



Information and Privacy
Commissioner/Ontario
Commissaire à l'information
et à la protection de la vie privée/Ontario

ORDER P-1206

Appeal P-9600034

Ministry of Consumer and Commercial Relations



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NATURE OF THE APPEAL:

The Ministry of Consumer and Commercial Relations (the Ministry) received a request for access to all its files in which the requester was named personally and named in his position as a bailiff. The requester also sought access to the Ministry's files on a numbered company which he had owned. The request was submitted under the Freedom of Information and Protection of Privacy Act (the Act).

The Ministry identified numerous responsive records and granted partial access to them. The Ministry provided the requester with an index describing all the records. The index indicated that some of the records were being withheld, either in full or in part, on the basis of the following exemptions in the Act:

- advice and recommendations - section 13(1)
- law enforcement - sections 14(1)(d) and 14(2)(a)
- invasion of privacy - section 21(1)
- solicitor-client privilege - section 19

The requester appealed the denial of access.

This office sent a Notice of Inquiry to the Ministry, the appellant and three other individuals whose interests could be affected by disclosure of some of the information in the records (the affected persons). Because the records appeared to contain the personal information of the appellant, the Notice raised the possible application of sections 49(a) and (b) of the Act. Section 49(a) gives the Ministry the discretion to refuse to disclose to the appellant his personal information when the exemptions in sections 13(1), 14 and 19 would apply. The Ministry may also refuse to disclose to the appellant his personal information if to do so would constitute an unjustified invasion of another individual's personal privacy (section 49(b)).

Representations were received from the Ministry and one of the affected persons.

The records at issue and the exemptions claimed for each are listed in Appendix "A" to this order. They fall into three general categories: complaints and supporting documentation; general documentation, including correspondence from the police, the Ministry of the Attorney General and court orders; and the Ministry investigator's file notes.

The records are numbered according to the system used by the Ministry in its index. Where an individual record consists of multiple pages and/or discrete documents some of which are duplicated in other records, I have numbered the pages individually so as to identify the duplicate pages. For example, I have broken down Record 15 into two parts: pages 15.1-15.2 and 15.3-15.4 as the latter two pages are duplicates of pages 35.40-35.41. My decision on any particular page will also apply to subsequent duplicate pages. I have also numbered the pages separately when only certain pages of a multiple page record are at issue, the balance having been previously disclosed by the Ministry. This is the case with respect to Record 70. The Ministry has disclosed the first page (page 70.1) and only a portion of the second page (page 70.2) remains at issue.

DISCUSSION:

PERSONAL INFORMATION/DISCRETION TO DENY ACCESS TO REQUESTER'S OWN INFORMATION

Under section 2(1) of the Act, "personal information" is defined, in part, to mean recorded information about an identifiable individual, including the individual's name where it appears with other personal information relating to the individual or where the disclosure of the name would reveal other personal information about the individual.

I have reviewed the records to determine if they contain personal information and, if so, to whom the personal information relates.

The Ministry submits that the records do not contain the personal information of the appellant but rather concern allegations of impropriety against him as a bailiff and not as a private citizen. In this regard, the Ministry notes that previous decisions of this office have determined that a sole proprietorship is not an "individual" for the purposes of personal information. This submission appears to be a reference to the comments made by former Commissioner Sidney B. Linden in Order 16 where he stated:

The use of the term "individual" in the Act makes it clear that the protection provided with respect to the privacy of personal information relates only to natural persons. Had the legislature intended 'identifiable individual' to include a sole proprietorship, partnership, unincorporated association or corporation, it could and would have used the appropriate language to make this clear. The types of information enumerated under subsection 2(1) of the Act as 'personal information' when read in their entirety, lend further support to my conclusion that the term 'personal information' relates only to natural persons.

However, in Order 113, the former Commissioner expanded upon this position. He stated:

It is, of course, possible that in some circumstances, information with respect to a business entity could be such that it only relates to an identifiable individual, that is, a natural person, and that information might qualify as that individual's personal information.

I believe that this is one of those cases. Many of the complaints outlined in the records detail matters outside the sphere of the appellant's business functions. There are Ministry documents indicating concerns about the potential criminal activities of the appellant in addition to the manner in which the business was operating. There are comments about the manner and style in which the appellant dealt with individuals with whom he was involved. In my view, the nature and scope of this information extends beyond that which one would consider to be solely about a business entity. Furthermore, as I indicated at the beginning of this order, the appellant's request included access to "all files in which he was named personally". In these particular circumstances, I find that all of the records contain the personal information of the appellant.

Records 20, 74.1, 74.3 and 75 contain solely the personal information of the appellant. The balance of the records also contain the personal information of several other identifiable individuals, including those who filed complaints against the appellant and the affected persons.

The records also contain references to police officers, Crown counsel and Ministry personnel. These references relate to these individuals in their employment or professional capacities and, as such, I find they do not constitute the personal information of these individuals.

Section 47(1) of the Act gives individuals a general right of access to their own personal information held by a government body. Section 49 provides a number of exceptions to this general right of access.

Under section 49(a) of the Act, the Ministry has the discretion to deny access to an individual's own personal information in instances where certain exemptions would otherwise apply to that information. This section states as follows:

A head may refuse to disclose to the individual to whom the information relates personal information,

where section 12, **13, 14**, 15, 16, 17, 18, **19**, 20 or 22 would apply to the disclosure of that personal information. (emphases added)

Accordingly, for records which contain the appellant's personal information, and for which the Ministry has claimed sections 13(1), 14(1)(d), 14(2)(a) or 19, I will consider whether these sections apply in order to determine whether the records are exempt under section 49(a). These include all of the records with the exception of Record 19.

LAW ENFORCEMENT - CONFIDENTIAL SOURCE

The Ministry claims that the following records qualify under this exemption: Records 11, 14, 23, 24, 26, 30-37, 40, 42, 45, 48-49, 51, 53, 57-59, 62-64 and 66-67. These records consist of complaints and supporting documentation outlining concerns about the appellant's activities. References to these complaints are also found in those records consisting of the investigator's file notes and other Ministry correspondence.

The "law enforcement - confidential source" exemption appears in section 14(1)(d) of the Act, which states:

A head may refuse to disclose a record where the disclosure could reasonably be expected to,

disclose the identity of a confidential source of information in respect of a law enforcement matter, or disclose information furnished only by the confidential source;

In order for a record to qualify for exemption under this section, the matter to which the record relates must first satisfy the definition of the term "law enforcement" found in section 2(1) of the

Act. This term is defined as follows:

“law enforcement” means,

- (a) policing,
- (b) investigations or inspections that lead or could lead to proceedings in a court or tribunal if a penalty or sanction could be imposed in those proceedings, and
- (c) the conduct of proceedings referred to in clause (b).

The Ministry states that the records all relate to investigations that were conducted in response to complaints to determine if there had been a violation of the Bailiffs Act. The Ministry has explained that if a violation of this legislation is confirmed, a prosecution may be commenced in the Ontario Court (Provincial Division). Contravention of the Bailiffs Act may result in a fine of not more than \$5,000. In addition, the bailiff's appointment may be revoked.

Previous orders of the Commissioner's office have determined that records such as the ones at issue in this appeal relate to the Ministry's law enforcement mandate with regard to bailiffs (Orders P-478 and P-1109). Based on these previous orders and the Ministry's submissions in this case, I find that the records for which the Ministry has claimed section 14(1)(d) relate to “law enforcement” matters within the above definition.

The Ministry submits that its regulatory function can be greatly assisted by obtaining information and co-operation from members of the general public. In order to encourage individuals to co-operate and provide information, they must feel free to make complaints or provide information without fear of reprisal or harassment. To achieve these goals, the Ministry has a policy of not disclosing to anyone other than law enforcement agencies the identity of a complainant. The Ministry states that it operates on the premise that, unless a complainant expressly permits the disclosure of his or her complaint it is treated as a confidential source of information.

With respect to the records at issue, the Ministry states that their disclosure could reasonably be expected to disclose the identity of a confidential source of information in that they contain the names of the complainants. In addition, the Ministry states that the identities of the complainants could be ascertained from the details of the complaints, even if the names and personal identifiers were removed. This would result because the appellant has had prior dealings with these individuals and the disclosure of the transaction details would lead to a reasonable expectation that the appellant could identify the individuals who provided information to the Ministry.

I accept the submissions of the Ministry and, for the most part, agree that it has properly applied the section 14(1)(d) exemption. I find that the following records in their entirety qualify for exemption under this section: Records 11, 14, 26, 34-37, 42, 45, 51, 53, 57-59, 62-64 and 66-67.

Portions of Records 30, 31, 32 and 40 also qualify for exemption under section 14(1)(d). I find that disclosure of Records 23, 24, 33, 48 and 49 could not reasonably be expected to disclose the

identity of a confidential source or disclose information furnished only by the confidential source. Therefore, the exemption does not apply to these documents.

LAW ENFORCEMENT REPORT

Section 14(2)(a) of the Act states:

A head may refuse to disclose a record,

that is a report prepared in the course of law enforcement,
inspections or investigations by an agency which has the function
of enforcing and regulating compliance with a law;

Of the records remaining at issue, the Ministry claims that Records 15, 20, 23, 24, 30, 31, 32, 33, 40, 44, 48, 52, 55, 65, 74-76, 90 and 92 constitute “law enforcement” reports so as to fall within the section 14(2)(a) exemption. Records 90 and 92 are more appropriately analysed under section 19 of the Act. I have already found that the duplicates of pages 15.3-15.4 and 74.2, being pages 35.40-35.41 and 51.3 respectively, are exempt under section 14(1)(d) as are portions of Records 30, 31, 32 and 40. Therefore, I need not consider whether this information qualifies for exemption pursuant to section 14(2)(a).

I have previously found that the records relate to the Ministry’s law enforcement mandate with regard to bailiffs.

In addition, for a record to qualify for exemption under section 14(2)(a) of the Act, the Ministry must satisfy each part of the following three-part test:

1. the record must be a report; **and**
2. the report must have been prepared in the course of law enforcement, inspections or investigations; **and**
3. the report must have been prepared by an agency which has the function of enforcing and regulating compliance with a law.

In Order 221, Commissioner Tom Wright made the following comments about part one of the test:

The word “report” is not defined in the Act. However, it is my view that in order to satisfy the first part of the test, i.e. to be a report, a record must consist of a formal statement or account of the results of the collation and consideration of information. Generally speaking, results would not include mere observations or recordings of fact.

I agree with this approach and will apply it to the records at issue in this appeal.

The Ministry states that the records may be divided into three categories. I will address each

category separately and first consider whether the records are “reports” for the purposes of section 14(2)(a).

The first category consists of those documents prepared by a sheriff of a judicial district. These are Records 15.1-15.2, 44 and 65. I accept the Ministry’s characterization of Records 15.1-15.2 and 44 as “reports”. They were prepared by the respective sheriffs in response to complaints made against the appellant. They outline the individuals interviewed by the sheriffs, some background information and the conclusions reached by the investigators. I find that Record 65 does not constitute a “report” for the purposes of section 14(2)(a) in that it merely sets out the author’s response to a query from the Ministry.

The second category are those documents prepared by Ministry staff involved in the investigation of the bailiff activities of the appellant. Records 20, 23, 24, 30, 31, 32, 40, 48, 52, 55, 74, 75 and 76 fall into this group.

Records 20, 23, 24, 30, 31, 32, 40, 48 and 52 are notes to file by the Ministry investigator. They record the details of various telephone conversations the investigator had with individuals involved in the investigation. Record 55 constitutes the investigator’s notes taken at a meeting with several individuals. Record 74.1 is a memorandum from the investigator to the Ministry Registrar related to the materials referred to in Record 74.3. I find that these documents do not constitute “reports” in that they merely include recordings of fact or information available at that time. They do not consist of a formal statement of the account of the results of the consideration or collation of the information.

However, Records 75 and 76 do constitute reports in that they set out the background information to the investigation, discuss the status, consider the results and reach a conclusion as to the next steps which must be undertaken.

The final category of documents, Record 33, was prepared by the police. It reports on the information available to the officer, which is being passed on to the Ministry for use in its investigation. It also analyses that information from the perspective of future action. I find that Record 33 constitutes a “report” for the purposes of section 14(2)(a) of the Act.

To summarize, I have found that Records 15.1-15.2, 33, 44, 75 and 76 meet the first requirement for the application of the section 14(2)(a) exemption.

I also find that these reports were prepared in the course of a law enforcement matter, the investigation of the appellant by the Ministry. Finally, these reports were prepared by either the Ministry, the sheriff’s office or the police, all of which have the function of enforcing and regulating compliance with a law. The Ministry and the sheriff’s office are responsible for enforcing compliance with the Bailiffs Act. I have described the Ministry’s responsibilities previously. The Bailiffs Act requires that, upon the request of the Ministry or upon receiving a complaint, the regional sheriff for the region in which the bailiff is appointed shall conduct an investigation and report back to the Ministry. The Ministry states that, in such circumstances, the sheriff’s office essentially acts as an agent for the Ministry. The police are responsible for enforcing compliance with the Criminal Code.

Based on the above, I find that Records 15.1-15.2, 33, 44, 75 and 76 were prepared by agencies which have the function of enforcing and regulating compliance with a law. Accordingly, they satisfy all of the requirements of section 14(2)(a) and thus qualify for exemption under this section.

SOLICITOR-CLIENT PRIVILEGE

The Ministry submits that Records 90 and 92 are exempt from disclosure pursuant to section 19 of the Act, which states:

A head may refuse to disclose a record that is subject to solicitor-client privilege or that was prepared by or for Crown counsel for use in giving legal advice or in contemplation of or for use in litigation.

I have previously found that the duplicates of pages 90.2-90.6, being pages 76.1-76.4, are exempt under section 14(2)(a) of the Act. Therefore, only page 90.1 of Record 90 remains at issue.

Section 19 consists of two branches, which provide an institution with the discretion to refuse to disclose:

1. a record that is subject to the common law solicitor-client privilege (Branch 1); and
2. a record which was prepared by or for Crown counsel for use in giving legal advice or in contemplation of or for use in litigation (Branch 2).

The Ministry submits that both records qualify for exemption under both branches.

Page 90.1 is a memorandum from Ministry counsel to the Registrar of bailiffs. It contains legal advice on the interpretation of the Bailiffs Act as it relates to the charges which had been laid against the appellant. Record 92 is a memorandum from Ministry staff to counsel in which he provides information to counsel to enable him to provide legal advice on certain issues involving the appellant.

On this basis, I find that both records were prepared by or for Crown counsel for use in giving legal advice. Accordingly, page 90.1 and Record 92 qualify for exemption under section 19 of the Act.

ADVICE AND RECOMMENDATIONS

Of the records remaining at issue, the Ministry claims that Records 70 and 74 are exempt pursuant to section 13 of the Act. I have already dealt with page 74.2 under its duplicate page 51.3, so I need only consider whether the remaining portions of that record, pages 74.1 and 74.3, qualify for exemption pursuant to section 13(1). This section states:

A head may refuse to disclose a record where the disclosure would reveal advice or recommendations of a public servant, any other person employed in the service

of an institution or a consultant retained by an institution.

It has been established in a number of previous orders that advice and recommendations for the purpose of section 13(1) must contain more than mere information. To qualify as "advice" or "recommendations", the information contained in the records must relate to a suggested course of action, which will ultimately be accepted or rejected by its recipient during the deliberative process.

Record 70 is an issue sheet dealing with a series of articles a newspaper was preparing on the appellant. That portion at issue, 70.2, is entitled "Background". The Ministry submits that it contains the advice or recommendations of the individuals who prepared the document and that to disclose it would reveal the substance of the advice given to the Minister on this issue. The Ministry also indicates that the Minister could have accepted or rejected the advice contained in the record.

In my view, the information contained in this "Background" section is precisely that. It indicates that two reporters are preparing a story, describes the focus of the story and the likely impact of the story on the Ministry's investigation of the appellant. I do not find that such information contains "advice or recommendations" or that disclosure of this information would reveal the advice or recommendations given to the Minister on this matter in the sense that accurate inferences could be drawn from it. Therefore, I find that Record 70.2 does not qualify for exemption under section 13(1) of the Act.

As I have previously described it, Record 74.1 is a memorandum from the investigator to the Registrar of the Bailiffs Act related to the materials referred to in Record 74.3. The Ministry submits that it contains the advice or recommendations which the investigator provided to the Registrar as to how the Ministry should proceed with the matters involving the appellant. The Ministry indicates that the Registrar could have accepted or rejected the course of action proposed by the investigator. I accept the Ministry's submissions as they relate to the second paragraph on page 74.1 and find that this information qualifies for exemption under section 13(1) of the Act. However, as far as the remainder of 74.1 and page 74.3 in its entirety are concerned, I find that they contain no information which might be characterized as relating to a suggested course of action which might be accepted or rejected by the Registrar. Nor would disclosure of this information reveal such advice or recommendations.

The Ministry has not claimed that any other discretionary exemptions apply to pages 74.1 and 74.3. As previously indicated, I have found that these documents contain only the personal information of the appellant. No mandatory exemptions apply to this information. Therefore, the Ministry should disclose page 74.1 to the appellant in accordance with the highlighted version I have provided to the Freedom of Information and Privacy Co-ordinator of that office. Page 74.3 should be disclosed to the appellant in its entirety.

To summarize, I have found that Records 11, 14, 15, 26, 33-37, 42, 44, 45, 51, 53, 57-59, 62-64, 66, 67, 75, 76, 90 and 92 in their entirety and portions of Records 30, 31, 32, 40 and 74 qualify for exemption under sections 13(1), 14(1)(d), 14(2)(a) or 19 of the Act. As I have found that these records contain the personal information of the appellant, they are exempt under section 49(a) of the Act.

INVASION OF PRIVACY

The Ministry claims that Records 19, 20, 49 and 65 are exempt under section 49(b) of the Act. I have found that Records 23, 24, 48, 49, 52, 55, 65, and 70.2 in their entirety and portions of Records 30, 31, 32, and 40 do not qualify for exemption pursuant to any of the discretionary exemptions the Ministry has claimed. However, I have found that these records contain the personal information of both the appellant and other identifiable individuals. Accordingly, I will also consider whether their disclosure would result in an unjustified invasion of the personal privacy of these individuals pursuant to section 49(b) of the Act which states:

A head may refuse to disclose to the individual to whom the information relates personal information,

where the disclosure would constitute an unjustified invasion of another individual's personal privacy;

Sections 21(2), (3) and (4) of the Act provide guidance in determining whether the disclosure of personal information would constitute an unjustified invasion of personal privacy. Where one of the presumptions found in section 21(3) applies to the personal information found in a record, the only way such a presumption against disclosure can be overcome is where the personal information falls under section 21(4) or where a finding is made that section 23 of the Act applies to the personal information.

If none of the presumptions contained in section 21(3) apply, the Ministry must consider the application of the factors listed in section 21(2) of the Act, as well as all other considerations that are relevant in the circumstances of the case.

The Ministry submits that the personal information was compiled and is identifiable as part of an investigation into a possible violation of law and that it describes an individual's finances, financial history or activities or creditworthiness. In this regard, it claims that the presumptions in sections 21(3)(b) and (f) respectively apply to such information. In addition, the Ministry submits that some of the personal information is highly sensitive within the meaning of section 21(2)(f) of the Act. All of these submissions support non-disclosure of the personal information of the individuals other than the appellant.

The one affected person who submitted representations states that the information was "... part of a law enforcement activity". The appellant has provided no submissions.

Having reviewed the records and considered the submissions of the Ministry, I find that disclosure of some of the personal information of the individuals other than the appellant would fall within the presumptions in sections 21(3)(b) and (f) of the Act. This information does not fall within section 21(4). Nor has the appellant claimed that section 23 applies. Accordingly, the presumptions have not been rebutted.

I also find that some of the personal information is highly sensitive. Therefore, disclosure of this personal information would constitute an unjustified invasion of the personal privacy of the affected parties and other individuals identified in the records. On this basis, I find that Record

19 is exempt in its entirety under section 49(b) of the Act. However, the balance of the records may be severed to disclose the remaining information to the appellant.

Accordingly, I am providing the Ministry with highlighted copies of Records 20, 23, 24, 30, 31, 32, 40, 48, 49, 52, 55, 65 and 70.2. These highlighted portions should not be disclosed.

ORDER:

1. I uphold the decision of the Ministry not to disclose Records 11, 14, 15, 19, 26, 33, 34, 35, 36, 37, 42, 44, 45, 51, 53, 57, 58, 59, 62, 63a, 63b, 64, 66, 67, 75, 76, 90 and 92 in their entirety and the highlighted portions of Records 20, 23, 24, 30, 31, 32, 40, 48, 49, 52, 55, 65, 70.2 and 74.1.
2. I order the Ministry to disclose to the appellant the non-highlighted portions of Records 20, 23, 24, 30, 31, 32, 40, 48, 49, 52, 55, 65, 70.2 and 74.1, and page 74.3 in its entirety by sending him a copy not earlier than the **July 15, 1996** and not later than **July 19, 1996**.
3. To verify compliance with the provisions of this order, I reserve the right to require the Ministry to provide me with a copy of the records disclosed in accordance with Provision 2.

Original signed by: _____
Anita Fineberg
Inquiry Officer

_____ June 14, 1996

APPENDIX "A"

INDEX OF RECORDS AT ISSUE

RECORD CATEGORY ONE:

Complaints and Supporting Documentation

RECORD NUMBER	DUPLICATES	EXEMPTIONS CLAIMED	DECISION ON DISCLOSURE
11		14(1)(d), 21(1)	Do not disclose
14.1-14.2	35.39-35.38	14(1)(d), 21(1)	Do not disclose
15.1-15.2		14(2)(a)	Do not disclose
15.3-15.4	35.40-35.41	14(2)(a)	Do not disclose
26		14(1)(d), 21(1)	Do not disclose
35.1-35.37		14(1)(d), 14(2)(a), 21(1)	Do not disclose
35.38-35.39	14.2-14.1	14(1)(d), 14(2)(a), 21(1)	Do not disclose
35.40-35.41	15.3-15.4	14(1)(d), 14(2)(a), 21(1)	Do not disclose
35.42-35.53		14(1)(d), 14(2)(a), 21(1)	Do not disclose
36		14(1)(d)	Do not disclose
37		14(1)(d)	Do not disclose
42		14(1)(d), 14(2)(a)	Do not disclose
44		14(2)(a)	Do not disclose
45.1	58.3	14(1)(d)	Do not disclose
45.2-45.15		14(1)(d)	Do not disclose
51.1-51.2		14(1)(d)	Do not disclose
51.3	74.2	14(1)(d)	Do not disclose
51.4-51.5		14(1)(d)	Do not disclose
51.6	51.7	14(1)(d)	Do not disclose
58.1-58.2		13(1), 14(1)(d), 14(2)(a), 21(1)	Do not disclose
58.3	45.1	13(1), 14(1)(d), 14(2)(a), 21(1)	Do not disclose
59		14(1)(d), 14(2)(a), 21(1)	Do not disclose

RECORD NUMBER	DUPLICATES	EXEMPTIONS CLAIMED	DECISION ON DISCLOSURE
62.1	66.2, 67.3	14(1)(d), 21(1)	Do not disclose
62.2-62.3		14(1)(d), 21(1)	Do not disclose
63b.1-63b.12		14(1)(d), 14(2)(a), 21(1)	Do not disclose
64		14(1)(d), 21(1)	Do not disclose
65		14(2)(a), 21(1)	Disclose in part
66.1		14(1)(d)	Do not disclose
66.2	62.1, 67.3	14(1)(d)	Do not disclose
66.3	67.4	14(1)(d)	Do not disclose
66.4		14(1)(d)	Do not disclose
67.1-67.2		14(1)(d), 14(2)(a)	Do not disclose
67.3	62.1, 66.2	14(1)(d), 14(2)(a)	Do not disclose
67.4	66.3	14(1)(d), 14(2)(a)	Do not disclose
74.1		13(1), 14(2)(a)	Disclose in part
74.2	51.3	13(1), 14(2)(a)	Do not disclose
74.3		13(1), 14(2)(a)	Disclose in full

RECORD CATEGORY TWO

General Documentation Including Correspondence from the Police, the Ministry of the Attorney General, Memoranda and Court Orders

RECORD NUMBER	DUPLICATES	EXEMPTIONS CLAIMED	DECISION ON RECORD
19.3-19.4		21(1)	Do not disclose
33		14(1)(d), 14(2)(a)	Do not disclose
34		14(1)(d), 21(1)	Do not disclose
53		14(1)(d)	Do not disclose
75		13(1), 14(2)(a)	Do not disclose
76.1-76.5	90.3-90.6	14(2)(a)	Do not disclose
76.6-76.7		14(2)(a)	Do not disclose

RECORD NUMBER	DUPLICATES	EXEMPTIONS CLAIMED	DECISION ON RECORD
90.1		14(2)(a), 19	Do not disclose
90.2-90.6	76.1-76.4	14(2)(a), 19	Do not disclose
90.3-90.3	76.1-76.4	14(2)(a), 19	Do not disclose
92		14(2)(a), 19	Do not disclose

RECORD CATEGORY THREE

Ministry Investigator's File Notes

RECORD NUMBER	DUPLICATES	EXEMPTIONS CLAIMED	DECISION ON RECORD
20		14(2)(a), 21(1)	Disclose in part
23		14(1)(d), 14(2)(a)	Disclose in part
24		14(1)(d), 14(2)(a)	Disclose in part
30		14(1)(d), 14(2)(a)	Disclose in part
31		14(1)(d), 14(2)(a)	Disclose in part
32		14(1)(d), 14(2)(a)	Disclose in part
40		14(1)(d), 14(2)(a)	Disclose in part
48		14(1)(d), 14(2)(a)	Disclose in part
49		14(1)(d), 21(1)	Disclose in part
52		14(2)(a)	Disclose in part
55		14(2)(a)	Disclose in part
57		14(1)(d), 14(2)(a), 21(1)	Do not disclose
63a.1-63a.3		14(1)(d), 14(2)(a), 21(1)	Do not disclose
70.2		13(1)	Disclose in part