



Report of Investigation

Concerning Allegations of Conflict of Interest and Irregularities in the Approval Process Related to the Rental/Lease of a Section of the Ocho Rios Transportation Centre and the Construction of a Commercial Building

**INTEGRITY COMMISSION
JULY 2026**



This Publication until tabled in Parliament shall be confidential.

Sections 55 (4) and (5) of the Integrity Commission Act state:

"(4) Anything said or information supplied or any document or thing produced by any person for the purpose or in the course of any investigation by or proceedings before the Commission under this Act, shall be absolutely privileged in the same manner as if the investigation or proceedings were proceedings in a court of law.

(5) For the purposes of the Defamation Act, any report made by the Commission under this Act and any fair and accurate comment thereon shall be deemed to be privileged."

Section 56 of the Integrity Commission Act states:

"Subject to section 42(3)(b), every person having an official duty under this Act, or being employed or otherwise concerned in the administration of this Act (hereinafter called a concerned person) shall regard and deal with as secret and confidential, all information, statutory declarations, government contracts, prescribed licences and all other matters relating to any matter before the Commission, except that no disclosure made by the Commission or other concerned person in the proceedings for an offence under this Act or under the Perjury Act, by virtue of section 17(2) of that Act, shall be deemed inconsistent with any duty imposed by this subsection.

(2) The obligation as to secrecy and confidentiality imposed by this section, in relation to any documents, or information obtained under this Act continues to apply to a person despite the person having ceased to have an official duty, be employed or otherwise concerned in the administration of this Act.

(3) Every concerned person who is required under subsection (1) to deal with matters specified therein as secret and confidential who at any time communicates or attempts to communicate any such information, declaration, letter and other document or thing referred to in subsection (1) disclosed to him in the execution of any of the provisions of this Act to any person —

(a) other than a person to whom he is authorized under this Act to communicate it; or

(b) otherwise than for the purpose of this Act,

commits an offence and shall be liable on summary conviction in a Parish Court to a fine not exceeding one million dollars or to a term of imprisonment not exceeding one year.

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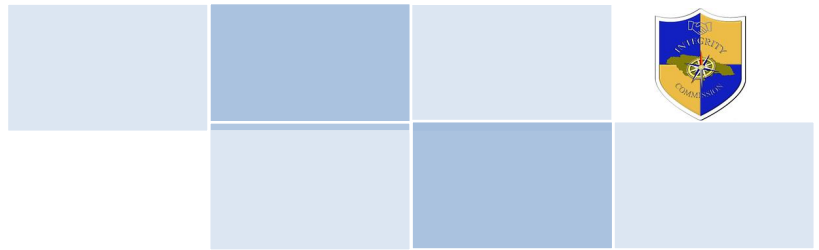
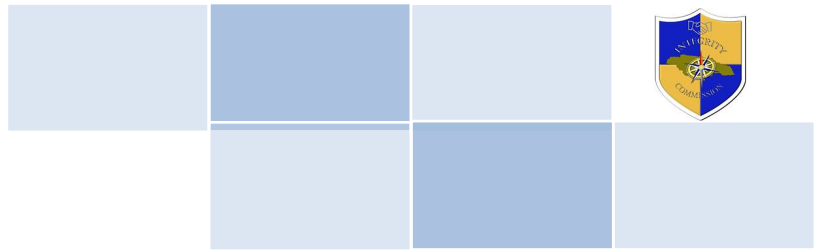


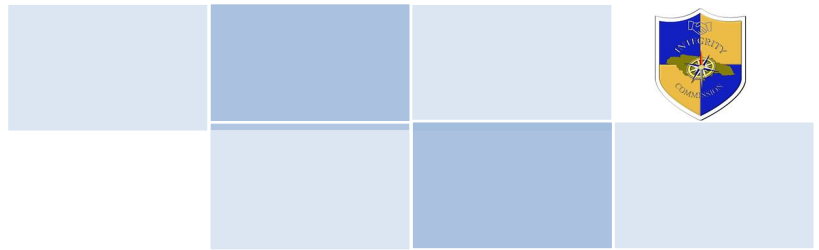
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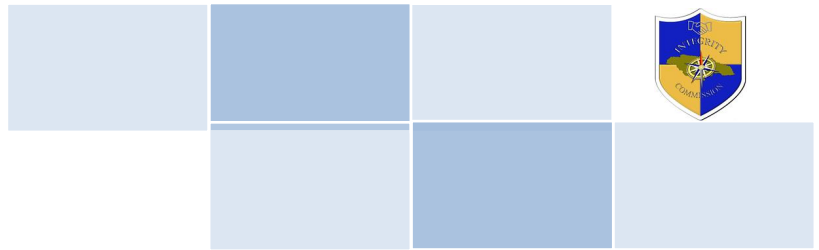


Chapter 1 – Executive Summary

- 1.1 This Investigation Report concerns allegations of conflict of interest and irregularities in the approval processes governing the rental/lease of government property and the construction of a commercial building at the Ocho Rios Transportation Centre, St. Ann.
- 1.2 The investigation confirms that Mrs. Shirlyn Campbell-Bell, wife of Mr. Ian Bell, Councillor for the Beecher Town Division of the St. Ann Municipal Corporation (SAMC), constructed and has since operated a commercial building at the Ocho Rios Transportation Centre without the necessary building and planning permits, in breach of section 17(1)(a) of the Building Act, 2018. The investigation further found that the application for the underlying space was not submitted through the SAMC's Registry Department in accordance with the established process, and that Mrs. Campbell-Bell's married name was omitted from the application.
- 1.3 The investigation also confirms that Councillor Ian Bell, a member of the Commercial Services Committee that considered his wife's application, attended the Committee's deliberations on the matter without withdrawing or recusing himself, notwithstanding his direct personal interest in the outcome. The DI finds that this conduct breached the standards of conflict-of-interest management expected of elected officials under the Ministry of Local Government and Community Development's Councillor's Handbook.



- 1.4 The investigation additionally identified procedural failures on the part of the SAMC, including the issuance of correspondence that conveyed final approval to the applicant before the requisite process had been completed, the absence of any referral to the Ministry of Local Government and Community Development for the Minister's approval of the underlying lease, and a sustained failure to collect the applicable user fees from the business since its establishment in 2023.
- 1.5 Recommendations are made herein to the St. Ann Municipal Corporation, the Ministry of Local Government and Community Development, and the Office of the Prime Minister and the Ministry of Justice and Constitutional Affairs, to address the breaches identified and to prevent their reoccurrence.



Chapter 2 – Background

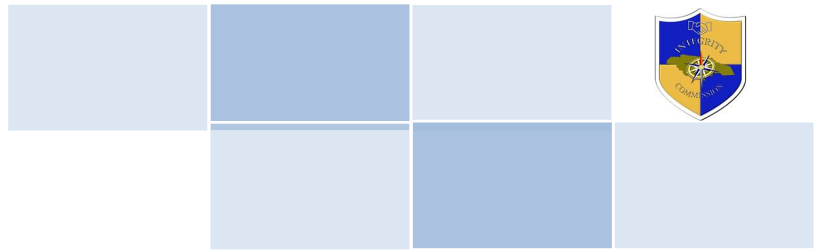
2.0 This chapter sets out the background information concerning the investigation, jurisdiction and allegations.

Initiation of Investigation

2.1 On August 29, 2023, the Director of Investigation (hereinafter referred to as the DI) commenced an investigation into allegations of impropriety, irregularity, and conflict of interest in the approval processes regarding the rental and/ or lease of government property and the construction of a building in the Ocho Rios Transportation Centre, St Ann. The instant matter was referred to the DI by the Director of Information and Complaints on July 24, 2023.

Jurisdiction

2.2 The Investigation was conducted pursuant to **section 33** of the ***Integrity Commission Act***, which empowers the DI to investigate matters referred by the Director of Information and Complaints, which fall within the remit of the ***Integrity Commission Act***.



Allegations

2.3 By way of a letter dated June 15, 2023, received from an anonymous complainant, the following allegations were made:

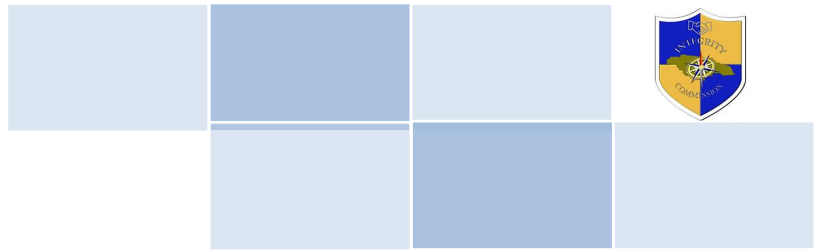
- a) *"...Mr. Ian Bell, Councillor for the Beecher Town Division of the St Ann Municipal Corporation, used his wife's name, Shirlyn Campbell, to apply [for permission to build] and build a structure to do business in the Ocho Rios Bus Park of the Municipal Corporation;*
- b) *"... no building plans were submitted to the council but the building was built; and*
- c) *"... Mr Bell used his wife's name to apply for a space in the bus park, without declaring his marital connection with Ms. Campbell.*

Individuals Pertinent to the Investigation

2.4 The following persons were considered pertinent to the investigation:

St. Ann Municipal Corporation

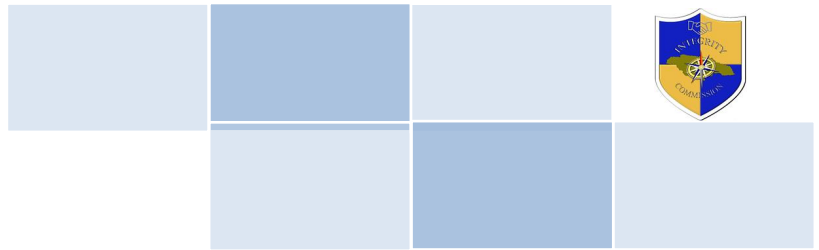
- 1. Mrs. Jennifer Brown-Cunningham, Chief Executive Officer;
- 2. Mr. Glenford Ricketts, Chief Engineering Officer (Acting);
- 3. Mr. Nickel Simms, Field Assistant, Roads and Works Department;
- 4. Mrs. Claudine Fearon-Thomas, Director of Planning;
- 5. Mr. Trevon Clayton, Chief Financial Officer;
- 6. Ms. Kady-Ann Clarke, Accountant/ Budget and Revenue Officer;
- 7. Ms. Ann-Marie Williams, Commercial Services Supervisor;



8. Ms. Lasonya Williams, Records Clerk and Secretary of the Commercial Services Committee;
9. Mrs. Polyanna Myers, Supervisor (Acting), Ocho Rios Transportation Centre;
10. Ms. Patricia Christie, Records Clerk;
11. Ms. Leicha Weir, Office Manager, Registry Department;
12. Mr. Cardell Wickham, Councillor, Gibraltar Division;
13. Mr. Paul McFarlane, Councillor, Calderwood Division;
14. His Worship the Mayor, Michael Belnavis, Councillor, Ocho Rios Division;
15. Mr. Ian Bell, Councillor, Beecher Town Division;
16. Mr. Dalas Dickenson, Councillor, St. Ann's Bay Division;
17. Mrs. Genevor Gordon-Bailey, Councillor, Lime Hall Division;
18. Mrs. Lydia Richards, Former Councillor, Bensonton Division;
19. Mr. Winston Brown, Former Councillor, Borobridge Division;
20. Mr. Rohan Davidson, Councillor, Alexandria Division;
21. Mrs. Kim Brown Lawrence, Councillor, Browns Town Division;
22. Mr. Carlton Ricketts, Councillor, Dry Harbour Division;
23. Mr. Sydney Stewart, Councillor, Bamboo Division;
24. Mr. Ian Isaacs, Councillor; and
25. Mr. Delroy Kelly, Councillor.

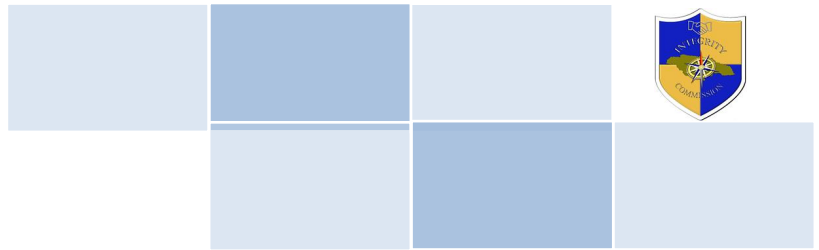
Businesswoman and Applicant/'Lessee'

26. Mrs. Shirlyn Campbell-Bell

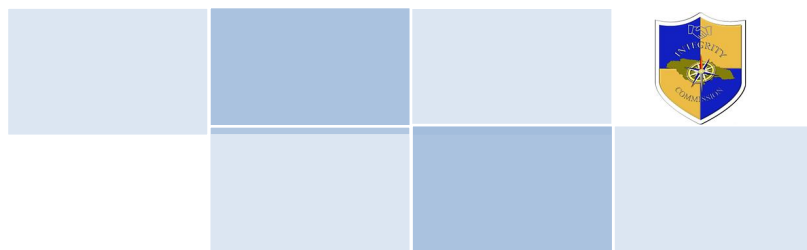


Chapter 3 – Terms of Reference

- 3.0 This chapter outlines the scope of the investigation and the issues that were explored.
- 3.1 The objectives of the investigation were to establish, *inter alia*, the following:
- 3.1.1 Whether an application was submitted by Mr. Ian Bell and/or Ms. Shirlyn Campbell to the St. Ann Municipal Corporation (SAMC) for permission to build a structure in the Ocho Rios Transportation Centre;
 - 3.1.2 Whether a building permit was issued to Ms. Shirlyn Campbell to erect and/or construct a building in the Ocho Rios Transportation Centre;
 - 3.1.3 Whether a structure exists in the Ocho Rios Transportation Centre, which is owned and/or operated by Ms. Shirlyn Campbell and/or Mr. Ian Bell;
 - 3.1.4 Whether there is a rent/lease agreement between Ms. Shirlyn Campbell and/ or Mr. Ian Bell and the SAMC and/or the Ministry of Local Government and Community Development for a space in the Ocho Rios Transportation Centre;



- 3.1.5 Whether Ms. Shirlyn Campbell is the same as Mrs. Shirlyn Campbell-Bell, the wife of Mr. Ian Bell, Councillor for the Beecher Town Division of the SAMC;
- 3.1.6 Whether the circumstances which led to the approval of the rent/lease agreement and the Building and Planning permit for the construction of a building in the Ocho Rios Transportation Centre, constitute a conflict of interest and/or irregularity;
- 3.1.7 Whether there were breaches of the ***Building Act, Integrity Commission Act***, and/or any other relevant legislation regarding approvals or permits for the construction/erection of a structure at the Ocho Rios Transportation Centre; and
- 3.1.8 Whether recommendations ought to be made in respect of the investigation.



Chapter 4 – The Investigation

4.0 This chapter outlines the investigative actions that were undertaken throughout the investigation.

4.1 The following actions were executed during the course of the investigation:

- a) During the period September 10, 2023 to April 9, 2024, five (5) Notices were served on individuals who were deemed to be pertinent to the investigation to provide written statements;
- b) During the period January 9, 2024 to June 18, 2025, thirty-three (33) witness statements were recorded and/or obtained;
- c) One (1) Judicial Hearing was conducted on October 22, 2024;
- d) Two (2) unannounced site visits to the Ocho Rios Transportation Centre were conducted on October 31, 2023 and June 12, 2024;
- e) A review of the **Integrity Commission Act, Building Act**, the **Policy Framework and Procedural Manual for the Divestment of Government-Owned Land 2015** and other relevant legislation and policies was undertaken; and
- f) An analysis of the witness statements, supporting documents, and records provided by the respondents was conducted to inform the DI's conclusions and recommendations.



Chapter 5 – Law, Policy, Evidence and Discussion of the Findings

5.0 This chapter sets out the applicable law, policies, evidence, findings and discussion in respect of the investigation.

Application made by Ms. Shirlyn Campbell to the SAMC concerning the Ocho Rios Transportation Centre.

Table 1

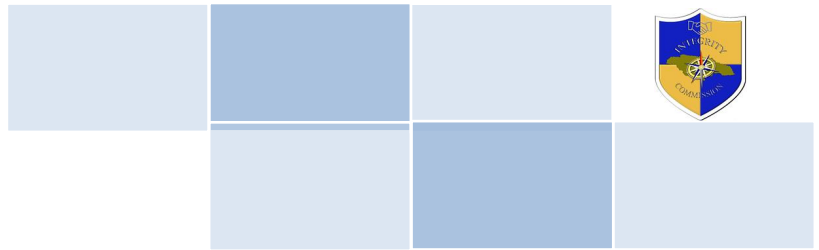
Chronology of Events	
March 31, 2023	Application letter sent by Ms. Shirlyn Campbell to the St. Ann Municipal Corporation (SAMC) to “apply for a section of the Ocho Rios Transportation Centre to house a container. My intention is to operate a gaming lounge.”
April 3, 2023	Memo from Commercial Services Committee (CSC) to Glenford Ricketts Chief Engineering Officer (Stamped April 4, 2023) directing that an investigation be conducted to verify if suitable space existed to house a container.
April 28, 2023	Memo to Glenford Ricketts from Nickel Simms (Field Assistant of the Roads and Works Department) recommending approval for Mrs. Shirlyn Campbell container after his visit to the transport centre on April 28, 2023.
May 1, 2023	Commercial Services Committee Meeting Minutes under the heading “Supplemental” indicated the following: “Memo Re: Investigation done by road and works forwarded from previous meeting. • Application to Erect a container Ocho Rios Transportation Centre-Approved”



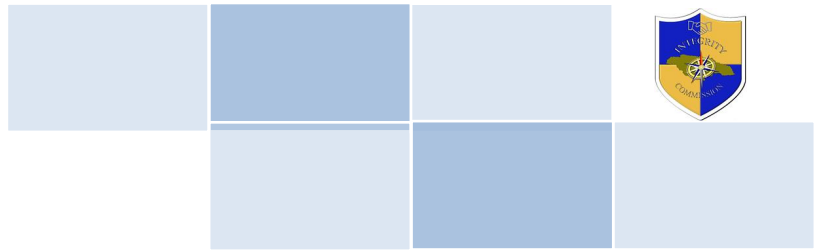
May 1, 2023	Letter directed to Ms. Campbell advising her that her request was approved based on discussions at the CSC meeting held on May 1, 2023.
May 10, 2023	Letter sent to Ms. Campbell from Kady-Ann Clarke (Actg. Account-Budget and Revenue at SAMC) informing her of the requirement that should be met and the specific documentation to be submitted to the Planning Department at SAMC (Building application Checklist).
June 5, 2023	Commercial Services Committee Meeting Minutes under the heading "Supplemental" indicated the following: "Costing of container/truck body for.... Shirlyn Campbell - forwarded to finance"
June 6, 2023	Letter directed to the Chairman and Members of the Finance Committee from the Commercial Services Committee with <i>subject</i> : "Approval for Container Costing", advising that "at the last sitting of the Commercial Services Committee, the committee decided to direct the captioned for approval to be sought for Shirlyn Campbell... to pay Thirty Thousand Dollars (30,000.00) for monthly fee."
July 24, 2023	Submission of application of Building &/or Planning permission by Shirlyn Campbell- Bell
July 27, 2023	SAMC received the signed application on July 27, 2023 and payment made of 33,950 JMD to the SAMC (Building Fees-Commercial) by Shirlyn Campbell-Bell
August 8, 2023	Site visit conducted by the Ministry of Local Government and Community Development, to determine the suitability of the stipulated area to house a gaming lounge.
August 22, 2023	Ministry of Local Government and Community Development prepared an internal audit report RE: Lease of Transportation Centre in St. Ann.



October 2, 2023	Commercial Services Committee Meeting Minutes under the heading "Supplemental" indicated the following: • "Application for container space Ocho Rios Transportation Centre Shirlyn Campbell- a memorandum received from the finance committee dated September 6, 2023 stating that the CENGO [Chief Engineering Officer] should do an assessment of the overall property occupied by Mrs. Shirlyn Campbell and forwarded to the Planning Department for records keeping. • Committee agreed"
November 16, 2023	Letter to Glenford Ricketts (Chief Engineering Officer, Roads and Works, SAMC) from M Brown (for CEO of SAMC) requesting an examination of plan for a proposed addition to existing ware-house and whether they conform to requirements.
December 8, 2023	Letter directed to CEO Jennifer Brown-Cunningham from PS Marsha Henry-Martin captioned Re: Lease of Transportation Centre in St. Ann , outlining that due process was neglected and that the CEO may consider disciplinary action of the officers involved, reminding the CEO of the requirements to be observed where properties are to be leased by the Local Authorities as well as an obligation in law to uphold the requirements for building approvals.
February 1, 2024	Site inspection report by Conway Cameron of the Roads and Works Department, stating that the application had conformed to the standards of the SAPC and recommended for approval.
February 12, 2024	Correspondence directed to the Chief executive Officer from the Chief Engineering Officer recommending conditional approval for the proposed commercial building (Gaming Lounge) to be erected Ocho Rios Transportation Centre St. Ann.



- 5.1 As indicated in the table above, by way of a letter dated March 31, 2023, Ms. Shirlyn Campbell made an application to the SAMC to rent a section of the Ocho Rios Transportation Centre to house a container from which to operate a gaming lounge.
- 5.2 A letter dated April 3, 2023, addressed to the Chief Engineering Officer from the Commercial Services Committee, directed that *“an investigation be conducted to verify if space existed suitable to house a container.”* The DI notes that the letter directed to the Chief Engineering Officer from the Commercial Services Committee on the aforementioned date is indicative of the application being mentioned in the Commercial Services Committee meeting of the same date. The Minutes of the referenced meeting however, does not capture the referenced application.
- 5.3 On April 28, 2023, Mr. Nickel Simms, Field Assistant of the Roads and Works Department, directed a memo to Mr. Glenford Ricketts, recommending approval for Mrs. Shirlyn Campbell container after his visit to the Transportation Center on April 28, 2023.
- 5.4 In response to Ms. Campbell’s application, the SAMC, in a letter dated May 1, 2023, captioned *“Application to place a 40ft Container in the Ocho Rios Transportation Centre”*, informed Ms. Shirlyn Campbell that her request was approved.
- 5.5 In a subsequent letter dated May 10, 2023, the SAMC notified Ms. Campbell of the requirements for mounting the container mentioned in her application. The letter included a Building Application Checklist, which



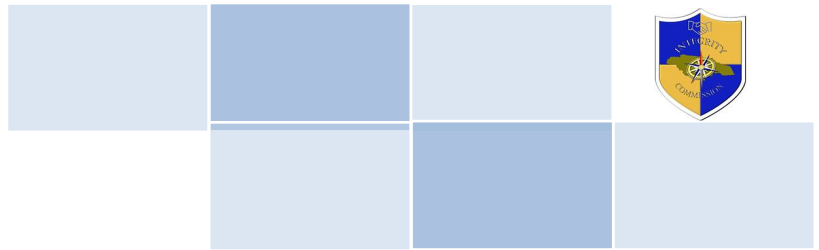
outlined the requirements. These included, *inter alia*, proof of ownership, detailed plans, a location map, site plans, and construction drawings for both the floor and roof plans.

- 5.6 By way of a statement dated April 16, 2024, Ms. Shirlyn Campbell confirmed receipt of the letters sent to her by the SAMC. She stated, *inter alia*, that “...The same day I received approval from the Municipal Corporation I went to the hardware to purchase building materials including cement and gravel to build a platform to mount the container on. To the best of my knowledge, the container was mounted about the 3rd or 4th of May 2023.”¹

Legislation Governing the Issuance of Building and Planning Permits

- 5.7 Having regard to the referenced allegations and the application made by Ms. Shirlyn Campbell, the DI undertook a review of the legislative framework which governs the permits required for the construction of a building.
- 5.8 The memorandum of objects and purpose of the ***Building Act***, which came into effect on January 15, 2019, reads, **“AN ACT to Repeal the Kingston and St. Andrew Building Act and the Parish Councils Building Act and make new provisions for the regulation of the building industry; to facilitate the adoption and efficient application of national building standards to be called the National Building Code of Jamaica for ensuring safety in the built**

¹ Witness statement of Mrs. Shirlyn Campbell Bell, Businesswoman, dated April 16, 2024, p1



environment, enhancing amenities and promoting sustainable development; and for connected matters.”²

5.9 Section 17 of the **Building Act** provides as follows:

“(1) A person shall not carry out building work unless –

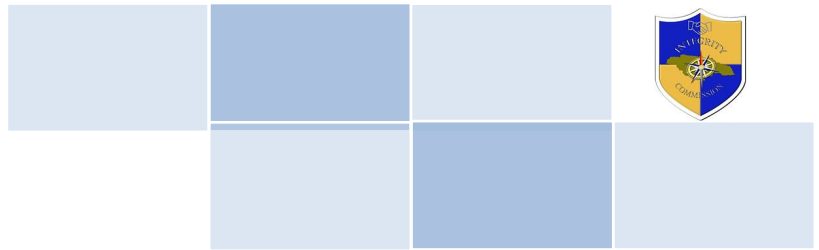
- (a) a building permit in respect of the building work has been issued to him;
- (b) where applicable, a planning permit has been issued to him under the Town and Country Planning Act; and
- (c) the building work is carried out in accordance with the building permit, this Act, the National Building Code or of any other regulations made under this Act.

(2) A person who contravenes subsection (1) commits an offence and shall be liable on conviction to the penalty specified in relation to that offence in the First Schedule.

(3) In addition to any penalty that is imposed under section (1), the court may, under subsection (2), issue any order that the Local Authority could make for the remedy of the breach giving rise to the conviction, including an order for the taking down or alteration of a building or part of a building, so as to conform with the requirements of the building permit, this Act, the National Building Code and any other regulations made under this Act.”³

² The Building Act, 2018

³ The Building Act, 2018, Section 17

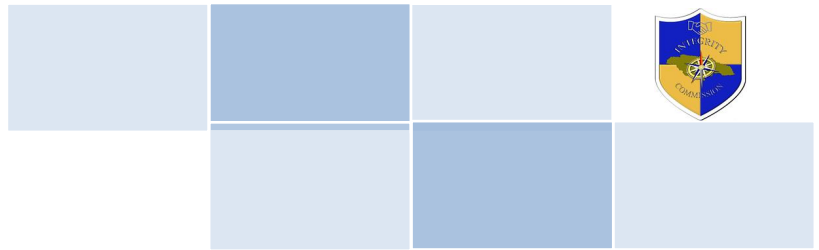


5.10 In accordance with the legal provisions governing building construction, a Building and/or Planning Permit is required for any construction or erection of a building in the Ocho Rios Transportation Centre.

The Application Requirements for Building and Planning Permission at the SAMC

5.11 By way of a statement dated November 26, 2024, Mrs. Claudine Fearon-Thomas, Director of Planning, SAMC, outlined the process to be followed upon receipt of an application for planning permission. The process is summarised below:

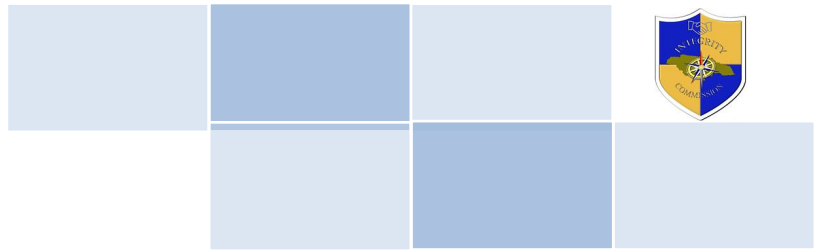
- I. When applying for a building permit, the following documents are required: (i) Proof of Ownership, such as the Title of the Property, a Lease Agreement or any other document to prove that the applicant has the right to make the application; (ii) Surveyor's ID Report; (iii) Current Property Tax Certificate. However, in the event the application is not submitted by the owner(s), a duly authorised letter is required. Additionally, approvals from referral agencies, such as the Road and Works Department, the Ministry of Health, and the Fire Department, are required.
- II. Once the requisite documents are obtained, an assessment is conducted by the Roads and Works Department and the fees are calculated;
- III. The applicant visits the Planning Department with the plan and supporting documents;



- IV. The documents are reviewed against a checklist for completeness before submission;
- V. The applicant pays the fees and submits the plans to the Planning Department;
- VI. The plan is registered, a reference number is assigned and recorded in the Planning Department's Planning Register, and the various referral agencies are engaged for their comments;
- VII. On receipt of favourable comments from the respective agencies, the application is reviewed by the Director of Planning;
- VIII. Following this review, the application is presented before the Physical Planning Committee for approval;
- IX. After approval is granted, the approved conditions are prepared;
- X. The plans are subsequently prepared, meaning they are stamped approved and signed, and a permit card is also prepared and signed by the Director of Planning.⁴

5.12 Having regard to the legislative framework and the process outlined by the SAMC, the DI notes that although the SAMC gave approval to place a 40-ft container in the Ocho Rios Transportation Centre, Ms. Shirlyn Campbell had not applied for a Building and/or Planning permit, despite having completed the construction.

⁴ Witness statement of Mrs. Claudine Fearon-Thomas, Director of Planning, St Ann Municipal Corporation dated November 26, 2024, p1



Legislative and Policy Framework Governing the Lease of Government-Owned Land

5.13 Having regard to the foregoing, the DI reviewed the legislative and policy framework which governs the lease of government-owned lands, for which the Municipal Corporation is the custodian.

5.14 **Section 47** of the **Local Governance Act** provides as follows:

“(1) All lands vested-

(a) in the Commissioner of Lands for the benefit of the inhabitants of a Municipal Corporation; or

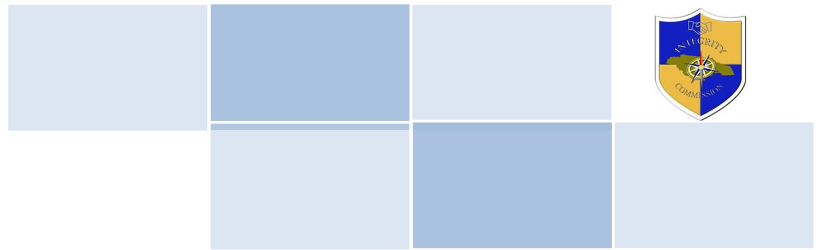
(b) in a Corporation, may, with the sanction of the Minister, be sold or leased by the Municipal Corporation upon such terms and conditions and subject to such covenants, obligations and agreements as the Minister may in each case determine.”⁵

5.15 **Section 49 (1)** of the referenced legislation states:

“Any lands vested in a Municipal Corporation under this Act that are not needed or used by the Municipal Corporation for the purposes of this Act may, with the approval of the Minister, be sold by the Municipal Corporation, or leased by its Council, upon such terms and conditions and subject to such covenants, obligations and agreements as the Minister may in each case determine.”⁶

⁵ Section 47(1)(a)(b) of the Local Governance Act, 2016

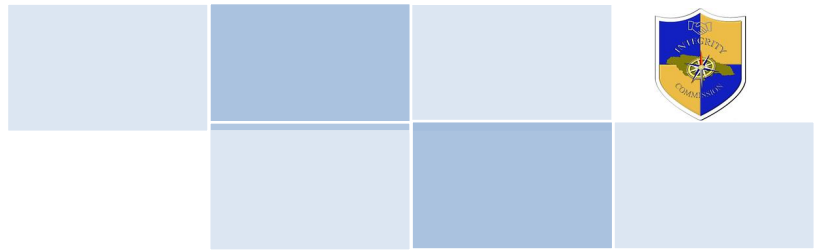
⁶ Section 49 (1) of the Local Governance Act, 2016



- 5.16 Based on the legislative provisions outlined above, the Municipal Corporation may, with the approval of the Minister responsible for Local Government and Community Development (MLGCD), lease and/or sell lands for which they are the custodians. However, the DI has seen no evidence that a lease agreement was entered into between Ms. Shirlyn Campbell and the SAMC concerning the Ocho Rios Transportation Centre.
- 5.17 Having regard to the application made by Shirlyn Campbell for the rental of a section within the Ocho Rios Transportation Centre to place a 40ft container, the DI wishes to highlight that before the approval of a building permit, an applicant is required to seek approval for a space in the Ocho Rios Transportation Centre, a self-financing entity.

Operations of Self-financing entities (commercial entities) owned and/or managed by the SAMC

- 5.18 By way of a statement dated July 17, 2024, Mr. Trevon Clayton, Chief Financial Officer, SAMC, explained that “...*Self-financing entities within the St Ann Municipal Corporation are categorised as those entities with the intent to be self-sufficient. The revenues generated by their activities are expected to cover operational expenses ...In self-financing entities such as markets and transportation centres, the Municipal Corporation opt for the rental of shops and spaces rather than leases. In these self-financing*



entities, there are instances where the corporation will have shops or open spaces for rental.”⁷

5.19 By way of a statement dated January 25, 2024, Ms. Ann-Marie Williams, Commercial Services Supervisor at the SAMC, advised that “...The Corporation has a sketch of the standard size of the shops that can be built. If it is bigger than the standard size, the applicant will have to submit all relevant documents to the planning department. In instances where the applicants want to install a container on the property, they will still have to submit the relevant documentation to the planning department and pay the relevant building fees and await approval. Approval has to be granted by the Municipal Corporation before the installation of any structure can commence. If the application is approved, the applicants are advised in writing”⁸

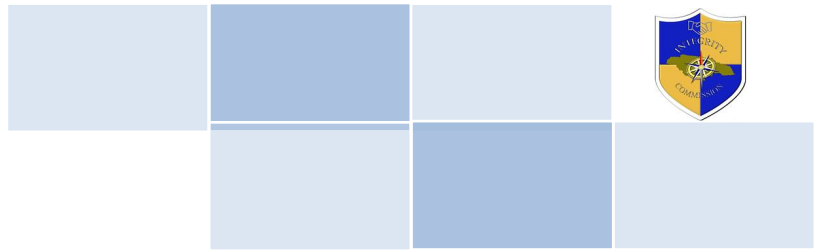
5.20 Mr. Nickel Simms, Field Assistant in the Road and Works Department of the SAMC, in a statement dated March 13, 2024, indicated that individuals are permitted shop spaces of the standard size, 10ft x 10ft (100 sq. ft).⁹ Based on a review of evidentiary material, Ms. Shirlyn Campbell’s container/shop is approximately 648 sq. ft¹⁰, more than six times the size of a standard shop space permitted by the SAMC.

⁷ Witness statement of Mr. Trevon Clayton, Chief Financial Officer, St Ann Municipal Corporation, dated July 17, 2024

⁸ Witness statement of Ms Ann-Marie Williams, Commercial Services Manager, St Ann Municipal Corporation, dated January 25, 2024

⁹ Witness statement of Mr. Nickel Simms, Field Assistant, Road and Works Department, SAMC, dated March 13, 2024

¹⁰Site Plan of Proposed Gaming Lounge Building Plan part of the Ocho Rios Transportation Centre , St Ann Jamaica, submitted to the SAMC Planning Department on July 27, 2023

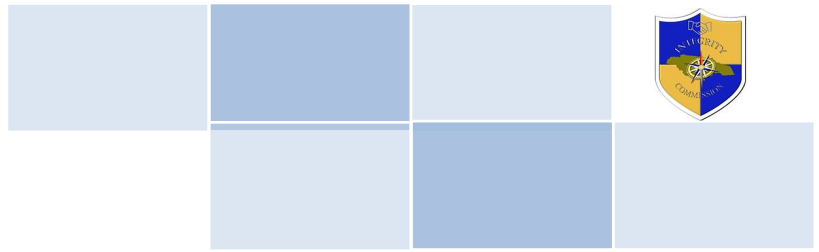


- 5.21 Mr. Clayton further advised that there is a documented process for the collection of user fees in self-financing entities within the SAMC, which is guided by a Standard Operating Procedure developed by the Commercial Services Unit. He also provided an overview of the process utilised by the Corporation in instances where user fees are not paid.
- 5.22 Mr. Clayton also stated, *inter alia*, that “...An approved occupier is an individual that would have gotten approval from the corporation for a space or a shop and who would have been advised of the rates, whether weekly or monthly.”¹¹ He asserts that “...when an approved occupier of a space within the self-finance entities is non-compliant as it relates to the payment of fees, first step, they are given a verbal warning and are advised to make payment, secondly, if it is prolong they are given a written notice. If payments are still not made, the Corporation may close the shop based on the guidance outlined in the agreement signed upon approval of the space by the Municipal Corporation. This is done in an effort to collect outstanding payments.”¹²
- 5.23 According to the SAMC’s System Documentation Commercial Services Operations Market and Transportation Centre document, which details the user fee structure for markets and transportation centres managed by the Corporation, the fees range between \$1000 - \$2600 weekly and \$14,460.00 - \$32,250.00 monthly.¹³

¹¹Witness statement of Mr. Trevon Clayton, Chief Financial Officer, St Ann Municipal Corporation, dated July 17, 2024

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¹³ Standard Operating Procedures titled “System Documentation Commercial Services Operations Markets and Transportation Centre”

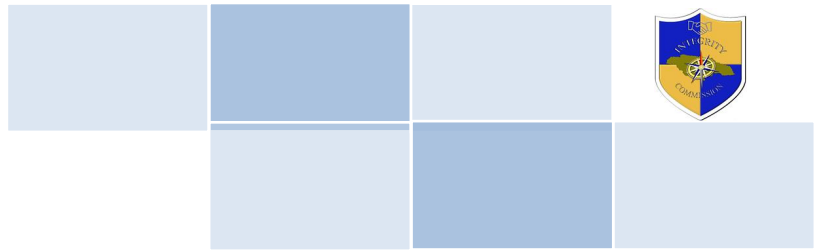


The application process for renting shops and/or open spaces within self-financing and/ or commercial entities managed by the SAMC.

5.24 Having regard to the application made to the SAMC by Ms. Shirlyn Campbell, the DI sought to examine the application process for renting shops and/or open spaces within self-financing and /or commercial entities managed by the SAMC, the involvement of all parties at each stage and whether this process was complied with.

5.25 Based on an analysis of the accounts of various officers of the SAMC, the application process for the rental of shops and/or open spaces within commercial entities managed by the SAMC is as follows:

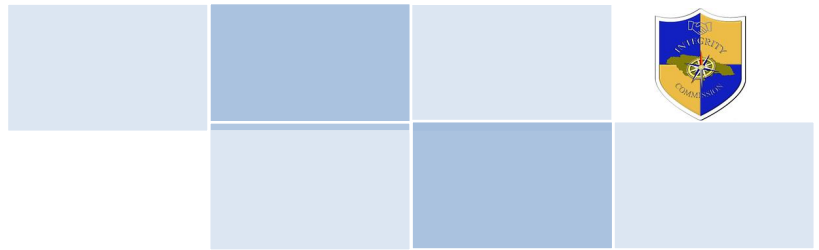
- i. The applicant submits a written application, addressed directly to the CEO, through the Registry Department.
- ii. The Registry Department date-stamps the application and records it in the CEO's dispatch Book.
- iii. The CEO's secretary reviews the documents to ensure accuracy and cross-references submissions with what has been received. The secretary signs the document and brings it to the attention of the CEO.
- iv. The CEO reviews the application, adds recommendations and refers it to the Commercial Services Committee through the Registry Department.
- v. The Registry Department reviews the recommended action(s) indicated by the CEO, records the date of receipt from the CEO, and makes a copy of the correspondence.



- vi. The original correspondence is dispatched to the Commercial Services Department, and a copy is retained on file in the Registry Department.
- vii. The Commercial Services Department compiles a list of applications to be presented at the monthly Commercial Services Committee meeting for approval.
- viii. At the meeting, the clerk presents the application to the committee for a decision.
- ix. If the application is recommended, it is referred to the Roads and Works Department via the registry for investigation to determine whether the request can be facilitated.
- x. The Roads and Works Department conducts a site visit and generates a report of the findings, which is presented with the initial application at the next sitting of the Commercial Services Committee.
- xi. If the Committee approves the application, the application and the decision of the Commercial Services Committee are then forwarded to the Finance Committee for final approval (ratification).
- xii. The applicant is notified in writing by a letter signed by the CEO.

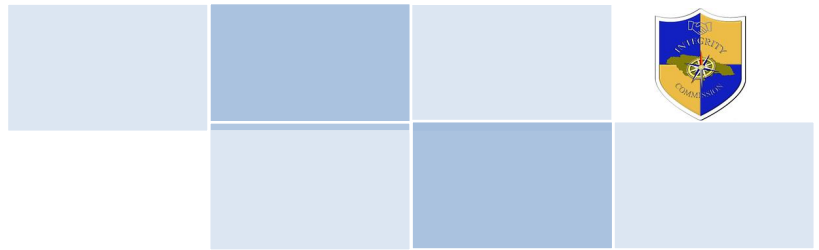
5.26 By way of a statement dated August 27, 2024, Ms. Leicha Weir, Office Manager, Registry Department at the SAMC, advised that, "... *The registry is responsible for receiving, recording and dispatching correspondences internally and externally at the Corporation... internal correspondences received at the registry also include the decisions made by committees within the Corporation.*"¹⁴

¹⁴ Witness statement of Ms. Leicha Weir, Office Manager, Registry Department at the St. AMC, dated August 7, 2024.



- 5.27 Ms. Weir also noted that in some cases, applications are submitted to the Commercial Services Department. However, she explained that when this happens, the document is logged in that department's correspondence book and sent to the registry. The correspondence is date-stamped before being dispatched to the CEO.
- 5.28 By way of a statement dated September 10, 2024, Ms. Patricia Christie, Records Clerk at the Registry Department at the SAMC, gave a similar account. She asserts that *"...all correspondences coming to and going out of the Municipal Corporation passes through the registry first, or is supposed to pass through the registry, before being dispatched to the Chief Executive Officer (CEO)... In instances where documents are submitted elsewhere in the Corporation and not directly to the Registry, the Registry Department is notified immediately and asked to retrieve the document and record it in the relevant correspondence books."*¹⁵
- 5.29 As it relates to the correspondence concerning an application made for a space in the Ocho Rios Transportation Centre to erect a 40ft container, Ms. Christie advised that, *"...I only recall seeing that document when it came back from a committee meeting. I don't recall the exact date but I do recall it was sometime in 2023...I know it did not come through the registry because all documents received at the registry is date stamped on receipt."*

¹⁵Witness statement of Ms. Patricia Christie, Records Clerk at the Registry Department at the St. AMC, dated September 10, 2024.



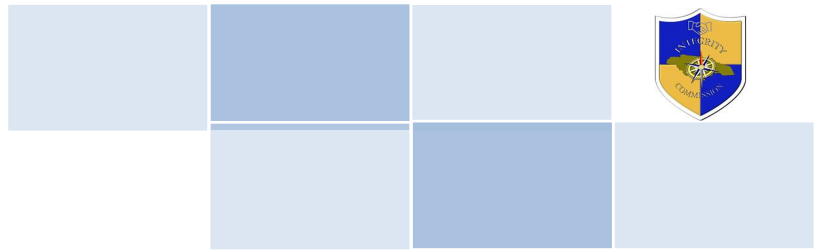
This particular application did not have a date stamp from the Registry Department which is proof that it did not come through the registry.”¹⁶

- 5.30 Based on the process outlined, a review of the registry records, and the account given by staff members in the Registry Department, the DI has seen no evidence that Ms. Campbell's application to the Corporation was submitted in accordance with the process outlined.

The Approval Process utilised by the SAMC for the rental of shops and/or open spaces within commercial or self-financing entities

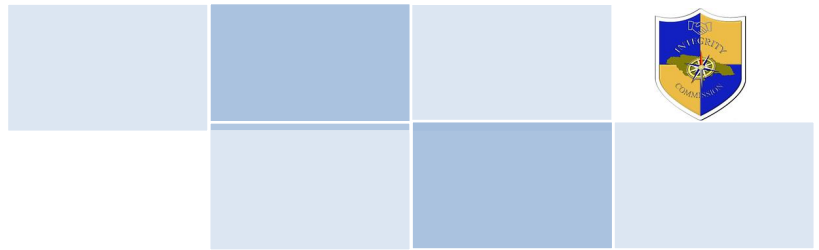
- 5.31 Having regard to the allegation that “...Mr. Ian Bell used his wife's name to apply for a space in the bus park, without declaring his marital connection with Ms. Campbell”, the DI sought to ascertain the process utilised by the SAMC in approving the rental of shops and/or open spaces within commercial or self-financing entities.
- 5.32 By way of a statement dated January 23, 2024, Mrs Jennifer Brown-Cunningham, Chief Executive Officer (CEO) at the SAMC, outlined the process utilised by the Corporation for the approval of applications for the rental of commercial spaces for which the SAMC is responsible. The process is summarised as follows:

¹⁶ Witness statement of Ms. Patricia Christie, Records Clerk at the Registry Department at the St. AMC, dated September 10, 2024.



- i. The applicant writes to the Municipal Corporation requesting permission to do business;
- ii. The request is taken to the Corporation's Commercial Services Committee. If recommended, the request is sent to the Roads and Works Department for investigation;
- iii. A subsequent report with guidelines and recommendations is re-tabled at the Corporation's Commercial Services Committee;
- iv. A financial report recommending the fees to be charged is then forwarded to the Finance Committee for Approval;
- v. The applicant is then advised in writing;
- vi. The applicant is invited to an interview;
- vii. The Technical Department is asked to assess for suitability of the location and if a permanent structure is to be built, a building plan is required;
- viii. All pertinent information is tabled at the Commercial Services Committee for a favourable recommendation and then forwarded to the Finance Committee for approval; and
- ix. Whenever the request is for a lease, the information is forwarded to the Ministry of Local Government and Community Development for the Minister's approval.

5.33 Having regard to the foregoing, the DI has found no evidence that Ms. Shirlyn Campbell's application complied with the required steps in the approval process as outlined by the SAMC. Furthermore, there is no evidence to indicate that Ms. Campbell's application was referred to the Ministry of Local Government and Community Development for approval



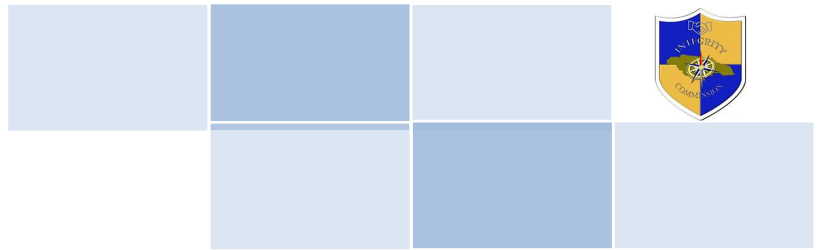
concerning the lease or rental of a shop or open space in the Ocho Rios Transportation Centre.

Status of building/structure

5.34 The DI sought to ascertain whether the building erected by Ms. Shirlyn Campbell was operational and whether there was an agreed upon fee structure. By way of a statement dated June 24, 2024, Mr. Michael Belnavis, Mayor of the SAMC, indicated that “...As it pertains to the operations of the container that was erected in the Ocho Rios Transportation Centre, I went there just this weekend, that is over the period June 22-23, 2024, and it was operational.”¹⁷ Councillor Paul McFarlane and Mrs. Polyanna Myers, Supervisor (Acting), Ocho Rios Transportation Centre gave a similar account.

5.35 Mrs. Myers, Supervisor (Acting), Ocho Rios Transportation Centre and who is tasked with the collection of fees for shops in the Transportation Center, in a statement dated August 7, 2024, indicated, *inter alia*, that “... When I tek up duty on 8th of May 2023 and I came and saw some men working on it. No one never really seh anything to me like seh for example, a John container or anything. So, I don't know who owns it. I know it is open and I see it operating up to Monday, August 5, 2024. When I seh it is operating I see it open, I see persons going in and out. I have never collected any fees

¹⁷ Witness statement of Mr. Michael Belnavis, Mayor, St Ann Municipal Corporation, dated June 24, 2024



from the owners and operators of this container that was erected in the Ocho Rios Transportation Centre.”¹⁸

- 5.36 By way of an excerpt from the transcript of a Judicial Hearing held with Mr. Ian Bell on October 22, 2024, the following is highlighted in relation to whether the container is operational:

...CHAIRMAN: *So, what has happened to it now?*

A. *You asked me earlier if it is operational and I said yes.*

CHAIRMAN: *Have you received the necessary approvals?*

A. *It has not been.*

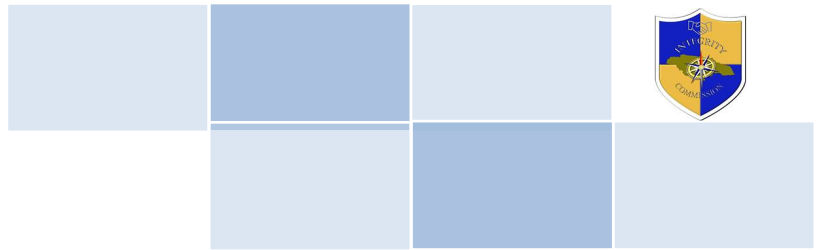
CHAIRMAN: *So, it is just going on without the approval.*

A. *Yes.*¹⁹

- 5.37 Having regard to the aforementioned representations, the DI notes that since Ms. Campbell began operating her business from the container she mounted in the Ocho Rios Transportation Centre in 2023, the SAMC has not communicated the monthly fee to be paid for the space to Ms. Campbell, nor has she paid any monthly fee to the SAMC.

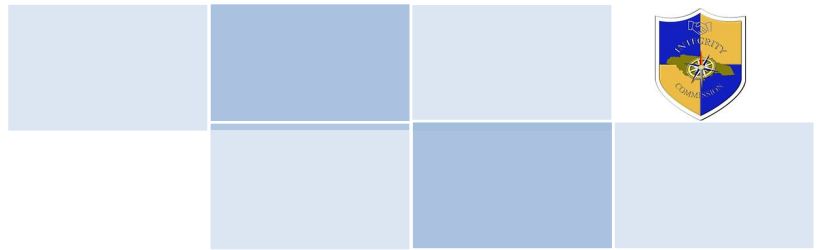
¹⁸ Witness Statement of Mrs. Polyanna Myers, Supervisor (Acting) Ocho Rios Transportation Centre, St AMC, dated August 7, 2024

¹⁹ Excerpt from the transcript of a Judicial Hearing held with Mr. Ian Bell on October 22, 2024,



Commercial Services Committee Deliberation Concerning Ms. Shirlyn Campbell's Application to the SAMC concerning the Ocho Rios Transportation Centre.

- 5.38 The DI highlights here that the Commercial Services Committee of the SAMC is a 'full Council' committee comprising all elected Councillors, along with administrative staff members of the Corporation. They meet monthly. The members for 2023, evinced by the Minutes of the meetings were: Ian Isaacs, Paul McFarlane, Ian Bell, Sydney Stewart, Cardell Wickham, Kim Brown Lawrence, Michael Belnavis, Rohan Davidson, Lydia Richards, Carlton Ricketts, Dalas Dickenson, Delroy Kelly, Genevor Gordon-Bailey and Winston Brown.
- 5.39 Having established the members of the committee for the relevant period, the DI sought to ascertain the nature and extent of the deliberations of the Commercial Services Committee Meeting which led to the approval of Ms. Shirlyn Campbell's application to place a 40ft container in the Ocho Rios Transportation Centre. The members of the Committee were interviewed, and their statements were recorded.
- 5.40 Ms. Ann-Marie Williams, Commercial Services Manager at the SAMC, advised that applications to be deliberated on at Commercial Services Committee meetings are referred to the Committee by the CEO of the SAMC.
- 5.41 By way of statement dated March 21, 2024, Ms. Kady-Ann Clarke, Budget and Revenue Officer, and Clerk of the Commercial Services Committee,



advised that “...As the clerk of the Commercial Services Committee, my role is normally when I go to the meeting on a monthly basis I would be going with an agenda with a list of items on it. The items on this list would be matters relating to: repairs to all of the self-finance entities such as the market and transportation centres; letters [from] persons who are interested in getting a space in the market or transportation centres for vending.”²⁰

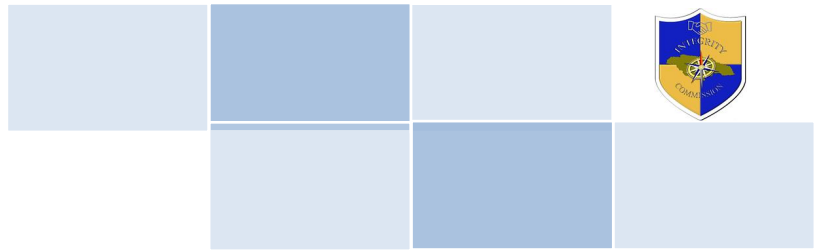
5.42 By way of statement dated August 7, 2024, Ms. Lasonya Williams, Secretary for the Commercial Services Unit and the Commercial Services Committee advised that “...I attend meetings of the Commercial Services committee and record what is said verbally and compile as a written document which I submit to the Clerk of the Commercial Services Committee for vetting. Vetting is done for accuracy and completeness. After vetting, if there are no errors, permission is granted by the Clerk of the committee to submit same minutes to the executive secretary.”²¹

5.43 Ms. Williams further advised that “...discussions, conclusions and the actions to be taken in relation to whatever matter is being discussed at the moment is recorded. The recordings are not paused or stopped in the meetings. The recordings run until the meeting is completed or until we reach the adjournment.”²² She also indicated that items not listed on the scheduled meeting agenda are brought to the meeting as a supplemental.

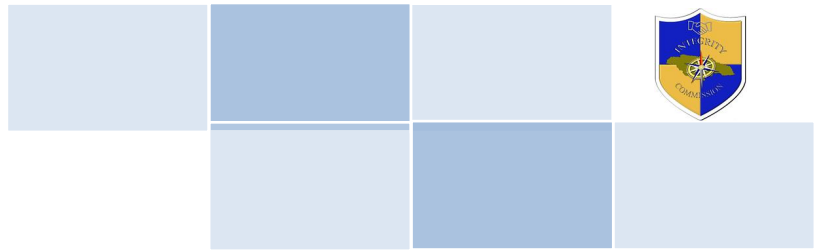
²⁰ Further statement of Ms. Kady-Ann Clarke, Budget and Revenue Officer and Clerk of the Commercial Services Committee dated July 23, 2024, p1

²¹ Statement of Ms. Lasonya Williams, Secretary, Commercial Services Committee dated August 7, 2024

²² IBID



- 5.44 The DI notes that items that are to be discussed at these meetings are listed on a meeting agenda, deliberations of the committee meetings are recorded, and a written record of these deliberations (meeting minutes) is prepared and disseminated to the Councillors and Heads of Department.
- 5.45 Having regard to the foregoing, the DI conducted an in-depth review of the audio recordings and meeting Minutes of the Commercial Services Committee, specifically, the meetings held on April 3, 2023, May 1, 2023 and June 5, 2023. However, the DI was unable to verify the discussion/deliberations held by the committee in relation to the application made by Ms. Shirlyn Campbell from the audio recordings.
- 5.46 Following a review of the Commercial Services Committee meeting Minutes for meeting held on May 1, 2023, the DI notes an entry under the heading ***"SUPPLEMENTAL"*** which reads ***"Application to Erect a container Ocho Rios Transportation Centre-Approved"***. By inference the DI deems this to be the application made by Ms. Campbell. Ms. Williams in her statement define a "supplemental" as any document that is not listed on a meeting agenda and is brought to the meeting to be tabled for discussion and consideration. The DI notes that this is the first Minutes of the Commercial Services Committee meeting the concerned application was captured.
- 5.47 A letter dated April 3, 2023, addressed to the Chief Engineering Officer from the Commercial Services Committee, directed that *"an investigation be conducted to verify if space existed suitable to house a container."* The DI notes that this particular letter is indicative of the application being

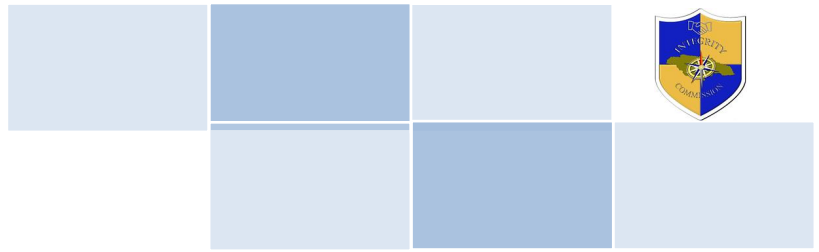


mentioned in the Commercial Services Committee meeting of the same date prior to referral. The Minutes of the referenced meeting however, does not capture the referenced application. On the basis of the date (March 31, 2023) of Ms. Campbell's application, and the date (April 3, 2023) of the referral from the Commercial Services Committee, to the Chief Engineering Officer, it is a reasonable inference that the Commercial Services Committee meeting, held on April 3, 2023, was the first mention of the concerned application at any meeting of the Commercial Services Committee.

5.48 Ms. Lasonya Williams, in her statement dated August 7, 2024, stated, *inter alia*, that "...I can recall a meeting of the Commercial Services Committee where an application concerning the erection of a container in the Ocho Rios Transportation Centre was discussed...I remember that the application was not on the meeting agenda... It was brought to the meeting as a supplemental... I recall that the name of the applicant was Ms Shirlyn Campbell. The application was brought to meeting by Councillor Ian Bell who was a member of the committee at the time." ²³.

5.49 The DI highlights that the meeting records only reflect Ms. Williams as being present at the June 5, 2023 meeting. This was the meeting wherein the application was referred to the Finance Committee.

²³ Witness statement of Ms. Lasonya Williams, Secretary of the Commercial Services Committee, dated August 7, 2024.



5.50 The DI highlights an excerpt of a Judicial Hearing held with Mr. Ian Bell on October 22, 2024 below, where Mr. Bell was asked about his awareness of the concerned application.

"Q. Mr. Bell, are you aware of an application that was made to the St. Ann Municipal Corporation for a space in the Ocho Rios Transportation Centre to be rented, containerized structure, 44-foot [40-foot] container?"

A. I am only so aware.

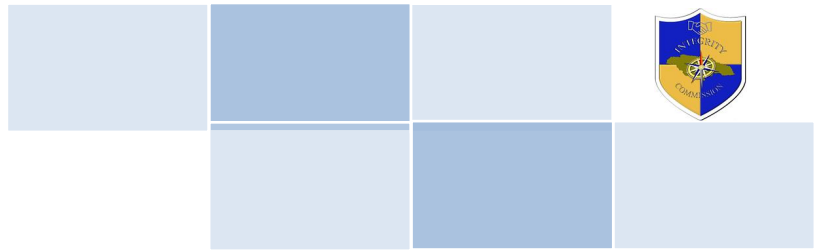
Q. Could you kindly repeat?"

A. I am only so aware.

Q. Thank you very much. How did you become aware of the application for space in the Ocho Rios Transportation Centre?"

A. I knew before it was read that the application was made by my wife [Shirlyn] Campbell ...

Q. You said that you knew before the application was brought before the meeting?"



A. *That there was an application. I did not know that it was coming that day, but I knew that there was an application made by my wife.*

Q. *When was the first time you became aware of the application?*

A. *I don't understand the question again. I said I knew before it went to Council that my wife was making the application, so that would be the first time when she was making the application. Am I correct, Chair?*

CHAIRMAN: *I don't know if you are.*

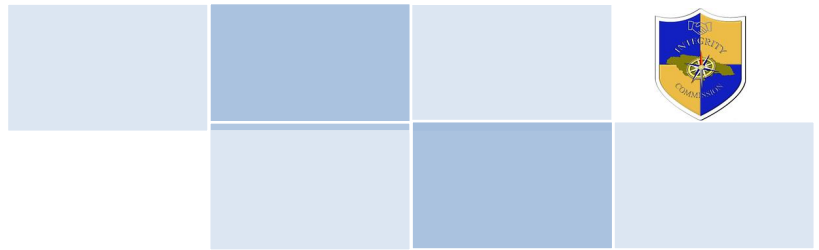
A. *Based on my answer.*

CHAIRMAN: *When did you become aware of it at first?*

A. *When she was going to make the application.*

CHAIRMAN: *Before the meeting?*

A. *Yes, at home.*



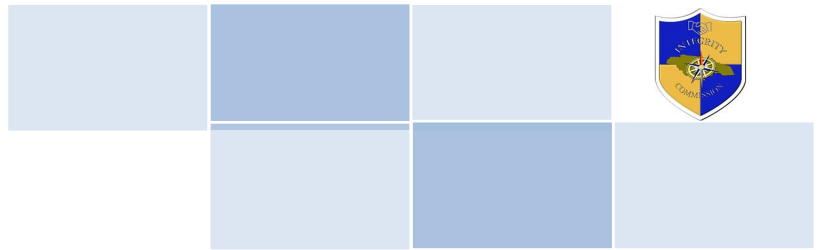
Q. *Was this application listed on the meeting agenda when it was introduced and presented to the Commercial Services Committee?*

A. *I can't recall. I can't recall that at all. I cannot honestly recall if it was listed, or if it came as a supplemental. I just can't recall that."*²⁴

5.51 Further, by way of a statement dated June 18, 2025, Ms. Shirlyn Campbell stated in respect of her application to the SAMC that "...the application was prepared by me with the help of my husband, Mr. Ian Bell. As it relates to how the application was delivered to the St. Ann Municipal Corporation, I asked my husband to drop it off for me. My husband goes to the Corporation on a daily basis, so I gave him to drop off for me."

5.52 The account of Ms. Patricia Christie, that the concerned application was not submitted through the registry as well as the account of Mrs. Campbell-Bell that she asked Mr. Bell to drop off the application for her, on balance, supports the position that Ms. Campbell's application to the Corporation was not submitted in accordance with the process outlined. This is further supported by Ms. Lasonya Williams' account that the concerned application was brought to the Commercial Services Committee meeting by Councillor Ian Bell. Notwithstanding the foregoing, Ms. William's absence, as reflected in the meeting records, from two (April 3 and May 1,

²⁴ Excerpt from the transcript of a Judicial Hearing held with Mr. Ian Bell on October 22, 2024,

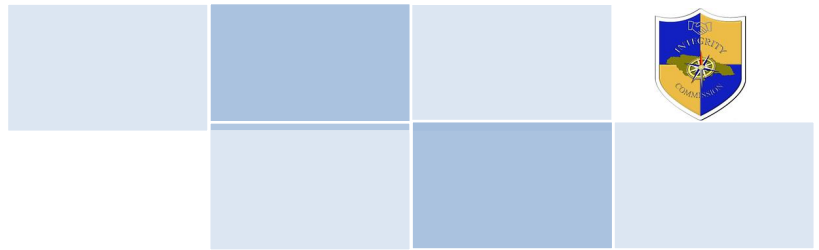


2023) of the three meetings in which the application was brought before the Council poses a difficulty. Efforts made to resolve this with Ms. Williams were unsuccessful as she was unwilling to engage further with the DI's representative.

- 5.53 The DI's review of the meeting Minutes of the referenced committee which was held on June 5, 2023, revealed a notation under the heading **"SUPPLEMENTAL"** which reads **"3. Costing of Container/truck body for ... and Shirlyn Campbell- Forwarded to finance"**. On the assumption that the applications mentioned in both meetings (May 1 and June 5, 2023) are one and the same, one could reasonably conclude that subsequent to the application being referred to the Chief Engineering Officer for investigation, the application was also referred to the finance committee for assessment.

These two referrals (Chief Engineering Officer and Finance) seem to be broadly consistent with the Corporation CEO's explanation of the applicable procedure germane to this kind of application. It must be however stated, that the records of the meetings, as presented, do not in any substantial way, assist in determining the committee's actual deliberations.

- 5.54 As indicated before, following a review of the Minutes of the Commercial Services Committee Meeting held May 1, 2023, the DI further observed that the Minutes did not capture the deliberations of the committee. However, the minutes captured Ms. Campbell's application to place a container in



the Ocho Rios Transportation Centre, which was listed under the heading **"SUPPLEMENTAL"**.

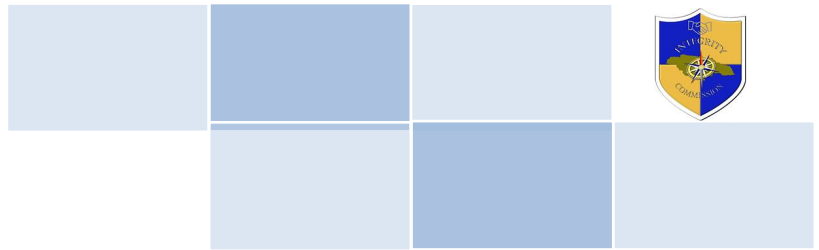
5.55 The DI notes further that the examined audio recordings of the meetings of the Commercial Services Committee in which the concerned application was mentioned and/or deliberated, also do not in any substantial way, assist in determining the Committee's actual deliberations. The copies of the recordings presented to the DI all ended prematurely and did not record the concerned deliberations. The Duration of the recordings are as follows:

- I. April 3, 2023 – 1:50:02 (1 hour, 50 minutes and 2 seconds)
- II. May 1, 2023 – 0:30:19 (30 minutes and 19 seconds)
- III. June 5, 2023 – 2:27:07 (2 hours, 27 minutes and 7 seconds)

At the conclusions of the recordings, the concerned application was not yet mentioned.

Allegation of Conflict of Interest Involving Councillor, Mr. Ian Bell, in the 'approval' of an application submitted by Ms. Shirlyn Campbell

5.56 Having regard to the allegation that Mr. Ian Bell, Councillor for the Beecher Town Division of the SAMC, used his wife's name, Shirlyn Campbell, to apply for approval to build and built a structure from which to conduct business in the Ocho Rios Bus Park of the Municipal Corporation, the DI sought to determine whether the applicant, Ms. Shirlyn Campbell, is affiliated with



any member of the SAMC and more particularly, Councillor Bell, the extent of their relationship and whether Ms. Shirlyn Campbell is the same person as Mrs. Shirlyn Campbell-Bell.

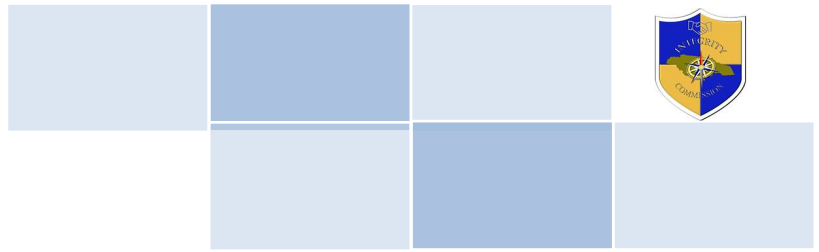
5.57 By way of statement dated May 17, 2024, Mr. Dalas Dickenson, Councillor for the St Ann's Bay Division, in response to whether the applicant was known to any member of the Commercial Services Committee, stated, *inter alia*, that "...At the time the application was presented to the committee I wasn't aware of who the applicant was because of the name that was on the application. The name that was used on the application was Ms. Shirlyn Campbell. I later became aware that the applicant was the wife of Councillor Ian Bell."²⁵

5.58 A similar account was provided by seven other Councillors: Sydney Stewart, Ian Isaacs, Carlton Ricketts, Winston Brown, Rohan Davidson, Michael Belnavis and Cardell Wickham.

5.59 By way of a Statement dated November 23, 2023, the Duly Authorised Officer at the Registrar General's Department confirmed that Ms. Shirlyn Campbell has been married to Mr. Ian Wayne Bell since November 18, 2018. The Duly Authorised Officer stated, *inter alia*, that "...at the time of the marriage, both parties resided in... St Ann. Ian was seen as a... Parish Counsellor and Shirlyn Campbell, a ...Businesswoman..."²⁶

²⁵ Witness Statement of Mr. Dalas Dickenson, Councillor, St Ann Municipal Corporation, dated May 17, 2024, p2

²⁶ Witness Statement dated, November 23, 2023, from the Duly Authorised Officer at the Registrar General's Department
INTEGRITY COMMISSION Concerning Allegations of Conflict of Interest and Irregularities in the Approval Process Related to the Rental/Lease of a Section of the Ocho Rios Transportation Centre and the Construction of a Commercial Building

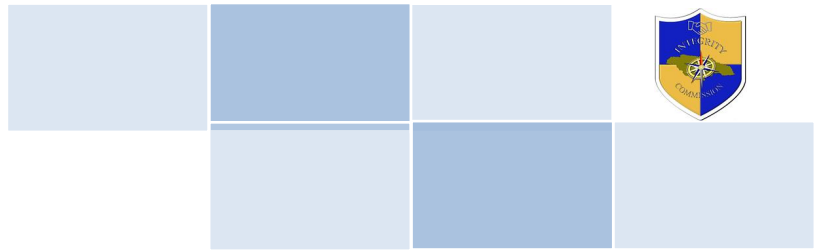


- 5.60 The DI highlights further, an excerpt from the transcript of a Judicial Hearing held with Mr. Ian Bell on October 22, 2024, where he stated that the concerned application was made by his wife Shirlyn Campbell and her married name Bell was not included on the application because they had a company before marriage and the intended business in respect of the application is in the company's name.
- 5.61 In a statement dated April 16, 2024, Ms. Shirlyn Campbell stated, *inter alia*: “...My name is Shirlyn Nicole Campbell-Bell, I am a Businessperson/self-employed. I reside... with my husband, Mr Ian Bell.”²⁷
- 5.62 Based on the foregoing, the conclusion can be drawn that Councillor Ian Bell is the Husband of the concerned applicant, Shirlyn Campbell. The conclusion can also be drawn that Shirlyn Campbell and Shirlyn Campbell-Bell are one and the same person.
- 5.63 As established above, the application in question was (based on the records) first brought before the referenced committee on April 3, 2023 and subsequently on May 1 and June 5, 2023.

Declaration of conflict of interest

- 5.64 Having established that the applicant Ms. Shirlyn Campbell is the wife of Councillor Ian Bell, the DI sought to ascertain from the Councillors of the Commercial Services Committee whether Councillor Ian Bell made any conflict of interest declaration to the Committee in respect of his wife's

²⁷Witness Statement of Mrs. Shirlyn Campbell-Bell dated April 16, 2024



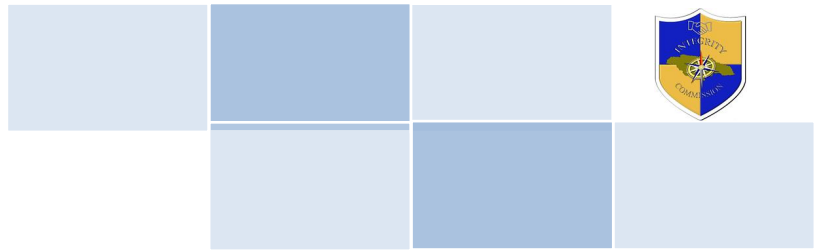
application. Twelve (12) Councillors and two (2) other attendees provided their account by way of witness statements.

5.65 Six (6) of the Councillors interviewed stated that Councillor Ian Bell declared that the concerned applicant is his wife. The Councillors however, were unable to specify the meeting(s) at which this declaration was made. Two (2) Councillors stated that Councillor Ian Bell did not declare that the concerned applicant was his wife. Four Councillors, for varying reasons were unable to say whether or not Councillor Bell made a declaration. Ms. Kady Ann Clarke, Budget and Revenue Officer and Clerk for the Commercial Services Committee stated that no disclosure was made in respect of the concerned applicant.

5.66 The DI notes that the meeting Minutes of the Commercial Services Committee held on the previously mentioned dates, where the concerned application was mentioned and/or deliberated on, all listed Councillor Ian Bell as being present. The Councillors in attendance are listed below:

Table 2

April 3, 2023	May 1, 2023	June 5, 2023
Mayor Sydney Stewart	Mayor Sydney Stewart	Councillor Genevor Bailey
Councillor Dalas Dickenson	Councillor Paul McFarlane	Councillor Rohan Davidson
Councillor Paul McFarlane	Councillor Michael Belnavis	Councillor Kim Brown Lawrence
Councillor Michael Belnavis	Councillor Delroy Kelly	Councillor Lydia Richards
Councillor Delroy Kelly	Councillor Cardell Wickham	Councillor Winston Brown
Councillor Cardell Wickham	Councillor Genevor Bailey	Councillor Carlton Ricketts
Councillor Genevor Bailey	Councillor Rohan Davidson	Councillor Ian Bell
Councillor Winston Brown	Councillor Ian Isaacs	Councillor Dalas Dickenson

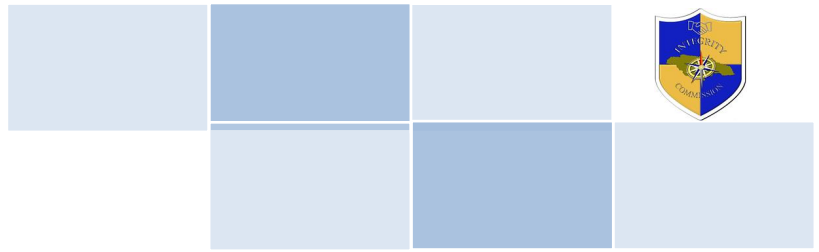


Councillor Rohan Davidson	Councillor Ian Bell	[Councillor Winston Lawrence]
Councillor Ian Isaacs	Councillor Kim Brown Lawrence	Councillor Michael Belnavis
Councillor Ian Bell	Councillor Lydia Richards	Councillor Cardell Wickham
	Councillor Winston Brown	Councillor Ian Isaacs
	Councillor Carlton Ricketts	

5.67 By way of a witness statement dated May 21, 2024, Mr. Winston Brown, former Councillor of the Borobridge Division of the St. Ann Municipal Corporation informed the DI that when the application was first raised at the Commercial Services Committee Meeting, Councillor Ian Bell was not present. Mr. Brown further stated that *"I recall this because Councillor Bell called me personally and asked me if a certain application by Shirlyn Campbell was mentioned. It was at the Commercial Services Committee meeting held directly after the application was first raised that Councillor Bell made it known that the applicant, Shirlyn Campbell was in fact his wife."*²⁸

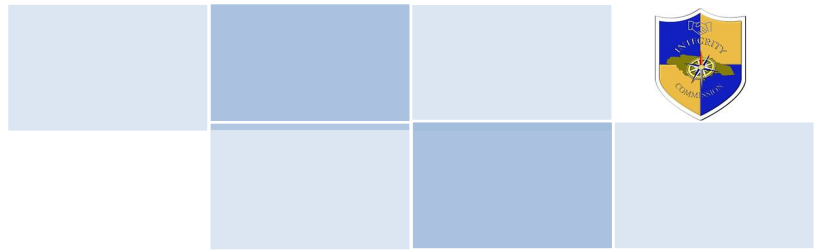
5.68 The DI notes that as previously mentioned, it is reasonable to infer that the meeting wherein the application was first raised, as mentioned by Mr. Winston Brown, is the Commercial Services Committee meeting of April 3, 2023. The DI notes further, that an examination of the recording of said meeting revealed that Councillor Bell was present at the commencement of the meeting. The recording however ended prematurely after one hour, fifty minutes and two seconds. At the conclusion of the recording Councillor Bell was still present at the meeting. The concerned application was not discussed throughout the duration of the recording of April 3, 2023. The DI is

²⁸ Witness Statement of Mr. Winston Brown, Former Councillor, Borobridge Division, St. Ann Municipal corporation
INTEGRITY COMMISSION Concerning Allegations of Conflict of Interest and Irregularities in the Approval Process Related to the Rental/Lease of a Section of the Ocho Rios Transportation Centre and the Construction of a Commercial Building



therefore unable to say whether Councillor Ian Bell left the meeting prior to its April 3, 2023 adjournment, as is alleged by Mr. Winston Brown.

- 5.69 The DI notes further that had Councillor Bell been present throughout the entirety of the meeting of April 3, 2023 where his wife's application was first mentioned, Mr. Bell had a duty, and ought to have declared his interest in respect of the concerned application at the referenced meeting.
- 5.70 Councillor Brown further stated that "...the application was first presented at the Commercial Services Committee Meeting... The application was recommended to the Trust and Estate Committee who should have recommended the application to the Finance Committee for approval. The Trust and Estate Committee, rather than recommending the application to the Finance Committee for approval, approved the application themselves."
- 5.71 The DI notes that the aforementioned statement by Mr. Winston Brown is inconsistent with the established procedure, as outlined by the CEO, in treating with applications of this nature. The evidence, as presented, also indicate that the application was referred to the Finance Committee and not the Trust and Estate Committee, as stated by Mr. Brown.
- 5.72 The DI sought to ascertain from Mr. Bell, how a conflict of interest matter ought to be treated with under these circumstances. Mr. Bell, by way of the Judicial Hearing held on October 22, 2024, stated the following:

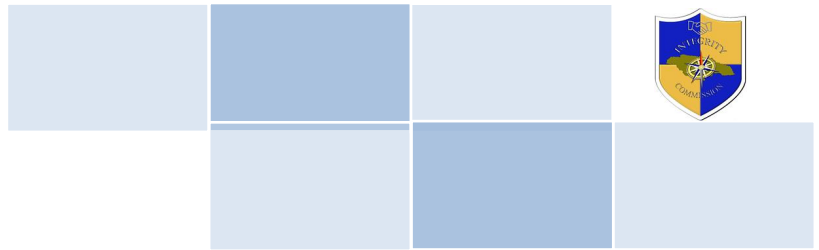


“The member knowing that he or she has an interest, the member would indicate to the committee that I have an interest in that matter because of so and so. Having done that the Chairman has a responsibility to ask the member to leave and when the matter is finished the Chairman will send somebody to call the member. If the Chairman does not ask the member to leave, the member will not leave but the member will not participate in the discussions.

When I was Chairman any such indication that was raised to me, I ask what are your interest, and based on the circumstances I will say, well based on the explanation the Chairman is going to ask you to recuse yourself at this time, and when the matter is disposed of we will call you. There are some circumstances where the Chairman does not ask the member to recuse him or herself but ask the member not to participate in any way, shape or form.”

- 5.73 The DI highlights the **Councillor’s Handbook**, a document which serves as a guide to Councillors’ actions and which may be found on the website of the Ministry of Local Government and Community Development. **Chapter 8**, titled **Council Procedures, page 38, paragraph three (3)** states as follows:

*“Council decisions are a matter of public record. You have been elected to make decisions. This means that all Council members should vote on all resolutions and by-laws unless required to refrain from voting. **In that case, you must withdraw from the meeting and not vote on matters in which you have a monetary interest.** You must also disclose the direct or indirect monetary or business interest, and refrain from voting, discussing or attempting to influence the matter.*



Remember that it is your personal responsibility to ensure your behavior does not create a conflict of interest!!"

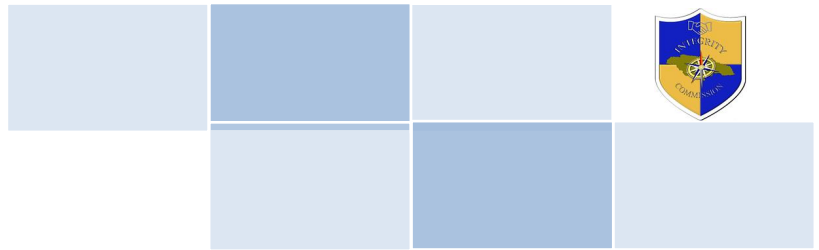
- 5.74 The DI sought to ascertain directly from Mr. Bell whether he made a conflict of interest declaration in respect of his wife's application. By way of the aforementioned Judicial Hearing held with Mr. Ian Bell on October 22, 2024, he stated the following in respect of a Commercial Services Committee of the St. Ann Municipal Corporation:

"As it was read, I said, Mr. Chairman, the applicant is my wife... I know that maybe one or two members would have said, what Bell sey, a him wife? And I said, yes, it is my wife..."²⁹

- 5.75 A majority six of the attendees at the referenced Commercial Services Committee meetings held on April 3, 2023, May 1, 2023 and June 5, 2023 where the concerned application was mentioned, who were interviewed, stated that Councillor Bell declared his affiliation with the concerned applicant. On this basis, it can be inferred that he did in fact declare his affiliation. The DI is however constrained in definitively concluding that Councillor Ian Bell declared his affiliation with the concerned applicant, Shirlyn Campbell-Bell.

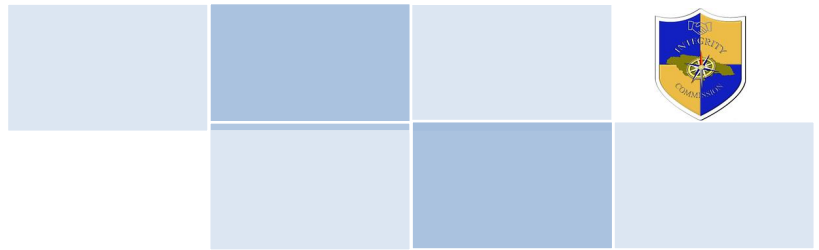
- 5.76 Due to the interviewees being unable to recall the specific Commercial Services Committee meeting at which Councillor Bell declared his affiliation with the concerned applicant, the DI is also unable to conclude at which

²⁹ Excerpt from the transcript of a Judicial Hearing held with Mr. Ian Bell on October 22, 2024.



of the concerned meeting(s) Councillor Bell declared his affiliation with, Mrs. Shirlyn Campbell-Bell, if this was at all done.

- 5.77 The DI then sought to ascertain whether Mr. Bell withdrew from the meeting and/or participated in any deliberation in respect of the concerned application, in keeping with Chapter 8 of the **Councillor's Handbook**, titled Council Procedures, page 38, paragraph three (3) states that “...**you must withdraw from the meeting and not vote on matters in which you have a monetary interest**”. Mr. Bell stated that *“I don't remember, honestly... but I am sure that the Chairman did not ask me to recuse myself and I did not offer to the Chairman, because the chairman's responsibility is to chair the meeting in the appropriate way according to the by-laws. But what I can attest to the fact is that from I said, yes, it is my wife, I said nothing further in that meeting.”*
- 5.78 Mr. Bell further stated that *“...the Chairman has a responsibility having gone on the training, and from the minute I indicated that it is my wife, even if he never remember what the protocol says – I can't walk out of a Committee meeting unless I ask permission. I would not ask permission to leave because I thought if you are asked to lead you must lead. The responsibility the Chairman has is to say, members, the member from Beacher Town indicated that it is his wife, or the Clerk to the committee should advise the Chairman since the member from Beacher Town indicated that it is his wife, could you ask the member to leave the room until the matter is dealt with. Nobody do anything so I take it for granted because as I indicated before, it depends on the ruling of the Chairman... To be frank with you, I don't*



remember who was chairing the meeting that day, but I know there was a Chairman and the Clerk was there and the Secretary was there. The Clerk was not new to the committee, the Clerk has been there for many years".³⁰

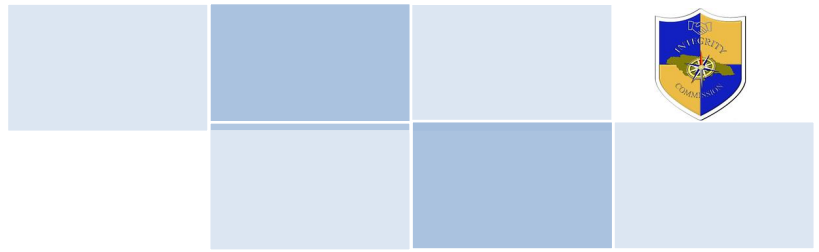
5.79 The DI highlights that by his own admission, Mr. Ian Bell has been a member of the Commercial Services Committee for nineteen (19) years and was the chairman for said committee for the period 2007 to 2016.

5.80 Councillor Rohan Davidson and Ian Isaacs, by way of witness statements informed the DI that after declaring his familial relationship with the applicant, Councillor Ian Bell remained in the meeting but he did not take part in the discussion concerning his wife's application. This position was also supported by other Councillors who were present at the referenced meeting with the exception of Councillors Winston Brown and Michael Belnavis, who stated to the contrary, that Councillor Bell participated in discussions surrounding his wife's application. Councillor Belnavis, by way of a witness statement dated June 24, 2024, stated particularly that *"I recall that Councillor Bell was vocal in the meeting surrounding the monthly fee/price."*³¹

5.81 The DI notes the referral to the Finance Committee from the Commercial Services Committee dated June 6, 2023 which states as follows

³⁰ Excerpt from the transcript of a Judicial Hearing held with Mr. Ian Bell on October 22, 2024,

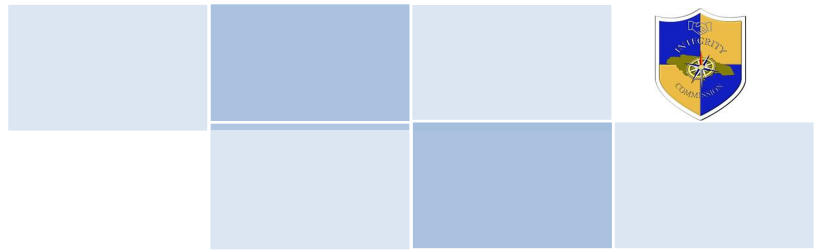
³¹ Witness Statement of Councillor Michael Belnavis dated June 24, 2024



"Please be advised that at the last sitting of the Commercial Services Committee Meeting held on Monday June 6 [Sic] 5, 2023, the committee decided to direct the captioned matter for approval being sought for Shirlyn Campbell... to pay Thirty Thousand Dollars (30,000.00) for monthly fee..."³²

- 5.82 Consequent on the foregoing, the DI attempted to verify whether the Commercial Services Committee meeting mentioned by Councillor Michael Belnavis, in which Councillor Bell was alleged to have been vocal in respect of the monthly costs and where the costing of the concerned application was deliberated, is the meeting of June 5, 2023. The audio recordings of the Commercial Services Committee meeting of June 5, 2023 was examined, however, as previously mentioned, the audio recording of the referenced meeting was prematurely ended prior to the concerned application being mentioned. Consequently, the DI is unable to substantiate the position of Councillor Belnavis in respect of Councillor Bell's participation in the referenced meeting.
- 5.83 Having regard to the foregoing, the DI notes that Councillor Ian Bell, a member of the Commercial Services Committee of the SAMC, attended the committee meeting where his wife, Mrs. Shirlyn Campbell-Bell's application was deliberated on. The evidence suggests that he did not recuse himself from the meeting, nor was he asked by the chairman or anyone present to exit the meeting.

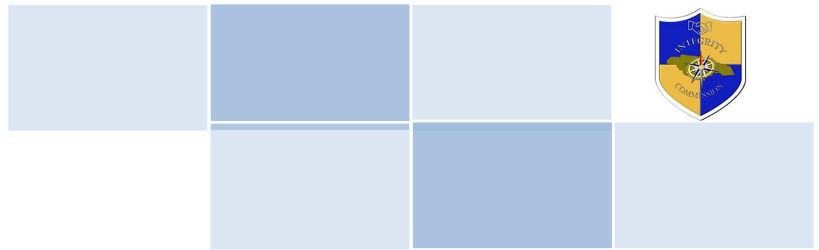
³² Letter directed to the Finance Committee from the Commercial Services Committee dated June 6, 2023.



Further involvement by Councillor Bell

- 5.84 By way of the aforementioned Judicial Hearing held on October 22, 2024, Mr. Ian Bell indicated that one Saturday, sometime in 2023, the CEO and other Municipal Officers were touring the Ocho Rios Transportation Centre. He mentioned that he invited the CEO to look at the container and the location where it was placed. Mr. Bell stated that *"... The Monday that followed that Saturday I was informed by the Caucus Leader, Councillor Winston Brown, that the CEO would like to have a meeting with both of us, along with the Mayor of the Municipality, Sydney Stewart and the Deputy Mayor, Dallas Dickenson. During the meeting, the CEO pointed out that, based on the type of building that she saw out there it is going to need an approval because it is a container."*³³
- 5.85 By way of a statement dated May 17, 2024, Mr. Dalas Dickenson indicated that *"...I became aware that there were issues at the Ocho Rios Transportation Centre facility which led me on a tour of the bus park which is very close to the market. The tour party consisted of the Minister of Local Government and Community Development, the Honourable Desmond McKenzie, Mayor, Deputy Mayor, Chief Executive Officer and the Chief Engineering Officer. While on the tour of the Ocho Rios Transportation Centre I saw a container. It was later highlighted that this was the container that the applicant, Ms Shirlyn Campbell, had applied for a space to install. While on the tour a particular Councillor turned up. The name of this*

³³ Excerpt from Judicial Hearing held with Mr. Ian Bell on October 22, 2024



Councillor was Mr. Ian Bell. He said that this is the container that his wife had applied for the space to install. I did not say anything further.”³⁴

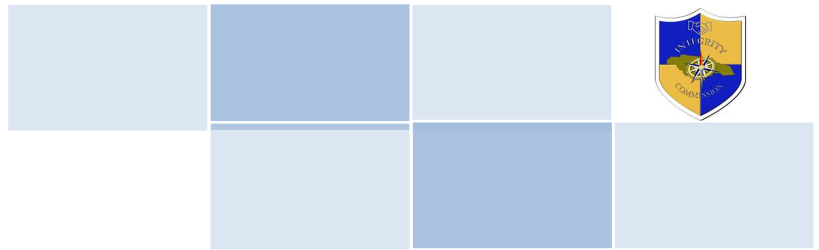
5.86 In a statement dated May 21, 2024, Councillor for the Bamboo Division in North West St. Ann (then Mayor), Mr. Sydney Stewart, indicated that he became aware of the identity of the applicant during a discussion with the CEO of the SAMC and that the applicant was Councillor Ian Bell's wife. He stated, *inter alia*, that “... In the discussion with the CEO, she mentioned that additional information was necessary and so we needed to speak with Mr. Bell and so we called him in for a meeting and indicated that the fact that the applicant is his wife, he needed to declare an interest in the project, if any.”³⁵

5.87 Mr. Stewart also noted that “...During the course of this meeting held with Mr. Ian Bell, Mrs. Brown-Cunningham and myself, I indicated that as a member of the Committee he had to declare and disassociate himself from the application and the project. To my recollection, initially, there was some resistance from Mr. Bell however, after a long discussion he agreed to write the letter disclosing his interest and affiliation with the applicant. He agreed. Ultimately, after seeking external advice he decided not to declare his affiliation or relationship with the applicant because it was not necessary.”³⁶

³⁴ Witness Statement of Mr. Dalas Dickenson, Councillor, St Ann Municipal Corporation, dated May 17, 2024, p2

³⁵ Witness Statement dated, May 21, 2024, from Mr. Sydney Stewart, Councillor, Bamboo Division of the SAMC

³⁶ IBID



5.88 As it relates to the matter of conflict of interest, **section 4.2.9 of the Staff Orders for the Public Service, 2004**, indicate as follows:

“(i) A conflict of interest may be deemed to exist under any of the following circumstances:

...

(b) Using information and/or any material gained from official position for private gain;

© Exploiting the status and privilege of one’s position for private gain;

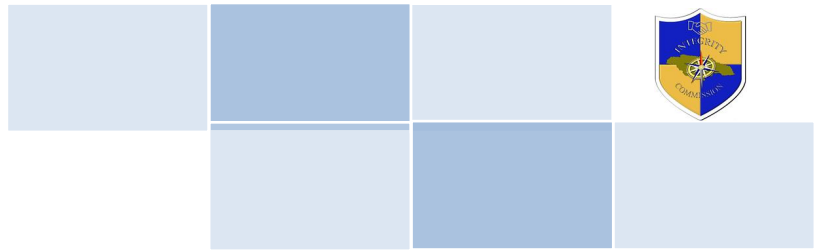
...

(f) Engaging in transactions with relatives or family members, or an organisation in which relatives or family members have an interest;

(ii) In order to address the potential for conflict of interest, officers should in all instances inform the appropriate authority of any such undertaking, seek clarification and get permission”

5.89 Further, the **Organization for Economic Cooperation and Development (OECD) Policy Brief 2005**, defines a conflict of interest as “a conflict between the public duty and private interests of a public official, in which the official’s private capacity interest could improperly influence the performance of their official duties and responsibilities.”

5.90 The DI highlights here, the Ministry of Local Government and Community Development Councillor’s Handbook, which states that “...Councillors are required to set good examples for their constituents, and the Code of Conduct requires them to perform the functions of office in good faith,



honesty, and in a transparent manner”. Chapter 12 of the referenced Handbook provides that Councillors should not:

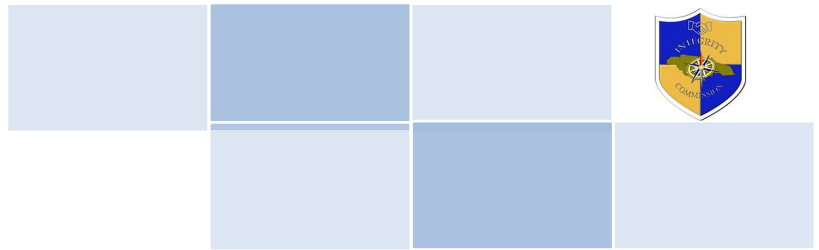
- (a) *“Do anything which will bring the Council or their office into disrepute; and*
- (b) *Misuse their official position to their own advantage or to the advantage or oppression of others.”*

5.91 Having regard to the provisions and the accounts provided, it is clear that the deliberations that led to the ‘approval’ of the referenced application may have been tainted by Councillor Ian Bell’s involvement (direct and indirect) in the approval and post-approval processes/events.

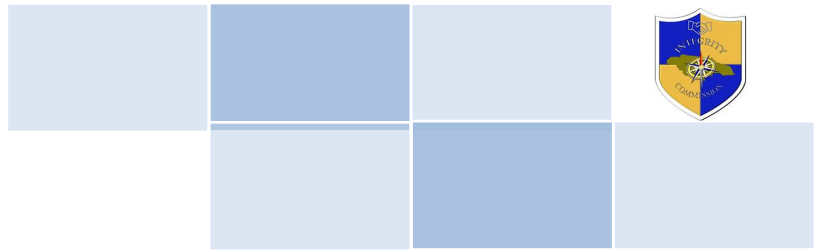
Ministry of Local Government and Community Development’s Audit

5.92 On January 9, 2024, Mrs. Jennifer Brown-Cunningham, CEO of SAMC, advised the DI that the matter concerning the approval for lease of a ‘stipulated area’ to house a gaming lounge in the Ocho Rios Transportation had been reported to the Ministry of Local Government and Community Development (MLGCD), and an audit was conducted. The DI is in receipt of the Audit Report dated August 22, 2023, which highlighted the following key findings in relation to the referenced approval process:

- I. *The application process violated the Policy Framework and Procedural Manual for the Divestment of Government-Owned Land, 2015;*



- II. *On receiving a formal expression of interest, the Municipal Corporation should invite the prospective applicant to an interview to formalize and initiate the evaluation process;*
- III. *A permanent structure is being constructed, the building plan should be submitted and reviewed to ensure compliance and suitability based on The Building Act 2018. No building plan was submitted to initiate the process;*
- IV. *On ratification by the Finance Committee, a request for permission to lease the land must be sent to the Ministry of Local Government and Community Development seeking the Minister's approval. No approval was given before the building was erected;*
- V. *Based on the date by which the 'approval' letters were subsequently issued (May 1, 2023 & May 10, 2023) by Kady-Ann Clarke Actg. Accountant Budget and Revenue, it is implied that sufficient research was not conducted and that steps within the application process was omitted; and*
- VI. *It is a Conflict of Interest to participate in the decision-making process of which you are a benefactor. To facilitate an unbiased decision, the Councillor should have declared his*

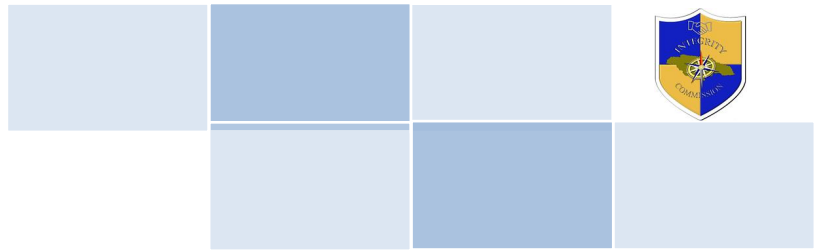


interest (that the applicant was his spouse) and recused himself during the deliberation. ³⁷

5.93 The DI notes that based on the audit conducted, the Ministry of Local Government and Community Development considers the structure erected by Mrs. Shirlyn Campbell-Bell to be a permanent structure which “would imply that the requirements of the lessee are long term in nature”.³⁸ The permanency of the structure requires the submission of a Building Plan and the issuance of a Building Permit as well as referral to the MLGCD for the Minister’s approval before the commencement of construction.

³⁷ Internal Audit Report of the Ministry of Local Government and Community Development dated August 22, 2023, titled: Lease of Transportation Centre in St Ann

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Chapter 6 – Conclusions

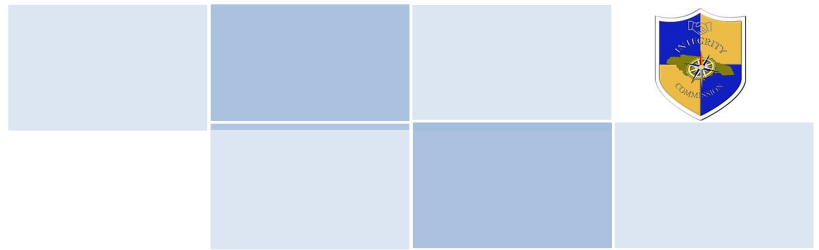
6.0 This chapter outlines the conclusions drawn by the DI.

Application made by Ms. Shirlyn Campbell Bell to the SAMC Concerning the Ocho Rios Transportation Centre

6.1 The DI concludes that on March 31, 2023, Ms. Shirlyn Campbell, a businesswoman, by way of a letter, applied to the St. Ann Municipal Corporation for the rental of a section of the Ocho Rios Transportation Centre, to place a 40ft container from which to operate a gaming lounge.

6.2 The DI concludes that the manner in which Ms. Campbell-Bell's March 31, 2023-application was presented to the Commercial Services Committee departed from the process established by the SAMC for such applications, and that this departure contributed to the errors in the SAMC's subsequent treatment of the application. This conclusion rests on evidence from three independent sources. First, Ms. Patricia Christie, Records Clerk at the Registry Department, stated that the application bore no Registry date stamp, which she said is proof that it did not pass through the Registry in the ordinary course. Second, Mrs. Shirlyn Campbell-Bell's own statement confirms that she did not submit the application herself, but asked her husband, Councillor Ian Bell, to deliver it on her behalf. Third, Ms. Lasonya Williams, Secretary of the Commercial Services Committee, recalled that the application was brought to the Committee by Councillor Bell as a 'SUPPLEMENTAL' – that is, a matter not listed on the meeting agenda in advance – rather than through the ordinary referral chain from the Registry

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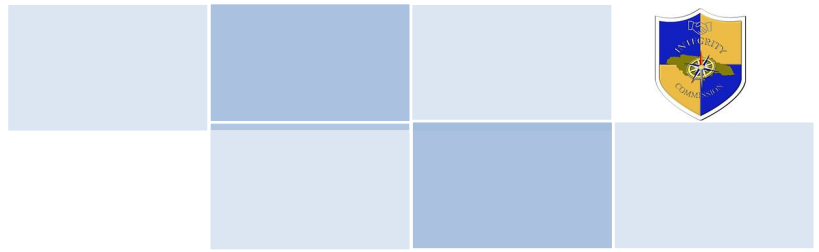


to the Chief Executive Officer to the Committee. The DI is mindful that Ms. Williams' account should be weighed with some caution, as the meeting attendance records show her as absent from two of the three relevant Committee meetings, a discrepancy she was unwilling/unable to resolve when it was put to her. However, her account of how the application reached the Committee is materially consistent with, and independently corroborated by, both Ms. Christie's documentary evidence and Mrs. Campbell-Bell's own admission, and the DI places weight on it only to that corroborated extent. Taken together, this evidence supports the finding that the application circumvented the Registry Department and the Chief Executive Officer, thereby removing the opportunity for the due diligence checks that would ordinarily be applied before an application is referred to the Commercial Services Committee.

Had the process not been circumvented, the SAMC would have been better positioned to analyse the application and determine the right procedures to be adopted for this particular application.

The DI finds Mr. Ian Bell's inability to recall the manner in which the concerned application was presented to the Commercial Services Committee curious.

- 6.3 The DI confirms the existence of a containerised structure in the Ocho Rios Transportation Centre erected by Mrs. Campbell-Bell. A gaming lounge is being operated from this structure.



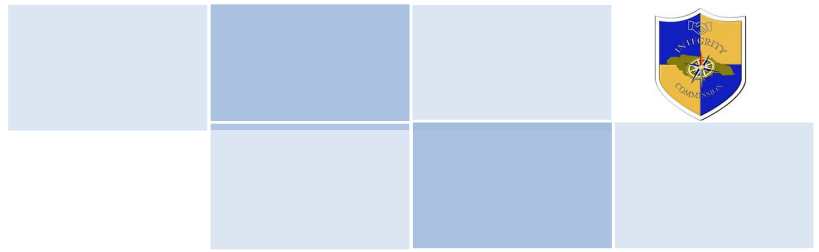
Process Regarding the Grant of Building Approval and the Rental of Shops and/or Open Space within Commercial Entities owned and operated by the SAMC

- 6.4 Notwithstanding Ms. Shirlyn Campbell's production of an approval letter dated May 1, 2023, issued to her by the SAMC, the DI concludes that Mrs. Bell was required to obtain the necessary building approval prior to her commencing construction/installation of the structure. Having not done this she circumvented the building approval process.

The DI's conclusion is based on the fact that a subsequent letter dated May 10, 2023, was directed to Ms. Campbell from the Corporation, notifying her of the requirements for the erection of a container as mentioned in her application. The subsequent letter included a Building Application Checklist, which outlined the requirements, such as proof of ownership detailed plans, a location map, site plans, and construction drawings for both the floor and roof plans. The DI further concludes that the applicant, Ms. Shirlyn Campbell, submitted building plans to the Planning Department of the Corporation on July 27, 2023, that is, two (2) months after the erection of a containerised structure.

Having regard to the aforementioned, the DI further concludes that up to the date of this report, the building plans have not been approved/issued by the St. Ann Municipal Corporation; however, a building has been erected and is operational, in violation of **section 17(1)(a)** of the **Building Act, 2018**, which states that:

“(1) A person shall not carry out building work unless –

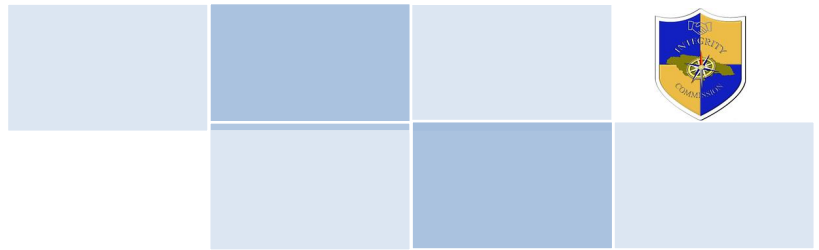


(a) a building permit in respect of the building work has been issued to him;

(b) where applicable, a planning permit has been issued to him under the Town and Country Planning Act.”

6.5 The DI further concludes that it is the responsibility of the SAMC to have effectively communicated with the applicant, Shirlyn Campbell, the specific requirements for the erection of the container in the Ocho Rios Transportation Centre, for which she applied, in a timely manner for the avoidance of any ambiguity. The DI finds that the tone of the letter dated May 1, addressed to the applicant indicating that “...*the St. Ann Municipal Corporation has decided to approve your request. Let me, on behalf of the Corporation wish you all the best in your future endeavours.*” indicates finality and that the applicant has been granted the necessary permission in respect of her application. On this basis, she commenced the works necessary in order to place the container in the Transportation Centre. The SAMC bears some level of responsibility for the applicant's breach of the **Building Act**, having failed in their duty to effectively and timeously communicate the necessary requirements to the applicant.

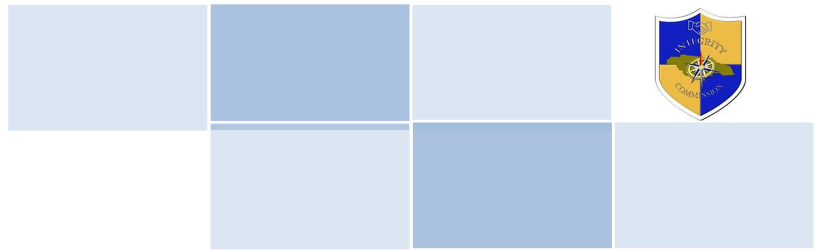
6.6 Additionally, the DI finds that upon receipt of the application from Mrs. Campbell-Bell, the SAMC ought to have invited her to an interview to formalize and initiate an evaluation process, which they failed to do. This would have given the SAMC a better understanding of the applicant's intentions and better position the entity to proffer the right procedural advice to the applicant. Had this been done, the Municipal Corporation



would have also determined that while the applicant intended to rent a space, the requirement would be for a lease arrangement rather than rent due to the permanency of the intended structure. Under these circumstances, the process to lease the land/space is now transferred to the MLGCD from the local authority, where the final approval of the Honorable Minister is required.

- 6.7 The DI concludes that based on the evidentiary materials reviewed during the investigation, there is no evidence to verify the existence of a rent or a lease agreement between Ms. Shirlyn Campbell and/or Mr. Ian Bell and the St. Ann Municipal Corporation. Additionally, there is no evidence to indicate that Ms. Campbell's application was referred to the Ministry of Local Government and Community Development for approval as is required.
- 6.8 The DI concludes that since Ms. Campbell began operating her business from the container she mounted in the Ocho Rios Transportation Centre in 2023, there is no evidence of any fees being paid to the Corporation or any attempts made by the Corporation to collect the applicable fee in accordance with the obligation/responsibilities of self-financing entities.

The DI's conclusion is based on three main accounts. First, Mrs. Campbell-Bell admitted that she does not pay a monthly fee and she was never approached by the Municipal Corporation for payment. Secondly, the statement of the Chief Financial Officer of the SAMC that the Corporation has not received any payment from the operators of the container. Third,

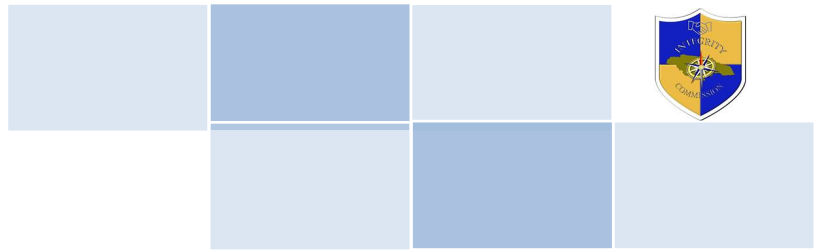


the duly authorized officer of the SAMC with the responsibility to collect fees from entities operating in the Ocho Rios Transport Center stated that she has never collected any fees from the owners and operators of the container that was erected in the Ocho Rios Transportation Centre. She also indicated that she was never directed by her supervisor to collect any fees from the owners and occupiers of the container and she did not enquire why.

Conflict of Interest

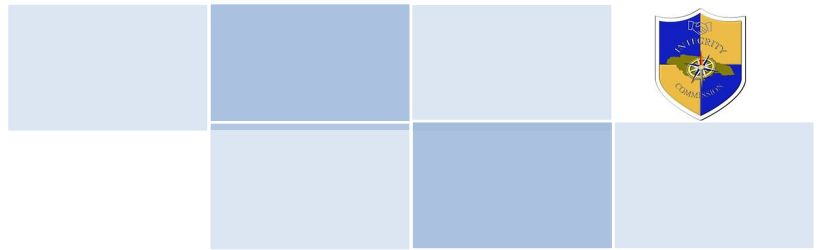
6.9 The DI concludes that Councillor Ian Bell, a member of the Commercial Services Committee of the St. Ann Municipal Corporation, attended in the committee meeting where his spouse, Ms. Shirlyn Campbell/Mrs. Shirlyn Campbell-Bell's application was deliberated on. More importantly, the question of conflict of interest arising from the foregoing circumstances was not appropriately considered and addressed within the context of the meeting or otherwise. The principles of good governance, government policy and best practice dictate that the question of conflict of interest ought to have been substantively addressed and a decision made as to whether there existed a conflict of interest (actual or potential) and whether on that basis, Mr. Bell ought to have been recused from the proceedings.

6.10 Having reviewed the facts, admissions, and circumstances surrounding the conflict of interest issue in this matter, the DI concludes that Councillor Bell acted in breach of the Ministry of Local Government and Community



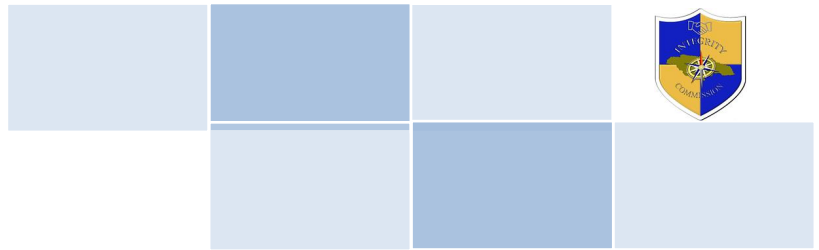
Development Councillor's Handbook, in respect of conflicts of interests and the established principles of good governance, transparency, accountability, and integrity expected of elected officials by not withdrawing from the meetings at which his wife's application was discussed. Chapter 8, titled Council Procedures, page 38, paragraph three (3) of the **Councillor's Handbook** specifically states that "Council decisions are a matter of public record. You have been elected to make decisions. This means that all Council members should vote on all resolutions and by-laws unless required to refrain from voting. In that case, **you must withdraw from the meeting** and not vote on matters in which you have a monetary interest".

- 6.11 The evidence demonstrates that Councillor Bell was fully aware of the applicable procedural requirements for the declaration and management of a conflict of interest arising within the Commercial Services Committee. Importantly, the conflict of interest in question concerned Councillor Bell himself, as the matter before the Committee involved an application submitted by his wife. In those circumstances, Councillor Bell had a direct personal interest in the proceedings and was under a heightened obligation to ensure that the applicable conflict of interest procedures were strictly observed.
- 6.12 Councillor Bell admitted that he possessed prior knowledge of the correct procedure, having previously served as Chairman of the Committee and having been a longstanding member thereof. Despite this knowledge and experience, he consciously chose not to intervene or provide guidance

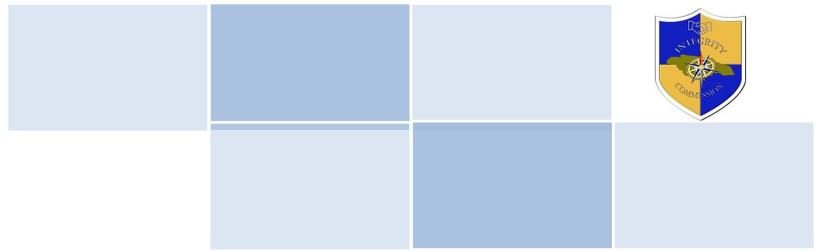


when the sitting Chairman failed to follow the proper procedure for addressing the conflict of interest. He stated that “it was not my job to assist the Chair.”

- 6.13 While responsibility for the conduct of proceedings rests primarily with the presiding Chairman, Councillor Bell, as the individual whose personal interest gave rise to the conflict, bore an even greater responsibility to ensure transparency and procedural compliance. His deliberate decision to remain silent, despite recognising that the proper process was not being followed, constituted conduct inconsistent with both the letter and spirit of the Ministry of Local Government and Community Development Councillor's Handbook, in respect of conflicts of interest and the ethical obligations expected of public officials.
- 6.14 The failure to properly manage the conflict of interest created a reasonable perception of impropriety and undermined public confidence in the fairness, impartiality, and integrity of the Committee's decision-making process. Councillor Bell's omission cannot reasonably be viewed as passive non-involvement; rather, it amounted to acquiescence in a procedural breach from which he stood to derive at least an indirect personal benefit through the application submitted by his spouse.
- 6.15 The DI concludes that Councillor Bell failed to uphold the standards of conduct expected of a Councillor and contributed, by omission and conscious inaction, to the improper handling of a conflict of interest matter in which he had a direct personal connection.



- 6.16 The DI concludes that the evidence revealed that Councillor Ian Bell was engaged by the Chief Executive Officer and then Mayor of the St. Ann Municipal Corporation concerning the application, after it was made; this, too, is improper. Also, the Chairman and Committee Members of the Commercial Services Committee meeting had an important role to play in ensuring compliance with the Conflict of Interest Policy; this they failed to act upon. The DI notes that while the connection between Councillor Ian Bell and the applicant was not immediately known by all the attendees of the committee meeting, remedial steps should have been taken after the fact and once the affiliation became known.
- 6.17 Respecting the omission of Mrs. Campbell Bell's married name from her application to the Corporation, the DI finds this misleading and wholly improper. Further, this omission when viewed in all the circumstances outlined herein, may to the mind of the reasonable and detached observer be regarded as deliberately deceptive and dishonest.

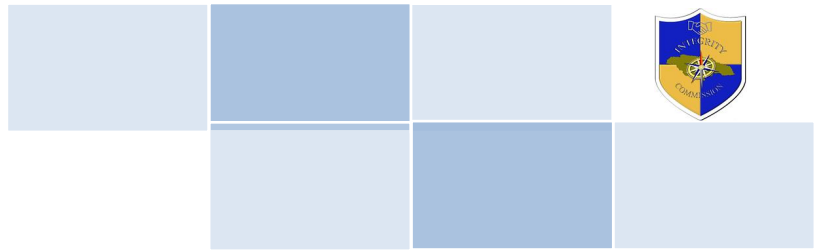


Chapter 7 – Recommendations

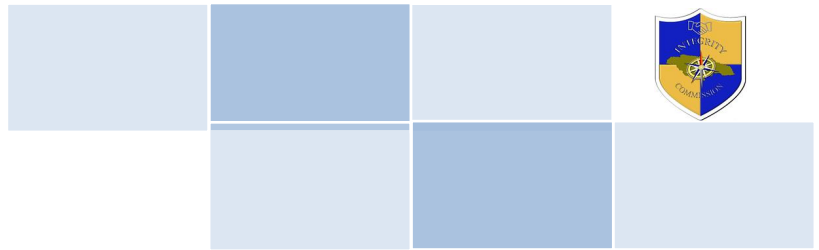
- 7.0 Having regard to the findings made herein, the DI recommends to the Commission that copies of this report be referred to the public officials and/or parliamentarians identified below in accordance with **section 54 (3) (a) (i) and (ii)** of *the Integrity Commission Act* for appropriate action.

Recommendations to the Chief Executive Officer, St. Ann Municipal Corporation

- 7.1 The DI recommends that the St. Ann Municipal Corporation ensures that all Councillors and employees are *au fait* and conform with the established process concerning approval for rental and/or lease of shops and open spaces in commercial entities owned and operated by the Corporation. The DI further recommends that this process be published in a conspicuous manner and place where persons wishing to engage with the SAMC in this regard, will have direct and unhindered access, for their guidance.
- 7.2 The DI also recommends that the St. Ann Municipal Corporation ensures that written communication is clear and unambiguous when directed to applicants, in respect of the Corporation's decision relating to building applications for commercial entities who wish to erect structures on property owned and operated by the Municipal Corporation. The Corporation should also ensure that all approval processes and ratification are completed prior to notifying an applicant of the outcome of their application, which prevents any misunderstanding on the part of applicants.



- 7.3 The DI recommends that the Political and Administrative arms of the St. Ann Municipal Corporation familiarise themselves with the policies relating to conflicts of interest in an effort to mitigate against any adverse impact that the mishandling of such conflicts may have on the Corporation and to prevent any similar reoccurrence of the execrable handling of the matter at hand.
- 7.4 The DI recommends that the SAMC retroactively refer Mrs. Shirlyn Campbell-Bells application for a space in the Ocho Rios Transportation Center to the Ministry of Local Government and Community Development for the consideration of the Honorable Minister.
- 7.5 The DI further recommends that the St. Ann Municipal Corporation ensures full compliance with their Standard Operating Procedures, particularly their "*System Documentation Commercial Services Operations Market and Transportation Centre*" concerning the user fee structure for markets and transportation centres managed by the Corporation to prevent any further loss of revenue necessary for the sustenance of self-financing entities. Steps should also be taken to prevent the erection of unauthorised structures on Corporation property as well as other forms of unauthorised use of said property.
- 7.6 Additionally, the DI recommends that the deliberations of the Committee meetings of the SAMC be fully and accurately recorded, both in writing and digitally and properly stored for audit purposes, among other things. The DI's recommendation is premised on the fact that the digital recordings



of the concerned Committee's meetings ended prematurely and the Minutes of the meetings did not capture the deliberations. Further, the DI recommends that it be noted in the Minutes, whenever a member of a committee departs the meeting. This is essential in order to establish precise timelines of who was present when certain decisions, discussions or votes are made.

- 7.7 The DI further recommends that the St. Ann Municipal Corporation consider whether individual accountability measures are warranted in respect of the specific officers whose actions contributed to the irregularities identified in this report – including the recommendation of conditional approval for a structure roughly six and a half times the standard permitted footprint without a building plan on file, the issuance of a written communication that conveyed final approval before the applicable approval process had been completed, and the sustained failure to collect or pursue the applicable user fees – in addition to the systemic and procedural reforms recommended above.
- 7.8 The DI would ordinarily refer this matter to the Director of Public Prosecutions (DPP), however, given the ruling of the DPP in a previous investigation of a similar nature, conducted by the DI, concerning breaches of the **Building Act, 2018**, the DI recommends that this report be referred to the SAMC for appropriate and necessary action, in keeping with the DPP's prior ruling. In a ruling by the DPP dated January 10, 2024, *inter alia*, the following was indicated:

“
...”



RULING

2. It is the considered view of the Office of the Director of Public Prosecutions (ODPP) that:

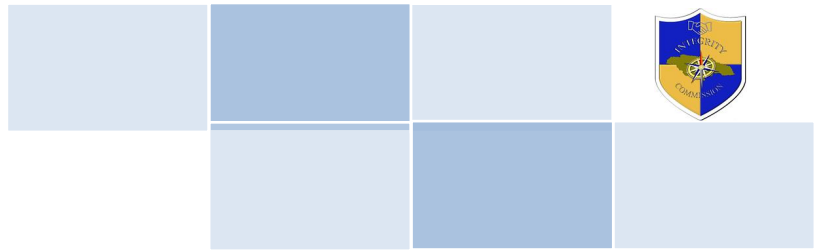
- b. the matter be referred to the Kingston and St. Andrew Municipal Corporation (KSAMC) to conduct an administrative review in accordance with the provisions of the Building Act. Consequent upon the result of this administrative review, it would be a matter purely within the remit of the KSAMC to decide whether an invitation is to be issued to the Jamaica Constabulary Force (JCF) to conduct an investigation into possible breaches of the said Building Act.

14. Section 78 would oblige the KSAMC to spearhead the investigative process and make a determination whether they will follow up on the fruits of the investigation such that they are further mobilized to initiate prosecution in what would be a viable case. If they take the view that they are not minded to issue a fixed penalty notice, they may then invite the JCF to assist them in the administration of their investigative functions and place the matter before the court so the ingredients of the offence can be proved to the requisite standard.

15. It would therefore be open to the KSAMC and they alone, depending on the result of their administrative review, to initiate criminal proceedings or activate the fixed penalty regime in accordance with section 78 of the Building Act.

...”

The DI notes that the SAMC has the option to levy pecuniary fines on Mrs. Shirlyn Campbell-Bell for breaching section 17 (1) (a) of the **Building Act, 2018**, where Mrs. Campbell-Bell constructed a commercial building in the Ocho Rios Transportation Center without the requisite Building Permit issued by the SAMC, pursuant to section 78 (2) of the **Building Act, 2018**, which provides as follows:



“Where a Local Authority finds that a person has committed an offence in relation to its area of jurisdiction and to which this section applies, the Local Authority may give that person the prescribed notice in writing offering the opportunity of the discharge of liability to conviction for that offence by payment to the Local Authority, within the period and in the manner specified in the notice, of the prescribed fixed penalty.”

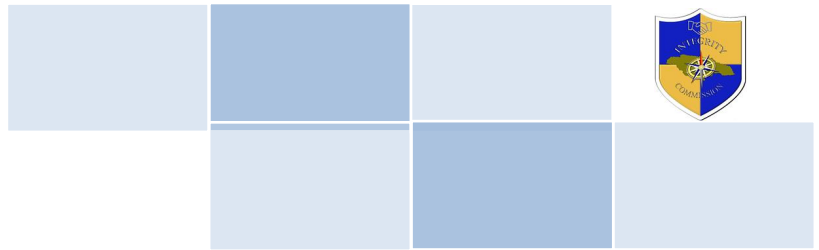
The DI recommends that, if not yet done, the SAMC consider exploring this available option.

Recommendations to the Chairman of the St. Ann Municipal Corporation and the Permanent Secretary, Ministry of Local Government and Community Development

7.9 In light of the DI's findings and conclusions concerning Mr. Bell's conduct, it is recommended that the Chairman of the St. Ann Municipal Corporation consider the following actions:

1. **Formal Reprimand**

That Councillor Bell be formally reprimanded for failing to withdraw and recuse himself from the Commercial Services Committee's consideration of an application submitted by his wife, notwithstanding his personal interest in the matter, and for knowingly allowing procedural irregularities to occur despite being aware of the correct process.



2. **Mandatory Ethics and Conflict of Interest Training**

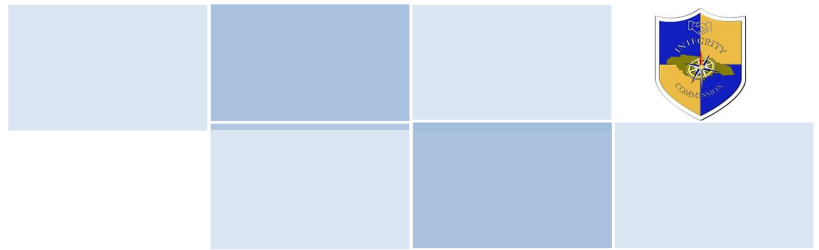
That Councillor Bell, together with all members of the Commercial Services Committee, be required to undergo mandatory refresher training on:

- a) Conflict of interest obligations;
- b) ethical responsibilities of elected officials;
- c) recusal procedures;
- d) governance standards; and
- e) the collective duty of members to safeguard the integrity of Committee proceedings.

3. **Strengthening Procedural Safeguards**

That the Corporation strengthen its procedural safeguards by requiring:

- a) mandatory written disclosure of conflicts of interest;
- b) formal recording of recusals and withdrawals from deliberations;
- c) guidance from the Committee Secretary or Legal Officer whenever a conflict arises; and
- d) confirmation by the presiding Chairman that all conflict procedures have been satisfied before consideration of any matter proceeds.



4. **Issuance of Governance Advisory**

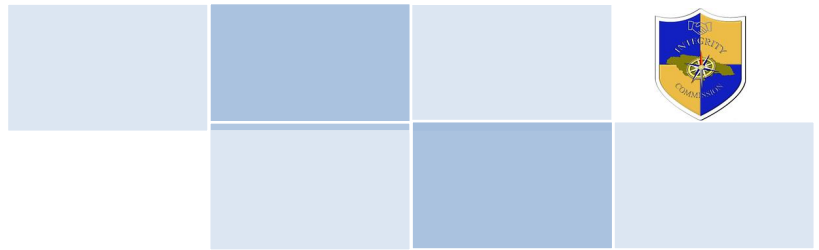
That a formal advisory be circulated to all Councillors emphasising that members cannot evade ethical responsibility by remaining silent where they are aware of procedural breaches, particularly in matters in which they have a personal or familial interest.

5. **Disciplinary Consideration**

That the Chairman consider whether the seriousness of the breach, given the personal nature of the interest involved and the Councillor's admitted knowledge of the proper procedure, warrants referral for further disciplinary review under the applicable governance or disciplinary framework of the Corporation.

These recommendations are made to reinforce the principles of transparency, accountability, and public trust that are essential to the lawful and ethical functioning of the Municipal Corporation.

- 7.10 The DI recommends that the Corporation take the necessary steps to assess, calculate and recover all outstanding fees due and payable, in relation to the operation of Mrs. Shirlyn Campbell-Bell's business (gaming lounge) in the Ocho Rios Transportation Centre since "about the 3rd or 4th of May 2023". The DI further recommends that steps be taken to enforce compliance of the relevant policies and laws in respect of Mrs. Shirlyn Campbell-Bell who, for all intents and purposes, is an unauthorised occupant of Corporation property.



Recommendation to the Office of the Prime Minister and the Ministry of Justice and Constitutional Affairs

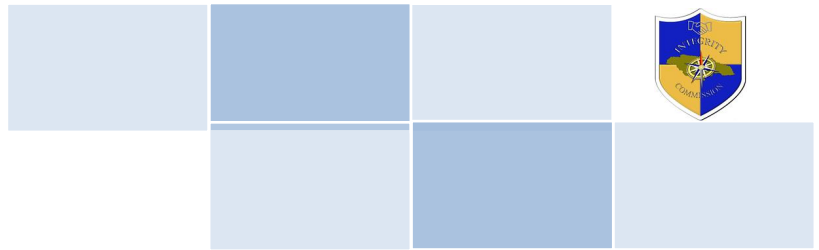
7.11 In fine, it is recommended that the body of local anti-corruption legislation be expanded to include the criminalization of acts and/or omissions which constitute the willful and/or negligent non-disclosure of a conflict of interest. It is further recommended that this legislation be applicable to public servants operating at all levels of government, as well as elected and appointed public officials.

This recommendation is made against the background of the significant adverse impact of conflicts of interest, which has the capacity to undermine legitimate decision-making, compromise the development and application of policy, distort the rule of law and affect the allocation of public resources, thereby encouraging corruption.

The DI notes the inclusion of similar provisions in now repealed Regulations 36 and 40 of the **Contractor General Act Public Sector Procurement Regulations, 2008**.

Regulation 36, Public Sector Procurement Regulations, 2008

“36—(1) It is the duty of any public officer directly or indirectly involved with the procurement process and particularly in the preparation of bidding documents, evaluation, contract negotiations and contract management and payments to—



- (a) *declare to the head of his entity or chairman of the entity's procurement committee any potential conflict of interest in relation to a proposed Government contract;*
- (b) *declare to the head or chairman, any relationship with a bidder, supplier, contractor or consultant and refrain from taking part in either the decision making process or the implementation of any prospective Government contract where such a relationship exists.*

(2) Every personal relationship shall be disclosed in writing or, if in a meeting orally and then minuted..."

Regulation 40, Public Sector Procurement Regulations, 2008

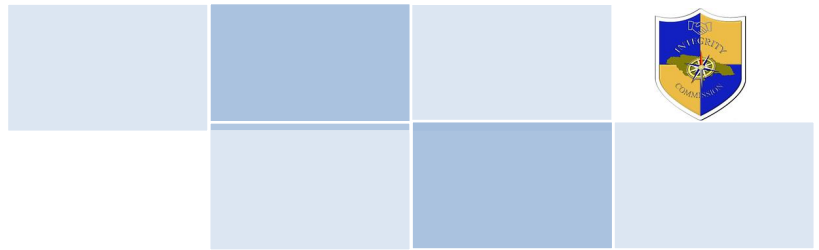
"40. A person who—

- (a) contravenes these Regulations; or*
- (b) aids, abets or otherwise knowingly facilitates or is an accessory to the contravention of these Regulations, commit an offence and is liable, on summary conviction in a Resident Magistrate's Court...."*

A handwritten signature in blue ink, appearing to read 'K. Stephenson'.

Kevon A. Stephenson, J.P
Director of Investigation

July 17, 2026
date

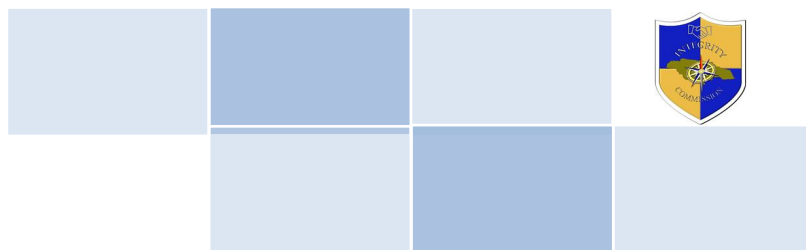


Appendices

Appendix 1

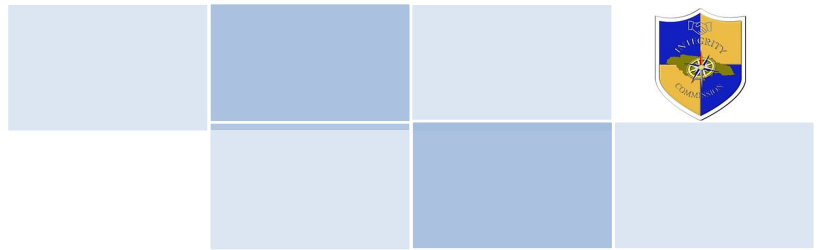
The table gives a detailed account of members of the Commercial Services Committee and the administrative staff of the SAMC concerning the Ocho Rios Transportation Centre

Name of Councillor	Date of Statement	Councillors Account
Dalas Dickenson	May 17, 2024	I vaguely remember the discussions at that meeting. I do however remember that an application for a container to be placed at the Ocho Rios Transportation Centre. At the time the application was presented to the committee I wasn't aware of who the applicant was because of the name that was on the application. The name that was used on the application was Ms Shirlyn Campbell. I later became aware that the applicant was the wife of Councillor Ian Bell. While on the tour of the Ocho Rios Transportation Centre I saw a container. It was later highlighted that this was the container that the applicant, Ms Shirlyn Campbell, had applied for a space to install. While on the tour a particular councillor turned up. The name of this councillor was Mr Ian Bell. He said that this is the container that his wife had applied for the space to



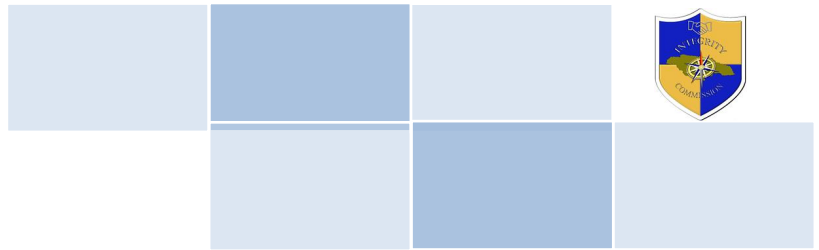
		install. I did not say anything further. When I visited the Transportation Centre on the tour, the container I saw had been installed and was ready for business but there was no business activity going on. I further learnt that Ms Campbell application was approved; however, there were drawbacks because certain procedures were not followed by the applicant. I am aware that there were procedures that were not followed by the applicants but I cannot speak to those procedures.³⁹
Lydia Richards	May 21, 2024	As it relates to an application to erect a container in the Ocho Rios Transportation Centre I cannot recall if I was a part of the discussions before it was erected but I recall there was some discussions about it. I cannot recall the name of the applicant but I know it was Mr Ian Bell's wife. Mr Ian Bell is the Councillor for the Beecher Town Division of the St Ann Municipal Corporation. During my tenure on the Commercial Services Committee I can recall only one other time when someone had applied to erect a container elsewhere in the parish; however, no permission was granted. To the best of my knowledge the application of Mr Ian

³⁹ Witness Statement of Mr Dalas Dickenson, Councillor, St Ann Municipal Corporation, dated May 17, 2024, p2



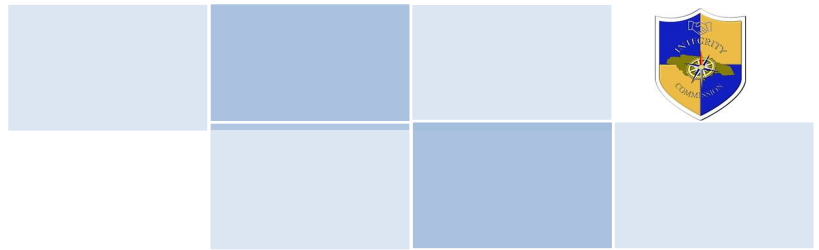
		Bell's wife was discussed at other committee meetings. 40
Winston Brown	May 21, 2024	I can recall that an application was made for the use of a section of the Ocho Rios Transportation Centre in order to erect a 40 feet container in the space. The application was presented at the Commercial Services Committee Meeting. I did not know who the applicant was when the application was raised at the meeting for the first time. The application was recommended to the Trust and Estate Committee who should have recommended the application to the Finance Committee for approval. The Trust and Estate Committee, rather than recommending the application to the Finance Committee for approval, approved the application themselves. I can recall that at another meeting a letter dispatched to Ms Shirlyn Campbell was read. The letter indicated that she needed a building permit to erect the container at the Transportation Centre. Councillor Bell raised the issue that his wife took a loan to facilitate the venture and the Municipal Corporation is delaying the completion of the process. Councillor Bell was asked to recuse himself from the said meeting. This meeting however, was held after the container had

⁴⁰ Witness Statement of Mrs Lydia Richards, Councillor (Ret'd), St Ann Municipal Corporation, dated May 21, 2024, p1, p2

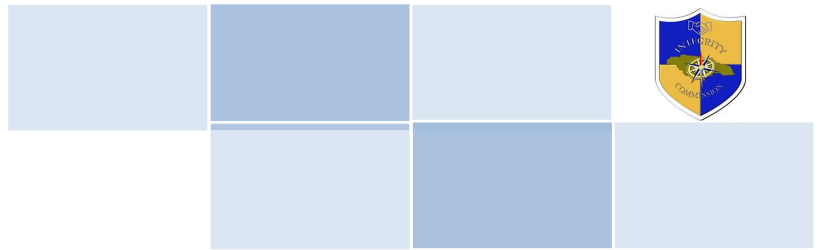


		been placed at the Transport Centre and was being retrofitted. It was Mrs Brown-Cunningham who highlighted that the process undertaken to grant approval for Shirlyn Campbell was incorrect. ⁴¹
Sydney Stewart	May 21, 2024	As it pertains to the erection of the container in the Ocho Rios Transport Centre, I was aware that it came to the Committee as an agenda item for discussion; however, I left during the course of the meeting to include when that item came up for discussion. For this meeting I cannot recall the Councillors who were present. At the time of the application I did not know who the applicant was, I was not a part of that discussion for that agenda item. However, I became aware after the adjournment of the Commercial Services Committee Meeting concerning the discussion in relation to the application for the container. I became aware of the identity of the applicant by Mrs. Jennifer Brown-Cunningham, Chief Executive Officer (CEO), St. Ann Municipal Corporation, that the applicant is the wife of Councillor Ian Bell. This was after the Commercial Services Committee Meeting. In the discussion with the CEO, she mentioned that additional information was necessary and so we needed to speak with Mr. Bell

⁴¹ Witness Statement of Mr Winston Brown, Councillor, St Ann Municipal Corporation, dated May 21, 2024, p1-p3

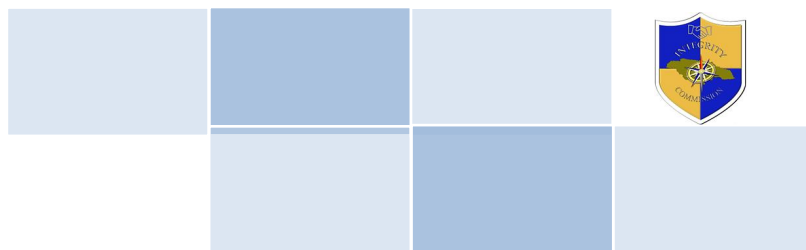


		and so we called him in for a meeting and indicated that the fact that the applicant is his wife, he needed to declare an interest in the project, if any. During the course of this meeting held with Mr. Ian Bell, Mrs. Brown-Cunningham and myself, I indicated that as a member of the Committee he had to declare and disassociate himself from the application and the project. To my recollection, initially, there was some resistance from Mr. Bell however, after a long discussion he agreed to write the letter disclosing his interest and affiliation with the applicant. He agreed. Ultimately, after seeking external advice he decided not to declare his affiliation or relationship with the applicant because it was not necessary. Subsequently, another meeting was held with Mr. Ian Bell, Mrs. Brown- Cunningham, Ian Bell's wife (applicant) and myself, the CEO was in charge of this meeting and gave instructions, this meeting was not the usual scheduled meetings. The instructions given included the fact that Mr. Bell did not go about the process the right way because Mr. Bell should have declared in writing that the applicant was his wife and in doing so permission should have been sought outside of the Municipal Corporation by the CEO.
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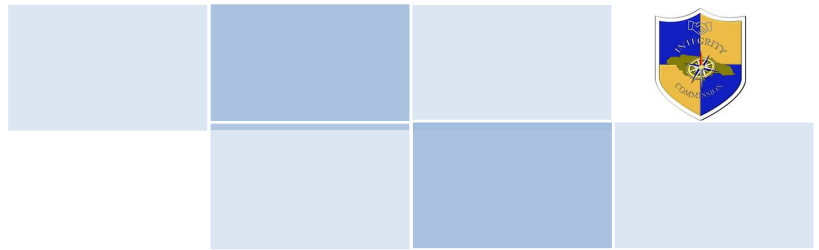
		Having discussed the application here at the Municipal Corporation something should have been sent off to the Ministry of Local Government and Community Development that Mr. Bell's wife (applicant) was seeking permission to do business with the Municipal Corporation. ⁴²
Genevor Gordon-Bailey	May 22, 2024	The Commercial Services Committee is the final stage where a recommendation is made by the committee which goes to the Finance Committee to be ratified. As it relates to whether I am aware of an application for a space in the Ocho Rios Transport Centre to erect a 40ft container, I am not aware of an application for same. I don't recall being a part of the discussion to put a container at the Ocho Rios Transportation Centre. I can recall some months ago I heard by the way that an application was sent to the Corporation for a 40ft container to be erected in the Ocho Rios Transportation Centre and it was erected. I can recall hearing about it when there was a discussion regarding how much money that should be paid for the space then I was told it was a container. I found out who the applicant was when the application went to the desk of the Chief Executive

⁴² Witness Statement of Mr Winston Brown, Councillor (Ret'd), St Ann Municipal Corporation, dated May 17, 2024, p1-p3



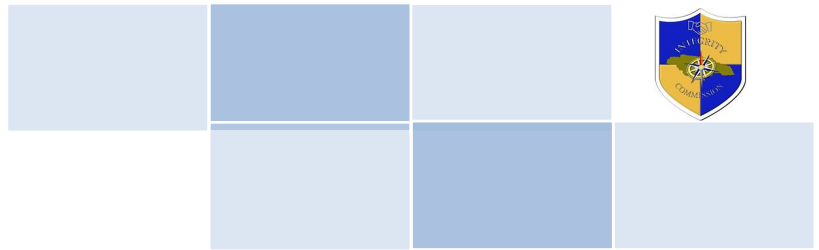
		Officer (CEO) of the St Ann Municipal Corporation who raised concerns as to what was there and why was there a container in the transportation centre. I also heard other Councillors with similar concerns in a setting when it became discourse in the room and some councillors were accused of fighting against the applicant. It was at that point I found out that the applicant was a Ms Campbell. I later found that Ms Campbell was the wife of the Councillor for the Beecher Town Division of the St Ann Municipal Corporation. The councillor I am referring to is Mr Ian Bell. I wish to note here that Mr Bell was a member of the Commercial Services Committee at the time when his wife's application was made to erect a 40ft container in the Ocho Rios Transportation Centre. Approval was given based on the name used on the application. Based on the name, Shirlyn Campbell, used on the application it was not possible to immediately make the connection or affiliation with any member of the Council. ⁴³
Ian Isaacs	May 29, 2024	As it relates to the application from an applicant to erect a container in the Ocho Rios Transportation Centre, I do not remember which meeting it was but I do recall that I was a part of the meeting where the

⁴³ Witness Statement of Mrs Genevor Gordon-Bailey, Councillor, St Ann Municipal Corporation, dated May 22, 2024, p2



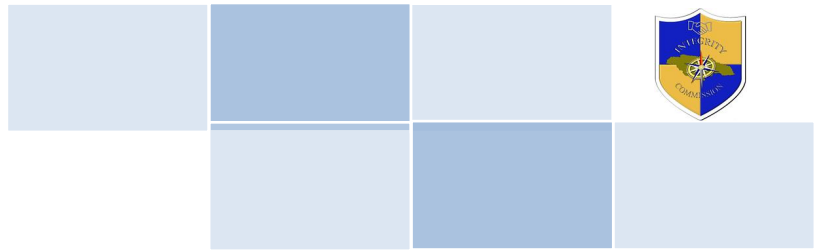
		application was presented. I can recall that the application came before the committee initially but it was deliberated on at the second meeting it was presented. As it relates to the affiliation and or relationship with the applicant and any member of the St Ann Municipal Corporation, the applicant used her maiden name in her application, however, I cannot recall the name of the applicant. During the committee meeting, the councillor who is related to the applicant declared that the applicant was his wife. I did not know the name of the applicant prior to the meeting. The councillor I am referring to is Mr Ian Bell who is the Councillor for the Beecher Town Division of the St Ann Municipal Corporation. I recall at the meeting that someone enquired about the applicant when the Councillor, Mr Ian Bell, said it was his wife's application. After Mr Ian Bell made the verbal declaration that the applicant was his wife, he did not leave or recuse himself from the meeting.⁴⁴
Rohan Davidson	June 3, 2024	In response to whether I had any knowledge of an application for a space to erect a container in the

⁴⁴ Witness Statement of Mr Ian Isaacs, Councillor, St Ann Municipal Corporation, dated May 29, 2024, p2



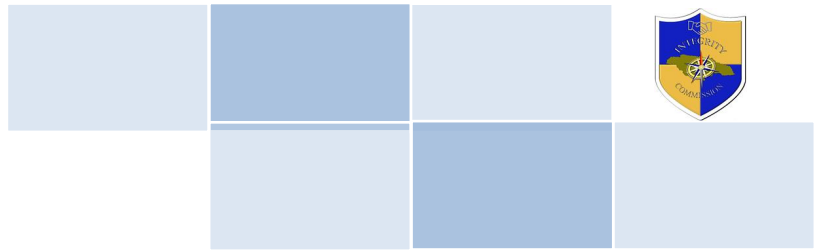
		Ocho Rios Transportation Centre, I can recall that a lady by the name of Campbell made an application but I do not remember what the first name was at the time. Prior to the application from the lady by the name of Campbell I did not know who the person was. I can recall at a meeting after the application was first mentioned, that Council Ian Bell mentioned that he was the husband of the applicant. This was the only disclosure that was made by Mr Ian Bell as to his affiliation or relationship with the applicant. As far as my memory serves me, I can remember he was a part of the meeting but not a part of the discussions concerning his wife's application for a space to erect a container in the Ocho Rios Transportation Centre. ⁴⁵
Kim Brown Lawrence	June 3, 2024	I became aware of an approval for a space in the Ocho Rios Transportation Centre to erect a container in November or December 2023. I also became aware of who the applicant was. The applicant is Mrs Bell, but I am not sure of her first name. In about March or April this year (2024) Mr Ian Bell, Councillor of the Beecher Town Division, accused the Chief Executive Officer,

⁴⁵ Witness Statement of Mr Rohan Davidson, Councillor, St Ann Municipal Corporation, dated June 3, 2024, p1, p2



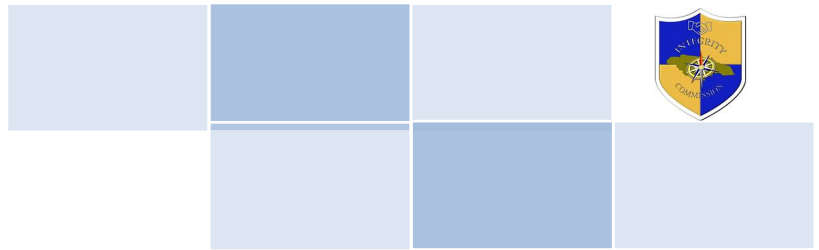
		Mrs Jennifer Brown-Cunningham of the St Ann Municipal Corporation for reporting his wife, Mrs Bell, to Integrity Commission. ⁴⁶
Carlton Ricketts	June 7, 2024	As it relates to the application for a space in the Ocho Rios Transportation Centre to erect a container, from time to time, there would be loads of applications for various entities who wish to rent spaces that they may see on-site and from persons who also wish to erect on the Centre. Yes, I am aware of an application that was made for a space in the Ocho Rios Transportation Centre to erect a container by Shirlyn Campbell. I was present in the Commercial Services Committee meetings when the deliberation regarding this particular application was discussed. I know I recall it's Campbell. I do not personally know this individual, but I can recall the name Campbell. I cannot recall the exact time in which this application was made. I know it was not this year, because of the elections, so it could have been last year. I do not recall much about this application specifically. The matter came to us, and like any other application, I had no objection in declaring that I had

⁴⁶ Witness Statement of Mrs Kim Brown Lawrence, Councillor, St Ann Municipal Corporation, dated June 3, 2024, p2

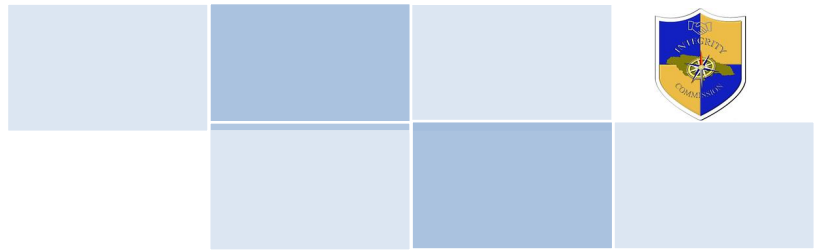


		'no objection' in regards to this person erecting a container in the Ocho Rios Transportation. When we heard the name in the meeting, we, the Councillors present, asked questions regarding the identity of the person who is applying, and in that meeting, Councillor Ian Bell, Beecher Town Division, made it known that Shirlyn Campbell, the applicant, is his wife. To the best of my knowledge, no one else made any disclosure regarding the applicant. After Councillor Ian Bell made the disclosure that the applicant is his wife, he was present in the meeting throughout the deliberations regarding the referenced application, but he did not offer any further comments regarding the matter. Councillor Bell did not recuse himself from the meeting, after having made the declaration.⁴⁷
Cardell Wickham	June 12, 2024	As it relates to the application for a space in the Ocho Rios Transportation Centre to erect a container, I was present in the Commercial Services Committee Meeting where this application was read. As far as I can recall, it was approved the same day it came to the Commercial Services Committee Meeting. Depending on the nature of an application for use of any commercial entity operated by the St Ann

⁴⁷ Witness Statement of Mr Carlton Ricketts, Councillor, St Ann Municipal Corporation, dated June 7, 2024

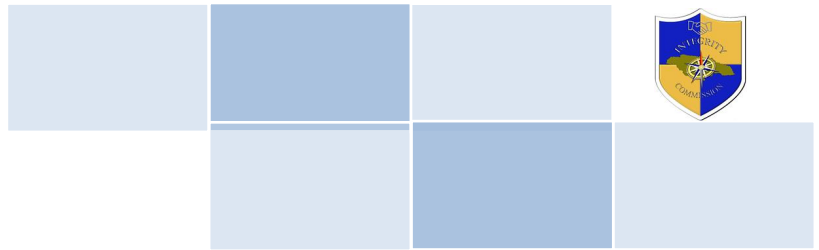


		Municipal Corporation, it is not the norm for approval to be given at the first meeting. As far as I can recall when the application was read, I heard that it had to do with one of us, meaning one of the councillor. As it relates to the application for the container, someone in the meeting had some sort of interest. As far as I can recall, Ian Bell, Councillor for the Beecher Town Division, who was a member of the Commercial Services Committee and was present at the meeting where the application to place a container in the Ocho Rios Transportation Centre was read, made an utterance in the meeting about it which seem as if he knew who the applicant was. He also gave justification (made a case) that it was just a container that will be used for some form of snacks shop. Based on the utterances made by Councillor Ian Bell, I believe it influenced the decision of the committee to approve the application. I recall that his name wasn't on the application but he was aware of it and had some sort of interest. I recall that the committee at the time of the utterance made by Councillor Ian Bell, it was not known whether the applicant was related or affiliated with any member of the Commercial Services Committee. The application wasn't voted on, but based on the feedback of the
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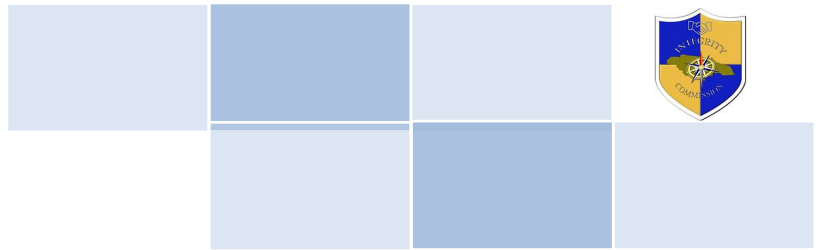


		members, it appeared that it would get the nod of approval. As far as I can recall, this is the first time that an application of this nature was brought to the committee. As it relates to whether anyone in attendance at the meeting made any disclosure regarding their affiliation or relation to the applicant, no, nobody made any disclosure about their relationship or affiliation to the applicant. Also, no one in attendance asked to be excused from the Commercial Services Committee Meeting where the application was being read. Mr Bell is a senior Councillor and should have known better that he should not be in the meeting when the application was being read if he had an interest. At the time when approval was given for the applicant to place a forty-foot container on the property of the Ocho Rios Transportation Centre. I later became aware that the applicant is the wife of Mr Ian Bell.⁴⁸
Paul McFarlane	June 19, 2024	As it relates to the application for a space in the Ocho Rios Transportation Centre to erect a container, yes, I

⁴⁸ Witness Statement of Mr Cardell Wickham, Councillor, St Ann Municipal Corporation, dated June 12, 2024, p2

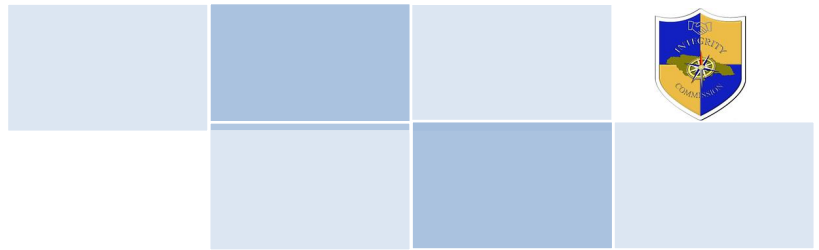


		can relate to one that is a part of heated discussions here in the Corporation. I remember one where a mother leased a space with a container, she had passed, but I think that they had removed that one. There is this one that has been ongoing from last year, 2023, regarding Councillor Ian Bell's wife. When the application came up before the Commercial Services Committee, it was read and Mr Ian Bell indicated that the applicant was his wife. I recall the chairman told Mr Ian Bell that if that is the case, the applicant being his wife, he should not say anything on it. By that I mean he (Councillor Ian Bell) should not participate in the discussions about the application. I do not recall who was the Chairman of the meeting. I do recall, however, that while Mr Bell did not participate in any further discussions regarding his wife's application, he did not leave the meeting. I recall that the chairman of the Committee did not asked Mr Ian Bell to recuse himself from the meeting. The Committee deliberated and the application was approved. I do not believe that Mr Ian Bell's presence in the meeting impacted the decisions of the
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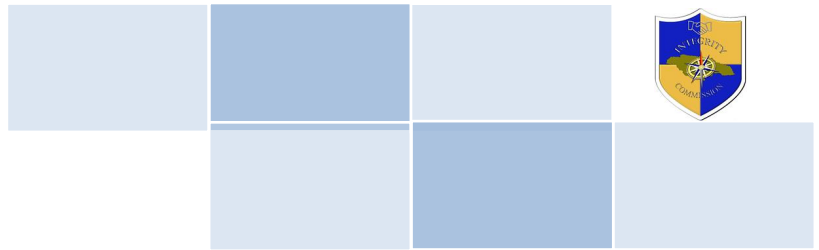


		Commercial Services Committee to approve his wife's application ⁴⁹
Michael Belnavis	June 24, 2024	In regards to an application that was made for a 40 feet container to be erected in the Centre. A lady, whose name I do not recall, applied and it came before the Committee for approval for monthly fee. It came to the Committee twice, once for approval for the container to be erected and secondly for approval of a monthly fee. This was sometime in the year 2023. In relation to this particular application, I am not certain, but I found out later through overhearing other conversations, that the applicant is the wife of Councillor Bell. This came to my knowledge long after the application came before the Committee for approval. Councillor Ian Bell was present in the two (2) Commercial Services Committee meetings when the deliberations were being undertaken in relation to the application made for the erection of a 40 feet container in the Transportation centre and the consideration for a monthly fee payment. I recall that

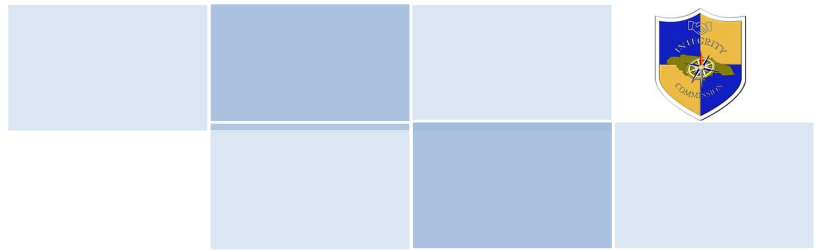
⁴⁹ Witness Statement of Mr Paul McFarlane, Councillor, St Ann Municipal Corporation, dated June 19, 2024, p2



		Councillor Bell was vocal in the meeting surrounding the deliberations on the monthly fee/price. There was some back and forth regarding that amount. I do not believe the agreed price was a very big amount, it was small compared to renting a commercial space in town, but I do not recall the figure, I believe the Minutes could give you information on that figure. After Councillor Bell spoke out regarding the price/monthly fee, the price was reduced but you can check the Minutes to confirm this. I do not recall any form of disclosure being made in the Commercial Services Committee, regarding any Councillor being affiliated with the applicant. I recall that the applicant's last name was not even Bell so I was not even aware until long after the deliberations. I do not recall anyone leaving the room or recusing themselves from the Commercial Services Committee meeting for this particular application. Councillor Ian Bell did not make any disclosure regarding his affiliation/association with the applicant in the Commercial Services Committee meeting. Councillor Ian Bell did not recuse himself from the meeting during the deliberations. When the application came before the Commercial Services
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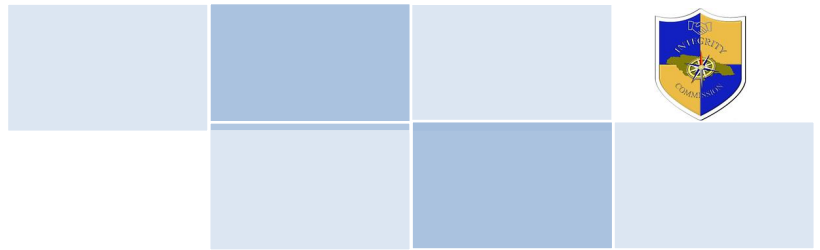


		Committee, it did not say that the space was being rented for a bar. It is afterwards that we realize that it was a bar in operation. If it was a bar that was on the application, we would not have approved it because the spaces are for commercial activities. As it relates to approval for building/erecting of any structure in the Transportation Centre, anything that is being built must be firstly approved by the St. Ann Municipal Corporation. I believe that the 40 feet container that was approved regarding this application for Councillor Bell's wife, is the largest structure that has been built in the Transportation Centre. Just to note, there is no price precedence for monthly fee for this type of structure as there was no other structure of this magnitude so the price would be after deliberation for an estimated amount. In relation to the erection/building of the container, a building plan or some drawing would need to be provided and an explanation as to what the structure will be used for. The plan would be submitted to the Roads and Works department for their approval, prior to same coming before the Commercial Services Committee meeting for approval. I am not aware of any drawings/plans submitted for this particular
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		application regarding the erection of a 40 feet container in the Transportation Centre. ⁵⁰
Polyanna Myers, Supervisor (Acting) Ocho Rios Transportation Centre, St Ann Municipal Corporation	August 7, 2024	As it relates to my knowledge of a container that was erected in the Ocho Rios Transport Centre, I don't know much about it. I came there and saw it. When I tek up duty on the 8th of May 2023, I came and saw some men working on it. No one never really seh anything to me like seh for example, a John container or anything. So, I don't know who owns it. I know it is open and I see it operating up to Monday, August 5, 2024. When I seh it is operating I see it open, I see persons going in and out. I have never collected any fees from the owners and operators of this container that was erected in the Ocho Rios Transportation Centre. I have never gotten any directives from my supervisor to collect any fees from the owners and occupiers of the container and I did not enquire why I should not collect from the owners and occupiers of the container. While I have never been inside the container, I know it is a gaming lounge. I know this because there is a sign

⁵⁰ Witness Statement of Mr Michael Belnavis, Councillor, St Ann Municipal Corporation, dated June 24, 2024



		on the building which displays the words 'Gaming Lounge' and I see people entering and leaving daily. ⁵¹
Lasonya Williams, Secretary, St Ann Municipal Corporation	August 7, 2024	I can recall a meeting of the Commercial Services Committee where an application concerning the erection of a container in the Ocho Rios Transportation Centre was discussed. The meeting was early last year 2023, but I do not remember the exact date. I remember that the application was not on the meeting agenda. What I mean is that the application was not scheduled to be brought to the meeting. It was brought to the meeting as a supplemental. A supplemental is any document that is not on the meeting agenda and is brought to the meeting. I recall that the name of the applicant was Ms Shirlyn Campbell. The application was brought to meeting by Councillor Ian Bell who was a member of the committee at the time. ⁵²

⁵¹ Witness statement of Mrs Polyanna Myers, Supervisor (Acting) Ocho Rios Transportation Centre, St Ann Municipal Corporation

⁵² Witness Statement of Lasonya Williams, Secretary, St Ann Municipal Corporation, dated August 7, 2024

Appendix 2



Frontal view of the concerned construction seen from the left.



View of the concerned construction seen from the rear.



Frontal view of the concerned construction seen from the right.



Inside view of the concerned construction.