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VIA EMAIL

May 9, 2019

[applicant information]

Dear _____,

Re: Request for Records: BCLC File 19-020

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:

"All of Robert Kroeker's correspondence to and from Ross Alderson during Sept. 1, 2016 to Nov. 30, 2016."

Some of the information that you have requested (namely, the MNP Report) is publicly available. You may access this record at the following link:

https://www2.gov.bc.ca/assets/gov/sports-recreation-arts-and-culture/gambling/gambling-in-bc/reports/mnp_report-redacted.pdf

BCLC is providing 111 pages of records in response to your request. Some information has been withheld from disclosure under sections 12, 13, 14, 15, 16, 17, 19 and 22 of FIPPA. An additional 91 pages have been withheld in their entirety under sections 13, 14, 16, 17, 21 and 22 of FIPPA.

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

Section 12 (Disclosure would reveal cabinet and local public body confidences)

The information withheld under this section, if disclosed, would reveal advice, recommendations and policy considerations prepared for submission to the Executive Council and its committees.

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.

Section 14 (Legal advice)

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

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 facial recognition systems, in accordance with section 15(1)(l) of FIPPA.

Section 16 (Disclosure harmful 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 (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 number of employees of BCLC, which could necessitate changing the numbers with an associated cost.

In addition, some information in the records, if disclosed, would reveal BCLC business matters, which would be harmful to the financial or economic interests of BCLC.

Section 19 (Disclosure harmful 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 BCLC surveillance personnel. Disclosure of this information could result in the targeting of those individuals.

Section 21 (Disclosure harmful 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.

Section 22 (Disclosure harmful to personal privacy)

The information withheld under this section consists of the personal information of various third parties, including a medical condition or treatment and employment, occupational or educational history, the disclosure of which would be an unreasonable invasion of the personal privacy of those third parties.

The full text of sections 12, 13, 14, 15, 16, 17, 19, 21 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