



REVIEW REPORT 147-2020

Saskatchewan Government Insurance

August 10, 2022

Summary:

Saskatchewan Government Insurance (SGI) received an access to information request from the Applicant for copies of a threat assessment and all related records. In its response to the request, SGI released some records and withheld others in full or in part pursuant to sections 15(1)(a), (c), (d), (g), (k), (k.1), 17(1)(a), (b)(i), 21 and 29(1) of *The Freedom of Information and Protection of Privacy Act* (FOIP). The Applicant sought a review from the Commissioner stating that they had been refused access to all or part of the record. Upon review the Commissioner found that SGI properly applied section 29(1) of FOIP to pages P003 to P006 and the single data point on page P034. The Commissioner found that SGI did not properly apply sections 15(1)(d), (k.1), 17(1)(a), (b)(i), 21 or 29(1) of FOIP to the items found in Table 2 of this Report. The Commissioner found that SGI properly applied section 21 of FOIP to the remainder of the record. The Commissioner recommended that SGI release the information addressed in Table 2, but continue to withhold the remaining portions of the record.

I BACKGROUND

- [1] The Applicant submitted an access to information request under *The Freedom of Information and Protection of Privacy Act* (FOIP) on April 25, 2020, to Saskatchewan Government Insurance (SGI). The request was for:

Threat Assessment – full documents
From 2019=2020 full years all related information on the threat assessment completed by SGI

- [2] On June 18, 2020, SGI responded to the Applicant’s request indicating it was releasing some records and withholding others in full or in part pursuant to sections 15(1)(a), (c), (d), (g), (k), (k.1), 17(1)(a), (b)(i), 21 and 29(1) of FOIP.
- [3] On June 23, 2020, the Applicant submitted a request for review to my office. The Applicant requested a review of SGI’s application of the exemptions.
- [4] On October 9, 2020, my office provided notification to the Applicant and SGI of my office’s intent to undertake a review of SGI’s application of sections 15(1)(a), (c), (d), (g), (k), (k.1), (k.2), 17(1)(a), (b)(i), 21 and 29(1) of FOIP.

II RECORDS AT ISSUE

- [5] The responsive record was 74 pages of emails, photographs, screenshots, letters, incident reports and other documents of which 37 pages were released in full, 25 pages were severed in full, and 12 pages were severed in part. The following table depicts the exemptions applied to the record:

Table 1			
Pages	Description	Partial/Full	FOIP Exemptions Applied
P003-P006	Security camera image	Partial	29(1)
P007-P010	Email chain	Full	15(1)(d), 15(1)(k.1), 17(1)(a), 17(1)(b)(i), 21, 29(1)
P011, P012	2 separate emails	Partial	15(1)(k.1), 21, 29(1)
P017, P018	Email chain	Full	15(1)(d), 15(1)(k.1), 17(1)(a), 17(1)(b)(i), 21, 29(1)
P020-P024	Screenshot of emails	Full	15(1)(d), 15(1)(k.1), 17(1)(a), 17(1)(b)(i), 21, 29(1)
P027, P028	Email chain and screenshot of email	Partial	15(1)(k.1), 21, 29(1)
P034	Email	Partial	15(1)(k.1), 21, 29(1)
P034	Email	Partial	29(1)

P042, P043	Email chain	Partial	15(1)(d), 15(1)(k.1), 17(1)(a), 17(1)(b)(i), 21, 29(1)
P045 - P047	Email chain	Full	15(1)(d), 15(1)(k.1), 17(1)(a), 17(1)(b)(i), 21, 29(1)
P053-P057	Email chain	Full	15(1)(d), 15(1)(k.1), 17(1)(a), 17(1)(b)(i), 21, 29(1)
P061	Email chain	Full	15(1)(d), 15(1)(k.1), 17(1)(a), 17(1)(b)(i), 21, 29(1)
P062	Email	Partial	15(1)(k.1), 17(1)(a), 17(1)(b)(i), 21, 29(1)
P064-P068	Incident report	Full	15(1)(a), 15(1)(c), 15(1)(d), 15(1)(g), 15(1)(k), 15(1)(k.1), 15(1)(k.2), 17(1)(a), 17(1)(b)(i), 21, 29(1)
P072	Email	Partial	15(1)(k.1), 21, 29(1)

III DISCUSSION OF THE ISSUES

1. Do I have jurisdiction?

[6] SGI is a “government institution” pursuant to section 2(1)(d)(ii) of FOIP and section 3 and Part I of the Appendix of *The Freedom of Information and Protection of Privacy Regulations*. Therefore, I find that I have jurisdiction to conduct this review.

2. Did SGI properly apply section 21 of FOIP?

[7] This issue deals with an incident involving the Applicant and employees at SGI. SGI asserts that the Applicant made threatening remarks, which it reported to the RCMP. SGI also required that all further communication be conducted through a specific email address and the Applicant was prohibited from attending any SGI location without prior approval.

[8] SGI applied section 21 of FOIP as outlined in Table 1 above. SGI also applied other exemptions found in this table, but if section 21 applies, there is no need to consider the application of these other exemptions. Section 21 of FOIP provides:

21 A head may refuse to give access to a record if the disclosure could threaten the safety or the physical or mental health of an individual.

[9] Section 21 of FOIP is a discretionary, harm-based exemption. It permits refusal of access in situations where disclosure of a record could threaten the safety or the physical or mental health of an individual (*Guide to FOIP*, Chapter 4, “Exemptions from the Right of Access”, updated September 30, 2021 [*Guide to FOIP*, Ch. 4], pp. 251 - 254).

[10] My office applies the following test to determine if section 21 of FOIP applies:

Could disclosure of the record threaten the safety or the physical or mental health of an individual?

[11] For section 21 of FOIP, the question that must be answered is “could” disclosure of the record threaten the safety or the physical or mental health of an individual? The threshold for “could” is somewhat lower than a reasonable expectation but well beyond or considerably above mere speculation. On the continuum, speculation is at one end and certainty is at the other. The threshold for “could” therefore, is that which is possible (*Guide to FOIP*, Ch. 4, p. 251).

[12] “Speculative” means engaged in, expressing, or based on conjecture rather than knowledge. “Conjecture” is an opinion or conclusion based on incomplete information. Speculation generally has no objective basis. If the harm is fanciful or exceedingly remote, it is in the realm of speculation or conjecture (*Guide to FOIP*, Ch. 4. pp. 251-252).

[13] “Possible” means capable or existing, happening, or being achieved; that which is not certain or probable (*Guide to FOIP*, Ch. 4. p. 252).

- [14] “Probable” means likely to happen or be the case (*Guide to FOIP*, Ch. 4. p. 252).
- [15] Generally, in determining whether this exemption should be applied, the government institution must assess the risk and determine whether there are reasonable grounds for concluding there is a danger to the health or safety of any person. The assessment must be specific to the circumstances under consideration. Inconvenience, upset or the unpleasantness of dealing with difficult or unreasonable people is not sufficient to trigger the exemption. The threshold cannot be achieved based on unfounded, unsubstantiated allegations. The government institution should be able to detail what the harm is and to whom the harm threatens if the information were released.
- [16] To “threaten” means to be likely to injure; be a source of harm or danger to. It means to create the possibility or risk of harm or jeopardize an individual’s safety or mental or physical well-being (*Guide to FOIP*, Ch. 4. p. 252).
- [17] “Safety” means the state of being protected from or guarded against hurt or injury; freedom from danger (*Guide to FOIP*, Ch. 4. p. 252).
- [18] “Physical health” refers to the well-being of an individual’s physical body. Determination of the effect of a release of information on an individual’s physical health must consider the current or normal state of health of persons who may be affected by the release of information, as well as the decline in health that is expected to occur if the information is disclosed to the applicant (*Guide to FOIP*, Ch. 4. pp. 252-253).
- [19] “Mental health” means the condition of a person in respect of the functioning of the mind. It means the ability of a person’s mind to function in its normal state. Determination of the effect of a release of information on a person’s mental health must, where practicable, be based on a subjective evaluation made on a case-by-case basis. It may be helpful for the head to obtain the assistance of an expert (e.g., a psychiatrist) when making this determination (*Guide to FOIP*, Ch. 4. p. 253).

[20] In its submission to my office, SGI asserted:

...the applicant had made very real and specific threats of harm to SGI physical locations and employees which included “driving the car right through the front window of SGI and lighting it on fire” and “you [name of SGI employee] are next on the chopping block ... it is a promise”, as well as a vague threat to “do something I am going to regret.”

...If [the Applicant] were to have access to these records it *could* further agitate [the Applicant] to act on a specific threat of violence towards [SGI Employee]. [The Applicant] *could* also direct violence towards [other SGI Employee] as [they were] responsible for assessing his threats, reporting them to the RCMP, and imposing restrictions on access to SGI employees and facilities. Therefore, the risk of harm is identified, includes damage or detriment, and disclosure can be connected to the anticipated harm. It is reasonable to conclude that disclosure of these documents *could* result in harm and should be withheld pursuant to section 21.

[21] In a letter to the Applicant dated August 21, 2019, SGI stated:

On August 19, 2019 you left a voicemail for Saskatoon Central Auto Claims indicating “...I would be better off driving the car right through the front windows of SGI and lighting it on fire”

On August 20, 2019 you left a voicemail for Saskatoon Central Auto Claims indicating “...I do not appreciate the cheap attitude and it is actually antagonizing me and I am going to do something I am going to regret...”

On August 21, 2019 the Manager of Saskatoon Central Auto Claims contacted you to discuss your behavior. You stated “...you are next on the chopping block... it is a promise.”

This behavior is unacceptable.

...

You are not to attend any location in person...

At SGI we have a responsibility to ensure the health, safety and welfare of our employees. The Corporation is committed to a respectful work environment for customers, employees, and visitors.

This matter has been reported to the RCMP. Any further inappropriate conduct will be reviewed, and a determination made with respect to further action, up to and including reporting to law enforcement authorities.

[22] It is clear that SGI took these threats seriously. According to its submission to my office, SGI reported this incident to the RCMP:

SGI like any other government institution or employer is limited in the actions that are available to protect its employees and property from harm. One resource that is available however is the criminal justice system. In the likely event that the RCMP proceed to charge [the Applicant] for the threats and any potential actions he chooses to take, it will be because the threats are serious enough to pose a danger to SGI and its employees...

...This is a situation where if charges are brought, it will escalate the anger towards SGI and therefore there will be a reliance on a criminal conviction to protect SGI employees and property from [the Applicant].

[23] Throughout the records, SGI applied section 21 of FOIP to specific names and contact information of individuals in documents such as emails or letters. In addition, it applied section 21 to the entirety of pages P007 to P010, P017, P018, P020 to P024, P045 to P047, P053 to P057, P061, and P064 to P068. Section 21 of FOIP uses the same wording as section 20 of *The Local Authority Freedom of Information and Protection of Privacy Act* (LA FOIP).

[24] In my office's [Review Report 109-2021](#) concerning the Rural Municipality of Rosthern No. 403 (RM), I considered section 20 of LA FOIP. In that matter, the applicant made a request for access to information to the RM regarding a report the RM had conducted on them. The report stemmed from allegations the applicant was being verbally abusive towards RM staff and councillors. The RM argued that releasing the names of those who made complaints against the applicant could spur the applicant to then contact those individuals and harass them. At paragraph [29] of that report, I stated as follows:

Again, the threshold that needs to be met in order for section 20 of LA FOIP to be found to apply in this matter is "could" – it does not have to be a certainty that the outcome will occur. Both the court decision and the investigation report provide details about the Applicant's behaviours that those interviewed would no doubt find uncomfortable, if not threatening, and "could" threaten their mental health. I find, therefore, section 20 of LA FOIP applies to the first sentence on page 3, at the bottom of pages 4, 6, 7 to the top part of page 13, bottom of page 14 to top part of page 16, and

to the last sentence on page 26. As such, I recommend it continue to withhold the portions of those pages pursuant to section 20 of LA FOIP.

- [25] In this matter, the threshold is “could” - it does not need to be a certainty that the Applicant will contact those individuals involved in the Applicant’s case; it only has to be a possibility. In this case, the concern appears to be more about the physical health and safety of SGI staff.
- [26] While not explicitly stated, SGI appears to be asserting that there are two types of information that is being withheld. The first is the information that would identify the employees. The second is information about the file and their decision-making processes related to the threats by the Applicant against SGI. It is reasonable to believe that the release of the individuals names and email addresses could lead to threats against that individual, as there is an example of that happening that was presented to us. Similarly, the information regarding what actions SGI is planning on taking against the Applicant could lead to retaliation against SGI even without identifying a specific individual.
- [27] However, when SGI severed pages in full, there appears to be information contained that does not pertain to threats or dealings with safety concerns. Instead, within some of the fully redacted documents are parts that deal with the Applicant’s ongoing SGI claim, and other innocuous items such as interactions between employees and signature lines. Some pages, such as P021, P022, P024, P053 to P055 and P064 to P068, contain emails and an incident report created by SGI which are obviously directly and entirely related to the threats to health and safety, and should continue to be severed in full. Table 2 in the Appendix provides a description of the parts of the record that were severed in full that have parts that appear to be unrelated to the threat including dates, signature lines and confidentiality notices, details of the Applicant’s claim, and employees discussing work including sending the Applicant letters.
- [28] The submission provided to my office by SGI outlined reasons for using specific exemptions early in the submission. For example, for pages P007 to P010, which were

severed in full, SGI provided an explanation which was five pages long, explaining why sections 15(1)(d), (k.1), 17(1)(a), (b)(i), 21 and 29(1) applied. In later sections, SGI was much more general, instead saying “please refer to analysis presented for documents P007-P010...” in the submission.

[29] I agree with SGI that section 21 of FOIP applies to the partial redactions on P011, P012, P027, P028, P034, P042, P043, P062 and P072. I also agree that section 21 of FOIP applies to the redactions in full on pages P021, P022, P024, P053 to P055 and P064 to P068. This means that there is no need to consider the application of sections 15(1)(a), (c), (g), (k), or (k.2) of FOIP as these exemptions were only applied to P064 to P068, and I have found that these pages were correctly severed subject to section 21 of FOIP. However, I am not convinced that section 21 of FOIP applies to any of the severed information in Table 2. As other exemptions were applied to the same redactions, I will consider later in this Report if any of the other exemptions apply to this information instead.

3. Did SGI properly apply section 29(1) of FOIP?

[30] To each redaction that SGI applied in this record, both in full and in part, they also applied section 29(1) of FOIP. Since my office already found that section 21 of FOIP applies to most of the severed portions of the record, all that is left for my office to review for the application of this exemption is the still images on pages P003 to P006, a single datapoint on page P034, and information contained in Table 2 in the Appendix.

[31] Section 29(1) of FOIP protects the privacy of individuals whose personal information may be contained within records responsive to an access to information request made by someone else. Section 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.

[32] When dealing with information in a record that appears to be personal information, the first step is to confirm that the information indeed qualifies as “personal information” as defined at section 24(1) of FOIP.

[33] SGI’s submission has claimed that portions of security camera still images contain personal information. The image of this person was carefully severed from the photos on pages P003 to P006. The rest of the portions of the photos have been released.

[34] Section 24(1) of FOIP provides:

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 ...

[35] The list provided in section 24(1) of FOIP is not meant to be exhaustive. There can be other types of information that would qualify as personal information that are not listed. Part of the consideration involves assessing if the information has both of the following:

1. Is there an identifiable individual?
2. Is the information personal in nature?

Personal in nature means that the information reveals something personal about the individual. Information that relates to an individual in a professional, official or business capacity could only qualify if the information revealed something personal about the individual for example, information that fits the definition of employment history.

[36] In the submission, SGI asserted:

The photographs also capture another individual in the background. The other individuals gender, hair, body, clothing, posture and location are all visible or can be ascertained based on the photographs. While photographs are not specifically noted in the definition of personal information in subsection 24(1) of FOIP, this list is not intended to be exhaustive. In OIPC reports 107-2014 and LA-2013-002, your office found that ‘photographs of an individual are personal in nature. SGI was able to sever the photographs to exclude the individual in the background, pursuant to subsection 29(1) and give access to most of the record pursuant to section 8 of FOIP.

[37] SGI's assertions are correct. My office has held that a person's image is personal information. There does not appear to be any other identifying information about the individual in these security camera photos. However, despite not identifying the person in the picture, the person is identifiable. They appear to be a bystander who just happens to have been captured on the security camera.

[38] As this person's image is their personal information, I find that SGI properly applied section 29(1) of FOIP to pages P003 to P006.

[39] There is a single data element on page P034 which was severed subject to section 29(1) of FOIP. The description of this data point itself could make the personal information known. On review, this information is personal information as defined under section 24(1) of FOIP. I find that this should continue to be withheld.

[40] The last thing to consider with reference to section 29(1) of FOIP is the contents of Table 2 in this Report. With the exception of pages P003 to P006 and the datapoint on page P034, the submission does not provide any explanation as to why section 29(1) of FOIP applies to any other portion of the record and none was obvious in my office's review of the record. Therefore, I do not find that section 29(1) of FOIP applies to the items listed in Table 2.

[41] I will now consider if the other exemptions apply to the items listed in Table 2

4. Did SGI meet its burden of proof pursuant to section 61 of FOIP for sections 15(1)(d), (k.1), 17(1)(a), and (b)(i) of FOIP?

[42] The remaining exemptions that have been applied to this record are discretionary exemptions. The *Guide to FOIP*, Chapter 2 starting at page 40, describes this category of exemptions. Discretionary exemptions offer discretion for a government institution. In other words, disclosure can still occur even where a discretionary exemption is found to apply. Discretionary exemptions begin with the phrase, "A head **may** refuse...".

[43] Section 61 of FOIP provides:

61 In any proceeding pursuant to this Act, the burden of establishing that access to the record applied for may or must be refused or granted is on the head concerned.

[44] Section 61 of FOIP provides that the government institution has the burden of proof if it claims that access should or must be refused under FOIP. The burden is not on the applicant to establish that an exemption does not apply. Burden of proof is the obligation of one of the parties in a review to persuade the Commissioner to decide an issue in its favour.

[45] When it is said that a party has the “burden of proof”, what is meant is that one party has a duty in law first to bring forward evidence that a particular fact or situation exists, and then to persuade the Commissioner that the evidence meets the necessary standard of proof.

[46] I will now assess if SGI has met its burden of proof.

Section 15(1)(d) of FOIP

[47] Section 15(1)(d) of FOIP is a discretionary exemption and provides:

15(1) A head may refuse to give access to a record, the release of which could:

...

(d) be injurious to the Government of Saskatchewan or a government institution in the conduct of existing or anticipated legal proceedings;

[48] In order for section 15(1)(d) of FOIP to be found to apply, both parts of the following test must be met:

1. The proceedings must qualify as existing or anticipated legal proceedings; and
2. The disclosure of the records could be injurious to the public body in the conduct of legal proceedings.

(Guide to FOIP, p. 54 to 57)

[49] The second part of the test requires that disclosure of the records could be injurious to the public body. The remaining portions outlined in Table 2 do not involve legal proceedings, and instead mainly involve the provision of service to the Applicant for their SGI claim. Even if the entire severed documents were intended to be used in a legal proceeding, no argument was provided why the parts mentioned in Table 2 would meet this condition. For that reason, I find that SGI has not met its burden of proof and I find that section 15(1)(d) of FOIP does not apply to the parts outlined in Table 2.

Section 15(1)(k.1) of FOIP

[50] Section 15(1)(k.1) of FOIP is a discretionary exemption and provides:

15(1) A head may refuse to give access to a record, the release of which could:

...

(k.1) endanger the life or physical safety of a law enforcement officer or any other person;

[51] Section 15(1)(k.1) of FOIP is a discretionary harm-based exemption. It permits refusal of access in situations where release of a record could endanger the life or physical safety of a law enforcement officer or any other person.

[52] The following two-part test can be applied:

1. Who is at risk of harm (law enforcement officer or another person)?
2. Could disclosure endanger the life or physical safety of that person?

(Guide to FOIP, pp. 79 to 80)

[53] The second part of the test requires that disclosure of the records could endanger the life or physical safety of a person identified in the first part of the test. As above, the remaining portions outlined in Table 2 primarily deal with the Applicant's SGI claim. Even if this information involved law enforcement or had been presented to the RCMP, no argument

was presented as to why the portions outlined in Table 2 could endanger the life or physical safety of any person. For that reason, I find that SGI has not met its burden of proof and I find that section 15(1)(k.1) of FOIP does not apply to the parts outlined in Table 2.

Section 17(1)(a) of FOIP

[54] Section 17(1)(a) of FOIP is a discretionary exemption and provides:

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;

[55] My office uses the following two-part test to determine if section 17(1)(a) of FOIP applies:

1. Does the information qualify as advice, proposals, recommendations, analyses or policy options?
2. Was the advice, proposals, recommendations, analyses and/or policy options developed by or for a government institution or a member of the Executive Council?

(Guide to FOIP, pp. 123 to 130)

[56] In SGI's submission, it stated that this exemption was applied as the records related to the background circumstances to provide guidance for communications and safety as it pertained to the Applicant. Again, like above, the items found in Table 2 do not appear to involve advice and do not appear to be related to safety, as asserted by SGI. I find that SGI has not met its burden of proof and that section 17(1)(a) of FOIP does not apply to parts outlined in Table 2.

Section 17(1)(b)(i) of FOIP

[57] Section 17(1)(b)(i) of FOIP is a discretionary exemption and provides:

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

...

(b) consultations or deliberations involving:

(i) officers or employees of a government institution;

...

[58] Section 17(1)(b) of FOIP is a discretionary class-based exemption. It permits refusal of access in situations where release of a record could reasonably be expected to disclose consultations or deliberations involving officers or employees of a government institution, a member of the Executive Council or the staff of a member of the Executive Council.

[59] My office uses the following two-part test to determine if section 17(1)(b) of FOIP applies:

1. Does the record contain consultations or deliberations?
2. Do the consultations or deliberations involve officers or employees of a government institution, a member of the Executive Council, or the staff of a member of the Executive Council?

(Guide to FOIP, Ch. 4, pp.123-130)

[60] In SGI's submission, it stated that this exemption was applied as the records contained specific consultations between employees. It stated that consultations were for the purpose of developing a strategy to manage communications and to protect SGI's employees and property. Again, like above, the portions of the record described in Table 2 do not appear to involve strategy or to manage communications, as asserted by SGI and are instead primarily discussing the Applicant's SGI claim. I find that SGI has not met its burden of proof and that section 17(1)(b) of FOIP does not apply to parts outlined in Table 2.

IV FINDINGS

[61] I find that SGI properly applied section 29(1) of FOIP to pages P003 to P006 and the single data point on page P034.

[62] I find that SGI did not properly apply section 15(1)(d), (k.1), 17(1)(a), (b)(i), 21 or 29(1) of FOIP to the items found in Table 2 of this Report.

[63] I find that SGI properly applied section 21 of FOIP to the remainder of the record not addressed by Table 2.

V RECOMMENDATIONS

[64] I recommend that SGI release the information addressed in Table 2 of this Report in the Appendix.

[65] I recommend that SGI continue to withhold the remaining portions not addressed by Table 2.

Dated at Regina, in the Province of Saskatchewan, this 10th day of August, 2022.

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

Appendix

Table 2		
	Location	Description
1	Page 007, header section of email.	Date.
2	Page P007, second email in chain, sentences 2 and 3.	Appear to be discussing the applicant's SGI claim.
3	Page P007, second email in chain, sentence 5.	Appear to be discussing the applicant's SGI claim.
4	Page P007, second email in chain, sentences 7,8, and 9.	Appear to be discussing the applicant's SGI claim.
5	Top of page P008, continuation of previous email.	Signature line, the fax number, toll free number, logo and confidentiality notice.
6	Middle of page P008, body of email.	Body of this email deals entirely with the SGI claim.
7	Bottom of page P008, second last email, the body of the email.	Deals with the SGI claim.
8	Middle of Page P009, body of the email.	Deals with the SGI claim.
9	Bottom of page P009, the entire body of the email.	Deals with the SGI claim.
10	Top of page P010.	Signature line, the fax number, toll free number, logo and confidentiality notice.
11	Page P017, header section of the email.	Date.
12	Page P017, Main body of first email in chain.	Discusses sending the applicant a letter.
13	Page P017, second email in chain, body of email.	Discusses sending the applicant a letter.
14	Page P017, Bottom of page.	Signature line, the fax number, toll free number, logo and confidentiality notice.
15	Page P018, body of email.	Discusses sending the applicant a letter.
16	Page P023, screenshot of Email, Identical to the second email in the chain on page P007.	Identical to page 7.
17	Page P045, first email in chain, body of email.	Employee discussing work.
18	Page P045, second email in chain, body of email.	Employee discussing work.
19	Page P045, third email in chain, body of email.	Employees discussing about the Applicant's SGI claim.
20	Page P045, continuation of third email in chain.	Appears to be a draft version of a letter to be sent to the Applicant regarding the Applicant's SGI claim.

21	Page P046, second email in chain, body of email.	Employees discussing work.
22	Page P046, third email in chain, Body of email.	Employee talking about the Applicant's SGI file.
23	Page P047, second email in chain, body of email.	Employees discussing work.
24	Page P047, third email in chain, body of email.	Employee discussing work.
25	Page P047, bottom of the page, body of forth email.	Employees discussing a response to Applicant's email.
26	Page P055, bottom of page.	Confidentiality clause on signature line.
27	Page P056, body of first email.	Employees talking about a letter. Appears to be about the SGI claim.
28	Page P056, body of second email in chain.	Employees talking about letter. Appears to be about the SGI claim.
29	Page P056, bottom of page continuing to top of page 57, body of third email in chain.	Employees discussing a letter to be sent to the Applicant. Appears to be about the SGI claim.
30	Page P057, second email in chain, body of email.	Appears to be part of the Applicant's SGI claim.
31	Page P061, top of page, body of first email.	Appears to be discussing a letter; content does not appear to have anything relating to the threat, instead just appears to be employees discussing work.
32	Page P061, middle of page, second email in chain.	Appears to be discussing a letter; content does not appear to have anything relating to the threat, instead just appears to be employees discussing work.