



FIRST-TIER TRIBUNAL

GENERAL REGULATORY CHAMBER

Appeal No. EA/2012/0096

YIANNIS VOYIAS

Appellant

and

THE INFORMATION COMMISSIONER

Respondent

and

LONDON BOROUGH CAMDEN

Second Respondent

Subject

Freedom of Information Act 2000 ('FOIA'): s3(2)

DECISION

The Appeal is denied.

Reasons For The Decision

The Request for Information

1. On 28 April 2011, the Appellant requested the Second Respondent ('the Council') provide:

"a copy of any emails received or sent by [named councillor] on his Camden.gov.uk email address, on 13 April 2011. Please redact any names or other personal information."
2. On 17 June, the Council replied withholding some emails that it claimed were exempt from disclosure under s40 FOIA concerning personal data.
3. The Appellant progressed the matter through the usual channels. The Information Commissioner ('ICO' or 'Commissioner') concluded that the withheld emails were not actually 'held' by the Council within the meaning of s.3(2) FOIA and they could not be required to disclose them.

Grounds of Appeal

4. The Appellant's grounds of appeal may be summarised as:
 - i. The information requested is held by the Council, and
 - ii. It does not fall within s40 FOIA since the Appellant specifically requested that the names or other personal information be redacted. (We have not set out below our consideration of this second ground because we find that the information is not held.)

The Task of the Tribunal

5. The Tribunal's remit is governed by section 58 FOIA. This requires the Tribunal to consider whether the decision made by the Commissioner is in accordance with the law or whether he should have exercised any discretion he had differently. The Tribunal may receive evidence that was not before the Commissioner, and may make different findings of fact from the Commissioner. This is the extent of the Tribunal's remit in this case, and therefore we do not consider any other issues raised, such as the proper use of public funds or council email addresses.
6. The issues for this Tribunal are:
 1. Scope: Where the emails sent or received on 13 April 2011 had embedded within them emails predating them, do the latter fall within scope of the request?
 2. Held: Are any or all categories of withheld information 'held' by the Council?

The Law

7. Under s.1(1) of FOIA, a person making an information request to a public authority is entitled to be informed in writing whether the public authority holds the requested information and to have it communicated to him, unless it is exempt from disclosure under the Act.
8. The FOIA does not define what it means to hold information. However, s3(2) FOIA provides:

"(2) ...information is held by a public authority if -

- (a) it is held by the authority, otherwise than on behalf of another person, or*
- (b) it is held by another person on behalf of the authority."*

9. The Upper Tribunal in *University of Newcastle upon Tyne v Information Commissioner and BUAV*¹ ('BUAV case') has clarified:

"[21]... The effect of paragraph (a) is that information held by the authority on behalf of another is outside s.1 only if it is held solely on behalf of the other: if the information is held to any extent on behalf of the authority itself, the authority 'holds' it within the meaning of the Act. The effect of paragraph (b) is that the authority 'holds' information in the relevant sense even when physically someone else holds it on the authority's behalf..."

[23]...'Hold' is an ordinary English word... it is necessary to observe that 'holding's not a purely physical concept... we consider that s.1 would not apply merely because information is contained in a document that happens to be physically on the authority's premises: there must be an appropriate connection between the information and the authority, so that it can be properly said that the information is held by the authority. For example, an employee of the authority may have his own personal information on a document in his pocket while at work, or in the drawer of his office desk: that does not mean that the information is held by the authority. A Government Minister might bring some constituency papers into his departmental office: that does not mean that his department holds the information contained in his constituency papers..."

[24] There is no dispute but that the example given in the final sentence of this paragraph was taken from the official Explanatory Notes to FOIA (at paragraph 31)"

*"[28] The test that FOIA uses is whether the public authority "holds" the requested information. The choice of statutory language must be significant. The test is not whether the public authority "controls" or "possesses" or "owns" the information in question; simply whether it "holds" it (as was observed by the information tribunal in *Quinn v Information Commissioner [(EA/2005/0010) at [50]]*). "Hold", as the present tribunal also noted, is an ordinary English word and is not used in some technical sense in the Act..."*

Quoting *McBride v Information Commissioner and Ministry of Justice*

¹ [2011] UKUT 185 (AAC).

EA/2007/0105 at paragraph 27:

"[37]...the question of whether a public authority holds information on behalf of another is simply a question of fact, to be determined on the evidence."

10. In other words, the question of whether information is 'held' is one to be determined on the facts of the case, applying the ordinary English meaning of the word. However, it is not simply a question of whether the information is physically on the authority's premises but also whether there is an appropriate connection between the information and the authority, such that it does not hold it solely on behalf of another.

Evidence

11. We have considered all that the parties submitted, including the withheld information, even if not specifically referred to below. We have not considered it necessary to provide any part of our reasoning in this decision in closed form.

ICO

(a) ICO Guidance

12. The ICO guidance for councils of 4.12.09: '*Information Produced Or Received By Councillors*', stating:

- a. Purpose of information

The purpose of the information and capacity in which it is held is more indicative of if it falls within FOIA, than where it is located. Information created or received by a councillor but held on an authority's computer system or premises will only be covered if held for the authority's own business. Whether information relates to the authority's own purposes, does not depend solely on the legal status or functions of the authority. Relevant factors may include:

- i. the amount of control the authority has over the information;
- ii. whether the information is produced or used by the authority's staff; and
- iii. whether the authority provides for these purposes out of its own budget.

- b. The role being carried out by the Councillor:

They act on behalf of local authority:

- i. As a cabinet member;
- ii. Having executive responsibility for a service area. eg representing the authority on a regional board, forum or drafting an authority's response to a consultation;
- iii. Carrying out administrative functions such as producing minutes of meetings or updating websites.

They act as elected representative²:

² Presumably, the ICO does not consider they act on behalf of a local authority in these cases.

- iv. Corresponding with residents in their ward and seeking to resolve their problems;
 - v. Campaigning on behalf of a political party;
 - vi. Corresponding between councillors. This is not generally covered by the FOIA, even when it concerns council business because it is a key part of the councillor's role as an elected representative and not done on behalf of the local authority. E.g. In discussing issues which affect the council and agreeing how to vote.
- c. A useful comparison can be drawn with Members of Parliament ('MP') who are not 'public authorities' (for FOIA purposes) and correspondence between them is not covered by the FOIA. However, the FOIA does cover correspondence between ministers on departmental business, or information relating to the work of a select committee. □
- d. Examples:
- i. An elected member using the local authority's computer or office facilities for political or representative purposes: the information is held by the councillor, and not covered by the FOIA. □The council should have a policy to ensure that information (physically on the council's systems) belonging to a councillor is clearly distinguished from its information. □
 - ii. Information sent by the councillor to the local authority (eg a letter to the housing department in support of a resident facing eviction): will be held by the authority for its own purposes.
 - iii. The local authority providing administrative support (not just storage and office facilities): may be held for the council's purpose and so covered by the FOIA.

(b) Web page from Direct.gov.uk

13. Entries from the direct.gov.uk website including:
- a. *"Councillors are elected by the local community and are there to represent its views. Each councillor represents an area called a ward, serving for four years..."*
 - b. *The work of a councillor includes holding surgeries to help local people, supporting local organisations, campaigning on local issues, and developing links with all parts of the community.*
 - c. *Councillors are not paid a salary or wages, but they are entitled to allowances and expenses to cover some of the costs of carrying out their public duties. They are not council employees. The elected councillors provide the policies, and then paid employees (council officers) put them into practice."*

Second Respondent

(a) Witnesses

14. A personal assistant providing administrative and secretarial support to councillors gave testimony including:
- a. She had daily contact with councillors and coordinated FOIA responses. A support manager also provided administrative and information support to all 54 councillors.
 - b. She had advised the relevant councillor that any emails sent or received to/from residents, discussing council business or any emails campaigning on behalf of his political party would be exempt. However, his correspondence with the Council's officers, even if on behalf of ward residents, would need to be disclosed.
 - c. That the Camden website explained:

“Councillors are elected by the community to represent the interests of local people in our policy making process. They have a key role in ensuring we fulfill our duties and take collective decisions which form the policy of the council. The council therefore reflects the views of the majority of the members.

One of the key aspects of being a councillor is the opportunity to become involved in local issues and make a difference to the lives of local people. Councillors have close contact with their local community and hold regular surgeries. These surgeries are for people to meet privately with their local councillor to discuss individual problems or issues. For example, this could mean assisting a resident in finding support for an elderly relative or helping to solve a housing problem.

This work gives an insight into the needs of the community, which can be translated into action by the council.

Council officers advise councillors on their work. These are professionally trained staff that are employed to carry out the functions and duties of the council as decided by its elected councillors.

Councillors are also becoming involved in the process of overview and scrutiny.

Councillors may also represent the community and the council on partnerships and outside bodies.”
 - d. When councillors are elected, the council offers them IT equipment (including email and internet) along with the protocol governing how to use the equipment. Councillors will be in contact with local residents to be involved in local issues and make a difference to their lives, and council officers assist this work. The Council does not retain Councillor's emails on a separate server.
15. The Council's senior legal officer also provided a statement, which is not repeated here.

(b) The Council's 'Use of Information Technology: Guidance on the Member Code of Conduct'

16. Guidance for councillor's on the use of IT including:
 - a. Councillors must not use equipment to conduct any business activity other than for their role as a Member for Camden.
 - b. Councillors may use the email and internet for personal use. The onus is on them to advise correspondents that the email may be monitored.

(c) Register of Interest for Specified Councillor

17. The Council submitted entries from its register of interests. This made clear that the named councillor had made known that he was a trustee for the Campaign for National Parks.

Submissions

Appellant

18. The Appellant's arguments included³:
 - a. Scope: The disputed information included information emailed to or from the named councillor on 13 April 2011, but not drafted on that day. He had requested *any* information *received* by the councillor to be disclosed and this included any emails that were part of a 'chain' of emails, or email 'conversation' received that day.
 - b. Held: The Council held the requested information:
 - i. It is part of a councillor's duties to address concerns of local residents through emails, etc. The results of these emails feed into council policy e.g. through consultations. It is a mechanism, which is both part of and feeds into local government functions.
 - ii. Communicating with residents is a democratic function, which the councillors carry out on behalf of the Council.
 - iii. An MP is elected to Parliament, not to a government department. A local councillor is by contrast elected to the local council. The role of an MP to meet his constituents and address any issues they may wish to raise is totally separate and independent from the role that MP might have as a minister in a government department. On the other hand, the role of the councillor towards local residents should be viewed as a

³ We have added our own titles and formatting, purely for ease of reference.

mechanism which is both part of and feeds into local government functions, for example by allowing the grievances of a resident to shape council policy (e.g. after consulting with residents, a councillor uses his position in the relevant local council committees to increase the number of street cleaners employed in a certain ward)

- iv. The fact that a councillor may shape local government policy, may find himself suspended from office following a complaint to the local council, and may even receive from the local authority financial assistance and reimbursement for travel, seems to make it clear that the role of a councillor is embedded within the local government itself, and not independent. A councillor is an integral part of the local state apparatus, which is used to assist residents and both formulate and ensure the smooth implementation of social policies. Furthermore, a councillor would not be corresponding with residents if he had not been elected into the council. In contrast, all MPs meet with their constituents regardless of whether they are government ministers or not (the two roles are totally independent).
- v. In the example provided in the Explanatory Notes to the FOIA, the minister brought the information into the office temporarily, and unintentionally. It would apply to information obtained by a government minister in the course of work totally independent to and unrelated from his government position. By contrast, the current case relates to the communication of information through official local government channels. It was intended to clarify that information obtained by a government minister in the course of work totally independent to and unrelated from his government position did not fall under the FOIA. The current case involves communication through the official channels of the council using its servers would be the equivalent of a Government Minister bringing some constituency or personal papers into his departmental office, and then sending them to someone from his departmental office, in an envelope with his official department's address on it, and his position in that department appearing before his name on the envelope. This would bring those papers within the scope of his department's business.
- vi. If a councillor were to send a letter from his official address at the town hall, and with 'councillor' appearing next to his name on the envelope, then he would be doing this in the course of his employment as a councillor, and Camden would therefore be deemed to have notice of this. The effect of using Camden's email would be the same.
- vii. The *BUAV* case indicates that each case must be taken on its own facts. In certain circumstances, the mere fact that the information in question is knowingly stored within the public authority's own storage system would be sufficient for an appropriate connection to materialise. In the current case, the following facts are sufficient for such a connection:
 - The disputed information did not simply happen to be in the local authority's possession as personal documents on a desk. It was intentionally sent or received through the local authority's own official 'camden.gov.uk' email system. Only employees of the Council have such email addresses.

- The disputed information was not only contained within a public authority's server but was also readily available to Camden's employees such as those in the IT team or the FOI team and they could be '*deemed to have notice*' of it.
- Since if the disputed information had at any point been forwarded or copied to an employee of Camden, then it would have been 'held', it would seem to follow that the employee of Camden who retrieved the disputed information in order to process my original FOI request could also be '*deemed to have notice*' of this information.

Personal Emails

viii. A councillor who misuses his position by using publicly funded services for his own private business should not be exempt from the FOIA because of his own misconduct.

ix. If simply labelling some of the information as 'private' or 'personal' provided a way for councillors to avoid the application of the FOIA then this would reduce the effectiveness of the Act in the extreme. This is the FOIA in action, at its best – the whole point of the Act is to enable the public to investigate and scrutinize any possible misuse of public funds and resources, and to ensure transparency in relation to the use of taxpayers' money.

19. In response to the panel's further questions to the parties:

- a. The Commissioner and/or Council rely on their own guidance to councillors, including, for example, that councillors would need to register as data controllers. (We presume by this he means that this guidance cannot therefore carry additional evidential weight.) This ignores the fact that the Council itself is also registered as data controller. In any event, this is at best tangential to this case.
- b. The Explanatory Notes (referred to in the BUAV case) are of 'extremely limited' assistance to construction of the statute. It would be impossible to argue that [any] information held by an MP relating to constituency work would [always] fall outside FOIA, as this would essentially constitute a blanket rule. This would go against the FOIA principle underlying the 'appropriate connection' test established in the BUAV case, which demands that each case be considered on its own facts (and not merely whether the information relates to constituency work), in order to determine whether an appropriate connection exists.
- c. A councillor may be ejected from his position, losing all of his functions as councillor, for instance, where not abiding by the code of conduct for councillors. The fact that a councillor may perform different council functions does not therefore mean that whether he would be acting on behalf of the council would depend on what function was being performed. A councillor acts on behalf of the council when liaising with residents for example, and also when being part of a committee. They are both indispensable roles relating to the operation of the Council as a whole, and are both roles, which are determined by the Council. Its attempt to create a distinction between non-official and 'official council business' is therefore meaningless, as it is clear that a councillor is in reality acting on behalf of the Council. The existence of what is not termed

a salary but is remuneration for all intents and purposes merely confirms this position.

ICO

20. The Commissioner's arguments included:

Held

- i. Whilst the requested emails were held on the Council's server, it held them on behalf of the councillor, not the Council. This was because they did not concern Council business, but instead (a) correspondence between the councillor and constituents in his role as a ward councillor, (b) personal matters of the councillor, or (c) business which was external to Council activities.
- ii. The direct.gov.uk website made clear that Appellant's argument that the councillor was akin to a council employee, such that any email were held by the Council, was incorrect.
- iii. The Commissioner considers Local authorities to be distinct from its councillors. The former, it states are 'public authorities' in Schedule 1 of FOIA. By contrast, individual councillors are not 'public authorities' under FOIA. There is not, therefore, under FOIA any right of access to information held by councillors.
- iv. Part 1 to Schedule 1 of FOIA sets out that 'any government department', 'The House of Commons' and 'The House of Lords' are all public authorities. Like individual councillors, MPs are not public authorities under FOIA in their own right. There is not, therefore, under FOIA any right of access to information held by MPs in that capacity. Although its decision is not binding on this Tribunal, the Tribunal in the case of Corporate Officer of the House of Commons (EA/2006/0074, 0075 & 0076) accepted that MPs were not public authorities under FOIA:

"... We also accept that each individual MP is not a public authority under the Act. If the Act had intended that individual MPs were to be public authorities, it would have said so in clear terms. We accept that the Act intends that the House of Commons – the body made up of MPs collectively – is to be a public authority.

The Tribunal also accepts that information that is held merely by an individual MP does not come within the scope of the Act. For instance, an individual MP's casework files do not come within FOIA. Information about an individual MP's expenses, if held merely by that MP as an individual, does not come within the scope of the Act either, since it is not information held by a public authority.

However we find that where information is held by the House collectively, and not simply by an individual MP, then it falls within the scope of the Act. It is accepted by the parties in the present case that the disputed information is held by the House collectively. There has been no suggestion at all that the disputed information is information that is merely held by individual MPs, or that the

disputed information is not held by the House. Rather the appeal has been put on the basis that the information sought is exempt from disclosure under the Act. (See Para.s 42-44)

- v. Whether information is 'held' by any public authority is to be determined as set out above. It is the Commissioner's position that even if a council holds information on its premises or computer system which was created or received by a councillor the information will not fall within the FOIA regime by virtue of that fact alone: it will only be 'held' if it is held on the council's own behalf. Although FOIA does not refer to functions the Commissioner has suggested in his guidance that referring to the 'functions' that a councillor has (or 'hats' he/ she wears) may assist when deciding whether information is 'held' for the purposes of FOIA by a council.
- vi. **Ward resident communications:** The role of ward councillor, e.g. in holding surgeries, corresponding about particular constituents' issues, is not an executive function of the council, but rather a function of the councillor as an individual representative. This is consistent with the established position for MPs – there is no material difference between an MP acting as local constituent's representative and that of a councillor representing that of a ward resident. It is also consistent with the position under the DPA where elected members have to notify as a separate data controller when acting as a representative of the residents of their ward.
- vii. **Personal Emails:** The Appellant's assertion that, by definition, emails sent and received to a council email account could not be private, ignored that the councillor may have no control over which email address a correspondent chose to send a message to, and did not detract from the private nature of the email.

Second Respondent

21. The Council's arguments insofar as they differed from the ICO included:

Scope

- a. That the disputed information included 'resident emails'; one email on 'Housing Benefit advice'; and eight emails relating to the named councillor's work as a Trustee for the Campaign for National Parks. Some of the withheld emails consisted of chains of emails not dated 13 April 2011. Camden considered that only those dated 13 April 2011 fell within the ambit of the request.

Held

- b. The Council submits that it is clear from the above, and the examples cited in paragraph 47 of the *BUAV* case, that in order to ascertain whether information is 'held' there must be an appropriate connection between information and the authority, so that it can 'properly' be said that the information is held by the authority. In the *BUAV* case, the Tribunal made specific findings of fact when addressing this issue. It noted that the same

approach was followed in *McBride v Information Commissioner and Ministry of Justice* (EA/2007/0105: see in particular paragraph 27) and *Digby-Cameron v Information Commissioner* (EA/2008/0010) ('the *Digby*' case). It noted that in *Digby*, the Tribunal when determining whether the requestor was able to use FOIA to obtain a transcript of an inquest hearing from the local authority, clearly looked at the role and function of the Coroner, who was appointed by and whose salary and expenses were paid by the Council, when concluding that on the facts the local authority held the information solely on behalf of another.

- c. It explained that it considered that a councillor has a number of multi-faced roles, some relating to their function as an elected member (representing a political party, representing residents in their ward and holding councillor surgeries etc.) and some relating to the Council's functions. Whether a public authority holds information or holds it on behalf of another is a question of fact for the Tribunal to determine, which includes taking into account the roles and functions being performed, when considering the purpose of the information and the capacity in which it is held.
- d. The Council also thought that the position of an MP was analogous to the role of a councillor in that information obtained by a councillor as an elected member and not relating to their role on behalf of a local authority would not fall within the ambit of FOIA.
- e. In the *Digby* case, where the Coroner held the requested information solely on behalf of the Coroner, the latter was not a local authority for the purposes of FOIA, had to register as a data controller in his own right, occupied premises provided by the council and received administration support from council staff. In this appeal, councillors have to notify separately as data controller in their own right, receive administrative support from the Council, but in respect of their functions as an elected member, for example when acting as a representative of their ward or corresponding with constituents, they retain ownership and control of the information. The Council does not control that information in the same way as it would with information held in its own right. It noted that it was often the case that councillors in their work as an elected member, (not in relation to their role on behalf of the local authority), would oppose the Council and could at times arrange to give evidence against the Council. They were truly independent in the same way as an MP was.
- f. In response to the panel's question, the Council confirmed that no salary was paid to councillors and they are not the Council employees. However, they were entitled to allowances and expenses to cover some of the costs of carrying out their public duties. Each member of the Council was entitled to £9,654.00 by way of basic allowance and posts undertaking special responsibilities were entitled to further allowances. For example, of £28,716.00 as Leader of the Council.
- g. **Ward resident communications:** The Appellant's assertion that a councillor "*communicating with residents is quite clearly a democratic function*" was not the correct test. The correct test was whether the communication was on behalf of the Council. (See s.3(2) FOIA and the *BUAV* case.)

- h. **Personal Emails:** As regards the Appellant's assertion that emails sent to a council email address cannot be private, the BUAV case indicated that there must be an appropriate connection between the information and the authority.
- i. **Trustee for Campaign for National Parks emails:** these did not relate to council business, but instead a voluntary role undertaken separately from the councillor's executive work and therefore were not held on behalf of the Council.

Our Findings

22. Scope: It is clear to us that the disputed information includes information emailed to or from the named councillor on 13 April 2011, whether drafted that day or included as part of a chain of emails or email conversation received that day. This is because, as the Second Respondent stated, he had requested any information received by the councillor to be disclosed.
23. Held: We do not consider the requested information to be held by the Council. This is because:
- a. The requested information is information held by the authority solely on behalf of another because it is not to any extent held on behalf of the authority itself.
 - b. The emails are held on the authority's server, which although perhaps accessed by the councillor at home, are akin to being physically held on the authority's premises. We therefore must consider whether there is an appropriate connection between the information and the authority, so that it can be properly said that the authority holds the information.
 - c. The requested information that relates purely to private correspondence is not held on behalf of the authority even though it has been sent to the councillor's work email address. This is because there is not a sufficient nexus between the information and the authority. The information is not work-related and did not arrive at the council server by virtue of the councillor's work as a councillor or any job he performs for the Council. The fact that the emails are in some way on local authority premises is incidental to the local authority itself. This is similar to a council employee receiving a birthday card in his office and leaving it in his office desk. (In response to the Appellant's concern, we would note that we agree that simply labelling information as 'private' would not be sufficient to avoid the application of FOIA to it. We have considered the particular emails, and are satisfied that they are purely private in their substance or quality.)⁴
 - d. The requested information that relates to the councillor's trustee work is also not held by the authority. This is because there is not a sufficient nexus between the information and the authority. It has nothing to do with the Council's work, or even with the councillor's work as a councillor of the authority.

⁴ These are emails on pages 1, 2, 19 (top half) and 46 of the closed bundle that contained all the requested information.

- e. The remaining information comprises correspondence between ward residents and the councillor, which has not been forwarded to the Council by the councillor, except for the purposes of the Council, Commissioner and Tribunal needing to consider whether it falls within FOIA for the purposes of the information request. Whether this information is held in any way on behalf of the authority seems to depend upon whether such information is held i.e. sent, received or kept for the authority. In this category, the emails arrive by virtue of a function the councillor performs by virtue of being a councillor. We think the question of whether the connection between the information and Council is sufficient to say the information is held on its behalf depends on whether the function is performed in any way on behalf of the Council.
 - f. We have not been strongly persuaded one way or the other by the arguments put to us on a theoretical basis as to why material received to or from the councillor by residents would by that function not be held by the Council. However, by reviewing the material itself we think it is clear that the councillor in receiving or sending correspondence was acting in a role that was independent of the Council and not in any direct way on behalf of the Council. This, for us, has been the deciding factor. To the extent he acts on anyone's behalf or holds information on anyone's behalf, it is on behalf of the ward residents.
24. We would note that the fact that the disputed information was said by the Appellant to be readily available to Camden's employees such as those in the 'IT' team or the FOI team, such that they have notice of it would not alter our view – the relevant question is whether the information that is equivalent to being 'physically held' at the Council has a sufficient connection with it to be said to be held on its behalf. Likewise, that an employee of Camden may have retrieved the disputed information in order to process the FOI request and so 'could also be deemed to have notice of this information', does not make it held by the authority.
25. The Appellant argued that if a councillor were to send a letter from his official address at the town hall, with 'councillor' appearing next to his name on the envelope, then he would be doing this in the course of his employment as a councillor, and Camden would therefore be deemed to have notice of this. The effect of using Camden's email would be the same. We have decided the case based on whether the information itself is sufficiently connected to the authority to be said to be held by it. The Council's councillors have been given permission to use the email system for non-Council purposes, perhaps in the same way that an employee can use his office desk based at work to store coffee.
26. Our decision is unanimous.

Judge Taylor

24 January 2013