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VIA EMAIL

April 26, 2019
[applicant information]

Dear _____,

Re: Request for Records: BCLC File 19-019

British Columbia Lottery Corporation (BCLC) writes further to your February 10, 2019 request (received on February 11, 2019) under B.C.'s *Freedom of Information and Protection of Privacy Act* (FIPPA) and BCLC's letters dated February 11, 2019 and February 27, 2019.

You requested:

"Correspondence between BCLC CEO Jim Lightbody and assistant deputy minister Sam MacLeod for the period of Nov. 1, 2018 to present day [February 11, 2019]."

Some of the information that you have requested (namely, BCLC's 2019/20 – 2021/22 Service Plan) is publicly available. You may access this record at the following link:

<https://corporate.bclc.com/content/dam/bclc/corporate/documents/bclc-service-plan-2019.pdf>

In addition, BCLC is providing 72 pages of records in response to your request. Some information has been withheld from disclosure under sections 14, 15, 16, 17 and 22 of FIPPA. An additional 32 pages have been withheld in their entirety under sections 13, 15 and 17 of FIPPA.

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

Section 13 (Disclosure would reveal policy advice or recommendations)

The information withheld under this section constitutes advice and recommendations by BCLC staff and others to BCLC decision makers. For example, most of the withheld pages consist of a draft copy of the Service Plan described above.

Section 14 (Legal advice)

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

Section 15 (Disclosure harmful 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, the information withheld under this section could harm the security of a system, including BCLC's computer and communications systems, in accordance with section 15(1)(l) of FIPPA.

Section 16 (intergovernmental relations or negotiations)

The information withheld under this section is harmful to intergovernmental relations because disclosure could reasonably be expected to harm the conduct of relations between BCLC and other governmental agencies.

Section 17 (Disclosure harmful 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.

In addition, the information withheld under this section is harmful to BCLC's financial or economic interests because disclosure would reveal plans that relate to the administration of a public body that have not yet been implemented or made public.

Section 22 (Disclosure harmful 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.

In addition, the information withheld under this section consists of personal information that, if disclosed, would be an unreasonable invasion of the personal privacy of a third party.

The full text of sections 13, 14, 15, 16, 17 and 22 can be found at:

http://www.bclaws.ca/Recon/document/ID/freeside/96165_00

These records 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 or by telephone 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 Online www.oipc.bc.ca

Sincerely,
[original signed by]

Kevin Simcoe
Senior Freedom of Information Analyst

Enclosure