



Response to Request for Information

Reference FOI 0116117
Date 19 January 2016

Private Equity Manager

Request:

Pursuant to the Freedom of Information Act 2000, please provide me with a copy of any records containing disclosures by any private equity manager with whom you do business, made to you since January 1, 2015, regarding any interaction that the manager or its affiliates has had with the SEC, the IRS, any U.S. state or local tax authorities, or any U.K. tax or securities regulatory body. Interactions with the SEC or U.K. securities regulatory body would include but not be limited to examinations, findings, inquiries, information requests, deficiency notices, and enforcement notices. Interactions with the IRS or other tax authorities would include audits and tax deficiency notices.

In addition, please provide me with a copy of any records containing disclosures by any private equity manager with whom you do business, made to you since January 1, 2015 for the purpose of clarifying, disclosing, or explaining fee or expense reimbursement practices of the manager.

Please provide me the requested documents via email at this address.

In response to your request, West Midlands Pension Fund only holds information for any private equity managers that have directly notified us of any interaction with regulatory authorities like the Securities and Exchange Commission, Financial Conduct Authority or Internal Revenue Service. Therefore, West Midlands Pension Fund holds one report in relation to Blackstone Capital Partners V, where a review was conducted by the Securities and Exchange Commission. Copies of the public documents are available on the SEC's website.

In respect of the information to provide copies of reports containing disclosures and reimbursements directly relating to West Midlands Pension Fund's investment relationship with Blackstone Capital Partners (or any other) has been withheld. The Council considers that the information you have requested, which we have identified above, is exempt from disclosure under Section 43 of the Freedom of Information Act.

We should explain that Section 43 of the Freedom of Information Act 2000 permits the Council to withhold information if its disclosure would, or would be likely to, prejudice the commercial interest of any person, including the Public Authority holding it. The Council considers that to disclose the information you have requested, at this stage, would prejudice the commercial interests of the parties

[NOT PROTECTIVELY MARKED]

mentioned above and this information is therefore exempt from disclosure under section 43 of the Act.

Both the Financial Conduct Authority and the Securities and Exchange have online registers where you can search for companies and any associated exemptions or notices.