



Our Ref: LS5069 ~ file 14/531

Prof John McMillan AO
Australian Information Commissioner
Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001

Dear Professor McMillan

Re Application under paragraph 89K(2)(a) of the *Freedom of Information Act 1982*

I am writing to apply on behalf of the Australian Electoral Commission ('AEC') under paragraph 89K(2)(a) of the *Freedom of Information Act 1982* (the 'FOI Act') for a declaration that Michael Joseph Eli Cordover is a vexatious applicant for the purposes of the FOI Act.

- 2 Your office recently closed Mr Michael Cordover's application for Information Commissioner review ('IC review') (your reference MR14/00056) under paragraph 54W(b) of the FOI Act with a view to having Mr Cordover apply to the Administrative Appeals Tribunal (the 'AAT') to review the AEC's decision to refuse his FOI Request No. LS4849 for access to the AEC's EasyCount Software source code. A copy of Mr Cordover's FOI Request No. LS4849 is attached as Attachment A.
- 3 The AEC does not ask that the declaration apply to prevent Mr Cordover pursuing review by the AAT of the AEC's decision to refuse FOI Request No. LS4849. The AEC agrees that review by the AAT is the most appropriate way to bring FOI Request No. LS4849 to a conclusion.
- 4 The grounds for seeking the declaration under paragraph 89K(2)(a) of the FOI are that Mr Cordover has made and has caused to be made collateral requests under Part III of the FOI Act in furtherance of his FOI Request No. LS4849, namely.
 - (a) AEC FOI Request No. LS4912 by Martin Landauer; and
 - (b) AEC FOI Request No. LS5069 by Mr Cordover.

**AEC**

Australian Electoral Commission

AEC FOI Request No. LS4912 By Martin Landauer

- 5 Mr Tom Rogers, Deputy Electoral Commissioner, notified Mr Cordover of the outcome of his review of the refusal of his FOI Request No. LS4849 and his decision to affirm that refusal by letter dated 9 December 2013.
- 6 Mr Cordover by email dated 10 December 2013 5:06 PM requested unsigned copies of each letter as a word document or PDF, so he could copy and paste from them. Owen Jones, Senior Lawyer replied to Mr Cordover by email dated 11 December 2013 9:26 AM (Attachment B) indicating that the AEC had completed its obligations in respect of FOI Request No. LS4849. The requested electronic versions of the correspondence were not provided to Mr Cordover.
- 7 On 11 December 2013 3:42 PM the AEC received FOI Request No. LS4912 from Mr Martin Landauer (Attachment C) requesting access to 'the original machine readable document from which the document "LS4883 - file 13/945 Letter to M Cordover notifying decision 20131209" published on the Right To Know website at <https://www.righttoknow.org.au/request/435/response/1506/attach/7/LS4883%20Letter%20to%20M%20Cordover%20notifying%20decision%2020131209.pdf> was derived'.
- 8 The AEC granted FOI Request LS4912 and notified Mr Landauer of that decision by letter dated 10 January 2014 (Attachment D).
- 9 You will note that both Mr Cordover and Mr Landauer made their FOI Requests on the basis that the record of each FOI Request would be published the *Right to know* website at <https://www.righttoknow.org.au/>. Further, it is significant that FOI Request No. LS4912 was made within hours of Mr Cordover being told that the AEC had fulfilled its obligations with respect to FOI Request LS4849. The AEC considers that these circumstances indicate a degree of collusion between Mr Cordover and Mr Landauer in the making of FOI Request No. LS4912.

AEC FOI Request No. LS5069 by Mr Cordover

- 10 Mr Cordover by email dated 13 June 2014 3:57 PM (Attachment E) made FOI Request No. 5069 access under the FOI Act, to Attachment B ("schedule of the relevant documents") to the letter from Owen Jones at the AEC to Tania Strathearn at the OAIC dated 17 April 2014, AEC ref LS4944 ~ file 13/945.
- 11 I found that there was a practical refusal reason in relation to FOI Request No. LS5069, namely that the work involved in processing the request in its original

form would substantially and unreasonably divert the resources of the AEC from its other operations due to the complexity of the contentions made by Mr Cordover about access to the documents listed in the schedule of the relevant documents that is the subject of FOI Request No. LS5069.

- 12 I acknowledged receipt of FOI Request No. LS5069 and initiated a practical refusal consultation by letter to Mr Cordover dated 26 June 2016 (Attachment F). Mr Cordover by email dated 26 June 2014 12:13 PM (Attachment G) to Owen Jones indicated that he would not revise FOI Request No. LS5069 and made contentions about:

(a) **Overlap with FOI Request LS4849**

- (i) Mr Cordover disputed that there was an overlap between his FOI Request No. LS5069 and his FOI Request No. 4849. He based his contention on correspondence from Tania Strathearn on behalf of your Office in an email dated 13 June 2014 3:38 p.m. from which he quotes the following:

"... an agency's decision to provide or not to provide a schedule of documents with an FOI decision is not something that the OAIC can review - it is not an 'access refusal decision' as defined in s 53A of the FOI Act."

- (ii) I do not see that statement as justifying Mr Cordover making FOI Request No. LS5069. The reason why FOI Request No. LS5069 is inappropriate is that it raises the same considerations about access to the schedule of documents, namely whether the names of the documents listed in the schedule, risk exposing the trade secret relating to the EasyCount Software as raised by FOI Request No. LS4849.
- (iii) This is a matter that should be determined by the AAT when it reviews the AEC's decision about FOI Request LS4849.
- (iv) He also cited *Diamond and Australian Curriculum, Assessment and Reporting Authority [2013] AICmr 57* (the 'Diamond Decision') at [18] in support of his contention. The Diamond Decision, however, is not relevant to the circumstances where there is an overlap of applications for access to a document. The Diamond Decision is authority only for the proposition that there is no entitlement to obtain access under Part III of the FOI Act to a document that is within the open access period under the *Archives Act 1983* unless it contains personal information (paragraph 12(1)(a) of the FOI Act); is publicly accessible, as part of a public register or otherwise, subject to a charge (paragraph 12(1)(b) of the FOI Act); is publicly accessible, as part of a land title register, subject to a charge (s 12(1)(ba)); or is available for public purchase (paragraph 12(1)(c) of the FOI Act). The underlying issue here is the application of section 47 of the FOI Act to preserve a trade secret. This issue lies at the hearts of both FOI Request No. LS4849 and FOI Request LS5069.

- (v) The citation of the Diamond Decision is an example of the unnecessary work that is involved in dealing with Mr Cordover because of the fanciful assertions that he makes in support of his requests.

(b) The practical refusal reason

- (i) Mr Cordover's contention was argumentative and distorted the point made in my letter to Mr Cordover of 26 June 2014 that it was unnecessary to have to traverse in a separate FOI Application (FOI Request No. LS5069) contentions that are traversed in relation to FOI Request No. LS4849.
- (ii) The work required to properly address those contentions in the context of the current FOI Request and set out the reasons in a letter communicating a decision on FOI Request LS5069 I estimate to be substantial. This involves several days work in preparing a recommendation for my consideration and the time for me to give proper consideration to that recommendation.

(c) Vexatiousness

- (i) Mr Cordover contended that my consideration that FOI Request No. LS5069 is vexatious is not a relevant consideration as to whether a practical refusal reason exists (s 24AA(3)). It seems that Mr Cordover relies on the operation of paragraph 24AA(3)(b) of the FOI Act which is directed to excluding any intention (actual or imputed) in making an FOI Request.
- (ii) Mr Cordover has misconceived the law applying to vexatious proceedings which is directed to the objective effect of the relevant proceeding on the respondent: see [Oceanic Sun Line Special Shipping Company Inc v Fay \[1988\] HCA 32; \(1988\) 165 CLR 197 \(30 June 1988\)](#) (the 'Oceanic Sun Line Case') and not to the intention of the applicant.
- (iii) In the Oceanic Sun Line Case Brennan J at paragraph 6 of his reasons for judgment said:

In the well-known statement of principle in Scott L.J's judgment in *St. Pierre v. South American Stores* (at p 398) however, they were not used as directly descriptive of the conduct of the plaintiff but as descriptive of the objective effect which continuance of the action would have on the defendant: "the defendant must satisfy the Court that the continuance of the action would work an injustice because it would be oppressive or vexatious to him ...". On that approach which, in my view, should be accepted as correct, I do not think that one should read into the words a requirement that the continuance of the action would involve moral delinquency on the part of the plaintiff (note the contrary view expressed by Lord Kilbrandon in *The Atlantic Star*, at p 477 and by Lord Salmon in *MacShannon*, at pp 818-819). Rather, it seems to me that those words should be read, in the *St. Pierre* formulation, as describing and characterizing the objective effect, on balance, of a continuation of the particular forum as the venue of the proceedings rather than as describing the conduct of the plaintiff in selecting or persisting with that forum (cf. per Gibbs J., Cope

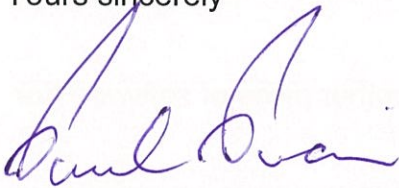
Allman, at p 494: "the exercise ... of ... jurisdiction would be vexatious to the defendants or would result in any real injustice to them").

- (iv) This is another example of the unnecessary work caused by fanciful contentions by Mr Cordover.
- (v) In my view the vexatious effect of the application falls within the ambit of subparagraph 24AA(1)(a)(i) of the FOI Act because processing FOI Request No. LS5069 would unreasonably divert the resources of the AEC from its other operations.

13 I decided today to refuse Mr Cordover's FOI Request No. LS5069 and by letter notified him of my decision.

14 For the above reasons the AEC seeks a declaration by you that Mr Cordover is a vexatious applicant.

Yours sincerely



Paul Pirani
Chief Legal Officer

4 July 2014

FOI REQUEST NO. LS4891

From: Michael Cordover [<mailto:foi+request-435-87abdfce@righttoknow.org.au>]
Sent: Friday, 4 October 2013 5:43 PM
To: INFO
Subject: Freedom of Information request - Software by which Senate counts are conducted

Dear Australian Electoral Commission,

This request is in two parts. I am happy for you to consider the request as a single request as they are all closely related, or as multiple requests if that is preferable for you.

Part 1: source code for counting software

I am seeking source code for the software used to conduct the count of votes for a Senate election.

This request includes scripts or interpreted code used within another piece of software (for example, T-SQL scripts, stored procedures etc).

This request excludes software used for data entry or for interpretation of those scripts but includes data validation software if that is distinct from data entry software.

This request may encompass more than one piece of software and I seek source code for each.

Part 2: data specifications

I am seeking any documents which describe bespoke data formats used by any of the software sought in Part 1, either as input or output formats.

This request excludes any data formats which are human readable or for which published specifications are available (e.g. PDF).

For clarity, the types of documents I am seeking may include database table specifications, EBNF specifications for bespoke input data, column descriptors for CSV files, XML schemas or similar documents.

I am seeking a waiver of all associated access charges on the basis that publication of these documents would be in the public interest. In particular it would provide public confidence that the electronic count is conducted in accordance with the law.

Yours faithfully,

Michael Cordover

Please use this email address for all replies to this request:

foi+request-435-87abdfce@righttoknow.org.au

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EMAIL TO MR CORDOVER DATED 11 DECEMBER 2013 9:26 AM

From: Owen Jones
Sent: Wednesday, 11 December 2013 9:26 AM
To: Michael Cordover
Subject: RE: LS4883 Your request for internal review of the refusal of your FOI Request No. LS4849 [DLM=For-Official-Use-Only] [DLM=Sensitive:Legal]

Sensitive:Legal

Dear Mr Cordover

I refer to your email of 10 December 2013 5:06 PM about this matter. I note that you have received the decision of the Deputy Electoral Commissioner in relation to the internal review of the decision to refuse your FOI Request No. LS4849. That completes the AEC's obligations under the *Freedom of Information Act 1982* in relation to your request.

Regards

Owen Jones

Owen Jones | Senior Lawyer
Legal Services Section | Legal & Compliance Branch
Australian Electoral Commission

T: (02) 6271 4528 | F: (02) 6293 7657



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-----Original Message-----

From: Michael Cordover [<mailto:foi+request-435-87abdfce@righttoknow.org.au>]

Sent: Tuesday, 10 December 2013 5:06 PM
To: Owen Jones
Subject: Re: LS4883 Your request for internal review of the refusal of your FOI Request No. LS4849 [DLM=For-Official-Use-Only]

Dear Owen,

Thank you for this response.

Would it be possible to get unsigned copies of each letter as a word document or PDF, so I can copy and paste from them?

If you'd prefer to send those copies to a private email address please let me know.

Many thanks

Michael Cordover

-----Original Message-----

For-Official-Use-Only

Dear Mr Cordover

I refer to your email of 8 November 2013 3:52 PM requesting internal review of the decision by Mr Paul Pirani, Chief Legal Officer made 4 November 2013 to refuse your FOI Request No. LS4849 relating to the source code of the EasyCount Software.

I enclose a scanned version of the letter dated 9 December 2013 from Tom Rogers, Deputy Electoral Commissioner, notifying you of the outcome of his review of your FOI Request No. LS4849.

Regards

Owen Jones

Owen Jones | Senior Lawyer
Legal Services Section | Legal & Compliance Branch
Australian Electoral Commission

T: (02) 6271 4528 | F: (02) 6293 7657

[1]Australian Electoral Commission logo [2]Australian Electoral Commission

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should be consulted prior to any decision to disclose the existence or content of any advice contained in this email to a third party.

For-Official-Use-Only

From: INFO
Sent: Monday, 11 November 2013 10:03 AM
To: Legal Services - NO
Subject: FW: Internal review of Freedom of Information request - Software by which Senate counts are conducted [DLM=For-Official-Use-Only]
Importance: High

For-Official-Use-Only

Legal Services,

Michael Cordover has replied re his FOI request. LS4849 FOI Request.

Sally Bolton | Project Officer

Enrolment & Internal Communication Section | Education & Communications Branch

Australian Electoral Commission

T: (02) 6271 4404 | F: (02) 6215 9999

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FOI REQUEST NO. LS4912

From: Matthew Landauer [<mailto:foi+request-485-49df8575@righttoknow.org.au>]
Sent: Wednesday, 11 December 2013 3:42 PM
To: INFO
Subject: Freedom of Information request - Machine readable document from which "LS4883 - file 13/945" is derived

Dear Australian Electoral Commission,

This is an application for the original machine readable document from which the document "LS4883 - file 13/945 Letter to M Cordover notifying decision 20131209" published on the Right To Know website at <https://www.righttoknow.org.au/request/435/response/1506/attach/7/LS4883%20Letter%20to%20M%20Cordover%20notifying%20decision%2020131209.pdf> was derived.

This request is specifically for the original machine-readable Microsoft Word document before it was printed out, signed, and then scanned back in.

As stated in OAIC guidelines 3.9 available at <http://www.oaic.gov.au/freedom-of-information/applying-the-foi-act/foi-guidelines/part-3-processing-requests-for-access/what-a-document-is>

"A 'document' is defined in s 4(1) to include any or any part of the following: ... any article on which information has been stored or recorded, either mechanically or electronically any other record of information"

And as stated in OAIC guidelines 8.111 available at <http://www.oaic.gov.au/freedom-of-information/applying-the-foi-act/foi-guidelines/part-8-decisions-on-freedom-of-information-requests/giving-applicants-access-to-documents>

"8.111 Section 17 requires an agency to produce a written document if the applicant does not wish to be provided with a computer tape or disk. If the information is in the form of a sound recording the agency should provide a transcript (s 17(1)(c)(ii)). Similarly, if the agency could produce a written document through the use of certain hardware and/or software that would meet the particulars of a request, it should do so (s 17(1)(c)(i)). In these cases, the agency must deal with the request as if it were a request for access to the written document and the FOI Act applies as if the agency had such a document in its possession (s 17(1))."

Please treat this as a request for access under the Administrative Access Scheme that the Australian Information Commissioner suggests each agency should establish.

if it is not possible to deal with the application in that way please treat it as a formal application under the Freedom of Information Act.

Yours faithfully,

Matthew Landauer

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foi+request-485-49df8575@righttoknow.org.au

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**LETTER TO MARTIN LANDAUER NOTIFYING DECISION ON FOI REQUEST NO.
LS4912**

[see the separate Acrobat file *LS5069 Attachment D to letter to Australian Information Commissioner.pdf*.]

FOI REQUEST NO. 5069 MADE BY EMAIL DATED 13 JUNE 2014 3:57 PM

From: Michael Cordover [<mailto:foi+request-648-a2719702@righttoknow.org.au>]
Sent: Friday, 13 June 2014 3:57 PM
To: INFO
Subject: Freedom of Information request - Attachment B to LS4944

Dear Australian Electoral Commission,

I seek administrative access, or if necessary access under the FOI Act, to Attachment B ("schedule of the relevant documents") to the letter from Owen Jones at the AEC to Tania Strathearn at the OAIC dated 17 April 2014, AEC ref LS4944 ~ file 13/945.

A copy of the letter (except attachment B) is available at <http://easycount.mjec.net/2014-05-06-aec-to-oaic.pdf>.

Yours faithfully,

Michael Cordover

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LETTER TO MR CORDOVER OF 26 JUNE 2016

[see the separate Acrobat file *LS5069 Attachment F to letter to Australian Information Commissioner.pdf*.]

EMAIL FROM MR CORDOVER OF 26 JUNE 2014 12:13 PM

From: Michael Cordover [mailto:foi+request-648-a2719702@righttoknow.org.au]
Sent: Thursday, 26 June 2014 12:13 PM
To: Owen Jones
Subject: Re: LS5069 FOI Request by Michael Cordover for Attachment B in a letter from the AEC to OAIC [SEC=UNCLASSIFIED]

Dear Mr Jones,

I acknowledge receipt of Mr Pirani's letter of 26 June.

For the reasons that follow I do not wish to revise my request.

-- Overlap with LS4849 --

I believe there is no overlap between this request and LS4849. Prior to the closure of that IC review I was informed by the OAIC (Email from Tania Stratheran, 13 June 2014 3:38pm) that:

"... an agency's decision to provide or not to provide a schedule of documents with an FOI decision is not something that the OAIC can review - it is not an 'access refusal decision' as defined in s 53A of the FOI Act."

Regrettably I agree that as a matter of law there was no FOI request (prior to this one) for access to the schedule. Whether such a document is otherwise available (for example because it would need to be provided as a matter of AAT procedure) is frankly irrelevant: see Diamond and Australian Curriculum, Assessment and Reporting Authority [2013] AICmr 57 at [18].

-- Practical refusal reason --

A practical refusal reason only exists where the work involved in processing the request would substantially and unreasonably divert the resources of the agency from its other operations. I note that Mr Pirani's letter does not at any stage specifically make this claim.

I reject outright that performing legal research and considering my contentions is "unnecessary" given LS4849. If that matter proceeds to the AAT (as is my intention) then that work will have been necessary in any case, so is not duplicated. If that matter does proceed to the AAT then that work was required only to address this request.

But even if work may need to be unnecessarily duplicated in order to process this request, that alone is not sufficient to raise a practical refusal reason. As the FOI Guidelines state, this "power applies only in strictly limited circumstances" [3.58]. In particular, "agencies must ensure that appropriate resources are allocated to dealing with FOI matters" (ibid).

My request is for access to a single six-page document that has already been located by the AEC. Making a decision whether to grant access is not a diversion of resources but a statutory duty of the agency.

-- Vexatiousness --

Mr Pirani states at [11] that he considers this request to be vexatious. This is not a relevant consideration as to whether a practical refusal reason exists (s 24AA(3)).

If the AEC wishes to do so you are free to make an application under s 89K for a vexatious applicant declaration. In absence of such a declaration, my alleged vexatiousness is not a basis on which to refuse (or refuse to deal with) this request.

-- Further consultation --

I am happy to engage in further informal consultation but otherwise I look forward to your decision by 14 July.

Yours sincerely,

Michael Cordover

-----Original Message-----

UNCLASSIFIED

Dear Mr Cordover

I refer to your email dated 13 June 2014 3:57 PM making the above FOI Request. I enclose a scanned letter to you dated 26 June 2014 from Paul Pirani, Chief Legal Officer of the Australian Electoral Commission about your FOI Request.

Regards

Owen Jones

Owen Jones | Senior Lawyer
Legal Services Section | Legal, Parliamentary and Procurement Branch
Australian Electoral Commission

T: (02) 6271 4528 | F: (02) 6293 7657

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From: Michael Cordover
[[3]mailto:[FOI #648 email]]
Sent: Friday, 13 June 2014 3:57 PM

To: INFO

Subject: Freedom of Information request - Attachment B to LS4944

Dear Australian Electoral Commission,

I seek administrative access, or if necessary access under the FOI Act, to Attachment B ("schedule of the relevant documents") to the letter from Owen Jones at the AEC to Tania Strathearn at the OAIC dated 17 April 2014, AEC ref LS4944 ~ file 13/945.

A copy of the letter (except attachment B) is available at
[4]<http://easycount.mjec.net/2014-05-06-aec-to-oaic.pdf>.

Yours faithfully,

Michael Cordover

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LETTER TO MR CORDOVER NOTIFYING DECISION ON FOI REQUEST NO. LS5069

[see the separate Acrobat *file LS5069 Attachment D to letter to Australian Information Commissioner.pdf.*]