



**Investigation Report into
concerns that Mr. Leslie
Campbell, a Member of the
Senate, failed to provide
information requested by the
Commission in respect of his
Statutory Declarations**

**INTEGRITY COMMISSION
APRIL 2023**



This Publication until tabled in Parliament shall be confidential.

Section 55 and 56 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.

56.—(1) 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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1. Chapter 1 – Summary of Investigation and Findings

- 1.1 This investigation report by the Director of Investigation (DI) relates to a referral by the Director of Information and Complaints (DoIC) on behalf of the Commissioners which presented, inter alia, concerns that **Mr. Leslie Campbell**, a Member of the Senate, failed to provide information requested by the DoIC, without reasonable cause, in respect of the Statutory Declarations he submitted to the present and legacy Integrity Commissions (the Commission), for the periods ending February 25, 2016, December 31, 2016, December 31, 2017, December 31, 2018, December 31, 2019 and September 15, 2020.
- 1.2 During the course of the investigation, it was found that Mr. Leslie Campbell, failed to provide the requested information to the Commission and, having failed to do so, committed offences under **the Parliament (Integrity of Members) Act** (hereinafter **PIMA**) and **the Integrity Commission** (hereinafter the **ICA**).



2. Chapter 2 – Background

2.1 Why was this investigation conducted?

2.1.1 This investigation was commenced based on a referral by the Director of Information and Complaints (DoIC) on behalf of the Commissioners, Integrity Commission. The referral indicated that Mr. Leslie Campbell is in breach of the PIMA and ICA by virtue of his failure to provide information requested from him by the Commission for the periods ending February 25, 2016 to September 15, 2020 in respect of his Statutory Declarations.

2.2 Jurisdiction and decision to investigate

2.2.1 Section 33 of the ICA empowers the DI to investigate non-compliance with the Act by public officials. Consistent with the foregoing provision, the DI determined that an investigation was warranted based on the nature of the allegation.

2.3 The Investigation

2.3.1 During the investigation, officers of the Investigation Division pursued the following lines of enquiry/actions:

a) obtained information and witness statements from the responsible officers at:

(i) Houses of Parliament; and



(ii) Information and Complaints Division of the Integrity Commission;

b) reviewed the information and statements collected and prepared the case file and report.

2.4 Who is the concerned public official pertinent to this Investigation?

2.4.1 Mr. Leslie Campbell, a Member of the Senate, is the concerned public official.



3. Chapter 3 – Terms of Reference

3.1 The DI sought to establish the following in respect of the declarant, Mr. Campbell, whether:

- a) He had a legal obligation to file Statutory Declarations with the Commission and, if so, whether that obligation was discharged;
- b) He complied with the Commission's notice requiring him to provide further information, if not, whether this constitutes an offence under the Act; and
- c) Recommendations ought to be made to the Director of Corruption Prosecution.



4. Chapter 4 – The Law, Evidence and Discussion of Findings

4.1 The overarching objective of the Commission's investigation was to determine whether there is merit in the allegation that Mr. Campbell failed to provide the information as required under the **PIMA** and the **ICA**. The relevant provisions of law are as follows:

4.1.1 **Section 2 of PIMA and ICA:**

Both of the captioned provisions define Parliamentarians as a Member of the House of Representatives and Senators.

4.1.2 **Section 4 of PIMA and Section 39(1) of ICA:**

The captioned provisions require that Parliamentarians file Statutory Declarations with the Commission.

See Sections 2, 4(1) and 15(1)(c) of the Parliamentary (Integrity of Members) Act and Sections 2, 39(1) and 43(1)(b) of the Integrity Commission Act at Appendix 1.



4.2 The obligation to file Statutory Declarations

4.2.1 Under the PIMA and the ICA, Parliamentarians have a legal obligation to file Statutory Declarations. See Sections 2 of the PIMA at Appendix 1.

4.2.1.1 The investigation covered the periods 2016 to 2020. A witness statement obtained from the duly authorized officer at the House of Parliament indicates that Mr. Campbell was, at all material times, a parliamentarian. A parliamentarian under both the PIMA and the ICA is required to file Statutory Declarations with the Commission.

4.3 Discharge of obligation to file Statutory Declarations

4.3.0 Having established Mr. Campbell's obligation to file Statutory Declarations with the Commission, it is further necessary to determine whether said obligation was discharged. The evidence provided by Reporting and Compliance Officer at the Information and Complaints Division, Integrity Commission revealed that Mr. Campbell had filed the required Statutory Declarations with the Commission for the periods in question.

4.4 The obligation to provide information upon request by the Commission

4.4.0 Section 7(1) PIMA and Section 42(2) of ICA empowers the Commission to request further information by notice in writing from a declarant in respect of their Statutory Declaration.

4.4.1 Section 15(1)(c) of PIMA and Section 43(1)(b) of ICA:



Under the captioned provisions, a Parliamentarian who fails, without reasonable cause to provide information to the Commission upon request, commits an offence.

4.4.2 The DI is in possession of evidentiary material which indicates that Mr. Campbell was, by way of notice in writing, requested to provide further information to the Commission as outlined below:

- i) By way of letter dated June 20, 2016, Mr. Campbell was requested to submit further information to the Commission in respect of his Statutory Declaration submitted for the period ended February 25, 2016, which was filed on March 28, 2016. Mr. Campbell was required to provide the requested information by July 20, 2016. Table 1 below sets out the particulars of the Commission's request of Mr. Campbell. The evidence indicates that the information requested was not provided by the deadline given.
- ii) On September 14, 2016, a reminder was sent to Mr. Campbell with a new deadline of October 14, 2016 to provide the information requested.
- iii) On September 22, 2016, Mr. Campbell responded via letter acknowledging receipt of the reminder of September 14, 2016. In his response, Mr. Campbell provided some information, however the information provided did not satisfy the Commission's request.
- iv) Subsequent reminders were sent to Mr. Campbell on October 10, 2016, December 20, 2016, May 17, 2017, October 3, 2017, July 10, 2018, July 3,



2019, September 13, 2019, January 7, 2019, November 14, 2019, February 10, 2020, December 21, 2020 and December 10, 2021. Notwithstanding the aforementioned reminders, Mr. Campbell failed to fully comply with the Commission's request for further information in respect of his Statutory Declarations.

- v) The DI highlights here that by way of letter dated February 20, 2017, Mr. Campbell was among two parliamentarians reported to the parliamentary leaders by the Commission in respect of his non-compliance with the requests of the Commission.
- vi) The DI highlights further, that in the Commission's letter dated February 10, 2020, Mr. Campbell was advised that should he fail to comply with its request, he would be referred for prosecution.

Table 1: Request for further information in respect of the Statutory Declaration filed for the period ended February 25, 2016

Statutory Declaration for the Period ended February 25, 2016, filed on May 26, 2016		
Information Requested on June 20, 2016	Information Provided	Information Outstanding
Xxxx Xxx Management Intl. Ltd.	September 22, 2016	
Xxxxxx Bank Loan - Account Balance		Xxxxxx Bank Loan - Account Balance
Xxxxxx Life a/c # *****729 *****278 - surrender value		Xxxxxx Life *****729 *****278- surrender value
Xxxxxx Life - surrender value		Xxxxxx Life - surrender value



vii) In respect of the Statutory Declaration filed by Mr. Campbell for the period ended December 31, 2016, which was submitted on March 31, 2017, Mr. Campbell was, by way of letter dated May 17, 2017, requested to provide further information to the Commission. A deadline of June 16, 2017 was given for Mr. Campbell to satisfy the Commission's request. The referenced request is further particularized in Table 2 below. Subsequent to the deadline elapsing, reminders were sent to Mr. Campbell on October 3, 2017, July 10, 2018, January 7, 2019 and July 3, 2019 to provide the requested information.

viii) On August 5, 2019, Mr. Campbell responded by way of letter acknowledging receipt of the reminder of July 3, 2019. Mr. Campbell also provided some information however, the Commission's request remained substantially unfulfilled. Further reminders were sent to Mr. Campbell on September 13, 2019, November 14, 2019, February 10, 2020, December 21, 2020 and December 10, 2021. To date, Mr. Campbell has not fully complied with the referenced request.

Declaration for the Period ended December 31, 2016, filed on March 31, 2017		
Information Requested	Information Provided	Information Outstanding
Xxxxxx Bank - USD Balance	August 5, 2019	
Xxxxxx Bank Loan - Account Balance		Xxxxxx Bank Loan - Account Balance
Xxxxxx Life *****729 *****278- surrender value		Xxxxxx Life *****729 *****278- surrender value



Xxxxxx Life - surrender value		Xxxxxx Life - surrender value
2011 BMW X6 - status, sale price	August 5, 2019	
46B Xxxxx Towers - copy of title	August 5, 2019	

Table 2: Request for further information in respect of the Statutory Declaration filed for the period ended December 31, 2016

- ix) By way of letter dated July 10, 2018, Mr. Campbell was requested to provide further information to the Commission in respect of his Statutory Declaration for the period ended December 31, 2017, which was submitted by him on March 29, 2018. The information requested is as tabulated in Table 3. Subsequent to the deadline having elapsed and Mr. Campbell's having failed to provide the information requested, reminders were sent to him on January 7, 2019 and July 3, 2019.
- x) On August 5, 2019, Mr. Campbell responded acknowledging receipt of the Commission's July 3, 2019 reminder, he also provided some information which partially satisfied the Commission's request. Further reminders to provide the outstanding information were sent to Mr. Campbell on September 13, 2019, November 14, 2019, February 10, 2020, December 21, 2020 and December 10, 2021.
- xi) Further information was also provided by Mr. Campbell on March 31, 2020. The information was provided in the form of an attachment to his Statutory Declaration filed in respect of the period ended December 31, 2019. Notwithstanding the foregoing, the Commission's request remains partially unfulfilled (see table 3 below).



Table 3: Request for further information in respect of the Statutory Declaration filed for the period ended December 31, 2017

Declaration for the Period ended December 31, 2017, filed on March 29, 2018		
Information Requested	Information Provided	Information Outstanding
Xxxxxx Bank - USD Balance	August 5, 2019	
Xxxxxx Bank Loan - Account Balance		Xxxxxx Bank Loan - Account Balance
Xxxxxx Life ****729 ****278- surrender value		Xxxxxx Life ****729 ****278- surrender value
Xxxxxx Life - surrender value		Xxxxxx Life - surrender value
2011 BMW X6 - status, sale value	August 5, 2019	
46B Xxxxxx Towers - copy of title	August 5, 2019	

xii) As it relates to Mr. Campbell's Statutory Declaration for the period ending December 31, 2018, which was filed on June 6, 2019, by way of letter dated July 3, 2019, he was requested to provide further information to the Commission. A deadline of August 5, 2019 was given for Mr. Campbell to comply with the Commission's request. The particulars of the request are provided in table 4 below.

xiii) The deadline having passed, a reminder was sent to Mr. Campbell by the Commission for him to comply with the referenced request. On August 5, 2019, Mr. Campbell responded acknowledging receipt of the Commission's July 3, 2019 letter. Additionally, Mr. Campbell provided a



portion of the information requested by the Commission. Further reminders were sent to Mr. Campbell on September 13, 2019, November 14, 2019, February 10, 2020, December 21, 2020 and December 10, 2021. To date, Mr. Campbell has not fully complied with the Commission's request (see table 4 below).

Table 4: Request for further information in respect of the Statutory Declaration filed for the period ended December 31, 2018

Declaration for the Period ended December 31, 2018, filed on June 6, 2019		
Information Requested	Information Provided	Information Outstanding
Xxxxxxx Bank Loan - Account Balance		Xxxxxxx Bank Loan - Account Balance
Xxxxxxx Life *****729 *****278- surrender value		Xxxxxxx Life *****729 *****278- surrender value
Xxxxxxx Life - surrender value		Xxxxxxx Life - surrender value
Salary received from XXXXXXXX & XXXXXXXX	August 5, 2019	

xiv) In respect of Mr. Campbell's Statutory Declaration for the period ended December 31, 2019, which was filed by him on March 31, 2020, by way of letter dated December 21, 2020, he was requested to provide further information to the Commission. The information requested is as tabulated in table 5 below. A deadline of January 8, 2021 was set for Mr. Campbell to submit the information requested. The information requested by the Commission was not provided by the deadline. As a result, a reminder in respect of same was sent to Mr. Campbell. The information requested remains outstanding (see table 5 below).



Table 5: Request for further information in respect of the Statutory Declaration filed for the period ended December 31, 2019

Declaration for the Period ended December 31, 2019, filed on March 31, 2020		
Information Requested	Information Provided	Information Outstanding
Xxxxxx Bank Loan - Account Balance		Xxxxxx Bank Loan - Account Balance
Xxxxxx Life ****729 ****278- surrender value		Xxxxxx Life ****729 ****278- surrender value
Xxxxxx Life - surrender value		Xxxxxx Life - surrender value

xv) Regarding the Statutory Declaration for the period ended September 15, 2020, which was filed by Mr. Campbell on December 31, 2020, by way of letter dated December 10, 2021, the Commission requested that he provide further information in respect of same. The parameters of the referenced request are outlined in table 6 below. A deadline of December 24, 2021 was also indicated in the letter for Mr. Campbell to provide the information requested. To date, Mr. Campbell has not provided the information to the Commission (see table 6 below).

Table 6: Request for further information in respect of the Statutory Declaration filed for the period ended September 15, 2020

Declaration for the Period ended September 15, 2020, filed on December 31, 2020		
Information Requested	Information Provided	Information Outstanding
Xxxxxx Bank Loan - Account Balance		Xxxxxx Bank Loan - Account Balance
Xxxxxx Life ****729 ****278- surrender value		Xxxxxx Life ****729 ****278- surrender value
Xxxxxx Life - surrender value		Xxxxxx Life - surrender value



4.5 Discussion of Findings

4.5.0 During the course of the investigation into the allegations against Mr. Campbell, the DI followed all reasonable lines of enquiry, gathered evidential material and collected/recorded the statements of witnesses deemed necessary.

4.5.1 Based on the evidence outlined above, inter alia the following have been established:

- (a) Mr. Campbell by virtue of being a parliamentarian, was required, at the material time, to file Statutory Declarations with the Commission, which he did;
- (b) The Commission is empowered under ICA and PIMA to, by notice in writing, request further information from declarants who have submitted Statutory Declarations. Further and having regard to the Statutory Declarations submitted by Mr. Campbell, further information was requested from him;
- (c) The Commission lawfully requested further information from Mr. Campbell by making said request in writing. Further, Mr. Campbell is in receipt of the Commission's requests, this is evidenced inter alia by his response thereto and by his partial compliance in some instances. As can be seen in table 7 below, significant efforts were made by the Commission to secure Mr. Campbell's full compliance with its requests, to no avail; and



(d) Mr. Campbell was advised of the consequences that would flow from his failure to comply with the Commission's requests.

Table 7: Summary of Requests, Responses and Acknowledgements

Declaration Period	# of Requests*	# of responses provided	Acknowledgement
February 25, 2016	13	2	Letters dated September 22, 2016 & August 5, 2019
December 31, 2016	9	1	Letters dated August 5, 2019
December 31, 2017	8	1	Letters dated August 5, 2019
December 31, 2018	6	1	Letters dated August 5, 2019
December 31, 2019	2	None	None
September 15, 2020	1		Acknowledgement signature dated December 17, 2021
Totals	39	5	

4.5.2 Further to the foregoing and as it relates to determining whether Mr. Campbell's conduct amounts to a breach of PIMA and ICA, it is sufficient to prove:

(a) an obligation to provide the information requested on the declarant's part;



- (b) that the request was lawful, that is, the Commission is entitled to the information and the request was appropriately made (in writing);
- (c) that Mr. Campbell was aware of the request, more particularly, that he received the Commission's notice in writing; and
- (d) that Mr. Campbell has provided no lawful excuse or justification for his failure to comply (defence).

Prima facie, in all of the circumstances of this case, the DI finds that the elements set out in paragraph 4.5.2 (a-d) above have been proved to the required standard and therefore a referral to the Director of Corruption Prosecution in that regard is well grounded.



5. Chapter 5 – Conclusions and Recommendations

5.1 This chapter sets out the conclusions and the recommendations of the DI.

5.2 Conclusions

5.2.1 The DI concludes that Mr. Campbell, was by virtue of being a Member of Parliament, legally obligated to file Statutory Declarations with the Commission for the period 2016-2020.

5.2.2 The DI concludes that Mr. Campbell was requested to provide further information by the Commission and was aware of the requests.

The DI further concludes that Mr. Campbell's failure to provide the referenced information contravenes **Section 15(1)(c) of PIMA** and **Section 43(1)(b) of ICA**.



5.3 Recommendations

- 5.3.1 The Director of Investigation recommends that this report be referred to the Director of Corruption Prosecution for consideration.
- 5.3.2 Notwithstanding the foregoing, the DI recommends that the Director of Information and Complaints renews his request for Mr. Campbell to provide the requested information.

Kevon A. Stephenson, J.P.
Director of Investigation

April 25, 2023
Date



APPENDICES



Appendix 1: Sections 2, 4(1) & 15(1)(c) of the Parliament (Integrity of Member) Act, Sections 2, 39(1) & 43(1)(b) of the Integrity Commission Act

Section 2 of the PIMA:

““parliamentarian” means Members of the House of Representatives and Senators-“

Section 4(1) of the PIMA:

“4.-(1) Every person who is or was at any time after the 26th July, 1973, a Parliamentarian shall furnish to the Commission, a statutory declaration, subject to subsection (2), of his assets and liabilities, and his income in the form set out as Form A in the Second Schedule, at such times as may be required by or pursuant to this Act.”

Section 15(1)(c) of the PIMA:

“(1) Any person who-

(a) ...;

(b) ...;

(c) fails, without reasonable cause, to give such information as the Commission may require under section 7;

(d) ...,

shall be guilty of an offence, and shall, on summary conviction thereof in a Resident Magistrate's Court, be liable to a fine not exceeding two hundred



thousand dollars, or to imprisonment for a term not exceeding two years or to both such fine and imprisonment."

Section 2 of the ICA:

"*"parliamentarian" means a member of the House of Representatives or a member of the Senate;*"

Section 39(1) of the ICA:

"39-(1) Subject to the provisions of this Act, every person who, on or after the appointed day, is a parliamentarian or public official, shall submit to the Director of Information and Complaints, a statutory declaration of his assets and liabilities and his income in the form set out in the Third Schedule."

Section 43(1)(b) of the ICA :

"43-(1) A person who-

(a) ...;

(b) fails, without reasonable cause, to provide any information as the Director of Information and Complaints may require in accordance with the provisions of this Act, or

(c) ...;

commits an offence, and is liable on summary conviction in a Parish Court to a fine not exceeding five hundred thousand dollars, or to a term of imprisonment not exceeding six months and the Court may make an order mandating the person to comply with the requirement in respect of which the offence was committed."



Appendix 2: Summary of Tables 1-6 Request for further information in respect of the Statutory Declaration filed for the periods February 25, 2016 to September 15, 2020

Declaration Period	Information Requested	Information Provided	Outstanding Information
February 25, 2016	Xxxx Xxx Management Intl. Ltd.	September 22, 2016	
	Xxxxxx Bank Loan - Account Balance		Xxxxxx Bank Loan - Account Balance
	Xxxxxx Life a/c # *****729 *****278 - surrender value		Xxxxxx Life *****729 *****278- surrender value
	Xxxxxx Life - surrender value		Xxxxxx Life - surrender value
December 31, 2016	Xxxxxx Bank - USD Balance	August 5, 2019	
	Xxxxxx Bank Loan - Account Balance		Xxxxxx Bank Loan - Account Balance
	Xxxxxx Life *****729 *****278- surrender value		Xxxxxx Life *****729 *****278- surrender value
	Xxxxxx Life - surrender value		Xxxxxx Life - surrender value
	2011 BMW X6 - status, sale price	August 5, 2019	
	46B Xxxxxx Towers - copy of title	August 5, 2019	
December 31, 2017	Xxxxxx Bank - USD Balance	August 5, 2019	
	Xxxxxx Bank Loan - Account Balance		Xxxxxx Bank Loan - Account Balance
	Xxxxxx Life *****729 *****278- surrender value		Xxxxxx Life *****729 *****278- surrender value
	Xxxxxx Life - surrender value		Xxxxxx Life - surrender value
	2011 BMW X6 - status, sale value	August 5, 2019	
	46B Xxxxxx Towers - copy of title	August 5, 2019	
	Xxxxxx Bank Loan - Account Balance		Xxxxxx Bank Loan - Account Balance
December 31, 2018	Xxxxxx Life *****729 *****278- surrender value		Xxxxxx Life *****729 *****278- surrender value
	Xxxxxx Bank Loan - Account Balance		Xxxxxx Bank Loan - Account Balance



Declaration Period	Information Requested	Information Provided	Outstanding Information
	Xxxxxx Life - surrender value		Xxxxxx Life - surrender value
	Salary received from Xxxxxxx & Xxxxxxx	August 5, 2019	
December 31, 2019	Xxxxxx Bank Loan - Account Balance		Xxxxxx Bank Loan - Account Balance
	Xxxxxx Life *****729 *****278- surrender value		Xxxxxx Life *****729 *****278- surrender value
	Xxxxxx Life - surrender value		Xxxxxx Life - surrender value
September 15, 2020	Xxxxxx Bank Loan - Account Balance		Xxxxxx Bank Loan - Account Balance
	Xxxxxx Life *****729 *****278- surrender value		Xxxxxx Life *****729 *****278- surrender value
	Xxxxxx Life - surrender value		Xxxxxx Life - surrender value