



**OFFICE OF THE INFORMATION & PRIVACY COMMISSIONER  
of  
Prince Edward Island**

**Order No. FI-23-002**

**Re: Department of Finance**

**May 16, 2023**

**Maria C. MacDonald  
Deputy Commissioner**

**Summary:** In 2019, an applicant requested access to some of the Minister's records for a six-month period in 2011. The Applicant did not believe the Public Body had conducted a reasonable search, because there were no Blackberry messages, texts, notes, or calendar entries among the responsive records. The Applicant also did not believe the head of the Public Body responded to them openly, accurately, and completely, because they did not advise the Applicant that there were gaps in the Minister's email archives.

The Deputy Commissioner agreed with the Applicant that the Public Body had not conducted an adequate search. The Public Body searched the Minister's email account but did not search hard copy records. The Deputy Commissioner did not find that the head of the Public Body knew there were gaps in the Minister's email archives during the six-month period of the access request. Therefore, the Deputy Commissioner did not find the head of the Public Body failed to respond to the Applicant openly, accurately and completely.

During the review, the Applicant asked for the specific dates of the gaps of the email of the Minister. The Deputy Commissioner did not require the Public Body to research the time periods of the gaps, but recommended the Public Body give the Applicant the time periods of what they referred to as inactivity.

**Statutes considered:**

*Freedom of Information and Protection of Privacy Act*, R.S.P.E.I. 1988, c F-15.01,  
subsection 8(1)

**Decisions considered:**

Order FI-20-007, *Re: Department of Economic Growth, Tourism and Culture*, 2020 CanLII 43897 (PE IPC)

Report A-2018-020, *Re: Premier's Office*, 2018 CanLII 82313 (NL IPC)

Order FI-11-001, *Re: Department of Agriculture*, 2011 CanLII 91839 (PE IPC)

Order FI-22-005, *Re: Health PEI*, 2022 CanLII 83333 (PE IPC)

**Other sources:**

Transcript of the hearings of 14 October 2020, and 16 September 2020 before the Special Committee of the Legislative Assembly on Government Records Retention

A letter dated 16 October 2020 from the Secretary of Treasury Board to the Special Committee of the Legislative Assembly on Government Records Retention

**I. BACKGROUND**

- [1] An individual (the “Applicant”) made an access request to the Department of Finance (the “Public Body”) for:

All records, in any formats, electronic or otherwise, of [named person who was a former Minister of Finance and Municipal Affairs] which were either sent to – or received from – [a named person who was a former Chief of Staff], or make mention of [named, private business person] from May 1, 2011 to November 1, 2011.

- [2] I will refer to the person who was a former Minister of Finance and Municipal Affairs in 2011 as the “Minister”. The person who was a former Chief of Staff was in this role for most of the six-month period of the access request but also held another position. For ease of reference, I will refer to this person as the “Chief of Staff”.

- [3] The Public Body located and retrieved 42 pages of responsive records. The Applicant requested a review about the adequacy of the Public Body's search because the responsive records were only email records. Former Commissioner Rose requested and received submissions from both the Public Body and the Applicant about the adequacy of the Public Body's search but did not complete this matter before the end of her term. The matter passed to her successor, Commissioner Doiron.
- [4] The Applicant obtained evidence that there were gaps in the Minister's email archives between January 1, 2010 and March 31, 2015. Commissioner Doiron requested further submissions from the Public Body about the gaps in the Minister's email archives, and both the Public Body and the Applicant provided submissions on this evidence.
- [5] On March 16, 2023, Commissioner Doiron delegated this matter to me to complete the review and issue a decision.

## **II. ISSUE**

- [6] The issue in this review is whether the head of the Public Body fulfilled their duty to an applicant under subsection 8(1) of the *FOIPP Act*, which states:

8(1) The head of a public body shall make every reasonable effort to assist applicants and to respond to each applicant openly, accurately and completely.

- [7] The Applicant's two concerns are about:
- a. the adequacy of the Public Body's search; and
  - b. the gaps in the Minister's email archives.

### **III. BURDEN OF PROOF**

- [8] Subsection 8(1) of the *FOIPP Act* establishes the duty of public bodies to assist applicants, and to respond to applicants openly, accurately and completely. These duties are mandatory. Although an applicant must have a basis for requesting a review of a public body's duties, the burden of proof under subsection 8(1) of the *FOIPP Act* lies with the public body [Order FI-20-007, *Re: Department of Economic Growth, Tourism and Culture*, 2020 CanLII 43897 (PE IPC), at paragraph 6].
- [9] Subsection 8(1) of the *FOIPP Act* refers to reasonable efforts, so the standard in assessing whether a public body has satisfied their duties is whether the Public Body's efforts were reasonable in the circumstances.

### **IV. ANALYSIS**

#### **Issue 1: Adequate Search**

- [10] The Public Body gave our office copies of records they created at the time of the searches, and the former Commissioner asked the Public Body for their evidence and submissions about their search efforts, including asking for the following information:
1. who conducted the search;
  2. steps taken by the Public Body to identify and locate records responsive to the Applicant's access request;
  3. the scope of the search (areas searched);
  4. the steps taken to identify and locate all possible locations of records responsive to the access request; and
  5. reasons the Public Body believes that no more responsive records exist than the ones that have been identified.
- [11] The Public Body identified the person who was given proxy access and searched the Minister's email account. This person did two searches before the Public Body responded

to the Applicant. The person searched the inbox, sent box, archives, and appointments of the Minister's email account. The Public Body stated, "all responsive records would have been retrieved by searching this one email account". The Public Body also stated, "the Public Body has no reason to believe that more responsive records exist [than] can be located as a result of a reasonable search."

- [12] In their request for review, the Applicant was concerned that the only type of records the Public Body provided were emails (and an enclosure). The Public Body did not give the Applicant any Blackberry messages, texts, notes or Groupwise calendar entries. I find that the Public Body did not conduct an adequate search for the following reasons under the following headings (a) blackberry message and texts, (b) notes, and (c) Groupwise calendar entries.

***(a) Blackberry messages and texts***

- [13] The Applicant says the following about the Minister and the Chief of Staff's use of Blackberry messages:

. . . I have personal knowledge that former Chief of Staff, [name], and former Minister of Finance, [name], preferred form [of] communication for e-gaming was Blackberry messenger (BBM) pins. These are government records and should have been retained and disclosed.

In the 2016 Auditor General report [the Auditor General] pointed out her concerns for such disclosures in Appendix A under Scope Limitations. "We requested from government all relevant texts, including instant messages and PINs. There were none provided by government even though we were advised that some government business relevant to these files was conducted through these forms of communication."

- [14] We did not request, nor did the Applicant offer, any other explanation of their personal knowledge of the Minister's or Chief of Staff's use of Blackberry messages. We are aware that it was possible to use a Blackberry device to send emails using a provincial

government Groupwise email account. In any event, the Public Body responded that if there were any Blackberry messages or texts that were not transitory, they would have been printed and retained, saying:

During the responsive period for this request most messages and texts would have been considered transitory and would have been retained based on policies in place at that time. Any Blackberry messages or “pins” that were determined not to be transitory would have been printed and stored in the hard copy file.

- [15] The concept of transitory records is not addressed in the *FOIPP Act*, but our office has accepted that a public body does not have to keep every record they receive or create. Public bodies must keep records related to official business but do not need to keep records that are not work related or are only required for a short amount of time. As noted in Report A-2018-020, *Re: Premier’s Office*, 2018 CanLII 82313 (NL IPC), at paragraph 22, “. . . a record’s content, and context, determine whether it is a transitory record, not the record’s form or the medium of communication.” Not all Blackberry messages or texts are transitory just because they are Blackberry messages or texts.
- [16] If a transitory record is responsive and has not been deleted or destroyed, an applicant still has a right to receive a copy of a transitory record, subject to specific and limited exceptions under the *FOIPP Act*. On receipt of an access request for records of an employee or officer of a public body, we would ordinarily expect that public body to search a Blackberry issued by the public body (or other similar device) for responsive records. In the case at hand, the Minister had not been a minister or member of the Legislative Assembly since early 2015, and it is highly unlikely that in 2019 the Blackberry device was available to search. I do not fault the Public Body for failing to search the Minister’s Blackberry device.
- [17] The Public Body says records that were not transitory would have been printed and stored in a hard copy file. The Public Body’s evidence and submissions is that they only

searched the Minister's Groupwise account. As the Public Body did not search printed, hard copy files, they would not have located and retrieved any printed copies of Blackberry or text messages to or from the Chief of Staff or that mention the individual, third party business person. The Public Body believes there might be responsive hard copy records but did not search their hard copy records.

***(b) Notes***

- [18] The Public Body did not comment about notes. The Public Body did not search hard copy notes the Minister sent to or received from the Chief of Staff at the time, or for any hard copy notes that mention the individual, third party business person named in the access request.

***(c) Calendar entries***

- [19] In response to the Applicant's concerns about the lack of calendar entries, the Public Body conducted a third search, and located and disclosed to the Applicant three other records. They were appointments involving both the Minister and the Chief of Staff but were not to or from the Chief of Staff and are not responsive to the access request. I do not fault the Public Body for not locating or retrieving these records in the earlier searches of the Minister's appointments. It appears that the Minister used their Groupwise calendar, and we have no knowledge of the Minister also having used a hard copy calendar. I have no reason to expect other calendar entries exist. I have no concerns about the adequacy of the Public Body's search of appointments or calendar entries.

***Summary of Findings regarding the adequacy of the Public Body's search***

- [20] The Minister's Groupwise account of emails and appointments was not the only possible place to find responsive records, but this was the only place the Public Body searched. It

is reasonable in the circumstances to have expected the Public Body to search for responsive records in the hard copy files for copies of Blackberry messages, texts, or notes. As the Public Body did not do this, I find that the Public Body did not conduct an adequate search.

- [21] There may be challenges to search for the printed, hard copy records of Blackberry messages, texts or notes. There are many ways to manage records, but it is unlikely that there is a single file of communications between the Minister and the Chief of Staff, or a single file of every record of the Minister that mentioned the other individual. If there are printed Blackberry messages, texts, or notes it is more likely the Public Body filed them by subject matter. Applicants must provide enough detail to enable a public body to identify the record(s) they are requesting. I will order the Public Body to offer the Applicant an opportunity to clarify the information they are seeking, for example, to provide a subject matter, to enable the Public Body to identify potential search areas. If the Applicant provides subject matter(s) or other details to enable the Public Body to identify the requested records, I will then order the Public Body to search these hard copy records.

### **Issue 2: Gaps in the Minister's Email Archives**

- [22] The Applicant obtained and provided evidence that there were gaps in the email archives of the Minister between January 1, 2010 and March 31, 2015. The evidence arose from a Special Committee of the Legislative Assembly on Government Records Retention. The Special Committee was created, in large part, because of Order FI-20-007, *supra*, which related to six access requests of two applicants for records of an employee of the Department of Economic Growth, Tourism and Culture (EGTC). In that review, Commissioner Rose discussed gaps in this employee's email archives.
- [23] In 2015, the employee of EGTC discovered they were missing some of their archives from a few years earlier (June 2010 and April 2012). They asked an employee of the provincial



Information Technology Shared Services (ITSS) if they could find duplicate copies of emails in other provincial email accounts, for example in recipients' or authors' email accounts. The employee of ITSS was among several people who appeared before the Special Committee, but I will refer to this employee of ITSS as "the Witness". The Witness stated it would be very difficult to retrace or reconstruct the email account of the EGTC employee because the other email accounts also had missing email(s) (Page 153 of the hearings of 14 October 2020 before the Special Committee):

Chair: At any point in time, were you requested to retrace – so foreseeably, it might have been deleted out of that mailbox, but were you ever asked to go back to see if it was still in a recipient's email?

[Witness]: Yes, I was.

...

They asked the question: Would we be able to do that, in terms of reconstruct? My explanation at the time – it would be very difficult because the previous email or recipients also had missing email at the time.

[24] The Special Committee asked which email accounts had gaps, but the Witness was not confident at the hearing that they would recall the names correctly (page 156 of the hearings of 14 October 2020 before the Special Committee). The Witness offered to check their records after the hearing and give the Special Committee a list of names of the individuals with gaps in their emails, and the size of their email archives. On October 16, 2020, the Secretary of Treasury Board wrote to the Special Committee on the Witness' behalf. The Secretary of Treasury Board is an employee of the Public Body and oversees ITSS. There is a footnote to six of the 26 listed accounts, including the Minister, which states:

As stated at Committee, the AG requested information on specific accounts as part of the AG's overall review process. The size of their email archives are noted. With the exception of [name], gaps were identified during the preliminary search of the archives, however details as to time periods were not recorded. Gaps refers to a time period within an email archive, not a missing archive.

[25] The Applicant was very concerned because the Public Body did not advise the Applicant about any gaps in the Minister's email archives. The Applicant draws parallels with Order FI-20-007, *supra*, in which the head of EGTC knew there were gaps in their employee's email archives when they responded to the six access requests but did not advise the applicants. The former Commissioner held the EGTC failed to comply with their duty to be open, accurate and complete because the EGTC did not advise the applicants that they were not able to access and search for responsive records due to the gaps in the email archive.

[26] The first issue I will consider about the gaps is whether the Public Body responded to the Applicant openly, accurately and completely. To discuss this, I will consider:

- a. whether there were gaps in the email archives of the Minister; and
- b. if so, whether the head of the Public Body who responded to this access request was aware of the gaps;

[27] The Applicant wanted the specific dates of the gaps and says:

It is imperative that Public Body provides me with the precise dates for the actual "gap" or "gaps". This Order can not be accurate without it.

[28] The evidence before the Special Committee is that they did not have the precise dates of the gaps. I will also consider:

- c. the Applicant's request for the dates of the gaps

***a. Were there gaps in the email archives of the Minister?***

[29] Commissioner Doiron asked the Public Body for the following information:

Former Commissioner Karen Rose asked if there were any reasons the Public Body believes that no more responsive records exist than the ones that have been identified. You did not mention the possibility of any gaps in [the Minister's] records in your response. Please make appropriate inquiries, and

advise over what time periods email records of [the Minister] are missing, to assist us in determining whether this is relevant information in assessing the Public Body's duty to assist. . .

[30] The Commissioner used the words "missing records" because at the Special Committee, these gaps were occasionally described as "missing records". The head of the Public Body did not agree with this description. The Public Body responded:

It should first be confirmed that the term 'gap' as found in the correspondence to the Chair does not mean that there are any missing records.

Rather, the term 'gap' as found in the correspondence to the Chair was used to communicate the employee who conducted a preliminary review of email archives in 2015 noted there were dates in which no emails were showing as sent or received in the archives reviewed, hereafter referred to as inactivity. Archive account inactivity does not mean there are any missing records.

. . .

It is not unusual for a user of a Government email account to have dates with no email activity. For example, there may be inactivity on weekend days, when a user is unwell, or when a user is not working (eg. vacation).

[31] The Public Body believes that "gaps" refers to inactivity, such as on days when someone was not working. It is reasonable to expect a person with a government email account to have some inactivity, but I cannot reconcile this with the Witness' evidence before the Special Committee. I do not accept that "gaps" are the same as "inactivity" for the following reasons:

- a. The Secretary of Treasury Board's footnote states that one of the six employees did not have any gaps in their archives. If the word "gap" meant "inactivity", this would mean that this person did not have any period of inactivity between January 1, 2010 to March 31, 2015. I considered whether this person might use their email more frequently, but the size of their archive is significantly smaller than the Minister's

archive. It is unlikely that one of the six individuals did not have any vacation or illness, or other period of inactivity in five years and three months;

- b. The Witness said it would be “very difficult” to reconstruct the emails “because the previous email or recipients also had missing email at the time”. The Witness worked for ITSS and was familiar with government email accounts and archives. The Witness should have expected inactivity on weekends, vacations, etc., and it would not have been worth mentioning. If gaps referred to inactivity, it should not have interfered with the Witness’ ability to locate duplicate copies of emails; and
- c. The Witness based their opinion about gaps in archives on the change in the size of the email archives, stating at page 157 of the transcript of the hearings of 14 October 2020, before the Special Committee, that:

... What I mean by that is, I would’ve got a report saying such and such a person, full archive but had gaps. The size of their archive was 9.5 gig; it’s now at 12.8 gig. I don’t go into the data, or ITSS doesn’t go into the data, to determine the actual lapse or missing records. That is where the department would go into. My report, again, is here’s the total information, here we have records from 2009 to 2010. There’s gaps, there’s some in 2011 and 2012, but not to the detail of what records would be deleted.

The Witness’ example is that the archive increased in size from 9.5 gig to 12.8 gig. It is more likely the Witness misspoke and intended to give an example of an archive getting smaller, rather than referring to periods when an employee was not working. I believe the Witness was looking at changes in the size of the email archives. If no records were created or received it would not cause a change in the size of an email archive.

[32] Although the evidence was given in a different forum, the evidence from someone from within the Public Body is that there were gaps in the Minister’s archive. The Public Body

has not persuaded me that when the Witness and the Secretary to Treasury Board used the expression “gaps” they meant “inactivity”. I find that there were gaps in the Minister’s email archives.

[33] The evidence to the Special Committee is that the gaps in the Minister’s archive were between January 1, 2010 to March 31, 2015. The Applicant believes the evidence before the Special Committee confirms that, more precisely, there were gaps in the email archives of the Minister in the six-month period in 2011 of the Applicant’s access request. I have reviewed the transcripts of the Special Committee and the letter of the Secretary to Treasury Board, and do not agree either confirms there were gaps in the email archives of the Minister during the specific six-month period of the access request. The evidence from the hearing and the letter is that, in 2015, they did not have the time periods of the gaps.

[34] As noted above, Commissioner Doiron asked the Public Body what time periods in the Minister’s email archives records are missing. The Public Body responded that:

Review of the Former Minister’s Email Account

Following your letter, the Public Body undertook a deeper day-by-day and month-by-month review of the former Minister’s email account from 2007 to the time of the former Minister’s departure from Government, including all active folders (in-box, etc.) and the former Minister’s archive.

As a result of this review, the Public Body determined that with the exception of some dates of inactivity, there are emails for the former Minister for all time periods, including during the time period of this access request. It is not unusual for a user of a Government email account to have dates with no email activity. For example, there may be inactivity on weekend days, when a user is unwell, or when a user is not working (eg. vacation).

Consequently, the review of the former Minister’s email account does not confirm that there are any missing emails for the former Minister.

[35] The Public Body did not tell us the time periods of the inactivity but confirms that there were some dates of inactivity in the archives during the six-month period of the Applicant's access request. The Public Body used two different expressions, "inactivity" and "gaps", which I find do not mean the same thing. In my opinion, for the purposes of this review, a "period of inactivity" means that no records were created or received, but a "gap" that was detected by a change in the size of an email archive means records were there but are not there anymore. The Secretary of Treasury Board says that the gaps in the archives are time periods, but it is not clear whether the time periods are hours, days, weeks, or months. I accept that there are gaps in the email archives of the Minister between January 1, 2010 and March 31, 2015 but cannot make a finding about whether there are any gaps in the email archives of the Minister in the six-month period in 2011 of the Applicant's access request.

[36] I will proceed considering whether the head of the Public Body was aware of the gaps in the email archive for the 5-year, 3-month period between January 1, 2010 and March 31, 2015.

***b. Was the Deputy minister aware of the gaps?***

[37] The Applicant believes that, similar to Order FI-20-007, *supra*, the deputy minister who responded to their access request in 2019 was aware there were gaps in the Minister's email archive.

[38] The Witness told the Special Committee that, in 2015, they reported to their deputy minister, and named that individual. The person who the Witness named was the deputy minister in 2019 but was not a deputy minister in 2015. The person the Witness named was part of the executive of the Public Body (the Secretary of Treasury Board) in 2015 and was the deputy minister when the Witness appeared before the Special Committee in 2020. I find that it is more likely than not that the Witness reported their findings to the

person who was the deputy minister of the Public Body in 2019 and who responded to this access request.

[39] It is not clear what information the Witness gave to the deputy minister. The context of the Witness naming their deputy minister, related to a report the Witness had prepared for the RCMP. The Witness described their report to the RCMP at page 153 of the transcript of the hearing of 14 October 2020 as including schematics, technical information, LAN removal forms (to disable an account of a former employee), processes and procedures on how they do electronic searches. It is possible the Witness told the deputy minister there were gaps in the Minister's email archives between January 1, 2010 and March 31, 2015, but I make no finding of what the Witness told their deputy minister in 2015.

[40] If the Witness told the deputy minister in 2015 that there were gaps in the Minister's email archives between January 1, 2010 and March 31, 2015, I am reluctant to find the deputy minister remembered it four years later. I do not find that in 2019, the deputy minister knew there were gaps in the Minister's email archives. As such, I find that the Public Body did not fail to comply with their duty under subsection 8(1) of the *FOIPP Act* to respond to the Applicant openly, accurately and completely.

### **c. Applicant's request for the dates of the gaps**

[41] The Applicant says it is imperative that they know the dates of the gaps, and that this order cannot be accurate without this information. The Applicant has not provided any other information to support these statements. I nevertheless considered whether either duty to assist an applicant, or to respond to an applicant openly, accurately, and completely, includes a duty for the Public Body to investigate further into the dates of the gaps.

[42] Order FI-11-001, *Re: Department of Agriculture*, 2011 CanLII 91839 (PE IPC), at paragraph 37, confirms the duty to respond openly, accurately and completely persists even during a review. In that decision, an applicant was confused by the small number of responsive records and sought an explanation from the public body. The former Commissioner held that a public body is still under a duty to respond to the applicant openly, accurately, and completely even though the questions were raised during the initial steps of the review. But, as also noted in Order FI-22-005, *Re: Health PEI*, 2022 CanLII 83333 (PE IPC), at paragraph 24, not all questions can be answered to the satisfaction of some applicants. The standard established by the *FOIPP Act* is a standard of reasonableness.

[43] Public bodies must make reasonable efforts to respond to an applicant openly, accurately and completely. I considered whether it is reasonable in the circumstances for the Public Body to investigate further to find the precise time periods of the gaps and provide this information to the Applicant.

[44] I am not persuaded that it is possible for the Public Body to identify gaps, by which I mean any time period(s) in the Minister's archives of any records that were in their archives but are no longer there. If a record is deleted and it is beyond the 365-day automatic overwrite period of the backup server, that record is "flushed from our system" (page 95 of the hearings of 16 September 2020, before the Special Committee) and is no longer accessible [see also paragraphs 77 and 78 of Order FI-20-007, *supra*]. It is unlikely anyone within the Public Body would be familiar enough with the Minister's records from 2011 to be able to identify gaps.

[45] I am not sure it is possible to identify gaps, and I therefore do not find that it is reasonable to require the Public Body to further investigate the time periods of the gaps as part of their duty to assist an applicant or to respond openly, accurately, and completely. I will not order the Public Body to identify the time periods of the gaps of the Minister's email archives.



[46] The Public Body does not have the time periods of the gaps in the Minister's archives, but the Public Body has information about periods of inactivity. We do not know if these periods of inactivity are the time periods of the gaps referred to by the Witness and the Secretary of Treasury Board. The Public Body did not provide the particulars of these time periods of inactivity to our office or to the Applicant. I am not ordering the Public Body to identify the time periods of the gaps of the email account of the Minister, but I will recommend that the Public Body give to the Applicant the time periods of inactivity as the Public Body has this information.

## **V. SUMMARY OF FINDINGS**

[47] I find that the Public Body did not conduct an adequate search because they only searched the Minister's Groupwise account, and it is possible that there are responsive, hard copy records, and the Public Body did not search hard copy records.

[48] I do not find that the head of the Public Body knew or ought to have remembered there were gaps in the Minister's email archives. I find that the head of the Public Body did not violate section 8 of the *FOIPP Act* because they did not advise the Applicant of gaps in the Minister's email archives.

[49] I find that the Public Body is not required to do further analysis or research on the gaps in the Minister's email archives to satisfy their duty to respond to the Applicant openly, accurately and completely.

## **VI. RECOMMENDATION**

[50] I recommend that the Public Body give the Applicant the time periods of inactivity for the six-month period of the Applicant's request.

## VII. ORDER

[51] I order the Public Body to offer the Applicant an opportunity to clarify the Blackberry messages, texts, or notes they are seeking, for example to provide a subject matter, to enable the Public Body to identify potential search areas. If the Applicant provides this information, I further order the Public Body to search the hard copies of Blackberry messages, text or notes of the Minister for responsive records. For clarity regarding timing, if the Applicant provides further information to enable the Public Body to locate responsive hard copy records, the date the Applicant provides such information is to be considered the date of an access request.

[52] I thank both parties for their submissions. In accordance with subsection 68(1.1) of the *FOIPP Act*, the head of the Public Body shall not take any steps to comply with this order until the end of the period for bringing an application for judicial review of the order under section 3 of the *Judicial Review Act*, R.S.P.E.I. 1988, c. J-3.

**SGD MARIA MACDONALD**

Maria C. MacDonald