

Edgar Filing: ING Separate Portfolios Trust - Form 40-17G

ING Separate Portfolios Trust
Form 40-17G
October 14, 2011

Gerard Mogan
Assistant Vice President

September 30, 2011

Mr. Matthew McDonald

Marsh USA Inc.

1255 23rd Street NW, Suite 400

Washington, CD 20037

Re: ING Family of Funds

Unified Board Funds

Investment Company Bond

Effective Date: October 1, 2011

Policy No. 314-79-82

Dear Matt:

We are pleased to provide our Binder Letter for the above captioned account. This Binder is conditioned on receiving the following information within 30 days of binding coverage:

No further subjectivities

| | | | |
|--------------------------|---|------------------------|-----------|
| Carrier: | Great American Insurance Company | | |
| AM Best's Rating: | A | S&P Rating: | A+ |
| Insured: | ING Family of Funds | | |
| Address: | 7337 E. Doubletree Ranch Rd., Suite 100 Scottsdale, AZ 85258 | | |
| Term: | October 1, 2011-2012 | | |
| Form: | Investment Company Policy | | |
| COVERAGE: | \$25,000,000 Single Loss Limit Each and Every Loss Basis | | |

| Insuring Agreement | Single Loss Limit | Deductible |
|--|--------------------------|-------------------|
| Basic Agreements (A) Fidelity, incl. Trading | \$25,000,000 | NIL |
| (B) On Premises, | | |
| (C) Transit, & (F) Counterfeit Currency | \$25,000,000 | \$25,000 |
| (D) Forgery of Alteration | \$25,000,000 | \$25,000 |
| (E) Securities | \$25,000,000 | \$25,000 |
| Computer Systems | \$25,000,000 | \$25,000 |
| Voice Initiated Transfer Fraud | \$25,000,000 | \$25,000 |
| Telefacsimile Transfer Fraud | \$25,000,000 | \$25,000 |
| Audit Expense | \$250,000 | \$5,000 |
| Unauthorized Signatures | \$250,000 | \$5,000 |
| Uncollectible Items of Deposit | \$250,000 | \$5,000 |
| Stop Payment Legal Liability | \$250,000 | \$5,000 |
| Annual Premium - \$60,919 | | |

Additional Coverages:

Listing of Insureds

90-Day Cancellation, except for non-payment of premium.

Automatic Coverage for Newly created Funds

Claim Reporting Threshold of 50% of Deductible

Computer Systems Fraud rider All systems utilized by the Named Insureds

Voice Initiated Transfer Fraud contained in the Computer Systems Fraud Rider Par. 4

Telefacsimile Transfer Fraud in Form

Extended Computer Coverages

Worldwide Counterfeit Currency

Amend the Definition of Employee to include ex-employees up to 60 days after termination, except if for reasons of Fraud or Dishonesty

Notice of Cancellation sent to - State of Arkansas, SEC, Midwest Stock Exchange

Amended Discovery replace by the Insured to by Risk Management Department, Office of the

General Counsel, or Senior Vice President or above of the Insured

Amended Fidelity Language to provide or wording, except for Loans or Trading.

Amended Fidelity Language to provide Malicious Destruction of Data

Commission Payable: 16.5%

Matt, please review and call me should you have any questions. Thank you for the order!

Sincerely,

Gerard Mogan

Edgar Filing: ING Separate Portfolios Trust - Form 40-17G

Assistant Vice President

Great American Insurance Company

40 Rector Street, 15th Floor

New York, NY 10006

Phone: 212-513-4013

FAX: 212-513-4015

Efax: 513-768-5187