

Information and Privacy Commissioner,
Ontario, Canada



Commissaire à l'information et à la protection de la vie privée,
Ontario, Canada

ORDER MO-3775

Appeals MA18-102 and MA18-114

Town of Wasaga Beach

May 28, 2019

Summary: The Town of Wasaga Beach received a request under the *Municipal Freedom of Information and Protection of Privacy Act* (the *Act*) for access to specific records prepared by the town's municipal law enforcement and fire department officials for a number of properties. The town issued a decision to partially disclose the responsive records, with information withheld pursuant to the personal privacy exemption at section 14(1) of the *Act*. Two affected party property owners appealed the town's decision on the basis that the records contain third party information that should not be disclosed. The adjudicator conducted a joint inquiry into whether the mandatory third party exemption at section 10(1) of the *Act* applies to the records. During the inquiry, the appellants raised the application of the discretionary law enforcement exemption at section 8(1)(i). The appellants also maintained that there was additional information to which the personal privacy exemption at section 14(1) should apply. The adjudicator finds that the section 10(1) exemption does not apply to the records, the records do not contain additional personal information that has not yet been withheld by the town, and the appeals do not meet the threshold for allowing a non-institution party to rely on a discretionary exemption. The adjudicator upholds the town's decisions and dismisses the appeals.

Statutes Considered: *Municipal Freedom of Information and Protection of Privacy Act*, R.S.O. 1990, c. M.56, as amended, sections 2(1) (definition of "personal information"), and 10(1).

Order Considered: Order P-257.

OVERVIEW:

[1] The Town of Wasaga Beach (the town) received a request under the *Municipal Freedom of Information and Protection of Privacy Act* (the *Act*) for access to the

following information:

Property standards and/or inspection reports, investigation status, compliance orders, and[/]or charges prepared by the town's municipal law enforcement and/or fire department officials, from the period of July 1, 2014 until November 15, 2018 for [several listed addresses and properties]. With regard to charges, please include any outcomes, including convictions, fines levied, or if those charges were withdrawn.

[2] Prior to issuing its decision, the town notified a number of affected parties of the request pursuant to section 21(1) of the *Act* and sought representations on disclosure of the responsive records.

[3] Two affected parties responded and made representations resisting disclosure of the records relating to them. The town subsequently issued a decision to both of the affected parties. The decision letter to one affected party advised that the town was granting full access to the responsive records. The decision letter to the second affected party advised that the town was granting partial access to the responsive records, with certain information withheld under section 14 (personal privacy) of the *Act*. The town did not release any of the information in the records while awaiting the affected parties' decisions about whether to appeal.

[4] Both of the affected parties appealed the town's decisions to this office, resulting in Appeals MA18-102 and MA18-114. The original requester (the requester) did not appeal the town's decisions.

[5] The mandatory third party information exemption at section 10(1) of the *Act* is at issue in both appeals. During the mediation stage of the appeal process, the requester gave consent to share their identity with the appellants. The mediator was unable to obtain consent from the appellants to allow the town to disclose the records to the requester.

[6] A mediated settlement could not be reached for either appeal, and both were transferred to the adjudication stage where an adjudicator conducts an inquiry under the *Act*. I decided to conduct a joint inquiry, given the overlapping facts and issues and the fact that the appellants are known to one another. I began my inquiry by inviting the appellants to provide representations for my consideration.

[7] Representations were submitted jointly on behalf of both appellants. The appellants' joint representations raised the application of the mandatory personal privacy exemption at section 14(1) of the *Act*. Accordingly, two affected parties were identified and the application of section 14(1) was added as an issue in the appeals.

[8] The appellants also raised the application of the discretionary law enforcement exemption at section 8(1)(i) of the *Act*. The issues of whether a party that is not the institution can raise a discretionary exemption not relied on by the institution and the application of the discretionary exemption at section 8(1)(i) were also added as issues

in these appeals.

[9] I then invited the town and the requester to provide representations in response to all of the issues. A separate Notice of Inquiry was sent to the two affected party individuals, inviting their representations on the possible application of the personal privacy exemption at section 14(1) of the *Act*. I provided all of the parties with a copy of the non-confidential submissions of the appellants.¹

[10] I received representations from the requester. The town and affected parties did not provide representations. The appellants' representative contacted this office and advised that he was also the representative for the two affected parties, and that the affected parties' position had been addressed in the appellants' representations.

[11] I then invited the appellants to provide submissions on whether a party that is not the institution can raise a discretionary exemption. Upon receipt of those representations, I sought and received reply representations from the town and the requester.

[12] Also during my inquiry, the town issued a revised access decision for Appeal MA18-102 in which it advised that it was now granting partial, rather than full, access to the responsive records, with certain information withheld under section 14(1) of the *Act*. Staff of this office contacted the requester who confirmed that he did not take issue with the proposed redactions.

[13] For the reasons that follow, I uphold the town's decisions to grant partial access to the responsive records, and I dismiss the appeals.

RECORDS:

[14] There are 37 records at issue in Appeal MA18-102, consisting of 200 pages in total.² The town's revised decision was to grant partial access to records 52, 53, and 55, and full access to the remaining records.

[15] There are nine records at issue in Appeal MA18-114, consisting of 22 pages in total.³ The town's decision was to grant partial access to records 39, 40, and 41, and full access to the remaining records.

¹ Some of the appellants' submissions were withheld in accordance with the confidentiality criteria set out in this office's *Code of Procedure* and *Practice Direction Number 7*.

² For a description of the records at issue in Appeal MA18-102, refer to Appendix A.

³ For a description of the records at issue in Appeal MA18-114, refer to Appendix B.

ISSUES:

- A. Does the mandatory third party exemption at section 10(1) apply to the records?
- B. Do the records contain "personal information" as defined in section 2(1) and, if so, to whom does it relate?
- C. Are the appellants entitled to claim the discretionary law enforcement exemption at section 8(1)(i) of the *Act*? If so, are the records or portions of the records exempt from disclosure pursuant to that exemption?

DISCUSSION:

Issue A: Does the mandatory third party information exemption at section 10(1) apply to the records?

[16] Section 10(1) establishes the following mandatory exemption for third party information:

A head shall refuse to disclose a record that reveals a trade secret or scientific, technical, commercial, financial or labour relations information, supplied in confidence implicitly or explicitly, if the disclosure could reasonably be expected to,

- (a) prejudice significantly the competitive position or interfere significantly with the contractual or other negotiations of a person, group of persons, or organization;
- (b) result in similar information no longer being supplied to the institution where it is in the public interest that similar information continue to be so supplied;
- (c) result in undue loss or gain to any person, group, committee or financial institution or agency; or
- (d) reveal information supplied to or the report of a conciliation officer, mediator, labour relations officer or other person appointed to resolve a labour relations dispute.

[17] Section 10(1) is designed to protect the confidential "informational assets" of businesses or other organizations that provide information to government institutions.⁴

⁴ *Boeing Co. v. Ontario (Ministry of Economic Development and Trade)*, [2005] O.J. No. 2851 (Div. Ct.), leave to appeal dismissed, Doc. M32858 (C.A.) (*Boeing Co.*).

Although one of the central purposes of the *Act* is to shed light on the operations of government, section 10(1) serves to limit disclosure of confidential information of third parties that could be exploited by a competitor in the marketplace.⁵

[18] For section 10(1) to apply, the party resisting disclosure must satisfy each part of the following three-part test:

1. the record must reveal information that is a trade secret or scientific, technical, commercial, financial or labour relations information;
2. the information must have been supplied to the institution in confidence, either implicitly or explicitly; and
3. the prospect of disclosure of the record must give rise to a reasonable expectation that one of the harms specified in paragraph (a), (b), (c), and/or (d) of section 10(1) will occur.

[19] Given that the appellants are the parties resisting disclosure, they bear the onus of establishing the three-part test. In their submissions, the appellants maintain that all three parts of the section 10(1) test are met and therefore the responsive records must not be disclosed to the requester.

[20] With respect to the first part of the test, the appellants submit that the records contain "commercial information," which has been defined in past orders as follows:

Commercial information is information that relates solely to the buying, selling or exchange of merchandise or services. This term can apply to both profit-making enterprises and non-profit organizations, and has equal application to both large and small enterprises.⁶ The fact that a record might have monetary value or potential monetary value does not necessarily mean that the record itself contains commercial information.⁷

[21] The appellants also submit that the records contain information that fits within the "trade secrets" definition, which has been interpreted as follows:

Trade secret means information including but not limited to a formula, pattern, compilation, programme, method, technique, or process or information contained or embodied in a product, device or mechanism which:

- (i) is, or may be used in a trade or business,

⁵ Orders PO-1805, PO-2018, PO-2184 and MO-1706.

⁶ Order PO-2010.

⁷ Order P-1621.

- (ii) is not generally known in that trade or business,
- (iii) has economic value from not being generally known, and
- (iv) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.⁸

[22] Specifically, the appellants maintain that the records contain descriptions of various units at their properties, including alleged building or other potential bylaw infractions, which were supplied to the town as part of its efforts related to bylaw enforcement. The appellants take the position that this information is commercial in nature because it relates to the operation of their facilities, including specific details about particular units and an indication of whether the unit is occupied or vacant. The appellants maintain that the condition and occupancy of units is proprietary information that relates to their business activities and is not otherwise available.

[23] With respect to the second part of the test (supplied in confidence), the appellants submit that they facilitated and provided access to all areas of the properties to various town officials in an effort to resolve alleged bylaw infractions. The appellants maintain that the records contain entries reflecting information they provided to town officials in confidence in an effort to resolve issues identified at their properties. The appellants note that the requester is a member of the media with whom they have a "history of negative interactions," and they therefore submit that any disclosure would "fundamentally undermine" the confidential nature of the exploratory discussions they had with town officials. The appellants also maintain that they did not intend for the information to be publicly disclosed, as it could negatively affect their competitive positions in the marketplace.

[24] With respect to the third part of the test (reasonable expectation of harm), the appellants submit that the properties described in the records are rental properties that attract long-term, lower income tenants. The appellants maintain that they provide accommodation that is not otherwise generally available in town. The appellants are concerned that they may suffer undue financial loss if information relating to the various rental units at their properties is disclosed. They predict that the loss could arise because of increased vacancy rates resulting from a loss of existing tenants and deterrence of potential future tenants.

[25] The town maintains that the first part of the test is not made out in the circumstances of these appeals, and therefore the third party exemption does not apply to the records.

[26] The requester did not provide submissions on the three-part test.

⁸ Order PO-2010.

Analysis and findings

[27] For the mandatory third party exemption to apply, the party resisting disclosure must satisfy each of the three parts of the section 10(1) test. For the reasons that follow, I find that none of the records satisfy all three parts of the test, and therefore none are exempt from disclosure under section 10(1).

[28] I begin with part two of the test. The requirement that the information at issue be "supplied" to the institution reflects the purpose in section 10(1) of protecting the informational assets of third parties.⁹ Information may qualify as "supplied" if it was directly supplied to an institution by a third party, or if its disclosure would permit the drawing of accurate inferences with respect to information supplied by a third party.¹⁰

[29] Based on my review of the records at issue in both appeals, I am satisfied that with only one exception, the information was not "supplied" to the town by a third party as required by section 10(1) of the *Act*. In most instances, the information in the records was generated or gathered by the town in the context of property inspections and municipal bylaw enforcement investigations and proceedings.¹¹ For example, the records include notes and photographs documenting the observations of municipal staff while conducting property inspections; notes documenting the actions taken by municipal staff responding to bylaw violation complaints; and violation notices that were prepared by municipal officials and sent to the appellants. The records also include information prepared by municipal officials with respect to proceedings under the *Provincial Offences Act*¹² and before the town's Property Standards Committee. Accordingly, with respect to all but one record, I find that the appellants have failed to meet part two of the three-part test under section 10(1) on the basis that the information contained in the records at issue was not "supplied" to the town.

[30] One record at issue in Appeal MA18-102 (record 69) is a letter that one of the appellants sent to the Secretary of the town's Property Standards Committee. Assuming without deciding that record 69 was supplied to the town in confidence, I find, for the following reasons, that it does not meet part one of the section 10(1) test.

[31] To satisfy part one, the appellants must show that the records reveal information that is a trade secret or scientific, technical, commercial, financial, or labour relations information. The appellants submit that the records contain commercial and proprietary information on the basis that they relate to the operations of their facilities and include specific details about particular units such as whether they are occupied or vacant.

⁹ Order MO-1706.

¹⁰ Orders PO-2020 and PO-2043.

¹¹ For example, the majority of the records were generated by municipal law enforcement officers, fire department inspectors, a town prosecutor, a town clerk, and the town Property Standards Committee.

¹² R.S.O 1990, c.P33.

[32] Based on my review of record 69, I find that it does not contain information relating to the buying, selling, or exchange of merchandise or services, nor does it contain proprietary information as submitted by the appellants. Accordingly, I find that it does not contain commercial or trade secrets information, as those terms have been interpreted by past orders of this office.¹³ I am also satisfied, and I find, that the record does not contain scientific,¹⁴ technical,¹⁵ financial,¹⁶ or labour relations information,¹⁷ as those terms have been interpreted by this office. Accordingly, I find that record 69 does not meet part one of the section 10(1) test.

[33] As all three parts of the test must be met in order for section 10(1) to apply to these records, I find that section 10(1) does not apply to any of the records at issue.

Issue B: Do the records contain “personal information” as defined in section 2(1) and, if so, to whom does it relate?

[34] The appellants suggest that if I find that section 10(1) does not apply, then I should review the town’s purported failure to explain why the mandatory personal privacy exemption in section 14(1) was not considered.

[35] In order for the personal privacy exemption to apply, the records must contain “personal information.” That term is defined in section 2(1) of the *Act*, in part, as follows:

“personal information” means recorded information about an identifiable individual, including, [...]

(b) information relating to the education or the medical, psychiatric, psychological, criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved, [...]

[36] The list of examples of personal information under section 2(1) is not exhaustive. Therefore, information that does not fall within the categories described in the *Act* may still qualify as personal information.¹⁸

[37] To qualify as personal information, the information must be about the individual in a personal capacity. This is reflected in sections 2(2.1) and (2.2), which state:

¹³ See, for example, orders PO-2010 and P-1621.

¹⁴ Order PO-2010.

¹⁵ Order PO-2010.

¹⁶ Order PO-2010.

¹⁷ Orders P-1540 and P-653.

¹⁸ Order 11.

(2.1) Personal information does not include the name, title, contact information or designation of an individual that identifies the individual in a business, professional or official capacity.

(2.2) For greater certainty, subsection (2.1) applies even if an individual carries out business, professional or official responsibilities from their dwelling and the contact information for the individual relates to that dwelling.

[38] As a general rule, information associated with an individual in a professional, official, or business capacity will not be considered to be “about” the individual.¹⁹ However, even if information relates to an individual in a professional, official, or business capacity, it may still qualify as personal information if the information reveals something of a personal nature about the individual.²⁰

[39] The town maintains that all personal information has been redacted from the records. As noted above, the requester has not appealed those redactions.

[40] The appellants maintain that the records were generated as part of the town’s efforts to investigate alleged bylaw infractions and, in doing so, town officials interacted with the two affected party individuals. The appellants submit that the records reveal the employment history of both of those individuals, as contemplated by paragraph (b) of the definition of “personal information” under section 2(1) of the *Act*.

Analysis and findings

[41] As stated above, the town maintains that all personal information has been redacted from the records that it has decided to disclose to the requester. Based on my review of the records, I agree.

[42] The information that the appellants maintain is the affected parties’ “personal information” under paragraph (b) of the definition in section 2(1) consists of their names, titles, and contact information. This information appears in records regarding property inspections and municipal bylaw enforcement activities carried out in connection with properties specified in the requester’s request. The affected parties are the owners of the businesses at those properties, and the information in the records identifies them as such. The affected parties’ information appears in the signature line of forms, the address line of letters, and in inspectors’ handwritten notes. In all instances, I am satisfied that the information in the records identifies the affected parties in a business, professional, or official capacity, as contemplated by sections 2(2.1) and 2(2.2) of the *Act*. In addition, I am satisfied that the information does not reveal anything of a personal nature about the affected parties so as to qualify as their

¹⁹ Orders P-257, P-427, P-1412, P-1621, R-980015, MO-1550-F and PO-2225.

²⁰ Orders P-1409, R-980015, PO-2225 and MO-2344.

personal information according to the definition.²¹ Accordingly, I find that the information relating to the affected parties does not constitute their “personal information” for the purposes of the *Act*.

[43] Given that the affected parties’ information is not personal information as defined in the *Act*, the mandatory personal privacy exemption cannot apply to that information. Therefore, the information relating to the affected parties is not exempt from disclosure pursuant to section 14(1) of the *Act*.

Issue C: Are the appellants entitled to claim the discretionary law enforcement exemption at section 8(1)(i) of the *Act*? If so, are the records or portions of the records exempt from disclosure pursuant to that exemption?

[44] The appellants raised the application of a discretionary exemption that was not relied on by the town in issuing its decisions. Specifically, the appellants maintain that the law enforcement exemption in section 8(1)(i) of the *Act* is relevant in these appeals. This section states:

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

endanger the security of a building or the security of a vehicle carrying items, or of a system or procedure established for the protection of items, for which protection is reasonably required

[45] This office has considered the raising of discretionary exemptions by parties that are not institutions under the *Act* in previous orders and determined that only in rare circumstances should a third party be entitled to claim a discretionary exemption.²² Therefore, I asked the appellants to provide representations on why these appeals qualify as a “rare exception to the general presumption that affected parties are not entitled to raise the possible application of... discretionary exemptions.” I then invited the town and requester to respond to the appellants’ position.

Representations

[46] In their initial submissions, the appellants explain that a number of their clients are long-term tenants of modest means who have no other affordable housing options available to them. The appellants maintain that, “in large part, [their] clients constitute a particularly vulnerable segment of society that is more sensitive to a need for safety and security during a point in their lives when they are facing other significant stresses.”

²¹ Orders P-1409, R-980015, PO-2225 and MO-2344.

²² Order PO-3512.

[47] The appellants refer me to Order MO-2986, in which Adjudicator Daphne Loukidelis found that certain drawings and plans, if disclosed, would constitute a danger to a building that housed at-risk youth. The appellants submit that the issues faced by the at-risk youth are similar to those faced by their clients.

[48] The appellants provide two bases in support of their position that the circumstances of these appeals meet the threshold of "rare occasions" in which I should permit a party that is not an institution to raise a discretionary exemption. First, they submit that there is no indication that the town considered whether disclosure of the records could endanger the security of the buildings. The appellants distinguish these appeals from that considered in Order PO-3512, in which Adjudicator Catherine Corban refused to apply a discretionary exemption in part because it was clear that the institution had considered whether it applied. In this case, the appellants submit that it does not appear the town considered that disclosing records containing written and pictorial descriptions of the properties could pose a threat to the safety and security of its occupants. The appellants state that the "psychological impact on the occupants of the buildings would be enormous and would likely drive at least some of the occupants out of the properties owing to fears about their safety."

[49] Second, the appellants maintain that Order MO-2986 supports their position that the occupants of a building can be a relevant consideration in determining whether or not the section 8(1)(i) exemption applies. Again, the appellants emphasize the lower socioeconomic status of the occupants of their properties, and maintain that disclosing the records would likely "harm the emotional wellbeing of a particularly fragile population."

[50] In response, the town differentiates the records at issue in these appeals from those considered by Adjudicator Loukidelis in Order MO-2986 on the basis that the ones at issue here do not contain drawings or plans. The town submits that the pictures associated with the property inspections do not reveal any plans, drawings, or layouts. The town also submits that there is no evidence of the alleged risk of harm beyond the merely possible or speculative.

[51] The requester submits that the appellants' suggestion that disclosing information about the properties would threaten the security of its occupants is untenable. The requester maintains that the occupants, and the public more generally, would be protected, not threatened, by public reporting on affordable housing conditions in the town. He submits that there is a strong public interest in reporting whether housing conditions meet minimum standards required for health and safety. In contrast to the appellants' position, the requester maintains that secrecy, not disclosure, will threaten the security of individuals who may be living in sub-standard housing conditions.

Analysis and finding

[52] I am not persuaded by the appellants' position that these appeals represent or reflect the requisite rare occasions that would justify allowing a non-institution party to raise a discretionary exemption that the institution itself has not relied upon.

[53] In Order P-257, former Assistant Commissioner Tom Mitchinson considered the question of when an affected party, or a person other than the institution that received the access request, may be entitled to rely on one of the discretionary exemptions in the provincial *Freedom of Information and Protection of Privacy Act*. He stated:

As a general rule, with respect to all exemptions other than sections 17(1) and 21(1),²³ it is up to the head to determine which exemptions, if any, should apply to any requested record. [...]

In my view, however, the Information and Privacy Commissioner has an inherent obligation to ensure the integrity of Ontario's access and privacy scheme. In discharging this responsibility, there may be **rare occasions** when the Commissioner decides it is necessary to consider the application of a particular section of the *Act* not raised by an institution during the course of the appeal. This could occur in a situation where it becomes **evident that disclosure of a record would affect the rights of an individual, or where the institution's actions would be clearly inconsistent with the application of a mandatory exemption provided by the Act**. It is possible that concerns such as these could be brought to the attention of the Commissioner by an affected person during the course of an appeal and, if that is the case, the Commissioner would have the duty to consider them. In my view, however, it is only in this limited context that an affected person can raise the application of an exemption which has not been claimed by the head; the affected person has no right to rely on the exemption, and the Commissioner has no obligation to consider it. [emphasis added]

[54] I agree with this reasoning and adopt it for the purpose of this appeal.

[55] In my view, the circumstances before me do not amount to one of the rare occasions contemplated by former Assistant Commissioner Mitchinson that would support the application of a discretionary exemption not relied on by the town. The appellants argue that if the mandatory exemption at section 10(1) is found not to apply, they should be able to rely on section 8(1)(i) because disclosure of the records may negatively impact their occupants and their businesses. The appellants maintain that disclosure would likely drive some of the occupants out of the properties due to fears about their safety or security. In my view, the appellants' arguments on this issue tend to suggest a concern with maintaining the occupancy rate of their buildings and protecting their business interests, rather than a concern with safety of the buildings' occupants.

[56] In representations responding to those submitted by the appellants, the town

²³ The provincial equivalents to sections 10(1) and 14(1) in *MFIPPA*.

argued that section 8(1)(i) does not apply. One of the town's reasons for this position is that the records do not contain plans or information about the layouts of the properties in question, as was the case in Order MO-2986. Another reason is that the town maintains that the harms alleged by the appellants are speculative in nature. I am satisfied that the town considered the exemption and exercised its discretion not to rely on it.

[57] Accordingly, I find that the appeals do not present circumstances that warrant my consideration of a discretionary exemption not relied on by the town. As a result, I find that the appellants cannot claim section 8(1)(i) for the records at issue in these appeals and it is not necessary for me to determine whether the exemption applies.

ORDER:

I uphold the town's access decisions and I dismiss the appeals.

Original signed by _____

May 28, 2019 _____

Jaime Cardy
Adjudicator

APPENDIX A: INDEX OF RECORDS AT ISSUE IN APPEAL MA18-202

Record #	Pages	Date	Description
1	1	19/10/17	Complaint record
2	1	13/06/17	Violation notice
3	1	16/06/16	Violation notice (modified)
4	9	06/05/15	Violation notice
5	5	24/07/14	Violation notice
52	2	16/06/15	Occurrence report
53	2	11/06/15	Occurrence report
54	1	11/07/14	Office date
55	2	undated	Information under the <i>Provincial Offences Act</i>
56	1	11/07/14	Summons to defendant
57	1	14/07/14	Affidavit of service

58	1	undated	Will say statement
58	1	24/08/14	Letter re: business licencing bylaw violations
60	1	25/09/14	Letter re: [address] business licence status
61	9	24/07/14	Property standards inspection report
62	2	01/10/14	Notice of decision
63	3	24/07/14	Property standards deficiencies
64	2	15/05/15	Property standards inspection report
65	1	16/06/16	Property standards inspection report
66	2	13/07/17	Property standards inspection sheet
67	1	04/09/14	Letter re [address]
68	11	undated	Order to comply with property standards bylaw
69	1	09/09/14	Letter re secretary of the Property Standards Committee
70	1	19/09/14	Letter pending business licence – property standards order
71	26	undated	Schedule A #1
72	3	undated	Schedule A #2
73	31	undated	Schedule A #3 a, b, c, d, e
74	26	undated	Schedule A #4 a, b, c, d
75	3	undated	Schedule A #5
76	3	undated	Schedule #6
77	14	undated	Schedule A #7 a, b
78	2	undated	Schedule A #8
79	3	undated	Schedule A #9
80	6	undated	Schedule A #10

81	14	undated	Schedule A #11, 12 a, b
82	2	undated	Schedule A #13
83	5	undated	Schedule A #14

APPENDIX B: INDEX OF RECORDS AT ISSUE IN APPEAL MA18-114

Record #	Pages	Date	Description
14	1	15/06/17	Violation notice
15	3	31/05/16	Violation notice
16	3	06/05/15	Violation notice
39	2	27/01/16	Occurrence report
40	2	23/08/14	Occurrence report
41	2	22/08/14	Occurrence report
42	2	05/05/15	Property standards inspection report
43	2	31/05/16	Property standards inspection report
44	5	15/06/17	Property standards inspection sheet (renewal)