



Office of the  
Saskatchewan Information  
and Privacy Commissioner

## REVIEW REPORT 254-2022

### Saskatoon Police Service

April 11, 2023

**Summary:** The Applicant submitted an access to information request to the Saskatoon Police Service (SPS). SPS provided access to some of the records, but withheld others pursuant to subsections 13(1)(b), 14(1)(c), (k), 16(1)(a), (b), 20, 21(a) and 28(1) of *The Local Authority Freedom of Information and Protection of Privacy Act*. The Applicant appealed to the Commissioner. The Commissioner made a number of findings and recommendations, which are summarized in the Appendix of this Report.

### I BACKGROUND

[1] On September 29, 2022, the Saskatoon Police Service (SPS) received the following access to information request from the Applicant:

I am requesting all video from all camera's [sic] around the door marked 76A at the professional [sic] standards door.

Any video from the professional [sic] standard division office or offices. these [sic] videos will be dated:

Sept 28<sup>th</sup>/2022 between 12:45 PM to 3:00 pm the same date Sept 27 2022.

I would like any communications from STFF SRGT [first and last name] of the professional [sic] standards to anyone that is part of Saskatoon Police Service and any communication with Public Complainers [sic] Commission. Regarding my name [First and last name of Applicant]  
D.O.B. [Applicant's date of birth]  
[Applicant's Address]

Communication do not involve any investigations [sic]. Anything that are under criminal investigation can be held.

Anything not dealing with immediate investigation should be released.

Any emails, phone records.

...

P.S. If there is audio with the video's [sic] please add that as well.

Thank you!

P.S.S.

Please attach [sic];

The other detectives NAME and badge number to said request and the civilian secretary's employee number

[2] In a letter dated October 26, 2022 to the Applicant, SPS indicated that it would be extending the 30-day respond period by an additional 30 days pursuant to subsection 12(1)(a)(ii) of *The Local Authority Freedom of Information and Protection of Privacy Act* (LA FOIP).

[3] Then, in a letter dated December 16, 2022, SPS responded to the Applicant's access request. It indicated that it divided the Applicant's access request into the following five parts:

1. Video/audio recordings from cameras in/around the door marked 76A of the Saskatoon Police Service Headquarters (Professional Standards Division) on September 28, 2022 between 1200 and 1500 hours involving yourself;
2. Any and all communications to/from Staff Sergeant [name] and members of the Saskatoon Police Service or the Public Complaints Commission about yourself;
3. Notes/reports taken following your interaction with the Professional Standards Division on September 28, 2022;
4. The name and badge number of the officer you had interacted with while at the Professional Standards Division office on September 28, 2022; and
5. The employee number of the secretary present in the Professional Standards Division office on September 28, 2022.

[4] SPS's letter enclosed copies of records responsive to the Applicant's access request. However, it said it withheld some of the information within the records. SPS cited subsections 13(1)(b), 14(1)(c), (k), 16(1)(a), (b), 20 and 28(1) of LA FOIP. It then provided a table to outline which records were disclosed and which records were withheld.

- [5] On December 19, 2022, the Applicant requested a review by my office.
- [6] On January 5, 2023, my office notified both the Applicant and the SPS that my office would be undertaking a review.
- [7] On March 6, 2023, my office received a submission from SPS. My office did not receive a submission from the Applicant.

**II RECORDS AT ISSUE**

[8] The records at issue are as follows:

<b>Record #</b>	<b>Description</b>	<b>LA FOIP Exemption(s) applied by SPS</b>
Record 1.1	Video that is 19 minutes and 21 seconds in length. The video has no audio.	14(1)(c) of LA FOIP
Record 1.2	Video that is 19 minutes and 22 seconds in length. The video has no audio.	14(1)(c) of LA FOIP
Record 1.3	Video that is 19 minutes and 21 seconds in length. The video has no audio.	14(1)(c) of LA FOIP; 28(1) of LA FOIP
Record 1.4	Video that is 3 minutes and 19 seconds in length. The video has no audio.	14(1)(c) of LA FOIP; 20 of LA FOIP
Record 3	261 pages of emails. The pages are paginated from 1 to 261.  SPS claimed solicitor-privilege (subsection 21(a) of LA FOIP) to pages 44 to 45, 63 to 70, 115 to 116, 122 to 127, 170 to 172, 182 to 251, and 260. In total, there were 92 pages of R3 to which SPS claimed solicitor-client privilege.	13(1)(b), 14(1)(c), 14(1)(k), 16(1)(a), 16(1)(b), 20, 21(a), 28(1) of LA FOIP
Record 3-P42	Voicemail attached to email on page 42 of R3.	14(1)(k) of LA FOIP
Record 3-P44	Voicemail attached to email on page 44 of R3.	14(1)(k) of LA FOIP
Record 3-P46	Voicemail attached to email on page 46 of R3.	14(1)(k) of LA FOIP
Record 3-P47	Voicemail attached to email on page 47 of R3.	14(1)(k) of LA FOIP
Record 3-P49	Voicemail attached to email on page 49 of R3.	14(1)(k) of LA FOIP

Record 3-P51	Voicemail attached to email on page 51 of R3.	14(1)(k) of LA FOIP
Record 3-P52	Voicemail attached to email on page 52 of R3.	14(1)(k) of LA FOIP
Record 3-P54	Voicemail attached to email on page 54 of R3.	14(1)(k) of LA FOIP
Record 3-P56	Voicemail attached to email on page 56 of R3.	14(1)(k) of LA FOIP
Record 3-P58	Voicemail attached to email on page 58 of R3.	14(1)(k) of LA FOIP
Record 3-P60	Voicemail attached to email on page 60 of R3.	14(1)(k) of LA FOIP
Record 3-P62	Voicemail attached to email on page 62 of R3.	14(1)(k) of LA FOIP

### III DISCUSSION OF THE ISSUES

#### 1. Do I have jurisdiction?

[9] SPS is a “local authority” as defined by subsection 2(f)(viii.1) of LA FOIP. Therefore, I find that I have jurisdiction to review this matter.

#### 2. Did SPS properly apply subsection 14(1)(k) of LA FOIP?

[10] SPS applied subsection 14(1)(k) of LA FOIP to pages 1 to 16, 21 to 261 of Record 3 and to the twelve voicemails.

[11] Subsection 14(1)(k) of LA FOIP provides:

**14(1)** A head may refuse to give access to a record, the release of which could:

...  
(k) interfere with a law enforcement matter or disclose information respecting a law enforcement matter;

[12] My office uses the following two-part test to determine if subsection 14(1)(k) of LA FOIP applies.

1. Is there a law enforcement matter involved?
2. Does one of the following exist?
  - a. Could the release of information interfere with a law enforcement matter?
  - b. Could the release of information disclose information with respect to a law enforcement matter?

(*Guide to LA FOIP*, Chapter 4 “Exemptions from the Right of Access”, Ch. 4, [*Guide to LA FOIP*, Ch. 4], pp. 74-77)

[13] The following is an analysis to determine if the two-part test is met.

***1. Is there a law enforcement matter involved?***

[14] “Law enforcement” matter includes:

- Policing, including criminal intelligence operations, or
- Investigations, inspections or proceedings conducted under the authority of or for the purpose of enforcing an enactment which lead to or could lead to a penalty or sanction being imposed under the enactment.

(*Guide to LA FOIP*, Ch. 4, pp. 75-76)

[15] “Policing” refers to the activities of police services. This means activities carried out under the authority of a statute regarding the maintenance of public order, detection and prevention of crime or the enforcement of law (*Guide to LA FOIP*, Ch. 4, p. 75).

[16] “Matter” should be given its plain and ordinary meaning. It does not necessarily have to apply to some specific ongoing investigation or proceeding (*Guide to LA FOIP*, Ch. 4, p. 76).

[17] In its submission, SPS said the records detail interactions between members of the SPS and the Applicant. The purpose was to “advise administration” of the Applicant’s behaviour towards SPS members or to discuss options for managing interactions with the Applicant.

[18] SPS indicated that the preservation of peace and maintenance of public order are part of the police as well as the prevention of crime and other offences. It cited subsection 36(2)(a) of *The Police Act, 1990*, which says:

**36(2)** Unless otherwise indicated in his or her appointment, a member has the power and the responsibility to:

(a) perform all duties that are assigned to constables or peace officers in relation to:

(i) the preservation of peace;

(ii) the prevention of crime and offences against the laws in force in the municipality; and

(iii) the apprehension of criminals, offenders and others who may lawfully be taken into custody;

[19] Based on a review of the records, my office noted that the majority document challenging interactions between sworn and civilian members of the SPS and the Applicant that occurred in-person and by telephone. The records may also describe different tactics of managing interactions with the Applicant. While I acknowledge that the records document challenging interactions involving SPS members, I find that this does not qualify as a “law enforcement matter”. It does not appear that activities undertaken by the SPS as documented in these records were carried out under the authority of a statute regarding the maintenance of public order. The content of the records show that the activities undertaken by the SPS appear to be similar tactics carried out by any other government institution and/or local authority must do when engaged in challenging interactions with members of the public. For example, referring the Applicant to a higher authority. Therefore, I find that SPS has not properly applied subsection 14(1)(k) of LA FOIP to the majority of the records to which SPS applied the exemption.

[20] However, I find that SPS properly applied subsection 14(1)(k) of LA FOIP to the body of an email timestamped 11:53 a.m. on page 120 of Record 3. The body of the email is regarding an exhibit related to a particular SPS case file. It appears that SPS’ activities were pursuant to subsection 36(2) of *The Police Act, 1990* in that it responded to a call for service. Both parts of the two-part test is met.

[21] My findings and recommendations are set out in the Appendix.

**3. Did SPS properly apply subsection 14(1)(c) of LA FOIP?**

[22] SPS applied subsection 14(1)(c) of LA FOIP to Records 1.1, 1.2, 1.3, 1.4 (the four videos with no audio) and pages 14, 17 to 20, 30 to 31, 33 to 34, 38 to 40, 80, 85, 97 to 103, 155 to 156, 158 to 159, 163 to 166 of Record 3.

[23] Subsection 14(1)(c) of LA FOIP provides:

**14(1)** A head may refuse to give access to a record, the release of which could:

...

(c) interfere with a lawful investigation or disclose information with respect to a lawful investigation;

[24] My office uses the following two-part test to determine if subsection 14(1)(c) of LA FOIP applies:

1. Does the activity qualify as a “lawful investigation”?
2. Does on the following exist?
  - a) Could the release of the information interfere with a lawful investigation?
  - b) Could the release disclose information with respect to a lawful investigation?

*(Guide to LA FOIP, Ch. 4, pp. 52 to 53)*

[25] The following is an analysis to determine if the two-part test is met.

***1. Does the activity qualify as a “lawful investigation”?***

[26] A lawful investigation is an investigation that is authorized or required and permitted by law. The investigation can be concluded, active and ongoing or be occurring in the future.

In order to meet this part of the test, the local authority should identify the legislation under which the investigation is occurring (*Guide to LA FOIP*, Ch. 4, at p. 52).

[27] In its submission, SPS said the following:

As a police service, many of the activities of the SPS qualify as a lawful investigation. It should be noted that the police's powers of investigation are broad and stem from various pieces of legislation both provincially and federally, and to narrow the issue down to a specific section of legislation would not be an accurate reflection of those powers. However, among the police powers of investigation, section 36(2) of *The Police Act, 1990*, provide the SPS with the authority to conduct lawful investigations and enforce respective laws. **Within the records contains discussions surrounding investigations involving third parties, specifically investigations into complaints under the Police Act, or investigations into offences under the Criminal Code and/or Police Act, many of which do not involve the Applicant directly.**

[Emphasis added]

[28] Based on a review of the records to which SPS applied subsection 14(1)(c) of LA FOIP, my office found that some of the pages reflected investigations by the Public Complaints Commission (PCC) regarding complaints PCC received under *The Police Act, 1990*. For example, pages 17 to 20 and pages 97 to 102 of Record 3 are regarding a PCC investigation into a complaint it received. Further pages 33 and 158 of Record 3 are summary of allegations that were investigated by PCC.

[29] Subsection 45(1) of *The Police Act, 1990* provides the PCC with the mandate to cause investigations into complaints against police officers to be conducted. Subsection 45(1) of *The Police Act, 1990* provides:

**45(1)** If a public complaint is a complaint concerning the actions of a member, the PCC, in consultation with the chief, shall cause an investigation into the complaint to be conducted in accordance with this section as soon as is practicable following the receipt of the complaint.

[30] Pages 17 to 20, 97 to 102, 33 and 158 of Record 3 reflect activities that qualify as part of a "lawful investigation". I find that the first part of the test is met for pages 17 to 20, 97 to 102, 33 and 158 of Record 3. I will consider whether the second part of the two-part test is met for these pages.



- [31] I note SPS' comment that some of the records do not involve the Applicant directly. For example, pages 163 to 166 are regarding a matter involving third party individuals. I will consider records such as these pages in my analysis of subsection 28(1) of LA FOIP later in this Report.
- [32] Further in its submission, SPS said it was withholding Records 1.1, 1.2, 1.3, 1.4 (the four videos with no audio) "due to an impending public complaint to the PCC by the Applicant." In the course of this review, my office sought documentation from SPS that demonstrated PCC had undertaken an investigation into a complaint by the Applicant and documentation that shows that the videos had been provided by SPS to PCC for the purpose of PCC's investigation.
- [33] SPS indicated neither it nor PCC has received a public complaint yet. It said that "there is a high expectation that a complaint will be received" and said that the "past actions" of the Applicant supports the expectation.
- [34] SPS highlighted that page 52 of Chapter 4 of my office's *Guide to LA FOIP* that the investigation "can be concluded, active and ongoing or be occurring in the future". It noted that page 52 of Chapter 4 of *Guide to LA FOIP* is based on *Leo v. Global Transportation Hub Authority*, 2019 SKQB 150, where the Court of King's Bench said subsection 15(1) of *The Freedom of Information and Protection of Privacy Act* (FOIP) apply to more than just specific ongoing investigations or proceedings. It applies to both active and closed matters. I also made this finding in [Review Report 210-2022](#) at paragraphs [21] to [22]. Subsection 14(1) of LA FOIP is similar to subsection 15(1) of FOIP. Therefore, subsection 14(1) of LA FOIP applies to more than just specific ongoing investigation or proceedings. It can apply to concluded, active and ongoing or future investigations.
- [35] In my office's [Review Report 109-2022](#) at paragraph [47], I considered subsection 15(1)(c) of *The Freedom of Information and Protection of Privacy Act* (FOIP) and the Federal Court of Appeal's decision [Rubin v. Canada \(Minister of Transport\) \(C.A.\), 1997 CanLII 6385](#)

[\(FCA\), \[1998\] 2 FC 430](#) . Subsection 15(1)(c) of FOIP is similar to subsection 14(1)(c) of LA FOIP. I said:

While I acknowledge that the wording in the provisions in BC FOIP and ATIA that are similar but not identical to subsection 15(1)(c) of FOIP, I take guidance from BC IPC's decisions as well as from the Federal Court of Appeal's *Rubin v. Canada*. That is, government institutions cannot refuse to disclose information on the basis that the disclosure would interfere with the government institution's ability to conduct investigations in the future generally. They must speak specifically to how the disclosure would interfere with a specific lawful investigation. **If the government institution believes that the disclosure of the information would interfere with a future investigation, the future investigation should be "about to be undertaken", as stated in *Rubin v. Canada*.**

[Emphasis added]

[36] Similarly, if a local authority is relying on subsection 14(1)(c) of LA FOIP to withhold records that may relate to a future investigation, the future investigation should be "about to be undertaken". In this case, while there is a possibility that the Applicant may submit a complaint to PCC in the future, there is no indication that a future investigation is "about to be undertaken". The first part of the test is not met for Records 1.1, 1.2, 1.3, and 1.4. I find that SPS did not properly apply subsection 14(1)(c) of LA FOIP Records 1.1, 1.2, 1.3, and 1.4. Later, I will consider whether subsection 28(1) of LA FOIP applies to these four videos.

***2. Does on the following exist?***

***a) Could the release of the information interfere with a lawful investigation?***

***b) Could the release disclose information with respect to a lawful investigation?***

[37] I will consider whether the second part of the two-part test is met for pages 17 to 20, 97 to 102, 33 and 158 of Record 3.

[38] To meet the second part of the test, it is only necessary for the local authority to demonstrate that the information in the record is information with respect to a lawful investigation. With respect to are words of the widest possible scope; the phrase is probably the widest of any

expression intended to convey some connection between two related subject matters (*Guide to LA FOIP*, Ch. 4, at p. 53).

[39] In its submission, SPS argued that the release of the records could release of the information would disclose information with respect to a lawful investigation. Based on a review of pages 17 to 20, 97 to 102, 33 and 158 of Record 3, I find that the release of the information would disclose information with respect to lawful investigations.

[40] Therefore, I find that SPS properly applied subsection 14(1)(c) of LA FOIP to pages 17 to 20, 97 to 102, 33 and 158 of Record 3. See the Appendix for my findings and recommendations.

#### **4. Did SPS properly apply section 20 of LA FOIP?**

[41] SPS applied section 20 of LA FOIP to portions of pages 4, 10, 14 to 15, 21, 23 to 25, 28, 35, to 36, 38, 42, 46 to 47, 49, 51 to 52, 54, 56, 58, 60, 62, 80, 112, 128, 136, 252, and 255 of Record 3. SPS also applied section 20 to Record 1.3.

[42] Section 20 of LA FOIP provides:

**20** 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.

[43] The threshold for “could” is somewhat lower than a reasonable expectation. On the threshold, speculation is at one end, and probable (or “could reasonably be expected”) is at the other. The middle ground for “could” therefore, is “that which is possible” (*Guide to LA FOIP*, Ch. 4, at p. 215).

[44] 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 wellbeing (*Guide to LA FOIP*, Ch. 4, at p. 216).

- [45] “Safety” means the state of being protected from or guarded against hurt or injury; freedom from danger (*Guide to LA FOIP*, Ch. 4, at p. 216).
- [46] “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 (*Guide to LA FOIP*, Ch. 4, at p. 216).
- [47] In its submission, SPS described the harm that “could” cause mental distress to a particular person. It provided my office with contextual information as to why it believes the release the information “could” cause mental distress to a particular person. Based on a review of the records as well as SPS’ submission, I find that SPS properly applied section 20 of LA FOIP to pages 4, 10, 14 to 15, 21, 23 to 25, 28, 35, to 36, 38, 42, 46 to 47, 49, 51 to 52, 54, 56, 58, 60, 62, 80, 112, 128, 136, 252, and 255 of Record 3. Also, I find that SPS properly applied section 20 of LA FOIP to 2:55 to 3:19 of Record 1.4. See Appendix for my findings and recommendations.

##### **5. Did SPS properly apply subsection 28(1) of LA FOIP?**

- [48] SPS applied subsection 28(1) of LA FOIP to portions of pages 6, 14 to 15, 23 to 24, 28 to 29, 31 to 35, 38 to 41, 58, 71, 78, 80, 90 to 91, 93, 96, 111, 119, 128, 135, 147, 151, 154, 156 to 160, 163 to 166, 168, 172, 178, and 255. It also indicated subsection 28(1) of LA FOIP applies to 00:04 to 00:06 and 00:19 to 00:20 of Record 1.3 (video with no audio).
- [49] Also, earlier in this Report, I said I would determine if subsection 28(1) of LA FOIP applies to Records 1.1, 1.2, 1.3, and 1.4. Although SPS did not raise subsection 28(1) of LA FOIP, I must consider subsection 28(1) of LA FOIP as it is mandatory exemption.
- [50] Subsection 28(1) of LA FOIP provides:

**28(1)** No local authority 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 29.

[51] In order for subsection 28(1) of LA FOIP to apply, I must first find that the information constitutes third party “personal information”. Subsection 23(1) of LA FOIP defines “personal information” and provides some examples of the types of information that can be considered personal information. In this matter, subsections 23(1)(a), (b), (c), (f), (k)(i) and (ii) of LA FOIP, which provide as follows, are relevant:

**23(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:

(a) information that relates to the race, creed, religion, colour, sex, sexual orientation, family status or marital status, disability, age, nationality, ancestry or place of origin of the individual;

(b) information that relates to the education or the criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved;

(c) information that relates to health care that has been received by the individual or to the health history of the individual;

...

(f) the personal opinions or views of the individual except where they are about another individual;

...

(h) the views or opinions of another individual with respect to the individual;

...

(k) the name of the individual where:

(i) it appears with other personal information that relates to the individual; or

(ii) the disclosure of the name itself would reveal personal information about the individual.

[52] The list of examples of personal information in subsection 23(1) of LA FOIP is not exhaustive. To qualify as “personal information”, the information must be 1) be about an identifiable individual, and 2) be personal in nature.

[53] In its submission, SPS indicated it applied subsection 28(1) of LA FOIP to the following types of information of individuals other than the Applicant (or of third party individuals):

- Name,
- Date of birth,
- Sex,
- Details of third party's interaction with police, including criminal history,
- Disciplinary and/or complaint information about officers, and
- Personal opinions about third parties.

[54] Based on a review of the portions of the records to which SPS applied subsection 28(1) of LA FOIP in Record 3, I find that the information qualifies as "personal information" as defined by subsections 23(1)(a), (b), (c), (f), (h), (k)(i) and (ii) of LA FOIP.

[55] Where the information is about a third-party individual and the information was not supplied by the Applicant, I find that SPS properly applied subsection 28(1) of LA FOIP to that information.

[56] However, in many cases, the personal information of the third-party individuals was supplied by the Applicant. As noted in my office's [Review Report 111-2022](#), I had found that the absurd result principle applies where:

- the requester provided the information to the public body
- the requester was present when the information was presented to the public body and
- the information is clearly within the requester's knowledge.

[57] As such, it would be an absurd result to withhold such information from the Applicant. Therefore, in cases where the Applicant supplied the information to the SPS, I find that SPS did not properly apply subsection 28(1) of LA FOIP to that information.

[58] Based on a review of the videos, 00:04 to 00:06 and 00:19 to 00:20 of Record 1.3 show the images of individuals reflected in windows walking by the SPS building. I find that such information qualifies as "personal information" as defined by subsection 23(1) of LA FOIP

as it is about an identifiable individual and is personal in nature. This would be similar to my finding that an image of a bystander captured on the security camera to qualify as “personal information” in my office’s [Review Report 147-2020](#) at paragraphs [37] to [38]. I find that SPS properly applied subsection 28(1) of LA FOIP to 00:04 to 00:06 and 00:19 to 00:20 of Record 1.3.

[59] I note that in my office’s [Review Report 023-2019, 098-2019](#), I had recommended that SPS implement technology that would enable it to blur out the images individuals from camera recordings. On November 26, 2019, SPS responded by indicating it accepted the recommendation, but it would not adopt such technology that particular budget year. It is my hope that SPS has since adopted and implemented such technology and is able to blur the images then release Record 1.3 to the Applicant.

[60] My findings and recommendations are set out in the Appendix.

## **6. Did SPS properly apply subsection 21(a) of LA FOIP?**

[61] For this review, SPS provided my office with a copy of the records at issue.

[62] SPS applied subsection 21(a) of LA FOIP to pages 44 to 45, 63 to 70, 115 to 116, 122 to 127, 170 to 172, 182 to 251, and 260 of Record 3.

[63] Subsection 21(a) of LA FOIP provides:

**21** A head may refuse to give access to a record that:

(a) contains any information that is subject to any privilege that is available at law, including solicitor-client privilege;

[64] My office uses the following three-part test to determine if subsection 21(a) of LA FOIP applies:

1. Is the record a communication between solicitor and client?

2. Does the communication entail the seeking or giving of legal advice?
3. Did the parties intend for the communication to be treated confidentially?

*(Guide to LA FOIP, Ch. 4, pp. 221-225)*

[65] The following is my analysis to determine if the three-part test is met.

***1. Is the record a communication between solicitor and client?***

[66] A “communication” is the process of bringing an idea to another’s perception; the message or ideas so expressed or exchanged; the interchange of messages or ideas by speech, writing, gestures or conduct *(Guide to LA FOIP, Ch. 4, p. 221)*.

[67] A “client” means a person who consults a lawyer and on whose behalf the lawyer renders or agrees to render legal services; or having consulted the lawyer, reasonably concludes that the lawyer has agreed to render legal services on their behalf. It includes a client of the law firm in which the lawyer is a partner or associate, whether the lawyer handles the client’s work *(Guide to LA FOIP, Ch. 4, p. 222)*.

[68] A “lawyer” means a member of the Law Society and includes a law student registered in the Society’s pre-call program *(Guide to LA FOIP, Ch. 4, p. 222)*.

[69] The local authority should make it clear who the solicitor is and who the client is.

[70] In its submission, SPS noted that the records at issue are email chains. Email chains qualify as a “communication” as defined above.

[71] Further, SPS identified that the solicitor is its Director of Legal Services, who is a practicing lawyer and a member of Saskatchewan’s Law Society. The client is SPS.

[72] I find that the first part of the test is met.

***2. Does the communication entail the seeking or giving of legal advice?***



[73] “Legal advice” means a legal opinion about a legal issue and a recommended course of action, based on legal considerations, regarding a matter with legal implications (*Guide to LA FOIP*, Ch. 4, p. 224).

[74] In its submission, SPS asserted that the communication entails the seeking or giving of legal advice. Specifically, SPS sought legal advice from its Director of Legal Services regarding options available to SPS on how to communicate SPS’ expectations to the Applicant regarding their (the Applicant’s) conduct. Based on a review of the records, my office found that the emails exchanged entails the seeking and/or giving of legal advice. I find that the second part of the test is met.

**3. Did the parties intend for the communication to be treated confidentially?**

[75] There must be an expectation on the part of the local authority that the communication will be confidential. “Not every aspect of relations between a lawyer and a client is necessarily confidential”. Conduct which is inconsistent with an expectation of confidentiality can constitute a waiver of privilege. Confidentiality is the sine qua non of privilege. Without confidentiality there can be no privilege and when confidentiality ends so too should the privilege (*Guide to LA FOIP*, Ch. 4, p. 225).

[76] As a general rule, the client (usually a local authority) must not have disclosed the legal advice (either verbally or in writing) to parties who are outside of the solicitor-client relationship (*Guide to LA FOIP*, Ch. 4, p. 226)

[77] In its submission, SPS asserted that the communications and information were intended to be confidential and have been consistently treated as confidential. Based on materials provided to my office in this review, as well based on a review of the records at issue, I agree with SPS that the communication appears to have been intended to be confidential. I find that the third part of the test is met.

[78] I find that SPS properly applied subsection 21(a) of LA FOIP to pages 44 to 45, 63 to 70, 115 to 116, 122 to 127, 170 to 172, 182 to 251, and 260 of Record 3.

[79] My findings and recommendations are set out in the Appendix.

**7. Did SPS properly apply subsection 16(1)(a) of LA FOIP?**

[80] SPS applied subsection 16(1)(a) of LA FOIP to pages 71, 136 and 164 of Record 3

[81] Subsection 16(1)(a) of LA FOIP provides:

**16(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 the local authority;

[82] My office uses the following two-part test to determine if subsection 16(1)(a) of LA 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 the local authority?

*(Guide to LA FOIP, Ch. 4, pp. 105-108)*

[83] Below is an analysis to determine if the two-part test is met.

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

[84] In its submission, SPS asserted that pages 71, 136 and 164 contain “advice”.

[85] “Advice” is guidance offered by one person to another. It can include 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 encompasses material that permits the drawing of inferences with respect to a suggested course of action, but which does not itself make a specific recommendation (*Guide to LA FOIP*, Ch. 4, pp. 105-106).

- [86] Advice includes the views or opinions of a public servant as to the range of policy options to be considered by the decision maker even if they do not include a specific recommendation on which option to take (*Guide to LA FOIP*, Ch. 4, p. 106).
- [87] Page 71 contains an email exchange where SPS applied subsection 16(1)(a) of LA FOIP to two emails. In the first email, a Staff Sergeant appears to seek advice from a Sergeant on how to respond to a matter. In the second email, the Detective Sergeant of the SPS responds by providing different options on how to respond to the matter. I find that the email exchange on page 71 contains advice. I will consider whether page 71 meets the second part of the two-part test.
- [88] However, pages 136 and 164 do not contain advice. On page 136, a civilian member of SPS seeks direction from a Staff Sergeant of the SPS. The Staff Sergeant provides direction. Similarly, page 164 contains an email from the Chief of Police to a Staff Sergeant where the Chief requests information regarding a matter. The Staff Sergeant provides the information. The Chief of Police is seeking information, not advice. I find that SPS did not properly apply subsection 16(1)(a) of LA FOIP to pages 136 and 164.

***2. Was the advice, proposals, recommendations, analyses and/or policy options developed by or for the local authority?***

- [89] “Developed by or for” means the advice, proposals, recommendations, analyses and/or policy options must have been created either: 1) within the local authority, or 2) outside the local authority but for the local authority (for example, by a service provider or stakeholder) (*Guide to LA FOIP*, Ch. 4, p. 108).
- [90] For information to be developed by or for a local authority, the person developing the information should be an official, officer or employee of the local authority, be contracted

to perform services, be specifically engaged in an advisory role (even if not paid), or otherwise have a sufficient connection to the local authority (*Guide to LA FOIP*, Ch. 4, p. 108).

[91] In its submission, SPS identified that the advice on page 71 was developed by a Sergeant of SPS. Based on a review, I agree that the advice was developed by a Sergeant of the SPS. The second part of the two-part test is met for the redacted information on page 71. I find that SPS properly applied subsection 16(1)(a) of LA FOIP to the redacted information on page 71.

[92] My findings and recommendations are set out in the Appendix.

#### **8. Did SPS properly apply subsection 16(1)(b) of LA FOIP?**

[93] SPS applied subsection 16(1)(b) of LA FOIP to pages 1, 5, 56, 65 to 66, 68, 103 to 104, 183 to 185, 188, 189, 191, 194 to 197, 200 to 203, 206, 208, 211 to 212, 216, 219, 222 to 223, 225, 228 to 231, 236 to 238, 241 to 242, 246 to 247, and 249 of Record 3. However, I have already found other exemptions apply to some of these pages. Therefore, I will only consider whether subsection 16(1)(b) of LA FOIP applies to pages 1, 5, 56, and 103 to 104 here.

[94] Subsection 16(1)(b) of LA FOIP provides:

**16(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 officers or employees of the local authority;

[95] My office used the following two-part test to determine if subsection 16(1)(b) of LA FOIP applies:

1. Does the record contain consultations or deliberations?

2. Do the consultations or deliberations involve officers or employees of the local authority?

*(Guide to LA FOIP, Ch. 4, pp. 113-114)*

[96] The following is an analysis to determine if the two-part test is met.

***1. Does the record contain consultations or deliberations?***

[97] In its submission, SPS asserted that the record contains “consultations”.

[98] “Consultation” means the action of consulting or taking counsel together: deliberation, conference. It is a conference in which parties consult and deliberate. A consultation can occur when the views of one or more officers or employees of a local authority are sought as to the appropriateness of a particular proposal or suggested action. It can include consultations about prospective future actions and outcomes in response to a developing situation. It can also include past courses of action. For example, where an employer is considering what to do with an employee in the future, what has been done in the past can be summarized and would qualify as part of the consultation or deliberation (*Guide to LA FOIP, Ch. 4, p. 113*).

[99] Pages 1 and 103 to 104 contains an email exchange between SPS and the PCC. SPS is seeking the views of PCC regarding a particular course of action. I find that the substance of the redacted information qualifies as a consultation as defined above. I will consider if the second part of the test is met for pages 1, 103 and 104.

[100] Page 5 is an email from the SPS to the PCC. SPS is providing PCC with information regarding a particular situation. The contents of the email do not qualify as a consultation as defined above. I find that SPS did not properly apply subsection 16(1)(b) of LA FOIP to page 5.

[101] Page 56 contains an email from the Chief. The Chief is providing direction to his staff. The contents of the email do not qualify as defined above. I find that SPS did not properly apply subsection 16(1)(b) of LA FOIP to page 56.

**2. Do the consultations or deliberations involve officers or employees of the local authority?**

[102] I am only considering whether pages 1, 103 and 104 meets the second part of the two-part test.

[103] “Involving” means including. There is nothing in the exemption that limits the exemption to participation only of officers or employees of a local authority. Collaboration with others is consistent with the concept of consultation (*Guide to LA FOIP*, Ch. 4, p. 114).

[104] “Officers or employees of a local authority” means an individual employed by a local authority and includes an individual retained under a contract to perform services for the local authority (*Guide to LA FOIP*, Ch. 4, p. 114).

[105] Based on a review, pages 1, 103 and 104 involve employees of the SPS. As such, I find that the second part of the test is met. I find that SPS properly applied subsection 16(1)(b) of LA FOIP to pages 1, 103 and 104.

[106] My findings and recommendations are set out in the Appendix.

**9. Did SPS properly apply subsection 13(1)(b) of LA FOIP?**

[107] SPS applied subsection 13(1)(b) of LA FOIP to pages 17 to 20, 25 to 27, 33, 75 to 76, 81 to 82, 85 to 87, 92 to 103, 107, 141, 158, 219, and 220 of Record 3. However, I have already found that other exemptions apply to some of these pages. Therefore, I will only consider pages 25 to 27, 81 to 82, 85 to 87, 92 to 96, 107, and 141 of Record 3 here.

[108] Subsection 13(1)(b) of LA FOIP provides:

**13(1)** A head shall refuse to give access to information contained in a record that was obtained in confidence, implicitly or explicitly, from:

...

(b) the Government of Saskatchewan or a government institution;

unless the government or institution from which the information was obtained consents to the disclosure or makes the information public.

[109] My office uses the following three-part test to determine if subsection 13(1)(b) of LA FOIP applies:

1. Was the information obtained from the Government of Saskatchewan or its agencies, Crown corporations or other institutions?
2. Was the information obtained implicitly or explicitly in confidence?
3. Is there consent to disclose the information or has the information been made public?

(*Guide to LA FOIP*, Ch. 4, at pp. 22 to 25)

[110] The following is an analysis to determine if the three-part test is met.

***1. Was the information obtained from the Government of Saskatchewan or its agencies, Crown corporations or other institutions?***

[111] “Obtained” means to acquire in any way; to get possession of; to procure; or to get a hold of by effort. A local authority may obtain information either directly or indirectly from a government institution, but to obtain it implies that the local authority did not create the information (*Guide to LA FOIP*, Ch. 4, at p. 22).

[112] Pages 25 to 27, 81 to 82, 85 to 87, 92 to 96, 107, and 141 of Record 3 contains emails from the PCC. PCC qualifies as a government institution pursuant to subsections 2(d) of LA FOIP and 2(1)(d)(ii) of *The Freedom of Information and Protection of Privacy Act* (FOIP) and subsection 3(a) and Part I of the Appendix of *The Freedom of Information and Protection of Privacy Regulations*. Therefore, the first part of the test is met.

*2. Was the information obtained implicitly or explicitly in confidence?*

[113] “In confidence” usually describes a situation of mutual trust in which private matters are relayed or reported. Information obtained in confidence means that the provider of the information has stipulated how the information can be disseminated. In order for confidence to be found, there must be an implicit or explicit agreement or understanding of confidentiality on the part of both the local authority and the party that provided the information.

[114] In its submission, SPS asserted that its Professional Standards Division is to communicate with the PCC regarding complaints against members of the SPS and that the communication between SPS and PCC are inherently confidential. It said:

**The information obtained from the PCC was obtained implicitly in confidence. One of the duties of the Staff Sergeant of the Professional Standards Division is to communicate with the PCC regarding complaints against members of the SPS, and the communication between the two parties is inherently confidential.** In *Government of Saskatchewan (Ministry of Health) v. Alan West*, the Court of Appeal found that:

[27] Moreover, the term “in confidence”, as modified by “explicitly or implicitly”, does not limit the nature of the confidences that could arise to simply written confidentiality agreements and statutory obligations. The breadth of the term allows for confidences to arise from the context in which information is obtained or form a course of conduct or dealings. For example, without being exhaustive, the following factors could be indicative of whether information has been “obtained in confidence”:

- (a) the nature of the information itself, i.e., some information obtained from other governments will be inherently confidential;
- (b) the communication of the information on the express basis that it is confidential and to be kept confidential;
- (c) the receipt of the information under an explicit acknowledgement that it is confidential and will be kept confidential;
- (d) the consistent treatment of the information by the relevant government in a manner that indicated it is confidential; or



(e) the context in which the information was created, i.e., whether it was created for a confidential purpose or for a purpose that would not preclude disclosure.

[Emphasis added]

[115] While SPS asserted that its Professional Standards Division is to obtain information from PCC regarding complaints against SPS members and such communication is confidential, I note that the information on pages 25 to 27, 81 to 82, 85 to 87, 92 to 96, 107, and 141 to which SPS applied subsection 13(1)(b) of LA FOIP are not about complaints against a specific SPS member. They are about the Applicant. SPS acknowledges this in its submission, but says that the correspondence between SPS and PCC is to remain confidential:

**The correspondence between the SPS and the PCC were done in an effort to determine what action should be taken in regards to the Applicant. The SPS submits that there is an understanding between police and the PCC that correspondence between the parties is to remain confidential,** and disclosure of the information would impact the ability of the SPS and the PCC to carry out decision-making processes in the future, and may make consultations and deliberations between the two parties less candid.

[Emphasis added]

[116] I disagree with SPS that all correspondence between it and PCC is to remain confidential. Not all correspondence between SPS and PCC can be considered confidential. Since SPS is subject to LA FOIP and PCC is subject to FOIP, neither parties can guarantee confidentiality. In my office's [Review Report 244-2019](#), I said:

[31] I also acknowledge confidentiality statements in the MOU and the Amending Agreements. However, government institutions cannot be relieved of their responsibilities under FOIP merely by agreeing via a confidentiality clause in a contract/agreement to keep matters confidential. **A government institution cannot guarantee confidentiality if FOIP mandates disclosure.**

[Emphasis added]

[117] In [West v Saskatchewan \(Health\)](#), 2020 SKQB 244 (CanLII), the Court of King's Bench agreed:

[31] I agree with these statements. The prospect of reasonable expectation of harm resulting from disclosure is not assumed, but must be established by the government claiming the exemption. **With respect to the question of confidentiality, the executive cannot contract out of the law. Confidentiality statements may, however, be evidence that the information was obtained in confidence.**

[Emphasis added]

[118] Page 24 of my office's *Guide to LA FOIP* provides a non-exhaustive list of factors to consider in determining whether information was obtained in confidence implicitly. A mutual understanding of confidentiality between the parties alone is not enough to establish that the information was obtained in confidence. Additional factors must exist:

- What is the nature of the information? Would a reasonable person regard it as confidential? Would it ordinarily be kept confidential by the local authority or the party that provided the information?
- Was the information treated consistently in a manner that indicated a concern for its protection by the local authority and the party that provided the information from the point it was obtained until the present time?
- Is the information available from sources to which the public has access?
- Does the local authority have any internal policies or procedures that speak to how records such as the one in question are to be handled confidentially?
- Was there a mutual understanding that the information would be held in confidence? Mutual understanding means that the local authority and the party that provided the information both had the same understanding regarding the confidentiality of the information at the time it was provided. If one party intends the information to be kept confidential but the other does not, the information is not considered to have been obtained in confidence. However, **mutual understanding alone is not sufficient. Additional factors must exist.**

[Emphasis added]

[119] As I have already said, the information redacted by SPS pursuant to subsection 13(1)(b) of LA FOIP on pages 25 to 27, 81 to 82, 85 to 87, 92 to 96, 107, and 141 of Record 3 do not appear to be regarding any PCC investigation or about complaints regarding any specific SPS member. The redacted information describes interactions PCC had with the Applicant. Since the interactions involve the Applicant, then the Applicant would already be aware of

the information. Earlier in this Report, I discussed the absurd result principle. It would be an absurd result to withhold information that is clearly within the Applicant's knowledge. Therefore, I find that SPS could not have obtained the information in confidence. I find that SPS has not properly applied subsection 13(1)(b) of LA FOIP to pages 25 to 27, 81 to 82, 85 to 87, 92 to 96, 107, and 141 of Record 3.

[120] My findings and recommendations are set out in the Appendix.

#### **IV FINDINGS**

[121] I find that I have jurisdiction to review this matter.

[122] I find that subsection 14(1)(k) of LA FOIP does not apply to the majority of the records to which SPS applied the exemption.

[123] I find that subsection 14(1)(k) of LA FOIP applies to the body of an email with the timestamped 11:53 a.m. at page 120 of Record 3.

[124] I find that SPS properly applied subsection 14(1)(c) of LA FOIP to pages 17 to 20, 97 to 102, 33 and 158 of Record 3.

[125] I find that SPS properly applied section 20 of LA FOIP to pages 4, 10, 14 to 15, 21, 23 to 25, 28, 35, to 36, 38, 42, 46 to 47, 49, 51 to 52, 54, 56, 58, 60, 62, 80, 112, 128, 136, 252, and 255 of Record 3 and to 2:55 to 3:19 of Record 1.4.

[126] I find that it would be an absurd result to withhold information pursuant to subsection 28(1) of LA FOIP where the information was supplied by the Applicant.

[127] Where the information is about a third party individual and the information was not supplied by the Applicant, I find that SPS properly applied subsection 28(1) of LA FOIP.

[128] I find that SPS properly applied subsection 28(1) of LA FOIP to 00:04 to 00:06 and 00:19 to 00:20 of Record 1.3.

[129] I find that subsection 21(a) of LA FOIP applies to pages 44 to 45, 63 to 70, 115 to 116, 122 to 127, 170 to 172, 182 to 251, and 260 of Record 3.

[130] I find that subsection 16(1)(a) of LA FOIP does not apply to pages 136 and 164.

[131] I find that subsection 16(1)(a) of LA FOIP applies to the redacted information on page 71.

[132] I find that subsection 16(1)(b) of LA FOIP applies to page 56.

[133] I find that subsection 16(1)(b) of LA FOIP applies to pages 1, 103 and 104.

[134] I find that SPS has not properly applied subsection 13(1)(b) of LA FOIP to pages 25 to 27, 81 to 82, 85 to 87, 92 to 96, 107, and 141 of Record 3.

## **V RECOMMENDATION**

[135] I recommend that SPS follow the recommendations set out in the Appendix.

Dated at Regina, in the Province of Saskatchewan, this 11th day of April, 2023.

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

## Appendix

<b>Record #</b>	<b>Page #</b>	<b>Exemption(s) applied by SPS</b>	<b>IPC Findings</b>	<b>IPC Recommendations</b>
Record 1.1		14(1)(c) of LA FOIP	14(1)(c) of LA FOIP does not apply	Release
Record 1.2		14(1)(c) of LA FOIP	14(1)(c) of LA FOIP does not apply	Release
Record 1.3		14(1)(c); 28(1) of LA FOIP	14(1)(c) of LA FOIP does not apply  28(1) of LA FOIP applies to 00:04 to 00:06 and 00:19 to 00:20	Redact 00:04 to 00:06 and 00:19 to 00:20; release remainder.
Record 1.4		14(1)(c) of LA FOIP; 20	14(1)(c) of LA FOIP does not apply  20 of LA FOIP applies to 2:55 to 3:19.	Redact image of staff member at 2:55 to 3:19; release remainder.
Record 2	Released			
Record 3	1	14(1)(k); 16(1)(b) of LA FOIP	16(1)(b) of LA FOIP applies	Continue to withhold pursuant to subsection 16(1)(b) of LA FOIP
	2 to 3	14(1)(k) of LA FOIP	14(1)(c) of LA FOIP does not apply	Release
	4	14(1)(k); 20 of LA FOIP	14(1)(k) of LA FOIP does not apply  20 of LA FOIP applies	Continue to withhold redacted portion pursuant to subsection 20 of LA FOIP; release remainder.
	5	14(1)(k); 16(1)(b) of LA FOIP	Neither 14(1)(k) or 16(1)(b) of LA FOIP applies	Release

	6	14(1)(k); 28(1) of LA FOIP	14(1)(k) of LA FOIP does not apply  28(1) of LA FOIP applies to third party personal information	Continue to withhold third party personal information pursuant to subsection 28(1) of LA FOIP; release remainder.
	7 to 9	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	10	14(1)(k); 20 of LA FOIP	14(1)(k) of LA FOIP does not apply  20 of LA FOIP applies	Continue to withhold redacted portion pursuant to subsection 20 of LA FOIP; release remainder.
	11 to 13	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	14	14(1)(c); 14(1)(k); 20; 28(1) of LA FOIP	14(1)(c) of LA FOIP does not apply  14(1)(k) of LA FOIP does not apply  20 of LA FOIP applies  28(1) of LA FOIP applies	Continue withhold redacted portion pursuant to subsections 20 and 28(1) of LA FOIP; release remainder.
	15	14(1)(k); 20; 28(1) of LA FOIP	14(1)(k) of LA FOIP does not apply  28(1) of LA FOIP does not apply (absurd result)	Release
	16	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release

	17 to 20	13(1)(b); 14(1)(c) of LA FOIP	14(1)(c) of LA FOIP	Continue to withhold pursuant to subsection 14(1)(c) of LA FOIP
	21	14(1)(k); 20 of LA FOIP	14(1)(k) of LA FOIP does not apply  20 of LA FOIP applies	Continue withhold redaction portion pursuant to section 20 of LA FOIP; release remainder
	22	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	23	14(1)(k); 20; 28(1) of LA FOIP	14(1)(k) of LA FOIP does not apply  20 of LA FOIP applies  28(1) of LA FOIP does not apply (absurd result)	Release
	24	14(1)(k); 20; 28(1) of LA FOIP	14(1)(k) of LA FOIP applies to sentence redacted in second paragraph of email timestamped 4:23 p.m. but no other part of the page  20 of LA FOIP applies  28(1) of LA FOIP does not apply (absurd result)	Continue to withhold sentence in second paragraph of email timestamped 4:23 p.m. pursuant to section 14(1)(k) of LA FOIP.  Continue to withhold portion redacted pursuant to section 20 of LA FOIP.  Release remainder of page.

	25	13(1)(b); 14(1)(k); 20 of LA FOIP	13(1)(b) of LA FOIP does not apply  14(1)(k) of LA FOIP does not apply  20 of LA FOIP applies	Continue to withhold portion redacted pursuant to section 20 of LA FOIP; release remainder.
	26	13(1)(b); 14(1)(k) of LA FOIP	13(1)(b) of LA FOIP does not apply  14(1)(k) of LA FOIP does not apply	Release
	27	13(1)(b); 14(1)(k) of LA FOIP	13(1)(b) of LA FOIP does not apply  14(1)(k) of LA FOIP does not apply	Release
	28	14(1)(k); 20; 28(1) of LA FOIP	28(1) of LA FOIP applies to last part of first sentence in email timestamped 9:02:17AM  20 of LA FOIP applies	Withhold portions of page redacted pursuant to subsection 28(1) and section 20 of LA FOIP; release remainder.
	29	14(1)(k); 28(1) of LA FOIP	14(1)(k) of LA FOIP does not apply  28(1) of LA FOIP applies	Withhold portion of page redacted pursuant to subsection 28(1) of LA FOIP; release remainder
	30	14(1)(c); 14(1)(k) of LA FOIP	Neither 14(1)(c) nor 14(1)(k) of LA FOIP applies	Release
	31	14(1)(c); 14(1)(k); 28(1) of LA FOIP	28(1) of LA FOIP applies	Continue to withhold portion of page redacted



			14(1)(k) of LA FOIP does not apply	pursuant to subsection 28(1) of LA FOIP; release remainder
	32	14(1)(k); 28(1) of LA FOIP	28(1) of LA FOIP applies  14(1)(k) of LA FOIP does not apply	Continue to withhold portion of page redacted pursuant to subsection 28(1) of LA FOIP; release remainder
	33	13(1)(b); 14(1)(c); 14(1)(k); 28(1) of LA FOIP	14(1)(c) of LA FOIP applies	Continue to withhold pursuant to subsection 14(1)(c) of LA FOIP; release remainder
	34	14(1)(c); 14(1)(k); 28(1) of LA FOIP	28(1) of LA FOIP applies  14(1)(k) of LA FOIP does not apply  14(1)(c) of LA FOIP does not apply	Continue withhold portions redacted pursuant to 28(1) of LA FOIP; release remainder.
	35	14(1)(k); 20; 28(1) of LA FOIP	14(1)(k) of LA FOIP does not apply  20 of LA FOIP applies  28(1) of LA FOIP does not apply (absurd result)	Continue withhold portion redacted pursuant to section 20 of LA FOIP; release remainder.
	36	14(1)(k); 20 of LA FOIP	14(1)(k) of LA FOIP does not apply  20 of LA FOIP applies	Continue withhold portion redacted pursuant to section 20 of LA FOIP; release remainder.
	37	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release

	38	14(1)(c); 14(1)(k); 28(1) of LA FOIP	28(1) of LA FOIP applies  14(1)(k) of LA FOIP does not apply	Continue to withhold portions redacted pursuant to subsection 28(1) of LA FOIP; release remainder.
	39	14(1)(c); 14(1)(k); 28(1) of LA FOIP	28(1) of LA FOIP applies  14(1)(k) of LA FOIP does not apply	Continue to withhold portions redacted pursuant to subsection 28(1) of LA FOIP; release remainder.
	40	14(1)(c); 14(1)(k); 28(1) of LA FOIP	28(1) of LA FOIP applies  14(1)(k) of LA FOIP does not apply	Continue to withhold portions redacted pursuant to subsection 28(1) of LA FOIP; release remainder.
	41	14(1)(k); 28(1) of LA FOIP	28(1) of LA FOIP applies to contents in subject lines of emails  28(1) of LA FOIP does not apply to redacted sentence in email timestamped 10:01am (absurd result)  14(1)(k) of LA FOIP does not apply	Continue to withhold redacted portions of subject lines in emails; release remainder.
	42	14(1)(k); 20 of LA FOIP	14(1)(k) of LA FOIP does not apply  20 of LA FOIP applies	Continue to withhold portion redacted pursuant to section 20 of LA FOIP; release remainder.
	43	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release

	44 to 45	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold pursuant to subsection 21(a) of LA FOIP.
	46 to 47	14(1)(k); 20 of LA FOIP	14(1)(k) of LA FOIP does not apply 20 of LA FOIP applies	Continue to withhold portions redacted pursuant to section 20 of LA FOIP; release remainder.
	48	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	49	14(1)(k); 20 of LA FOIP	14(1)(k) of LA FOIP does not apply 20 of LA FOIP applies	Continue to withhold portion redacted pursuant to section 20 of LA FOIP; release remainder.
	50	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	51 to 52	14(1)(k); 20 of LA FOIP	14(1)(k) of LA FOIP does not apply 20 of LA FOIP applies	Continue to withhold portions redacted pursuant to section 20 of LA FOIP; release remainder.
	53	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	54	14(1)(k); 20 of LA FOIP	14(1)(k) of LA FOIP does not apply 20 of LA FOIP applies	Continue to withhold portion redacted pursuant to section 20 of LA FOIP; release remainder.
	55	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	56	14(1)(k); 16(1)(b); 20 of LA FOIP	14(1)(k) of LA FOIP does not apply 16(1)(b) of LA FOIP does not apply	Continue to withhold portions redacted pursuant to section 20 of LA FOIP; release remainder.

			20 of LA FOIP applies	
	57	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	
	58	14(1)(k); 20; 28(1) of LA FOIP	14(1)(k) of LA FOIP does not apply  20 of LA FOIP applies  28(1) of LA FOIP does not apply (absurd result)	Continue to withhold portion redacted pursuant to section 20 of LA FOIP; release remainder.
	59	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	60	14(1)(k); 20 of LA FOIP	14(1)(k) of LA FOIP does not apply  20 of LA FOIP applies	Continue to withhold portion redacted pursuant to section 20 of LA FOIP; release remainder.
	61	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	62	14(1)(k); 20 of LA FOIP	14(1)(k) of LA FOIP does not apply  20 of LA FOIP applies	Continue to withhold portion redacted pursuant to section 20 of LA FOIP; release remainder.
	63 to 64	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold pursuant to subsection 21(a) of LA FOIP.
	65 to 66	14(1)(k); 16(1)(b); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold pursuant to subsection 21(a) of LA FOIP.
	67	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold pursuant to subsection 21(a) of LA FOIP.

	68	14(1)(k); 16(1)(b); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold pursuant to subsection 21(a) of LA FOIP.
	69 to 70	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold pursuant to subsection 21(a) of LA FOIP.
	71	14(1)(k); 16(1)(a); 28(1) of LA FOIP	14(1)(k) of LA FOIP does not apply  16(1)(a) of LA FOIP does not apply  28(1) of LA FOIP does not apply (absurd result)	Release
	72 to 74	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	75 to 76	13(1)(b); 14(1)(k) of LA FOIP	14(1)(k) of LA FOIP applies	Continue to withhold pursuant to subsection 14(1)(k) of LA FOIP
	77	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	78	14(1)(k); 28(1) of LA FOIP	14(1)(k) of LA FOIP does not apply  28(1) of LA FOIP does not apply (absurd result)	Release
	79	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	80	14(1)(c); 14(1)(k); 20; 28(1) of LA FOIP	14(1)(c) of LA FOIP does not apply	Continue to withhold portion redacted pursuant to section 20 of LA

			14(1)(k) of LA FOIP does not apply  20 of LA FOIP applies  28(1) of LA FOIP does not apply (absurd result)	FOIP; release remainder.
	81	13(1)(b); 14(1)(k) of LA FOIP	Neither 13(1)(b) nor 14(1)(k) of LA FOIP applies	Release
	82	13(1)(b); 14(1)(k) of LA FOIP	Neither 13(1)(b) nor 14(1)(k) of LA FOIP applies	Release
	83	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	84	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	85	13(1)(b); 14(1)(c); 14(1)(k) of LA FOIP	13(1)(b) of LA FOIP does not apply  14(1)(c) of LA FOIP does not apply  14(1)(k) of LA FOIP does not apply	Release
	86	13(1)(b); 14(1)(k) of LA FOIP	13(1)(b) of LA FOIP does not apply  14(1)(k) of LA FOIP does not apply	Release
	87	13(1)(b); 14(1)(k) of LA FOIP	13(1)(b) of LA FOIP does not apply	Release

			14(1)(k) of LA FOIP does not apply	
	88 to 89	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	90 to 91	14(1)(k); 28(1) of LA FOIP	14(1)(k) of LA FOIP does not apply  28(1) of LA FOIP does not apply (absurd result)	Release
	92	13(1)(b); 14(1)(k) of LA FOIP	13(1)(b) of LA FOIP does not apply  14(1)(k) of LA FOIP does not apply	Release
	93	13(1)(b); 14(1)(k); 28(1) of LA FOIP	13(1)(b) of LA FOIP does not apply  14(1)(k) of LA FOIP does not apply  28(1) of LA FOIP applies	Continue to withhold portions redacted pursuant to subsection 28(1) of LA FOIP; release remainder
	94 to 95	13(1)(b); 14(1)(k) of LA FOIP	13(1)(b) of LA FOIP does not apply  14(1)(k) of LA FOIP does not apply	Release
	96	13(1)(b); 14(1)(k); 28(1) of LA FOIP	13(1)(b) of LA FOIP does not apply  14(1)(k) of LA FOIP does not apply	Continue to withhold the second paragraph on the page pursuant to subsection 28(1) of LA FOIP; release remainder.

			28(1) of LA FOIP applies to second paragraph on the page	
	97	13(1)(b); 14(1)(c); 14(1)(k) of LA FOIP	14(1)(c) of LA FOIP applies	Continue to withhold pursuant to subsection 14(1)(c) of LA FOIP.
	98	13(1)(b); 14(1)(c); 14(1)(k); 28(1) of LA FOIP	14(1)(c) of LA FOIP applies	Continue to withhold pursuant to subsection 14(1)(c) of LA FOIP.
	99	13(1)(b); 14(1)(c); 14(1)(k) of LA FOIP	14(1)(c) of LA FOIP applies	Continue to withhold pursuant to subsection 14(1)(c) of LA FOIP.
	100	13(1)(b); 14(1)(c); 14(1)(k); 28(1) of LA FOIP	14(1)(c) of LA FOIP applies	Continue to withhold pursuant to subsection 14(1)(c) of LA FOIP.
	101 to 102	13(1)(b); 14(1)(c); 14(1)(k) of LA FOIP	14(1)(c) of LA FOIP applies	Continue to withhold pursuant to subsection 14(1)(c) of LA FOIP.
	103	13(1)(b); 14(1)(c); 14(1)(k); 16(1)(b); 28(1) of LA FOIP	16(1)(b) of LA FOIP applies	Continue to withhold pursuant to subsection 16(1)(b) of LA FOIP.
	104	14(1)(k); 16(1)(b) of LA FOIP	16(1)(b) of LA FOIP applies	Continue to withhold pursuant to subsection 16(1)(b) of LA FOIP.
	105 to 106	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	107	13(1)(b); 14(1)(k) of LA FOIP	13(1)(b) of LA FOIP does not apply	Release



			14(1)(k) of LA FOIP does not apply	
	108 to 110	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	111	14(1)(k); 28(1) of LA FOIP	14(1)(k) of LA FOIP does not apply  28(1) of LA FOIP Applies to the last sentence on page. Otherwise, 28(1) of LA FOIP does not apply (absurd result)	Continue to withhold the last sentence on the page pursuant to subsection 28(1) of LA FOIP; release remainder.
	112	14(1)(k); 20 of LA FOIP	14(1)(k) of LA FOIP does not apply  20 of LA FOIP applies	Continue to withhold portion redacted pursuant to section 20 of LA FOIP; release remainder.
	113 to 114	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	115 to 116	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold.
	117 to 118	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	119	14(1)(k); 28(1) of LA FOIP	14(1)(k) of LA FOIP does not apply  28(1) of LA FOIP does not apply (absurd result)	Release
	120	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP applies to the body of the email timestamped 11:53 a.m.	

	121	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	122 to 127	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold.
	128	14(1)(k); 20; 28(1) of LA FOIP	14(1)(k) of LA FOIP does not apply  20 of LA FOIP applies  28(1) of LA FOIP does not apply (absurd result)	Continue to withhold portion redacted pursuant to section 20 of LA FOIP; release remainder.
	129 to 134	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	135	14(1)(k); 28(1) of LA FOIP	14(1)(k) of LA FOIP does not apply  28(1) of LA FOIP does not apply (absurd result)	Release
	136	14(1)(k); 16(1)(a); 20 of LA FOIP	14(1)(k) of LA FOIP does not apply  16(1)(a) of LA FOIP does not apply  20 of LA FOIP applies	Continue to withhold portion redacted pursuant to section 20 of LA FOIP; release remainder.
	137 to 140	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	141	13(1)(b); 14(1)(k) of LA FOIP	13(1)(b) of LA FOIP does not apply  14(1)(k) of LA FOIP does not apply	Release

	142 to 146	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	147	14(1)(k); 28(1) of LA FOIP	14(1)(k) of LA FOIP does not apply  28(1) of LA FOIP applies	Continue to withhold portions redacted pursuant to subsection 28(1) of LA FOIP; release remainder.
	148 to 150	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	151	14(1)(k); 28(1) of LA FOIP	14(1)(k) of LA FOIP does not apply  28(1) of LA FOIP does not apply (absurd result)	Release
	152 to 153	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	154	14(1)(k); 28(1) of LA FOIP	14(1)(k) of LA FOIP does not apply  28(1) of LA FOIP applies	Continue to withhold portion redacted pursuant to subsection 28(1) of LA FOIP; release remainder.
	155	14(1)(c); 14(1)(k) of LA FOIP	14(1)(c) of LA FOIP does not apply  14(1)(k) of LA FOIP does not apply	Release
	156	14(1)(c); 14(1)(k); 28(1) of LA FOIP	14(1)(c) of LA FOIP does not apply  14(1)(k) of LA FOIP does not apply  28(1) of LA FOIP applies	Continue to withhold portion redacted pursuant to subsection 28(1) of LA FOIP; release remainder.

	157	14(1)(k); 28(1) of LA FOIP	14(1)(k) of LA FOIP does not apply  28(1) of LA FOIP applies	Continue to withhold portion redacted pursuant to subsection 28(1) of LA FOIP; release remainder.
	158	13(1)(b); 14(1)(c); 14(1)(k); 28(1) of LA FOIP	14(1)(c) of LA FOIP applies	Continue to withhold pursuant to subsection 14(1)(c) of LA FOIP; release remainder
	159	14(1)(c); 14(1)(k); 28(1) of LA FOIP	28(1) of LA FOIP applies  14(1)(k) of LA FOIP does not apply  14(1)(c) of LA FOIP does not apply	Continue withhold portions redacted pursuant to 28(1) of LA FOIP; release remainder.
	160	14(1)(k); 28(1) of LA FOIP	14(1)(k) of LA FOIP does not apply  28(1) of LA FOIP applies	Continue withhold portions redacted pursuant to 28(1) of LA FOIP; release remainder.
	161 to 162	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	163	14(1)(c); 14(1)(k); 28(1) of LA FOIP	28(1) of LA FOIP applies	Continue withhold portions redacted pursuant to 28(1) of LA FOIP; release remainder.
	164	14(1)(c); 14(1)(k); 16(1)(a); 28(1) of LA FOIP	28(1) of LA FOIP applies	Continue withhold portions redacted pursuant to 28(1) of LA FOIP; release remainder.
	165	14(1)(c); 14(1)(k); 28(1) of LA FOIP	28(1) of LA FOIP applies	Continue withhold portions redacted pursuant to 28(1) of LA FOIP; release remainder.

	166	14(1)(c); 14(1)(k); 28(1) of LA FOIP	28(1) of LA FOIP applies	Continue withhold portions redacted pursuant to 28(1) of LA FOIP; release remainder.
	167	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	168	14(1)(k); 28(1) of LA FOIP	14(1)(k) of LA FOIP does not apply  28(1) of LA FOIP applies	Continue withhold portions redacted pursuant to 28(1) of LA FOIP; release remainder.
	169	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	170 to 172	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold.
	173	14(1)(k); 28(1) of LA FOIP	14(1)(k) of LA FOIP does not apply  28(1) of LA FOIP does not apply (absurd result)	Release
	174 to 177	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	178	14(1)(k); 28(1) of LA FOIP	14(1)(k) of LA FOIP does not apply  28(1) of LA FOIP does not apply (absurd result)	Release
	179 to 181	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	182	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold.
	183 to 185	14(1)(k); 16(1)(b); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold.

	186 to 187	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue withhold.	to
	188 to 189	14(1)(k); 16(1)(b); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue withhold.	to
	190	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue withhold.	to
	191	14(1)(k); 16(1)(b); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue withhold.	to
	192 to 193	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue withhold.	to
	194 to 197	14(1)(k); 16(1)(b); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue withhold.	to
	198 to 199	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue withhold.	to
	200 to 203	14(1)(k); 16(1)(b); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue withhold.	to
	204 to 205	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue withhold.	to
	206	14(1)(k); 16(1)(b); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue withhold.	to
	207	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue withhold.	to
	208	14(1)(k); 16(1)(b); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue withhold.	to
	209 to 210	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue withhold.	to
	211 to 212	14(1)(k); 16(1)(b); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue withhold.	to
	213 to 215	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue withhold.	to
	216	14(1)(k); 16(1)(b); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue withhold.	to
	217 to 218	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue withhold.	to
	219	13(1)(b); 14(1)(k); 16(1)(b); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue withhold.	to

	220	13(1)(b); 14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold.
	221	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold.
	222 to 223	14(1)(k); 16(1)(b); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold.
	224	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold.
	225	14(1)(k); 16(1)(b); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold.
	226 to 227	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold.
	228 to 231	14(1)(k); 16(1)(b); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold.
	232 to 235	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold.
	236 to 238	14(1)(k); 16(1)(b); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold.
	239 to 240	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold.
	241 to 242	14(1)(k); 16(1)(b); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold.
	243 to 245	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold.
	246 to 247	14(1)(k); 16(1)(b); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold.
	248	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold.
	249	14(1)(k); 16(1)(b); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold.
	250	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold.
	251	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold.
	252	14(1)(k); 20 of LA FOIP	14(1)(k) of LA FOIP does not apply	Continue to withhold portion redacted pursuant to section 20 of LA

			20 of LA FOIP applies	FOIP; release remainder.
	253 to 254	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	255	14(1)(k); 20; 28(1) of LA FOIP	14(1)(k) of LA FOIP does not apply  20 of LA FOIP applies  28(1) of LA FOIP does not apply (absurd result)	Continue to withhold portion redacted pursuant to section 20 of LA FOIP; release remainder.
	256 to 259	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
	260	14(1)(k); 21(a) of LA FOIP	21(a) of LA FOIP applies	Continue to withhold
	261	14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
Record 3-P42		14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
Record 3-P44		14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
Record 3-P46		14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
Record 3-P47		14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
Record 3-P49		14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
Record 3-P51		14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
Record 3-P52		14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release



Record 3-P54		14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
Record 3-P56		14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
Record 3-P58		14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
Record 3-P60		14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release
Record 3-P62		14(1)(k) of LA FOIP	14(1)(k) of LA FOIP does not apply	Release