FreedomInfo.org Appeal in Matter AI3127
April 2, 2014


FreedomInfo.org requested asked for three types of information.
- Copies of all access to information requests submitted in the month of October, 2013.
- Any list of access requests in the month of October, 2013.

The Bank has indicated that it does not have documents responsive to items (2) and (3) of the FreedomInfo.org request: for lists and summaries. FreedomInfo.org does not contest these determinations.

FreedomInfo.org applauds the Bank’s stated intention to develop a system for releasing summaries of request letters and would be pleased to make recommendations on that topic at a later point.

As a procedural note, FreedomInfo.org observes that the Bank denial letter incorrectly states that FreedomInfo.org did not indicate the grounds for its Feb. 7 appeal. While it is possible that the Bank failed to receive such an indication, FreedomInfo.org replied twice to Bank requests for clarification, sending reply messages in the originating address (wbgaccess@worldbank.org) on Feb. 12 and Feb. 19. Although FreedomInfo.org and Bank staff had been in telephone communication on this matter previously, it appears there was no effort to call the applicant for a clarification. Having communicated these concerns with Bank staff after receiving the denial letter, FreedomInfo.org received a note of thanks and understands that the Bank was examining its message system.

In any event, the AIC considered the appeal both on violation of policy and public interest grounds.

Grounds for Appeal
FreedomInfo.org maintains that the denial is a violation of the Bank’s Access to Information Policy for several reasons.
First, the AIC has interpreted of the Safety and Security provisions incorrectly. The Appeals Board should decide that the denial is not properly based on the Safety and Security exemption and articulate some guidelines for applying that exemption.
Second, the AIC is wrongly invoking the “blanket” test to undermine transparency. The Appeals Board should decide that the request is not a “blanket” request.
Third, the failure to use redaction makes a mockery of the Bank’s vaunted “presumption of disclosure” principle. Presumption of disclosure represents the core of the Bank’s policy, as Bank officials and Bank written materials frequently attest. Redaction is the universally applied tool to maximize disclosure.

The Appeals Board should annul the AIC interpretative ruling of July 2010 that declares redaction as optional but not mandatory, and instead hold that, subject to reasonable time
constraints, redaction is mandatory. The Board should order the use of redaction in this instance if necessary to eliminate any real risks to safety and security.

**Overly Broad Application of the Safety and Security Exemption**

The asserted exception states:

> Section 12. Security and Safety
> The Bank does not provide access to:
> 
> • Information whose disclosure would compromise the security of Bank staff and their families, contractors, other individuals, and Bank assets.
>   
>   (b) Information about logistical and transport arrangements related to the Bank’s shipments of its assets and documents and the shipment of staff’s personal effects.
>   
> (c) Information whose disclosure is likely to endanger the life, health, or safety of any individual, or the environment.

The AIC decision states that the Bank “cannot reasonably discount or dismiss the possible risk of harm to the persons’ security and safety should the information be made public, nor can the Bank reasonably be expected to ascertain, in a reasonable period of time, the likelihood of such harm to each individual in each case, considering the blanket nature of this request.”

The Bank has made an overly broad interpretation of the exemption, ignoring its literal meaning. The language of the relevant portion, 12 (c), requires a finding that disclosure of information is “likely” to endanger a person’s safety security.

This choice of words indicates that there must be more than a remote possibility of endangerment. “Likely” necessitates a finding of probable harm, a good chance of harm, a real danger.

Such a finding should be based on objective evidence rather than mere speculation.

The Bank here has failed to demonstrate any such likelihood that disclosure of requester information would “endanger the life, health or safety of any individual, or the environment.” Furthermore, each request letter should be evaluated case-by-case basis. As will be addressed later, redactions can be made, if necessary, to protect specific information.

One might imagine a situation where danger is possible – perhaps where a farmer in a poor country writes to ask for evidence of corruption by a government official. On the other hand, danger would be hard to imagine in the case of the International Chamber of Commerce requesting a copy of a report.

Some elements of “personal information” may be treated differently. Arguably the release of individuals’ names is more sensitive than the release of their organizations’ names or country names.

Any finding of “likely” danger should be grounded in specific analysis. The AIC contention that it can never dismiss the possibility of risk makes a mockery of the access policy “likely” test. Common sense judgments can and should be made under the policy.

In national FOI jurisdictions, where personal privacy exemptions are applied (unlike here), requesters’ names sometimes are released, more often are not. The substance of request letters is commonly released.

The AIC argument further contends without substantiation that such decisions can’t be done in a “reasonable period of time.” This appears to be based on an unwarranted assumption that requesters must be notified. As will be noted later, FreedomInfo.org questions this assertion.
Finally, while timely responses are of course part of the Bank access policy, being unable to reply in “reasonable period of time” is not grounds for denial.

**Case Management Claim Exaggerated**
In addition, the AIC has added a new justification not cited in the initial denial letter. The AIC says the request letters might contain information about Bank staff or the Bank information case management system.
This is a problematically vague, overly broad and unsubstantiated claim.
It seems unlikely that information from the case management system would be pulled into the requested letters. Nor does it seem plausible that it would sensitive. This exception is in need of defining guidelines.
In any event, such issues could be solved easily through redaction.

**Blanket Exemption Wrongly Applied**
Mixed into the AIC’s denial on appeal is an unsupported claim that the FreedomInfo.org complaint is a blanket request.
It should be noted that this rationale was not included in the original Jan. 22 denial.
In its appeal denial, the AIC said: “The AIC found that: (a) this portion of the Request is of a blanket nature, covering all such requests for the month of October 2013, without specifying any particular case.”
In so doing, the Bank references two sections of the AI policy.
Section 24 says “should indicate, with reasonable specificity, the information that is being sought” and also says, “If a particular document is required, it should be identified precisely, preferably by date and title.”
The later clause is not applicable, so only argument can be whether the FreedomInfo.org request is reasonably specific.
Clearly it is. A single month is identified. There is no possible ambiguity about the class of documents requested. The Bank logs and identifies requests with an online monitoring system.
The AIC also relies on Paragraph 26, which says the Bank “reserves the right to refuse unreasonable or unsupported requests, including multiple requests, blanket requests, and any request that would require the Bank to create, develop, or collate information or data that does not already exist or is not available in the Bank’s records management system.”
Specifically the request at issue is termed a “blanket” request.
The policy is aimed at “unreasonable or unsupported requests.”
The FreedomInfo.org request is neither.
Bank policy does not require a statement of need for information, so it is not necessary for applicants to justify their interest in information as reasonable. Even if the Bank is unfortunately construing the policy in this direction, the FreedomInfo.org request is reasonable in many ways.
The information is valuable to Bank observers such as FreedomInfo.org and has uses that could include examining how well the Bank is executing its AI policy.
The meaning of “unsupported” is not obvious. Unsupported in what sense? One might imagine it’s designed to deal with totally irrelevant requests, which the pending request is not.
“Unsupported” is ambiguous.
Classifying this request as a “blanket” request is vague. What defines a blanket? Is there a difference between a large request and a blanket request? Would a request for all AI requests received on one day or one week be considered a blanket request? The World Bank is a large and complex organization, it cannot expect only small, “reasonable” requests.

It should be noted that the Bank makes no representation about how many requests were made in October. No specific Bank figures are currently available, but the most recent AI report says that the Bank staff received 685 during the Bank’s fiscal year ending June 30, 2013. This would suggest an average monthly request level of 57.

Is a blanket request anything over 50? 40? The blanket exemption to disclosure is wide open for discretionary abuse if the assessment made here is accepted.

The AIC decision contends that it would be “impractical” for the Bank to respond “within a reasonable period of time,” to the FreedomInfo.org’s request while also protecting personal information. Apparently the Bank’s determination about whether a request is “unreasonable” is defined by whether responding is practical and can be done promptly. The Bank’s concern with prompt responses is laudable, but the Bank’s explanation of what would make responding impractical is built on very questionable assumptions of what it would need to do.

It should be noted that such requests are commonly made, and answered, under numerous national FOIA regimes. The Bank appears to assume that it would need to notify and consult each potentially impacted individual.

The AIC rightly says “such notice and consultation are not mandated by the Policy” but wrongly moves to the conclusion that “short of such notice and inquiry, the Bank cannot reasonably discount or dismiss the possibility that the disclosure of the persons’ requests and personal information could compromise their security or safety.”

As will be argued in the next section, redaction is the perfect practical solution to uncertain situations in which personal information probably should be protected.

**Failure to Redact Subverts Core of AI Policy**

FreedomInfo.org believes the Bank is undermining the excellent presumption of disclosure principle on which the AI policy is based by failing to rely on redaction in this matter. The first of the five principles on which the Bank access policy is based is: “Maximizing access to information.”

Redaction would permit personal information to be blacked out, protecting it from disclosure, while also allowing the requester other information. This is standard operating procedure internationally, particularly for personal privacy matters. Redaction is the norm in many countries for dealing with requests for request letters. See FreedomInfo.org report on this topic. Failing to allow redaction here would make a mockery of the Bank’s presumption of disclosure.
Justifying its March 19 decision not to redact names and other personal information, the AIC cited portions of its own July 14, 2010, interpretation:

The AIC considered the “access to information requests” in their original form, recognizing that the Policy “does not mandate the Bank to redact (black out) restricted information in order to make the document acceptable for public access” (Policy interpretation on redaction, issued by the AIC on July 14, 2010).

However, the committee selectively quoted the two-sentence interpretation, leaving out the second sentence which makes redaction optional:

While the Bank does not have a redaction policy to black out restricted information in response to public access requests (meaning, documents that include restricted information are not publicly available), the Bank is not prevented from redacting restricted information on a case-by-case basis if it chooses to do so.

The option to redact should have been applied to this request.

The “not required, but you can” logic of this policy is unhelpful to Bank staff. It provides administrative discretion that has the potentially harmful consequences without giving any guidance on when to use the discretion.

The AIC’s support for the no-redaction option in its denial letter is followed in the same paragraph with the unjustified assertion that the FreedomInfo.org request is a blanket one and followed by the strawman assertion that notice and comment is required. Apparently the implication is that the option of redaction is to be employed only if convenient for the Bank.

Leaving aside how this refusal squares with the presumption of disclosure pledge, the failure to apply redaction in this instance would be very practical and not difficult.

The simplest approach, with maximum protection for requesters, would be to black out their information in the request letters, which typically are short.

Redaction is the accepted mechanism to achieve the goal of maximum disclosure while still adhering to exemptions. Redaction is essential to sensible implementation of an access policy. Redaction is absolutely standard practice at the national level.

Considering that maximum disclosure is the foundation of Bank policy, redaction should be the required option here and the AIC redaction policy should be retracted, reviewed, and reissued.

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Background Documents

WORLD BANK March 19 DENIAL LETTER

Summary of Decision

The Access to Information Committee (“AIC”) upholds the World Bank’s decision to deny access to “copies of all access to information requests” submitted in the month of October 2013. The AIC further finds the request for “any list” and “any summary” of such access to information
requests to be unsupported pursuant to the World Bank’s Access to Information Policy (“Policy”). Absent the requester’s indication of the grounds for this appeal, the AIC considered the appeal on both violation of policy and public interest grounds.

Violation of Policy. With respect to the portion of the request that seeks “copies of all access to information requests” submitted to the World Bank in October 2013, the AIC found that the World Bank had properly denied access to the records based on the Policy’s Security and Safety exception. The AIC based its decision on, inter alia, the following: (a) the “access to information requests” all included some form of personal information; (b) the persons who had submitted the requests were not notified that their information would be made public; (c) as a result, they neither consented nor had the opportunity to communicate concerns regarding such disclosure; and (d) the Bank cannot reasonably discount or dismiss the possible risk of harm to the persons’ security and safety should the information be made public, nor can the Bank reasonably be expected to ascertain, in a reasonable period of time, the likelihood of such harm to each individual in each case, considering the blanket nature of this request. With respect to the portions of the request that seek “any list” and “any summary” of such access to information requests, the AIC found that the World Bank’s written communication to the requester can be read as denying these portions of the request based on the Policy’s Security and Safety exception. In this respect, the AIC found the written communication to be in error, but the error to be harmless because: (a) the World Bank had not created and was not in possession of such list or summary; and (b) the Policy expressly reserves the World Bank’s right to refuse unsupported requests that would require the World Bank to collate or create information or data that does not already exist. As such, the World Bank’s refusal to provide information that does not already exist is reasonable and proper under the Policy.

Public Interest. The AIC dismisses consideration of the appeal on public interest grounds for the following reasons: (a) with respect to the information that is restricted by the Security and Safety exception, such information may not be subject to a public interest appeal under the Policy; and (b) with respect to the information that does not exist, technically such information is not restricted by a Policy exception and thus, there is no basis to consider a public interest appeal for the purpose of overriding a relevant Policy exception.

The Decision

1. On December 12, 2013, the requester submitted a request seeking to access: “(1) copies of all access to information requests submitted in the month of October, 2013; (2) any list of access requests in the month of October, 2013; and (3) any summary prepared by the World Bank concerning requests made in the month of October, 2013” (“Request”). On January 22, 2014, the World Bank (“Bank”) denied the Request on the basis that the information is covered by the Security and Safety exception under the Bank’s Access to Information Policy (“Policy”). On February 7, 2014, the secretariat to the Access to Information Committee received an application (“Application”) appealing the Bank’s decision to deny access to the requested information.

2. The Application asserts the following:

First, the Bank has made an overly broad interpretation of the [Security and Safety] exemption, ignoring its literal meaning.
The language of the exemption requires a finding that disclosure is “likely” to endanger a person’s safety security. This choice of words indicates that there must be more than a remote possibility of endangerment. “ Likely” necessitates a finding of probable harm, a good chance of harm, a real danger.

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Second, the exemption should not be read as a blanket justification for nondisclosure of all requester names or identifying information.

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A blanket denial is inconsistent with the language of the exemption and overall Bank policy. Application of Section 12 [of the Policy] should require a case-by-case analysis.

Third, even if the disclosure of names or personal information might expose a requester to likely harm, an alternative exists that would provide [the requester in this case] partial information while protecting the requester.

The Bank has erred by not redacting any specific information that might run afoul of Section 12 [of the Policy].

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Fourth, the Bank failed to address or justify in any way its denial of [the requester’s] requests (2) and (3).

Findings and Related Decisions

3. Absent the requester’s indication of the grounds for this appeal, the Access to Information Committee (“AIC”) considered whether the Bank’s decision to deny access to the requested information violated the Policy and whether there are public interest reasons for overriding the relevant Policy exception in this case. In reviewing the Application in accordance with the Policy, the AIC considered:

(a) the Request;
(b) the Application;
(c) the nature of the requested information and the related information provided by the relevant business unit concerned;
(d) the Policy’s Security and Safety exception that justified the Bank’s decision to deny access;
(e) the Policy interpretation concerning redaction, issued by the AIC on July 14, 2010; and
(f) the Policy’s provision on Unreasonable or Unsupported Requests.

“Violation of Policy”
4. Pursuant to the Policy, the Bank allows access to any information in its possession that is not on a list of exceptions (see Policy at paragraph 6). A requester who is denied access to information by the Bank may file an appeal if the requester is able to establish a *prima facie* case that the Bank has violated the Policy by improperly or unreasonably restricting access to information that it would normally disclose under the Policy (see Policy at paragraph 36 (a)).

5. The Policy states that the Bank “does not provide access to documents that contain or refer to information listed in paragraphs 8-17” of the Policy, which set out the Policy’s list of exceptions. Paragraph 12 of the Policy, which discusses the *Security and Safety* exception, states that the Bank does not provide access to “(a) information whose disclosure would compromise the security of Bank staff . . . other individuals, and Bank assets,” and “(c) information whose disclosure is likely to endanger the life, health, or safety of any individual” (Policy at paragraph 12). The Policy provides that “[r]equests [for information] should indicate, with reasonable specificity, the information that is being sought, to enable the Bank to locate the information within a reasonable period of time. If a particular document is required, it should be identified precisely…” (Policy at paragraph 24). The Policy, under the paragraph titled *Unreasonable and Unsupported Requests*, further provides that the Bank “reserves the right to refuse unreasonable or unsupported requests, including multiple requests, blanket requests, and any request that would require the Bank to create, develop, or collate information or data that does not already exist or is not available in the Bank’s records management system” (Policy at paragraph 26).

6. In the first portion of the Request, the requester seeks to access “copies of all access to information requests” submitted in the month of October 2013. The AIC considered the “access to information requests” in their original form, recognizing that the Policy “does not mandate the Bank to redact (black out) restricted information in order to make the document acceptable for public access” (Policy interpretation on redaction, issued by the AIC on July 14, 2010). The AIC found that: (a) this portion of the Request is of a blanket nature, covering all such requests for the month of October 2013, without specifying any particular case; (b) the “access to information requests,” as reflected in and reproduced from the Bank’s access to information case management system, all include some form of personal information such as names, email addresses and personal and/or professional affiliations; (c) the members of the public who had submitted the access to information requests were given no notice that their requests and personal information would be publicly released; (d) as a result, the persons neither consented nor had reasonable opportunity to communicate any security and safety concerns relating to such disclosure; (e) international codes of ethics and codes of conduct for archivists recognize the need to respect the privacy of users, including maintaining the confidentiality of their research and protecting their personal information; (f) in order to ascertain with certainty the level of risk posed to the requesters’ security and safety if their personal information was to be released, the Bank would need to notify and seek the views of each individual impacted by the disclosure, which means, at minimum, contacting and getting the views of each person who had submitted an access to information request in the month of October 2013; (g) in view of the blanket nature of the Request, it would be impractical for the Bank to address this portion of the Request within a reasonable period of time, should the Bank need to notify and consult each potentially impacted individual, noting that such notice and consultation are not mandated by the Policy; and (h) short of such notice and inquiry, the Bank cannot reasonably discount or dismiss the possibility that the disclosure of the persons’ requests and personal information could compromise their security or safety. Under the circumstances, the AIC found the Bank had acted...
reasonably and in the spirit of the Policy, by giving due regard to the security and safety of those persons who had submitted an access to information request to the Bank.

7. Additionally, the AIC found that “access to information requests” reproduced from the Bank’s access to information case management system also reveal information about Bank staff (e.g., staff names) and the Bank’s information technology systems. Thus, while the Bank’s communication to the requester only indicated the *Security and Safety* exception (which may also apply to Bank staff and assets), the AIC finds that *Corporate Administrative Matters* exception is also triggered.

8. On the basis of the considerations discussed above, the AIC found that the Bank properly and reasonably denied the request for “copies of all access to information requests” submitted to the Bank in the month of October 2013.

9. With respect to the latter two portions of the Request that seeks any “list of access requests in the month of October, 2013” and “summary prepared by the World Bank concerning requests made in the month of October, 2013,” the AIC noted that the Bank’s denial to requester indicated, in relevant part, that “the information you requested is restricted from public access under the [Policy] because it is covered by the *Security and Safety* exception.” The denial made no distinction between the different information requested. The business unit communicated to the AIC that, while the written denial only referred to the *Security and Safety* exception, the business unit had verbally informed the requester that the requested list and summary do not exist, and of the provision in the Policy concerning unsupported requests.

10. The AIC found that, based solely on the face of the written denial, the Bank’s response may be read as denying the whole Request based on the Policy’s *Security and Safety* exception. While the AIC found that denying the latter two portions of the Request on this basis would be in error, the AIC found the error to be harmless because: (a) there is no evidence of the existence of such a list or summary; and (b) the Policy expressly reserves the Bank’s right to refuse requests that would require it to create, develop or collate information or data that does not already exist or is available in its records management system.

11. Based on all the above findings, the AIC concluded that the Bank’s decision did not violate the Policy and upheld its decision to deny public access to the requested information in existence. Under the Policy, if the AIC upholds the initial decision to deny public access to information in appeals alleging “violation of policy,” the requester can appeal to the Access to Information Appeals Board ("AI Appeals Board") as the second and final stage of appeals (see paragraph 38 of the Policy). If you wish to file an appeal to the AI Appeals Board, click here, or copy past the following URL into your browser: https://lnweb90.worldbank.org/devcom/trackingsystem/queries.nsf/ContactAppeals?OpenForm&casenumber=AI3127-B&st=2

"Public Interest" case

12. Pursuant to the Policy, a requester who is denied access to information by the Bank may file an appeal on a “public interest” basis if the requester is able to make a public interest case to override certain Policy exceptions that restrict the information requested. Public interest appeals are limited to information restricted under the *Corporate Administrative Matters*, *Deliberative Information*, and *Financial Information* (other than banking and billing information) exceptions
13. In the absence of the requester’s indication of the grounds for this appeal, the AIC considered the appeal on public interest grounds. With respect to the “access to information requests” sought by the requester, the AIC found that, because such information is restricted by the Policy’s Security and Safety exception, the information is not subject to a public interest appeal (see Policy at paragraph 36). With respect to the requested “list” and “summary” of such public access requests, because such information does not exist, the AIC found that this portion of the appeal cannot be considered on public interest grounds. The AIC also found that the Request provided no information in support of a public interest appeal that would result in a different conclusion. For these reasons, the AIC dismisses consideration of the appeal on public interest grounds (see Policy at paragraph 40 (c)). Under the Policy, the decision of the AIC is final for appeals that assert a public interest case to override a Policy exception (see Policy at paragraph 37).

14. While the Bank has not, at the time of this appeal, adopted a practice of creating any lists or summaries of access to information requests, the AIC notes that the relevant business units concerned are considering the piloting of a system to disclose certain information from the access to information requests filed by the public. The AIC supports the business units’ consideration of such an initiative, in furtherance of the Policy’s guiding principle to maximize the public’s access to information, so long as: (a) the members of the public are notified, in advance of submitting their information requests, that certain information from their requests may be disclosed; and (b) due consideration is given to any request for confidentiality.

FREEDOMINFO.ORG Feb. 7 appeal letter
FreedomInfo.org is appealing the decision by World Bank staff of its Dec. 12, 2013, request (AI3127) for:
• Copies of all access to information requests submitted in the month of October, 2013.
• Any list of access requests in the month of October, 2013.
• Any summary prepared by the World Bank concerning requests made in the month of October, 2013.

The Bank on Jan. 22, 2014, replied:

In response to your request under AI3127, please be informed that the information you requested is restricted from public access under the World Bank’s Access to Information Policy (the Policy) because it is covered by the Security and Safety exception under the Policy (please see para. 12 (c) of the Policy).

The relevant exception states:

Section 12. Security and Safety
The Bank does not provide access to:
• Information whose disclosure would compromise the security of Bank staff and their families, contractors, other individuals, and Bank assets.
  (b) Information about logistical and transport arrangements related to the Bank’s shipments of its assets and documents and the shipment of staff’s personal effects.
• Information whose disclosure is likely to endanger the life, health, or safety
FreedomInfo.org appeals this interpretation on a number of grounds.

First, the Bank has made an overly broad interpretation of the exemption, ignoring its literal meaning.

The language of the exemption requires a finding that disclosure is “likely” to endanger a person’s safety security. This choice of words indicates that there must be more than a remote possibility of endangerment. “Likely” necessitates a finding of probable harm, a good chance of harm, a real danger.

Such a finding should be based on objective evidence. The Bank here has failed to demonstrate any such likelihood that disclosures of requester information would “endanger the life, health or safety of any individual, or the environment.”

One might imagine a situation where danger is possible – a farmer in a poor country writing to ask for evidence of corruption by a government official. On the other hand, danger would be hard to imagine in the case of the U.S. Chamber of Commerce requesting a copy of a report.

Any finding of “likely” danger should be grounded in specific analysis.

Second, the exemption should not be read as a blanket justification for nondisclosure of all requester names or identifying information.

Making distinctions is essential under the language of the exemption in order to fulfill the overall premise of the Access to Information policy that presumes disclosure of information.

Among other distinctions, decisions about releasing the elements of personal information may be different. Arguably the release of personal names is more sensitive than the release of organization names, street addresses or country names.

A blanket denial is inconsistent with the language of the exemption and overall Bank policy.

Application of Section 12 should require a case-by-case analysis.

Third, even if the disclosure of names or personal information might expose a requester to likely harm, an alternative exists that would provide FreedomInfo.org partial information while protecting the requester.

The Bank has erred by not redacting any specific information that might run afoul of Section 12.

Redaction is the accepted mechanism to achieve the goal of maximum disclosure while still adhering to the exemptions in the policy. Redaction is essential to sensible implementation of an access policy. Redaction is absolutely standard practice at the national level.

In particular, redaction is the norm in many countries for dealing with requests for request letters. See FreedomInfo.org report:

http://www.freedominfo.org/2014/01/disclosure-request-letters-handled-different-ways/

For example, the Bank could disclose the substance of the requesters’ letters – what information they requested – without identifying information that might violate Section 12.

A refusal to make redactions would very seriously undermine the AI policy without any possible justification.

Fourth, the Bank failed to address or justify in any way its denial of FreedomInfo.org’s requests (2) and (3).

Sincerely,

Toby McIntosh

FreedomInfo.org