



REVIEW REPORT 158-2016

Global Transportation Hub Authority

September 23, 2016

Summary: The Global Transportation Hub Authority (GTH) identified 240 e-mails with attachments that were responsive to the Applicant's access to information request. The GTH withheld the entire record pursuant to subsections 17(1)(a), 18(1)(b), (d), (f), 19(1)(a), (b), (c)(i), (c)(ii) and 29(1) of *The Freedom of Information and Protection of Privacy Act* (FOIP). The Commissioner reviewed the record and recommended release of some of the e-mails and attachments.

I BACKGROUND

- [1] On April 6, 2016, the Global Transportation Hub Authority (GTH) received an access to information request for "all correspondence between the GTH and/or any of its representatives and [a Third Party] and/or any of its representatives between January 1, 2013 and April 5, 2016."
- [2] On June 15, 2016, the GTH replied to the Applicant. It indicated that all responsive records were being withheld pursuant to subsections 17(1)(a), 18(1)(b), (d), (f), 19(1)(a), (b), (c)(i) and (c)(ii) of *The Freedom of Information and Protection of Privacy Act* (FOIP).
- [3] On June 20, 2016, the Applicant requested a review of the application of the exemptions by my office. On June 22, 2016, my office provided notification to the Applicant and the GTH of our intention to undertake a review.

II RECORDS AT ISSUE

- [4] The GTH has identified 240 e-mails and attachments that qualify as responsive records. During the course of the review, GTH released 72 of these documents. A total of 168 remain.
- [5] The GTH first provided a sample of 20 e-mails with attachments – a total of 34 documents (GTH released eight of these documents). See Appendix A for more details. The GTH applied subsections 17(1)(a), 18(1)(b), (d), (f), 19(1)(a), (b), (c)(i) and (c)(ii) of FOIP to various portions of these 34 documents. The GTH has also applied subsection 29(1) of FOIP to various portions of the record. The analysis in this report focuses on the 34 sample documents originally supplied by the GTH.
- [6] My office often allows a public body to provide a representative sample if the record is large and uniform. However, in this case, it was determined that e-mails and attachments are so varied that all records would need to be reviewed.
- [7] In addition to the sample records, there are 156 remaining e-mails and several attachments. See Appendix B for details. It is standard and best practice for a public body to indicate the exemptions that it is claiming for each record, page or portion of record. Sometimes an exemption is claimed on a particular line of text or sentence. GTH did not specifically indicate which exemptions applied to these remaining documents. I have reviewed them and made a determination on the face of the record and based on its submission as to what exemptions apply. With this process, a public body runs the risk of a greater number of records being recommended for release.
- [8] Upon review of all of the records, I make the following observations before proceeding with my detailed analysis:
- The 20 e-mails with attachments was a reasonable representative sample of records with the exception that the GTH did not include the executed Purchase Agreement and Cooperation Agreement signed in February 2016. These are key records but the GTH opted not to make it part of their sample. As a result, the GTH did not indicate which exemptions specifically apply to these records. (See Appendix B.)

- Some of the records identified appear to be non-responsive to the Applicant's request. As per my office's blog entitled *Non-responsive Information in a Responsive Record*, GTH should decide to release the records where I have recommended to do so.
- My office has several resources on the website which describes the proper methods of preparing a record for review and the importance of following these methods. This includes *What to Expect During a Review With the IPC* and a blog entitled *Tips for a Good Submission*. I encourage the GTH to review these resources.

III DISCUSSION OF THE ISSUES

1. Did GTH properly apply subsection 29(1) of FOIP to the record?

[9] Subsection 29(1) of FOIP provides:

29(1) No government institution shall disclose personal information in its possession or under its control without the consent, given in the prescribed manner, of the individual to whom the information relates except in accordance with this section or section 30.

[10] In order for subsection 29(1) to apply, the information severed in the record must first be found to qualify as "personal information" pursuant to subsection 24(1) of FOIP. This section states:

24(1) Subject to subsections (1.1) and (2), "**personal information**" means personal information about an identifiable individual that is recorded in any form, and includes...

[11] The GTH has applied subsection 29(1) of FOIP to names and business contact information of various individuals involved in the correspondence. It did not address the application of this subsection in its submission.

[12] In the past, I have defined work product as information generated by or otherwise associated with an individual in the normal course of performing his or her professional or employment responsibilities, whether in a public or private setting. Work product is

not considered personal information. Further, my office has found that business card information is not personal in nature and would not qualify as personal information.

[13] The information severed by the GTH under subsection 29(1) of FOIP would qualify as either work product or business card information, but not personal information. Therefore, subsection 29(1) of FOIP does not apply to the sample record.

[14] On review of the remaining records, I did find three instances of personal information on records where I recommend release. This includes information about family status and a personal telephone number. This information qualifies as personal information pursuant to subsection 24(1)(a) and (e) of FOIP. I recommend that the GTH sever this information before releasing the rest of the information to the Applicant. See Appendix B for details.

2. Does subsection 17(1)(a) of FOIP apply to the record?

[15] Subsection 17(1)(a) of FOIP states:

17(1) Subject to subsection (2), a head may refuse to give access to a record that could reasonably be expected to disclose:

(a) advice, proposals, recommendations, analyses or policy options developed by or for a government institution or a member of the Executive Council;

[16] My office has considered this exemption many times in the past. The exemption is meant to allow for candor during the policy-making process, rather than providing for the non-disclosure of all forms of advice. The established test that my office uses to determine the applicability of this exemption is as follows:

1. Does the information qualify as advice, proposals, recommendations, analyses or policy options?

2. The advice, recommendations, proposals, analyses and/or policy options must:

a. be either sought, expected, or be part of the responsibility of the person who prepared the record; and

- b. be prepared for the purpose of doing something, for example, taking an action or making a decision; and
- c. involve or be intended for someone who can take or implement the action.

3. Was the advice, recommendations, analyses and/or policy options developed by or for a government institution or a member of the Executive Council?

[17] Advice includes the analysis of a situation or issue that may require action and the presentation of options for future action, but not the presentation of facts. Advice has a broader meaning than recommendations. Recommendations relate to a suggested course of action as well as the rationale for a suggested course of action. Recommendations are generally more explicit and pointed than advice. Proposals, analyses and policy options are closely related to advice and recommendations and refer to the concise setting out of the advantages and disadvantages of particular courses of action.

[18] In the GTH's sample of 34 records it specifically indicated that subsection 17(1)(a) of FOIP applied to seven of the documents. Upon review, only three of the records would constitute advice, proposals, recommendations, analyses or policy options. The other four can be categorized as factual statements, a finalized agreement, a request for feedback or public information sent for informational purposes.

[19] With respect to the three documents that qualify as advice, proposals, recommendations, analyses or policy options, I am satisfied that the other two parts of the test have been met and subsection 17(1)(a) of FOIP.

[20] Appendix B indicates where I have found subsection 17(1)(a) of FOIP applies to the remaining 220 records.

3. Does subsection 18(1)(b) of FOIP apply to the record?

[21] Subsection 18(1)(b) of FOIP states:

18(1) A head may refuse to give access to a record that could reasonably be expected to disclose:

...

(b) financial, commercial, scientific, technical or other information:

(i) in which the Government of Saskatchewan or a government institution has a proprietary interest or a right of use; and

(ii) that has monetary value or is reasonably likely to have monetary value;

[22] My office has established the following test for this exemption:

1. Does the information contain financial, commercial, scientific, technical or other information?
2. Does the public body have a proprietary interest or a right to use the information?
3. Does the information have monetary value or is it likely to?

[23] The GTH applied subsection 18(1)(b) of FOIP to six of the 34 sample records. However, there is no need to review two documents as another exemption applies. Four remain.

1. Does the information contain financial, commercial, scientific, technical or other information?

[24] The GTH's submission indicates that the information in the four documents qualify as commercial information. Commercial information means information relating to the buying, selling or exchange of merchandise or services. This includes third party associations, past history, references and insurance policies and pricing structures, market research, business plans, and customer records.

[25] I agree that three of the four records qualify as commercial information and meet this part of the test. However, this exemption also acknowledges that other types of information could qualify for this exemption if it meets the next two parts of the test.

2. Does the public body have a proprietary interest or a right to use the information?

[26] This means that the public body must be able to demonstrate rights to the information. Proprietary interest is the interest held by a property owner together with all appurtenant rights, such as a stockholder's right to vote the shares.

[27] The three records that qualify as commercial information describe the services and benefits offered when engaging in business opportunities with the GTH. As such, the GTH has a proprietary right to the information. Record 4a describes a trip of a Saskatchewan delegation to China arranged by a Third Party that occurred in the past. I am not persuaded that there is a proprietary right to this information. Subsection 18(1)(b) of FOIP does not apply to record 4a.

3. Does the information have monetary value or is it likely to?

[28] Monetary value may be demonstrated by evidence of potential for financial return to the public body. The GTH's submission advises that the information in question "relates to the GTH's ability to compete in the marketplace." Upon review, I agree that the information is likely to have monetary value. Subsection 18(1)(b) of FOIP applies to three documents as described in Appendix A.

[29] Appendix B indicates where I have found subsection 18(1)(b) of FOIP applies to the remaining 220 records.

4. Does subsection 19(1)(b) of FOIP apply to the record?

[30] Subsection 19(1)(b) of FOIP states:

19(1) Subject to Part V and this section, a head shall refuse to give access to a record that contains:

...

(b) financial, commercial, scientific, technical or labour relations information that is supplied in confidence, implicitly or explicitly, to a government institution by a third party;

[31] My office has established a three part test for subsection 19(1)(b) of FOIP as follows:

1. Is the information financial, commercial, scientific, technical or labour relations information?
2. Was the information supplied by the third party to a public body?

3. Was the information supplied in confidence implicitly or explicitly?

- [32] The GTH applied subsection 19(1)(b) of FOIP to 21 of the 34 sample records. However, other exemptions apply to seven of these records. Therefore, there is no need to review the application of this exemption to them.
- [33] The GTH's submission asserts that the information to which subsection 19(1)(b) of FOIP has been applied qualifies as commercial information as defined above. Upon review, I have found that the information on only four of the remaining 14 records would qualify as commercial information. This information includes business plans and third party associations. The first part of the test is met for these four records.
- [34] I would describe the other 10 records as details of a trip to China, an invitation from another government, public information about an association and e-mails that reveal a meeting took place. These do not qualify as commercial information and the first part of the test is not met. Subsection 19(1)(b) of FOIP does not apply.
- [35] The second part of the test has been met for the four records that qualify as commercial information. Upon review of the record, it is apparent that the information was supplied by a Third Party to the GTH.
- [36] However, the GTH must also demonstrate that the records were provided explicitly or implicitly in confidence. To demonstrate that the information was supplied explicitly in confidence, the GTH provided us with an e-mail from the Third Party objecting to release of any documents and two agreements between themselves and the Third Party.
- [37] After the GTH received the access request from the Applicant, it consulted with the Third Party about release of records. The Third Party replied in an e-mail dated May 16, 2016 and objected to release of any of the responsive records. However, for subsection 19(1)(b) of FOIP to apply, a public body must show that both parties intended the information be held in confidence at the time the information was supplied. The e-mail cannot serve this function retroactively.

[38] The first agreement is a confidentiality agreement signed in 2013. Upon review of the agreement, it would no longer qualify as it states: “This Agreement shall automatically expire when the parties enter into a form agreement in relation to the Lands.” An agreement in relation to the Lands was signed in February 2016, which means the confidentiality agreement is expired.

[39] The GTH relied upon to demonstrate the agreement in relation to the Lands signed in February 2016 to demonstrate that the information was supplied explicitly in confidence. However, clause 13.11 of the agreement states: “In addition, without limitation, GTHA or the Purchaser may disclose... any Confidential Information as may be required pursuant to *The Freedom of Information and Protection of Privacy Act* (Saskatchewan)...”

[40] I am not persuaded that the information was supplied in confidence. Subsection 19(1)(b) of FOIP does not apply to the record.

5. Does subsection 18(1)(f) of FOIP apply to the record?

[41] Subsection 18(1)(f) of FOIP states:

18(1) A head may refuse to give access to a record that could reasonably be expected to disclose:

...

(f) information, the disclosure of which could reasonably be expected to prejudice the economic interest of the Government of Saskatchewan or a government institution;

[42] In order to qualify, the public body must show how the information is expected to prejudice economic interests. The public body does not have to prove that the prejudice is probable, but needs to show that there is a “reasonable expectation of prejudice” if any of the information/records were to be released.

[43] Prejudice in this context refers to detriment to economic interests. Economic interest refers to both the broad interests of a public body and for the government as a whole, in managing the production, distribution and consumption of goods and services. The term

also covers financial matters such as the management of assets and liabilities by a public body and the public body's ability to protect its own or the government's interests in financial transactions.

[44] The GTH has applied subsection 18(1)(f) of FOIP to 26 of the 34 sample records. However, other exemptions apply to ten of the records; therefore, I must only review the application of subsection 18(1)(f) of FOIP to 16 of the records.

[45] Given the diversity of the information in the records, the GTH's submission outlined several ways that release of this information could prejudice the economic interests of the Government of Saskatchewan or GTH. They are summarized as follows:

- Release of the information could provide potential clients with knowledge of what the GTH has done to attract other clients. This would reduce the future bargaining power of the GTH.
- Present and future clients will lose confidence in the GTH because it is subject to freedom of information laws and information may be released to the public. This may result in a loss of communication, and ultimately its ability to do business.
- Release of the information could enable the GTH's competitors to gain an advantage because it would have insight into the negotiation tactics and offerings of the GTH. This would affect the GTH's competitiveness in the marketplace.
- Release of information may erode the Third Party's competitive position and not complete business transactions with the GTH.

[46] For this provision to apply there must be objective grounds for believing that disclosing the information would result in prejudice. The public body does not have to prove that prejudice is probable, but needs to show that there is a "reasonable expectation" of prejudice if any of the information were to be released. The following criteria are used:

1. There must be a clear cause and effect relationship between the disclosure and the prejudice which is alleged;
2. The prejudice caused by the disclosure must be more than trivial or inconsequential; and
3. The likelihood of prejudice must be genuine and conceivable.

1. Is there a clear cause and effect relationship between the disclosure and the prejudice which is alleged?

[47] I am not persuaded there is a clear cause and effect relationship between the release of records and the first and second examples of prejudice given by the GTH. For the first example, different businesses will have different needs. Further, I expect that the GTH will do whatever is necessary to pursue lucrative opportunities. With respect to the GTH's second example of prejudice, it is a legislative reality that the GTH is subject to access to information laws. I have confidence that the exemptions in FOIP strike a balance between the need for confidentiality of business transactions and the obligation of the GTH to be open and accountable to the public.

[48] I do agree that there is a clear cause and effect relationship between the disclosure of certain records and the third and fourth examples of prejudice which is alleged.

2. Is the prejudice caused by the disclosure more than trivial or inconsequential?

[49] For GTH's third and fourth examples of prejudice, I agree that it is more than trivial or inconsequential.

3. Is the likelihood of prejudice genuine and conceivable?

[50] Upon review of the record, I find that it is conceivable that release of 11 of the records could erode the competitive position of the Third Party and in turn compromise the economic interests of the GTH. I find subsection 18(1)(f) of FOIP applies to these records.

[51] However, there are other records to which the GTH has applied subsection 18(1)(f) of FOIP where I am not persuaded that the likelihood of prejudice is genuine and conceivable. This includes e-mails that simply convey attachments, general information about the GTH and the itinerary of a trip to China. Subsection 18(1)(f) does not apply to these records.

[52] Appendix B indicates where I have found subsection 18(1)(f) of FOIP applies to the remaining 220 records.

6. Does subsection 18(1)(d) of FOIP apply to the record?

[53] Subsection 18(1)(d) of FOIP states:

18(1) A head may refuse to give access to a record that could reasonably be expected to disclose:

...

(d) information, the disclosure of which could reasonably be expected to interfere with contractual or other negotiations of the Government of Saskatchewan or a government institution;

[54] The GTH has applied subsection 18(1)(d) of FOIP to 26 of the 34 sample documents. I have found that other exemptions apply to 21 of these records; therefore, five remain.

[55] The following test must be met in order for subsection 18(1)(d) of FOIP to be found to apply:

1. Identify and provide details about the contractual or other negotiations and the parties involved; and
2. Detail how release of the record could reasonably be expected to interfere with the contractual or other negotiations.

[56] In its submission, the GTH indicated that the “release of these records could reasonably be expected to have an impact on the GTH’s current and future client negotiations.” My office has stated that perspective or future negotiations could be included within this exemption, as long as they are foreseeable. The GTH did not provide further specific details about these negotiations.

[57] The GTH’s submission indicates that the release of certain records would interfere in negotiations in the same ways as listed under subsection 18(1)(f) of FOIP.

[58] Upon review of these five records, and without specific details of negotiations, I am not persuaded that release would interfere with negotiations. E-mails transmitting

information, letters explaining the GTH's general appeal, an itinerary of a trip to China, a thank you letter from the Ministry of Economy and an e-mail conveying public information.

[59] Subsection 18(1)(d) of FOIP does not apply to the record.

IV FINDINGS

[60] I find that subsections 17(1)(a), 18(1)(b), (f) and 29(1) apply to some records as described in Appendices A and B.

[61] I find that subsections 18(1)(d) and 19(1)(b) do not apply to the record.

V RECOMMENDATION

[62] I recommend that the GTH release the records identified in Appendices A and B to the Applicant.

Dated at Regina, in the Province of Saskatchewan, this 23rd day of September, 2016.

Ronald J. Kruzeniski, Q.C.
Saskatchewan Information and Privacy
Commissioner

Appendix A – Sample of Records

Subsection 29(1) of FOIP does not apply to these records. All information withheld under subsection 29(1) of FOIP should be released to the Applicant.

R = Release

W = Withhold

NNTR = No need to review

Record	Page(s)	17(1)(a)	18(1)(b)	18(1)(d)	18(1)(f)	19(1)(a)	19(1)(b)	19(1)(c)	R or W
Email 1	2	No		No	No		No		R
Attachment A	3			No	No		No		R
Email 2	4		No	NNTR	Yes				W
Attachment A	5-8	No	Yes	NNTR	NNTR		NNTR	NNTR	W
Email 3	9		NNTR	NNTR	Yes				W
Attachment A	10-14		Yes	NNTR	NNTR				W
Attachment 4A	16-24		No	No	No		No		R
Attachment 6A	28-30			NNTR	Yes	NNTR	NNTR		W
Email 7	31			NNTR	Yes		NNTR		W
Email 8	32	No		NNTR	Yes				W
Attachment A	33-34		Yes	NNTR	NNTR				W
Email 9	35			NNTR	Yes		NNTR		W
Email 10	36-38			NNTR	Yes		No	NNTR	W
Attachment 11A	40			No	No				R
Attachment 12A	42-53			NNTR	Yes	NNTR	No	NNTR	W
Attachment 12B	54-65			NNTR	Yes	NNTR	No	NNTR	W
Attachment 12C	66-67			NNTR	Yes		No		W
Attachment 13A	69-70						No		R
Email 14	71			NNTR	Yes				W
Attachment A	72			NNTR	Yes				W
Email 15	73	Yes		NNTR	NNTR				W
Attachment A	74			NNTR	Yes				W
Email 16	75-77			NNTR	Yes		NNTR		W
Email 17	78-80			NNTR	Yes		NNTR		W
Email 18	81-82	Yes		NNTR	NNTR		NNTR		W
Email 20	84	Yes		NNTR	NNTR				W

Appendix B – Remaining Records

R = Release

W = Withhold

File #	File Type	# of Pages	Exemption(s)	R or W
1a	Powerpoint	2	18(1)(b)	W
2a	Word	4	18(1)(b)	W
3a	Word	4	18(1)(b)	W
4a	Word	1	18(1)(b)	W
5	Email	1	18(1)(f)	W
5a	Powerpoint	5	18(1)(f)	W
6	PDF	1	18(1)(f)	W
7	Email	1	18(1)(b)	W
8	Email	1	18(1)(f)	W
8a	Word	2	18(1)(f)	W
9	Email	1	18(1)(f)	W
9a	Word	2	18(1)(f)	W
10	PDF	1	18(1)(f)	W
10a	Word	1	18(1)(f)	W
12	Email	3		R
14	Email	1	17(1)(a)	W
16a	PDF	22		R
16b	PDF	4		R
17a	PDF	2		R
18	Email	2		R
19	Email	1		R
20	Email	1	18(1)(f)	W
20a	PDF	19	18(1)(f)	W
21	Email	1		R
21a	JPG	1		R
21b	JPG	1		R
22	Email	1		R
22a	JPG	1		R
23	Email	1	18(1)(f)	W
24	Email	1	18(1)(f)	W
25	Email	1	18(1)(f)	W
26	PDF	1	18(1)(f)	W
27	Email	2	18(1)(b)	W
27a	PNG	1	18(1)(b)	W
27b	Word	3	18(1)(b)	W
30	PDF	1	18(1)(f)	W

File #	File Type	# of Pages	Exemption(s)	R or W
31	PDF	2	18(1)(f)	W
32	PDF	1	18(1)(f)	W
33	PDF	1	18(1)(f)	W
34	PDF	2	18(1)(f)	W
35	Email	1		R
36	Email	1	17(1)(a)	W
37	Email	1		R
38	Email	2		R
40	Email	1	18(1)(f)	W
40a	PDF	3	18(1)(f)	W
43	Email	1		R
44	PDF	2	18(1)(f)	W
45	PDF	4	17(1)(a)	W
46	PDF	2	18(1)(f)	W
48a	Word	1		R
49	PDF	3	17(1)(a)	W
50	PDF	1		R
54	Email	2	18(1)(f)	W
54a	PDF	1	18(1)(f)	W
54b	PDF	1	18(1)(f)	W
55	Email	1		R
55a	PDF	3		R
56a	JPG	1		R
56b	JPG	1		R
57a	JPG	1		R
57b	JPG	1		R
58a	JPG	1		R
58b	JPG	1		R
59a	Word	3		R
61	Email	1		R
61a	JPG	1		R
62	PDF	1	18(1)(f)	W
63	PDF	2	18(1)(f)	W
64	PDF	3	18(1)(f)	W
65	PDF	4	18(1)(f)	W
66	PDF	3	18(1)(f)	W
68	Email	1	18(1)(b)	W
70	Email	1		R
70a	Word	1		R
71a	Word	1		R

File #	File Type	# of Pages	Exemption(s)	R or W
72	Email	1		R
73	PDF	2		R
74	Email	1		R
74a	JPG	1		R
75	Email	1	18(1)(f)	W
75a	JPG	1	18(1)(f)	W
75b	JPG	1	18(1)(f)	W
75c	JPG	1	18(1)(f)	W
76	Email	1	18(1)(b)	W
76a	PDF	1	18(1)(b)	W
77	PDF	2	18(1)(f)	W
78	Email	1		R
79	Email	1	18(1)(f)	W
81	Email	1	18(1)(f)	W
82	Email	1	18(1)(f)	W
83a	Word	3		R
84	Email	1	18(1)(f)	W
84a	Word	1	18(1)(f)	W
86	Email	1	18(1)(f)	W
88a	JPG	1		R
88b	JPG	1		R
89a	JPG	1		R
89b	JPG	1		R
90	PDF	1	18(1)(f)	W
91	Email	1	18(1)(f)	W
91a	Word	2	18(1)(f)	W
91b	Word	1	18(1)(f)	W
92	Email	1		R
93	Email	2		R
94	Email	2		R
96	Email	3	18(1)(b)	W
97	Email	3	18(1)(b)	W
99	Email	3	18(1)(b)	W
100	Email	1	18(1)(f)	W
101	Email	1	18(1)(f)	W
102	Email	1		R
103	Email	1		R
104	Email	2	17(1)(a)	W
105	Email	1		R
106	Email	2		R

File #	File Type	# of Pages	Exemption(s)	R or W
107	Email	2	17(1)(a)	W
108	Email	1	17(1)(a)	W
109	Email	1		R
110	Email	4	17(1)(a)	W
111	Email	1	18(1)(f)	W
112	Email	2	18(1)(f)	W
113	Email	2	18(1)(f)	W
114	Email	2	18(1)(f)	W
115	Email	2	18(1)(f)	W
116	Email	3	18(1)(f)	W
117	Email	2	18(1)(b)	W
118	Email	1	18(1)(f)	W
119	Email	1	18(1)(f)	W
120	Email	1	18(1)(f)	W
121	Email	1	18(1)(f)	W
122	Email	1	18(1)(f)	W
123	Email	1	18(1)(f)	W
124	Email	1	18(1)(f)	W
125	Email	2		R
131a	Word	3		R
134	Email	1	18(1)(b)	W
135	Email	1		R
136	Email	1	17(1)(a)	W
137	Email	1	17(1)(a)	W
145	Email	1	18(1)(f)	W
145a	Word	4	18(1)(f)	W
145b	Word	3	18(1)(f)	W
146	Email	1	18(1)(f)	W
147	Email	4	18(1)(f)	W
148	Email	5	18(1)(f)	W
149	Email	5	18(1)(f)	W
150	Email	2	18(1)(b)	W
150a	Word	1	18(1)(b)	W
151	Email	2	18(1)(b)	W
153	Email	1	18(1)(f)	W
154	Email	2	18(1)(f)	W
154a	PDF	2		R
155	Email	2	18(1)(f), 18(1)(b)	W
156	Email	2	18(1)(f), 18(1)(b)	W
156a	PDF	2	18(1)(f), 18(1)(b)	W

File #	File Type	# of Pages	Exemption(s)	R or W
157	Email	1	18(1)(b)	W
159a	PDF	3		R
160	Email	4	18(1)(f)	W
161	Email	3	18(1)(f)	W
162	Email	3	18(1)(f)	W
163	Email	3	18(1)(f)	W
164	Email	2	18(1)(f)	W
165	Email	4	18(1)(f)	W
166	Email	3	18(1)(b)	W
166a	Powerpoint	11	18(1)(b)	W
167	Email	2	18(1)(b)	W
168	Email	3	18(1)(b)	W
169	Email	1		R
170	Email	1		R
171	Email	3	18(1)(b)	W
172	Email	2	18(1)(b)	W
173	Email	3	18(1)(b)	W
174	Email	2	18(1)(b)	W
175	Email	2	18(1)(b)	W
176	Email	2	18(1)(b)	W
177	Email	3	18(1)(f)	W
179	PDF	2		R
180	PDF	3	18(1)(f)	W
181	PDF	3	18(1)(f)	W
182	PDF	1	18(1)(f)	W
183	PDF	2	18(1)(f)	W
184	PDF	2	18(1)(f)	W
185	PDF	2	18(1)(f)	W
186	PDF	3	18(1)(f)	W
190	PDF	2		R
191	PDF	3	18(1)(f)	W
194	PDF	5	18(1)(f)	W
195	PDF	4	18(1)(f)	W
196	PDF	5	18(1)(f)	W
197	PDF	4	18(1)(f)	W
198	PDF	1	18(1)(f)	W
199	PDF	5	18(1)(f)	W
200	PDF	5	18(1)(f)	W
201	PDF	6	18(1)(f)	W
202	PDF	1		R

File #	File Type	# of Pages	Exemption(s)	R or W
203	PDF	2	18(1)(f)	W
204	PDF	1		R
205	Email	1	18(1)(f)	W
205a	Powerpoint	12	18(1)(f)	W
205b	Word	4	18(1)(f)	W
205c	Word	3	18(1)(f)	W
207	Email	1	18(1)(f)	W
207a	JPG	1	18(1)(f)	W
208	Email	1		R
209	Email	1		R
210	Email	1	18(1)(f)	W
212	PDF	1		R
213	Email	1		R
214	Email	1	18(1)(f)	W
215	Email	1	18(1)(f)	W
215a	PDF	2	18(1)(f), 18(1)(b)	W
216	Email	1		R
217	PDF	1		R
218	Email	1	18(1)(f)	W
219	PDF	1	18(1)(f)	W
220	Email	1		R
	Total	575		