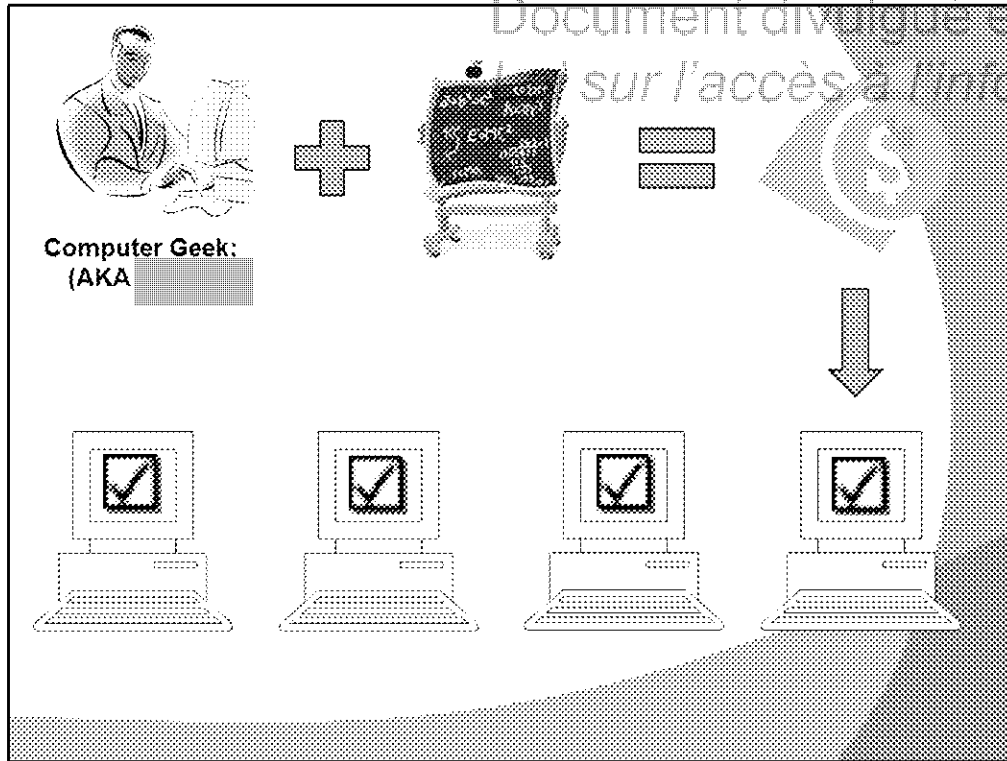


Outline

- What are Digital Currencies?
- Exchanges
- Digital International Community
- Problems with Digital Currencies
- Benefits of Digital Currencies
- Relevance to FINTRAC?
- Way Forward!

What are Digital Currencies?

- Bitcoin Explained
<http://vimeo.com/63502573>
- Electronic money acts as an alternative to traditional currency
- Invented in 2009, digitized money that exists only as strings of digital code
- It's international and has no central bank or regulatory body
- Peer to peer exchange of funds



Example

s.17

- You have a computer geek (AKA [redacted]) who wants to create a currency that is internationally accepted and cannot be controlled or manipulated through a central bank.
- How do you decide who will receive the money. In society, we work for our money.
- It is a digital currency, so why not make computers work for the money
- Create an algorithm that is difficult to solve and people commit their computer's energy to trying to solve the algorithm
- Like going to work everyday to earn money, your computer is attempting to solve a difficult math problem and working to earn currency
- All computers (or groups of computers) are trying to be the first to solve a problem. The first one to solve the problem gets the coins. The algorithm then changes and its another race to be the first to solve the problem.
- Once the problem is solved, the encryption changes and its another race to solve the problem
- Right now the payment is 25 coins each time the algorithm is solved. The more people there are and the less Bitcoins there are to mine (since there are a finite number of coins), the number distributed with each successful solve goes down. Soon it will be 10 coins each time the algorithm is solved
- It is harder to solve the more people that are trying to solve because equivalent of trying to chose a number out of 10 and then a number out of 100 and then a number out of a million

Exchanges

- ◉ Once you have Bitcoin, can exchange into traditional currencies
- ◉ 70,000 transactions each day (approx. 10 million)- exchanging Bitcoin to Currency
- ◉ Pages about how to find the right Bitcoin Exchange
 - Which Currencies they will exchange to
 - Methods of adding funds
 - Methods of withdrawing funds

Exchanges

-There are a number of Exchanges and payment processor services which will convert Bitcoin to traditional currencies and vice versa

-The largest exchange **was** Mt. Gox (allows customers to exchange to USD, CAD, Australian Dollars, Euros, Swiss Francs, Japanese Yen, British Pounds and Russian Rubles)

-BitPay also exchanges to Mexican New Pesos (which raises amount of Bitcoin being converted from narcotics trafficking)

How to find the right bitcoin exchange

Today you find more bitcoin exchanges as one year ago. The bitcoin infrastructure is evolving very fast. On this pages you find valuable information to find exactly the bitcoins exchange that fits to your needs.

Examples:

mtgox.com

Mt.Gox is one of the most established Bitcoin trading platforms for the exchange of Bitcoins between individuals and businesses internationally. Its the oldest running exchange and the one with the highest daily volume.

Currencies: USD, CAD, Australian Dollars, Euros, Swiss Francs, Japanese Yen, British Pounds and Russian Rubles

Adding funds: Dwolla, International bank wire, Bank wire, Cash deposit, Barclays

Withdrawals: Dwolla, Bank wire

bitcoin-central.net

Bitcoin-Central is an exchange, it allows you to easily buy and sell the internet commodity known as Bitcoins. Bitcoin-Central started its operations in December 2010.

Currencies: GBP, EUR, Liberty Reserve USD, Liberty Reserve EUR, others

Adding funds: International wire (any currency)

Withdrawals: Bank transfer, SEPA,

Digital International Community

- ⦿ Mining Pools
 - Limited amounts of currency to be mined
 - Mining Pools are like Lotto Pools
 - Transactions will be denominated in smaller subdivisions of the one Bitcoin
- ⦿ Verification
 - Many people verify a transaction
- ⦿ Competition
 - Value depends on the number of users

Mining Pools

- Limited amount of any given digital currency that can be mined
- At the beginning there were less people, so your computer had a higher chance of winning the lottery and receiving coins
- Now people join mining pools (like people at work putting in for lotto pools) to increase their chances of getting coins but they get a fraction of a coin (smaller and smaller subdivisions)

Verification

- Because it is decentralized, many people in the network must verify the transaction through the "Hive"
- Example: a retailer accepts a transaction. It doesn't occur on the spot

Competition

- Bitcoin is one of many digital currencies
- For example, if Bitcoin is the Gold of Digital Currencies, Lite Coin is the Silver. It drastically improved the verification process
- As with any currency, its value depends on the number of users
- As better technology arises, people will switch

Problems with Digital Currencies

- ⦿ Wide spread acceptance without limitations
 - Main followers **used to be**: computer geeks, drug-dealers and libertarians
- ⦿ Acting like a currency and a security
 - Currency has to be stable to be widely accepted
 - Purchasing power protected by hard limit (21m)
- ⦿ Stored on your hard drive
 - Can accidentally delete your money
- ⦿ Energy Required
 - 982 megawatt hours per day
 - Enough energy to run 31,000 homes
- ⦿ Lack of Understanding
 - Liberty Reserve

Wide Spread Acceptance

- Private currencies have a long history and have surfaced periodically since the 1850s
- Key challenge is to secure widespread acceptance of the nongovernment money
- Most private currencies offline have been quite restricted and cannot be exchanged for cash

ex) Airmiles are not convertible into cash or negotiable outside that business

Disney dollars can be used by local businesses but are not currency beyond a particular precinct

African tribes often have currencies only accepted within that tribe

- Bitcoin followers used to consist mainly of computer geeks, drug-dealers and libertarians
- Now there are signs in Germany that state that stores will accept Bitcoin
- POS are being developed so that Bitcoin can be accepted at retail stores
- Places in Ottawa that will exchange cash for Bitcoin

Currency & Security

- Currency has to be relatively stable to be widely accepted
- Bitcoin has fluctuated from a value \$20 to \$200 per coin acting more like a security
- That being said, its purchasing power is protected by a hard limit (21m) on the number of coins that can exist
- Last coin is expected to be mined in 2140
- Right now the volatility is due to a huge spike in exposure

Stored on Your Hard Drive

- Can accidentally delete your money. Should back it up everywhere incase your computer crashes
- Hackers can get in through phishing devices
- Hackers motivated to reduce confidence by shutting down exchanges in hopes that they may buy low
- Still not all that simple to create a wallet. It will require someone to make the process more trivial and secure before it is more widely accepted

Energy Required

- Blockchain.info (a site that tracks data on Bitcoin mining) estimates that in just 24 hours, miners used about \$147,000 of electricity just to run their hardware
- That is 982 megawatt hours a day, enough energy to run 31,000 homes
- increase in demand will mean an increase in the power used

Lack of Understanding

Liberty Reserve

- Regulars allegedly included cybercriminals, identity thieves, online fraudsters and child pornographers.
- An Undercover agent successfully created an account under the name "Joe Bogus" at the address "123 Fake Name Street" and detailed transactions for "ATM skimming" and "cocaine."
- Serves as a warning shot for other online currencies - virtual units of exchange that mimic cash - that are the subject of growing scrutiny by U.S. regulators.
- More than a million users
- Meanwhile, two other digital currencies - WebMoney and Perfect Money - have stopped accepting U.S. clients
- U.S. authorities said they weren't trying to stamp out digital currencies - which in many cases are used for legitimate purposes - but made clear that such companies would have to comply with the relevant money-laundering regulations or face the consequences.
- Users could not transfer money directly to Liberty Reserve, according to court documents, but instead would send money through credit cards or other means to one of several third-party "exchangers." Those funds would then be converted into digital currency.

Benefits of Digital Currencies

According to Bitcoinme.com (informational website):

1. As Anonymous as You Want it to Be
2. Financial Privacy
3. Your Account Cannot be Frozen
4. No Big Brother
5. No Censorship of Who You Send Money to

In addition:

- No more exchange rates and bank fees to exchange currencies
- Ease in buying foreign goods online
- A unique digital signature makes them impossible to forge

According to Bitcoinme.com (informational website):

1. As Anonymous as you want it to be
 - Just like with cash, transactions can be totally anonymous
 - Transactions are only identified by your Bitcoin address, and you can have as many Bitcoin addresses as you want.
 - You create another new Bitcoin address with one click anytime you want to
2. Financial Privacy
 - Gone are the days of "identity theft"
 - In the old days, credit cards required merchants to have proof of identity in order to shop there
 - Now the merchant only needs to know "that" you paid
3. Your Account Cannot be Frozen
 - No one can freeze your account and keep your money (as long as you keep control and do not use an online bank or wallet service)
4. No Big Brother
 - Third parties can't prevent or control your transactions
 - Transfer money easily through the Internet without having to trust the middlemen
5. No censorship of who you are allowed to send money to
 - No more blocking who you can send money to....just because someone doesn't agree

How Popular Is It?

- ◉ Google Trends:
<http://trends.google.com/trends/explore?q=bitcoin#q=bitcoin&cmpt=q>
- ◉ Bitcoin Central given "bank" status in France
- ◉ BitPay- 4,500 Companies
 - 5.2 million versus 1.2 million for Silk Road
- ◉ BitInstant- more than 70,000 locations
- ◉ Used by Iranian Citizens to skirt economic sanctions
- ◉ Bitcoin Magazine & Conferences
- ◉ Bitcoin Magazine- 2013
- ◉ Mint-Chip- Canadian Mint

How Popular is it?

-Google Trends

-Bitcoin-Central.net is a currency exchange based in France and operated by Paymium, that allows trading between Bitcoins (BTC) and a number of currencies, each with its own trading market. It is notably the first exchange to operate within the framework of European regulation and to guarantee the fiat deposits of its users

-BitPay: handles Bitcoin transactions for some 4,500 companies, taking payments in Bitcoin and forwarding the cash equivalent to the vendor involved

-BitPay recorded \$5.2 million in bitcoin sale last year (well ahead of \$1.2 million estimated to have coursed through Silk Road last year)

-BitInstant: a payment processor that exchanges dollars into Bitcoins at more than 70,000 locations (already in compliance with regulations)

-Iranian citizens are using the virtual currency to skirt the economic sanctions imposed by the country; they are buying goods and services that are normally prohibited to them by the sanctions and are using Bitcoin to do so (music, porn, etc.)

-Online and Print Versions of Bitcoin Magazine as well as two conferences for all things Bitcoin in 2013 (one in California and one in Vienna)

-Bitcoin Magazine: What 2013 has in store:

Bitcoin Wireless: this BitInstant project intends to provide a way of buying credits for

prepaid cellphone and data plans from over 300 carriers around the world at competitive prices.

Physical Wallet: Development of a Bitcoin Wallet device that would take the form of a USB key

-Bitcoin Conference: Last weekend, expecting 300 people and 1500 showed
-People brought prototypes for ATM machines that would accept Bitcoin and other products that would make Bitcoin accessible on a real world scale

-Mint Chip: On the cusp of the post-penny age, the Royal Canadian Mint is preparing to launch a digital alternative to all coinage dubbed Mint Chip
-Announced in April 2012, vision that it would be so easy a child could use it and better than cash, offering money to software developers to develop apps
-Virtual currency would have physical forms including microSD card and USB sticks

Relevance to FINTRAC?

- Complete Anonymity
- [REDACTED]
- Popularity Among Criminals
- Popularity Beyond Criminals
- No Central Regulatory Body
- Our Partners are Recognizing it
 - FinCEN
 - CRA

s.16(1)(c)
s.21(1)(a)

Complete Anonymity

- People use user names with no information about themselves
- They can use more than one user name so you cannot even identify a dollar value attached to one person

[REDACTED]

- Block Chain: every transaction that has ever occurred over Bitcoin but it is a series of letters and numbers

Popularity Among Drug Dealers and Criminals

- Silk Road (black market underground website) is what made Bitcoin so popular to begin with. Drug dealers now had a way to exchange currency to go with their underground website
- Tor technology keeps anonymity: directs internet traffic through a worldwide volunteer network of servers to conceal a user's location
- Criminals consider the money lost during the ups and downs to be the price of doing business

Popularity Beyond Criminals

- Places in Ottawa where they will exchange Bitcoins for Cash with no Questions asked
- There are retailers that accept it as cash

NOT GOING AWAY- Music Downloading example

No Central Authority

-No one to set limitations and to regulate
Registration:

-Any Exchange that requires people to register will go out of business because it is bad for
business

-Libertarians and Drug Dealers do not want to have to report to “the man”

-Has to be required to do so

-What are they going to report? Computerguy101 sent money to Computergirl 102?

-Also have to require people to have identifiers when they use the exchange

Partners

-FinCen has stated that it is not illegal and has released an Official Guidance regarding the
use of Digital Currencies

-CRA has released a Directive as to how to they will be taxed

Relevance to FINTRAC?

FinCEN OFFICIAL GUIDANCE :

"A user of virtual currency is not an MSB under FinCEN's regulations and therefore is not subject to MSB registration, reporting, and recordkeeping regulations. However, an administrator or exchanger is an MSB under FinCEN's regulations, specifically, a money transmitter, unless a limitation to or exemption from the definition applies to the person..."

CRA- CBC News Article

- © "Just in time for tax season, the Canada Revenue Agency says the users of Bitcoins will have to pay tax on transactions in the upstart digital currency...The issue is not just academic. Saskatoon realtor Paul Chavady said he has listed a house priced in BitCoins, and has found clients willing to pay his fees in the electronic currency."When you sell [the BitCoins], they will deposit that in your account," said Chavady. "As soon as it turns into Canadian dollars, it's back in the eyes of the CRA and everybody else. If you get a big deposit of \$10,000, or \$100,000, [CRA is] going to say, 'Hey, where did that come from?'"...The CRA told the CBC there are two separate tax rules that apply to the electronic currency, depending on whether they are used as money to buy things, or if they were merely bought and sold for speculative purposes."

-Exchanger Definition: "An exchanger is a person engaged as a business in the exchange of virtual currency for real currency, funds, or other virtual currency."

-Administrator Definition: "An administrator is a person engaged as a business in issuing (putting into circulation) a virtual currency, and who has the authority to redeem (to withdraw from circulation) such virtual currency."

Way Forward

- ◉ Mitigating the Risk (ACAMS)
 1. Choke Bitcoins Oxygen
 - Last Tuesday- Mt.Gox
 2. Regulate Exchange Houses
 - France- Bitcoin Central
- ◉ Legislation Change Required?
 - New section?
- ◉ How Should FINTRAC Respond?
 - Response Article

Way Forward

-According to ACAMS (Association of Certified Anti-Money Laundering Specialists) there are two ways to mitigate the risk

1. Choke Bitcoins Oxygen by denying access to the foreign exchange market
 - Force exchange houses underground and likely devalue the currency
 - Downside: hurts consumers who want easy, secure, cheap transactions for digital or real world goods
 - Example: Mt. Gox
 - The U.S. government seized an account connecting a Japanese currency exchange, Mt. Gox, and payment services provider Dwolla. Dwolla says it now has 250,000 account holders.
 - Timed to send a clear message, coming during a week when Google Ventures and others announced major new investments in the popular cyber currency.
 - Bitcoin traders are now shut off from one of the few ways to supply and receive funds from Mt. Gox. The Japanese exchange doesn't work with mainstream banks — it only accepts funds via wire transfers and a handful of shadowy e-currencies.
2. Regulate Exchange Houses
 - Ensure that Bitcoin-denominated transactions have the same financial crime identification and reporting requirements as other entities.
 - Example- Bitcoin Central

SWIFT CONFERENCE

- SWIFT is the Society for Worldwide Interbank Financial Telecommunication
- Communications platform to connect more than 10,000 banking organizations in 210 countries located in Belgium
- Presented the use of Bitcoin at Conference
- Majority of the audience concluded that a cryptocurrency like bitcoin may indeed represent the future, but the path will be evolutionary rather than revolutionary.

"The EU tends to view futuristic payments as a framework opportunity rather than a target-rich environment for arrogant enforcement... even more apparent when one looks at the uniformity of the EU e-Money and Payment Services Directives versus the almost hostile FinCEN guidance on virtual currencies and the incomprehensible patchwork of state money transmitter laws. Because of this, I estimate that the EU currently enjoys at least a five-year head start over its U.S. brethren in accommodating evolving payments efforts... In the end, financial and monetary decentralization will win the day because that is more simply the state of nature. I only hope that I am around to enjoy it."

**Canadian regulators welcome US Bitcoin refugees with open arms
Money laundering not a problem here, eh**

By Jasper Mattioli • Get more from this author
Posted in Government, 26th May 2013 15:57 GMT
Free whitpaper -- Hands on with Hyper-V 3.0 and virtual machine movement

"Canadian Bitcoin traders will not be clobbered by laws similar to those being used to target virtual currency exchanges in America, according to a leaked letter from the country's financial investigations unit. The Register has seen a letter from the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) which was sent to several prominent Bitcoin exchanges in the country, explaining they are exempt from strict money-laundering:

'Your entity is not, at this time, engaged as a money services business in Canada as per the Proceeds of Crime (Money Laundering) and Terrorist Financing and its associated Regulations. In fact, your entity doesn't provide the services of remitting and/or transferring funds for the sake of the service. The transfer of funds is simply a corollary of your actual service of buying and selling virtual currency. Therefore, you do not have to register your entity with us.'

It is in fact, an accurate policy interpretation provided by ROC on whether or not they need to be registered reporting entities with us.

s.21(1)(a)

s.21(1)(b)

Canada becomes bitcoin-friendly

FinTRAC does not see the need to regulate several bitcoin exchange models

by [Gaming Counsel](#), May 23, 2013 | 11:57 am

0 Comments and 13 Reactions



A news report from [The Register](#) this past Monday suggested that Canadian anti-money laundering and financial crimes regulations and disclosures will not apply to bitcoin exchanges in Canada. This was based on letters apparently received by some exchanges from the Financial Transactions and Reports Analysis Centre of Canada (FinTRAC). I have not seen the letters, but today I confirmed this position with a spokesperson for the FinTRAC. This posture presents an exciting opportunity for bitcoin exchanges that the Financial Crimes Enforcement Network (FinCEN) recently confirmed are subject to registration, monitoring, and reporting as money services businesses and money transmitters in the United States. On the financial regulatory side, those exchanges may find a more welcoming environment north of the border. However, remember that future changes to the regulatory structure in Canada are possible.

This may change. The statutory and regulatory structure in Canada was drafted before bitcoins were invented. This posture by FinTRAC can lead to a number of money laundering risks that, if unaddressed, will certainly draw the FATF's attention. The FATF monitors and periodically reports on every country's anti-money laundering and counter-terrorist financing regimes. The FATF can bring immense pressure, both through its own moral authority and through its membership, on countries to change laws and curtail practices that present AML and CTF risks.



Questions?

VIRTUAL CURRENCY - BITCOIN

ISSUE:

- On May 20-21, 2013, a series of news articles were released that directly quote FINTRAC's response to an inquiry with regard to a business trading in digital tokens, not being covered under the PCMLTFA at this time.
- As a result of this media coverage, this might be raised at the PPSAC meeting.
- This issue sheet provides background information and considerations involved in determining whether the activity of trading digital tokens such as Bitcoins is covered under the PCMLTFA.

BACKGROUND:

- MSBs have the obligation to register with FINTRAC. To be considered as a MSB in Canada, the MSB must be engaged in the business of any of the following activities:
 - Foreign exchange dealing;
 - Remitting or transmitting funds by any means or through any person, entity or electronic funds transfer network; or
 - Issuing or redeeming money orders, traveller's cheques or other similar negotiable instruments (except for cheques payable to a named person or entity).
- On May 9, 2013, FINTRAC responded to a request from [REDACTED] with regard to whether his business, [REDACTED] is an MSB.
- Based on the information [REDACTED] provided, namely that his "business is engaged in the trade of digital tokens, particularly Bitcoin and Litecoin", FINTRAC determined that this entity is not engaged in MSB activities. [REDACTED] was subsequently informed that his entity is not engaged as an MSB in Canada as per the PCMLTFA and its associated Regulations.
- In fact, his business doesn't provide the services of remitting and/or transferring funds for the sake of the service. The transfer of funds is simply a corollary of the actual service of trading virtual currency.
- Between May 9-16, 2013, FINTRAC responded to three additional requests for MSB determinations all involving the handling of Bitcoins.

s.19(1)

CONSIDERATIONS:

- The trade of digital tokens, including Bitcoins, is not recognized under the PCMLTFA as one of the three MSB activities listed above. While the remitting or transmitting of funds is an MSB activity, in this specific scenario, the remitting or transmitting of funds that occurs is incidental and only happens as the business carries out its core activity of trading digital tokens. The remitting and transmitting of funds is the method used by this business to provide its service of trading digital tokens.

International Considerations:

- Bitcoin Central was recently given “bank” status in France.
- 1.2 million dollars was laundered for Silk Road, a black market underground website, through the exchange of Bitcoin. Drug dealers and criminals now have a way to exchange currency via underground website.
- Used by Iranian Citizens to skirt economic sanctions.
- In US, FinCEN official guidance indicates that an administrator or exchanger of virtual currency is an MSB under FinCEN’s regulations, specifically, a money transmitter.

CURRENT STATUS / PROPOSED MESSAGE:

- Handling Bitcoins, or defining a business as a Bitcoin Exchange, does not automatically make the business exempt from registering as an MSB. The business may perform other activities, which may or may not involve Bitcoins, which would make it subject to the PCMLTFA.
- While the PCMLTFA applies to businesses engaged in “foreign exchange dealing,” this does not apply to Bitcoin as it is not a national currency of any country.
- While the PCMLTFA also covers businesses engaged in “remitting funds or transmitting funds by any means,” this also does not apply to Bitcoin because it does not fall within the definition of “funds” under the PCMLTFR.

Bitcoin

1. Bitcoin vis-à-vis the current PCMLTFA definition of a Money Services Business (MSB)

Bitcoin (BTC), is a decentralized, peer-to-peer network-based virtual currency that is traded online and exchanged into dollars or other currencies. BTC, when paired with third-party services, allows users to mine, buy, sell, or accept BTC from anywhere in the world.¹

Pursuant to the PCMLTFA², MSB triggering activities are:

1. Being engaged in the business of foreign exchange dealing;
2. Being engaged in the business of remitting funds or transmitting funds by any means or through any person, entity or electronic funds transfer network; or
3. Being engaged in the business of issuing or redeeming money orders, traveller's cheques or other similar negotiable instruments except for cheques payable to a named person or entity.

Triggering Activity #1: Foreign Exchange

Selling or buying BTC does not fall under the definition of foreign exchange because it is not a recognized currency (e.g. A MSB must exchange currency of two or more countries to be considered a foreign exchange dealer).

Triggering Activity #2: Funds Transfer

There seems to be only two specific scenarios where BTC-related transactions may fall under the definition of an Electronic Funds Transfer (EFT) - current thresholds apply:

1. *Outgoing EFT*: If the MSB, at the request of a client, accepts funds from that client, converts those funds to BTC for the purpose of sending out of Canada and re-converting into funds to a beneficiary outside of Canada.
2. *Incoming EFT*: If the MSB receives BTC from outside of Canada, sent at the request of a client, converted from funds for the purpose of being re-converted into funds once in Canada to be paid to the beneficiary.

“electronic funds transfer” means the transmission — through any electronic, magnetic or optical device, telephone instrument or computer — of instructions for the transfer of funds, other than the transfer of funds within Canada.”³

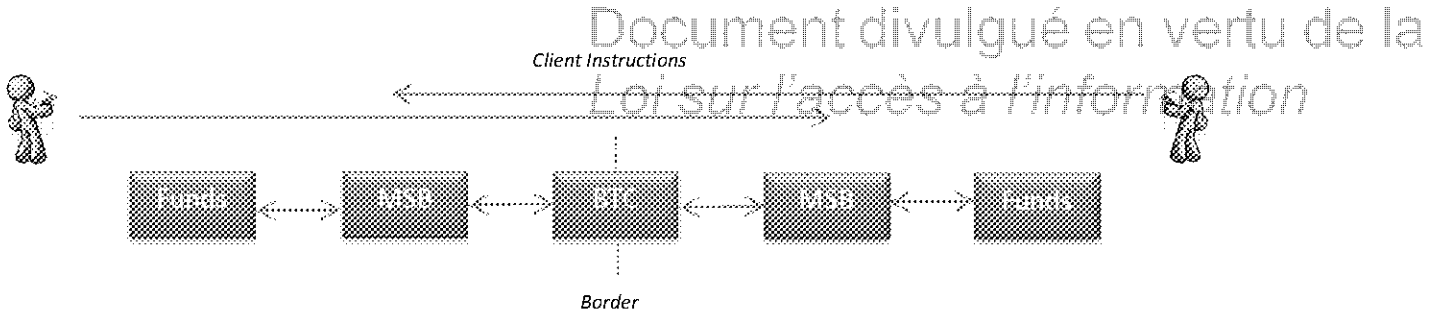
“funds” means cash, currency or securities, or negotiable instruments or other financial instruments, in any form, that indicate a person’s or an entity’s title or interest in them.”⁴

¹ FBI Intelligence Assessment - Bitcoin Virtual Currency (April 2012)

² par. 5(h) - PCMLTFA

³ s.1(2) - PCMLTFR

⁴ *Ibid*



Triggering Activity #3: Issuing or Redeeming Negotiable Instruments

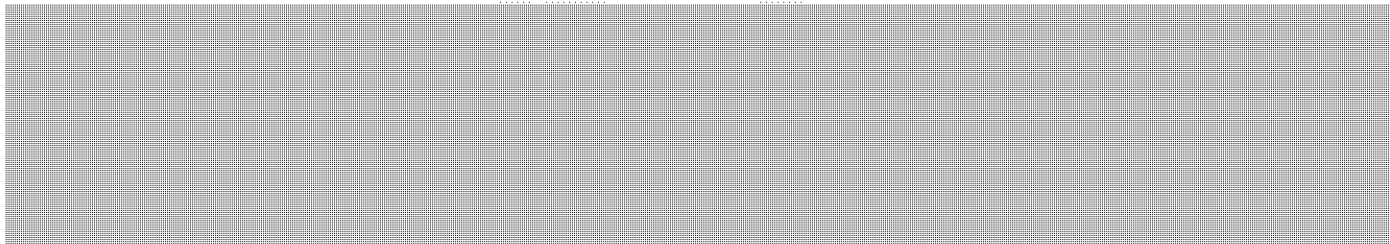
BTC is not considered a negotiable instrument under our legislation or associated regulations.

“monetary instruments” means the following instruments in bearer form or in such other form as title to them passes on delivery, namely,

- (a) securities, including stocks, bonds, debentures and treasury bills; and
- (b) negotiable instruments, including bank drafts, cheques, promissory notes, travellers' cheques and money orders, other than warehouse receipts or bills of lading.

For greater certainty, this definition does not apply to securities or negotiable instruments that bear restrictive endorsements or a stamp for the purposes of clearing or are made payable to a named person and have not been endorsed.⁵

s.16(1)(c)
s.20(1)(c)
s.21(1)(c)



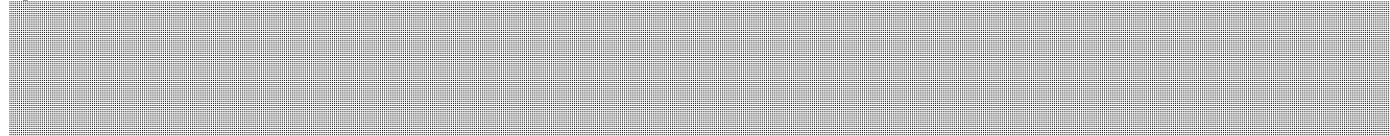
3. International entities with a physical presence in Canada

The assessment of any entity with a clear and substantial physical presence in Canada must be based on its business model and activities. As described above, if the entity were to conduct BTC-related activities that parallel an EFT, that entity would be considered a MSB as defined by the PCMLTFA.

⁵ Cross-Border Currency and Monetary Instruments Reporting Regulations

⁶ MSB Registration#: M12858535

⁷ VirtEx Prospectus (March 2013)



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**is withheld pursuant to sections
est retenue en vertu des articles**

21(1)(a), 21(1)(b)

**of the Access to Information Act
de la Loi sur l'accès à l'information**

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21(1)(a), 21(1)(b), 69(1)(a)

**of the Access to Information Act
de la Loi sur l'accès à l'information**

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20(1)(c), 21(1)(a), 21(1)(b), 24(1)

**of the Access to Information Act
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20(1)(c), 21(1)(a), 21(1)(b), 69(1)(a)

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21(1)(a)

**of the Access to Information Act
de la Loi sur l'accès à l'information**

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24(1)

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69(1)(f)

**of the Access to Information Act
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16(2)(a), 21(1)(a)

**of the Access to Information Act
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16(2)(a), 17, 20(1)(a)

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16(1)(c), 16(2)(a), 20(1)(c), 24(1)

of the Access to Information Act
de la Loi sur l'accès à l'information