ACC

ANTI-CORRUPTION COMMISSION

CAYMAN ISLANDS

Annual Report

1 July 2022 – 30 June 2023

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Statement from the Chairman

On 28th October 2022 at the conclusion of a Grand Court trial lasting almost 3 months the jury unanimously convicted Canover Watson and Bruce Blake of offences under the Anti-Corruption Act, the Proceeds of Crime Act and the Penal Code. Sentences of imprisonment totalling 8 years and 2 years, respectively, were subsequently imposed. Both men held pivotal positions of trust within the structure of international football, representing both the Cayman Islands and the Caribbean region, whilst also holding professional positions as certified accountants (and, in the case of one defendant, also as an attorney-at-law).

The convictions represent a very positive outcome to a complex and protracted investigation, initiated by the Anti-Corruption Commission (the "ACC" or the "Commission"), which took over 7 years of intensive work to bring to a conclusion, involving enquiries conducted in multiple overseas jurisdictions including Pakistan, Switzerland, Germany, Panama and the United States.

The convictions demonstrate the ACC'S commitment to investigating allegations of corruption at the highest level. Moreover, it is important to note that the actions of the ACC can have a much broader significance for the Cayman Islands than simply investigating local corruption for a domestic audience. In particular, the ACC continues to take an important role within the Cayman Islands' actions aimed at the removal of the Cayman Islands from the Financial Action Task Force "Grey List" and its broader anti-money laundering strategy. The ACC convictions of Watson and Blake represent significant evidence of the Cayman Islands' determination to prosecute international money laundering and the case has featured prominently in discussions with the FATF "Joint Group" which continues to evaluate the Cayman Islands.

The ACC is also currently prosecuting/investigating several other cases involving corruption which, whilst yet to be concluded, have been included within the Cayman Islands' submissions to the FATF as providing further evidence of the commitment of the jurisdiction to combat money laundering.

Additionally, following on from several successful prosecutions, the ACC continues to pursue the confiscation of the proceeds of criminal conduct in a number of cases through proceedings in the Grand Court, thereby providing further evidence to the international community of the jurisdiction's commitment to removing the benefit from crime.

In all, the ACC is currently undertaking 11 investigations which have reached varying stages of completion including, but not limited to, the following:

- 11 Persons are currently on bail either to the Grand Court awaiting trial or sentencing, or to the ACC awaiting the outcome of investigations.
- 6 persons are currently awaiting the outcome of charge ruling decisions by the Office of the Director of Public Prosecutions ("ODPP").

As has been stressed in prior annual reports, much work is also undertaken by the ACC and its investigators which does not lead to charges or prosecution and is therefore largely unseen and uncredited. During the course of the year under review the ACC has investigated various serious allegations made against a number of persons, some of whom have been in positions of considerable public trust, which have led to their exoneration and no further action being taken. This once again demonstrates the ACC's commitment to conducting open minded and fair investigations which seek to either prove or disprove allegations.

Notwithstanding the investigative successes and diligence and professionalism of the ACC investigators, the broader functioning of the Commission, particularly from an administrative perspective, has faced day to day challenges which continue. These issues, which have varied causes and are not necessarily fully solvable under the current statutory structuring of the ACC, are discussed in more detail in the body of this report. Suffice it to say here that the Members of the Commission are focused on the difficulties and, to the extent that it is within their power to bring about changes, strive to ameliorate them.

For their dedication and hard work, thanks are, as ever, due to the ACC investigators and the other staff of the Commissions Secretariat. The support of other agencies and public officers, in particular the ODPP, are equally appreciated. Finally, I thank my fellow Commission Members. They are volunteers who give up a considerable amount of their time to serve the greater public good of the Cayman Islands. Too often the armchair critics belittle the persons on boards and commissions as work-shy members of a self-serving club enjoying a sinecure. Certainly in the case of the ACC this could not be further from the truth.

Adrian Pope
Chairman, Anti-Corruption Commission

Section One – The Anti-Corruption Commission ("the Commission")

1.1 Role

The Commission was created under the Anti-Corruption Act, 2008 which came into effect on 1 January 2010. The Commission is responsible for the administration of the Act, now the Anti-Corruption Act (2019 Revision) (as amended), and is a law enforcement agency in the Cayman Islands.

1.2 Anti-Corruption Act (2019 Revision) (as amended) (the "Act")

The Act gives effect to the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and to the United Nations Convention Against Corruption (which was extended to the Cayman Islands in 2020). It covers a broad range of local corruption offences by public officials, private individuals and entities. It extends to bribery of foreign public officials outside the Cayman Islands. Offences under the Act are extraditable.

1.3 Mission Statement

The mission of the Commission is "To enhance the stability, prosperity and reputation of the Cayman Islands by sustaining the confidence and trust of the community in the integrity and good governance of its government and public institutions through fighting corruption with just, fair and effective investigations."

1.4 Commission Members

The Commission consists of not less than five persons who, in the opinion of the Governor, are of high integrity and are able to exercise competence, diligence and sound judgement in fulfilling their responsibilities under the Act. Members must be residents of the Islands and may include:

a) retired judges of the Grand Court or the Court of Appeal;
b) retired police officers;
c) retired justices of the peace or magistrates;
d) chartered or certified accountants;
e) attorneys-at-law of ten or more years call or retired attorneys-at-law; and
f) such other persons as the Governor considers qualified to be appointed.

No persons may be appointed to hold office as a member of the Commission if s/he is a public officer or such other category of person as may be prescribed by Order of the Governor. The names of all members of the Commission are gazetted at the time of appointment and the Governor, after consultation with the Attorney General, may at any time revoke the membership of a member.

The names of the members of the Commission during the reporting period and at the date of submission of this Annual Report are set forth in Appendix 1.

1.5 Principal powers, duties and functions

The Commission is responsible for the administration of the Act and shall:

- Receive and consider reports to the Commission of the alleged or suspected commission of a corruption offence as set out in the Act and investigate such reports where the Commission has reason to suspect the commission of an offence or an attempt to commit an offence or a conspiracy to commit and offence;
- receive (including from overseas anti-corruption agencies) and request, analyse and disseminate disclosures of information concerning corruption offences, or suspected offences; or required by any law in order to counter corruption; and
- detect and investigate suspected corruption offences, attempts to commit an offence, or conspiracies to commit an offence.

1.6 Additional powers, duties and functions

- Arrest and search any person who has committed or is suspected of having committed a corruption offence.
- Obtain evidence by search warrants with court approval.
- Freeze assets and confiscate proceeds of corruption offences with court approval.
- Refer the results of its investigations to the Director of Public Prosecutions for disposition where it appears an offence has been committed.
- Assist with overseas investigations.
- Enter into assistance arrangements with overseas anti-corruption agencies with the consent of the Attorney General.
- Enter into assistance arrangements with any local law enforcement authority, or local body, for the discharge of performance of its powers, duties and functions.
- Advise the Governor on the Commission's work.
- Submit an annual report to the Governor.

1.7 Control, Oversight, and Policy Directions

The Governor has broad powers of oversight over the work of the Commission and may direct the Commission on the policy to be followed in the exercise and performance of its functions. To date, the Governor has not issued any such directions.

The Commission may issue guidelines setting out:

- the forms and procedures for making a report of a corruption offence; and
- the operational procedures in connection with disclosures made to the Commission.

The Commission has issued a reporting form and guidelines on the procedures. These can be found on the Commission's website: www.anticorruptioncommission.ky

Section Two – Breaches of the Act

2.1 General Overview

The Commission receives reports of alleged breaches under the Act through direct communication to the Commission; requests for mutual assistance from overseas; and those reported to other law enforcement agencies and referred to the Commission. In each case, the allegation is fully recorded and a decision taken as to what, if any, further investigation or action is appropriate.

Each allegation is assessed on its own merits. No prosecution is undertaken without the express authority of the Director of Public Prosecutions in accordance with the Act.

2.2 Corruption Offences in the Cayman Islands

Corruption can be described as abusing a position of trust to gain an undue advantage, e.g. where decisions are not taken for public benefit but rather to serve private interests.

Examples of corrupt behaviour are:

- A Public Officer (PO) or Member of Parliament (MP) uses, or tries to use, knowledge, power or resources which they have gained as a result of their position for personal gain or for the advantage of others;
- A PO or MP uses, or tries to use, their position to interfere with justice, to commit an offence or to prevent an offence being detected or punished;
- A PO or MP acts dishonestly or unfairly, or breaches the trust of the public or abuses their office;
- A member of the public influences, or tries to influence, a PO, MP or foreign PO or foreign equivalent of an MP to use his or her position in a way that is dishonest, unfair or breaches public trust.

2.3 Offences under the Act

The principal offences are set out in Appendix 2.

Section Three – Reporting Corruption

3.1 Making a Report/Complaint

Anyone who reasonably believes or suspects that there has been an act of corruption in breach of the Act should complete and submit a Report/Complaint Form to the Commission. Reports/Complaints should be made as soon as reasonably practicable after becoming aware of the conduct in question.

3.2 Duty to Report

Individuals should be aware of the principles that guide the performance of public officers in the conduct of their duties. Public officers may incur criminal liability for corruption as follows:

- **Those directly involved:** A person who is directly involved in committing a corruption offence may be liable for the offence.
- **Those indirectly involved:** A person may be liable for a corruption offence where s/he is indirectly involved in committing the offence.
- **Failure to act:** An individual may be liable for a corruption offence even where s/he was not directly involved in committing the offence, but was wilfully blind to it.
- **Aiding and abetting:** An individual may also be liable for aiding and abetting where he has aided or assisted in the committing of the offence.

3.3 Submission of Reports/Complaints

Reports/Complaints should be submitted to the Commission via the Senior Investigating Officer of the Commission (the "SIO") to the following contact details:-

Phone: 1-345-244-3685
Website: www.anticorruptioncommission.ky
E-mail: info@anticorruptioncommission.ky; or richard.oliver@gov.ky;
Mailing Address: P.O. Box 391 KY1-1106
Physical Address: 4th Floor George Town Financial Center, #90 Fort Street, George Town, Grand Cayman, CAYMAN ISLANDS

Should any member of the Commission receive a report/complaint it will be forwarded to the SIO. Members of the public making reports/complaints are encouraged to use the Report/Complaint Form whenever possible. The SIO or any member of the Commission receiving a verbal report/complaint by telephone call or otherwise should also complete the Report/Complaint Form (or a functionally equivalent written document containing all material facts) for submission to the Commission.

3.4 Confidentiality

The Commission will keep confidential any information that it receives or acquires during the course of its work or duties except in the exercise of the Commission's functions under the Act or otherwise required by law or order of a competent court. It will ensure that it deals with information appropriately and uses it only for the proper purposes of the Commission.

3.5 Conflicts of Interest

The work of the Commission will not be compromised or affected by any personal interest of Members or staff. The public interest comes first on all such occasions. Conflicts of interest, or the perception that they have arisen or may arise, can do great damage to the reputation of the Commission and its staff. Members and staff must declare to the Commission any conflicts or potential conflicts of interest immediately. The Commission has appropriate procedures for dealing with any such conflicts. In the event of any conflict of interest or perceived conflict of interest, the relevant Member or staff will recuse himself/herself from all consideration of the matter in question and shall not be entitled to any information regarding the disposition of the matter by the Commission.

3.6 Code of Conduct

The Members of the Commission have adopted the Code of Conduct promulgated by the Commission for Standards in Public Life. Members continue to uphold, promote and undertake to be bound by seven core principles, known as the Nolan Principles, which form the basis of a universal standard of good governance. Members also submit annual declarations of interest as required under the Standards in Public Life Act.

3.7 Protection of Providers of Information

The Commission will make every effort to protect, as far as legally possible, the identity of those providing information to the Commission. The Commission will encourage a caller, if the information is to be taken verbally, to identify him/herself and provide contact details as it is may be necessary in the future to seek additional information or clarification of information received. Information provided by a caller in such a manner will also be submitted to the Commission in a Report/Complaint Form completed by the SIO. The Commission will continue to vigorously support, encourage and protect witnesses, including, where necessary, by prosecuting persons who make threats against a witness.

3.8 Records

The Commission will keep records of all aspects of the investigation. These records will be kept confidential, except when otherwise required or permitted by law or any competent court.

3.9 Referral to the Director of Public Prosecutions

The Commission will refer the results of its investigations to the Director of Public Prosecutions for disposition where it appears that behaviour amounting to an offence under the Act, or any other offence, has been committed. This will include all relevant information and evidence known to the investigators.

Section Four – 2022 – 2023 Corruption Statistics

The Commission has a duty to safeguard the confidentiality and integrity of information, to respect the rights of individuals and not to prejudice investigations/proceedings. These must be balanced against the duty to be open and transparent wherever reasonably possible.

The policy of the Commission is compliant with the recommendations of the Leveson Inquiry. It is the policy of the Commission not to release the names of persons who are arrested, unless there are exceptional circumstances, e.g.:-

- threat to life;
- prevention or detection of crime; or
- a matter of significant public interest.

At the time of arrest, the Commission will normally provide the following non-identifiable information about persons arrested:-

- age;
- gender;
- resident district;
- offence(s); and
- whether or not the individual is a public official.

For example, "a 48 year old male, who is a public official, from the district of George Town has been arrested on suspicion of bribery, fraud and money laundering".

It is the policy of the Commission to name persons once charged. The following information will be released about an adult, providing there are no applicable legal restrictions:-

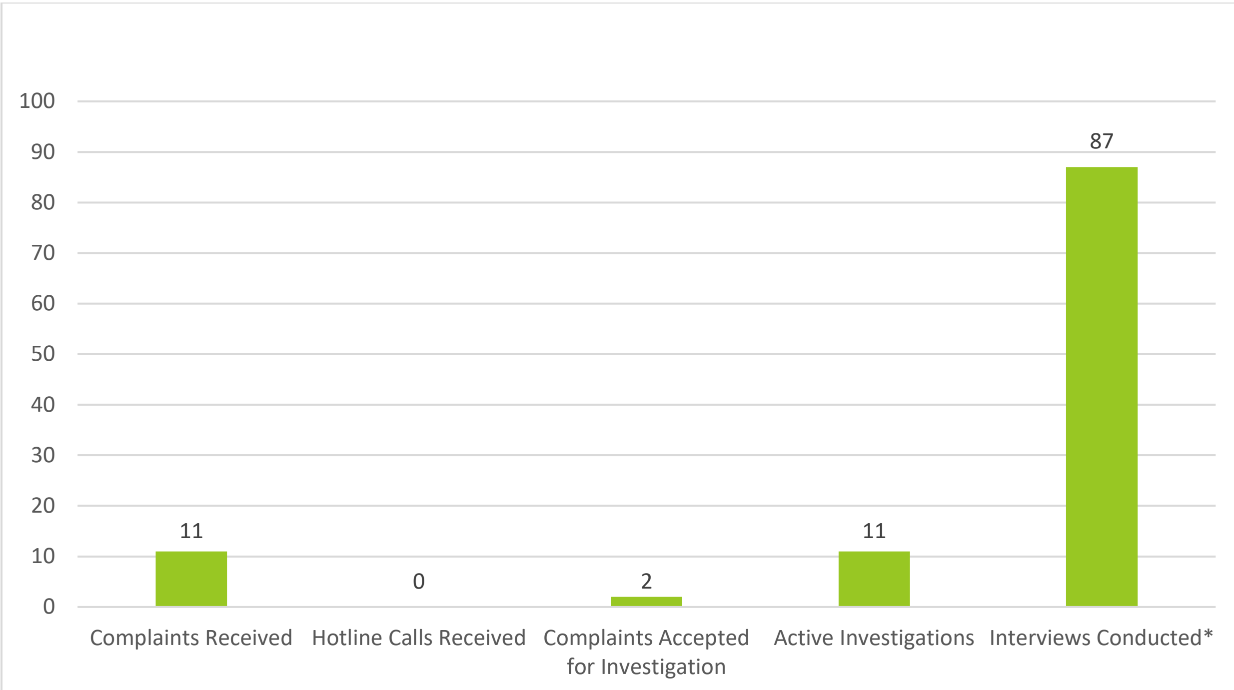
- name;
- occupation;
- resident district; and
- charge details.

For example, "Ms. XYZ, Consultant, from the district of Bodden Town, has been charged with bribery, fraud and money laundering".

A general statement on the ACC's policy on public comments regarding investigations can be found on the Commission's website. These policies of general application will always be subject to the specifics of each matter and overall public interest.

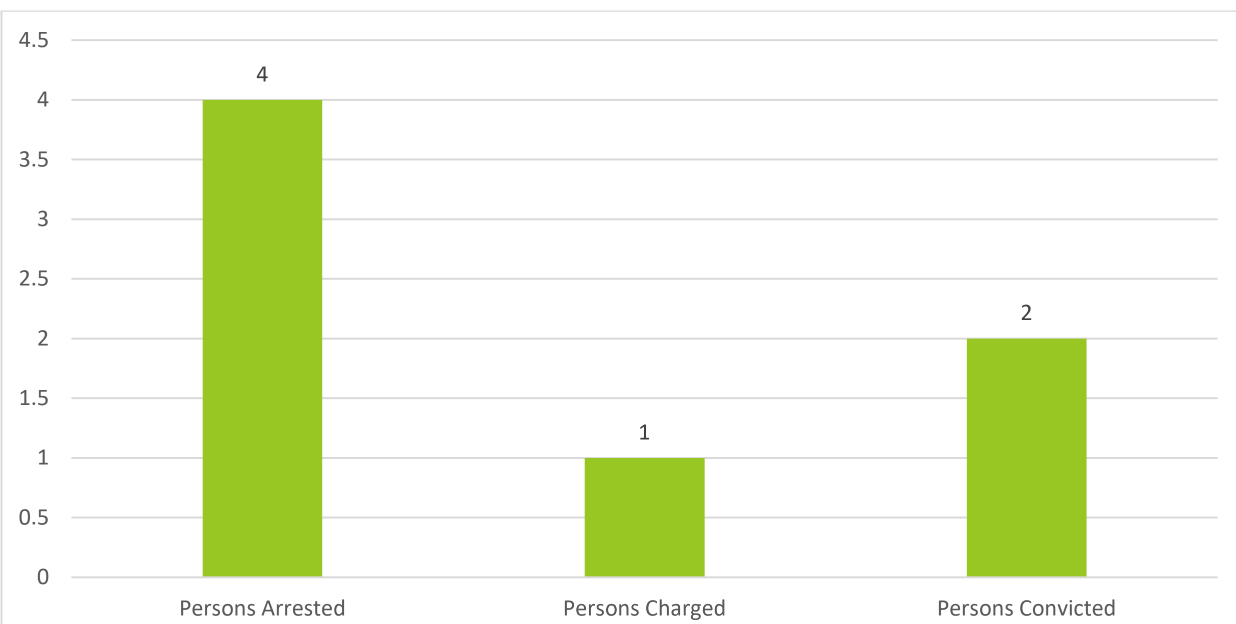
Summary of Cases 2022 – 2023

Complaints, Investigations and Interviews

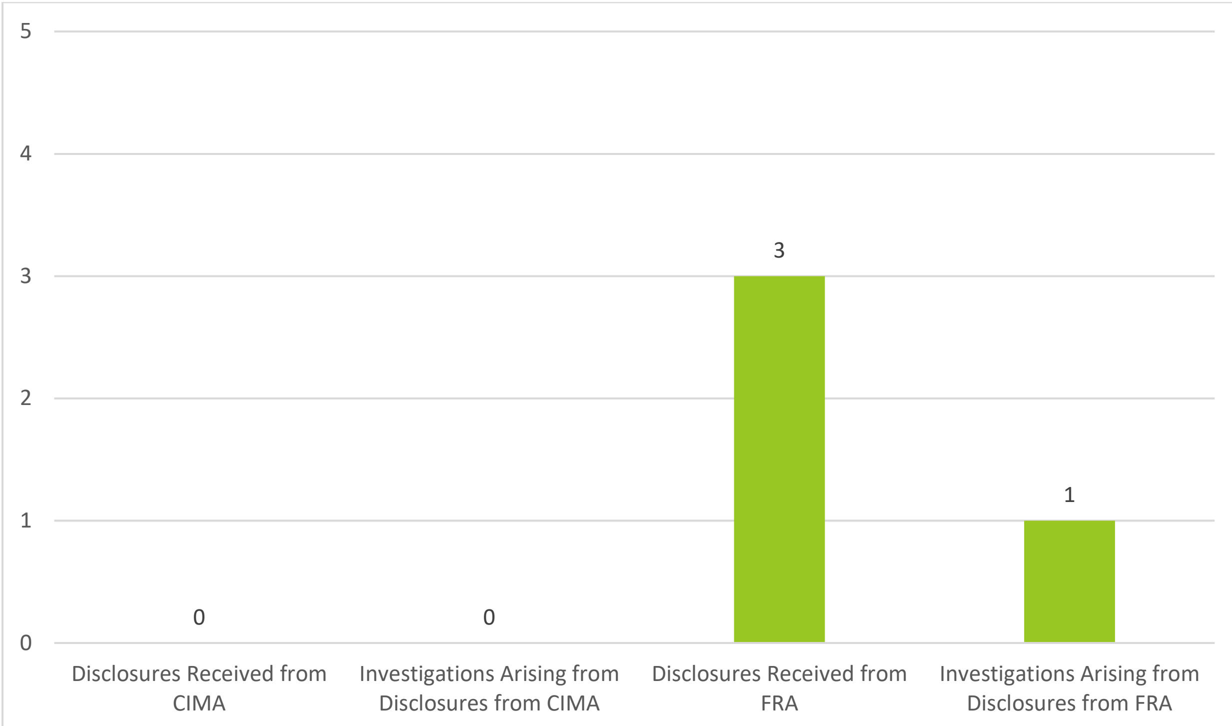


*****Interviews conducted = 11 suspects, 76 witnesses

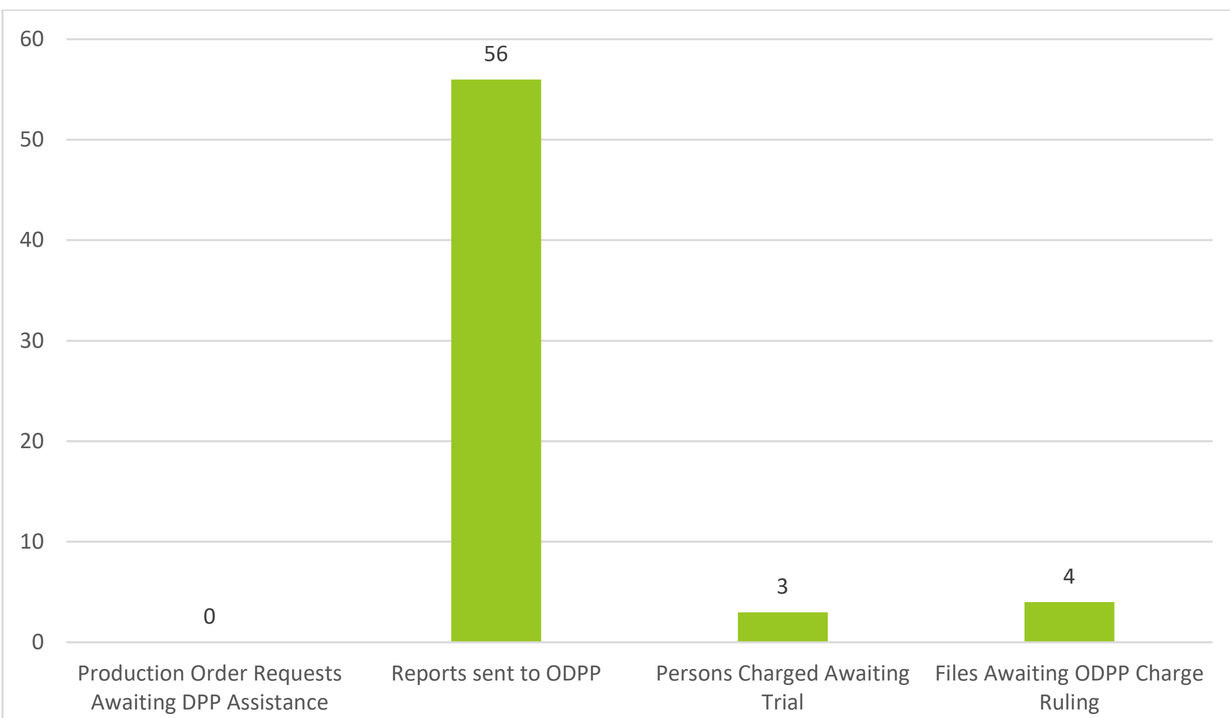
Arrests, Charges and Convictions 2022 - 2023



Interactions with Local Entities 2022-2023



Interactions with the Office of the Director of Public Prosecutions 2022 – 2023



In compliance with section 4(2)(f) of the Anti-Corruption Act, the ACC publishes the following information relating to disclosures for this reporting period:

- received 3 disclosures; and
- sent 0 disclosures.

***Amendment to Methodology: Prior to the 2020-2021 Annual Report the methodology for calculating the number of 'reports sent to Office of the Director of Public Prosecutions' (ODPP) was based solely on the number of requests for charge rulings or requests for legal advice, usually at the conclusion of the collection of evidence both for and against the subject of the investigation. However, this figure was not representative of the amount of work required by ODPP in support of the ruling file, mostly during the preparation and presentation for a Grand Court trial. This methodology was therefore adjusted in the 2020-2021 Annual Report going forward to take these factors into account.

Section Five – Topical Issues

5.1 Legislation

During the current reporting period various amendments to the Act, as contained in the previously reported Anti-Corruption (Amendment) Bill, were duly enacted and the amendments to the Act came into effect in January 2023. The Commission will continue to consider proposing further amendments to the Act as and when considered necessary or desirable.

5.2 Commission Membership

Shortly after the conclusion of the last reporting period, the term of office of two members (including the then Chairman) expired and the term of office of a third member expired before the end of 2022. During the current reporting period four new Members were appointed, together with a new Chairman. The particulars are set forth in Appendix 1.

5.3 Financial Action Task Force ("FATF") Related Updates

The Chairman continues to attend meetings of the Cayman Islands Anti-Money Laundering Steering Group and the SIO (and other investigators) continue to attend FATF-related meetings (both in the Cayman Islands and overseas) as required. As noted in the Chairman's statement, this year the ACC was a particularly active participant in the jurisdiction's efforts aimed at the removal of the Cayman Islands from the FATF "Grey list" and the ACC's actions featured prominently within presentations made to the FATF "Joint Group" which continues to evaluate the Cayman Islands. Both the Chairman and the SIO attended the plenary meeting of the Caribbean Financial Action Task Force which was hosted by the Cayman Islands in late 2022 with approximately 300 attendees. The Secretariat will continue to submit quarterly statistics as required.

5.4 Memoranda of Understanding ("MOUs")

During the reporting period new MOUs were entered into with the Office of the Ombudsman and with Workforce Opportunities and Residency Cayman to facilitate inter-agency cooperation. The existing MOU with the Royal Cayman Islands Police Service in relation to its database was renewed.

Following the introduction of a new Section 28A in the Act, a standard protocol for information requests from the Commission to telecommunications providers was developed.

5.5 Training and Development

Regular training and development initiatives are explored and implemented to further enhance the work of the Commission.

In January 2023 the Chairman and the SIO attended a workshop for the National Intelligence Committee designed to foster inter-agency cooperation.

In January 2023 the immediate past Chairman and the Manager were invited to attend the Customs and Border Control (CBC) graduation ceremony in recognition of the support given by the former Chairman and the Manager during the CBC Officer Basic Training Course.

In April 2023 the SIO attended the conference of the International Anti-Corruption Coordination Centre, the Manager attended (virtually) the conference of the Commonwealth Caribbean Association of Integrity Commissions and Anti-Corruption Bodies, and two of the ACC Investigators attended training in Curacao on financial investigation techniques from the Egmont Centre of FIU Excellence and Leadership.

5.6 Official Meetings

During the reporting period the Chairman and/or Members held meetings, as and when appropriate, with various officials to discuss matters of mutual interest. These included meetings with H.E. the Governor (both immediate past, and current), the DPP, the Ombudsman and the National Intelligence Coordinator.

In January 2023 the Chairman, together with the Chairman of the Constitutional Commission, met with academics from the United Kingdom who were undertaking a study on behalf of the Commonwealth Parliamentary Association to review its elections observations processes in the British Overseas Territories and Crown Dependencies.

5.7 Assessment of ACC Re: Jakarta Principles

The last two annual reports have referred to the “Jakarta Principles” and the desire of the ACC to be assessed against these. The background is as follows. The Jakarta Principles is a document which was adopted following a conference of international anti-corruption agencies in 2012 and the more extensive Colombo Commentary on the Jakarta Principles was adopted following a further conference in 2018. These UN-supported documents arise out of the desire of the Conference of the States parties to the UN Convention against Corruption to provide guidance on the implementation of the aspects of that Convention that relate to the establishment and operation of national anti-corruption agencies (“ACAs”). Accordingly, they set out what are regarded by the international community as best practices for the organisation and operation of ACAs such as the Cayman Islands ACC. For reference, the sixteen “principles” are listed in Appendix 3 to this annual report.

ACAs are encouraged to assess themselves against the Jakarta Principles to determine the extent to which they comply with them.

During the current reporting period the ACC was finally able to retain external counsel to undertake this assessment and a report (the “Jakarta Principles Assessment”) was delivered to the ACC at the end of 2022. The Commission is still digesting the document and considering appropriate next steps. However, in those areas which are fully within the control of the Commission under its existing structure the Commission has begun to address certain of the recommendations of the assessment. That said, it should be noted that in the case of more than half of the principles, if all recommendations were to be implemented (some of which would be far-reaching) there would need to be legislative change and, therefore, even if politically acceptable, few changes to the current operations of the ACC are likely in the short to medium term.

5.8 Educational Outreach and Presentations

As identified in the Jakarta Principles Assessment, the current statutory mandate of the ACC is focused on detection and investigation. There is no express mandate to tackle corruption through prevention, education and awareness training. The current Commission Members strongly believe in the potential value of such activities. However, in the absence of a clear mandate and resources, concrete actions will remain, as they have been over the life of the ACC, ad hoc and sporadic (and, occasionally, even subject to pushback by public officials who may argue that, in the absence of an express statutory mandate, the ACC has no business engaging in such activities). Although the post of a Public Relations and Education Coordinator to support all six Commissions served by the Commissions Secretariat was created in 2020, at least in the case of the ACC no substantive materials were produced during the period of this report and, indeed, the post was unstaffed during much of that period. Although the current ACC remains committed to the ideals, in the short term it must be assumed there is unlikely to be much change or improvement in this area.

5.9 Commission Structure, Staffing and Resources

As alluded to in the Chairman's statement, the day-to-day administration of the affairs of the Commission has not been without challenges during the period of this report. Reasons include resource constraints and structural issues.

It is important to note that the ACC does not have its own dedicated administrative staff. Rather, the Commissions Secretariat (the "Secretariat"), which is part of the Portfolio of the Civil Service ("PoCS"), is charged with providing administrative support to six different commissions, of which the ACC is but one. Historically, save for the investigators (who are themselves technically part of the Secretariat, not the ACC), individual Secretariat staff were not assigned exclusively to a specific commission or commissions. Accordingly, at any given moment individual commissions compete with each other for the attention of staff members, and detailed expertise in the precise, and often different, needs of an individual commission is not easily gained by any specific staff member.

Staff turnover, understaffing, a lack of clear processes to capture institutional knowledge and sometimes a seeming lack of a sense of urgency from other government departments whose administrative assistance may be required, all contribute to a less than optimum outcome.

The ACC is not alone among the commissions supported by the Secretariat in feeling a sense of frustration that matters do not always progress as smoothly or expeditiously as they should. During the period of this report PoCS has undertaken a review of the structure and functions of the Secretariat, and the ACC awaits the results of this review with interest. It must be stressed, however, for the avoidance of doubt, that the staff members of the Secretariat who have occasion to work on ACC matters work diligently and their efforts are greatly appreciated by the Members of the Commission.

It is arguable that the root of some of the difficulties encountered is the formal structure of "the ACC". In essence there are three distinct groups of people, all of whom may loosely be considered part of the ACC. First, there are the Members of the Commission, who are part-time volunteers. Secondly, there are the investigators, who are full-time seasoned professionals. Finally, there is the Secretariat which operates as described above. The ACC does not employ the investigators (who are technically part of the Secretariat, as also mentioned above) nor the administrative staff of the Secretariat who may work on ACC matters. Accordingly, from an employment perspective, the Members of the Commission have no formal input into the appointment of investigators or administrative staff and do not supervise them. They are ultimately supervised, from an employment perspective, within the hierarchy of PoCS.

Equally, the ACC does not have its own budget. Rather, the Secretariat as a whole has a budget, albeit one which includes a separate and distinct provision for the ACC investigators. The ACC Commission Members have no meaningful involvement in the establishment of the budget.

Three of the Jakarta Principles which are clearly relevant here are those relating to "Authority over Human Resources", "Adequate and Reliable Resources" and "Financial Autonomy", all of which will require serious consideration in due course.

In the long term, consideration must be given to whether a different (and better) legal and operational structure needs to be found for the ACC in light of some of the issues highlighted in this report. Arguably the ACC (perhaps in combination with the Standards in Public Life Commission) should (in a manner more akin to the Office of the Ombudsman) be a stand-alone entity with its own premises, budget and employees. Equally, there may be a strong argument for such a body being run, on a day-to-day basis, by a full-time executive director with years of relevant experience in the anti-corruption field. That individual can give focus and appropriate supervision of and direction to employees. He or she can also take responsibility for, and drive forward the implementation of, projects and new ideas in a more sustained and thorough manner than is possible within the current system of only being able to rely on the good intentions and understandably finite efforts of rotating part-time volunteer Commission Members supported by administrative staff who are themselves only dedicated to the ACC on a part-time basis.

Section Six – Moving Forward

During the next reporting period, the Commission will continue to:

a. work diligently to process reports/complaints and carry through investigations to their conclusion;
b. support the fulfilment of the CFATF recommendations;
c. analyse, and work towards compliance with, the Jakarta Principles;
d. seek to enhance the independence and support of the Commission;
e. explore ways to deliver more public education about corruption with a view to its prevention; and
f. seek to enhance its working relationships with other relevant commissions and government agencies.

Dated this 1st day of September 2023.

Adrian Pope (Chairman)

Kendra Foster

Simon Whicker

Romeo Frederick

Laurence Aiolfi

Charles Jennings

Appendix 1 – Members of the Commission

The following persons are the current Members of the Commission at the date of submission of this Annual Report and are the signatories thereof. Where they have served for less than the entire reporting period, this is noted:

Adrian (Gus) Pope (Chairman since August 2022)

Simon Whicker

Laurence Aiolfi (Member since August 2022)

Kendra Foster (Member since August 2022)

Romeo Frederick (Member since August 2022)

Charles Jennings (Member since August 2022)

The following former Members of the Commission served during part of the reporting period:

Sophia-Ann Harris (term ended August 2022)

Kadi Pentney (term ended August 2022)

Kenrick Hall (term ended December 2022)

Appendix 2 – Offences under the Act

Bribery of public officers and members of Parliament

10. (1) A public officer or a member of Parliament who directly or indirectly-

(a) solicits;

(b) accepts or obtains; or

(c) agrees to accept or obtain, for himself or any other person, any loan, reward, advantage or other benefit with intent-

(d) to interfere with the administration of justice;

(e) to procure or facilitate the commission of an offence; or

(f) to protect from detection or punishment a person who has committed or who intends to commit an offence, commits an offence.

(2) Any person who gives or offers to a public officer or to a member of Parliament any loan, reward, advantage or other benefit, with intent that the public officer should do anything mentioned in subsection (1)(d),(e), or (f) commits an offence.

(3) A person who commits an offence under this section is liable on conviction on indictment to imprisonment for a term of fourteen years.

Frauds on the Government

11. (1) A person commits an offence where-

(a) directly or indirectly-

(i) he gives, offers or agrees to give or offer to-

(A) a public officer;

(B) a member of Parliament;

(C) a member of the family of a public officer;

(D) a member of the family of a member of Parliament; or

(E) any person for the benefit of a public officer, a member of Parliament or another person; or

(ii) being a public officer or a member of Parliament, he demands, accepts or offers or agrees to accept from any other person for himself or another person, a loan, reward, advantage or other benefit as consideration for cooperation, assistance, exercise of influence or an act or omission in connection with-

(A) the transaction of business with or any matter or business relating to the Government; or

(B) a claim against the Government or any benefit that the Government is authorised or is entitled to bestow, whether or not, in fact, the public officer or member of Parliament is able to cooperate, render assistance, exercise influence or do or omit to do what is proposed, as the case may be;

(b) having dealings of any kind with the Government, he pays a commission or reward to or confers an advantage or benefit of any kind on a member of Parliament or a public officer of a government entity with which he deals, or to any member of the family of a member of Parliament or a public officer, or to any one for the benefit of the member of Parliament or the public officer, with respect to those dealings, unless he has the consent in writing of the chief officer of the government entity with which he deals, the proof of which lies on him;

(c) being a public officer or a member of Parliament, he demands, accepts or offers or agrees to accept from a person who has dealings with the Government a loan, reward, advantage or other benefit directly or indirectly, by himself or through a member of his family or through any one for his benefit, unless he has the consent in writing of the chief officer of the government entity that employs him or of which he is an official, the proof of which lies on him;

(d) having or pretending to have influence with the Government, with a member of Parliament or a public officer, he demands, accepts or offers or agrees to accept for himself or another person a loan, reward, advantage or other benefit as consideration for cooperation, assistance, exercise of influence or an act or omission in connection with-

(i) anything mentioned in paragraph (a)(iii) or (iv); or

(ii) the appointment of any person, including himself, to an office;

(e) he gives, offers or agrees to give or offer to a member of the Legislative Assembly or a public officer a loan, reward, advantage or other benefit of any kind as consideration for cooperation, assistance, exercise of influence or an act or omission in connection with-

(i) anything mentioned in paragraph (a)(iii) or (iv); or

(ii) the appointment of any person, including himself, to an office; or

(f) having made a tender to obtain a contract with the Government-

(i) he gives, offers or agrees to give or offer to another person who has made a tender or to a member of that person's family, or to another person for the benefit of that person, a reward, advantage or other benefit as consideration for the withdrawal of the tender of that person; or

(ii) he demands, accepts or offers or agrees to accept from another person who has made a tender a loan, reward, advantage or other benefit as consideration for the withdrawal of his tender.

(2) A person who commits an offence under this section is liable on conviction on indictment to imprisonment for a term of ten years.

Contractor subscribing to election fund

12. (1) A person who, in order to obtain or retain a contract with the Government, or as a term of any such contract, whether express or implied, directly or indirectly subscribes or gives, or agrees to subscribe or give, to any person any loan, reward, advantage or other benefit-

(a) for the purpose of promoting the election of a candidate or a class or party of candidates to Parliament; or
(b) with intent to influence or affect in any way the result of an election conducted for the purpose of electing persons to serve in Parliament, commits an offence.

(2) A person who commits an offence under this section is liable on conviction on indictment to imprisonment for a term of ten years.

Breach of trust by public officer or by a member of Parliament

13. A public officer or a member of Parliament who, in connection with the duties of his office, commits fraud or a breach of trust is liable on conviction on indictment to imprisonment for a term of five years, whether or not the fraud or breach of trust would be an offence if it were committed in relation to a private person.

Selling or purchasing office

14. A person who-

(a) purports to sell or agrees to sell an appointment to or a resignation from a public office, or a consent to any such appointment or resignation, or receives or agrees to receive a reward or profit from the purported sale thereof; or
(b) purports to purchase or gives a loan, reward, advantage or other benefit for the purported purchase of any such appointment, resignation or consent, or agrees or promises to do so, commits an offence and is liable on conviction on indictment to imprisonment for a term of five years.

Influencing or negotiating appointments or dealing in offices

15. A person who-

(a) receives, agrees to receive, gives or procures to be given, directly or indirectly, a loan, reward, advantage or other benefit as consideration for cooperation, assistance or exercise of influence to secure the appointment of any other person to a public office;
(b) solicits, recommends or negotiates in any manner with respect to an appointment to or resignation from a public office, in expectation of a direct or indirect loan, reward, advantage or other benefit; or
(c) keeps without lawful authority, the proof of which lies on him, a place for transacting or negotiating any business relating to-
   (i) the filling of vacancies in public offices;
   (ii) the sale or purchase of public offices; or
   (iii) appointments to or resignations from public offices, commits an offence and is liable on conviction on indictment to imprisonment for a term of five years.

False claims by public officers

16. A public officer who-

  (a) is employed in such a capacity as to require him or enable him to furnish returns or statements relating to any sum payable or claimed to be payable to himself or to any other person, or relating to any other matter required to be certified for the purpose of any payment of money or delivery of goods to be made to any person; and
  (b) makes a return or statement relating to any such matter which is, to his knowledge, false in any material particular, commits an offence.

Abuse of office

17. (1) A public officer or a member of Parliament who intentionally does, or directs to be done, in abuse of the authority of his or her office, any arbitrary act prejudicial to the rights of another person commits an offence and is liable on conviction on indictment to imprisonment for a term of four years.

(2) If a public officer or a member of the Parliament intentionally does, or directs to be done, the act under subsection (1) for the purposes of a loan, reward, advantage or other benefit, the public officer or the member of Parliament commits an offence and is liable on conviction on indictment to imprisonment for a term of five years.

False certificates by public officers or by members of Parliament

18. A public officer or a member of Parliament who is authorised or required by law to give any certificate relating to any matter by virtue whereof the rights of any person may be prejudicially affected, gives a certificate which is, to his knowledge, false in any material particular, commits an offence.

Conflicts of interests

19. (1) Where a government entity proposes to deal with a company, partnership or other undertaking in which -

  (a) a public officer of the entity;
  (b) a member of Parliament; or
  (c) a member of the family, or an associate, of any person specified in paragraphs (a) or (b), has a direct, indirect or beneficial interest in such company, partnership or undertaking; or
  (d) any person specified in paragraphs (a), (b) or (c) holds more than ten per cent of the total issued share capital or of the total equity participation in such company, partnership or other undertaking, the public officer or the member of the Legislative Assembly shall forthwith disclose, in writing, to that government entity, the nature of such interest.

(2) Where in relation to a government entity -

(a) a public officer of the entity;
(b) a member of Parliament; or
(c) a member of the family, or an associate, of either the public officer or the member of Parliament, has a personal interest in a decision which the government entity is to take, that public officer or member of Parliament shall forthwith disclose, in writing, to the government entity, the nature of that personal interest.

(3) A public officer or member of Parliament who fails to disclose an interest in accordance with subsection (1) or (2) and who votes or otherwise takes part in proceedings or decisions of the government entity relating to such interest commits an offence and is liable on conviction on indictment to imprisonment for a term of five years.

Duty of a public officer and member of Parliament to who a bribe is offered etc.

20. (1) A public officer or a member of Parliament to whom any loan, reward, advantage or other benefit is given, promised, or offered, in contravention of any provision of this Act shall, at the earliest opportunity thereafter, report to the Commission such loan, reward, advantage or other benefit together with the name, if known, of the person who gave, promised or offered such loan, reward, advantage or other benefit to him.

(2) A person who fails to comply with subsection (1) commits an offence and is liable on summary conviction to a fine of twenty thousand dollars or to imprisonment for a term of two years or to both.

(3) A person from whom any loan, reward, advantage or other benefit has been solicited or obtained, or an attempt has been made to obtain such loan, reward, advantage or other benefit, in contravention of any provision of this Act shall, at the earliest opportunity thereafter, report such soliciting or obtaining of, or attempt to obtain, the loan, reward, advantage or other benefit together with the full and true description and, if known, the name of the person who solicited, or obtained, or attempted to obtain, the loan, reward, advantage or other benefit from him to the Commission.

(4) A person who fails, without reasonable excuse, to comply with subsection (3) commits an offence and is liable on conviction on indictment to a fine of ten thousand dollars or to imprisonment for a term of two years or to both.

(5) A public officer or a member of Parliament who has reasonable cause to believe that another public officer or a member of Parliament has-

(a) solicited;
(b) accepted or obtained; or
(c) agreed to accept or obtain;

any loan, reward, advantage or other benefit in contravention of any provision of this Act, shall, at the earliest opportunity thereafter, report such belief to the Commission and shall provide the name, if known, of the person who gave, promised or offered such loan, reward, advantage or other benefit to the public officer or the member of the Legislative Assembly.

(6) A person who fails, without reasonable excuse, to comply with subsection (5) commits an offence and is liable on conviction on indictment to a fine of ten thousand dollars or to imprisonment for a term of two years or to both.
(7) A person who commits an act of victimisation against a person who has made a disclosure under subsection (1), (3) or (5) commits an offence and is liable on summary conviction to imprisonment for a term of two years.
(8) In this section, “victimisation” means an act-
(a) which causes injury, damage or loss;
(b) of intimidation or harassment;
(c) of discrimination, disadvantage or adverse treatment in relation to a person’s employment; or
(d) amounting to threats of reprisals.

Secret commissions

21. (1) A person commits an offence who-
(a) gives, offers or agrees to give or offer to an agent any loan, reward, advantage or other benefit as consideration for doing or forbearing to do, or for having done or forborne to do, any act relating to the affairs or business of his principal or for showing or forbearing to show favour or disfavour to any person with relation to the affairs or business of his principal; or
(b) being an agent, demands, accepts or offers or agrees to accept from any person any loan, reward, advantage or other benefit as consideration for doing or forbearing to do, or for having done or forborne to do, any act relating to the affairs or business of his principal or for showing or forbearing to show favour or disfavour to any person with relation to the affairs or business of his principal; or
(c) with intent to deceive a principal, gives to an agent of that principal, or, being an agent, uses with intent to deceive his principal, a receipt, an account or other writing-
(i) in which the principal has an interest;
(ii) that contains any statement that is false or erroneous or defective in any material particular; and
(iii) that is intended to mislead the principal.
(2) A person who commits an offence under this section is liable on conviction on indictment to imprisonment for a term of five years.

Bribing a foreign public officer

22. (1) Subject to sections 23 and 24, a person who, in order to obtain or retain an advantage in the course of business, directly or indirectly promises, gives, offers or agrees to give or offer a loan, reward, advantage, or benefit of any kind to a foreign public officer for his benefit or for the benefit of another person or to any person for the benefit of a foreign public officer-

(a) as consideration for an act or omission by the foreign public officer in connection with the performance of the officer's duties or functions; or

(b) to induce the foreign public officer to use his position to influence any acts or decisions of the foreign country or public international organisation for which the officer performs duties or functions, commits an offence.

(2) A person who contravenes subsection (1) is liable on conviction on indictment to imprisonment for a term of fourteen years.

(3) Where it appears to the Director of Public Prosecutions that any person to which this section applies, or an officer, director, employee, agent, or stockholder thereof, is engaged, or about to engage, in any act or practice which contravenes subsection (1), the Director of Public Prosecutions may, in his discretion, apply to the Grand Court for an order to enjoin such act or practice, and the court may, if it is satisfied upon the evidence, that such person is so engaged or is about to be so engaged as alleged, order a permanent injunction or a temporary restraining order without requiring a bond.

Savings provision relating to section 22

23. A person has not committed an offence under section 22 if the loan, reward, advantage or other benefit-

(a) is permitted or required under the laws of the foreign country or public international organisation for which the foreign public officer performs duties or functions; or

(b) was made to pay the reasonable expenses incurred in good faith by or on behalf of the foreign public officer that are directly related to-

(i) the promotion, demonstration or explanation of the person's products and services; or

(ii) the execution or performance of a contract between the person and the foreign country for which the officer performs duties or functions.

Facilitation payments

24. (1) For the purpose of section 22, a payment is not a loan, reward, advantage or other benefit to obtain or retain an advantage in the course of business, if -

(a) the value of the payment is small;

(b) it is made to expedite or secure the performance by a foreign public officer of any act of a routine nature that is part of the foreign public officer's duties or functions, including-

(i) the issuance of a permit, licence or other document to qualify a person to do business;

(ii) the processing of official documents, such as visas and work permits;

(iii) the provision of services normally offered to the public, such as mail pick-up and delivery, telecommunication services and power and water supply; and

(iv) the provision of services normally provided as required, such as police protection, loading and unloading of cargo, the protection of perishable products or commodities from deterioration or the scheduling of inspections related to contract performance or transit of goods; and

(c) as soon as practicable after the payment and the act of a routine nature performed by the foreign public officer occurred, the person made a record of the payment and the act and either the following applies-

(i) the person has retained that record at all relevant times; or

(ii) that record has been lost or destroyed because of the actions of another person over whom the first-mentioned person had no control, or because of a non-human act or event over which the first-mentioned person had no control, and the first-mentioned person could not reasonably be expected to have guarded against the bringing about of that loss or that destruction.

(2) For the purposes of this Act, an "act of a routine nature" does not include a decision to award new business or to continue business with a particular party, including a decision on the terms of that business, or encouraging another person to make any such decision.

(3) A report under this section shall set out-

(a) the value of the payment concerned;

(b) particulars of the act of a routine nature that was sought to be expedited or secured by the payment;

(c) the date or dates on which the payment was made and on which the act of a routine nature occurred;

(d) the identity of the relevant foreign public official; and

(e) the signature of the person who has made the report or some other means of verifying the person's identity.

False statements to the Commission

25. (1) Where a person makes or causes any other person to make to the Commission or to an investigating officer, in the course of the Commission or such investigating officer exercising any power conferred by this Act, any statement which to the knowledge of the person making the statement, or causing the statement to be made-

(a) is false or intended to mislead; or

(b) is not consistent with any other statement previously made by such person to any other person having authority or power under any law, or otherwise, to receive, or require to be made, such other statement regardless whether or not the person making the statement is under any legal or other obligation to tell the truth, he commits an offence and is liable on summary conviction to a fine of ten thousand dollars or to imprisonment for a term of three years or to both.

(2) Where a person, who has made a statement to the Commission or to an investigating officer, in the course of the Commission or such investigating officer exercising any power conferred by this Act, subsequently thereto makes any other statement to any person

having authority or power under any law, or otherwise, to receive, or require to be made, such other statement, regardless of whether or not the person making the statement is under a legal or other obligation to tell the truth that person, if such other statement-

(a) is inconsistent with any statement previously made to the Commission or to an investigating; and

(b) is made wilfully, he commits an offence and is liable on conviction to a fine of one thousand dollars or to imprisonment for a term of three months or to both.

(3) For the avoidance of doubt, it is declared that for the purposes of subsection (1)(b) and subsection (2), any statement made in the course of any legal proceedings before any court, whether civil or criminal, or any statement made by any person in the course of any disciplinary proceedings, whether such legal proceedings or disciplinary proceedings are against the person making the statement or against any other person, shall be deemed to be a statement made to a person having authority or power under law to receive the statement so made.

It is noted that some of these offences can only be committed by a public officer or a member of Parliament while others can be committed by any member of the public.

Appendix 3

The Jakarta Principles

- **MANDATE:** ACAs shall have clear mandates to tackle corruption through prevention, education, awareness raising, investigation and prosecution, either through one agency or multiple coordinated agencies;
- **COLLABORATION:** ACAs shall not operate in isolation. They shall foster good working relations with state agencies, civil society, the private sector and other stakeholders, including international cooperation;
- **PERMANENCE:** ACAs shall, in accordance with the basic legal principles of their countries, be established by proper and stable legal framework, such as the Constitution or a special law to ensure continuity of the ACA;
- **APPOINTMENT:** ACA heads shall be appointed through a process that ensures his or her apolitical stance, impartiality, neutrality, integrity and competence;
- **CONTINUITY:** In the event of suspension, dismissal, resignation, retirement or end of tenure, all powers of the ACA head shall be delegated by law to an appropriate official in the ACA within a reasonable period of time until the appointment of the new ACA head;
- **REMOVAL:** ACA heads shall have security of tenure and shall be removed only through a legally established procedure equivalent to the procedure for the removal of a key independent authority specially protected by law (such as the Chief Justice);
- **ETHICAL CONDUCT:** ACAs shall adopt codes of conduct requiring the highest standards of ethical conduct from their staff and a strong compliance regime;
- **IMMUNITY:** ACA heads and employees shall have immunity from civil and criminal proceedings for acts committed within the performance of their mandate. ACA heads and employees shall be protected from malicious civil and criminal proceedings;
- **REMUNERATION:** ACA employees shall be remunerated at a level that would allow for the employment of sufficient number of qualified staff;
- **AUTHORITY OVER HUMAN RESOURCES:** ACAs shall have the power to recruit and dismiss their own staff according to internal clear and transparent procedures;
- **ADEQUATE AND RELIABLE RESOURCES:** ACAs shall have sufficient financial resources to carry out their tasks, taking into account the country’s budgetary resources, population size and land area. ACAs shall be

entitled to timely, planned, reliable and adequate resources for the gradual capacity development and improvement of the ACA's operations and fulfillment of the ACA's mandate;

- **FINANCIAL AUTONOMY:** ACAs shall receive a budgetary allocation over which ACAs have full management and control without prejudice to the appropriate accounting standards and auditing requirements;
- **INTERNAL ACCOUNTABILITY:** ACAs shall develop and establish clear rules and standard operating procedures, including monitoring and disciplinary mechanisms, to minimize any misconduct and abuse of power by ACAs;
- **EXTERNAL ACCOUNTABILITY:** ACAs shall strictly adhere to the rule of law and be accountable to mechanisms established to prevent any abuse of power;
- **PUBLIC REPORTING:** ACAs shall formally report at least annually on their activities to the public;
- **PUBLIC COMMUNICATION AND ENGAGEMENT:** ACAs shall communicate and engage with the public regularly in order to ensure public confidence in its independence, fairness and effectiveness.

Executive Summary of the Anti-Corruption Commission's 2022-2023 Annual Report

Samuel Bulgin KC, JP
Honourable Attorney General

Franz Manderson MBE, Cert. Hon., JP
Honourable Deputy Governor

Statement from the Honourable Attorney General and Honourable Acting Deputy Governor

The Anti-Corruption Commission (the "Commission") was created under the Anti-Corruption Law, 2008 (now the Anti-Corruption Act (2019 Revision) (as amended)) (the "Act") which came into effect on 1 January 2010. The Commission is responsible for the administration of the Act and shall receive, consider and investigate reports to the Commission of corruption offences as set out in the Act, amongst other duties.

The Act gives effect to the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and to the United Nations Convention against Corruption and covers a broad range of local corruption offences by public officials, private individuals and entities. It extends to bribery of foreign public officials outside the Cayman Islands and offences under the Act are extraditable.

The Commission works diligently with other entities, both public and private, in order to fulfil its legislative mandate. The Cayman Islands Government as a whole continues to ensure the Act is properly enforced and will continue to support the Commission in its efforts.

This Executive Summary has been laid in the House of Parliament in accordance with s.53 of the Act.

Section One – The Commission

The Commission is responsible for the administration of the Act and shall:

- Receive and consider reports to the Commission of the alleged or suspected commission of a corruption offence as set out in the Act and investigate such reports where the Commission has reason to suspect the commission of an offence or an attempt to commit an offence or a conspiracy to commit and offence;
- receive (including from overseas anti-corruption agencies) and request, analyse and disseminate disclosures of information concerning corruption offences, or suspected offences; or required by any law in order to counter corruption; and
- detect and investigate suspected corruption offences, attempts to commit an offence, or conspiracies to commit an offence.

During the reporting period the Commission was comprised of Chairman Adrian (Gus) Pope, Members Simon Whicker, Laurence Aiolfi, Kendra Foster, Romeo Frederick, Charles Jennings, former Chairman Sophia-Ann Harris (term ended August 2022) and former Members Kadi Pentney (term ended August 2022) and Kenrick Hall (term ended December 2022). Her Excellency the Governor has broad powers of oversight over the work of the Commission and may give to the Commission directions as to the policy to be followed in the exercise and performance of its functions.

The Commission's mission is "To enhance the stability, prosperity and reputation of the Cayman Islands by sustaining the confidence and trust of the community in the integrity and good governance of its government and public institutions through fighting corruption with just, fair and effective investigations."

Section Two – Breaches of the Act

The Commission receives reports of alleged breaches under the Act through direct communication to the Commission; requests for mutual assistance from overseas; and those reported to other law enforcement agencies and referred to the Commission. In each case, the allegation is fully recorded and a decision taken as to what, if any, further investigation or action is appropriate.

Each allegation is assessed on its own merits. No prosecution is undertaken without the express authority of the Director of Public Prosecutions in accordance with the Act.

Section Three – Reporting Corruption

Anyone who reasonably believes or suspects that there has been an act of corruption in breach of the Act should complete and submit a Report/Complaint Form to the Commission. Reports/Complaints should be made as soon as reasonably practicable after becoming aware of the conduct in question.

Individuals should be aware of the principles that guide the performance of public officers in the conduct of their duties. Public officers may incur criminal liability for corruption as follows:

- **Those directly involved:** A person who is directly involved in committing a corruption offence may be liable for the offence.
- **Those indirectly involved:** A person may be liable for a corruption offence where s/he is indirectly involved in committing the offence.
- **Failure to act:** An individual may be liable for a corruption offence even where s/he was not directly involved in committing the offence, but was wilfully blind to it.
- **Aiding and abetting:** An individual may also be liable for aiding and abetting where he has aided or assisted in the committing of the offence.

Reports/Complaints should be submitted to the Commission via the Senior Investigating Officer of the Commission (the "SIO") to the following contact details:-

Phone: 1-345-244-3685
Website: www.anticorruptioncommission.ky
E-mail: info@anticorruptioncommission.ky; or richard.oliver@gov.ky;
Mailing Address: P.O. Box 391 KY1-1106
Physical Address: 4th Floor George Town Financial Center, #90 Fort Street, George Town, Grand Cayman, CAYMAN ISLANDS

Should any member of the Commission receive a report/complaint it will be forwarded to the SIO. Members of the public making reports/complaints are encouraged to use the Report/Complaint Form whenever possible. The SIO or any member of the Commission receiving a verbal report/complaint by telephone call or otherwise should also complete the Report/Complaint Form (or a functionally equivalent written document containing all material facts) for submission to the Commission.

Section Four – 2022-2023 Corruption Statistics

During the reporting period the Commission received 11 formal complaints/reports of corruption, accepted 2 complaints for investigation, and conducted 87 interviews. A total of 4 persons were arrested, 1 person charged and 2 persons convicted. The Commission submitted 56 reports to the Office of the Director of Public Prosecutions and 4 files were awaiting charge ruling.

At the end of the reporting period the Commission was actively investigating 11 cases.

Section Five – Topical Issues

During the current reporting period various amendments to the Act, as contained in the previously reported Anti-Corruption (Amendment) Bill, were duly enacted and the amendments to the Act came into effect in January 2023. The Commission will continue to consider proposing further amendments to the Act as and when considered necessary or desirable.

Regular training and development initiatives are explored and implemented to further enhance the work of the Commission.

The Commission retained external counsel to undertake an assessment of the structure and operations of the Commission against the international "best practices" set forth in the Jakarta Principles promulgated by the Conference of States Parties to the UN Convention against Corruption. The assessment is being digested by the Commission and it is considering appropriate next steps.

Although the post of a Public Relations and Education Coordinator to support all six Commissions served by the Commissions Secretariat was created in 2020, at least in the case of the ACC no substantive materials were produced during the period of this report and, indeed, the post was unstaffed during much of that period. Although the current Commission remains committed to the ideals of public education and awareness training, in the short term it must be assumed there is unlikely to be much change or improvement in this area.

The day-to-day administration of the affairs of the Commission has not been without challenges during the reporting period. Reasons include resource constraints and structural issues.

Section Six – Moving Forward

The Commission will continue to work diligently to process reports/complaints and carry through investigations to their conclusion; support the fulfilment of the CFATF recommendations; analyse, and work towards compliance with, the Jakarta Principles; seek to enhance the independence and support of the Commission; explore ways to deliver more public education about corruption with a view to its prevention; and seek to enhance its working relationships with other relevant commissions and government agencies.

The full 2022-2023 Annual Report of Anti-Corruption Commission is attached to this Executive Summary.

Dated this day of 2024.

Samuel Bulgin, KC, JP
Honourable Attorney General

Franz Manderson, OBE, Cert. Hon, JP
Honourable Deputy Governor