

Central States, Southeast and Southwest Areas Pension Plan  
Item #15

Does the application include a description of the efforts that are being taken to contact participants, beneficiaries in pay status, and alternate payees.  
See section 4.05(2).

A description of the efforts being taken to contact participants, beneficiaries in pay status, and alternate payees is attached as document number 15.1. A due diligence letter from Small World Solutions LLC dated February 19, 2015 is attached as document number 15.2. A due diligence letter from Small World Solutions LLC dated July 27, 2015 is attached as document number 15.3.

**Section 4.05(2). Does the application include a description of the efforts that are being taken to contact participants, beneficiaries in pay status, and alternate payees.**

Central States has taken numerous steps to contact participants, beneficiaries in pay status, and alternate payees. In February 2015, Central States hired Small World Solutions, LLC (SWS) to locate current addresses for individuals that had invalid addresses on file with Central States. Central States provided SWS with information concerning those 32,015 individuals. On February 19, 2015, SWS was able to provide an address for 25,366 of those individuals. A due diligence letter from SWS regarding the February 19, 2015 search is attached. Central States updated its addresses based upon the information provided by SWS.

In April 2015, Central States sent a letter to all participants, beneficiaries in pay status, and alternate payees via United States Postal Service First Class presorted which includes forwarding and address correction services. The letter advised those individuals that the Board of Trustees was considering whether to file an application to suspend benefits. Central States set up a special MPRA website ([www.cspensionrescue.com](http://www.cspensionrescue.com)) to provide participants, beneficiaries in pay status, and alternate payees with information and updates concerning the MPRA process, and Central States encouraged those individuals to sign up for updates via email by registering on the website. Central States has updated that website throughout the process and those individuals that provided an email address received emails alerting them when new information was available.

After the April 2015 mailing, the United States Postal Service provided address updates and returned mail from those mailings to Central States. Central States updated its records for new addresses and compiled a list of invalid addresses from the returned mail. Central States provided SWS with information concerning 15,465 individuals that had invalid addresses. On July 27, 2015, SWS was able to provide an address for 6,945 of those individuals. A due diligence letter from SWS regarding the July 27, 2015 search is attached. Central States again updated its addresses based upon the information provided by SWS. In addition, with respect to active participants that had invalid addresses, Central States' staff contacted the active participant's current employer to obtain addresses. With respect to terminated participants, Central States' staff contacted the terminated participant's local union to obtain addresses.

The current mailing list for the notice of this application has been updated with respect to both searches performed by SWS and has also taken into account any address information provided by individuals on the MPRA website. The notice of this application will be mailed via United States Postal Service First Class Mail which includes forwarding and address correction services to a total of 410,209 participants, beneficiaries in pay status, and alternate payees. Of this total, 10,658 of the addresses cannot be verified. This represents only 2.6% of the total. Any updated addresses obtained from the United States Postal Service after the mailing will be used to update Central States' records. To the extent that any of the addresses are undeliverable, Central States intends to request that SWS conduct an additional search for those addresses.

## Due Diligence Letter for Locating Missing Participants

The Department of Labor (DOL) provides updated guidance for locating missing participants. While Field Assistance Bulletin 2014-01 (FAB 2014-01) was specifically directed at the issues encountered when attempting to terminate defined contribution plans and distribute all plan assets in a timely manner, much of the guidance may also be applied to non-plan termination situations. In addition, it may be applied to defined benefit plans, 403(b) plans, and governmental 457(b) plans where missing participant accounts and benefits are an issue. The DOL notes that actions taken to locate missing participants are considered a fiduciary responsibility under ERISA.

“Missing participants” include participants and beneficiaries who are either unresponsive to requests sent by the plan or whose mail is returned to the sponsor as undeliverable.

In the context of FAB 2014-01, this notification would be of a pending plan termination. However, administrators of ongoing plans may need to notify participants or beneficiaries of pending required distributions (for example, due to attainment of normal retirement age, required beginning date, or death benefit distributions), and these methods of notification would be standard for those situations as well.

The DOL lists the following search steps, which may involve fees for use: • Internet search tools; • Commercial locator services; • Credit reporting agencies; • Information brokers; and • Investigation databases.

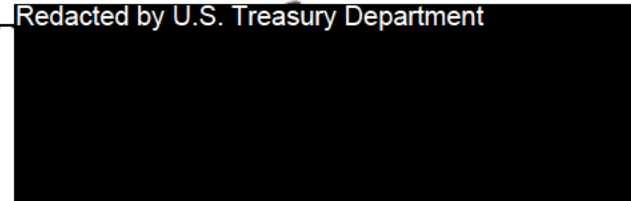
Small World Solutions, LLC is an Information Broker offering a Commercial Locator Service whose data sources include Credit Reporting Agencies and over 3,000 Informational databases, which can be accessed via the internet.

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On 02/19/2015, we performed a due diligent search for Central States Pension Fund. The results of the missing participant search are as follows:

Total number of records submitted: 32,015  
Total number of Addresses Verified: 25,366

Small World Solutions, LLC  
Redacted by U.S. Treasury Department



Dated: 09/11/2015

**[Confidential]**

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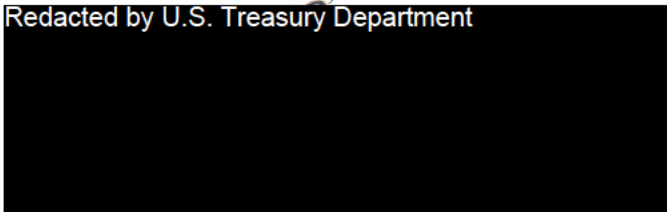
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On 07/27/2015, we performed a due diligent search for Central States Pension Fund. The results of the missing participant search are as follows:

Total number of records submitted: 15,465

Total number of Addresses Verified: 6,945

Small World Solutions, LLC  
Redacted by U.S. Treasury Department



Dated: 09/11/2015

**[Confidential]**