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VIA EMAIL

June 18, 2019

[applicant
information]

Dear ,

Re: Request for Records: BCLC File 19-046

British Columbia Lottery Corporation (BCLC) writes further to your May 22, 2019 request under B.C.'s *Freedom of Information and Protection of Privacy Act* (FIPPA) and BCLC's letter dated May 23, 2019.

You requested:

- "1. Number of STR reports submitted by BCLC to Fintrac by month for calendar years 2010-2014 inclusive; and
- 2. Dollar value of STR reports submitted by BCLC to Fintrac by month for years 2010-2014 inclusive.

If it is not possible to get a dollar value by month or number of STR's by month then annual figures are fine."

In accordance with section 6(2) of FIPPA, BCLC has created two records, both enclosed in the body of this letter, in response to your request.

The first record represents the number of suspicious transaction reports (STRs) submitted by BCLC to the Financial Transactions and Reports Analysis Centre of Canada ("FINTRAC") annually for the years 2010 through 2014 inclusive. BCLC notes that it does not have monthly figures.

Year	Number of Suspicious Transaction Reports
2010	457
2011	628
2012	904
2013	1025
2014	1655

The second record represents the dollar value of STRs submitted by BCLC to FINTRAC monthly for the months of July, 2014 to December, 2014 inclusive.

Month (2014)	Dollar Value of Suspicious Transaction Reports
July	\$2,292,805.00
August	\$16,437,140.00
September	\$19,042,255.00
October	\$22,564,981.00
November	\$17,491,924.00
December	\$17,046,989.00

BCLC has examined the possibility of creating the remainder of the records that you have requested, specifically the dollar value of STRs submitted by BCLC to FINTRAC monthly for the years 2010 to 2013 inclusive and for the months of January, 2014 to June, 2014 inclusive.

In these circumstances, BCLC has concluded that it is not obligated to create the records under section 6(2) of FIPPA, which states:

“...the head of a public body must create a record for an applicant, if

- (a) the record can be created from a machine readable record in the custody or under the control of a public body using its normal computer hardware and software and technical expertise, and,
- (b) creating the record would not unreasonably interfere with the operations of the public body.”

Creating the requested records would unreasonably interfere with BCLC’s operations. This is because:

- creating the records would take hundreds of hours, would require considerable resources and would result in a significant opportunity cost to BCLC;
- BCLC would need to conduct significant manual data operations to compile the information into the records;
- the manual data operations to create new records would necessitate further review for data integrity, potential errors and omissions; and
- the unreasonable interference to BCLC’s operations also includes a negative impact on BCLC’s ability to comply with its reporting obligations to regulators under legislated requirements.

In order to assist you further, BCLC advises that statistics for both the number and dollar value of STRs from January, 2015 to May, 2019 are available online at the following link:

<https://corporate.bclc.com/content/dam/bclc/corporate/documents/bclc-str-chart-2015-2019-march-new.pdf>

The full text of section 6 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 at ksimcoe@bclc.com, via mail 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 Online www.oipc.bc.ca

Sincerely,
[original signed by]

Kevin Simcoe
Senior Freedom of Information Analyst