FREEDOM OF INFORMATION COMMISSION
OF THE STATE OF CONNECTICUT

In the Matter of a Complaint by FINAL DECISION

Aaron Ravenberg,

Complainant

against Docket #FIC 2023-0382

Human Resources Director, State of Connecticut, Military Department; Adjutant General, State of Connecticut, Military Department; and State of Connecticut Military Department,

Respondents July 10, 2024

The above-captioned matter was heard as a contested case on November 28, 2023, at which time the complainant and the respondents appeared, stipulated to certain facts, and presented testimony, exhibits, and argument on the complaint. A continued hearing was held on February 21, 2024, at which time the complainant and respondents appeared and provided additional testimony and argument on the complaint.

After consideration of the entire record, the following facts are found and conclusions of law are reached.

1. The respondents are public agencies within the meaning of § 1-200(1), G.S.

2. It is found that by email dated Saturday, July 8, 2023, the complainant submitted a Freedom of Information ("FOI") request[1] to the respondents seeking:

a. all communications and documents referring to or concerning Aaron Ravenberg or Joseph Haney to include communications in reference to, but not limited to the following individuals:

MG Francis J Evon
BG Ralph F. Hedenberg
Timothy J Tomcho
Russell Bonaccorso
Catriana Hersey

[1] Hereinafter, the July 8th Request

Jaelle Hersey
Victoria Haskins
Michael Morris

b. MCUB records and notes for the period June 2022 through June 2023

3. It is found that on Monday, July 10, 2023, the respondents replied to the complainant acknowledging his request and advising that email communications not utilizing a state-issued email address cannot be retrieved unless the email was sent to a state-issued email address from an outside account. It is found that the respondents also informed the complainant that Governor's Horse and Foot Guard members are not issued state email accounts.

4. It is found that on July 24, 2023, the complainant sent a follow-up email to the respondents inquiring as to the status of his July 8th request.

5. By letter of complaint dated July 24, 2023, the complainant appealed to this Commission alleging that the respondents had not provided the records sought in his July 8th request within 10 business days. In his appeal, the complainant alleged that the respondents had "a vested interest in not supplying the [requested records] in a timely manner, as it may reveal information supporting [the complainant's CHRO case]."

6. Section 1-200(5), G.S., provides:

> '[p]ublic records or files' means any recorded data or information relating to the conduct of the public's business prepared, owned, used, received or retained by a public agency, or to which a public agency is entitled to receive a copy by law or contract under section 1-218, whether such data or information be handwritten, typed, tape-recorded, videotaped, printed, photostated, photographed or recorded by any other method.

7. Section 1-210(a), G.S., provides, in relevant part, that:

> [e]xcept as otherwise provided by any federal law or state statute, all records maintained or kept on file by any public agency, whether or not such records are required by any law or by any rule or regulation, shall be public records and every person shall have the right to (1) inspect such records promptly during regular office or business hours, (2) copy such records in accordance with subsection (g) of section 1-212, or (3) receive a copy of such records in accordance with section 1-212.

8. Section 1-212(a), G.S., provides, in relevant part, that "[a]ny person applying in writing shall receive, promptly upon request, a plain facsimile, electronic or certified copy of any public record."

9. It is concluded that the records described in paragraph 2, above, are public records within the meaning of §§1-200(5) and 1-210(a), G.S.

10. As found in paragraph 2, above, the complainant submitted his request on Saturday July 8, 2023, and the respondents received and acknowledged his request on Monday, July 10, 2023.

11. It is found that during the period of July 12, 2023 through August 8, 2023, the respondents' Human Resources (HR) Generalist 3/FOIA Manager coordinated with the State's Bureau of Information Technology Solutions (BITS) to retrieve and compile records responsive to the complainant's request.

12. It is found that on July 26, 2023, the respondents informed the complainant that they were processing the request and that "[t]he request will require a reasonable period of time for [the respondents] to identify, retrieve, compile and duplicate any responsive records."

13. It is found that on August 8, 2023, the respondents finished retrieving records from BITS and the respondents' Paralegal Specialist compiled the records received from BITS, reviewed such records to ensure compliance with the complainant's request, reviewed and redacted the contents of such records, created a privilege log identifying such redactions for the complainant, and finalized such records for disclosure to the complainant.

14. It is found that on August 23, 2023, the complainant again emailed the respondents asking for an update concerning his July 8th request.

15. It is found that the respondents completed processing the complainant's request on August 28, 2023. It is further found that the respondents disclosed over 700 pages of records to the complainant via a sharable Microsoft OneDrive folder on August 29, 2023, along with a log indicating the redactions by page.

16. It is found that as part of their August 29, 2023 disclosure, described in paragraph 15, above, the respondents withheld or made redactions to 24 pages of records citing the invasion of privacy, preliminary drafts and notes, and attorney-client privilege exemptions to disclosure under the FOI Act.

17. Pursuant to an order of the hearing officer, the respondents submitted the withheld or redacted records described in paragraph 16, above, for in camera inspection on January 19, 2024. Such records shall be referred to as ICR 2023-0382-001 through ICR 2023-0382-024.

18. The respondents assert that the following portions of the in camera records are exempt from disclosure as their release would constitute an invasion of personal privacy within the meaning of §1-210(b)(2), G.S.: ICR 2023-0382-001 (line 36); ICR 2023-0382-002 (lines 10-

29); ICR 2023-0382-003 (lines 10-28); ICR 2023-0382-004 (line 36); ICR 2023-0382-005 (line 5); ICR 2023-0382-006 (line 37); ICR 2023-0382-007 (line 5); ICR 2023-0382-008 (lines 11-29); ICR 2023-0382-009 (lines 10-28); ICR 2023-0382-010 (line 6); ICR 2023-0382-011 (line 5); ICR 2023-0382-018 (line 3); ICR 2023-0382-019 (lines 4, 10-12); ICR 2023-0382-020 (line 37); ICR 2023-0382-021 (lines 16-17).

19. At the February 21, 2024 continued hearing, complainant's counsel indicated that they were not contesting any redactions made by the respondents pursuant to §1-210(b)(2), G.S., as an invasion of personal privacy; therefore, the records identified in paragraph 18, above, will not be considered further herein.

20. Next, the respondents assert that ICR 2023-0382-016-017 is exempt from disclosure pursuant to §1-210(b)(1), G.S. (i.e., the preliminary drafts and notes exemption).

21. Section 1-210(b)(1), G.S., permissively exempts from disclosure "[p]reliminary drafts or notes provided the public agency has determine that the public interest in withholding such documents clearly outweighs the public interest in disclosure."

22. Section 1-210(b)(1), G.S., requires the respondents to show that they determined that the public interest in withholding records clearly outweighs the public interest in disclosure: "The statute's language strongly suggests that the agency may not abuse its discretion in making the decision to withhold disclosure and those reasons must not be frivolous or patently unfounded." Van Norstrand v. Freedom of Info. Comm'n, 221 Conn. 339, 345 (1989).

23. In 1980, the Connecticut Supreme Court interpreted the phrase "preliminary drafts and notes" in the FOI Act. See Wilson v. Freedom of Info. Comm'n, 181 Conn. 324 (1980) ("Wilson"). The Wilson court ruled that "preliminary drafts and notes reflect that aspect of an agency's function that precedes formal and informal decision making. . . .It is records of this preliminary, deliberative, and predecisional process that. . . the exception was meant to encompass." Wilson, 181 Conn. at 332. In addition, the Wilson court interpreted the phrase "preliminary drafts and notes" in the FOI Act as identical to the deliberative process privilege found in 5 U.S.C. §552(b)(5) of the federal Freedom of Information Act, with the exception that, under Connecticut's FOI Act, the public agency carried the additional burden to show that the "public interest in withholding such document clearly outweighs the public interest in disclosure." See Wilson, 181 Conn. at 333-340.

24. The year following Wilson, the Connecticut General Assembly passed Public Act, 81-431, which added to the FPO Act the language now codified in §1-210(e)(1), G.S. That provision, which narrowed the exemption for preliminary drafts or notes, provides in relevant part:

> [n]otwithstanding [§1-210(b)(1)], disclosure shall be required of:
>
> [i]nteragency or intra-agency memoranda, letters, advisory opinions, recommendations or any report comprising part of the

> process by which governmental decisions and policies are formulated, except that disclosure shall not be required of a preliminary draft of a memorandum, prepared by a member of staff of a public agency, which is subject to revision prior to submission to or discussion among the members of such agency. . . .

25. Accordingly, §§ 1-210(b)(1) and 1-210(e)(1), G.S., together, permit the nondisclosure of an agency's preliminary, predecisional, deliberative process, provided that the agency has determined that the public interest in withholding such records clearly outweighs the public interest in disclosing them, and provided further that such records are not interagency or intra-agency memoranda or letters, advisory opinions, recommendations, or reports. See Shew v. Freedom of Info. Comm'n, 245 Conn 149, 164-166 (1998).

26. The respondents testified that ICR 2023-0382-016-017 is a preliminary draft and note as it was not finalized and contained handwritten notes relating to typographical errors such as grammar, missed punctuation and spelling.

27. Upon careful inspection of ICR 2023-0382-016-017, it is found that such record contains the "typical hallmarks of a preliminary draft, such as typographical errors, handwritten corrections or comments, or missing sections to be filled in later." See Docket #FIC 1992-139, Martha Stone et. al. v. State of Connecticut Dept. of Mental Health (August 11, 1993).

28. It is further found that the respondents conducted the public interest analysis required by § 1-210(b)(1), G.S., and determined that the public interest in withholding such documents clearly outweighed the public interest in disclosure. Specifically, the respondents testified that in balancing the public's interest, the agency ultimately determined that withholding the draft records outweighed the public's interest in disclosure because: (i) the draft document reflected the deliberative "back and forth" and collaborative process of the agency; and (ii) a final version of the record existed and was produced to the complainant.

29. Additionally, it is found that ICR 2023-0382-016-017 is not a inter/intra-agency memorandum or letter, and advisory opinion, recommendation, or report within the meaning of §1-210(e), G.S.

30. Accordingly, it is concluded that ICR 2023-0382-016-017 is permissively exempt from disclosure pursuant to § 1-210(b)(1), G.S., and the respondents did not violate the FOI Act when they did not disclose such record to the complainant.

31. The respondents also claim that the following portions of the in camera records are exempt from disclosure pursuant to §1-210(b)(10), G.S., specifically the attorney-client privilege: ICR 2023-0382-012 (lines 7-30); ICR 2023-0382-013 (lines 6-9); ICR 2023-0382-014 (lines 7-28); ICR 2023-0382-015 (lines 7-8); ICR 2023-0382-022 (lines 7-8); ICR 2023-0382-023 (lines 7-28); and ICR 2023-0382-024 (lines 6-14).

32. Section 1-210(b)(10), G.S., provides in relevant part that nothing in the FOI Act shall require disclosure of "communications privileged by the attorney-client relationship. . . ."

33. The applicability of the exemption contained in §1-210(b)(10), G.S., is governed by established Connecticut law defining the privilege. That law is well set forth in Maxwell v. FOI Commission, 260 Conn. 143 (2002) ("Maxwell"). In that case, the Supreme court stated that §52-146r, G.S., which establishes a statutory privilege for communications between public agencies and their attorneys, merely codifies "the common-law attorney-client privilege as this court previously had defined it." Id., 149.

34. Section 52-146r, G.S., defines "confidential communications" to mean:

> all oral and written communications transmitted in confidence between a public official or employee of a public agency acting in the performance of his or her duties or within the scope of his or her employment and a government attorney relating to legal advice sought by the public agency or public official or employee of such public agency from that attorney, and all records prepared by the government attorney in furtherance of the rendition of such legal advice.

35. Section 52-146r, G.S., prohibits disclosure of confidential communications between a government attorney and a public official or employee of a public agency and provides, in relevant part, that:

> [i]n any civil or criminal case or proceeding or in any legislative or administrative proceeding, all confidential communications shall be privileged and a government attorney shall not disclose any such communications unless an authorized representative of the public agency consents to waive the privilege and allow such disclosure.

36. The Supreme Court has also stated that "both the common-law and statutory privilege protect those communications between a public official or employee and an attorney that are confidential, made in the course of the professional relationship that exists between the attorney and [their] public agency client, and relate to the legal advice sought by the agency from the attorney." Maxwell, at 149.

37. The Commission recognizes that "[w]here legal advice of any kind is sought from a professional legal adviser in his capacity as such, the communications relating to that purpose, made in confidence by the client, are at his instance permanently protected from disclosure by himself or by the legal adviser, except the protection [may] be waived." Rienzo v. Santangelo, 160 Conn. 391, 395 (1971).

38. The complainant argues that the respondents improperly withheld records, or portions thereof pursuant to the attorney-client privilege for two reasons. First, the complainant argues that the privilege does not extend to communications from an attorney to their client, if there was no request for advice from the client. Second, the complainant argues that the

respondents improperly withheld communications, the substance of which were unrelated to legal advice.

39. The complainant's first argument is unpersuasive. The complainant cites no legal authority for the premise that the attorney-client privilege applies only when the client proactively or overtly asks advice from their attorney. Rather, the complainant's entire argument rests on the phrase "relating to legal advice ***sought*** by the public agency. . ." in §52-146r, G.S.

40. In fact, case law dictates that "[i]n Connecticut, the attorney-client privilege protects both ***the confidential giving of professional advice by an attorney*** acting in the capacity of the legal advisor to those who can act on it, as well as the giving of information to the lawyer to enable counsel to give sound and informed advice." (Emphasis added.) Olson v. Accessory Controls and Equipment Corp., 254 Conn. 145, 157 (2000).

41. Moreover, the purpose of the attorney-client privilege is to "foster full and frank communications between attorneys and their clients and thereby promote[s] the broader public interests in the observation of law and [the] administration of justice." (Internal quotation marks omitted) Id. Requiring an attorney to wait to provide legal advice until their client expressly asks for it would entirely undermine the purpose of the privilege.

42. With respect to the complainant's second argument, the Connecticut Supreme Court has long recognized the principle that not every communication between attorney and clients falls within the attorney-client privilege. Harrington v. Freedom of Info Comm'n, 323 Conn. 1, 14 (2016). For instance, "[t]he communication must be made by the client to the attorney acting as an attorney and not, e.g. as a business advisor. . . . In sum, attorneys do not act as lawyers when not primarily engaged in legal activities." Id., at 15.

43. Furthermore, "[w]hen the legal aspects of the communication are incidental or subject to separation, the proponent of the privilege may be entitled to redact those portions of the communication. . . . When such separation is not possible, both may be redacted, as long as the primary purpose is legal advice." Id., at 18-19.

44. Accordingly, the Commission must review the in camera records identified in paragraph 31, above, and determine what portions of such records, if any, consist of communications wherein the attorney is acting in their capacity as an attorney and is primarily engaged in legal activities.

45. After careful review of the in camera records, it is found that the following portions of such records identified in paragraph 31, above, consist of attorney client communications in that such communications were: (i) between an attorney (i.e., an attorney acting in his capacity as an attorney for the respondents) and a client (i.e., the respondents); (ii) related to legal advice; and (iii) made in confidence: ICR 2023-0382-012 (lines 7-30); ICR 2023-0382-013 (lines 7 (after the period) – 9); ICR 2023-0382-014 (lines 7-13, 14 (after the second period) - 28); ICR 2023-0382-015 (lines 7 (after the period) – 8 (up to the first period)); ICR 2023-0382-022 (lines 7 (after the period) – 8 (up to the first period); ICR 2023-0382-023 (lines 7-13, 14 (after the second period - 28); ICR 2023-0382-024 (lines 6-9 (up to the first period), 11 (after the period – 12 (up to the period), 13 (after the period) - 14).

46. It is further found that the respondents have not waived the attorney-client privilege with respect to those portions of the in camera records identified in paragraph 45, above, and therefore, such records were properly withheld pursuant to §1-210(b)(10), G.S.

47. Accordingly, it is found that the following portions of the in camera records do not consist of attorney-client privileged communications and were, therefore, improperly withheld by the respondents: ICR 2023-0382-013 (lines 6 – 7 (up to the period)); ICR 2023-0382-014 (line 14 (up to the second period)); ICR 2023-0382-015 (line 7 (up to the period)); ICR 2023-0382-022 (line 7 (up to the period)); ICR 2023-0382-023 (line 14 (up to the second period)); ICR 2023-0382-024 (lines 9 (after the period) – 11 (up to the period), 12 (after the period) – 13 (up to the period)).

48. The complainant next argues that the documents provided by the respondents as part of their August 29 disclosure did not include all responsive documents.

49. At the November 28, 2023 hearing, the complainant testified that he was "aware" of several records that should have been disclosed as responsive to his request, but were not.

50. It is found that the complainant described one such record as a June 2022 email among members of the respondent Military Department that allegedly concerned him.[2] It is found that the complainant was not a party to the June 2022 email (i.e., he was neither the sender/recipient of the email, nor was he copied on it). Rather, it is found that the complainant became aware of such email through a third party who submitted a separate FOI request to the respondents.

51. The complainant testified that the June 2022 email involved his brother Dana Ravenberg, and the email itself refers to Dana Ravenberg's brother (i.e., the complainant), and therefore, the record pertains to the complainant and should have been disclosed to him in response to his July 8th request. The complainant argued that the respondents should have used the search term "Ravenberg" when searching for responsive records.

52. The Commission notes that the respondents did, in fact, conduct a search using the term "Ravenberg." See Respondents' Exhibit 2, Bates Stamp 221.

53. Furthermore, in Wildin v. Freedom of Info. Comm'n, 56 Conn. App. 683 (2000), the Appellate Court held that a public agency is not required to conduct research in order to respond to a request for public records. The court explained that a request requires research if it does not properly identify the records sought, such that the agency must conduct an analysis or exercise discretion to determine which records fall within the scope of the request. Id. at 686 – 87.

54. The respondents' witness who reviewed the responsive records testified, and it is found that when he reviewed the records, he was aware that Aaron Ravenberg and Dana

[2] The Commission takes administrative notice of the fact that the email in question (i.e., Complainant's Exhibit K) was admitted into evidence in a separate matter currently pending before this Commission, specifically, Docket #FIC 2023-0391, Dana Ravenberg v. Human Resources Director, State of Connecticut, Military Department; Adjunt General, State of Connecticut, Military Department; and State of Connecticut, Military Department. The Commission takes administrative notice that what has been admitted into evidence in this matter as Complainant's Exhibit K, is included as part of Respondent's Exhibit 2 in Docket #FIC 2023-0391.

Ravenberg were related but was not familiar with the exact nature of that relationship. The respondents' witness further testified and it is found that understanding familial relationships between different individuals was not part of his job function, nor is it something he looks for in reviewing responsive records for FOI requests.

55. It is found that although the June 2022 email may have pertained to the complainant, it only referred to "Brother Ravenberg." It is therefore found that to reach the conclusion that the June 2022 email referred to or concerned the complainant (and, thus, identify such record as responsive to the complainant's request), the respondents would have had to conduct a separate analysis to determine and confirm that not only were Aaron and Dana Ravenberg related, but that Aaron Ravenberg was Dana Ravenberg's brother.

56. It is found that such analysis, as described in paragraph 55, above, falls within the meaning of "research" as defined by the Court in Wildin.

57. Accordingly, it is concluded that the respondents did not violate the FOI Act by not searching for and identifying records which, may have pertained to the complainant, but only included reference to "Brother Ravenberg" or similar terms, as doing so would have required research to identify such records as responsive to the complainant's request.

58. It is found that after the November 28, 2023 hearing, the respondents, on their own initiative, conducted an additional search to determine if any records were inadvertently missed in their initial disclosure.

59. It is found that upon reviewing the complainant's request, the respondents determined that their initial search improperly limited the scope of records to the period of June 2022 through June 2023. It is found the respondents inadvertently applied the limited timeframe of the second portion of the July 8th request described in paragraph 2.b., above, to the entire request, even though the first part of the request (i.e., paragraph 2.a.) contained no such temporal limitation.

60. It is found that, upon realization of such error, the respondents expanded the search window of their search to May 6, 2021, the date the 2nd Company Governor's Horse Guard requested the complainant's enlistment.

61. It is found that the respondents' follow-up search produced additional records which the respondents disclosed to the complainant on January 30, 2024.[3]

62. It is found that the respondents' error concerning the time frame used for their initial search resulted in their failure to produce records responsive to the complainant's request.

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[3] The Commission notes that after the complainant described the June 2022 email at the November 28, 2023 hearing, the respondents provided such record to the complainant in their supplemental disclosure. The Commission further notes, however, that the respondents were not obligated to provide such record as, at the time of the request, identifying such record as responsive would have required research for the reasons set forth in paragraphs 47-51, above.

63. Finally, the Commission notes that in the respondents' reply to the complainant's FOI request, the respondents indicated that their response would not include email correspondence conducted using non-state issued emails, thus potentially excluding email communications of Governor's Horse and Foot Guard members.

64. Commission precedent makes clear that the use of a personal email address does not shield a record from disclosure "if the content of the email relates to the conduct of the public's business." (Emphasis in original) Docket #FIC 2014-309, Joe Wojtas and the New London Day v. Information Technology Director, Town of Stonington; First Selectman, Town of Stonington; and Town of Stonington.

65. It is found that although the complainant's request, described in paragraph 2, above, listed specific individuals for whom to search records, that list was not exhaustive. It is therefore found that members of the Governor's Horse and Foot Guard were reasonably included in the subset of individuals who might have responsive records, despite their use of personal email addresses to conduct public business.

66. It is further found that the respondents did not attempt to inquire and/or request that individuals who use their personal email addresses to conduct public business search for responsive documents.

67. Based on the facts and circumstances of this case, and specifically the findings in paragraphs 63 through 66, above, it is found that the respondents failed to prove that they provided all responsive documents to the complainant.

68. Accordingly, it is concluded that the respondents violated §§ 1-210(a) and 1-212(a) G.S. Nevertheless, the Commission recognizes that the respondents acted in good faith when processing the complainant's July 8th request, by quickly and proactively working to remedy errors once identified.

The following order by the Commission is hereby recommended on the basis of the record concerning the above-captioned complaint:

1. Within seven (7) days of the notice of final decision in this matter, the respondents shall provide the complainant with copies of those portions of the in camera records described in paragraph 47 above, unredacted and free of charge.

2. Within fourteen (14) days of the notice of final decision in this matter, the respondents shall request that any employee who uses a personal email account to conduct official business on behalf of the respondents conduct a search of such personal emails and determine if they maintain any records responsive to the complainant's request, as described in paragraph 2 of the findings, above.

3. Within twenty-one (21) days of requesting the supplemental search from employees as described in paragraph 2 of the order, above, the respondents shall submit an affidavit to the Commission, via email at foi@ct.gov, with copy to the complainant. Such affidavit shall describe: (i) how many employees it asked to conduct the supplemental search; (ii) how many employees responded to such request; (iii) of those employees that responded, how many

maintained responsive records on behalf of the respondents; (iv) whether any supplemental records provided by employees are exempt from disclosure, and if so, on what legal basis; (v) how long it will take the respondents to review and disclose any records they received as a result of the supplemental search; and (vi) the respondents' efforts to follow up with employees who did not respond to the respondents" request.

4. If the respondents fail to comply with any of the timelines set in paragraphs 1 through 3 of this order, or the complainant takes issue with any record, or portion thereof, withheld by the respondents as a result of the supplemental search ordered in paragraph 3, above, the complainant may file an appeal with the Commission and such appeal will be afforded expedited treatment.

5. Any record discovered as a result of the supplemental search for which no exemption to disclosure applies, and not previously disclosed to the complainant, shall be disclosed to the complainant promptly, unredacted and free of charge.

6. Henceforth, the respondents shall strictly comply with the disclosure provisions of §§ 1-210(a) and 1-212(a) G.S.

Approved by Order of the Freedom of Information Commission at its regular meeting of July 10, 2024.

Jennifer M. Mayo
Acting Clerk of the Commission

PURSUANT TO SECTION 4-180(c), G.S., THE FOLLOWING ARE THE NAMES OF EACH PARTY AND THE MOST RECENT MAILING ADDRESS, PROVIDED TO THE FREEDOM OF INFORMATION COMMISSION, OF THE PARTIES OR THEIR AUTHORIZED REPRESENTATIVE.

THE PARTIES TO THIS CONTESTED CASE ARE:

AARON RAVENBERG, c/o Attorney Stephen E. Nevas, Nevas Law Group, LLC, 237 Post Road West, Westport, CT 06880

HUMAN RESOURCES DIRECTOR, STATE OF CONNECTICUT, MILITARY DEPARTMENT; ADJUTANT GENERAL, STATE OF CONNECTICUT, MILITARY DEPARTMENT; AND STATE OF CONNECTICUT, MILITARY DEPARTMENT, c/o State Judge Advocate Timothy J. Tomcho, Military Department, Governor William A. O'Neill Armory, 360 Broad Street, Hartford, CT 06105

Jennifer M. Mayo
Acting Clerk of the Commission

FIC 2023-0382/FD/JMM/July 10, 2024