marsico Growth Portfolio - Inst. Class prior to May 1, 2003 is based upon the Service Class performance, NOT adjusted by fees associated with the Inst. Class.

(6) The ING Van Kampen Capital Growth Portfolio - Institututional Cl commenced operations on May 1, 2003. The fund has identical investment objectives and policies, the same portfolio manager, and invests in the same holdings as the Service Class of this fund. The performance information for the ING Van Kampen Capital Growth Portfolio - Institututional Cl prior to May 1, 2003 is based upon the Service Class performance, NOT adjusted by fees associated with the Inst. Class.

(7) The Bond Fund of AmericaSM - Class R-4 commenced operations on May 15, 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 Bond Fund of AmericaSM - Class R-4 prior to May 15, 2002 is based upon the Class A performance, adjusted by fees associated with Class R-4.

(8) The latter fund listed was replaced with the applicable ING Partners, Inc. Portfolio (the first fund listed). For most customers this occurred after the close of business on April 15, 2005. The performance shown is based on the performance of the replaced fund until April 15, 2005, and the performance of the applicable ING Partners, Inc. Portfolio after that date. The replaced fund may not have been available under all contracts. This replacement may have occurred for some customers on April 8, 2005.

(9) The Washington Mutual Investors FundSM - Class R-4 commenced operations on May 20, 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 Washington Mutual Investors FundSM - Class R-4 prior to May 20, 2002 is based upon the Class A performance, adjusted by fees associated with Class R-4.

(10) 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.

(11) The ING Baron Asset Portfolio - Service Class commenced operations on May, 3, 2006. The Service Class has identical investment objectives and policies, the same portfolio manager, and invests in the same holdings as Initial Class. The performance information above prior to May 3, 2006 is based upon the Initial Class performance adjusted by the fee differences between classes.

(12) The Loomis Sayles Small Cap Value - Retail Class commenced operations on December 31, 1996. Performance shown for periods prior to the inception date of the Retail Class represents the performance of the Institutional Class of shares during the periods shown, adjusted to reflect the current levels of management and 12b-1 fees payable by the respective Classes.

(13) The FTVIP Franklin Small Cap Value Securities Fund - Class 2 commenced operations on January 6, 1999. The fund has identical investment objectives and policies, the same portfolio manager, and invests in the same holdings as Class 1 of this fund. The performance information for the FTVIP Franklin Small Cap Value Securities Fund - Class 2 prior to January 6, 1999 is based upon the Class 1 performance, adjusted by fees associated with the Class 2.

(14) 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.

(15) 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.

Additional Notes

The CURRENT rate for the ING Short Term Guaranteed Accumulation Account is 3.00%, expressed as an annual effective yield, and is guaranteed between 05/30/2009 and 06/29/2012.

The CURRENT rate for the ING Long Term Guaranteed Accumulation Account is 3.00%, expressed as an annual effective yield, and is guaranteed between 04/01/2009 and 06/30/2014.

Deposits received from 04/01/2009 through 06/30/2009 will receive this rate of interest. The annual rate of interest applied to your account may be higher or lower than the current rate. For more information regarding the GAA rates and terms, call 1-800-GAA-FUND.

(16) The current yield reflects the deduction of all charges under the contract that are deducted from the total return quotations shown, except the maximum 5% deferred sales charge.

(17) The Investment Option is not part of the Separate Account. The returns listed do not include the impact of contract charges. Please refer to the contract to determine which Fixed Interest Options are available for your specific plan.

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

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.