Government Information (Public Access) Act 2009

NOTICE OF DECISION – INTERNAL REVIEW

Applicant:	Mr Gary Ruskin
File Ref:	2022/5146
Decision-maker:	Ms Alyssa White, Acting Chief Governance Officer
Date of decision:	18 January 2023

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1.   Background

The University of Sydney ('**the University**') received your initial access application under the *Government Information (Public Access) Act 2009* ('**GIPA Act**') on 16 September 2022. Your initial application was expressed as follows:

> *We request a complete and thorough search for records maintained by the University of Sydney about Dr. Edward C. Holmes, ARC Australian Laureate Fellow and Professor. We are requesting records of correspondence specifically in relation to following research project of Professor Holmes:*
>
> *• Kristian Andersen, Andrew Rambaut, W. Ian Lipkin, Edward C. Holmes, and Robert F. Garry. The proximal origin of SARS-CoV-2. Nature Medicine 26, 450–452 (2020). doi: https://doi.org/10.1038/s41591-020-0820-9*
>
> *We request all correspondence about the above project, with the exception of correspondence of peer-reviewers and editors of the above-named scientific journals, held by The University of Sydney that reflect communications – to or from Professor Holmes – including written correspondence, emails, email attachments, CC and BCC. To facilitate an efficient search for relevant records, we provide specific keywords below:*
>
> *Kga1978@gmail.com*
> *andersen@scripps.edu*
> *a.rambaut@ed.ac.uk*
> *linfa.wang@duke-nus.edu.sg*
> *afauci@niaid.nih.gov*
> *rfgarry@tulane.edu*
> *collinsf@mail.nih.gov*
> *daszak@ecohealthalliance.org*
> *wil2001@columbia.edu*
> *shibojiang@fudan.edu.cn*
>
> *The time period covered by the request is from January 1, 2020 to December 31, 2020. Please narrow the search results to exclude any news articles, published papers, organizational newsletters or other widely available published materials.*

On 16 October 2022 the University wrote to you seeking your agreement to an extension of time to deal with your application until 15 November 2022. You replied on 19 October 2022 agreeing to the extension. On 15 November 2022 Dr Kate Cumming made her decision on behalf of the principal officer in response to your original application ('**the original decision**').

The University received your application for internal review of the original decision on 12 December 2022. Your payment was received on 13 December 2023. Accompanying your review application was a statement in support.

2.   Decision

I am authorised by the principal officer, for the purposes of section 9(3) of the GIPA Act, to make this review decision.

In accordance with section 84(1) of the GIPA Act, I have made a new decision in respect of your original application, as if the original decision had not been made.

I have decided under section 58(1)(d) to refuse to provide access to the information because there is an overriding public interest against its disclosure.

This is a reviewable decision. Please see Part 5 of this Notice for information concerning your review rights.

3. Searches for information

Under the GIPA Act, the University must conduct reasonable searches for the government information you asked for in your original application. The original decision set out the searches that were conducted in response to your original application. The University's Cyber Security unit searched the email accounts of Professor Edward C Holmes in the University's Faculties of Science, and Medicine and Health, during the period from 1 January 2020 to 31 December 2020. The following keywords were used:

- kga1978@gmail.com
- andersen@scripps.edu
- a.rambaut@ed.ac.uk
- linfa.wang@duke-nus.edu.sg
- afauci@niaid.nih.gov
- rfgarry@tulane.edu
- collinsf@mail.nih.gov
- daszak@ecohealthalliance.org
- wil2001@columbia.edu
- shibojiang@fudan.edu.cn

Once identical copies were removed, 367 relevant email chains including some with attachments were identified. Many of these chains contain duplicate emails. They are listed in the schedule of documents ('**the requested information**'). All relevant emails were from or to Professor Holmes, including emails where he was carbon copied in as a recipient.

I consider that the original searches were reasonable and that all information falling within the scope of the original application was located. Accordingly, we have not undertaken further searches for information or had the searches repeated in response to your internal review application. I have relied on the results of the original searches for the purposes of this review.

4. The public interest test

Under section 9(1) of the GIPA Act, you have a legally enforceable right to access the information sought, unless there is an overriding public interest against its disclosure.

Further, under section 5 of the GIPA Act, there is a presumption in favour of disclosing government information unless there is an overriding public interest against its disclosure.

To decide whether or not there is an overriding public interest against disclosure of the information you asked for, I applied the public interest test, which is set out in section 13 of the GIPA Act.

I applied the public interest test by:

    (a)   identifying any public interest considerations in favour of disclosure;

    (b)   identifying any relevant public interest considerations against disclosure; and

    (c)   deciding where the balance between them lies.

4.1.   Public interest considerations in favour of disclosure

Under section 12(1) of the GIPA Act, there is a general public interest in favour of disclosing government information. Section 12(2) of the GIPA Act sets out some examples of other public interest considerations in favour of disclosure. However, I am not limited to those considerations in making my decision.

In my view, the following public interest considerations in favour of disclosure are relevant:

- The general public interest in favour of disclosure of government information.

- The public interest in disclosing information that could reasonably be expected to inform the public about the operation of agencies, enhance Government accountability or contribute to positive and informed debate on issues of public importance.

- The public interest in disclosing information that facilitates public understanding of and transparency in University research.

In *Kang v University of Sydney*, in response to an access application for information substantially similar, or in part identical, to that sought by you, Senior Member Ransome noted:

> *it is accepted that there is a public interest in disclosing information that facilitates public scrutiny of and promotes transparency in university research and that this consideration should be given significant weight.[1]*

It is therefore appropriate to take this public interest consideration in favour of disclosure into account.

In the detailed letter you provided in support of your request for this internal review you proposed the following further public interest considerations in favour of disclosure:

- Disclosure should improve understanding of the events that led to the COVID-19 pandemic and governments' initial health response to it.

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[1] [2022] NSWCATAD 135 at [43]

In *Kang v University of Sydney* ('**Kang**'), in response to an access application for information substantially similar, or in part identical, to that sought by you, Senior Member Ransome noted:

> *There is no doubt that better understanding of the origins of the pandemic and the sequence of events that led to it as well as the health response is important, not only in dealing with the current pandemic, but also in reducing future risk and preparing for the next pandemic.*[2]

However the Senior Member also noted that, in relation to the information that was substantially similar, or in part identical, to that sought by you:

> she gave no weight to the consideration that disclosure could reasonably be expected to reveal possible reasons for delays in the public release of the first SARS-CoV-2 genomic sequence.

> she gave no weight to the consideration that disclosure could reasonably be expected to shed light on who was the first to publish SARS-CoV-2 sequence.

> she gave some weight to the consideration that disclosure could reasonably be expected to contribute to positive and informed debate on the likelihood of a pangolin intermediary host as being the origins of the SARS-CoV-2 pandemic.

> she gave some weight to the consideration that disclosure could reasonably be expected to contribute to positive and informed debate on the likelihood of a laboratory leak as the origins of the SARS-CoV-2 pandemic.[3]

It is appropriate to follow this guidance and to give some weight to this public interest consideration in favour of disclosure.

- Disclosure of the information could reveal or substantiate that a scientist or an agency (or a member of an agency) engaged in scientific misconduct or negligent, improper or unlawful conduct.

You supported your argument that this consideration was relevant by reference to a timeline, "The proximal origin of SARS-CoV-2".[4]

In *Newcastle City Council v Newcastle East Residents Action Group* the Appeal Panel considered the evidence required to establish that disclosure of the information could reasonably be expected to have a particular effect. It concluded that in determining whether disclosure "could reasonably be expected" to have a particular effect, the following principles should be considered:

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[2] [2022] NSWCATAD 135 at [29]

[3] [2022] NSWCATAD 135 at [32] to [40]

[4] https://usrtk.org/covid-19-origins/timeline-the-proximal-origin-of-sars-cov-2/

> *(1) a mere statement that disclosure could reasonably be expected to have a particular effect is insufficient;*
>
> *(2) there must be real and substantial grounds supporting an opinion that disclosure could reasonably be expected to have a particular effect;*
>
> *(3) prominence should be given to inferences capable of being drawn from established facts, rather than on the subjective views of witnesses.[5]*

In *Kang v University of Sydney*, in response to an access application for information substantially similar, or in part identical, to that sought by you, Senior Member Ransome noted that:

> *Where it can be established that disclosure of information could reasonably be expected to reveal misconduct or negligent or improper conduct on the part of an agency or its employee, this would be a public interest consideration in favour of disclosure which would be given substantial weight. As stated by the Appeal Panel in the Newcastle City Council case, however, there must be real and substantial grounds supporting an opinion that disclosure could reasonably be expected to have a particular effect and prominence should be given to inferences capable of being drawn from established facts. The material presented* [in the case of the application for information substantially similar, or in part identical*, to that sought by you] does not deal with established facts but rather engages in speculation and possibilities. The Tribunal is not in a position to determine whether the assertions … are correct.*
>
> *In any event, the withheld information, in my opinion, would not assist in the identification of any alleged misconduct or negligent or improper ... I therefore give this public interest consideration in favour of disclosure little weight.*

Your timeline does not provide substantiated facts in relation to misconduct by any University employee and therefore it is appropriate that I give this public interest consideration in favour of disclosure little weight.

4.2.　Personal factors of the application

Under section 55 of the GIPA Act, in determining whether there is an overriding public interest against disclosure of information, the University is entitled to take into account the personal factors of the application, including an applicant's identity and relationship with any other person and the applicant's motives for making the access application.

I have not identified any personal factors in your application.

4.3.　Public interest considerations against disclosure

When applying the public interest test, the only public interest considerations against disclosure that I can take into account are those set out in the Table at section 14 of the GIPA Act ('**the Table**'). To show that they are relevant to the information you asked for, I need to consider whether they could reasonably be expected to have the effect outlined in

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[5] [2018] NSWCATAP 254 at [59]

the Table. I give the words "could reasonably be expected to" their ordinary meaning; that is reasonable, not irrational, absurd or ridiculous.[6]

Clause 1: Responsible and effective government

Clauses 1(d), 1(f) and 1(g) of the Table state:

> *"There is a public interest consideration against disclosure of information if disclosure of the information could reasonably be expected to have one or more of the following effects (whether in a particular case or generally):*
>
>> *(d)   prejudice the supply to an agency of confidential information that facilitates the effective exercise of that agency's functions,*
>>
>> *…*
>>
>> *(f)   prejudice the effective exercise by an agency of the agency's functions,*
>>
>> *(g)   found an action against an agency for breach of confidence or otherwise result in the disclosure of information provided to an agency in confidence, …"*

The object of the University is contained in subsection 6(1) of the *University of Sydney Act 1989* ('**University Act**'):

> *"The object of the University is the promotion, within the limits of the University's resources, of scholarship, research, free inquiry, the interaction of research and teaching, and academic excellence."*

The University's principal functions for the promotion of its object include, in subsection 6(2) of the Act:

> *(c)   the provision of courses of study or instruction across a range of fields, and the carrying out of research, to meet the needs of the community.*

Professor Holmes is employed by the University as ARC Australian Laureate Fellow[7] in the University's Faculties of Science and Medicine and Health. The Australian Research Council website states that:

> *The Australian Laureate Fellowships scheme reflects the Australian Government's commitment to excellence in research by supporting world-class researchers to conduct research in Australia.*[8]

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[6] *Attorney General's Department v Cockcroft* [1986] FCA 35; (1986) 10 FCR 180 at [190]; *Salmon v Department of Justice (Corrective Services New South Wales)* [2014] NSWCATAD 160 at [45]; *Eyes v Wyong Shire Council* [2016] NSWCATAD 120 at [26].

[7] https://www.arc.gov.au/grants/discovery-program/australian-laureate-fellowships

[8] https://www.arc.gov.au/funding-research/funding-schemes/discovery-program/australian-laureate-fellowships

Professor Holmes' public biography summaries his career as follows:

> *Professor Eddie Holmes is known for his work on the evolution and emergence of infectious diseases, particularly the mechanisms by which RNA viruses jump species boundaries to emerge in humans and other animals. He currently holds an ARC Australian Laureate Fellowship. He moved to the University of Sydney in 2012. He has studied the emergence and spread of such pathogens as SARS-CoV-2, influenza virus, dengue virus, HIV, hepatitis C virus, myxoma virus, RHDV and Yersinia pestis. His previous appointments include Verne M. Willaman Chair in the Life Sciences at the Pennsylvania State University, USA, and Affiliate Member of the Fogarty International Centre (2005-2012), National Institutes of Health, USA. From 1999-2004 he was Fellow of New College, Oxford. He is also an Honorary Visiting Professor at Fudan University, Shanghai. In 2021 he received the (Australian) Prime Minister's Prize for Science. He is the author of 691 peer-reviewed papers and two books. His publications have >116,000 citations (h-index of 156, i10-index of 649; …*[9]

Professor Holmes' work contributes to a primary function of the University, being the carrying out of research, to meet the needs of the community. Details of his research, teaching, publications and awards are published on the University's website. His work also contributes to the research functions, and thereby object, of the University. As noted above, Professor Holmes was awarded the Prime Minister's Prize for Science[10]. The citation for this award includes the following statements:

- *Professor Holmes played a transformative role in the scientific response to COVID-19. In early 2020, he was the first person in the world to publicly share the virus' genome sequence.*
- *Sharing this data was critical in helping the global response to the pandemic. It fast-tracked research efforts around the world and enabled work on designing a vaccine to begin within days, saving countless lives*[11].

The requested information consists of email messages created as private and confidential communications between researchers engaged in work related to SARS-CoV-2. Often quite informal, they concern aspects of research into the virus and also publications about the virus. The authors of the email messages wrote them to academic colleagues with an expectation of confidentiality. They discussed sensitive issues relating to their current research, proposals for publication and associated matters, and engaged in private commentary. The email messages were intended for and not written in a style intended for wider dissemination.

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[9] https://www.sydney.edu.au/science/about/our-people/academic-staff/edward-holmes.html

[10] https://www.pmc.gov.au/news-centre/government/2021-prime-ministers-prizes-science

[11] https://www.industry.gov.au/publications/prime-ministers-prizes-science-2021/2021-prime-ministers-prize-science

In *Alexander v University of Sydney and anor*[12] Judicial Member Higgins noted that in order to satisfy the element of confidentiality:

> *…it is not necessary to show that there was an express obligation or understanding that the information was given in confidence. It is sufficient for this to be implied from the circumstances in which the information was obtained or given.*

Working correspondence between researchers is usually treated as confidential by all parties. Researchers need to be able to exchange information and opinions, which may not be final, about their work. This exchange of confidential communications between academics is central to the University's functions because it fulfills the University's object of promoting, within the limits of its resources, scholarship, free inquiry, the interaction of research and teaching, and academic excellence.[13] The disclosure of such confidential communications can reasonably be expected to prejudice the University's ability to form collaborative partnerships and conduct research, due to the likelihood that academics would feel inhibited in their ability to discuss their research projects and findings. This would adversely impact on the University's ability to perform one of its principal functions, being 'the carrying out of research to meet the needs of the community.

In *Kang* Senior Member Ransome in relation to an access application for information substantially similar, or in part identical, to that sought by you, found that:

> *… overall, I am satisfied that the position put forward by the University that other academics and institutions would be more reluctant to enter into collaborative partnerships with the University if they thought their private communications would be released. … I consider that disclosure of such information would lead to more guarded discussions between academics which would have the opposite effect to that* [suggested].[14]

The Senior Member upheld the University's decision in relation to the weight given to these considerations against disclosure in response to this access application.[15]

Disclosure of the requested information could therefore reasonably be expected to have the effects outlined in clauses 1(d), 1(f) and 1(g) of the Table, and it is appropriate to take these public interest considerations into account when determining whether there is an overriding public interest against disclosure.

Clause 3: Individual rights, judicial processes and natural justice

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[12] [2008] NSWADT 214 at [26].

[13] *University of Sydney Act* 1989 (NSW) s 6(1).

[14] [2022] NSWCATAD 135 at [67]

[15] [2022] NSWCATAD 135 at [53] to [71]

Clauses 3(a), 3(b) and 3(f) of the Table state:

> *There is a public interest consideration against disclosure of information if disclosure of the information could reasonably be expected to have one or more of the following effects:*
>
> > *(a) reveal an individual's personal information,*
> >
> > *(b) contravene an information protection principle under the* Privacy and Personal Information Protection Act 1998 *(PPIP ACT),* …
> >
> > *…*
> >
> > *(f) expose a person to a risk of harm or serious harassment or serious intimidation,* …

Clause 4(1) of Schedule 4 to the GIPA Act defines personal information as:

> *… personal information means information or an opinion … about an individual (whether living or dead) whose identity is apparent or can reasonably be ascertained from the information or opinion.*

However, in accordance with clause 4(3)(b) of Schedule 4, personal information does not include:

> *information about an individual (comprising the individual's name and non-personal contact details, including the individual's position title, public functions and the agency in which the individual works) that reveals nothing more than the fact that the person was engaged in the exercise of public functions,* …

The definition of "personal information" in section 4 of the *Privacy and Personal Information Protection Act 1998* ("**PPIP Act**") is broadly similar to that in the GIPA Act, but includes some specific exemptions that are not relevant to your application.

The Information Protection Principle at section 18 of the PPIP Act provides:

> *(1) A public sector agency that holds personal information must not disclose the information to a person (other than the individual to whom the information relates) or other body, whether or not such other person or body is a public sector agency, unless:*
>
> > *(a) the disclosure is directly related to the purpose for which the information was collected, and the agency disclosing the information has no reason to believe that the individual concerned would object to the disclosure, or*
> >
> > *(b) the individual concerned is reasonably likely to have been aware, or has been made aware in accordance with section 10, that information of that kind is usually disclosed to that other person or body, or*
> >
> > *(c) the agency believes on reasonable grounds that the disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of the individual concerned or another person.*

Personal information, as defined by the GIPA Act and PPIP Act is contained in some of the requested information. Some of the email messages include matters and opinions personal to the authors of the messages, whose identity is apparent or can be reasonably ascertained from their content. As the information reveals more than the fact that the persons were

engaged in the exercise of public functions, the exception at cl 4(3)(b) of Sch 4 of the GIPA Act does not apply to it. Accordingly, clause 3(a) of the Table is a relevant public interest consideration to take into account when weighing the factors for and against disclosure of the information covered by your application.

The public interest consideration in clause 3(b) of the Table concerns disclosure of personal information in a way that would be contrary to section 18 of the PPIP Act. The exemptions in subsection 18(1) above are not relevant to disclosure of the personal information in the email messages covered by the original application. As a consequence, disclosure of the personal information would contravene the Information Protection Principle in section 18 of the PPIP Act, and could reasonably be expected to have the effect outlined at clause 3(b) of the Table at section 14 of the GIPA Act.

In *Kang*, referred to above, Senior Member Ransome stated:

> *I agree with the submissions of the University that the information was collected for the purpose of conducting research on the outbreak of SARS-CoV-2, not for the purpose of disclosure to the world under the GIPA Act. I am of the view that the exception in s 18(1)(a) of the PIPP Act does not apply.[16]*

The same circumstances apply in relation to the information responsive to your application.

The public interest consideration at clause 3(f) of the Table provides that there is a public interest consideration against disclosure of information if disclosure of the information could reasonably be expected to:

> *(f)   expose a person to a risk of harm or serious harassment or serious intimidation, …"*

In order to find that this public interest applies, I must be satisfied that release of the information could reasonably expose a person to intimidation or harassment that is heavy, weighty or grave, and not trifling or transient.[17]

Professor Holmes' role in the publication of the genetic sequence for SARS-CoV-2 on Virological on 11 January 2020[18] is widely known. He has been an author of more than twenty journal articles regarding SARS-CoV-2. A listing of Professor Holmes' publications is included in his staff profile on the University website.[19]

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[16] [2022] NSWCATAD 135 at [85]

[17] *AEZ v Commissioner of Police NSW Police Force* [2013] NSWADT 90 at [94], *Pallier v NSW State Emergency Service* [2016] NSWCATAD 293 at [81].

[18] https://virological.org/t/novel-2019-coronavirus-genome/319

[19] https://www.sydney.edu.au/science/about/our-people/academic-staff/edward-holmes.html

Along with many other scientific researchers[20] whose work includes SARS-CoV-2, Professor Holmes has been subjected to harassment and intimidation. An article in an Australian newspaper alleged without foundation that the China People's Liberation Army had been involved in some of Professor Holmes' research.[21] Since the publication of this article, Professor Holmes has been subjected to hate mail and online harassment, including death threats. In April[22] and July 2021[23] further inflammatory and incorrect statements were published about Professor Holmes and others involved in COVID-19 research. As a consequence of the associated and ongoing harassment, Professor Holmes ceased responding to social media posts.

While I do not suggest that you or the USRTK organisation are a party to the unreasonable attacks on scientists researching SARS-CoV-2 disclosure under the GIPA Act is in effect disclosure to the public at large, and cannot be subject to conditions and restrictions.[24]

Harassment and threats, including further death threats, against Professor Holmes continue, some of which have been reported to NSW Police.

For clause 3(f) to be a relevant public interest consideration against disclosure of information, it is sufficient that there is a risk of such harm, harassment or intimidation arising.[25] The meanings of harm,[26] harassment[27] and intimidation[28] have all been considered by the NSW Civil and Administrative Tribunal and its predecessor. All are relevant to the experience of Professor Holmes and his colleagues in relation to their research on SARS-CoV-2.

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[20] For examples see: https://www.bmj.com/content/372/bmj.n489 and https://www.dw.com/en/scapegoats-virologists-face-death-threats-during-coronavirus-crisis/a-53613193

[21] https://www.dailytelegraph.com.au/coronavirus/the-covid-files-australianfunded-coronavirus-paper-used-in-chinese-military-facility/news-story/7241a6b112816f3951495e0fa52ed2aa

[22] Jackson Ryan, "How the coronavirus origin story is being rewritten by a guerrilla Twitter group," *CNet*, 15 April 2021. https://www.cnet.com/features/how-the-coronavirus-origin-story-is-being-rewritten-by-a-guerrilla-twitter-group/#ftag=COS-05-10aaa0j

[23] GT staff reporters, "Exclusive: Western scientists face government probe, death threats for opposing COVID-19 lab-leak theory: source," *Global Times,* 5 July 2021. https://www.globaltimes.cn/page/202107/1227825.shtml

[24] GIPA Act ss 15(e) and 73.

[25] *DTB v Commissioner of Police, NSW Police Force* [2019] NSWCATAD 114 (*DTB*) at [77].

[26] *DTB* at [79]; see also *EIO v Central Coast Council* [2020] NSWCATAD 230 at [50].

[27] *DTB* at [80].

[28] *DTB* at [81].

Given the history of serious intimidation and harassment, and the nature of the continuing global discussion and debate about the origins of COVID-19, it is reasonable to expect that disclosure of the requested information would continue to expose a person to a risk of harm or serious harassment or serious intimidation.

The University has a strong duty of care, as well as work, health and safety obligations towards its staff members that requires it to act to protect staff from harassment or intimidation. Section19 of the *NSW Work Health and Safety Act 2011* ('**WHS Act**') provides that employers have a primary responsibility to "ensure, so far as is reasonably practicable, the health and safety of workers engaged."

A high threshold is required to displace the overriding presumption in favour of disclosure of information. A subjective fear that information release may expose a person to a risk of harm or serious harassment is not sufficient. As noted above however the threat in this case meets that threshold; the risk is heavy, weighty and grave, not trifling or transient, and it is continuing.

Therefore, clause 3(f) is a relevant public interest consideration, and it is appropriate to take it into account when determining whether there is an overriding public interest against its disclosure.

Clause 4: Business interests of agencies and other persons

Clauses 4 (d) and (e) of the Table at section 14 provide:

> *"There is a public interest consideration against disclosure of information if disclosure of the information could reasonably be expected to have one or more of the following effects:*
>
> *…*
>
> *(d) prejudice any person's legitimate business, commercial, professional or financial interests*
>
> *(e) prejudice the conduct, effectiveness or integrity of any research by revealing its purpose, conduct or results (whether or not commenced and whether or not completed).*
>
> *…"*

The requested information includes private and personal information communicated in a context where confidentiality was assumed and expected by all parties. In these informal exchanges, the researchers were privately discussing their work, publications and matters related to SAR-CoV-2. The requested information includes some sensitive information, tentative views, opinions and commentary not intended for publication or wider distribution. Disclosure of this information could reasonably be expected to impact on the researchers' professional positions and reputations, and thereby to prejudice their professional interests for the purposes of clause 4(d) of the Table. Accordingly, it is appropriate to take this public interest consideration into account when determining whether there is an overriding public interest against disclosure of the information you have sought.

As with the previous considerations against disclosure, *Kang* dealt with similar information subject to 4(d) (described as Items 1-6). Senior Member Ransome stated:

> *The information in Items 1-6 similarly concerns academics active within the field of research on SARS-CoV-2. In my view, in light of the nature of the information and the context within which the communications were made, to use the words of the Tribunal in Leech, it is not "purely speculative, fanciful, imaginary or contrived" to consider that the legitimate professional interests of the writers of the communication could be affected by the disclosure of Items 1-6.[29]*

Clause 4(e) of the Table is a relevant public interest consideration against disclosure if disclosure could be reasonably expected to prejudice the conduct, effectiveness or integrity of research by revealing its purpose, conduct or results. This consideration applies whether or not the research has commenced or been completed. Collaborative research, particularly research with international colleagues, relies on free communication of ideas, opinions, evidence and information. Hypotheses are presented, assessed and, if unsuitable, discarded. To have all such correspondence subject to international public scrutiny could reasonably be expected to negatively impact the collaborative relationships between researchers and prejudice the future conduct of such research.

Again, the decision in *Kang* is relevant, with Senior Member Ransome stating:

> *I accept the University's argument that reducing access by international academics to the research being conducted in China could reasonably be expected to decrease, rather than increase, long-term transparency in scientific research. I am satisfied that it is appropriate for me to take the public interest consideration set out in cl 4(e) into account when determining whether there is an overriding public interest against disclosure of the information in Items 1-8.[30]*

Accordingly, I consider that clause 4(e) is a relevant public interest consideration against disclosure of the email messages, and that it is appropriate to take it into account when determining whether there is an overriding public interest against disclosure.

4.4.   Consultation

In dealing with the original application the University found that the number of individuals whose personal information was included in the documents was such that it was not reasonably practicable to consult with them all. However, one key individual was consulted, who objected to disclosure of their personal information. That individual continues to object to the disclosure of the requested information. I have taken this objection to disclosure into account when applying the public interest test and coming to my decision.

No additional consultation was undertaken for this internal review.

4.5.   Balancing the public interest test

The object of the GIPA Act is to be achieved by authorising and encouraging proactive release of information, providing an enforceable right of access, and restricting access to

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[29] [2022] NSWCATAD 135 at [98]

[30] [2022] NSWCATAD 135 at [104]

government information only where there is an overriding public interest against disclosure. In accordance with section 13, there is an overriding public interest against disclosure of information for the purposes of the GIPA Act if (and only if) there are public interest considerations against disclosure and, on balance, those considerations outweigh the public interest considerations in favour of disclosure.

I have considered the relevant public interest considerations in favour of and against the disclosure of the requested information and taken note of the objection to disclosure following the consultation referred to in section 4.4 of this Notice. The public interest considerations in favour of disclosure are set out in section 4.1 of this Notice. The public interest considerations against disclosure are set out in section 4.3 of this Notice.

I have formed the view that disclosure of the requested information could reasonably be expected to have one or more of the relevant effects listed in the Table at section 14 of the GIPA Act. Accordingly, it is appropriate to take these public interest considerations into account when assessing whether there is an overriding public interest against disclosure.

I give strong weight to the consideration in favour of disclosure of information that facilitates public understanding of and transparency in University research. However I have also given considerable weight to the fact that information regarding the research conducted by Professor Holmes and his peers is published in the relevant scientific journals, is peer reviewed and is available online to any individual or organisation wishing to access it. I consider that, in this way, the public interest in the disclosure of government information regarding the research has been met.

I give some weight to the consideration in favour of disclosure of information that might assist in understanding the origins of the pandemic and the sequence of events that led to it.

In relation to consideration 3(f) in the Table, it is my view that the level of risk of harm or serious harassment that a person may be exposed to if the requested information were to be disclosed would be heavy, weighty or grave and not trifling or transient and that the risk is continuing and not abating. I have given this consideration very significant weight, and have formed the view that it outweighs the presumption in favour of disclosure.

Taking into account all the relevant factors, I am satisfied that the public interest considerations against disclosure set out in part 4.3 of this Notice outweigh the public interest considerations in favour of disclosure of the requested information. In particular, the public interest considerations in favour of disclosure (whether taken individually or cumulatively) do not outweigh the public interest in the University:

    a) exercising its functions by carrying out collaborative research to meet the needs of the community;

    b) protecting information provided to the University in confidence;

    c) protecting the right of third parties to the privacy of their personal information;

    d) complying with the requirements of the PPIP Act;

e) protecting individuals from the risk of harm or of serious harassment or serious intimidation;

f) protecting individuals' professional interests;

g) complying with its duties under the WHS Act; and

h) preserving the University's ability to effectively conduct collaborative research in the future.

In coming to my decision, I have taken into account that the University is prohibited by section 73(1) of the GIPA Act from imposing any conditions on the use or disclosure of information when the agency provides access to the information. I have taken into account that release of information under the GIPA Act is effectively 'release to the world'.

I have considered section 73(2) of the GIPA Act, which allows the University to impose a condition on how a right of access may be exercised, if the condition would avoid there being an overriding public interest against disclosure of the information. However, I am of the view that the imposition of a condition on access, such as inspection rather than providing a copy of the information, would not avoid an overriding public interest against disclosure.

5. Review rights

If you disagree with any of the decisions in this notice that are reviewable, you may seek a review under Part 5 of the GIPA Act. Before you do so, I encourage you to contact Dr Kate Cumming to discuss your concerns. Her contact details are set out below.

You have two review options:

- external review by the Information Commissioner; or
- external review by the NSW Civil and Administrative Tribunal (NCAT).

You have 40 working days from the date of this Notice to apply for a review by the Information Commissioner or the NCAT.

To assist you, I have enclosed a fact sheet published by the Information and Privacy Commission (IPC), *Your review rights under the GIPA Act*. You will also find some useful information and frequently asked questions on the IPC's website: www.ipc.nsw.gov.au.

You can also contact the IPC on freecall 1800 IPC NSW (1800 472 679).

6. Further information

If you have any questions about this notice or would like any further information, please contact Dr Kate Cumming on 9351 4263 or gipa.enquiries@sydney.edu.au.

Alyssa White

Alyssa White
Acting Chief Governance Officer, University Governance

7. Schedule of documents

(including relevant public interest consideration(s) against disclosure for documents not released or released in part).

The documents in the table below are identified by the date and time stamp of each item.

Note:
In the case of documents withheld in full not all of the public interest considerations against disclosure listed necessarily apply to the whole of any document. Rather the whole of the document is covered by public interest considerations against disclosure and any one or more of the public interest considerations against disclosure listed may apply only to part or to all of the document. In the case of documents withheld in part the relevant public interest consideration(s) against disclosure for withheld information is endorsed on each redaction mark on the released document.

Doc	Description	Public interest considerations against disclosure
1	20200108 0158 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
2	20200108 0644 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
3	20200109 0721 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
4	20200110 0748 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
5	20200112 0823 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
6	20200112 0838 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
7	20200112 0945 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
8	20200112 1231 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
9	20200112 2014 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
10	20200113 1949 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
11	20200115 0617 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
12	20200115 0617 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
13	20200115 1208 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
14	20200115 1208 - Email 2 Attachments	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
15	20200115 1208 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
16	20200115 1303 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
17	20200115 1746 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
18	20200117 1842 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
19	20200121 0636 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
20	20200121 0654 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
21	20200124 1007 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
22	20200124 1007 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)

23	20200124 1007 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
24	20200124 1007 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
25	20200124 1007 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
26	20200124 1007 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
27	20200124 1007 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
28	20200125 0947 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
29	20200125 1034 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
30	20200125 1039 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
31	20200125 2110 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
32	20200125 2110 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
33	20200125 2156 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
34	20200126 0913 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
35	20200127 0235 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
36	20200127 2345 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
37	20200128 0939 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
38	20200128 0939 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
39	20200128 0949 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
40	20200129 1804 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
41	20200130 0612 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
42	20200130 0612 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
43	20200130 0722 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
44	20200131 1856 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
45	20200131 2117 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
46	20200201 2353 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
47	20200202 0156 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
48	20200202 0234 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
49	20200202 0249 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
50	20200202 0250 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
51	20200202 0252 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
52	20200202 0252 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
53	20200202 0257 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
54	20200202 0310 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
55	20200202 0315 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
56	20200202 0505 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
57	20200202 0513 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
58	20200202 0513 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
59	20200202 0529 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)

60	20200202 0609 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
61	20200202 0657 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
62	20200202 0710 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
63	20200202 0730 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
64	20200202 0816 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
65	20200202 1013 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
66	20200202 1241 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
67	20200202 1329 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
68	20200202 1329 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
69	20200202 1329 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
70	20200202 1403 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
71	20200202 1403 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
71	20200202 1403 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
72	20200202 1406 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
73	20200202 1410 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
74	20200202 1452 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
75	20200202 1602 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
76	20200202 1616 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
77	20200202 1941 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
78	20200202 2021 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
79	20200202 2028 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
80	20200202 2038 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
81	20200202 2048 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
82	20200203 0651 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
83	20200203 0806 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
84	20200203 0806 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
85	20200203 0816 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
86	20200205 0508 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
87	20200205 0508 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
88	20200205 0709 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
89	20200205 0812 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
90	20200205 0812 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
91	20200205 0959 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
92	20200205 1008 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
93	20200205 1057 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
94	20200205 1104 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
95	20200205 1134 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)

96	20200205 1134 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
97	20200205 1134 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
98	20200205 1138 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
99	20200205 1456 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
100	20200205 1758 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
101	20200205 1758 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
102	20200205 2042 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
103	20200205 2042 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
104	20200205 2122 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
105	20200205 2123 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
106	20200205 2154 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
107	20200206 0106 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
108	20200206 0912 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
109	20200206 0912 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
110	20200206 0927 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
111	20200206 0942 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
112	20200206 0944 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
113	20200206 1111 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
114	20200206 1112 - Email with attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
115	20200206 2225 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
116	20200207 0724 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
117	20200207 1222 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
118	20200207 1222 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
119	20200207 1725 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
120	20200207 2311 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
121	20200207 2334 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
122	20200208 0810 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
123	20200208 0903 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
124	20200208 1347 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
125	20200208 1347 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
126	20200208 1359 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
127	20200208 2046 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
128	20200208 2046 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
129	20200208 2046 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
130	20200208 2046 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
131	20200208 2304 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)

132	20200209 0213 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
133	20200209 0341 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
134	20200209 0637 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
135	20200209 0637 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
136	20200209 0653 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
137	20200209 0653 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
138	20200209 0711 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
139	20200209 0722 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
140	20200209 0731 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
141	20200209 0731 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
142	20200209 0731 - Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
143	20200209 0731 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
144	20200209 0815 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
145	20200209 0816 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
146	20200209 0825 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
147	20200209 0827 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
148	20200209 0842 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
149	20200209 0950 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
150	20200209 1629 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
151	20200209 1629 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
152	20200209 1704 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
153	20200209 1807 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
154	20200209 1807 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
155	20200209 1807 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
156	20200209 1827 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
157	20200210 0312 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
158	20200210 0701 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
159	20200210 0701 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
160	20200210 0708 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
161	20200210 0859 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
162	20200211 0635 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
163	20200211 0635 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
164	20200211 0851 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
165	20200211 1000 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
166	20200211 1024 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
167	20200212 1422 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)

168	20200212 1931 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
169	20200214 0725 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
170	20200214 2213 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
171	20200215 0752 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
172	20200215 0752 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
173	20200216 0622 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
174	20200216 1003 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
175	20200216 1546 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
176	20200216 1546 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
177	20200216 1546 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
178	20200216 1941 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
179	20200216 2010 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
180	20200216 2057 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
181	20200216 2057 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
182	20200216 2155 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
183	20200217 0130 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
184	20200217 0910 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
185	20200217 0910 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
186	20200217 1004 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
187	20200217 1031 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
189	20200217 1031 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
190	20200217 1135 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
191	20200217 1135 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
192	20200217 1305 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
193	20200217 1305 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
194	20200217 1318 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
195	20200217 1431 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
196	20200217 2039 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
197	20200217 2045 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
198	20200217 2058 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
199	20200217 2058 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
200	20200217 2100 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
201	20200217 2102 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
202	20200217 2106 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
203	20200217 2109 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
204	20200217 2113 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)

205	20200217 2122 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
206	20200217 2126 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
207	20200217 2128 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
208	20200217 2131 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
209	20200217 2131 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
210	20200217 2133 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
211	20200217 2138 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
212	20200217 2140 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
213	20200217 2140 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
214	20200217 2150 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
215	20200217 2153 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
216	20200217 2153 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
217	20200217 2206 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
218	20200217 2206 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
219	20200217 2209 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
220	20200217 2247 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
221	20200218 0056 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
222	20200218 0132 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
223	20200218 0307 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
224	20200218 0307 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
225	20200218 0352 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
226	20200218 0352 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
227	20200218 0355 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
228	20200218 0356 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
229	20200218 0402 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
230	20200218 0402 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
231	20200218 0410 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
232	20200218 0410 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
233	20200218 0451 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
234	20200218 0517 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
235	20200218 0713 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
236	20200218 0729 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
237	20200218 0735 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
238	20200218 0743 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
239	20200218 0756 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
240	20200218 0850 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)

241	20200218 0850 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
242	20200218 0852 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
243	20200218 0920 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
244	20200219 1133 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
245	20200221 0627 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
246	20200221 0849 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
247	20200221 0856 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
248	20200221 0928 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
249	20200225 0525 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
250	20200228 0714 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
251	20200305 1134 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
252	20200305 1306 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
253	20200305 1306 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
254	20200305 1306 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
255	20200306 0518 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
256	20200306 2024 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
257	20200307 0822 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
258	20200307 0822 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
259	20200307 0822 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
260	20200307 0822 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
261	20200307 0822 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
262	20200307 0822 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
263	20200307 1319 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
264	20200307 2027 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
265	20200307 2033 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
266	20200309 0024 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
267	20200309 1224 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
268	20200312 0428 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
269	20200318 0903 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
270	20200318 0903 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
271	20200319 0223 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
272	20200319 0759 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
273	20200319 2032 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
274	20200319 2038 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
275	20200319 2039 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
276	20200319 2039 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)

277	20200319 2039 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
278	20200319 2051 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
279	20200321 1255 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
280	20200321 1826 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
281	20200321 1828 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
282	20200327 0049 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
283	20200328 0234 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
284	20200330 0720 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
285	20200402 0701 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
286	20200403 0937 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
287	20200403 2137 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
288	20200404 0817 - Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
289	20200404 1701 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
290	20200405 0949 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
291	20200405 1021 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
292	20200405 1112 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
293	20200408 0342 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
294	20200408 1105 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
295	20200408 1318 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
296	20200408 1327 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
297	20200408 1357 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
298	20200409 1235 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
299	20200410 0300 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
300	20200410 0400 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
301	20200410 1839 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
302	20200411 1252 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
303	20200412 0429 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
304	20200412 0429 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
305	20200414 0807 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
306	20200416 0109 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
307	20200416 2136 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
308	20200416 2136 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
309	20200416 2149 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
310	20200422 2215 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
311	20200501 1020 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
312	20200501 1035 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
313	20200501 1257 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
314	20200509 0840 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
315	20200527 1132 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
316	20200527 1143 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
317	20200605 0103 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)

318	20200605 0103 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
319	20200605 0103 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
320	20200605 0816 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
321	20200605 0816 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
322	20200605 1021 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
323	20200606 1142 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
324	20200613 2103 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
325	20200614 1726 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
326	20200615 0957 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
327	20200615 2157 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
328	20200628 0455 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
329	20200628 1106 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
330	20200628 1106 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
331	20200628 1737 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
332	20200715 2157 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
333	20200721 1951 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
334	20200724 0406 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
335	20200728 1106 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
336	20200728 1106 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
337	20200728 1157 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
228	20200728 1158 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
339	20200728 1255 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
340	20200728 1354 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
341	20200728 1737 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
342	20200728 1821 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
343	20200728 2028 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
344	20200729 0108 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
345	20200729 0630 – Email Attachment	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
346	20200729 0630 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
347	20200729 0643 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
348	20200729 0657 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
349	20200729 0711 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
350	20200729 0803 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
351	20200729 1026 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
352	20200729 1028 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
353	20200802 1922 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
354	20200916 2158 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
355	20200918 0124 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
356	20201026 1647 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)

357	20201106 0904 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
358	20201107 0939 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
359	20201117 1235 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
360	20201119 0102 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
361	20201120 1042 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
362	20201120 1130 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
263	20201120 1856 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
264	20201126 0725 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
365	20201126 0825 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
366	20201204 2038 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)
367	20201212 0938 – Email	Clauses 1 (d), (f), (g), 3 (a), (b), (f), 4 (d), (e)