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**VIA EMAIL**

March 26, 2019

[applicant information]

Dear \_\_\_\_\_ :

Re: Request for Records: BCLC File 19-018

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British Columbia Lottery Corporation (BCLC) writes further to your request dated February 10, 2019 (received on February 11, 2019) under B.C.'s *Freedom of Information and Protection of Privacy Act* (FIPPA), BCLC's letter dated February 11, 2019, a telephone conversation between you and the writer on February 28, 2019 and an e-mail from BCLC to you dated February 28, 2019.

You originally requested:

"All correspondence between Jim Lightbody, Brad Desmarais and Rob Kroeker about W5's Feb. 9, 2019 edition, 'The Laundromat.' "

On February 28, 2019, you clarified your request via telephone to be for:

"All correspondence to or from Jim Lightbody, to or from Brad Desmarais and to or from Rob Kroeker about W5's Feb. 9, 2019 edition, 'The Laundromat.' "

BCLC is providing 51 pages of records in response to your request. Some information has been withheld from disclosure under sections 13, 14, 15, 16, 17, 21, and 22 of FIPPA. An additional 12 pages have been withheld in their entirety under sections 13, 15, 16, 19, 21, and 22 of FIPPA.

Additionally, one record (seven pages) is publicly available. For your convenience, please find enclosed a PDF copy of the record. You may also access the record at the following link:

<https://corporate.bclc.com/content/dam/bclc/corporate/documents/2015-09-08-alderson-aml-direction-document-presented-to-new-vp.pdf>

Below are the reasons for withholding information under each of the exceptions to disclosure noted.

**Section 13 (policy advice or recommendations)**

The information withheld under this section constitutes advice and recommendations by BCLC staff and others to BCLC decision makers.

**Section 14 (legal advice)**

The information withheld under this section consists of specific legal advice that has been sought and provided to BCLC.

**Section 15 (harm to law enforcement)**

The information withheld under this section is harmful to law enforcement because it would reveal anti-money laundering control processes. If disclosed, the information would be useful to those seeking to evade detection for committing money laundering offences. In addition, some information withheld under this section could harm the security of a system, including BCLC's computer and communication systems, under with section 15(1)(l) of FIPPA.

**Section 16 (harm to intergovernmental relations or negotiations)**

The information withheld under this section is harmful to intergovernmental relations because disclosure would reveal information that was received in confidence from a government organization.

**Section 17 (harm to the financial or economic interests of BCLC)**

The information withheld under this section is harmful to BCLC's financial or economic interests because disclosure would reveal the private cell phone numbers of several BCLC employees, which could necessitate changing the numbers with an associated cost to BCLC.

**Section 19 (harm to individual or public safety)**

The information withheld under this section is harmful to individual or public safety because it would reveal the identity of law enforcement personnel. Disclosure of this information could result in the targeting of those individuals.

**Section 21 (harm to business interests of a third party)**

The information withheld under this section is harmful to third party business interests. It consists of third-party commercial information that was provided, in confidence, to BCLC and disclosure could reasonably be expected to significantly harm the competitive position or the negotiating position of the third parties. In addition, information withheld under this section was received from a media monitoring service that BCLC subscribes to and the content is subject to copyright.

**Section 22 (harm to personal privacy)**

The information withheld under this section consists of the signatures of BCLC employees and others. Disclosure of this information would be an unreasonable invasion of personal privacy because it could result in identity fraud. Additionally, other personal information has been withheld that would be an unreasonable invasion of personal privacy if disclosed.

The full text of sections 13, 14, 15, 16, 17, 19, 21, and 22 can be found at:  
[http://www.bclaws.ca/Recon/document/ID/freeside/96165\\_00](http://www.bclaws.ca/Recon/document/ID/freeside/96165_00)

BCLC's response will be published a minimum of five business days after release at:  
<https://corporate.bclc.com/who-we-are/corporate-reports/reports-disclosures.html>

If you have any questions or concerns regarding BCLC's processing of your request, please contact me via e-mail at [ksimcoe@bclc.com](mailto:ksimcoe@bclc.com) or at (250) 852-5228.

Additionally, under section 52 of FIPPA, you may ask the Information and Privacy Commissioner to review this reply to your request for information. You have 30 business days from the receipt of this notice to request a review by writing to:

Office of the Information and Privacy Commissioner for British Columbia  
P.O. Box 9038, Station Provincial Government  
Victoria, BC V8W 9A4  
T (250) 387-5629 F (250) 387-1696  
Email [info@oipc.bc.ca](mailto:info@oipc.bc.ca) Online [www.oipc.bc.ca](http://www.oipc.bc.ca)

Sincerely,  
[original signed by]

Kevin Simcoe  
Senior Freedom of Information Analyst

Enclosure