



THE TWENTY-THIRD REPORT OF THE COMMISSION FOR STANDARDS IN PUBLIC LIFE (CSPL)

1 FEBRUARY 2022 – 31 JULY 2022

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SECTION ONE – INTRODUCTION

1. Preface

The Commission for Standards in Public Life (the “CSPL”) was established as an institution supporting democracy under the Cayman Islands Constitution Order 2009 (the “Constitution”). Its introduction reinforced the need to have regard to ethics and transparency as important elements of a democratic society and the necessary protection of the rights and freedoms of the people in the Cayman Islands.

With its mandate as set out in section 117(9) of the Constitution, the first CSPL was appointed in January 2010. The CSPL’s overarching powers are ingrained in the Standards in Public Life Act, 2021 and the Standards in Public Life Regulations, 2020.

1.1. Membership of the CSPL

As prescribed in the Constitution, the Governor shall, after consulting the Premier and the Leader of the Opposition, appoint, from among persons of high integrity and with experience in the public or private sector, the CSPL comprising –

1. A Chairpersons;
2. A chartered or certified accountant with at least ten years’ experience;
3. A legal practitioner who has practices in the Commonwealth for at least ten years; and
4. Not more than two other members.

(See Appendix for Changes in Membership)

1.2. Summary of CSPL Activities

In this Report, the CSPL will outline the progress made and the key issues arising from the work completed by the CSPL over the period 1 February 2022 – 31 July 2022.

1.3. During the current reporting period the Members have:

- a. finalised the CSPL’s Twenty-First and Twenty-Second Report;
- b. discussed the SPL (Amendment) Bill and Regulations;
- c. liaised with the Clerk of Parliament to offer the CSPL’s assistance with the Parliamentary Code of Conduct;

- d. agreed to actively monitor the Central Procurement Office website on a periodic basis ;
- e. discussed complaints received and determined the relevant actions required;
- f. discussed the various aspects of the outstanding and incomplete declarations for the 2020-2021 ROI reporting period;
- g. spent time considering and handling matters related to the submissions of declarations by persons in public life;
- h. discussed and issued a number of correspondence;
- i. discussed enhancements for the Register of Interests (the “ROI”) portal for the 2022 declaration period;
- j. discussed various news articles in relation to the functions of the CSPL; and
- k. discussed the CSPL’s Policies and Procedures.

SECTION TWO – MEETINGS AND ADMINISTRATIVE MATTERS OF THE CSPL

2.1. Meetings

The reporting period for this Report commenced on 1 February 2022. During this period, the CSPL held general meetings on 2 February 2022, 25 February 2022, 6 April 2022 and 12 May 2022. Additionally, the CSPL held extraordinary meetings on 7 February 2022, 15 March 2022, 19 April 2022, 30 May 2022, 8 June 2022, and 27 June 2022.

The Minutes of the Meetings of the CSPL reflect the matters discussed and undertaken by the CSPL. Once approved, copies of the CSPL Meeting Minutes are available on the CSPL’s website.

The 8th Annual Conference of the Commonwealth Caribbean Association of Integrity Commissions and Anti-Corruption Bodies (the “CCAICACB”) took place in St. Kitts and Nevis, and virtually, from 23 – 25 May 2022 under the theme, ‘Controlling Corruption – Preventative Mechanisms Work Better Than Reactive Measures’. The Chairman attended some of the virtual sessions and circulated a conference synopsis to members.

Data Protection training was arranged for 24 May 2022 and subsequently cancelled due to conflict of dates with the 8th Annual CCAICACB Conference noted above. The Secretariat will coordinate with the Cayman Islands Government’s (the “CIG”) Information Rights Unit (the “IRU”) to reschedule the said training in due course.

The Chairman met with His Excellency the Governor (“His Excellency”), on 9 June 2022, to update him on the recent work of the CSPL which is captured in this Report. A meeting synopsis was circulated to members for their information.

SECTION THREE – STANDARDS IN PUBLIC LIFE (SPL) ACT

3.1. Correspondence from the Constitutional Commission

Members considered a letter dated 30 October 2020 from the Chairman of the Constitutional Commission (the “CC”), to the previous CSPL Chairman, regarding the commencement of the SPL Act.

The CC’s letter read, “it is noted in respect of the Commission for Standards in Public Life that section 116(9)(b) of the Constitution provides that: “The functions of the Commission [for Standards in Public Life] shall be [...] to exercise such other functions as may be prescribed by a law enacted by the Legislature.” Additionally, section 121(5) provides that: “A law enacted by the Legislature shall make provision for giving effect to [the section relating to Register of Interests], including the sanctions which may be imposed for a failure to comply with subsection (2) or (3) and, notwithstanding any provision of Part IV of this Constitution, the sanctions which may be imposed may include the suspension of a member of the Legislative Assembly from sitting in it for such period as may be prescribed in such a law.

The Constitutional Commission welcomes the commencement of the Standards in Public Life [Act], 2010, the Standards in Public Life (Amendment) [Act], 2016, and the Standards in Public Life Regulations, 2020. However, while these provisions are now operational, it may still be that your legislation requires some further amendment. If this is the case, the Constitutional Commission would be pleased to receive details of any provisions for amendment that you have identified. If, in the alternative, this is not something that you consider necessary at the present time, the Constitutional Commission would be grateful if you could confirm this position by reply.”

Members responded on 23 February 2022 “to note that the [CSPL] is currently in the process of working with the Attorney General’s Chambers [the “AGC”] to revise the [SPL]. We look forward to providing the [CC] with a formal update on this as soon as one is available.” A copy of the CSPL’s legal advice received from the AGC was included as a supporting document. The CSPL did not receive a response from the CC and agreed to close this matter. A copy of the SPL Act and SPL Regulations will be shared with the CC, the Auditor General’s Office (the “AGO”),

the Human Rights Commission (the “HRC”), the Judicial and Legal Services Commission (the “JLSC”) and the Office of the Ombudsman once finalised.

3.2. Amendments to the SPL Act and Regulations

Members actively reviewed and discussed proposed amendments to the SPL Act and Regulations. The comments and amendments provided by the Senior Legislative Counsel on S.2, S.11, S.12, S.14, S.16, S.36, Schedule 1 and Schedule 2 to the SPL Act and the rationale of agreed changes was reviewed and approved. Finalisation of the amendments was forthcoming at the close of this reporting period.

SECTION FOUR – PROCUREMENT

4.1. CSPL and Procurement Procedures

The CSPL reviewed the Central Procurement Office (the “CPO”) website (<https://www.procure.gov.ky/>) and noted that the 2020 and 2021 Annual Public Procurement Reports had not been posted on the CPO website.

4.2. Members further noted that a key function of the CSPL is “*to review and establish procedures for awarding public contracts*”. The Secretariat was asked to draft correspondence to the Director of CPO to:-

- 1) point out that the above-mentioned Reports had not been posted on the CPO website and to seek clarity on this matter; and
- 2) enquire about various delinquencies found on their website with regards to “*awarding public contracts*”. Members will review and approve the said letter for issuance over the next reporting period.

4.3. Additionally, members agreed to monitor the CPO website on a periodic basis. The CSPL opined that key areas of interest include meeting minutes, procurement statistics available via an annual report and information on contracts to monitor and assess.

SECTION FIVE – REGISTER OF INTERESTS (“ROI”)

5.1. Background and Developments

The functions of the CSPL include, amongst other things, *“to supervise the operation of registers of interest and to investigate breaches of established standards...”* (section 117(9)(c) of the Constitution).

In accordance with section 121(1) of the Constitution, *“There shall be for the Cayman Islands a Register of Interests, which shall be maintained by the Commission for Standards in Public Life.”* Section 121(2) elaborates that all persons in public life have a constitutional obligation to declare to the CSPL, *“for entry in the Register of Interests, such interests, assets, income and liabilities of that person, or of any other person connected with him or her, as may be prescribed by [the] Act.”* The SPL Act and Regulations were commenced in early 2020 to outline the operation of the Register and the process for submissions to it.

The ROI in accordance with s. 121(1) of the Constitution, and the introduction of the SPL Act in accordance with s.117 (9)(c) of the Constitution to, amongst other things, provide CSPL with the powers *“to supervise the operation of registers of interests and to investigate breaches of established standards...”*. Furthermore the commencement of the SPL Regulations, 2020, provided the approved form for declarations of interests, income, assets and liabilities to be completed by persons in public life and give effect to the various provisions of the SPL Act. Both legislative documents combined provide the CSPL with the power needed to meet its constitutional mandates to supervise the operation of registers and to investigate breaches of established standards in public life.

In 2020, the CSPL received the first filings of annual declarations for submission to the ROI in accordance with the SPL Act. Following receipt of these declarations the CSPL embarked on the development of a system to allow for the electronic filing of annual declaration forms by Persons in Public Life. The online ROI portal was launched in 2021 to accept declarations for the period ending 30 June 2021.

5.2. Summary of ROI Submissions for 2021

Members discussed the various aspects of the outstanding and incomplete declarations for the 2020-2021 ROI reporting period. Additionally, members agreed to improve the online submission process for the 2022 reporting period based on the issues presented in the past period.

Members were informed that telephone calls to persons with outstanding declarations for the 2020-2021 declaration period were still in progress. The follow-up calls will be logged by the Secretariat periodically. A letter was issued to the Honourable Deputy Governor (the “Hon. DG”) on 7 April 2022, advising of the overdue declarations and seeking his assistance in an effort to remedy the situation.

Additionally, Members were made aware that reports were received from several members of the public who experienced frustrations with the portal. However, the Secretariat staff were able to walk persons through to reduce frustration and increase ease of use of the portal. The Manager further noted that a declarant reported a positive experience with the Office Administrator who guided them through the ROI portal and the submission process.

5.3. Request for Exemption from ROI Requirements for year ending 30 June 2020

Members discussed previous correspondence issued to the Deputy Chief Officer (the “DCO”) of the Office of the Commissioner of Police in response to the Commissioner of Police/Chief Officer’s exemption request as captioned above which remains unanswered. Follow-up correspondence was issued on 11 February 2022.

5.4. Legal Advice

The CSPL sought legal advice from the Honourable Attorney General (the “Hon. AG”), Portfolio of Legal Affairs, regarding two separate matters:-

a. Request for clarification on the ROI – Responsibilities of Judges and Magistrates

The CSPL sought clarification as to whether members of the Judiciary (namely Judges and Magistrates) are currently captured in the list of Persons in Public Life in Schedule 1 of the SPL Act, and if not, the possibility of including members of the Judiciary in this list of Persons in Public Life. A letter was issued to the Hon. AG on 1 April 2022.

On 11 April 2022, the CSPL received official correspondence from the AGC in response to the request for clarification on the ROI – Responsibilities of Judges and Magistrates. The correspondence stated *“we do not consider the members of the Judiciary are within the scope of persons in public life as per Schedule 1 to the Standards in Public Life Act (2021 Revision).”* Additionally, it was stated that, *“there is precedent in other jurisdictions where members of the*

Judiciary are subject to similar legislation. However, as you will appreciate, any decision as to whether such officers should be subject to the requirements of the Act will have to be made by Cabinet.” Members discussed the AGC’s response and requested the Secretariat to conduct research on other jurisdictions that have precedents for the Judiciary to declare their interests. The Secretariat will seek additional advice from the Hon. AG regarding the precedent referenced in his correspondence. Both assignments will be completed during the next reporting session.

b. Persons in Public Life in the SPL Act: Anti-Money Laundering Steering Group (the “AMLSG”)

On 27 April 2022, the CSPL received a query from an outstanding declarant regarding their requirement to file a declaration for an ex-officio role under an entity that they do not consider to fall under Schedule 1 of the SPL Act. The CSPL considered this matter and sought clarification on the application of the SPL Act (2021 Revision) to members of the AMLSG to file declarations. A letter was issued on 10 June 2022 to the Hon. AG.

On 21 July 2022, the CSPL was advised by the AGC that: *“the members of the AMLSG do not, in that capacity, fall within any of the prescribed categories of “person in public life” in Schedule 1 to the SPL Act and would not, therefore, be required to file a declaration pursuant to section 11(1) of the same Act by virtue of their position on the AMLSG.”* The Secretariat will prepare a letter, for the CSPL’s approval, to inform the declarant accordingly. The said letter will be issued during the next reporting period.

5.5. Annual Report

Members discussed the 6-month reporting period of the CSPL and agreed to have future discussions about the merits of aligning this via constitutional change to the proposed new ROI reporting period.

5.6. 2022 ROI Portal Updates

The application underwent some enhancements during this reporting period. The enhancements included the incorporation of a series of automated messages to all registered declarants via portal. Messages were disseminated on 1 July 2022, 18 July 2022 to all declarants and 8 August 2022 to

declarants that missed the declaration period deadline. Secondly, the portal also underwent a migration of the login interface to utilise the eServices sign-on which is being standardised for government online services. Some additional minor enhancements were introduced in an effort to improve functionality and user experience.

Members were informed that a user experience assessment was done and received positive feedback. Additionally, it was noted that the Secretariat is working on additional ROI matters with the Director of e-Government. It was agreed that the communication plan for 2022 submissions will be circulated in due course.

5.7. Query Regarding Investigative Powers of the CSPL

Correspondence was sent on 9 March 2022 in response to a query regarding the investigative powers of the CSPL. The Secretariat was directed to send an additional email with the relevant public authority's complaints form for additional options to file complaints.

5.8. ROI and New CIG Board Members

A letter to the Deputy Governor regarding the recommendation to add ROI responsibilities to the appointment letters of new board members was sent on 28 March 2022. The CSPL is currently awaiting a response.

5.9. Third Year of Annual Declaration Filing (for the period ending 30 June 2022)

The table below shows the status of the annual declarations received for 1 July 2021 – 30 June 2022 as at the date of this report.



Total completed declarations received via the ROI online portal	620
Total completed declarations received manually in person or via email	17
Requests for Extension(s)	3 - formal requests for extensions with completed forms 1 - informal request via email

SECTION SIX – CODE OF CONDUCT AND RELATED MATTERS

6.1. Introduction of Parliamentary Code of Conduct

On 4 March 2022, correspondence was issued from the Constitutional Commission (“CC”) Chairman, to the Honourable Premier and copied to the CSPL and HRC Chairpersons, regarding the above-captioned subject.

6.1.2. Parliamentary Code of Conduct

The CSPL contacted the Clerk of Parliament who advised on 5 April 2022 that the Council was still working to finalise the Parliamentary Code of Conduct. Members agreed to maintain correspondence with the Clerk of Parliament and to offer the CSPL’s assistance with the finalisation of the Parliamentary Code of Conduct.

6.2. Cabinet Manual

The CSPL reviewed and considered the CC’s letter of 10 March 2022 regarding the ‘Cabinet Manual’. A response will be issued during the next reporting session.

6.3. Ministerial Code of Conduct

The CSPL noted that the Ministerial Code of Conduct was approved by Cabinet on 27 July 2021.

6.4. CSPL Code of Conduct for Persons in Public Life

Members reviewed and approved the changes to Section J ‘Remedies’ of the CSPL Code of Conduct. The updated Code of Conduct for Persons in Public Life is now available on the CSPL’s website.

6.5. Reassignment of Ministry of Home Affairs

Members discussed the news article released on 11 April 2022 which stated, *“The Premier announced today that the Ministry of Home Affairs will be reassigned to Minister Sabrina Turner effective Monday, 11 April 2022 following Minister Bernie Bush’s recent infringements of Section 55 of the Constitution and breaches to two sections of the Ministerial Code of Conduct.”* The CSPL agreed to close this item as the Office of the Premier has already taken disciplinary action.

6.6. Elections Observer's Report

Correspondence to the Supervisor of Elections was sent on 28 March 2022 requesting the status of any actions that have been taken to address the recommendations made in the Cayman Islands General Elections 2021 Domestic Observers' Report. The CSPL has not yet received a response. The Secretariat will continue to follow-up on this matter over the next reporting session.

6.7. Anti-Corruption Commission (the "ACC") Liaising

Further to the query discussed at the meeting held 15 July 2021 regarding whether the Commission could liaise with the ACC, it was decided that outside of a formal Memorandum of Understanding between the Commissions, no information should be shared.

SECTION SEVEN – CONFLICTS OF INTEREST

7.1. The CSPL did not consider any matters concerning conflicts of interest during this reporting session.

7.2. CSPL Policies and Procedures

Members discussed the functions, powers and duties of the CSPL in relation to news articles and publications. The Chairman noted and presented:

1. Section 5 (1) of the SPL Act and S1.2 of the Policies and Procedures Manual for the CSPL provide the functions of the CSPL as follows:-

- (a) “to assist in the setting of the highest standards of integrity and competence in public life in order to ensure the prevention of corruption or conflicts of interest;*
- (b) to monitor standards of ethical conduct in the Cayman Islands Parliament, the Cabinet, and on the part of public authorities and public officers;*
- (c) to supervise the operation of the Register of Interests and to investigate breaches of established standards; (d) to review and establish procedures for awarding public contracts;*
- (e) to review and establish procedures for appointing members to public authorities, and the terms of their appointment;*
- (f) to recommend codes of conduct to prevent any Minister, public authority or public officer employing their power for any personal benefit or advantage, and to recommend legislation to provide appropriate sanctions; (g) to report to the Cayman Islands Parliament at regular intervals, and at least every six months; and*
- (h) to exercise such other functions as may be prescribed by this or any other Law enacted by the Legislature.”*

Section 18 of the Act states that *“Where the Commission reasonably suspects that a person in public life has committed a breach of this Act it — (a) may, on its own initiative; or (b) shall, upon the complaint of any member of the public, conduct an investigation.”*

In light of the above, the Chairman noted that only in a situation *“where the Commission reasonably suspects that a person in public life has committed a breach of this Act it may, on its own initiative”* launch an investigation. Therefore, the CSPL should investigate contents of a newspaper article in instances where the CSPL reasonably suspects that a person in public life has committed a breach of this Act.

Members were further advised that a newspaper article, or any other similar publication, does not necessarily meet the standard for reasonable suspicion.

7.3. Request for Guidance on the CSPL Duties and Functions to Investigate Media Articles

It was noted that there is a disagreement between the majority members and the Chairman in respect to when the CSPL should exercise its investigatory powers and duties regarding newspaper articles and publications. Members agreed to seek legal advice from the AGC on this point. The Secretariat was asked to draft a letter to the AG seeking legal opinion on (1) Whether the CSPL has a mandatory duty to investigate publications, (2) if the CSPL does not have a mandatory duty, when can the CSPL exercise its investigatory powers (if any) and any duties (if any) in dealing with publications. The said letter will be reviewed, agreed by the CSPL and issued during the next reporting period.

7.4. Port Authority Director Appointment

Members discussed the surrounding issues of the captioned article. The Chairman dissented to the initiation of an investigation being carried out by the CSPL at this time and agreed only to a general letter of inquiry on the status of the matter. The Secretariat agreed to prepare a draft letter for the CSPL's review and approval.

7.5. National Housing Development Trust Allegations

Members discussed the significance of a media article, published on 18 March 2022, concerning allegations involving the National Housing Development Trust (NHDT). The Chairman noted the newspaper article did not state whether an investigation was being carried out. However, Members noted that the ACC is currently dealing with this matter. Majority Members agreed and asked the Secretariat to draft correspondence to the Chief Officer of the Ministry of Planning to enquire about the status of the matter and to determine whether any government entity has conducted an investigation. The said letter will be issued during the next reporting session.

SECTION EIGHT – EDUCATION AND PUBLIC RELATIONS

8.1. CSPL Work Plan

Members were briefed on the concept of the CSPL’s Work Plan for 2021-2022 which will identify the main initiatives that the CSPL wishes to focus on. In this regard, the Manager brought Members’ attention to the CSPL’s Policies and Procedures Manual, which is currently in draft form and will need to be revised at some point in the future. Members agreed to consider the CSPL’s priorities for 2021-2022 for further discussion throughout the next reporting session.

8.2. Education for Justice (“E4J”)

The CSPL discussed the United Nations Office on Drugs and Crime’s (“UNODC”) E4J educational programme, as well as the work done in primary, secondary and tertiary schools in raising awareness of E4J by the previous CSPL. The Chairman noted that the CSPL’s Work Plan should emphasise community and school outreach utilising the E4J materials.

SECTION NINE – COMPLAINTS

- 9.1.** During this reporting period two complaints were submitted to the CSPL. The first complaint was ultimately withdrawn by the complainant. Therefore, no further action was required by the CSPL.
- 9.2.** The second complaint fell outside of the CSPL’s jurisdiction as based on the information provided, it appeared that it was a personal legal matter. The complainant was advised that they were welcomed to provide more information, should it be beneficial to the CSPL. Subject to no additional information being provided during this reporting period, the complaint remains closed.

SECTION TEN – MOVING FORWARD

10. Over the next reporting period the CSPL will continue to:

- a. finalise the draft SPL (Amendment) Bill, and Regulations;
- b. facilitate any requests for viewing the ROI;
- c. monitor and handle matters related to the submission of declarations by persons in public life;
- d. continue to consider feedback on the new RoI portal;
- e. address any complaints received;
- f. continue to follow-up on the finalisation of a Parliamentary Code of Conduct;
- g. issue correspondence to the various public authorities as detailed in this Report; and
- h. participate in any educational or public relations opportunities, as well as in local and regional cooperation efforts where possible.

For more information on the CSPL please visit www.standardsinpubliclifecommission.ky, e-mail info@standardsinpubliclifecommission.ky, or call 244-3685.

Dated this 5th day of July 2023.



Dr. Sonia Bush (Chairman)



Isatou Smith



J. Rosalie Twohey



Keith Blake



Richard Addlestone

SECTION ELEVEN – APPENDIX

10.1. Changes in CSPL Membership

1. The first CSPL was very ably chaired by Mrs. Karin Thompson, MBE, whose accomplishments, among other things, included the introduction of The Standards in Public Life Act, 2014 (the “SPL Act”).
2. The first CSPL’s 4-year term ended in January 2014. The outgoing CSPL, however, kindly agreed to remain in the post until February 2014.
3. The CSPL is mandated under section 117(9)(g) of the Constitution to report to Parliament at regular intervals and at least every six months.
4. The Reports of the first CSPL, i.e. report numbers 1 through 8, detail the various tasks undertaken by the first CSPL and its accomplishments in each respect. The Reports are available on the CSPL’s website.
5. Previous Chairman Rosie Whittaker-Myles and Former Member Sheenah Hislop were appointed to the CSPL on 1 February 2015 for a period of four years. At the request of His Excellency agreed repeatedly to extend their tenures until 28 February 2021. Member Isatou Smith was appointed, following the resignation of Pastor Shian O’Connor (to pursue educational advancements) on 1 November 2018 for a period of four years.
6. On 1 May 2021, four new CSPL Members were appointed to join previously appointed Member Isatou Smith. The new appointees were Chairman Dr. Sonia Bush and Members J. Rosalie Twohey, Richard Addlestone and Keith Blake.
7. The Reports of the second CSPL headed by the previous Chairman, Rosie Whittaker-Myles, i.e. report numbers 9 through 20, detail the various tasks undertaken by this CSPL and its accomplishments in each respect. These Reports are also available on the CSPL’s website.

10.2. Members Biographies



Dr. Sonia Bush is an Attorney at Law in the Cayman Islands as the owner and sole practitioner of Sonia Bush and Associates Law. **Sonia** obtained a LLB (Hons) degree from the University of Liverpool, and she was trained by one of Cayman's top law firms. Additionally, **Dr. Bush** obtained a Bachelor's of Science Degree in International Finance, (BSc.), a Master of Business Administration Degree (MBA), a Master of Science Degree (MSc.), and a PhD in Management with a minor in Leadership. She also is a registered member of the Society of Trust and Estate Practitioners, and a designated Trust and Estate Practitioner ("TEP") since 2001.

Sonia was called to the Cayman Islands Bar in July 2009, and broadened her exposure to offshore trusts, while working as an attorney at law in Jersey, Channel Islands. Her areas of practice include Trust and Estate Planning, Business Formation, Company Incorporation, Intellectual Property including registration of Trademarks, Work Permits, Family Law, Residency, Guardianship, Wills, Probate and Administration and Real Estate. Sonia is also a Notary Public and provides this service from the Firm's office. In addition to practicing law, Sonia has worked over ten years in the financial industry in the Cayman Islands, in particular at offshore trust and banks as a Trust Account Manager.

Dr. Bush was appointed as Chairman effective 1 May 2021 for a four year term.



Ms. Isatou Smith acts as director for investment funds including several sponsored by large global asset managers. She has been active in the investment funds industry for over fifteen years and has significant regulatory and corporate governance experience with investment entities and their operations. She was previously a Director at Intertrust Fund Services (Cayman) Limited (formerly Walkers Fund Services (Cayman) Limited ("Intertrust")) where she also provided director services to a wide range of investment fund structures with varying investment strategies across multiple jurisdictions. **Isatou** also acts as a compliance

officer for investment entities. In her role as a fiduciary she manages conflicts of interests and oversees adherence to the governing documents of the entities.

Prior to joining Intertrust, **Isatou** was employed by the Cayman Islands Monetary Authority (“CIMA”) as a Senior Analyst in the Investments and Securities Division. At CIMA she was instrumental in key regulatory developments and led a large team of Investments and Securities Analysts that were responsible for the on-going monitoring and regulation of investment funds, mutual fund administrators and securities investment business licensees. Additionally, **Isatou** has acted as a member for the Cayman Islands Hurricane Committee and the Labour Tribunal.

Isatou holds a Bachelor of Law equivalent and Professional Practice Certificate with distinction from the Cayman Islands Law School and a Graduate Diploma in Law from BPP University in London, England. She also has a Master of Business Administration degree with a specialization in Finance from Northeastern University in Boston, Massachusetts. Isatou also received a Bachelor of Business Administration degree in International Business from James Madison University in Harrisonburg, Virginia. Isatou is a professionally accredited director with the Institute of Chartered Secretaries Canada (ICSA) and is also a member of the Association of Certified Anti-Money Laundering Specialists (ACAMS) and of the Cayman Islands Directors Association (CIDA). Ms. Smith was appointed effective 1 November 2018 for a four-year term.



J. Rosalie Twohey recently took a hiatus from her post as Deputy Managing Director of Cainvest Bank and Trust Ltd in order to pursue a LLM from the University of Liverpool. Rosalie has also served as Head of Institutional and Accounting – Trust with the Bank of Butterfield, Financial Controller of Walkers Global Holdings Ltd and previously with Bank Austria Cayman Islands Ltd. In addition to her LLM, Rosalie possesses an MBA from the University of Liverpool and a BSc (Cum Laude) in Accounting from Howard University. Rosalie became a CPA in 1986.

Mrs. Twohey was appointed as a Member effective 1 May 2021 for a four year term.



Mr. Keith Blake is a Senior Director with Alvarez & Marsal, based in the Cayman Islands. He has more than 30 years of insolvency and restructuring experience, including the last 21 years working in the Cayman Islands. After leaving school, **Mr. Blake** spent 10 years at NatWest Bank in the U.K., with the last 18 months of that time working in the bank's Insolvency and Debt Recovery department in London. In 1990 **Mr. Blake** joined KPMG in London, spending nine years working on the liquidations of a number of banks, including several that had previously traded in the secondary market of Latin American sovereign-backed debt.

Drawing upon this experience, **Mr. Blake** moved to KPMG in the Cayman Islands in January 2000 to assist in liquidating the Cayman and British Virgin Islands (BVI) subsidiaries of one of the (at the time) largest Brazilian international banks. Staying in the Cayman Islands, **Mr. Blake** continued to work at KPMG taking many appointments as Joint Voluntary Liquidator of Cayman hedge funds and other entities. In addition, Mr. Blake played a significant role as one of the Joint Receivers of the underlying companies of a major Seven Mile Beach hotel and resort that went through a financial restructuring in 2012. More recently, **Mr. Blake** has been appointed by the Grand Court of the Cayman Islands as an Interim Administrator over a deceased person's estate. He has also acted as a Controller appointed by Cayman Islands Monetary Authority (CIMA) under the Cayman Islands Mutual Funds Law. Mr. Blake is a Notary Public.

Mr. Blake was appointed as a Member effective 1 May 2021 for a four year term.



Mr. Richard Addlestone is Senior Counsel at Dart. He has almost thirty years of professional experience, the last eighteen of those being in Cayman working as a partner with Walkers, Appleby, and Bedell (formerly Solomon Harris). Whilst in private practice Mr. Addlestone focused primarily on private equity, investment funds, and transactional work with a secondary focus on banking and finance, as well as captive insurance and reinsurance. Prior to relocating to Cayman Mr. Addlestone practiced as an English solicitor at Paisner &

Co (now Bryan Cave Leighton Paisner), LeBoeuf Lamb Greene & MacRae (subsequently, Dewey & LeBoeuf) and Denton Wilde Sapte (now Dentons).

Mr. Addlestone is a member of the Law Society of England and Wales, a past member of the executive of the Cayman branch of the Alternative Investment Management Association and a former member of the Financial Services Legislative Committee's Sub-Committee for the Companies Law. He was recently appointed to the Cayman Islands Attorneys Regulation Authority. During his professional career Mr. Addlestone was heavily involved in training Caymanian attorneys and educating Cayman school children about the legal world as part of a programme sponsored by the law firm he was working with, and with university students visiting from Elon University about how the Cayman Islands operates as an Offshore Financial Centre.

Throughout his time in the Cayman Islands he has participated in community charitable, cultural, and civic affairs ranging from financially supporting various bodies such as Red Cross, CCMI, the National Trust, the Queen Elizabeth II Botanic Park, the Cayman Islands Arts Festival, and others. He has played the violin with the Cayman Islands National Orchestra and other musical ensembles for charitable fundraising events, delivered meals for Meals on Wheels, and volunteered in lionfish culls in Little Cayman, and for the Sister Islands Rock Iguana Preservation Programme.

Mr. Addlestone was appointed as a Member effective 1 May 2021 for a four year term. Mr. Addlestone resigned effective 10 October 2022.