

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



**FILED**

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A. 23-09-007  
(Filed September 14, 2023) A2309007

Application of MIP VI Trainer, L.P. and  
Pavlov Media, Inc. for Authority Permitting  
MIP VI Trainer, L.P. to Acquire Indirect  
Control of Campus Communications Group,  
Inc. (U-7352-C)

**RESPONSE OF MIP VI TRAINER, L.P. TO REQUEST OF  
ADMINISTRATIVE LAW JUDGE FOR ADDITIONAL INFORMATION**

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Date: December 5, 2023

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Pursuant to the December 4, 2023 request of Administrative Law Judge Seaneen McCarthy Wilson at the Prehearing Conference (“PHC”) in the above-captioned matter, of MIP VI Trainer, L.P. (“MIP”) provides the following information.

During a confidential sidebar at the PHC, Judge Wilson inquired with regard to a tax lien (appearing on a public search site) that had been filed by the United States Internal Revenue Service (“IRS”) on June 20, 2016 with respect to Macquarie Bank Limited, a company affiliated with MIP.

MIP has conducted a search of records to respond to Judge Wilson’s inquiry. That search indicates that on July 29, 2016, the IRS filed a Certificate of Release of Federal Tax Lien indicating that Macquarie Bank Limited had satisfied the taxes underlying the lien. The issuance of the Certificate of Release of Federal Tax Lien predates MIP’s Verification (Exhibit H to the Application) executed by Anton Moldan on September 23, 2023. Therefore, no modification of, or exception to, Mr. Moldan’s Verification is required.

Moreover, the tax lien released on July 19, 2016, had been imposed on an entity completely outside the management chain affecting MIP. As shown in Exhibit G to the Application, MIP is owned by a fund that is controlled and managed, through intermediate entities, by Macquarie Infrastructure and Real Assets Inc. (MIRA), which

manages investments in infrastructure assets.<sup>1</sup> MIRA is an indirectly wholly owned subsidiary of Macquarie Group Limited (MGL), a publicly traded company incorporated in Australia. Macquarie Bank Limited is also indirectly wholly owned by MGL, but it lies wholly outside of the ownership structure of MIP.

Respectfully submitted December 5, 2023 at San Francisco, California.

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<sup>1</sup> See footnote 3 in Decision 21-08-029 (August 19, 2021).