Protecting privacy. Promoting transparency.

Order F16-14

DISTRICT OF OAK BAY

Ross Alexander
Adjudicator

March 15, 2016

CanLII Cite: 2016 BCIPC 16
Quicklaw Cite: [2016] B.C.I.P.C.D. No. 16

Summary: An applicant requested records related to a District of Oak Bay development variance permit he was granted in 2009 regarding his residence, as well as records related to bylaw enforcement matters involving him. Oak Bay disclosed nearly all of the information in the responsive records, but it withheld the identities of neighbours who opposed the applicant's development variance application. The adjudicator determined that Oak Bay is required to refuse to disclose this information because disclosure would be an unreasonable invasion of the personal privacy of third parties under s. 22 of FIPPA.

Statutes Considered: *Freedom of Information and Protection of Privacy Act*, s. 22.

Authorities Considered: B.C.: Order F15-21, 2015 BCIPC 23 (CanLII); Order F15-37, 2015 BCIPC 40 (CanLII); Order F13-39, 2014 BCIPC 42 (CanLII).

Cases Considered: *Dunsmuir v. New Brunswick*, 2008 SCC 9 (CanLII); *British Columbia Society for the Prevention of Cruelty to Animals v. British Columbia (Farm Industry Review Board)*, 2013 BCSC 2331.

INTRODUCTION

[1] This inquiry relates to an applicant's request to the District of Oak Bay ("Oak Bay") for records regarding property he owns in Oak Bay. He specifically requested any letters, emails and petitions Oak Bay received as a result of development variance and building permits the applicant received in 2009 to renovate his home, as well as any records related to bylaw enforcement.

[2] Oak Bay disclosed some information to the applicant, but it withheld other information under s. 22 (unreasonable invasion of personal privacy) of the *Freedom of Information and Protection of Privacy Act* ("FIPPA").

[3] The applicant made a request to the Office of the Information and Privacy Commissioner ("OIPC") to review Oak Bay's decision, both in relation to denying access to information under s. 22 and to complain that there were additional records the applicant believed were responsive to his request.

[4] During the OIPC mediation process, Oak Bay disclosed additional records to the applicant. As a result, the applicant's complaint that there were additional records was resolved, and it is no longer at issue. Oak Bay also consulted with the third parties whose information is at issue to determine whether they would consent to disclosure of the remaining withheld information. The third parties did not consent to disclosure, with many of them providing explanations to Oak Bay regarding why they did not consent.

[5] Oak Bay asked the Commissioner to exercise her discretion under s. 56 of FIPPA to not hold an inquiry because it is plain and obvious that disclosure of the withheld information would be an unreasonable invasion of personal privacy under s. 22 of FIPPA. In Order F15-21[1], Adjudicator Motts concluded it was not plain and obvious that s. 22 applies, so Oak Bay's request that an inquiry not be held was denied.

[6] The applicant, Oak Bay and two third parties provided submissions in this inquiry. Further, Oak Bay included the written replies it received from a number of third parties in response to its consultation process with the third parties. There are *in camera* materials from all of the parties who provided materials in this inquiry.

ISSUE

[7] The issue in this inquiry is whether the Ministry is required to refuse to disclose the withheld information because disclosure would be an unreasonable invasion of a third party's personal privacy under s. 22 of FIPPA.

[8] The applicant has the burden to prove that the disclosure of personal information would not be an unreasonable invasion of personal privacy, pursuant to s. 57(2) of FIPPA.

[1] Order F15-21, 2015 BCIPC 23 (CanLII).

DISCUSSION

[9] **Background** - In 2009, the applicant sought to renovate his home. This proposed construction did not conform to Oak Bay's zoning bylaw, so he sought a development variance permit. The Oak Bay Council granted the development variance, and approved the issuance of a development variance permit.

[10] Three days later, Oak Bay received a letter enclosing a petition that opposed Oak Bay's decision to grant the development variance. The letter is addressed to the Mayor and Councillors, expressing concerns about the Council's decision regarding the variance. The one page petition states in part:

> PETITION TO THE COUNCIL OF THE MUNICIPALITY OF OAK BAY
>
> We, the undersigned… request [that] you reconsider the approval of [the variance that Council granted]. We feel the decision to permit Variances sets an undesirable precedent for [the street]. The expectation at the Meeting was that the principle of standing firm on Variances would be upheld. We also felt that Council should heed the views of the neighborhood, some of which were expressed by letters tabled that the meeting. This appeal is based on the desired project concept that [the street] is for single family dwellers.[2]

[11] The petition includes nine lines of signatures and other identifying information (*i.e.*, printed names and addresses). Oak Bay is withholding all of the information on these nine lines, except for the name of the street where the individuals live. All of the petitioners live on the same street as the applicant.

[12] The Council did not consider the letter or petition, or publicly discuss or disclose them, since it had already granted the applicant's development variance.[3]

[13] The applicant subsequently completed the renovations to his property, which were approved by an Oak Bay inspector with the proviso that the applicant remove the stove plug from the basement. The inspector specifically noted that suites were not permitted in Oak Bay.

[14] In 2013, Oak Bay received a complaint about a possible illegal suite in the applicant's residence. Following its investigation, Oak Bay notified the applicant that he was not permitted to operate the secondary suite. Approximately six weeks later, the applicant made his access request for records.

---

[2] This information has already been disclosed to the applicant.

[3] The related building permit had not yet been issued when Oak Bay received the petition, but Oak Bay states that the building permit was issued to the applicant within a normal timeframe.

[15] In early 2015, Oak Bay received a further complaint that the applicant's property was being advertised as an Airbnb bed-and-breakfast type rental. Oak Bay notified the applicant that it considered this to be "operating a business", which was not permitted. As a result, the applicant took down his advertisement.

[16] There has been tension between neighbours in the applicant's neighbourhood. In addition to the bylaw complaints referenced above, there is evidence of at least one other bylaw complaint in the neighbourhood[4] and a verbal confrontation involving the applicant. Further, the applicant states that he has consulted a lawyer regarding what constitutes harassment. Moreover, it appears based on the evidence that the applicant and at least one other neighbour are using surveillance cameras to record what takes place on the street.

[17] **Information in Dispute** - The information in dispute is the names, house numbers[5] and signatures from the one page petition, and similar information in the accompanying cover letter. The withheld information reveals the identities of the signatories of the petition and the author(s) of the letter.

Preliminary Matters

Should I give deference to Oak Bay's decision?

[18] Oak Bay submits that its decision to withhold information under s. 22 was made within its jurisdiction and "should not be lightly interfered with".[6] It submits that it is appropriate for me to apply the standard of review that the Supreme Court of Canada set out in *Dunsmuir v. New Brunswick* [*Dunsmuir*] for judicial reviews of administrative decision makers.[7] If the *Dunsmuir* standard applied in this case, I would give deference to Oak Bay's decision to withhold information, and only interfere if Oak Bay's decision was unreasonable.

[19] In my view, the principles in *Dunsmuir* do not apply in this case, and I disagree with Oak Bay's suggestion that I should defer to its decision to withhold information from the applicant. The Court in *Dunsmuir* explained deference in the context of the reasonableness standard, in part, as follows:

> Deference in the context of the reasonableness standard therefore implies that courts will give due consideration to the determinations of decision makers. As Mullan explains, a policy of deference "recognizes the reality that, in many instances, those working day to day in the implementation of frequently complex administrative schemes have or will develop a considerable degree of expertise

[4] This bylaw complaint is against someone other than the applicant.
[5] The street name has already been disclosed to the applicant.
[6] Decisions under FIPPA are made by the "head" of the public body. However, for simplicity, this order refers to the decision in this case as being made by "Oak Bay".
[7] *Dunsmuir v. New Brunswick*, 2008 SCC 9 (CanLII).

> or field sensitivity to the imperatives and nuances of the legislative regime":…In short, deference requires respect for the legislative choices to leave some matters in the hands of administrative decision makers, for the processes and determinations that draw on particular expertise and experiences, and for the different roles of the courts and administrative bodies within the Canadian constitutional system.[8]

[20] This is not a circumstance where deference is appropriate because Oak Bay has more expertise and experience than the OIPC about interpreting and applying FIPPA. Monitoring how FIPPA is administered to ensure that its purposes are achieved is the very expertise that the Legislature entrusted with the Commisisoner.[9]

[21] Further, FIPPA does not contain any element of deference to public bodies in applying the exceptions to the right of disclosure under FIPPA. The Commissioner's role in inquiries of this nature is to conduct an independent review of a public body's decision under FIPPA. Section 56 of FIPPA states that the Commissioner may "decide all questions of fact and law" arising in the course of the inquiry. Further, for inquiries relating to a public body's decision to give or refuse access to all of part of a record, s. 58(2) requires the Commissioner to: order the public body to give the applicant access to information; confirm the decision of the public body; require the public body to reconsider its decision; or require the public body to refuse access to information, based on whether "*the commissioner determines*" that the public body is required or authorized to refuse access to information.

[22] In this inquiry, I am required to determine whether the information in dispute must be withheld or disclosed. Part 5 of FIPPA does not require or authorize me to determine whether the public body's decision was "reasonable" in the manner that is contemplated by *Dunsmuir*.[10] Furthermore, an OIPC inquiry is a hearing *de novo* about the facts and issues at the time of inquiry, which may be materially different than at the time of the public body's decision.[11]

[23] Therefore, I will make my own determination about whether the information at issue must be withheld under s. 22 of FIPPA. I will, however, consider all relevant circumstances (including those Oak Bay considered in reaching its decision) in determining whether s. 22 applies.

---

[8] *Dunsmuir v. New Brunswick*, 2008 SCC 9 (CanLII) at para. 47, reference and citation omitted.
[9] See s. 42 of FIPPA.
[10] I note that for discretionary exceptions to disclosure under FIPPA, the factors a public body considered in deciding to withhold information is relevant for determining whether it adequately exercised its discretion to withhold the information. However, that does not apply in this case, since s. 22 is a mandatory exception to disclosure.
[11] See Order F15-37, 2015 BCIPC 40 at paras. 49 and 50; also see *British Columbia Society for the Prevention of Cruelty to Animals v. British Columbia (Farm Industry Review Board)*, 2013 BCSC 2331 for a discussion on the topic of appeals.

Disclosure harmful to personal privacy – s. 22

[24] The issue under s. 22 of FIPPA is whether the disclosure of information would unreasonably invade the personal privacy of a third party. Numerous orders have considered the analytical approach to s. 22. It is first necessary to determine if the information in dispute is "personal information" as defined by FIPPA. If so, it must be determined whether the information meets the criteria identified in s. 22(4). If s. 22(4) applies, s. 22 does not require the public body to refuse to disclose the information. If s. 22(4) does not apply, it is necessary to determine whether disclosure of the information falls within s. 22(3). If s. 22(3) applies, disclosure is presumed to be an unreasonable invasion of third party privacy. However, this presumption can be rebutted. Whether s. 22(3) applies or not, it is still necessary to consider all relevant circumstances, including those listed in s. 22(2), to determine whether disclosing the personal information would be an unreasonable invasion of a third party's personal privacy.

[25] The parties' submissions largely focus around the fact that the information at issue is part of a petition, with Oak Bay drawing my attention to the fact that the context of the informaiton now relates to intensifying neighbourhood issues. The applicant submits that s. 22 of FIPPA does not apply, in large part because the withheld information is a petition and petitions are unequivocally used for public debate. Oak Bay acknowledges that petitions are generally not intended to be kept secret. However, it submits that the circumstances have changed since the petition was created and submitted to Oak Bay, and that disclosure in this case does not assist public accountability and could have the effect of intensifying neighbourhood issues. It submits that the objectives of FIPPA must be balanced (*i.e.* making public bodies more accountable and protecting personal privacy), and that disclosure of the personal information in this case would be an unreasonable invasion of personal privacy under s. 22 of FIPPA.

[26] I will now consider and apply the specific elements of s. 22 of FIPPA.

Personal Information

[27] The term personal information under FIPPA means "recorded information about an identifiable individual other than contact information".[12] FIPPA defines contact information as:

> …information to enable an individual at a place of business to be contacted and includes the name, position name or title, business telephone number, business address, business email or business fax number of the individual;

[28] The information at issue is clearly about identifiable individuals. Further, while much of this information comprises names or addresses, it is not contact

[12] Definitions are in Schedule 1 of FIPPA.

information because – among other reasons – it is the third parties' home contact information as opposed to information to enable them to be contacted at their place of business. I therefore find that the withheld information is personal information.

Section 22(4)

[29] If any of the circumstances in s. 22(4) apply to the personal information, it cannot be withheld under s. 22. Oak Bay submits that s. 22(4) does not apply in this case. The applicant submits that s. 22(4)(d) applies because it reveals how many total households are represented in the petition, whether these households are within the area of notification for the development variance permit, and whether the neighbourhood is accepting future development permits. Section 22(4)(d) states:

> (4) A disclosure of personal information is not an unreasonable invasion of a third party's personal privacy if
>
> (d) the disclosure is for a research or statistical purpose and is in accordance with section 35,

[30] In my view, disclosure of the withheld information is not for a research or statistical purpose. Further, s. 35 provides the conditions in which a public body is authorized to disclose personal information for research or statistical purposes. It does not require the public body to disclose personal information. In this case, the conditions set out in s. 35 of FIPPA have not been met, and, in any event, Oak Bay does not seek to disclose the personal information for such purposes. I find that neither s. 22(4)(d) nor any other provision in s. 22(4) apply in this case.

Section 22(3)

[31] Section 22(3) states that the disclosure of personal information is presumed to be an unreasonable invasion of a third party's personal privacy if any of the circumstances in s. 22(3) apply.

[32] The applicant does not directly address s. 22(3), and Oak Bay submits that none of the s. 22(3) presumptions apply.

[33] Based on my review of materials for me, I find that none of the provisions in s. 22(3) apply.

Section 22(2)

[34] Section 22(2) states that all relevant circumstances, including those listed in s. 22(2), must be considered to determine whether disclosure of personal information constitutes an unreasonable invasion of a third party's personal privacy.

[35] The applicant addresses all of the factors listed in s. 22(2), submitting that they either support disclosure of the information or do not support withholding the information. In particular, he submits that s. 22(2)(f) does not apply because there was no clear expectation of confidentiality. The applicant submits that the withheld information is a petition and that petitions are unequivocally used for public debate, so disclosure would not be an unreasonable invasion of personal privacy.

[36] Oak Bay agrees that petitions – as a general rule – are not intended to be kept secret, but it states that there are exceptions and in some cases disclosure at a subsequent point in time can be considered to be an unreasonable invasion of personal privacy. Oak Bay submits that the circumstances have changed since the petition was created and submitted, and that disclosure of the petition must be considered in its present context involving bylaw enforcement issues. It submits that the withheld information is now similar to personal information that is compiled and identifiable as part of an investigation into a possible violation of a bylaw,[13] and that disclosure would now be an unreasonable invasion of the personal privacy of third parties.

[37] Most of the information from third parties is *in camera*, but the open evidence (and the tenor of the *in camera* evidence) is that disclosure would serve no purpose and may reignite negative feelings in the neighbourhood.

[38] I will specifically address s. 22(2)(a) (public scrutiny) and s. 22(2)(f) (information supplied in confidence), and then consider other factors.

Public Scrutiny - s. 22(2)(a)

[39] Section 22(2)(a) is a factor that applies if disclosure of the information at issue is desirable for the purpose of subjecting the activities of a public body to public scrutiny. The applicant submits that a petition is a document that needs to be publicly available in order to ensure government is transparent and accountable.

[13] Section 22(3)(b) states that personal information compiled and identifiable as part of an investigation into a possible violation of law is presumed to be an unreasonable invasion of a third party's personal privacy.

[40] For s. 22(2)(a) to apply, disclosure of the specific information that is at issue must be desirable for subjecting the public body to public scrutiny (as opposed to subjecting the third parties to public scrutiny). Oak Bay has already disclosed the body of the petition and covering letter, so the applicant knows what they say. Further, the evidence in this case does not suggest that the petition and letter impacted Oak Bay's decision-making process regarding the applicant's renovations in any way, so the applicant's argument that disclosure would subject Oak Bay to public scrutiny is tenuous. In my view, the materials do not support the conclusion that disclosing the identities of the third parties would somehow be desirable in order to subject Oak Bay to public scrutiny. I therefore find that s. 22(2)(a) does not weigh in favour of disclosing the withheld information.

Supplied in Confidence - s. 22(2)(f)

[41] Section 22(2)(f) is about whether the personal information has been supplied in confidence. The applicant submits that s. 22(2)(f) does not apply because there was no clear expectation of confidentiality during the canvassing of the petition. He refers to the Ministry of Technology, Innovation and Citizens' Services FOIPPA Policy and Procedures Manual, which states:

> The names of individuals signing a petition are not normally supplied in confidence. Petitions are generally considered to be public information; individuals signing a petition are publicly lending their support to a position and expect that their names may be disclosed. There may be some cases, however, in which the circumstances surrounding the collection of the signatures on a petition indicate that the individuals have signed with the understanding that their names will not be disclosed.[14]

[42] I agree with the above quote. Further, I agree with the applicant that the evidence in this case (including the *in camera* evidence) does not establish that the third parties had an expectation of confidentiality during the canvassing of the petition, as the petition signatures are on one page and would have been revealed to individuals who were subsequently given an opportunity to sign the petition.[15] Further, the letter that encloses the petition was directed to the Mayor and Councillors, and the evidence is consistent with this information being submitted as an open and public statement of the third parties' support of a position. Moreover, the petition itself is a joint document in which the third parties state their disagreement with Oak Bay's decision to grant the applicant's development permit. In other words, it is a complaint about Oak Bay's – not the applicant's – actions. It is not a private bylaw complaint against the applicant that happens to have been submitted by multiple people. Finally, the petition and

[14] Ministry of Technology, Innovation and Citizens' Services, FOIPPA Policy and Procedures Manual: http://www.cio.gov.bc.ca/cio/priv_leg/manual/sec20_29/sec22.page?
[15] See Order F13-39, 2014 BCIPC 42 (CanLII) at para. 58.

letter do not contain any statements of confidentiality. For these reasons, I find that the petition was not supplied in confidence to Oak Bay.

Other Considerations

[43] I will now address the remaining relevant circumstances.

[44] A significant portion of the applicant's submissions relate to his belief that petitions need to be publicly released for accountability and transparency purposes, and to reveal any misrepresentations or nepotism. He submits that permitting Oak Bay to withhold portions of a petition would set an undesirable precedent. Further, it is apparent the applicant is frustrated that Oak Bay is enforcing its bylaws to prevent him from having secondary accommodation in his house. His frustration is exaserbated, it appears, because the applicant says there are a significant number of other people operating secondary suites and Airbnbs in Oak Bay.[16]

[45] My understanding is that the applicant attributes his bylaw enforcement issues to Oak Bay administrative staff and his neighbours who oppose secondary accommodation. I also understand that he wants public debate on this secondary suite issue. The applicant says an elected Oak Bay official told him that Oak Bay's enforcement policy regarding suites is limited to health and safety issues, but the Mayor and Council have no jurisdiction to stop Oak Bay's bylaw enforcement action against the applicant because municipal government is split into legislative and administrative branches. Further, the applicant states he wants to know the identities of the petitioners to determine what types of properties they live in. I infer from the applicant's materials that he believes that whether the third parties have received development variances – or live adjacent to multi-family zoned properties – impacts the validity of their views. He also submits that existing families in the neighbourhood, or those considering moving into the neighbourhood, should "know whether their neighbours are amenable to updates and renovations to their homes".[17] He further submits that neighbourhood demographics are always changing, and that hiding the identities of people who support particular viewpoints is a tactic that certain community associations use in order to give the perception of having a sizable democratic movement and significant voice across the municipality.[18]

[16] For clarity, the issue of bylaw enforcement is not within my jurisdiction. Nothing in this order is intended to provide findings or opinions regarding the applicant's concerns.

[17] I note that I disagree with the applicant on this point about what the identity information reveals. The petition states that the third parties oppose the applicant's development variance permit because they want the neighbourhood to be for single family dwellings. In my view, this does not suggest that the third parties oppose updates and renovations to homes in their neighbourhood.

[18] The applicant does not suggest that the third party petitioners in this case comprise a community association, and is there nothing else in the evidence that suggests this.

[46] One of the purposes of FIPPA is to make public bodies more accountable. However, as stated above under s. 22(2)(a), in my view disclosing the identities of the third parties would not subject Oak Bay to public scrutiny in this case. The petition was sent after Oak Bay Council made its decision to issue the applicant's development variance permit. Thus, the petition clearly did not impact Oak Bay's decision, and it is not apparent to me how disclosure of the third parties' identities would make Oak Bay more accountable.

[47] I agree with the applicant that petitions are ordinarily public information that may not be withheld under s. 22. However, each case must be evaluated on its own merits, and this case presents itself as a rare exception to the general approach to this issue. I do not agree with the applicant's view that the possibility of a public body using this decision as a precedent for withholding a petition in a future case is a relevant factor weighing in favour of disclosure. As I noted, each case will be considered on its own merits.

[48] The applicant is seeking the identities of the third parties to learn information about their properties. First, it is not apparent to me how the identities of the people who opposed the applicant's development variance application in 2009 is relevant to either the applicant's rights or the general issue of secondary suites in Oak Bay. Further, this inquiry is not about whether secondary suites ought to be permitted in Oak Bay, or how many people in the applicant's neighbourhood support or oppose secondary suites. It is about whether disclosure of the withheld identity information in the petition and letter would be an unreasonable invasion of the personal privacy of third parties. In my view, revealing whether the third parties live in properties that have received development variances, or live adjacent to multi-family zoned properties, is not a factor that weighs in favour of disclosure.

[49] The totality of the circumstances up until the time of the inquiry are relevant in this case. In my view, the third parties would have expected that their names may be disclosed in 2009 when they signed and submitted the petition and enclosing letter to the Mayor and Council opposing the applicant's development variance application. This circumstance suggests that disclosure would have not been an unreasonable invasion of their personal privacy at that time. However, Oak Bay neither publicly discussed nor disclosed the petition at the time it was submitted, and the identities of the third parties have never been disclosed. The circumstances have changed since 2009, and I must consider the contextual factors as of the time of this inquiry.

[50] Based on the evidence before me, including bylaw complaints and verbal confrontations between neighbours, it is clear that there are tensions between neighbours in the applicant's neighborhood. Much of this discord appears to be related to the issue of whether secondary accommodations should be permitted. I find that disclosure of the identity information may contribute to intensifying

neighbourhood conflict or lead to verbal confrontations, and that this weighs against disclosure in this case. However, I do not give this factor significant weight because a reasonable person signing the petition would have known and accepted the possibility that his or her identity would be revealed, and that there may be neighbourhood tension or conflict arising from the petition.[19]

Section 22(1) Conclusions

[51] The withheld information in this inquiry reveals the identities of the signatories of a petition and an enclosing letter. This is clearly personal information, and neither s. 22(4) nor s. 22(3) apply to it.

[52] I have considered the factors both for and against disclosure in this case, none of which I find to be strong factors. The withheld identifying information was not supplied in confidence, which suggests that disclosure would not be an unreasonable invasion of the third parties' personal privacy in the ordinary course of events. However, this is tempered by the fact that the information was never publicly discussed or disclosed at the time, and that the circumstances have now changed. Further, the petition did not impact Oak Bay's decision-making, and, in any event, Oak Bay has already disclosed the substance of the records to the applicant. Given this, in my view disclosure of the identity information is not desirable for the purpose of subjecting Oak Bay to public scrutiny or for any similar accountability purpose.

[53] I find that disclosure of the withheld identifying information may intensify neighbourhood tensions and lead to additional verbal confrontations. This favours withholding the information. As I have noted, I have given this factor less weight than I otherwise would have because the third parties would have known at the time they signed and submitted the petition and enclosing letter that their identities could have been publicly disclosed (which could result in neighbourhood tensions or conflict). Nonetheless, in these particular circumstances it is my view that this factor is greater than any of the factors favouring a finding that disclosure would not be an unreasonable invasion of personal privacy. Further, and in any event, the applicant has not met his burden of proving that disclosure of the personal information would not be an unreasonable invasion of personal privacy.[20]

[54] In conclusion, I find that disclosure of the withheld information would be an unreasonable invasion of the personal privacy of third parties within the meaning

[19] For clarity, I note that none of the parties assert that disclosing the identities of the people who signed the petition would disclose the identity(ies) of the bylaw complainant(s). Previous order have consistently determined that disclosure of information that would reveal the identity of a bylaw complainant is an unreasonable invasion of personal privacy under s. 22. See, for example, Order F14-38, 2014 BCIPC 41 (CanLII).

[20] See 57(2) of FIPPA.

of s. 22 of FIPPA. Oak Bay is therefore required to refuse to disclose this information to the applicant.

CONCLUSION

[55] For the reasons given, under s. 58 of FIPPA, I order that Oak Bay is required to refuse to disclose the withheld information under s. 22 of FIPPA.

March 15, 2016

ORIGINAL SIGNED BY

Ross Alexander, Adjudicator

OIPC File No.: F14-57260