



Special Report of Investigation

Concerning the Circumstances which Led to the Approval and Issuance of Prescribed Licences and Permits by the Ministry of Labour and Social Security, for the Construction, Renovation and Operation of the Moon Palace Jamaica Grande Hotel

**Integrity Commission
October 2021**



This Publication until tabled in Parliament shall be confidential.

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

“(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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INTEGRITY COMMISSION Concerning the Circumstances which Led to the Approval and Issuance of Prescribed Licences and Permits by the Ministry of Labour and Social Security, for the Construction, Renovation and Operation of the Moon Palace Jamaica Grande Hotel

May 2021



Table of Contents

Summary of Investigation	4
1.6 Summary of Key Findings.....	6
Chapter 1 – Background.....	9
Initiation of Investigation.....	9
Jurisdiction	9
Individual(s) Pertinent to the Investigation	11
The Investigation	12
Chapter 2 – Terms of Reference	13
Chapter 3 –Evidence, Findings and Discussion.....	15
<i>Requirements for the Granting of Work Permits and Exemptions in Relation to the Foreign Nationals and Commonwealth Citizens (Employment) Act (1964)</i>	<i>15</i>
<i>The Role of the Minister of Labour and Social Security in the Granting of Work Permits and Exemptions.....</i>	<i>18</i>
<i>Work Permits Granted by the Ministry of Labour and Social Security in Relation to the Moon Palace Jamaica Grande Hotel Project</i>	<i>23</i>
Work Permits Granted For the Period August 24 to December 12, 2014	23
Work Permits Granted for the period January 6, 2015 to February 3, 2015 (with the exception of 19 permits which were granted on February 2, 2015)	29
Circumstances which led to the Issuance of Additional Work Permits to Mexican Nationals to be Employed as Construction Finishers	31
Concerns regarding the Application Forms that were Submitted by Operadora Palace Resorts requesting the Grant of Work Permits.....	34
<i>Request made to the Ministry of Labour and Social Security, by Operadora Palace Resorts, for the Granting of Additional Work Permits.....</i>	<i>36</i>
Chapter 4 – Conclusion.....	41
Chapter 5 – Recommendations	43
Appendices.....	45



Summary of Investigation

1.1 The then Office of the Contractor General (OCG), acting pursuant to Sections 15 and 16 of the Contractor-General Act, on March 16, 2015, commenced an investigation into the circumstances which led to the approval and issuance of prescribed licences and permits by the Ministry of Labour and Social Security, for the construction, renovation and operation of the Moon Palace Jamaica Grande Hotel.

1.2 The then OCG's decision to undertake the referenced investigation was prompted by two (2) Jamaica Observer media articles dated March 4, 2015 and March 10, 2015, respectively.

1.3 The media article dated March 4, 2015¹, outlined, *inter alia*, the following allegations:

(a) That the contracts of the sub-contractors for the construction, renovation and operation of the Moon Palace Jamaica Grande Hotel were suspended as ICON, the lead contractor, met with Mexican officials who were overseeing the renovation of the hotel;

(b) That hundreds of foreigners were expected to arrive in the island on Sunday, to get 'the work done'; and

¹ Jamaica Observer media article dated March 04, 2015, and titled "Workers at Moon Palace Jamaica Grande protest again".



(c) A concern regarding the availability of 'good trade persons in Jamaica' and the recruitment of foreigners, from mainly Mexico, to complete the project.

1.4 The other media article which was dated March 10, 2015², outline, *inter alia*, that:

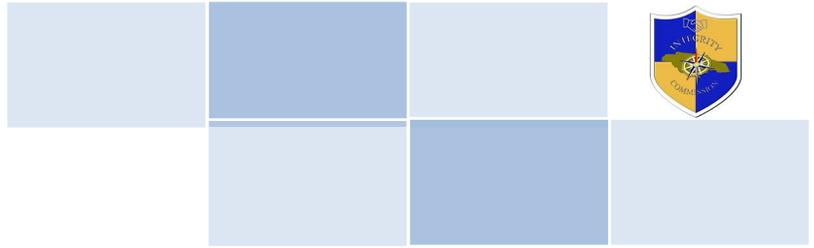
(a) Opposition spokesman on Labour, Rudyard Spencer alleged that the Government granted 300 work permits to Mexicans, and questioned the rationale for the decisions, given that skills are available locally to manage the project;

(b) In response, Labour Minister, Derrick Kellier explained that the increased employment of Mexican construction workers on the hotel site was in an effort to meet the April deadline for the opening of the hotel; and

(c) Construction workers at the Moon Palace Jamaica Grande withdrew their services Wednesday, claiming that the management of the hotel was planning to replace them with foreigners.

1.5 Having regard to the referenced media article report, the investigation sought to determine, *inter alia*, whether the process(es)/procedure(s) undertaken by the Ministry of Labour and Social Security, for the approval

² Jamaica Observer article dated March 10, 2015, and titled, "Opposition questions Gov't granting of 300 work permits to Mexicans"



and issuance of work permits to Mexican nationals, were devoid of impropriety and/or irregularities.

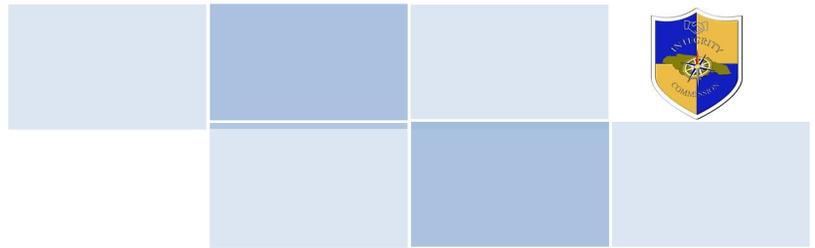
1.6 Summary of Key Findings

1.6.1 The Foreign Nationals and Commonwealth Citizens (Employment) Act, governs the issuance of work permits and work permit exemptions to Foreign Nationals.

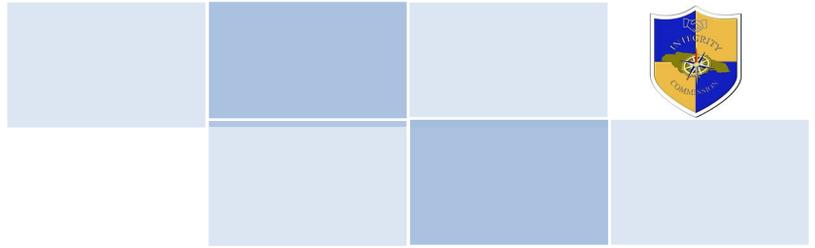
1.6.2 The Foreign Nationals and Commonwealth Citizens (Employment) Act does not outline the necessary supporting documentation that are required to accompany the submission of work permit applications.

1.6.3 In accordance with the Foreign Nationals and Commonwealth Citizens (Employment) Act, the Ministry of Labour and Social Security established internal administrative guidelines which outline the eligibility requirements for work permits, exemptions and the documents required for the processing of work permit applications.

1.6.4 The Ministry of Labour and Social Security's established internal administrative guidelines requires the prospective foreign employees (applicant) and employers to submit documentation and details regarding the applicant's biographical information, work experience and proof of qualification, in an effort to aid the Minister in determining the legitimacy of the applications.



- 1.6.5 On February 1, 2015, nineteen (19) Mexican Nationals who arrived in Jamaica, without the requisite documentation to work on the Moon Palace project, were denied entry.
- 1.6.6 On February 2, 2015, work permit application for the nineteen (19) individuals who had arrived from Mexico on February 1, 2015, were submitted to the Ministry of Labour and Social Security for processing.
- 1.6.7 On February 2, 2015, nineteen (19) work permits were granted to Mexican Nationals, who submitted applications on the said day.
- 1.6.8 The process for the issuance of the nineteen (19) work permits was accelerated by the Ministry of Labour and Social Security, as a result of them being denied entry into Jamaica, on February 1, 2015.
- 1.6.9 During the period August, 2014 to February, 2015, the Ministry of Labour and Social Security processed One Hundred and Fifty-five (155) work permit applications for Mexican Nationals, to be employed with Operadora Palace Resorts (Ja.) limited.
- 1.6.10 In relation to the number of work permit applications that were submitted to the Ministry by Operadora Palace Resorts, and the work permits that were actually granted by the Ministry, Mrs. Colette Roberts-Risden, Permanent Secretary, advised the Director of Investigation (DI) that the Ministry was unable to locate all the requisite documentation.



1.6.11 Parts I and II of the application forms which were submitted for the One Hundred and Fifty-five (155) construction finishers were incomplete and they were not accompanied by required documentation such as the respective work experience details, proof of qualification, employer details, resumes and police records.

1.6.12 With regard to the inability of the Ministry of Labour and Social Security to provide certain work permit documentation for scrutiny by the Integrity Commission, the Ministry of Labour and Social Security advised that owing to flooding caused by heavy rainfall in the first quarter of 2020, there was damage to files which were stored in the Work Permit Unit, and which 'possibly' included the referenced work permit applications for the Moon Palace construction and renovation project, for the captioned period.



Chapter 1 – Background

2.1 This chapter outlines the background information concerning the investigation.

Initiation of Investigation

2.1.1 On March 16, 2015, the then Office of the Contractor-General (OCG), acting pursuant to the provisions contained in Sections 15 and 16 of the Contractor-General Act, initiated an investigation into the circumstances which led to the approval and issuance of prescribed licences and permits by the Ministry of Labour and Social Security, for the construction, renovation and operation of the Moon Palace Jamaica Grande Hotel.

Jurisdiction

2.1.2 The then OCG relied on Sections 4 and 15 of the then applicable Contractor-General Act, which enabled the Office to investigate the referenced matter. Accordingly, Section 4 (1) of the Contractor-General Act required, *inter alia*, that the circumstances surrounding such grant, issue, suspension or revocation of any prescribed licence, do not involve impropriety or irregularity.

2.1.3 Section 2 of the Contractor-General Act provides the following interpretations:



Government Contract – *“includes any licence, permit or other concession or authority issued by a public body or agreement entered into by a public body for the carrying out of building or other works or for the supply of any goods or services”*;

A Public Body means –

“... ”

- (a) *a Ministry, department or agency of government;*
- (b) *a statutory body or authority;*

...”

2.1.4 With respect to the continuation of the investigation by the Director of Investigation, Section 63 of the Integrity Commission Act (2017) provides, *inter alia*, that:

“... ”

- 1) *Notwithstanding the amendment or repeal of an Act under this Part, as from the appointed day any legal proceedings or claims pending immediately before the appointed day, which before the appointed day, were brought, continued or enforced by or against any of the respective Commissions, shall be brought, continued or enforced by or against the Commission in the same manner as they would have been brought, continued or enforced before the appointed day.*

- 2) *The Commission established under this Act may-*



(a) commence or assume any investigation, swear any information or commence or conduct any prosecution in respect of an offence committed, or alleged to be committed before the appointed day under a provision of either of the amended Acts that has been amended or repealed by this Act, or under the repealed Act, and each such amended or repealed provision and the repealed Act shall be deemed to remain in full force and effect, for the purposes of any such investigation, information and prosecution as it had been immediately before the appointed day; or

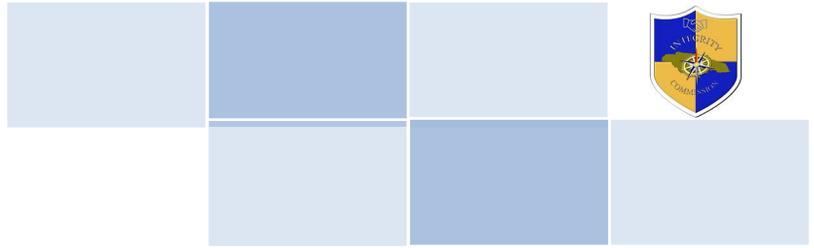
(b) continue or do any act, thing or investigation which was pending before the appointed day.

...”

Individual(s) Pertinent to the Investigation

2.1.5 The following individual was required to provide a sworn written response to the formal Requisition directed to her by the then OCG:

- i) Mrs. Colette Roberts-Risden, Permanent Secretary, Ministry of Labour and Social Security.



The Investigation

2.1.6 During the course of the investigation, a detailed review of the sworn written response and supporting documentation was conducted.

2.1.7 The then OCG conducted unannounced visits to:

- (a) The Ministry of Labour and Social Security located at 1F North Street, on March 16, 18 and 19, 2015; and
- (b) The St. Ann Municipal Corporation located on Main Street, St. Ann's Bay on March 16, 2015.

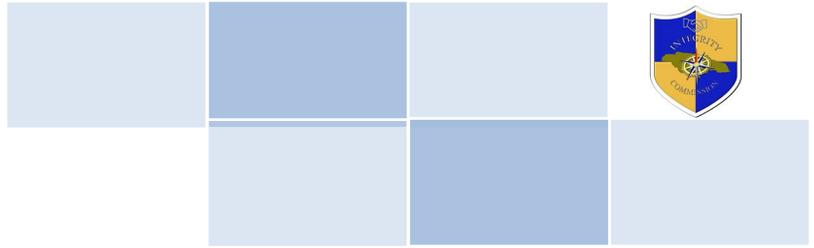
2.1.8 Following the visit to both locations, a comprehensive review of the documents that were sequestered, was conducted.

2.1.9 A review of the applicable Government of Jamaica Handbook of Public Sector Procurement Procedures (2014), the Foreign Nationals and Commonwealth Citizenship Act and Regulations (1964), and other relevant Regulations and Policies, was also undertaken.



Chapter 2 – Terms of Reference

- 3.1 This chapter sets out the scope of the investigation and the issues that were explored.
- 3.2 The then OCG's Investigation into the subject matter sought primarily to ascertain, *inter alia*, the following:
- 3.2.1 The circumstances which led to the approval and issuance of work permits, by the Ministry of Labour and Social Security, to Mexican nationals, for the construction, renovation and operation of the Moon Palace Jamaica Grande Hotel;
 - 3.2.2 Whether the process utilized by the Ministry for the granting of work permits to the Mexican nationals, was based on merit;
 - 3.2.3 Whether the process(es)/procedure(s) undertaken by the Ministry of Labour and Social Security, for the issuance of work permits to the Mexican nationals, were devoid of irregularities and/or impropriety;
 - 3.2.4 Whether there were any breaches of the Foreign Nationals and Commonwealth Citizens (Employment) Act (1964), on the part of the Operadora Palace Resorts (Ja.) Limited, Ministry of Labour and Social Security or any person(s)/official(s) who were responsible for the approval and issuance of the work permits; and



3.2.5 Whether the process(es) which was/were utilised in the approval and issuance of the work permits to the Mexican nationals, was/were in breach of any other legislation(s) or policy(ies) that govern the granting and issuance of work permits by the Ministry of Labour and Social Security.

3.2.6 To determine whether recommendations ought to be made in respect of any breaches and anti-corruption initiatives identified.



Chapter 3 –Law Evidence, Findings and Discussion

4.0 This chapter sets out the discussion of the findings and the relevant legislation in respect of the investigation.

Requirements for the Granting of Work Permits and Exemptions in Relation to the Foreign Nationals and Commonwealth Citizens (Employment) Act

4.1 Section 2 of the referenced Act defines a “foreign national”, *inter alia*, as follows:

“ ...

“foreign national” means a person who is not -

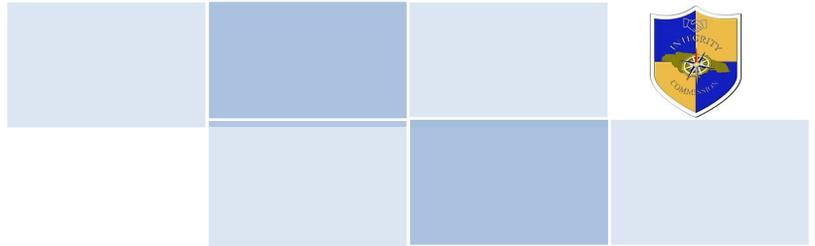
- (a) a citizen of Jamaica;
- (b) a Commonwealth citizen; or
- (c) a CARICOM national;

...”

4.1.1 Section 2 of the Act further defines a “work permit” or “permit”, *inter alia*, as follows:

“ ...

- (a) in relation to a person who is or is about to be employed by another, a permit in writing –



(i) issued under this Act by the Minister to, and in the name of, the employee or person about to be employed; and

(ii) specifying the name of the employer, the place of employment, or both; and

(b) in relation to any other person, a permit in writing issued under this Act by the Minister authorizing such person to engage in an occupation.”³

4.1.2 The statutory requirements for the granting of Work Permits to Foreign Nationals, are detailed, inter alia, as follows:

...

“4. – (1) An application for the grant of a work permit shall be addressed to the Minister, who may in his absolute discretion grant the permit either conditionally or without conditions or may refuse to grant it.

(2) A work permit shall be in such form as the Minister may think fit and different forms of work permit may be issued as respects different classes of persons and as the circumstances require.

...

³ Section 2 of the Foreign Nationals and Commonwealth Citizens (Employment) Act (1964).
INTEGRITY COMMISSION Concerning the Circumstances which Led to the Approval and Issuance of Prescribed Licences and Permits by the Ministry of Labour and Social Security, for the Construction, Renovation and Operation of the Moon Palace Jamaica Grande Hotel



6. – (1) Every work permit shall be kept by the person to whom it is issued, who shall at all times produce the permit to an authorized person or a constable on demand, or within three days after such demand at such police station as may be specified by the person first-mentioned at the time of the demand.”⁴

4.1.3 In April of 2011, the referenced Act was amended to include the granting of a 'work permit exemption'. In this regard, the Act states, *inter alia*, the following:

“ 4A. –(1) Subject to the qualification set out in regulation 5, a person who is a member of a class described in Part III of the Schedule, conducting business in Jamaica on –

(a) a visit not exceeding thirty days;

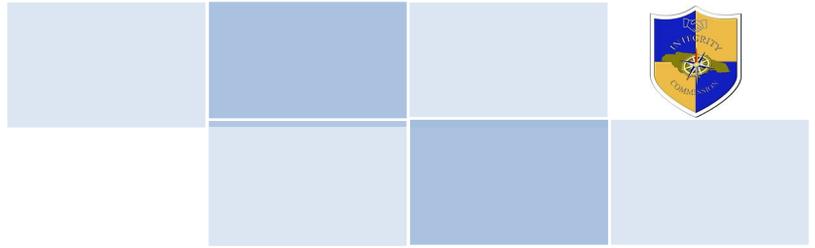
or

(b) more than one visit in any calendar year, not exceeding –

(i) thirty days on each occasion; and

(ii) six months in the aggregate,

⁴ Sections 4(1) and 6(1) of the Foreign Nationals and Commonwealth Citizen (Employment) Act.
INTEGRITY COMMISSION Concerning the Circumstances which Led to the Approval and Issuance of Prescribed Licences and Permits by the Ministry of Labour and Social Security, for the Construction, Renovation and Operation of the Moon Palace Jamaica Grande Hotel



Shall be exempt from the provisions of section 3(1) of the Act and shall not be required to apply for a certificate stating the nature of the exemption.”

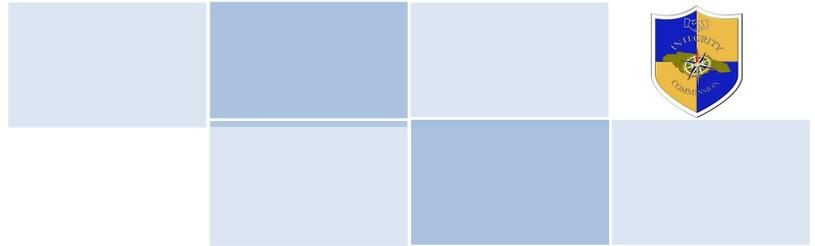
The Role of the Minister of Labour and Social Security in the Granting of Work Permits and Exemptions

4.2 In accordance with the Foreign Nationals and Commonwealth Citizens (Employment) Act, the Minister of Labour and Social Security, holds “*absolute discretion*” in the granting of Work Permits.⁵ Section 10.-(1) of the Act also speaks to the authority of the Minister and states, *inter alia*, the following:

“The Minister may make regulations generally for giving effect to the provisions of this Act, and without prejudice to the generality of the foregoing may make regulations –

- (a) providing for the establishment and maintenance of a register of persons to whom or in respect of whom work permits have been issued;*
- (b) providing for the issue to any person who is exempt from any of the provisions of this Act of a certificate stating the nature of the exemption;*

⁵ Section 4(1) of the Foreign Nationals and Commonwealth Citizen (Employment) Act
INTEGRITY COMMISSION Concerning the Circumstances which Led to the Approval and Issuance of Prescribed Licences and Permits by the Ministry of Labour and Social Security, for the Construction, Renovation and Operation of the Moon Palace Jamaica Grande Hotel



(c) *regulating the issue, amendment or replacement of work permits and for the payment of fees by the persons or any class of persons applying therefor;*

...

(f) *prescribing forms to be used for the purposes of this Act;*
and

(g) *prescribing any other matter or thing which is required to be or may be prescribed under this Act.”⁶*

4.2.1 Notwithstanding the foregoing provisions, the Act does not make any reference to the specific documentation, procedures and protocols that are required for the processing of work permit applications.

4.2.2 In relation to the administrative guidelines regarding the completion of an application form for work permits, Mrs. Colette Roberts-Risden, Permanent Secretary, Ministry of Labour and Social Security, in a response dated April 30, 2015 to an OCG Requisition, indicated, *inter alia*, that in addition to the Act, there are administrative guidelines which govern the Ministry’s operational procedures.⁷

4.2.3 Attached to Mrs. Roberts-Risden’s response were two (2) main documents entitled as *“Instructions For Completing An Application For A Work Permit*

⁶ Section 10.-(1) of the Foreign Nationals and Commonwealth Citizens (Employment) Act (1964)

⁷ Response dated April 30, 2015 from Mrs. Colette Roberts Risden, Permanent Secretary, Ministry of Labour and Social Security.



Or Work Permit Exemption Pursuant To The Provisions Of the Foreign Nationals & Commonwealth Citizen Act (referred to as the “internal administrative guideline” by the Ministry) and the “Ministry of Labour and Social Security Work Permit/Exemption Application Form.”⁸ The internal administrative guidelines outlined the eligibility requirements for work permits, exemptions and the documents required for the processing of the applications.

4.2.4 In particular, the referenced “Ministry of Labour and Social Security Work Permit/Exemption Application Form” highlighted the following required details⁹:

- a) **Part I of the Application** (to be completed by the prospective employee): personal details, biographical details, work experience details.
- b) **Part II of the Application** (to be completed by the prospective employer): employer details, qualification requirements, salary and allowances details, staff composition details.

4.2.5 In addition to ensuring adequate completion of the application forms, the following documentation were also required to commence processing of the applications:

⁸ Response dated April 29, 2015 from Mrs. Colette Roberts-Risden, Permanent Secretary, Ministry of Labour and Social Security.

⁹ Appendix 1- Ministry of Labour and Social Security Work Permit/Exemption Application Form
INTEGRITY COMMISSION Concerning the Circumstances which Led to the Approval and Issuance of Prescribed Licences and Permits by the Ministry of Labour and Social Security, for the Construction, Renovation and Operation of the Moon Palace Jamaica Grande Hotel

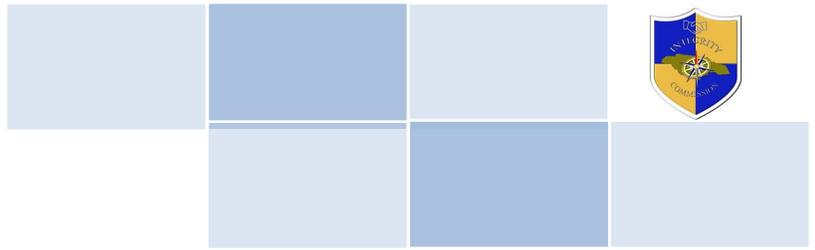


- a) A cover letter written by the local employer setting out clearly, the reasons for making the application, the efforts made to recruit a Jamaican national to undertake the work contemplated and the expected duration of the work to be undertaken by the applicant;
- b) Proof of Qualification;
- c) Resume outlining professional and business experience;
- d) Police Record; and
- e) Proof of business registration.

4.2.6 The then OCG further sought to ascertain specific details surrounding the standard approval process that were established by the Ministry of Labour and Social Security, in relation to the work permit applications.

4.2.7 In relation to the process utilized by the Ministry of Labour and Social Security for work permit applications, Mrs Roberts-Risden, by way of a letter dated April 29, 2015, in response to the then OCG's Requisition, outlined, *inter alia*, as follows:

"Applications are submitted to the Work Permit Department, processed and given to the Minister or his designate for a decision to be taken. If approval is granted the entity that submitted the application would be notified and directed to make payments where applicable. A letter of approval is then prepared. The applicant is directed to present the aforesaid letter, to have his passport endorsed by Passport Immigration and Citizenship Agency (PICA) and to return to [sic] our Offices



and present his endorsed passport and certificate from the PICA. The applicant is then issued his work permit identity card.”¹⁰

¹⁰ Letter dated April 29, 2015 from Mrs. Colette Roberts-Risden, Permanent Secretary, Ministry of Labour and Social Security.



Work Permits Granted by the Ministry of Labour and Social Security in Relation to the Moon Palace Jamaica Grande Hotel Project

Work Permits Granted For the Period August 24 to December 12, 2014

4.3 In relation to the captioned, Mrs. Colette Roberts-Risden, Permanent Secretary, Ministry of Labour and Social Security, in a response dated August 21, 2017, provided several letters which outlined details of the approvals that were granted for work permits issued to Mexican nationals, as early as August 2014, to be employed with Operadora Palace Resort (Ja.) Limited and Barma Construction Limited, in the renovation of the Moon Palace Jamaica Grande Hotel.

4.3.1 The DI is in possession of eight (8) letters, four (4) of which were addressed to Palace Resorts and four (4) to Barma Construction Limited, for the period August 2014 to December 2014. In the referenced letters, the Ministry advised the companies that work permits were approved for a total of forty-two (42) Mexican Nationals.¹¹

4.3.2 The following table details the pertinent information contained in the referenced eight (8) letters:

¹¹ Appendix 2 – Work Permits granted for the period August 2014 to December 2014.



Table 1¹²

	Date of Letter	Individual(s) granted Permit	Work	Work Number	Permit	Period of Work Permit	Position within the Company
1	August 28, 2014	Emmanuel Alejandro Huerta	Islas	1501/2014		18/8/2014-17/8/2016	Financial Controller
2	August 28, 2014	Jesus Gomez Romero		1500/2014		24/8/2014-23/8/2016	Financial Controller
3	October 21, 2014	(1) Pablo F. Corona Suarez (2) Paul A. Zapata Cervera (3) Luis H. Salas Carrillo (4) Juan C. Bautista Quijano (5) Maria E. Contreras Aguilar (6) Rommy A. Castillo Gallegos (7) Julio C. IArgaez Estrada (8) Jose E. Barbosa Martin (9) Cynthia J. Sosa Hernandez		(1) 1934/2014 (2) 1935/2014 (3) 1936/2014 (4) 1937/2014 (5) 1938/2014 (6) 1939/2014 (7) 1940/2014 (8) 1941/2014 (9) 1944/2014		16/10/2014 - 15/04/2015	(1) Construction Manager (2) Projects Coordinator (3) Construction Manager (4) Quantity Surveyor (5) Projects Assistant (6) Quantifier (7) Coordinator (8) Architect (9) General Manager Site Quantifier

¹² Appendix 2 – Work Permits granted for the period August 2014 to December 2014.



4	November 27, 2014	(1)	Miguel Urbano Navarrete	(1)	2209/2014	20/11/2014	(1)	Supervisor	
		(2)	Luis A. Solis Perez	(2)	2210/2014	- 19/02/2015	(2)	Supervisor	
		(3)	Jose L. Evangelista Jimenez	(3)	2211/2014		(3)	Supervisor	
		(4)	Rafael A. Maglioni	(4)	2212/2014		(4)	Supervisor	
		(5)	Alamilla	(5)	2206/2014		(5)	Supervisor	
		(6)	Rigoberto Sanchez Estrada	(6)	2213/2014		(6)	Supervisor	
		(7)	Armando Vega Guerrero	(7)	2215/2014		(7)	Specialist Installation	Marble
		(8)	Erick Lopez Quintana	(8)	2207/2014		(8)	Supervisor	
		(9)	Antonio Ramirez Olivera	(9)	2214/2014		(9)	Supervisor	
		(10)	Victor A. Vega Guerrero	(10)	2217/2014		(10)	Supervisor	
		(11)	Jorge Mendoza Gomez	(11)	2216/2014		(11)	Specialist Installation	Marble
		(12)	Efrain Alvarez Perez	(12)	2208/2014		(12)	Supervisor	
5	December 1, 2014	(1)	Miguel A. Sevilla Garcia	(1)	2188/2014	20/11/2014	(1)	Architect	
		(2)	Abel R. Martinez Ceron	(2)	2189/2014	- 19/05/2015	(2)	Architect	
			Melchor Chable						



(3)	Rodriguez	(3)	2187/2014	(3)	Architect
(4)	Fernando Morales Ramirez	(4)	2186/2014	(4)	Architect
(5)	Jesus I. Lopez Saldana	(5)	2185/2014	(5)	Architect
(6)	Juan M. Alamilla	(6)	2195/2014	(6)	Architect
(7)	Gongora	(7)	2184/2014	(7)	Architect
(8)	Ludwig E. Parra Nungaray	(8)	2196/2014	(8)	Architect
(9)	Marco V. Sanchez Vizcarra	(9)	2190/2014	(9)	Architect
(10)	Andres Marin Rodriguez	(10)	2191/2014	(10)	Architect
(11)	M Elda Bernabe Lomas	(11)	2192/2014	(11)	Architect
(12)	Gabriel A. Caceres Ruiz	(12)	2193/2014	(12)	Architect
(13)	Daniel R. Rayon	(13)	2194/2014	(13)	Architect
(14)	Luis G. Garza Lozano	(14)	2197/2014	(14)	Engineer
(15)	Jose G. Lopez Reyes	(15)	2198/2014	(15)	Architect
(16)	Rogelio Villafana Ramos				



6	December 4, 2014	Luis Garfias Garcia		2254/2014	20/11/2014 -19/2/2015	Supervisor	
7	December 4, 2014	(1)	Hector A. Hernandez Rivera	(1)	2260/2014	27/11/2014 - 26/05/2015	(1) Architect
		(2)	Alejandro Reyes Lopez	(2)	2262/2014		(2) Architect
8	December 12, 2014	Juan Miguel Pech		2002/2014	24/10/2014 -23/4/2015	Engineer	

4.3.3 Additionally, all the letters indicated, *inter alia*, that the individuals who were granted work permits are “required to have a valid visa endorsed in ... passport before entering the Island”.¹³ It was also observed from the letters that, *inter alia*, the applicant:

*“should attend at the Immigration Office, 25 Constant Spring Road, Kingston 10 with this letter and ... passport(s) for endorsement and registration”.*¹⁴

4.3.4 The further referenced letter also stated that the applicants should:

¹³ Letters dated April 29, 2014, August 8, 2014, October 21, 2014, November 27, 2014, and December 1, 4, 12, 2014, from Ministry of Labour and Social Security to Operadora Palace Resort (Ja.) limited.

¹⁴bid.



“then attend at the Ministry, 1F North Street, Kingston and on presentation of ... endorsed passport and Certificate issued by the Immigration Office, ... permit will be delivered ... personally. It should be noted that if the permit is not collected within [thirty (30), sixty (60), ninety (90)] days of the date of this letter, it will be cancelled.”¹⁵

4.3.5 It is instructive to note that for the forty-two (42) Mexican nationals mentioned above, no corresponding work permit application letters or any other documentation from Operadora Palace Resorts (Ja.) Limited and Barma Construction Limited requesting work permits for the named individuals were observed by the DI.

4.3.6 In the foregoing regard, Mrs. Roberts-Risden, in a Statement dated August 19, 2021, indicated, *inter alia*, that:

“Between the period of August 2014 to January 2015 the Ministry received work permit application requests from the Company and Barma Construction Limited. The Ministry is unable to locate copies of the work permit applications and correspondence/supporting documentation submitted to the Ministry from the two entities during this period due to the time which has elapsed since the submission of the documents and the Integrity Commission’s request.”¹⁶

¹⁵Ibid.

¹⁶ Statement dated August 19, 2021 from Mrs. Colette Roberts-Risden, Permanent Secretary, Ministry of Labour and Social Security.



Work Permits Granted for the period January 6, 2015 to February 3, 2015 (with the exception of 19 permits which were granted on February 2, 2015)

4.3.7 Based upon a review of the documents provided by Mrs. Colette Roberts-Risden, Permanent Secretary, Ministry of Labour and Social Security in her response dated August 21, 2017, the Ministry granted ten (10) Work Permits to Mexican Nationals.¹⁷

4.3.8 Similar to the letters which were dispatched in 2014 by the Ministry, the work permit approval letters for the period January 6, 2015 to February 3, 2015, also stipulated that the applicants were to:

- (a) Have a valid visa endorsed in their passport before entering the island;
- (b) Attend at the Immigration Office with the letter from the Ministry and their passport for endorsement and registration;
- (c) After endorsement and registration at the Immigration Office, attend the Ministry with the endorsed passport and certificate issued by the Immigration Office to receive the work permit personally; and
- (d) If the work permit was not collected after a certain amount of days after the date of the letter, it would be cancelled.

¹⁷ Letters dated April 29, 2014, August 8, 2014, October 21, 2014, November 27, 2014, and December 1, 4, 12, 2014, from Ministry of Labour and Social Security to Operadora Palace Resort (Ja.) Limited.



4.3.9 Additionally, as with the previous Work Permits, mentioned above, which were granted in 2014, the DI has seen no corresponding Work Permit Applications for the ten (10) individuals.

4.3.10 The following table details the pertinent information contained in the referenced eight (8) letters:

Table 2

	Date of Letter	Individual/s granted Work Permit	Work Permit Number	Period of Work Permit	Position within the Company
1	January 6, 2015	Martin Evangelista Jimenez	2445/2014	16/12/2014-15/3/2015	Specialist Marble Instillation
2	January 6, 2015	Laura Alcocer Montoya	2448/2014	16/12/2014-15/3/2015	Interior Design
3	January 6, 2015	Gabino Quintero Pina	2446/2014	16/12/2014-15/3/2015	Specialist Marble Instillation
4	January 6, 2015	Victor Quintero Pina	2450/2014	16/12/2014-15/3/2015	Specialist Marble Instillation
5	January 6, 2015	Pablo Cruz Castilla	2447/2014	16/12/2014-15/3/2015	Specialist Marble Instillation
6	January 6, 2015	Eugenio Cabrera Aguilera	2449/2014	16/12/2014-15/6/2015	Civil Engineer
7	February 2, 2015	Marcelo Quintero Martinez	110/2015	29/01/2015-28/04/2015	Specialist Marble Instillation



8	February 3, 2015	(1)	Jorge Mendoza Sanchez	2516/2014	17/12/2014-	(1)	Manager of Sales
		(2)	Paola L. Ramirez Hernandez	2514/2014	16/12/2016	(2)	Quality & Development
		(3)	Lizeeth Cossio Rangel	2515/2014	17/12/14- 16/6/2015	(3)	Quality & Development

Circumstances which Led to the Issuance of Additional Work Permits to Mexican Nationals, to be Employed as Construction Finishers

4.4 In addition to supervisors, managers and architects et al, it was observed that construction finishers were also required for the Moon Palace Jamaica Grande Hotel project. This observation was based on a response dated April 29, 2015, from Mrs. Colette Roberts-Risden, Permanent Secretary, Ministry of Labour and Social Security, in which she indicated, *inter alia*, the following:

“The matter of Moon Palace requiring additional work permits to facilitate Finishers being brought into the island to ensure the timely completion of its construction project was first brought to the Ministry’s attention in the latter part of January, 2015 by Mrs Maureen Denton, Representative from the Growth Agenda Secretariat – Cabinet Office. At that time, a discussion was held with the Director of the Work Permit Department wherein I was advised that Moon Palace required additional workers with skills



not readily available locally to assist with the construction process. The situation was regarded as urgent as the hotel was trying to meet its opening deadline. The Ministry was also contacted by representatives of Jamaica Trade and Invest – Investment Facilitation Services to support the urgent need for the speedy processing of applications in this regard.

On January 30, 2015 Ms Maureen Denton, Cabinet Office, was advised by Ms Lisa-Ann Grant, Director Work Permit, of the application process for work permits and that the company should submit the relevant applications.”¹⁸

4.4.1 Mrs. Roberts-Risden further indicated that she was made aware on February 1, 2015, that nineteen (19) Mexican nationals were denied entry into Jamaica, upon arrival. The individuals, who were identified to be engaged as part of the Moon Palace project, had arrived at a port of entry from Mexico, without the requisite documentation to work.¹⁹

4.4.2 The DI is in possession of a letter dated February 2, 2015, which was addressed to Mrs. Colette Roberts-Risden, Permanent Secretary, Ministry of Labour and Social Security, in which work permit applications for nineteen (19) Mexican nationals were submitted.²⁰

¹⁸ Requisition response from Mrs. Colette Roberts-Risden, Permanent Secretary, Ministry of labour and Social Security, dated April 29, 2015. Response 1.

¹⁹ Ibid.

²⁰ Letter from Palace Resorts dated February 2, 2015, and addressed to Mrs. Colette Roberts-Risden, Permanent Secretary, Ministry of Labour and Social Security, attached to Mrs. Roberts-Risden response dated August 21, 2017.



4.4.3 The letter dated February 2, 2015 further made reference to the work permits request being one of urgency, as there were numerous challenges being faced and a great delay in the target opening dates, as a result of the constant training of new staff and the effect on the quality and progress of the work.²¹

4.4.4 Mrs. Roberts-Risden, in response to the letter of February 2, 2015, requesting the approval of work permit applications for the referenced Mexican Nationals who were denied entry into Jamaica upon arrival, advised that approvals were subsequently granted based on the compelling circumstances advanced by the Company, as well as, the endorsement by JAMPRO and the Growth Agenda Secretariat. In addition, the following factors, *inter alia*, were considered:

“... ”

1. *The challenges faced by the company in completing the project.*
2. *The value of the investment to Jamaica's Tourism product.*
3. *Employment potential for Jamaicans once the project is completed.*

²¹ Ibid.



4. *The fact that the request was supported by the Cabinet Office and JAMPRO...*²²

4.4.5 The DI noted that the referenced listing which contained the nineteen (19) work permit applications was not attached to the above mentioned letter. However, the Ministry's letter dated February 2, 2015, which was addressed to Operadora Palace Resorts (Ja.) Limited, made reference to the granting of work permits to the nineteen (19) Mexican Nationals to be employed with the entity.

Concerns regarding the Application Forms that were Submitted by Operadora Palace Resorts requesting the Grant of Work Permits

4.4.6 At this juncture, the following condition which was contained in the Ministry's letter dated February 2, 2015, addressed to Operadora Palace Resorts (Ja.) Limited, is being highlighted. The applicants were advised, *inter alia*, that they were:

"... required to have valid visas endorsed in their passports before entering the island. Thereafter, they should attend at the Immigration Office, 25 Constant Spring Road, Kingston 10 with this letter and their passports for endorsement and registration. They should then attend at this Ministry, 1F North Street, Kingston and on presentation of their endorsed passports and the Certificates issued by the Immigration Office, their permits will be delivered to

²² Requisition response from Mrs. Colette Roberts-Risden, Permanent Secretary, Ministry of Labour and Social Security, dated April 29, 2015. Question 1.



them personally. It should be noted that if the permits are not collected within thirty (30) days of the date of this letter, they will be cancelled.”²³

4.4.7 Upon an examination of the applications that were processed and approved on February 2, 2015, in relation to the employment of the nineteen (19) Mexican Nationals who arrived in Jamaica on February 1, 2015, it was observed that, Sections 2, 7, 8, 10, 11, 15, 16, 17, 18, 19 and 29, of part one (1) of the work permit application forms were not adequately completed.²⁴

4.4.8 Based on the foregoing, it must be highlighted that the “Instructions for Completing An Application For A Work Permit Or Work Permit Exemption Pursuant To The Provisions Of the Foreign Nationals & Commonwealth Citizens Act” indicate, that “**Failure to correctly complete the form will result in the non-processing of your application.**”²⁵ (DI Emphasis)

4.4.9 Notwithstanding the instruction highlighted above, Mrs. Colette Roberts-Risden, indicated, *inter alia*, that “**An application is deemed complete upon the employer/sponsor affixing their signature to the application form and a request in writing. Since it is the employers’ application on behalf of the prospective employee, applications without the prospective**

²³ Letter from Palace Resorts dated February 2, 2015, and addressed to Mrs. Colette Roberts-Risden, Permanent Secretary, Ministry of Labour and Social Security.

²⁴ Appendix 1 – Work Permit Application Form

²⁵ Instructions For Completing An Application For A Work Permit or Work Permit Exemption Pursuant To The Provisions Of the Foreign National & Commonwealth Citizens Act.



employee's signature are accepted by the Ministry and are deemed complete once the employer/sponsor signature is affixed."²⁶ (DI Emphasis)

4.4.10 Having regard to the foregoing, the DI also observed that part two (2) of the application forms was inadequately completed by the prospective employer, Operadora Palace Resorts.

Request made to the Ministry of Labour and Social Security, by Operadora Palace Resorts, for the Granting of Additional Work Permits

4.4.11 By way of a Palace Resorts letter dated February 5, 2015, addressed to Ministry of Labour and Social Security, the entity requested that work permits be urgently granted for another fifty (50) individuals. The letter made reference to the need for the workers to "correct the errors and complete the finishing of those areas", so as to facilitate the opening of the hotel for March 1, 2015.²⁷

4.4.12 The DI also perused a document which bore the caption, "*LIST OF NAMES – APPROVAL LETTER TO BE ISSUED THURSDAY, FEBRUARY 12, 2015*", which was attached to the abovementioned letter. The referenced document listed the names of seventy-four (74) individuals and was divided into three (3) categories, (1) 50 applicants submitted February 5, 2015, (2) Millet Team (19 applicants), and (3) Moon Palace Team (5 applicants).

²⁶ Response dated April 29, 2015 from Mrs. Colette Roberts-Riden, Permanent Secretary, Ministry of Labour and Social Security, Response No. 14.

²⁷ Letter from Palace Resorts dated February 5, 2015, and addressed to Mrs. Colette Roberts-Riden, Permanent Secretary, Ministry of Labour and Social Security.



4.4.13 It is instructive to also note that the then OCG's review of the mentioned documents only revealed a written request for fifty (50) applicants by Operadora Palace Resort.

4.4.14 Subsequent to the request made by Operadora Palace Resorts, a letter dated February 12, 2015, from the Ministry of Labour and Social Security, was observed, which indicated, *inter alia*, as follows:

*"... I am directed to inform you that Work Permits valid for the period 2015 February 11 to 2015 May 10 have been granted to persons mentioned on the **attached list of seventy four applicants** (Mexican nationals) to be employed with Operadora Palace Resorts (Ja.) Limited as Construction Finishers."*²⁸

4.4.15 Similar to the application forms that were submitted for the nineteen (19) Mexican Nationals, it was observed that Sections 2, 7, 8, 10, 11, 15, 16, 17, 18, 19 and 29, of Part one (1) of the application forms, were not adequately completed by all seventy-four (74) applicants. In addition, part two (2) of the application forms were not adequately completed by the employer, Operadora Palace Resorts.

4.4.16 On February 16 and 25, 2015, Operadora Palace Resorts, wrote to the Ministry, requesting an additional thirty three (33) and nineteen (19) work permits, respectively. The requests for the additional fifty-two (52)

²⁸ Letter dated February 12, 2015, from Ministry of Labour and Social Security and addressed to Operadora Palace Resorts (ja.) Limited.



Construction Finishers were due to the fact that the project was at 85% completion and the requisite experience/expertise was now being required to bring the project to completion.²⁹

4.4.17 Subsequent to the requests that were made for the 52 Construction Finishers, the DI observed a letter from the Ministry to Operadora Palace Resorts (Ja.) Limited, dated February 25, 2015, which granted the approval of sixty-two (62) work permits.³⁰

4.4.18 In relation to the number of work permit applications that were submitted for the Foreign Nationals, and the work permits that were actually granted by the Ministry, Mrs. Colette Roberts-Risden in a response dated August 21, 2017, indicated, *inter alia*, as follows:

"We are unable to locate all lists; however, our records indicate that as at March 16, 2015, one hundred and fifty five (155) applications for work permits were approved..."³¹

4.4.19 By way of a Statement dated August 19, 2021, Mrs. Roberts-Risden also mentioned, *inter alia*, the following details pertaining to the number of additional permits that were granted:

"On three further occasions in February, the Company sent correspondence to the Ministry for the approval of work permits

²⁹ Letters from Palace Resorts dated February 16 & 25, 2015, and addressed to Mrs. Colette Roberts-Risden, Permanent Secretary, Ministry of Labour and Social Security.

³⁰ Letter from the Ministry of Labour and Social Security dated February 15, 2015 and addressed to Operadora Palace Resorts (Ja.) Limited.

³¹ Response dated August 21, 2017 from Mrs. Colette Roberts-Risden, Permanent Secretary, Ministry of Labour and Social Security. Response #4(b).



for additional workers to complete the renovations at the Hotel. These requests were made by letters dated, February 5, 2015 (74 applicants), February 16, 2015 (33 applicants) and February 25, 2015 (19 applicants) respectively. Regarding the letter dated February 5, 2015, it should be noted that while the Company had requested the approval for fifty (50) work permits in the letter, the listing attached to the letter contained the names of seventy-four (74) applicants...”³²

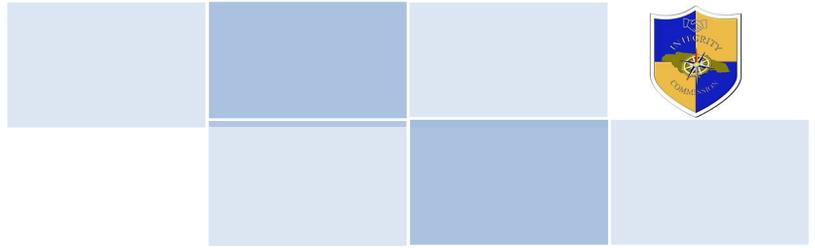
4.4.20 In light of the fact that the Ministry was unable to locate the requisite documentation for the 155 work permit applications that were approved, the DI considers it prudent to note, hereunder, the justification for the submission of supporting documentation as provided by Mrs. Roberts-Risden:

“The submission of documents to support an application for a work permit is to enable the Minister to be satisfied of the legitimacy of the application...”³³

4.4.21 With regard to the absence of the requisite documentation for work permits which were granted for the period 2014 to 2015, the DI highlights from a Statement dated August 19, 2021, provided by Mrs. Colette Roberts-Risden, Permanent Secretary, MLSS, *inter alia*, as follows:

³² Statement dated August 19, 2021 from Mrs. Colette Roberts-Risden, Permanent Secretary, Ministry of Labour and Social Security.

³³ Response dated August 21, 2017, from Mrs. Colette Roberts-Risden, Permanent Secretary, Ministry of Labour and Social Security. Response No. 2.



"I have been informed by the Work Permit Unit at the Ministry that several boxes of files stored in the Unit were damaged by flooding caused by heavy rainfall. Subsequently, on or about the first quarter of 2020 the documents stored in the boxes were shredded/disposed of due to the damage caused by the rainfall. Further, I have been informed that there is 'possibility' that some application forms and/or documentation relating to the granting of work permits for the Moon Palace Renovation project may have been stored with the documents that were disposed of." ³⁴

³⁴Statement dated August 19, 2021 from Mrs. Colette Roberts-Risden, Permanent Secretary, Ministry of Labour and Social Security.



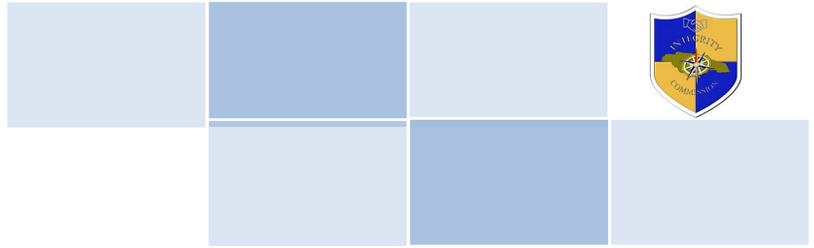
Chapter 4 – Conclusion

5.0 This chapter outlines the conclusions determined by the Director of Investigation.

5.1 Based upon a review of the documents and responses that were received during the course of the investigation, the Director of Investigation has arrived at the following conclusions:

5.1.1 In relation to the grant of work permits to foreign nationals, during the period August, 2014 to February, 2015, for the Moon Palace Jamaica Grand Hotel construction and renovation project, the DI concludes that the Ministry of Labour and Social Security breached Parts I and II of its internal administrative guidelines, which specifically requires an applicant and/or their prospective employer to submit employer and employee details as part of their application prior to being issued with a work permit.

5.1.2 The DI notes the representation made by Mrs. Colette Roberts-Risden, Permanent Secretary in the Ministry of Labour and Social Security, regarding her inability to provide the germane work permit application documentation due to file damage caused by flooding in 2020 and which 'possibly' included records relevant to the Moon Palace construction and renovation project. The DI also notes that the referenced documentation was requested by the then Office of the



Contractor General prior to the '2020 flooding' however, said request was not satisfied. Notwithstanding the aforementioned, the DI concludes that the process which led to the issuance of work permits to Foreign Nationals, during the period August, 2014 to February, 2015, was irregular and lacked transparency. The DI's conclusion is premised upon the failure of the Ministry of Labour and Social Security, to adhere to the established requirements as stipulated in the referenced administrative guidelines, which specifically required the submission of employer and employee details by or on behalf of the applicant, prior to the issuance of a work permit.

5.1.3 Having regard to the absence of the requisite documentation in support of the referenced applications, the DI concludes that the basis upon which the then Minister of Labour and Social Security, Derrick Kellier, satisfied himself of the legitimacy of the applications, remains uncertain and calls into question the legitimacy and credibility of the applications which effected the work permits that were granted to foreign nationals for the period August, 2014 to February, 2015, in respect of the referenced project.



Chapter 5 – Recommendations

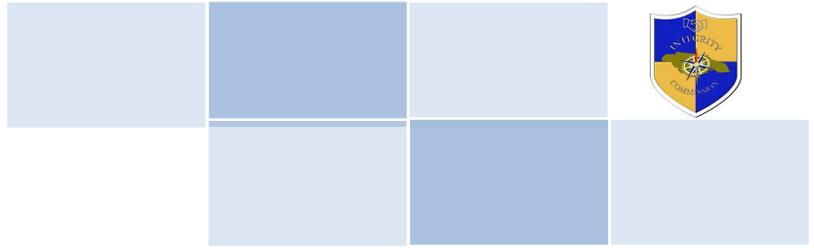
6.0 This chapter outlines the recommendations and corruption prevention initiatives identified by the Director of Investigation based upon the findings and conclusions of this investigation.

Anti-Corruption Recommendations and Initiatives

6.1 The DI recommends that the Permanent Secretary in the Ministry of Labour and Social Security undertakes a review of the Ministry's internal administrative guidelines which governs the processing of work permit applications, with a view to ensuring that the guidelines and policies are effective, fit for purpose and that they are consistent with the Government's broader objectives of accountability and transparency.

6.2 As it relates to the breach of the relevant internal administrative guidelines concerning the processing of work permit applications, on the part of the Ministry of Labour and Social Security, the DI recommends that the Permanent Secretary in the referenced Ministry implements the necessary oversight mechanisms to ensure compliance with the established internal guidelines and/or policies.

The DI's recommendation is premised upon the findings herein and the principle of equity which requires the application of the rule of law to all, in equal measure. Where exceptions are made, as in the present



circumstances wherein the Ministry departed from its internal guidelines; this should be done solely on the basis of pre-stated criteria. It is therefore imperative that the Permanent Secretary in the Ministry ensures that the internal guidelines which govern the issuance of work permits are guided, most scrupulously, by the tenets of transparency, equity and fairness.

6.3 The DI also recommends that the Permanent Secretary in the Ministry makes provision for the safe custody of the Ministry's records so as to prevent, or minimise, the loss of said records due to natural disasters and other events. The DI further recommends that the Permanent Secretary considers, for implementation, the digitisation of the Ministry's historical records as well as its general business processes. This could aid in document security, accountability and overall efficiency in the Ministry's operations. The DI's recommendation is in response to the Permanent Secretary's representation that certain records 'possibly' germane to the work permit application process were destroyed in 2020 due to flooding.

A handwritten signature in blue ink, appearing to read 'K. Stephenson', written over a horizontal line.

Kevon A. Stephenson, J.P
Director of Investigation

October 7, 2021.



Appendices

Appendix 1

Ministry of Labour and Social Security Work Permit/Exemption Application Form

 MINISTRY OF LABOUR AND SOCIAL SECURITY WORK PERMIT/EXEMPTION APPLICATION FORM Foreign Nationals and Commonwealth Citizens Employment Act 1964)			
Please indicate the type of application: <input type="checkbox"/> Work Permit <input type="checkbox"/> Exemption			
PART I TO BE COMPLETED BY PROSPECTIVE EMPLOYEE			
1. First Name	Last Name	Middle Initial	Alias
2. Address (overseas, except in the case of renewal)	3. Gender <input type="checkbox"/> Male <input type="checkbox"/> Female	4. Date of Birth YYYY/MM/DD	5. Country & Place of Birth
6. Nationality	7. Number Of Children/Dependents	8. Marital Status <input type="checkbox"/> Single <input type="checkbox"/> Divorced <input type="checkbox"/> Widowed <input type="checkbox"/> Married <input type="checkbox"/> Separated	
9. TRN	10. Occupation	11. Period for which Permit/Exemption is required YYYY/MM/DD From _____ To _____	
12. Passport Number	13. Passport Expiry Date YYYY/MM/DD	14. Type of Passport (Country Issued)	
15. Qualification – Academic or Professional (Attach Documentary Evidence)		Details on previous (Last) Employer in Jamaica 20. Name of Employer 21. Address of Employer 22. Telephone Number	
16. Work Experience		23. Applicant's Work Permit Number	24. Expiry Date YYYY/MM/DD
17. Skills of Applicant		Details of Husband's/Wife's previous Employment in Jamaica 25. Name of Employer	
18. Husband/Wife's Name		26. Address of Employer	
19. Husband/Wife's Nationality		27. Work Permit Number	28. Expiry Date YYYY/MM/DD
29. I certify to the best of my knowledge and belief, that the above information is correct			
Date _____ YYYY/MM/DD		Applicant's Signature _____	

PART II TO BE COMPLETED BY PROSPECTIVE EMPLOYER							
30. Business Name/Name of Employer/Sponsor			38. TRN				
31a. Business Address (Post Office Box # not acceptable) Street _____ City _____ Parish _____			39. Tax Compliance Certificate (TCC)				
31b. Mailing Address (if different from above)			40. Is your Company registered? Yes _____ No _____	41. Date of Registration YYYY/MM/DD			
32. Telephone Number		33. Fax number		42. The request for Work Permit/Exemption is in relation to: Bi/Multilateral Agreement <input type="checkbox"/> Investment by Overseas Organization <input type="checkbox"/> Other please specify _____			
34. Nature of Business			Steps taken to employ Jamaican National				
35. Qualifications Necessary for Job (Details on Attachment)			43. Contacted Employment Service Public <input type="checkbox"/> Private <input type="checkbox"/> None <input type="checkbox"/>				
36. Job Title and Duties to be Performed (Details on Attachment)			44. Internal Recruitment Yes <input type="checkbox"/> No <input type="checkbox"/> 45. By advertisement (Attach Copy) Overseas <input type="checkbox"/> Locally <input type="checkbox"/> 46. Other _____				
37. Email address			47. If no step was taken please state reason (Details on Attachment)				
48. Gross Salary offered Per Annum \$.....			Kindly indicate in Jamaican currency for questions 48 & 49 49. Prerequisites (Allowances) per Annum House \$..... Car \$..... Entertainment &..... Other \$.....				
50. STAFF COMPOSITION	CITIZENSHIP	PROFESSIONAL	CLERKS/SERVICE WORKER	SKILLED WORKERS	PLANT & MACHINE OPERATORS	ELEMENTARY OCCUPATIONS	TOTAL
	JAMAICAN						
	CARICOM						
	COMMONWEALTH						
	FOREIGN						
51. Details of programme (if any) instituted by Employer to train citizens of Jamaica to fill posts now held by persons who are not citizens of Jamaica (Full explanatory memorandum to be attached).							
I certify to the best of my knowledge and belief, that the above information is correct and accept the responsibility for the support and repatriation expenses of the applicant and his family should the need arise.							
Date _____ YYYY/MM/DD				Employer's/Sponsor's Signature _____			

INTEGRITY COMMISSION Concerning the Circumstances which Led to the Approval and Issuance of Prescribed Licences and Permits by the Ministry of Labour and Social Security, for the Construction, Renovation and Operation of the Moon Palace Jamaica Grande Hotel

May 2021



Appendix 2

List of the 19 Mexican Nationals to be employed as Finishing Specialists

Name	Position
Carlos Guillermo Gonzalez Chan	Finishing Specialist
Luis Enrique Hernandez Mendoza	-do-
Hector Jesus Castro Loeza	-do-
Luis Alberto Antonio Quinones	-do-
Jose Lazaro Chen Pech	-do-
Diego Alejandro Madera Herrera	-do-
Jose David Pech Varquez	-do-
Pedro Pablo Maas Martinez	-do-
Christian Enrique Perez Pech	-do-
Sergio Armando Cab Carvajal	-do-
Juan Carlos Chan Euan	-do-
Alfredo Alejandro Esquivel Medina	-do-
Jeronimo Valentin Ek Canul	-do-
Edgar Armando Cano Chan	-do-
Manuel Alejandro Noh Euan	-do-

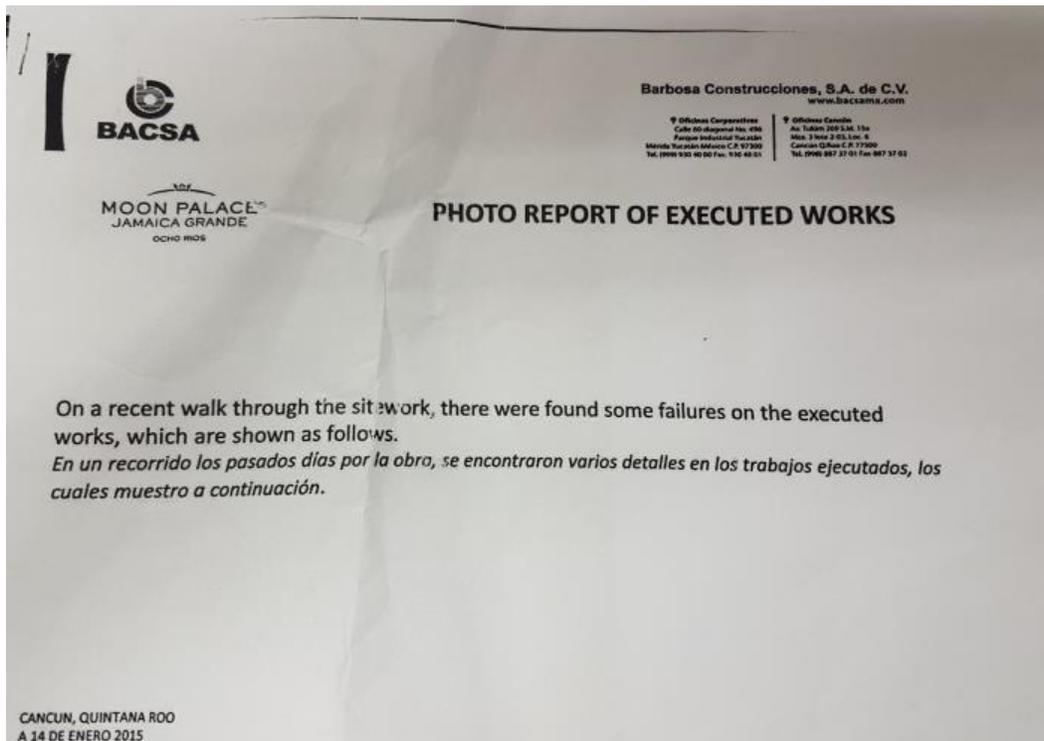


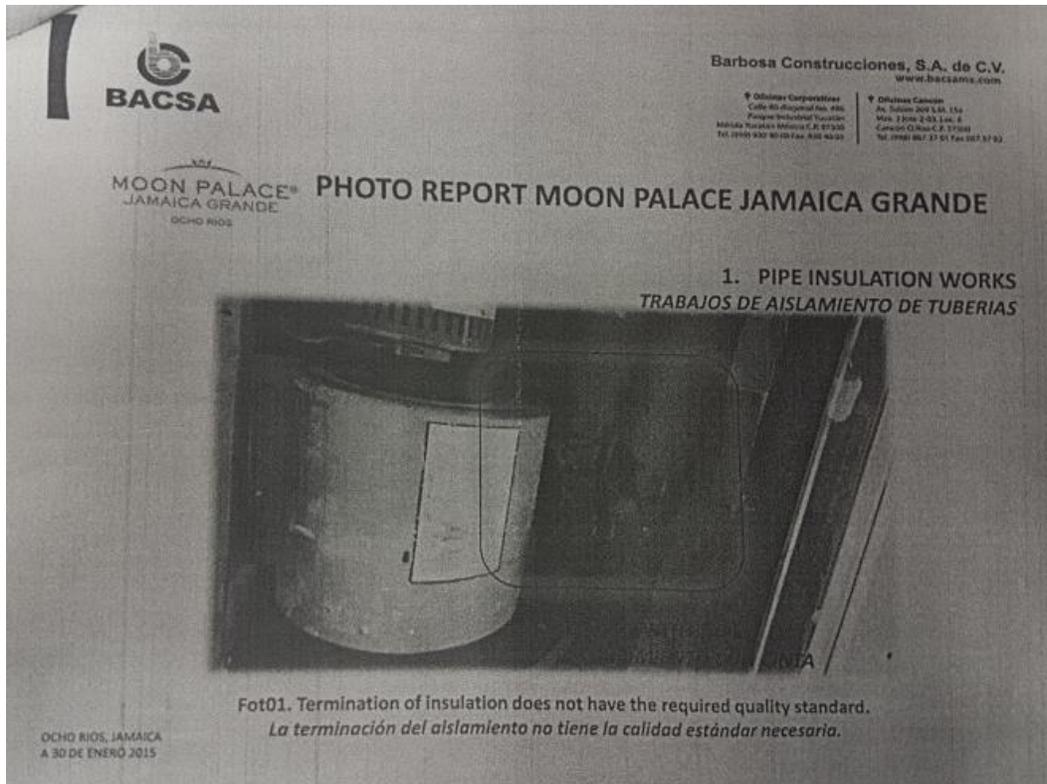
Mario Alberto Clemente Hernandez	-do-
Juan Carlos Mex Cen	-do-
Luis Enrique Matrin Aldana	-do-
Mario Francisco Cardos Solis	-do-

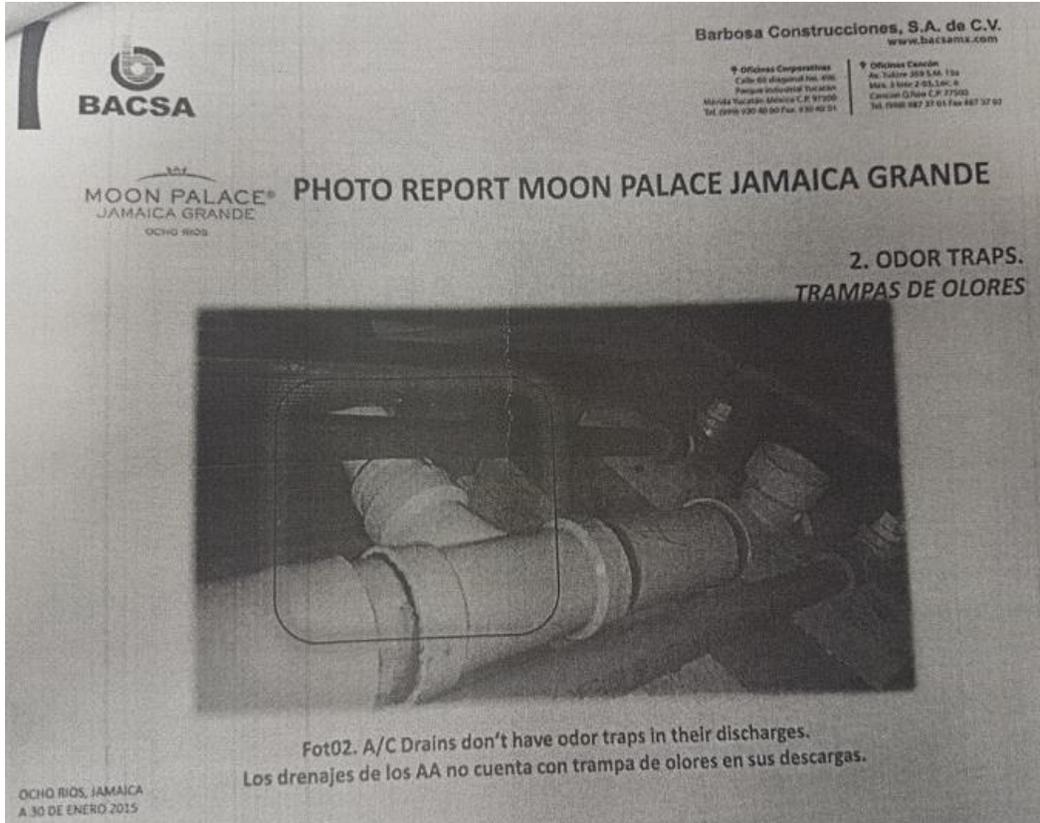
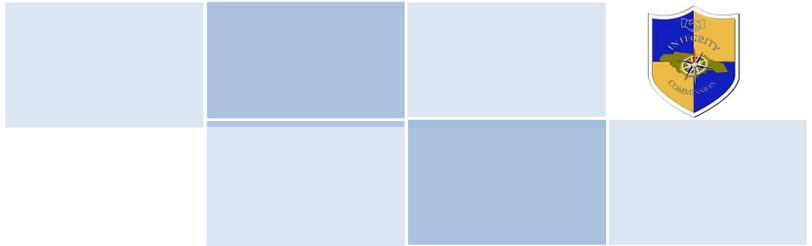


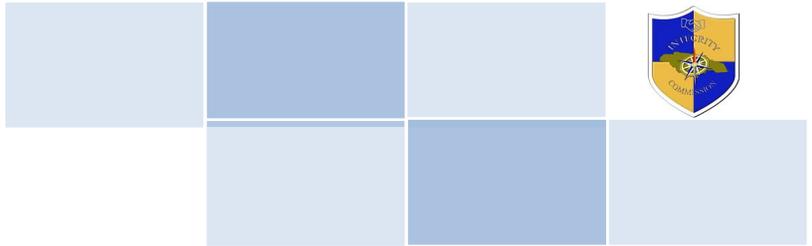
Appendix 3

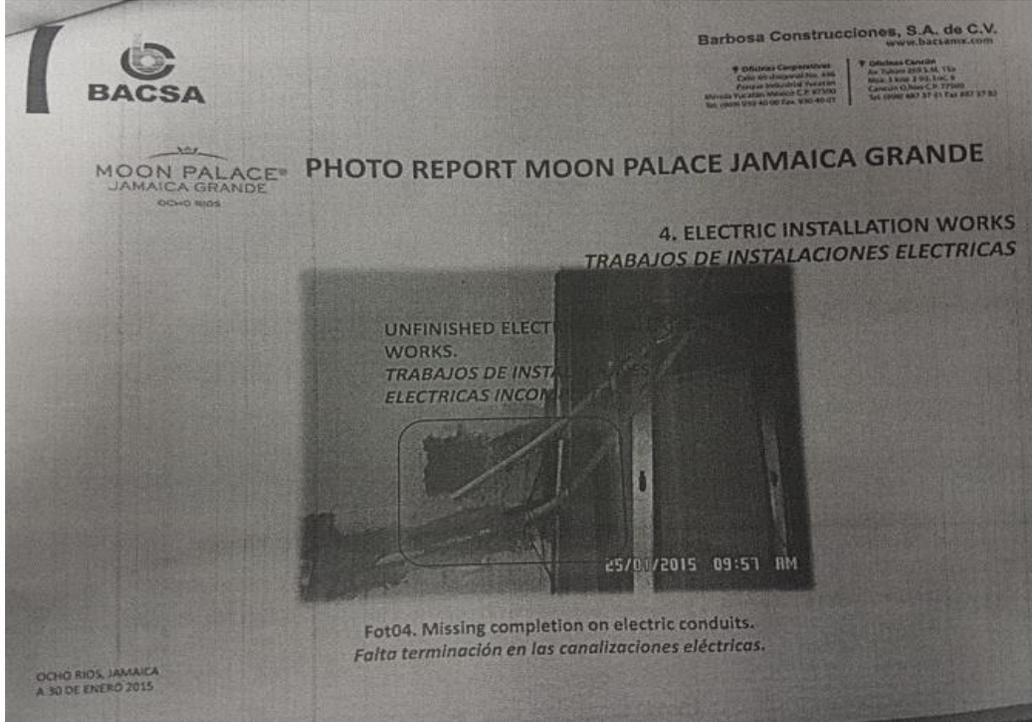
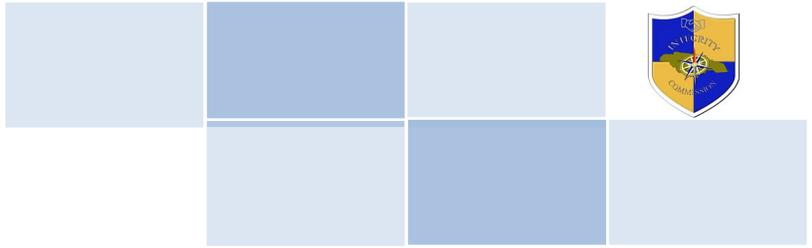
Photographs of Report Prepared by Operadora Detailing Issues

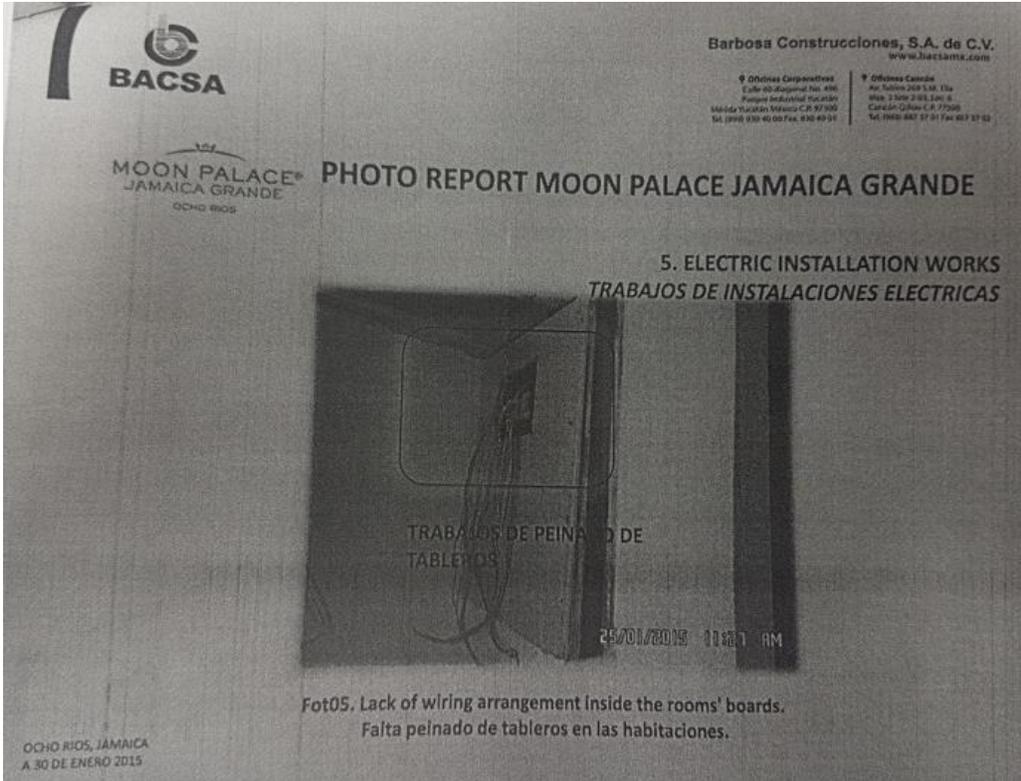


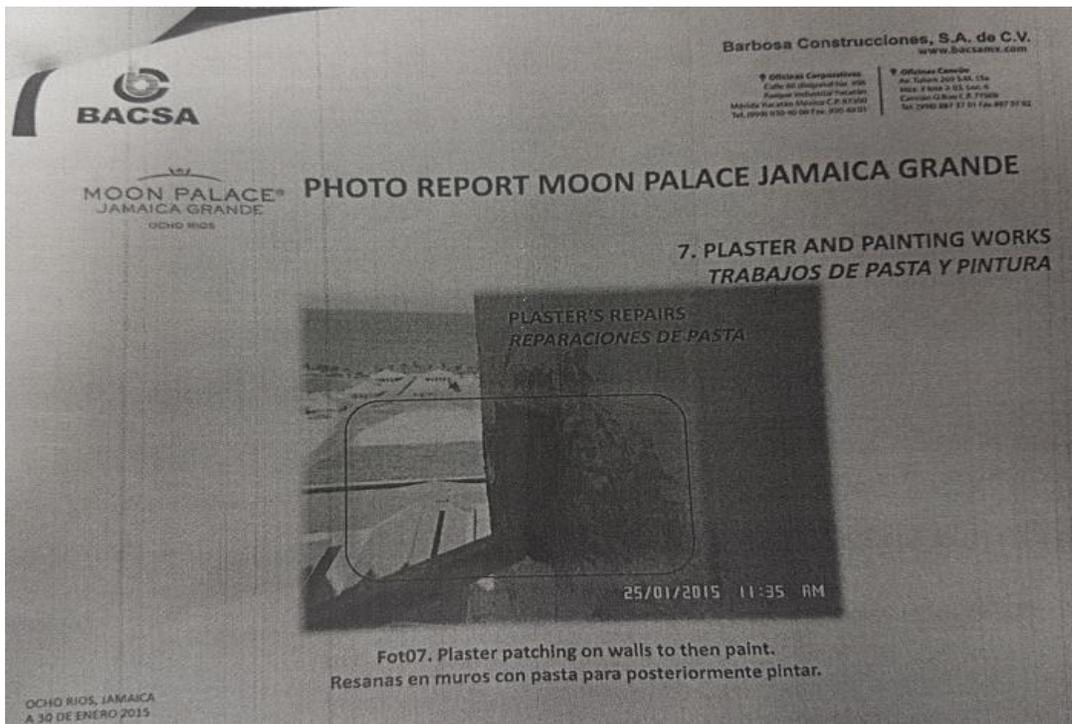
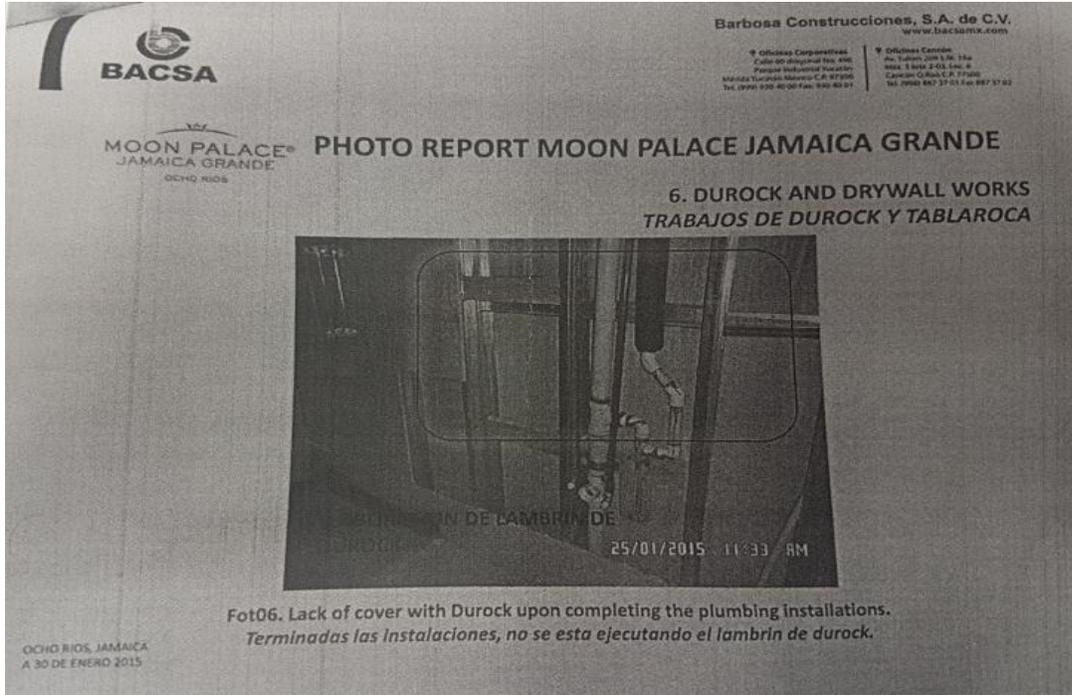












INTEGRITY COMMISSION Concerning the Circumstances which Led to the Approval and Issuance of Prescribed Licences and Permits by the Ministry of Labour and Social Security, for the Construction, Renovation and Operation of the Moon Palace Jamaica Grande Hotel

