OFFICE OF THE
INFORMATION & PRIVACY
COMMISSIONER
— for —
British Columbia

Order 04-02

MINISTRY OF ATTORNEY GENERAL

Alexander Boyd, Adjudicator
January 29, 2004

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Summary: The applicant made an access request to the Ministry for records pertaining to a child custody matter involving her daughter, now an adult. The Ministry released some records but withheld records contained in the family advocate's file. Its search for records was adequate. The Ministry is not authorized to withhold information under s. 14, but s. 22 requires the Ministry to withhold the same information.

Key Words: adequacy of search – solicitor client privilege.

Statutes Considered: *Freedom of Information and Protection of Privacy Act*, ss. 6(1), 14. *Family Relations Act*, s. 2.

Authorities Considered: B.C.: Order 00-08, [2000] B.C.I.P.C.D. No. 8; Order 01-53, [2001] B.C.I.P.C.D. No. 56; Order 02-03, [2002] B.C.I.P.C.D. No. 3. **Ont**.: Order PO-2006, [2002] O.I.P.C. No.55; Order PO-2205, [2003] O.I.P.C. No. 235.

Cases Considered: B.C.: *British Columbia (Minister of Environment, Lands & Parks) et al* v. *British Columbia (Information and Privacy Commissioner)* (1995), 16 B.C.L.R. (3d) 64 (B.C.S.C.); *Gareau* v. *Superintendent of Family and Child Services for British Columbia* (1986), 2 B.C.L.R. (2d) 268; *Dormer* v. *Thomas,* [1999] B.C.J. No. 1463; *Charlie* v. *Johnson,* [1993] B.C.J. No. 1829 (S.C. Masters); *Slavutych* v. *Baker* (1975), 55 D.L.R. (3d) 244; *Gareau and R*. v. *Ryan,* [1991] N.S.J. No. 224 (N.S.S.C., T.D.); *A.J.L.* v. *L.B.,* [2002] B.C.J. No. 526, 2002 BCSC 375. **Ont:** *Ontario (Children's Lawyer)* v. *Ontario (Information and Privacy Commissioner)*, [2003] O.J. No. 3522.

1.0 INTRODUCTION

[1] This inquiry arises out of the applicant's access request to the Ministry of Attorney General ("Ministry"), under the *Freedom of Information and Protection of Privacy Act* ("Act"), for records pertaining to her. Subsequent communications between the two parties resulted in the applicant clarifying that her request was for a copy of records related to a child custody matter relating to her daughter, who is now an adult. The applicant further clarified that six named individuals might have created relevant records.

[2] The applicant also told the Ministry that she wanted a copy of her Residential Tenancy Branch file and a file from the Corrections Branch of the Ministry.

[3] The Ministry responded by providing the applicant with a copy of responsive records from the Residential Tenancy Branch. The Ministry also told the applicant that some of the records were excepted from disclosure under the Act, while other portions were outside of the scope of her request. The Ministry responded a further time, over a year later, by providing the applicant with a copy of further records that responded to her request, including some records from the family advocate file. The Ministry told the applicant at that time that:

- it was withholding information under ss. 14 and 22 of the Act;
- it could not provide her with a copy of any family advocate file kept by an individual the applicant had identified ("the advocate"), as it did not have custody or control over it;
- it could not provide a copy of some of the requested records, as they could not be located;
- it had already provided her with a copy of the responsive records from the Residential Tenancy Branch; and
- it had been unable to locate any Corrections Branch file pertaining to the applicant.

[4] The applicant requested that this Office review the Ministry's response.

[5] As mediation was not successful in resolving all matters, a written inquiry was held under Part 5 of the Act. I have dealt with this inquiry, by making all findings of fact and law and the necessary order under s. 58, as the delegate of the Information and Privacy Commissioner under s. 49(1) of the Act.

2.0 ISSUES

[6] The following issues are to be dealt with here:

1. Did the Ministry conduct an adequate search for responsive records as required by s. 6(1) of the Act?

2. Are any responsive records that the advocate created in the custody or under the control of the Ministry for the purpose of ss. 3(1) and 4(1) of the Act?

3. Is the Ministry authorized to refuse to disclose information under s. 14 of the Act?

4. Is the Ministry required by s. 22 of the Act to deny the applicant access to third-party personal information?

[7] Under s. 57(1) of the Act, the Ministry has the burden of proving that s. 14 authorizes it to withhold information. Under s. 57(2), the applicant has the burden of establishing that the disclosure of the information withheld under s. 22 would not unreasonably invade third party personal privacy.

3.0 DISCUSSION

[8] **3.1 Procedural Matters** – I will first deal with two procedural matters. The first pertains to four records that were provided by the applicant on an *in camera* basis as part of her initial submission.

[9] At para. 1 of its reply submission, the Ministry has asked that the records be closely scrutinized to determine whether they have been appropriately submitted on an *in camera* basis. If the documents have not been appropriately submitted on an *in camera* basis, the Ministry asks that it be provided with an opportunity to submit a reply respecting the records.

[10] I have reviewed the records that were submitted on an *in camera* basis and have determined that they are not relevant in assisting me in conducting this inquiry. I have therefore not considered or relied on them in making any of my findings. There is therefore no need to provide the Ministry with an opportunity to make a submission in regards to these records.

[11] A second procedural issue relates to two further submissions that the applicant delivered after the close of submissions. This Office's written policies and procedures for inquiries, a copy of which was provided to both parties before the inquiry, do not allow further submissions other than in exceptional circumstances. After considering the nature of the two further submissions provided by the applicant, I am satisfied that they should not be considered. I have therefore not considered either of them and they have not formed any part of my findings.

[12] **3.2 Custody or Control of Records** – The first issue is whether the Ministry has custody or control of the advocate's records relating to the applicant or her daughter. The advocate was a lawyer in private practice who was retained to be a family advocate and to act as counsel for the interests and welfare of the applicant's daughter during family court custody proceedings. She was later replaced by another family advocate, employed by the Ministry, to act as counsel for the interests and welfare of the applicant's daughter.

[13] Apparently, the Ministry was initially of the opinion that the advocate had retained her records pertaining to the applicant's daughter and that the Ministry did not have custody or control over those records. This raised the issue of whether, for the purposes of ss. 3(1) and 4(1) of the Act, the Ministry has custody or control of any responsive records in the advocate's custody.

[14] In its initial submission, at para. 5.2, the Ministry says it later learned that it does, in fact, have custody of the records, since the advocate had previously sent the contents of her family advocate file to the family advocate employed by the Ministry, when that family advocate took over responsibility for the file. At para. 5.03 of its initial submission, the Ministry further says that the contents of the family advocate file contain records that were obtained or created by the original advocate.

[15] The Ministry has provided an affidavit sworn by Randy Street, a Ministry Information and Privacy Analyst. At para. 42, he deposed as follows:

> 42. … I have reviewed the Legal Services Branch child advocate file relating to the Applicant's daughter. Contained in that file are records that have been created by both Alison Burnet and Elizabeth Watson. In addition, there are copies of original correspondence signed by Ms. Watson. My review of that file led me to believe that the contents of Elizabeth Watson's file had indeed been sent to Alison Burnet, an employee of the Ministry, who then combined those records with records that she subsequently created or received into one file. All of the records in that file have been provided to the Applicant, subject to severing under the Act. …

[16] My review of the family advocate file confirms that it contains records created or obtained by the advocate. The Ministry has custody of these records and it is clear they were considered by the Ministry when responding to the applicant. There is no need for this inquiry to consider the issue of control under ss. 3(1) and 4(1), as the Ministry clearly has "custody" of the records.

[17] **3.3 Applicable Principles** – Section 6(1) of the Act places a duty on the Ministry to make every reasonable effort to assist the applicant by conducting an adequate search for records. The standards that must be met in order for a public body's search efforts to be considered reasonable have been discussed in numerous orders. See, for example, Order 02-03, [2002] B.C.I.P.C.D. No. 3. These orders have established that a public body's search efforts do not have to be perfect, but that the search must be thorough and comprehensive and be one that a fair and rational person would expect to be done or would consider to be reasonable.

[18] The Ministry has provided evidence, through Randy Street's affidavit, of its efforts to locate records responsive to the applicant's request. Street extensively outlines the Ministry's search efforts in paras. 8 through 36 of his affidavit. I have carefully considered that evidence, which I will not repeat here. I am satisfied that the Ministry's search for records responsive to the applicant's request was adequate and met the standard referred to above. The Ministry has met its s. 6(1) duty in searching for records.

[19] **3.4 Solicitor Client Privilege** – Previous orders have established that s. 14 incorporates both branches of common law solicitor-client privilege. The first branch is legal professional privilege and the second branch is litigation privilege. See, for example, Order 00-08, [2000] B.C.I.P.C.D. No. 8. The courts have confirmed this on several occasions. See, for example, *British Columbia (Minister of Environment, Lands & Parks) et al.* v. *British Columbia (Information and Privacy Commissioner)* (1995), 16 B.C.L.R. (3d) 64 (B.C.S.C.).

[20] The applicant did not make any representation as to whether the family advocate records are subject to s. 14.

[21] The Ministry relies on the first branch, legal professional privilege, to withhold information. At para. 5.17 of its initial submission, the Ministry says that information protected by legal professional privilege is always privileged. At para. 5.18 the Ministry further submits as follows:

> … In summary, a lawyer's client is entitled to have all communications made with a view to obtaining legal advice kept confidential. Whether communications are made to the lawyer himself or to the employees, and whether they deal with matters of an administrative nature such as financial means or with the actual nature of the legal problem … .

[22] The records that have been withheld under s. 14 are the contents of the Ministry's family advocate file relating to the representation of the applicant's daughter's interests and welfare. At para. 5.20 of its initial submission, the Ministry argues that the legislature clearly intended that family advocates would act in the capacity of legal counsel, representing the interests and welfare of the child.

[23] Family advocates are appointed under s. 2 of the *Family Relations Act* ("FRA"). Section 2 states:

> 2(1) The Attorney General may appoint a person who is a member in good standing of the Law Society of British Columbia to be a family advocate.
>
> (2) Despite any other Act and subject to the law of Canada, a family advocate may attend a proceeding under this Act or respecting the
>
> (a) adoption of a child,
> (b) guardianship of a child, guardianship of the person of a child or guardianship of the estate of a child,
> (c) custody of, maintenance for or access to a child,
> (d) alleged commission by a child of a Provincial or federal offence, or
> (e) *Child, Family and Community Service Act,*
>
> and may intervene at any stage in the proceeding to act as counsel for the interests and welfare of the child.

[24] The requirements of s. 2(1) of the FRA are such that only a lawyer in good standing with the Law Society of British Columbia can be appointed as a family

advocate. Section 2(2) of the FRA authorizes a family advocate to attend a proceeding in order to "act as counsel for the interests and welfare of the child" the family advocate is appointed to represent.

[25] Although appointed as counsel to act for the interests and welfare of a child, a family advocate is not considered to be the child's lawyer in the traditionally understood sense. Nor is the family advocate a representative of the Crown. This was established by Southin J. (as she then was) in *Gareau* v. *Superintendent of Family and Child Services for British Columbia* (1986), 2 B.C.L.R. (2d) 268, where she dealt with an application made under the *Rules of Court* for disclosure of a family advocate's file. At p. 271, Southin J. said the following about family advocates:

> … The advocate's duty is to "act as counsel for the interests and welfare of the child". That means that he and no one else, including the Attorney General, is to determine the course he follows …
>
> … Are the children his clients? I think not. He is appointed to act as counsel for their interests and welfare but nothing in the act warrants the conclusion that he is to take instructions from them even if they are of an age of sufficient majority to give instructions …

[26] In *Dormer* v. *Thomas*, [1999] B.C.J. No. 1463, a case not mentioned in the material before me, Martinson J. said the following about child advocates (at paras. 47-51):

> A child advocate is in fact an advocate on behalf of the child. This is the more traditional role that lawyers play. The advocate must present and attempt to advance the child's wishes.
>
> There has been a debate about which "model" is best for children. A variety of approaches have been taken by the courts. By way of example only, the Ontario Court of Appeal in *Strobridge* v. *Strobridge* (1992), 4 R.F.L. (4th) 169, interpreted the role of the Children's Lawyer in that province, and concluded that the role is that of a child advocate.
>
> The legislature in British Columbia has adopted an approach that is not the same as any of the three models, but is closest to the litigation guardian model. The *Family Relations Act* allows the Attorney General to appoint a lawyer to be a family advocate (s. 2(1)). That lawyer "may intervene at any stage in the proceeding to act as counsel for the interests and welfare of the child." (s. 2(2))
>
> It will be noted that the family advocate is not appointed by the court but by the Attorney General. Funding is made available for this purpose. The family advocate may or may not intervene in the proceedings. Nor is the family advocate a child advocate of the kind envisioned by the Ontario Court of Appeal in *Strobridge*. Southin J., as she then was, held that the children are not the family advocate's clients in *Gareau* v. *Supt. of Family and Child Services for British Columbia et al* (1986), 2 B.C.L.R. (2d) 268 at 271:
>
> > Are the children his clients? I think not. He is appointed to act as counsel

> for their interests and welfare, but nothing in the Act warrants the conclusion that he is to take instruction from them even if they are of an age of sufficient maturity to give instructions...
>
> Southin J. also pointed out (at p. 271) that once a family advocate is appointed, it is the advocate alone, and not the Attorney General, who decides the course to follow.

[27] I am aware that, under Ontario's *Freedom of Information and Protection of Privacy Act*, it has been decided that the Ontario Children's Lawyer is in a lawyer-client relationship with a child for whom the lawyer acts as litigation guardian or in a child protection matter. See Order PO-2006, [2002] O.I.P.C. No. 55, and Order PO-2205, [2003] O.I.P.C. No. 235. (An application for judicial review of Order PO-2006 was dismissed by the Ontario Divisional Court: *Ontario (Children's Lawyer)* v. *Ontario (Information and Privacy Commissioner)*, [2003] O.J. No. 3522.)

[28] For one thing, the wording of the Ontario version of s. 14 is different from our section. Further, the legislation governing the Ontario Children's Lawyer differs from the British Columbia legislation. Most important, I consider the British Columbia Court decisions mentioned above are determinative on the question of whether a lawyer and client relationship existed between the child advocate and the daughter in relation to the records in dispute here.

[29] Does the fact that a family advocate does not have a traditional solicitor-client relationship with a represented child preclude the family advocate's records from being protected by s. 14? At para. 5.36 of its initial submission, the Ministry argues that this should not be the case:

> If access is granted to the records at issue the goal of child consultation by a family advocate will be undermined. It will result in the underutilization of the family advocate in that they will not have the same level of input from the child (the person whose interests and welfare they are representing before the court). It will also impair the ability of a family advocate to make effective and useful submissions to the court regarding the welfare and interests of the child, a role that judges have consistently espoused as extremely helpful. When one considers the rationale for solicitor client privilege, one is left with the conclusion that it should apply to the files of family advocates. The Ministry submits that the lack of a formal client should not entail a finding that the records of a family advocate are not protected. While family advocates do not take instructions from a child, they are clearly beholden to the interests and welfare of the child and they still need input from the person whose interests they are representing (the child), as does any other lawyer. In that sense, family advocates perform a role very similar to legal counsel for other parties. The Ministry submits that the rationale for solicitor client privilege, namely, allowing for full and frank consultations between a lawyer and the person whose interests he or she is representing, supports a finding that the Ministry is authorized under section 14 of the Act to refuse to disclose the records at issue in this case.

[30] Citing *Gareau* and *Charlie* v. *Johnson*, [1993] B.C.J. No. 1829 (S.C., Master), the Ministry acknowledges that a child is not the client of a lawyer appointed as family

advocate and admits that there are no cases that directly support its claim that solicitor-client privilege should apply to the records in issue here. The Ministry's arguments depend heavily on its urging me to accept that, even though there is no lawyer-client relationship, the family advocate's role is such that s. 14 "should" apply, since the policies of confidentiality and frank communication underpinning solicitor-client privilege are important for the advocate's role.

[31] The Ministry seeks support from R. Manes & M. Silver, *Solicitor-Client Privilege in Canadian Law* (Toronto: Butterworths, 1993). It quotes from p. 7, where the authors say that, in cases of doubt, "privilege will probably apply". This statement appears, however, in a discussion about the history and rationale for a privilege that protects communications between lawyer and client. The same comment applies to the quote from p. 1 of this text, on which the Ministry also relies.

[32] I note that, at p. 13 of Manes and Silver, the authors state – citing the Supreme Court of Canada decision in *Slavutych* v. *Baker*, (1975), 55 D.L.R. (3d) 244 – that there

> … is no privilege accorded to communications merely because they were made in confidence. A mere breach of confidence with another person is insufficient to invoke privilege.

[33] It is also clear from that text that a solicitor-client relationship must exist for legal professional privilege to apply. See pp. 34 and 35.

[34] It may be that there is common law protection for the confidentiality of family advocate records of the kind in question here. See, for example, *Gareau* and *R.* v. *Ryan*, [1991] N.S.J. No. 224 (N.S.S.C., T.D.). It has been decided, however, that the only kinds of privilege recognized under s. 14 of the Act are the two kinds of common-law solicitor-client privilege mentioned above. See, for example, *British Columbia (Minister of Environment, Lands & Parks)*, above, and Order 00-08, at pp. 32 and 33. In light of the above British Columbia cases, regarding the relationship between the child and the family advocate, I see no reason to find s. 14 applies.

[35] The Ministry's argument that s. 14 "should" apply is, in my view, an attempt to extend s. 14 further than the Legislature intended it to go. In the absence of evidence supporting a solicitor-client relationship between the child and the family advocate in this case, I am not prepared to find that s. 14 applies to the disputed records. I find that s. 14 does not apply and therefore does not authorize the Ministry to refuse to disclose information.

[36] **3.5 Is the Information Subject to Section 22?** – The remaining issue is whether s. 22(1) requires the Ministry to refuse to disclose the same information. Section 22 requires a public body to deny access to personal information if its disclosure would result in an unreasonable invasion of a third party's personal privacy. The

Information and Privacy Commissioner has, in a number of decisions, discussed how s. 22 is to be applied. See for example, for example, Order 01-53, [2001] B.C.I.P.C.D. No. 56. I will not repeat such a discussion here, but have applied the approach in Order 01-53 and other decisions.

Presumed unreasonable invasions of personal privacy

[37] Section 22(3)(d) states:

> (3) A disclosure of personal information is presumed to be an unreasonable invasion of a third party's personal privacy if …
>
> (d) the personal information relates to employment, occupational or educational history

[38] The Ministry submits that some of the information contained in the disputed records falls under s. 22(3)(d), as it is personal information relating to the educational and employment history of third parties. It has specifically cited pp. 320-329 and 344-392 as falling under s. 22(3)(d).

[39] After reviewing the above pages, I agree. I therefore find that disclosure of these pages is presumed to be an unreasonable invasion of personal privacy of third parties under s. 22(3)(d).

Relevant circumstances

[40] Section 22(2) requires that all relevant circumstances must be considered by a public body when deciding whether release of personal information will unreasonably invade third-party personal privacy.

[41] Section 22(2) states:

> (2) In determining under subsection (1) or (3) whether a disclosure of personal information constitutes an unreasonable invasion of a third party's personal privacy, the head of a public body must consider all the relevant circumstances, including whether
>
> (a) the disclosure is desirable for the purpose of subjecting the activities of the government of British Columbia or a public body to public scrutiny,
>
> (b) the disclosure is likely to promote public health and safety or to promote the protection of the environment,
>
> (c) the personal information is relevant to a fair determination of the applicant's rights,
>
> (d) the disclosure will assist in researching or validating the claims, disputes or grievances of aboriginal people,

(e) the third party will be exposed unfairly to financial or other harm,

(f) the personal information has been supplied in confidence,

(g) the personal information is likely to be inaccurate or unreliable, and

(h) the disclosure may unfairly damage the reputation of any person referred to in the record requested by the applicant.

[42] The list of relevant circumstances contained in s. 22(2) is not exhaustive. A public body must consider any other circumstances that may be relevant when arriving at a decision as to release or to deny access to personal information under s. 22.

[43] The applicant's submission did not provide any reference as to any specific relevant circumstances that she contends are or may be relevant here. A substantial portion of her submission is a copy of records that the applicant submits indicate she and her daughter "are victims of miscarriage of justice, conspiracy and crime" (para. 3, initial submission). These records include correspondence to and from medical practitioners and court-related documents pertaining to the applicant and her daughter. These records do not assist in determining whether any relevant circumstances favour disclosure of third-party personal information to the applicant.

[44] In its submission the Ministry submits that a relevant circumstance is that there was an expectation that files kept by family advocates when acting in the interest and for the welfare of a child would be kept confidential (para. 5.50). It says another relevant circumstance is the amount of time that has passed since the custody litigation (para. 5.51, initial submission).

[45] At paragraph 5.50 of its initial submission, the Ministry states the following:

> Though such an expectation of confidentiality is not expressly referred to in section 22(2), the Ministry submits that it is a relevant factor in determining whether the disclosure of such information would be an unreasonable invasion of personal privacy.

[46] In support of its position, the Ministry refers to the comments made by Southin J. in *Gareau*, above. At p. 272, Southin J stated the following regarding ordering the production of family advocate files:

> Without going into the question of what an applicant for an order under subr. (11) must establish as to the nature and relevance of the document or documents he seeks, I think that the public interest in the confidentiality of family advocates outweighs other interests (see *D.* v. *Nat. Soc. for the Prevention of Cruelty to Children*, [1978] A.C. 171, [1971] 2 W.L.R. 201, [1977] 1 All E.R. 589 at 618 (H. L.), per Lord Edmund-Davies), at least, in the absence of any evidence that the family advocate is in possession of some document that would serve a greater public interest than in the interests as determined by him, of the children themselves, for instance, proof ministers of the Crown were lying conspirators,

> a highly unlikely event. …

[47] The Ministry further submits that, since *Gareau*, the courts have consistently upheld the confidentiality of family advocate files (initial submission, para. 5.50). The Ministry thus submits that the expectation that personal information in family advocate files would be kept confidential is a relevant circumstance that would require their being withheld under s. 22.

[48] The Ministry's position is supported by comments made by Kirkpatrick J. at paras. 10 and 11 of *A.J.L.* v. *L.B.L.,* [2002] B.C.J. No. 526, a divorce proceeding in which child custody was a central issue. After referring to Southin J's comments in *Gareau*, Kirkpatrick J stated:

> 10. In my view, the above passage from Gareau disposes of the issue. The confidentiality of the family advocate's file should be preserved.
>
> 11. Mr. L.B.L. has failed to establish in any rational manner that the family advocate is in possession of some document that would serve a greater public interest than the interests of the child, as determined by the family advocate. It is a high bar which Mr. L.B.L. has not leapt. Mr. L.B.L.'s allegations of conspiratorial conduct and bias are unfounded and require far more than his mere suspicions to displace the need to maintain the confidentiality of the family advocate's file.

[49] I am persuaded by the Ministry's argument that there is an expectation that family advocate files will generally remain confidential. I find that the expectation that family advocate files be kept confidential is a relevant circumstance that favours denying access to the disputed records under s. 22.

[50] At paragraph 5.51 of its submission the Ministry submits the following:

> The Ministry submits that the fact that approximately 20 years has passed since the custody and access litigation involving the Applicant's child was completed is a relevant factor under section 22(2). The Ministry submits that third parties should be able to lead their lives without fear that information relating to them will be disclosed to third parties years after the circumstances in question.

[51] In her reply submission, the applicant says that the 20-year timeframe is not accurate, as she was "dealing with that office in 1989, when my Daughter was apprehended".

[52] Regardless of which timeframe might be accurate, I do not support the Ministry's position. The Ministry's statement is rather broad in nature and, if accepted, could result in the denial of access to any records relating to a given custody or access litigation to a third party on the basis of the time that has passed.

[53] While I accept that there may be occasions where the passing of time may be a relevant circumstance that could cause given records to be withheld under s. 22,

I cannot accept the Ministry's interpretation. I have been provided with no such evidence as to why the age of the disputed records is of particular relevance, and thus that the passage of time is a consideration. I find that the amount of time that has passed since the disputed records were created is not a relevant circumstance in this case.

4.0 CONCLUSION

[54] As discussed above, there is no need for me to deal with whether the advocate's records are under the custody or control of the Ministry for the purposes of ss. 3(1) and 4(1).

[55] Given that I have determined that the Ministry conducted an adequate search for records, and thus that it has fulfilled its duty to assist under s. 6(1), under s. 58 of the Act I confirm that the Ministry has performed its s. 6(1) duty.

[56] I find that s. 14 does not authorize the Ministry to refuse disclosure of the disputed records and, under s. 58 of the Act, I require the Ministry to give access. However, because I have found that s. 22 requires the Ministry to refuse to disclose the same records, under s. 58 of the Act, I require the Ministry to withhold the disputed records.

January 29, 2004

ORIGINAL SIGNED BY

Alexander Boyd
Adjudicator