

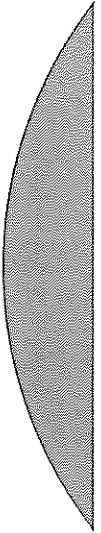


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VIA EMAIL

September 20, 2019

[applicant
information]

Dear ,

Re: Request for Records: BCLC File 19-063

British Columbia Lottery Corporation (BCLC) writes further to your July 3, 2019 request under B.C.'s *Freedom of Information and Protection of Privacy Act* (FIPPA), BCLC's letter dated July 3, 2019, e-mail correspondence between you and BCLC dated July 25, 2019 to August 7, 2019 and BCLC's letter dated August 8, 2019.

You requested:

"Rob Kroeker's sent and received email for June 28, 2019 to July 2, 2019."

You advised that you did not require any records related to SPAM/ advertising, Google Alerts, or other news stories. You also advised that you only required the title page, fee page and signature page of one of the records, a Statement of Work Agreement that was an attachment to one of the responsive e-mails.

BCLC is providing 158 pages of records in response to your request. Some information has been withheld from disclosure under sections 13, 15, 16, 17, 19, 21 and 22 of FIPPA. An additional 13 pages have been withheld in their entirety under sections 13, 14, 17, 21 and 22 of FIPPA.

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, including draft versions of records that are being disclosed

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. In addition, there is some information in the records that deals with BCLC's core business functions, which, if disclosed, would be harmful to the financial or economic interests of BCLC. Some information would be of interest to BCLC's grey market competitors in the online gambling space and, if disclosed, would be harmful to the financial or economic interests of BCLC. Specifically, disclosing this information would give an unfair advantage to BCLC's competitors.

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.

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

These records will be published a minimum of five business days after release at:

<https://corporate.bcl.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@bcl.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

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Sincerely,
[original signed by]

Kevin Simcoe
Senior Freedom of Information Analyst

Enclosure