



Investigation Report into concerns that Mr. Zavia Mayne, Minister of State and Member of Parliament, failed to provide information requested by the Commission in respect of his Statutory Declarations for the period 2018-2022, contrary to law.

INTEGRITY COMMISSION
JULY 2025



This Publication until tabled in Parliament shall be confidential.

Section 55 and 56 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.

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 his 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.

Integrity Commission
1st Floor, PIOJ Building
16 Oxford Road
P.O. BOX 540
Kingston 5
Telephone: 876-929-6460/876-929-8560/876-929-6466

INTEGRITY COMMISSION

INVESTIGATIONS INTO ALLEGATIONS OF BREACHES OF THE ICA BY MEMBER OF PARLIAMENT FOR ST. ANN SOUTH WESTERN MR. ZAVIA MAYNE

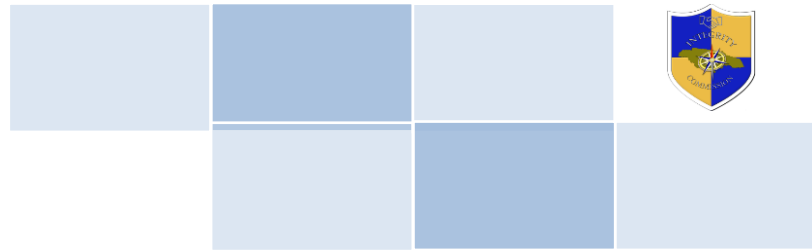
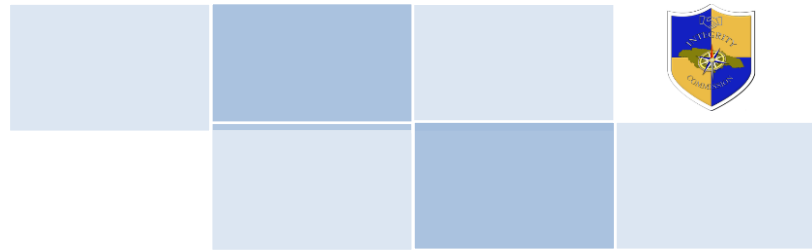


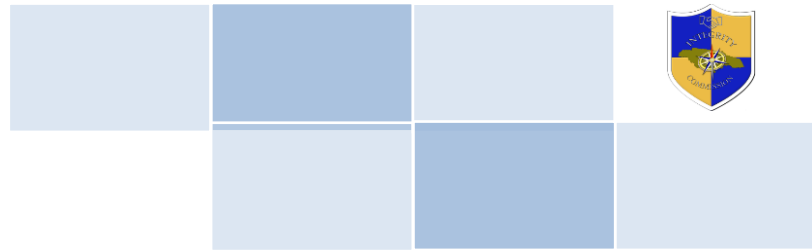
Table of Contents

Chapter 1 – Summary of Investigation and Findings.....	4
Chapter 2 – Background	5
Chapter 3 – Terms of Reference	7
Chapter 4 – The Law, Evidence and Discussion of Findings.....	8
4.4 Discussion of Findings	37
Chapter 5 – Conclusions and Recommendations	39
5.2 Conclusions	39
5.3 Recommendations	40



Chapter 1 – Summary of Investigation and Findings

- 1.1 This investigation report by the Director of Investigation (hereinafter DI) relates to concerns that Mr. Zavia Mayne, Minister of State in the Ministry of Finance and the Public Service, and Member of Parliament for the constituency of St. Ann South West, failed without reasonable cause, to provide information requested by the Director of Information and Complaints (hereinafter DoIC) in respect of the statutory declarations he submitted to the Integrity Commission (hereinafter the Commission), for the years 2018 to 2022.
- 1.2 It was found that Mr. Mayne was lawfully requested to provide information to the DoIC at the material time, and having failed to do so, committed an offence under **section 43(1)(b)** of the ***Integrity Commission Act*** (hereinafter ***ICA***).



Chapter 2 – Background

2.1 Why was this investigation conducted?

2.1.1 This investigation was commenced based on a referral by the DoIC on April 12, 2024, on behalf of the Commissioners of the Integrity Commission which was received by the DI on April 16, 2024. The referral raised concerns that Mr. Mayne may be in breach of the **ICA** by virtue of his failure to provide information requested from him by the DoIC, in respect of his statutory declarations for the years 2018, 2019, 2020, 2021 and 2022.

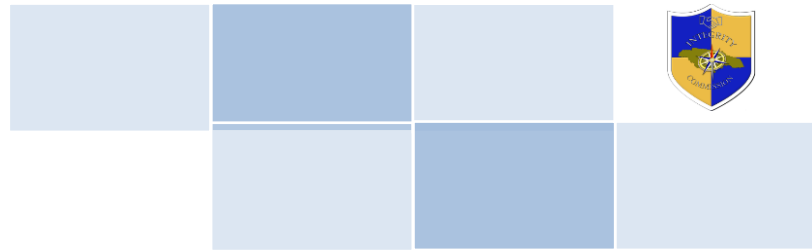
2.2 Jurisdiction and decision to investigate

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 alleged conduct.

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;
 - (ii) Office of the Registrar of Companies; and

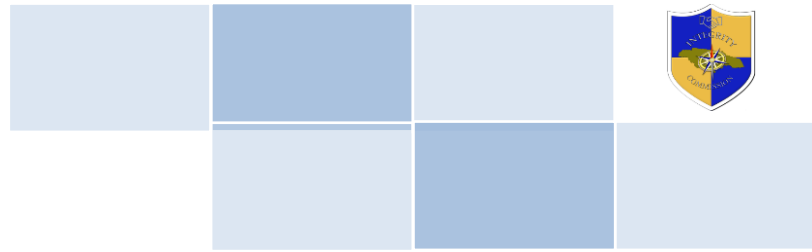


(iii) Information and Complaints Division of the Integrity Commission.

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

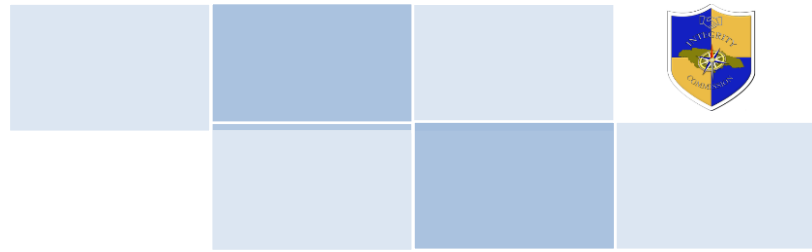
2.4 Who is the concerned public official pertinent to this Investigation?

2.4.1 Mr. Mayne, Minister of State in the Ministry of Finance and the Public Service, and Member of Parliament for the constituency of St. Ann South West, employed to the Houses of Parliament, is the concerned public official.



Chapter 3 – Terms of Reference

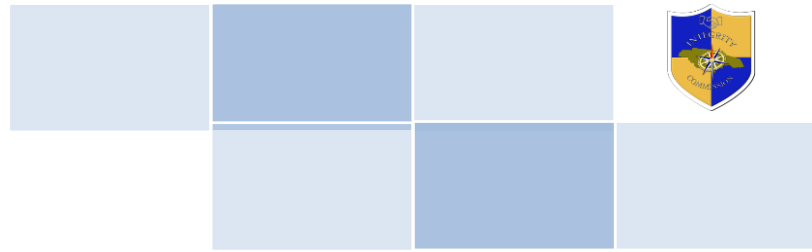
- 3.1 The DI sought to establish the following in respect of the declarant, Mr. Mayne, whether:
- (a) he had a legal obligation to file statutory declarations with the Commission for the years 2018, 2019, 2020, 2021 and 2022 and, if so, whether that obligation was discharged;
 - (b) information concerning his income, liabilities and assets were duly requested from him by the DoIC and if so, whether his failure to provide the information requested constitutes an offence under the Act; and
 - (c) recommendations ought to be made to the Director of Corruption Prosecution.



Chapter 4 – The Law, Evidence and Discussion of Findings

4.1 The Obligation to File

- 4.1.1 **Section 2** of the **ICA** defines a Parliamentarian as a Member of the House of Representatives and the Senate.
- 4.1.2 **Section 39(1)** of the **ICA** requires Parliamentarians to submit statutory declarations to the Commission, outlining their assets, liabilities and income.
- 4.1.3 The obligation to file statutory declarations can be established by proving that Mr. Mayne was a Member of Parliament at the material time.
- 4.1.4 The investigation covers the years 2018, 2019, 2020, 2021 and 2022. A witness statement obtained from the duly authorized officer at the Houses of Parliament indicates that at the material time, Mr. Mayne was a Member of Parliament for the constituency of St Ann South Western and employed to the Houses of Parliament. Additionally, Mr. Mayne was appointed as Minister of State in the Ministry of Labour and Social Security on March 27, 2018, and September 14, 2020, respectively. As indicated, Parliamentarians are required to file statutory declarations with the Commission.



4.2 Discharge of obligation

4.2.1 Having established Mr. Mayne's obligation to file statutory declarations with the Commission, it is further necessary to determine whether said obligation was discharged.

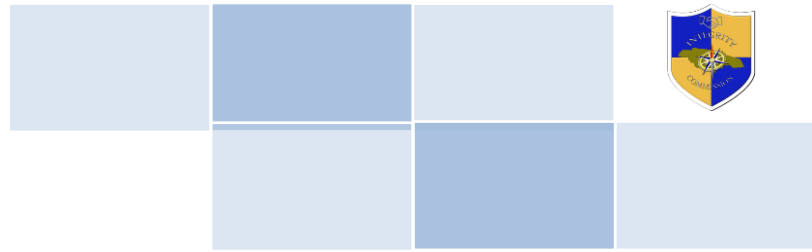
4.2.2 The evidence provided by Declarations Manager, at the Information and Complaints Division of the Commission revealed that Mr. Mayne filed the required statutory declarations with the Commission for the years in question.

4.3 The obligation to provide information upon request by the Commission

4.3.1 **Section 42(2)** of the *ICA* stipulates that, ***"where upon examination of a statutory declaration, the DoIC is of the opinion that further information is required in respect of the statutory declaration, he may, by notice in writing, request the declarant to submit such other information at such time as may be specified in the notice, and the declarant shall submit such information within the specified period"***.

4.3.2 **Section 43(1)(b)** of the *ICA*, provides that a person who fails, without reasonable cause to provide information as the DoIC may require in accordance with the provisions of this Act, commits an offence.

4.3.3 The DI is in possession of evidential material which indicates that several requests were made of Mr. Mayne by the DoIC for information relating to



his statutory declarations for the years 2018, 2019, 2020, 2021 and 2022.
The requests will be dealt with seriatim below.

4.3.4 The information requested by the DoIC was, in the main, pursuant to the assets, liabilities and income declared by Mr. Mayne in his statutory declarations for the years 2018, 2019, 2020, 2021 and 2022.

4.3.5 The DI is in possession of evidentiary material which indicates that Mr. Mayne was, by way of letters and a Notice, requested to provide information to the DoIC as outlined hereunder.

4.3.6 By way of a letter dated October 13, 2023, Mr. Mayne was informed that during its third-party verification process, the Commission identified information with respect to assets that were not previously disclosed on his statutory declarations. A request was made of Mr. Mayne to provide said information to the DoIC for the years 2018, 2019, 2020, 2021 and 2022. This information was to be submitted by October 25, 2023. The DI outlines below the DoIC's request for information from Mr. Mayne by way of a letter dated October 13, 2023, for the years in question.



" ...

The Integrity Commission, during its third-party verification process, identified information with respect to assets that were not previously disclosed on your Statutory Declarations. Please note the findings of the Commission below:

1. Companies Office of Jamaica – Registered Companies

Company	Date of Incorporation
i. Water Valley development Foundation limited	August 28, 2014
ii. Zavia Mayne & Co. Attorney-At-Law	May 3, 2011
iii. Racqstar Developers Limited	April 12, 2022

Attached, is a copy of the document from the Companies Office of Jamaica with details of the companies for ease of reference.

2. Tax Administration Jamaica - Automated Motor Vehicle System (AMVS)

Motor Vehicle	Date of Acquisition
i. 2008 Land Rover	November 28, 2012
ii. 2013 Motor Cycle CG150	October 30, 2013
iii. 2001 Toyota Townace	February 17, 2014

3. Financial Information of Accounts held with JMMB Group, National Commercial Bank Jamaica Limited, Sagcor Life Jamaica Limited and Guardian Life Limited during periods relevant to the Statutory Declarations that you submitted to the Integrity Commission.

Accounts	Date of Opening
i. JMMB Account # [REDACTED] 14	September 1, 2012
ii. NCB Investment Account # [REDACTED] 92	September 21, 2009
iii. NCB Credit Card Account # [REDACTED] 792	July 23, 2020
iv. Sagcor Life Policy # [REDACTED] 484	July 23, 2012
v. Guardian in Plus Policy# [REDACTED] 486	June 4, 2020

" ...

4.3.7 Mr. Mayne was given the opportunity to provide full particulars of any income, asset and/or liabilities he may have omitted from his statutory declarations whether they exist locally or abroad.

4.3.8 Mr. Mayne was advised of the legal basis for the DoIC request for information.

INTEGRITY COMMISSION

INVESTIGATIONS INTO ALLEGATIONS OF BREACHES OF THE ICA BY MEMBER OF PARLIAMENT FOR ST. ANN SOUTH WESTERN MR. ZAVIA MAYNE



4.3.9 Mr. Mayne responded to the DoIC's request in a letter date October 25, 2023, via email z*****@yahoo.com. Table 1 below outlines Mr. Mayne' response.

TABLE 1

Cons. #	Information Requested as at October 13, 2023	Information provided as at deadline October 25, 2023	Information not provided as at deadline October 25, 2023
1.	Audited Financial Statements, or details of the assets, liabilities, and income for Water Valley Development Foundation.	Mr. Mayne stated in his response to the Commission, <i>"Do be advised that Zavia Mayne has no beneficial interest in this entity that is a company limited by guarantee with the object of charitable purposes. The relevant exemptions in furtherance of its charitable status were previously granted by the Ministry of Investment, Industry and Commerce for Water Valley to trade without the use of the word limited. The application for registration has been lodged with the department of Friendly and Co-operative Society and a review of our case file highlights a requisition that is currently being addressed"</i> .	Audited Financial Statements, or details of the assets, liabilities, and income for Water Valley Development Foundation Limited.
2.	Audited Financial Statements, or details of the	Mr. Mayne stated in his response to the Commission	Audited Financial Statements, or details of the assets, liabilities,

INTEGRITY COMMISSION

INVESTIGATIONS INTO ALLEGATIONS OF BREACHES OF THE ICA BY MEMBER OF PARLIAMENT FOR ST. ANN SOUTH WESTERN MR. ZAVIA MAYNE



	assets, liabilities, and income for Zavia Mayne & Co. Attorney-At-Law	<i>"Do be advised that this is not a legal entity and serves only for the purposes of establishing relevant client trust accounts in keeping with the Legal Professions Act. The issue of disclosure of client trust accounts to the Integrity Commission was previously discussed and those accounts were removed from subsequent declarations".</i>	and income for Zavia Mayne and Company (Law Firm).
3.	Audited Financial Statements, or details of the assets, liabilities, and income for Racqstar Development Limited	Mr. Mayne stated in his response to the Commission, <i>"do be advised that Zavia Mayne is neither a shareholder or director of this entity and as such it would not form part of disclosed assets and liabilities. Zavia Mayne is the secretary of said company"</i> .	Audited Financial Statements, or details of the assets, liabilities, and income for Racqstar Development Limited.
4.	Interest in 2008 Land Rover	Mr. Mayne stated that, <i>"please be advised that I still own this motor vehicle which has been out of service for many years now"</i> .	
5.	Interest in 2013 Motor Cycle CG150	Mr. Mayne stated that, <i>"the motor cycle was a total loss in an accident years now and was never retrieved from</i>	

INTEGRITY COMMISSION

INVESTIGATIONS INTO ALLEGATIONS OF BREACHES OF THE ICA BY MEMBER OF PARLIAMENT FOR ST. ANN SOUTH WESTERN MR. ZAVIA MAYNE



		storage subsequent to the accident".	
6.	Interest in 2001 Toyota Townace	The Mr. Mayne stated that, <i>"this unit was sold in the period 2016 to 2017 and my reasonable knowledge and belief is that it was transferred in the name of the Purchaser"</i> .	
7.	Interest in JMMB Account ***14	Mr. Mayne stated that, <i>"I have no recollection of said account which was opened in 2012 and hereby request further time to checks with said financial institution"</i> .	Information on his interest in JMMB Account ***14
8.	Interest in NCB Investment Account ***92 Interest in NCB Credit Card Account ***792	Mr. Mayne stated that, <i>"By way of letter dated January 19, 2023 (erroneously stated as 2022) NCB would have detailed account balances with the institution to include credit cards and investments. I therefore see no reason for the Commission to enquire beyond the bank's letter"</i> .	Information on his interest in NCB Investment Account ***92 Information on his interest in NCB Credit Card Account ***792
9.	Interest in Sagicor Life Policy ***484	The Mr. Mayne stated that, <i>"Sagicor by way of letter dated January 19, 2023 provided details of my business at said entity. I therefore state that I do</i>	Information on his interest in Sagicor Life Policy # ***484

INTEGRITY COMMISSION

INVESTIGATIONS INTO ALLEGATIONS OF BREACHES OF THE ICA BY MEMBER OF PARLIAMENT FOR ST. ANN SOUTH WESTERN MR. ZAVIA MAYNE



		<i>not recall having an insurance life policy ***484".</i>	
10.	Interest in Guardian in Plus Policy ***486	<i>The Mr. Mayne stated that, "I again state that by way of letter dated March 3, 2023, Guardian Life provided a breakdown of all insurance policies held as at December 2022. The basis of looking beyond this letter is yet to be established by the Commission".</i>	Information on his interest in Guardian in Plus Policy ***486

4.3.10 By way of a letter dated November 9, 2023, the DoIC requested that Mr. Mayne provide additional information to the Commission regarding the statutory declarations he submitted for the years 2018, 2019, 2020, 2021 and 2022. Mr. Mayne was required to provide information on financial accounts, assets, incomes earned from rental properties, salary/wages from Zavia Mayne and Company (Law Firm), cost to make improvement to properties that he had declared and the source of funds where applicable. Audited financial statements for five (5) companies were also requested. The deadline for submitting this information, along with the necessary supporting documents, was November 24, 2023. Outlined below are the particulars of the DoIC's request.

INTEGRITY COMMISSION

INVESTIGATIONS INTO ALLEGATIONS OF BREACHES OF THE ICA BY MEMBER OF PARLIAMENT FOR ST. ANN SOUTH WESTERN MR. ZAVIA MAYNE



“...”

In the circumstance, the Commission requests that you provide us with the following information by Friday, November 24, 2023, along with all supporting documents:

1. Confirmation from the relevant institutions regarding the status and/or balance on the Accounts and the Cash Surrender Value, Investment Value or Accumulated Value on the Insurance Policies with respect to the aforementioned declaration dates –

Account/ Insurance Policy	31/12/2018	31/12/2019	03/09/2020	31/12/2021	31/12/2022
NCB Current Account # [REDACTED] 776			✓		✓
NCB (CFC Savings) Account # [REDACTED] 921			✓		✓
NCB Current Account # [REDACTED] 005			✓		✓
NCB Savings Account # [REDACTED] 423					✓
NCB Investment Account	✓	✓	✓	✓	✓
NCB Mastercard Platinum Account # [REDACTED] 683	✓	✓	✓	✓	
NCB Visa Platinum Business Account # [REDACTED] 800			✓	✓	
NCB Visa Business Account # [REDACTED] 728	✓	✓	✓	✓	

INTEGRITY COMMISSION

INVESTIGATIONS INTO ALLEGATIONS OF BREACHES OF THE ICA BY MEMBER OF PARLIAMENT FOR ST. ANN SOUTH WESTERN MR. ZAVIA MAYNE



Account/ Insurance Policy	31/12/2018	31/12/2019	03/09/2020	31/12/2021	31/12/2022
NCB Credit Card Account # ending 1212	✓	✓	✓		✓
NCB Credit Card Account # ending 5980	✓	✓	✓		✓
NCB Credit Card Account # ending 1705	✓	✓	✓		✓
NCB Credit Card Account # ending 5512	✓	✓	✓		✓
NCB Credit Card Account # [REDACTED] 792			✓	✓	✓
BNS Electronic Access Account # [REDACTED] 701					✓
BNS Primary Savings Account # [REDACTED] 033	✓	✓	✓		✓
BNS Scotia Plan Loan Account # [REDACTED] 115					✓
BNS Residential Mortgage Account # [REDACTED] 777					✓
BNS Residential Mortgage Account # [REDACTED] 271					✓
Mayberry Investments (Managed Portfolio) Account					✓
Mayberry Investments (Cash/Current Account) Account # [REDACTED] 55					✓
Mayberry Investments (Mayberry USD Money Market) Account # [REDACTED] 34			✓	✓	✓
JMMB (EMMA) Portfolio Account # [REDACTED] 60					✓

In the event that any of the above-mentioned Accounts or Policies has been closed, confirmation of the date of closure is required, in addition to information for the relevant date(s) of declaration prior to closure.

2. The Commission notes that four (4) Accounts held with Cornerstone Trust and Merchant Bank were included on your 2022 Statutory Declaration. Kindly provide confirmation from Cornerstone Trust and Merchant Bank regarding the opening date of each account. In the event that any of the undermentioned accounts were opened prior to January 2022, the balance on each account would be required for the relevant declaration date(s) –

- Cornerstone Trust and Merchant Bank Account # [REDACTED] 300;
- Cornerstone Trust and Merchant Bank Account # [REDACTED] 301;

INTEGRITY COMMISSION

INVESTIGATIONS INTO ALLEGATIONS OF BREACHES OF THE ICA BY MEMBER OF PARLIAMENT FOR ST. ANN SOUTH WESTERN MR. ZAVIA MAYNE



- c. Cornerstone Trust and Merchant Bank Account # 015-300; and
 - d. Cornerstone Trust and Merchant Bank (Mortgage Loan) Account # 012-300.
3. The disposal price for the 2015 Honda Accord;
 4. Gross income earned from rental of properties for the years 2021 and 2022. Provide evidence to support this source;
 5. Gross salary/wages earned from Zavia Mayne and Company (Law Firm) for the years 2020, 2021 and 2022;
 6. Cost to improve each property, if any improvement was undertaken, and the source(s) of funds for each declaration period, where applicable –
 - a. Richmond, St. Ann;
 - b. 25 Summit Drive, Kingston 8, St. Andrew;
 - c. Lot 2 Sherbourne;
 - d. Seymour Park;
 - e. Springs Plaza; and
 - f. Lot 11 Cherry Hill.
 7. Audited Financial Statements for the periods ended December 31, 2018, December 31, 2019, December 31, 2020, December 31, 2021 and December 31, 2022, with respect to the undermentioned Companies –
 - a. Dilmayne Enterprises;
 - b. Jamaica Small Loans;
 - c. Arim Debt Solutions;
 - d. Motor Bliss Limited; and
 - e. St Dacres House.

...

4.3.11 Table 2 below outlines the information requested from Mr, Mayne and the extent of his compliance with said request.

INTEGRITY COMMISSION

INVESTIGATIONS INTO ALLEGATIONS OF BREACHES OF THE ICA BY MEMBER OF PARLIAMENT FOR ST. ANN SOUTH WESTERN MR. ZAVIA MAYNE



Table 2

Cons.#	Information requested by the DoIC on November 9, 2023	Information not provided as at deadline November 24, 2023
1.	Financial Accounts and Insurance Policies for the years 2018, 2019, 2020, 2021 and 2022 as outlined in Table 3 .	No information was provided up to the deadline of November 24, 2023.
2.	Information as it relates to four (4) accounts held at Cornerstone Trust and Merchant Bank, the opening date of each accounts and, in the event that any of the accounts were opened prior to January 2022, the balance on each account for the years: 2018, 2019, 2020, 2021 and 2022 as outlined in Table 3 .	No information was provided up to the deadline of November 24, 2023.
3.	The disposal price for 2015 Honda Accord as outlined in Table 3 .	No information was provided up to the deadline of November 24, 2023.
4.	Gross Income earned from rental of properties for year 2021 and 2022 as outlined in Table 3 .	No information was provided up to the deadline of November 24, 2023.
5.	Gross salary/wages earned from Zavia Mayne and Company (Law Firm) for year 2020, 2021 and 2022 as outlined in Table 3 .	No information was provided up to the deadline of November 24, 2023.



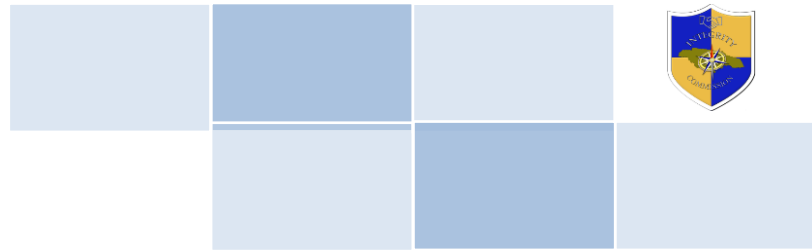
6.	Cost to improve the following properties if any improvement was undertaken and the source(s) of funds for each declaration period where applicable: <ul style="list-style-type: none">• Richmond St. Ann• 25 Summit Drive, Kingston 8, St. Andrew• Lot 2 Sherbourne• Seymour Park• Springs Park• Lot 11 Cherry Hill as outlined in Table 3.	No information was provided up to the deadline of November 24, 2023.
7.	Audited Financial Statements, or details of the Company's assets, liabilities, and income with respect to the undermentioned Companies: <ul style="list-style-type: none">i. Dilmayne Enterprisesii. Jamaica Small Loansiii. Arim Debt Solutionsiv. Motor Bliss Limited St. Dacres Houses outlined in Table 3.	No information was provided up to the deadline of November 24, 2023.

4.3.12 Mr. Mayne failed to submit the requested information to the DoIC by the deadline November 24, 2023, without any explanation.

4.3.13 In a letter dated December 18, 2023, Mr. Mayne replied to the DoIC and stated, ***“I apologize for the delay in response but I believe that the queries contained in your missive of the 9th have all been answered in previous declarations along with their supporting documentation”***. He requested from the Commission, ***“the legal basis on which requisitions are made in relation to acquisitions made prior to the time when the duty to file***

INTEGRITY COMMISSION

INVESTIGATIONS INTO ALLEGATIONS OF BREACHES OF THE ICA BY MEMBER OF PARLIAMENT FOR ST. ANN SOUTH WESTERN MR. ZAVIA MAYNE



Statutory declaration would have arisen”. Mr. Mayne further stated that, ***“the requisition in relation to limited liability companies is unclear since the law mandates the filing of a personnel [sic] financial declaration. The request for audited financial statements of limited liability companies, I believe is outside of your jurisdiction and is improper. I will gladly reverse this position with proof of your legal authority to do so”.***

4.3.14 Mr. Mayne included in his letter that he is ready to assist the Commission with finalization of his declarations, but the recent correspondence from the DoIC suggests that the DoIC is on a ***“fishing expedition”***. However, he is prepared to meet and discuss any reasonable outstanding matter at a date convenient to the DoIC. The relevant portion of the letter dated December 18, 2023, sent by Mr. Mayne to the DoIC in response to letter dated November 9, 2023, for additional information is provided below.



“ ...

Integrity Commission
1st Floor PIOJ Building
16 Oxford Road
Kingston 5
Jamaica, W.I.

Attention: Mr. Craig Beresford

Dear Sir,

Re: Statutory Declaration of Assets, Liabilities and Income



I refer to the captioned and your letter dated November 9, 2023.

I apologize for the delay in response but I believe that the queries contained in your missive of the 9th have all been answered in previous declarations along with their supporting documentation.

Added to this, I seek from you the legal basis on which requisitions are made in relation to acquisitions made prior to the time when the duty to file Statutory declaration would have arisen.

Further, the requisition in relation to limited liability companies is unclear since the law mandates the filing of a personnel financial declaration. The request for audited financial statements of limited liability companies I believe is outside of your jurisdiction and is improper. I will gladly reverse this position with proof of your legal authority to so do.

I remain ready to assist the Commission with your finalization of my declarations but the recent correspondence from your office suggest that you have now embarked on a “*fishing expedition*”.

I am prepared to meet and discuss any reasonable outstanding matter at a date convenient to you

Sincerely,

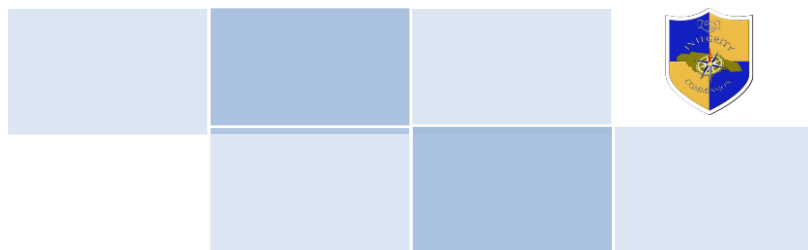
”
...

4.3.15 On February 13, 2024, Mr. Mayne was personally served with a Notice dated February 9, 2024, pursuant to **section 42(2)** of the *ICA* (hereinafter **s.42(2)** Notice). Reference was expressly made in the section **s.42(2)** Notice for additional information requested from Mr. Mayne as outlined in letters dated October 13, 2023, and November 9, 2023.

4.3.16 The **s.42(2)** Notice acknowledged and referred to Mr. Mayne's assertion that, ***“The request for audited financial statements of limited liability Companies I believe is outside of your jurisdiction and is improper” [sic].***

INTEGRITY COMMISSION

INVESTIGATIONS INTO ALLEGATIONS OF BREACHES OF THE ICA BY MEMBER OF PARLIAMENT FOR ST. ANN SOUTH WESTERN MR. ZAVIA MAYNE



Mr. Mayne was informed by DoIC through the **s.42(2)** Notice that, ***“the Commission’s request is being made lawfully, pursuant to Sections 32(1)(a) and 32(1)(b) of the Integrity Commission Act 2017.***

4.3.17 Mr. Mayne was further advised that the request was being made in keeping with **s.42(2)** and **section 43** of the **ICA**, and that the statutory declaration form must be completed in full.

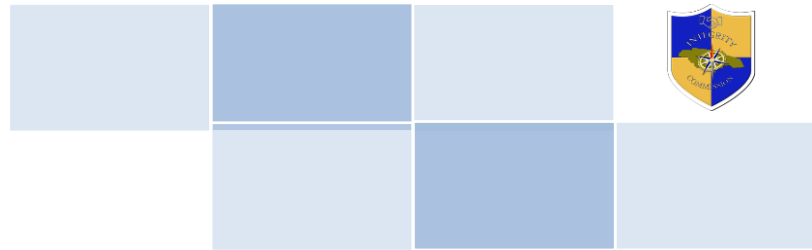
4.3.18 The **s.42(2)** Notice however, excluded the request for information which were previously made in respect of NCB account # ending 005 and NCB account # ending 776.

4.3.19 Mr. Mayne was informed that failure to comply with the request will constitute an offence pursuant to **section 43(1)(b)** of the **ICA**.

4.3.20 More particularly, the **s.42(2)** Notice explicitly stated, ***“TAKE NOTICE THAT you, Mr. Zavia Taze Mayne are required to provide the Integrity Commission with the information and documentations as requested by Thursday, February 29, 2024, failure of which constitutes an offence pursuant to Section 43(1)(b) of the Integrity Commission Act for which you are liable on summary conviction in a Parish Court to a fine not exceeding Five Hundred Thousand Dollars (\$500,000.00) or to a term of imprisonment not exceeding six (6) months, in addition to being ordered by the Court to comply with the requirement in respect of which the offence was committed”.***

INTEGRITY COMMISSION

INVESTIGATIONS INTO ALLEGATIONS OF BREACHES OF THE ICA BY MEMBER OF PARLIAMENT FOR ST. ANN SOUTH WESTERN MR. ZAVIA MAYNE



4.3.21 Despite the explicit indication that non-compliance with the **s.42(2)** Notice would constitute an offence under the **ICA**, Mr. Mayne failed to provide the required information to the DoIC by the stipulated deadline of February 29, 2024.

4.3.22 On March 4, 2024, a letter was sent by Mr. Mayne to the DoIC via electronic mail, acknowledging receipt of the **s.42(2)** Notice. Mr. Mayne requested additional time of thirty (30) days to provide the requested information to the DoIC. He expressed that the Local Government Elections were held on February 26, 2024, and that said elections had prevented him from meeting the stipulated deadline.

4.3.23 By way of a letter dated March 6, 2024, DoIC, acknowledged receipt of Mr. Mayne's March 4, 2024, letter and granted him an extension to March 20, 2024, to provide the requested information.

4.3.24 On the deadline of March 20, 2024, Mr. Mayne did not submit the information requested by the DoIC, nor did he provide the DoIC with an explanation as to his reason for not providing the requested information.

4.3.25 On March 25, 2024, a letter was sent to the DoIC by Mr. Mayne, where he stated, ***“Do find attached copies of all declarations for period 2018 to 2022. I have also taken the liberty to provide you copies of the supporting documents that accompanied each declaration”***. Mr. Mayne's response is provided in table 3 below.

INTEGRITY COMMISSION

INVESTIGATIONS INTO ALLEGATIONS OF BREACHES OF THE ICA BY MEMBER OF PARLIAMENT FOR ST. ANN SOUTH WESTERN MR. ZAVIA MAYNE

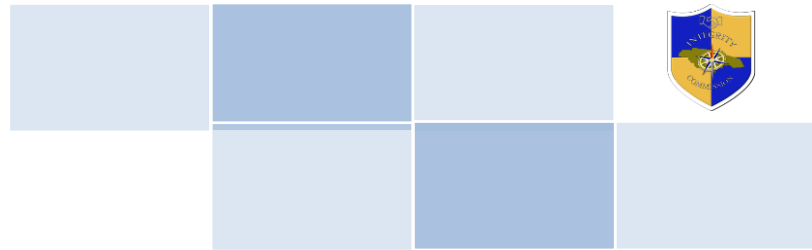


Table 3

Information Requested as at February 9, 2024	Information provided by Mr. Mayne in letter dated March 25, 2024.
1) Information on requested financial institutions	"In relation to the accounts you have requisitioned as not having been previously declared in the completed declaration forms nor disclosed in letters from the financial institutions, I suggest you clarify the information provided to you consequent to your third party checks. My previous correspondences have been very clear in this regard."
2) Provide confirmation from Cornerstone Trust and Merchant Bank regarding the opening date of accounts, and in the event that any of the accounts were opened prior to January 2022, the balance account for the relevant declaration year.	"In relation to accounts at Cornerstone that emerged for the period 2022, I advise that these accounts were established in 2022."
3) The disposal price for the 2015 Honda Accord	"The 2015 Honda Accord was transferred by love and affection."
4) Gross income earned from rental of properties for the years 2021 and 2022. Provide evidence to support the source.	No information provided.
5) Gross salary/wages earned from Zavia Mayne Company (Law Firm) for the years 2020, 2021 and 2022.	No information provided.

INTEGRITY COMMISSION

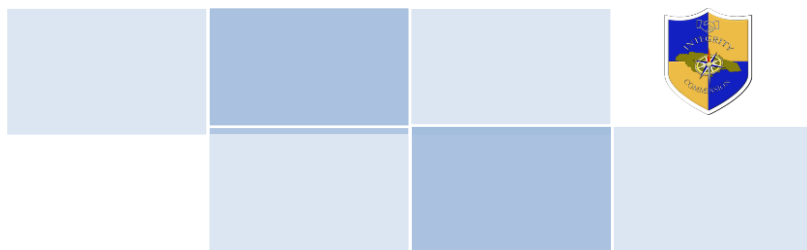
INVESTIGATIONS INTO ALLEGATIONS OF BREACHES OF THE ICA BY MEMBER OF PARLIAMENT FOR ST. ANN SOUTH WESTERN MR. ZAVIA MAYNE



Information Requested as at February 9, 2024	Information provided by Mr. Mayne in letter dated March 25, 2024.
<p>6) Cost to improve six (6) properties, if any improvement was undertaken, and the source(s) of funds for each declaration period, where applicable.</p>	<p>"In relation to properties listed at 6, I state that no improvement has been made in relation to Richmond, Summit Drive, Seymour Park, Cherry Hills and Springs Plaza. Lot 2 Sherbourne Heights is currently undergoing improvement."</p>
<p>7) Audited Financial Statement for five (5) companies for the years 2018, 2019, 2020, 2021 and 2022.</p>	<p>"In relation to your request for financial statements for the companies in which I own shares, I restate my position that my duty at law does not extend beyond declaring the shares owned and value of said shares. Any desire by you to scrutinize the financial statements of the listed companies has to follow the formal process of you requesting these statements from the companies themselves while providing the appropriate justification to so do. It is my understanding that it is my duty to make a personal declaration of the assets and liabilities in my name."</p>

INTEGRITY COMMISSION

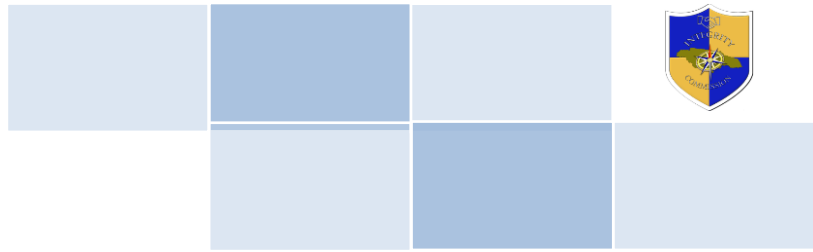
INVESTIGATIONS INTO ALLEGATIONS OF BREACHES OF THE ICA BY MEMBER OF PARLIAMENT FOR ST. ANN SOUTH WESTERN MR. ZAVIA MAYNE



4.3.26 **Section 39** of the **ICA** outlines the duty of Parliamentarians to submit statutory declarations as set out in the *Third Schedule*. This includes financial details that necessitate the disclosure of the names and addresses of Banks, in whose name the accounts are held, and the balance in each account. Furthermore, a template outlining the correct procedure for completing a statutory declaration is available on the Integrity Commission's website to ensure compliance generally and accuracy and completeness in the preparation and submission of statutory declarations. This resource serves as a convenient reference for individuals required to submit statutory declarations, and to eliminate vagueness and mistakes in completing said form.

4.3.27 Mr. Mayne did not comply with the requirements as specified in the Third Schedule. He declared his banking information as follows:

- i. statutory declaration date December 31, 2018, Mr. Mayne declared National Commercial Bank, Bank of Nova Scotia and wrote **“see letter from banks detailing account and balances”**;
- ii. statutory declaration date March 31, 2019, Mr. Mayne declared National Commercial Bank, Bank of Nova Scotia in the name of Zavia Mayne and **“see letter from banks detailing account and balances”**;
- iii. statutory declaration date September 3, 2020, Mr. Mayne declared, **“See attached letters from Bank of Nova Scotia and National Commercial Bank outlining accounting details”**;



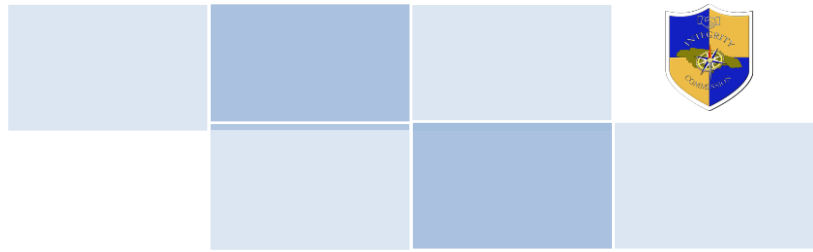
- iv. statutory declaration date March 31, 2021, Mr. Mayne declared **“See attached letters from Bank of Nova Scotia, Sagicor and National Commercial Bank outlining accounting details”**; and
- v. statutory declaration date March 31, 2022, Mr. Mayne declared **“See attached letters from the Bank of Nova Scotia, Cornerstone Trust & Merchant Bank, Sagicor and National Commercial Bank outlining accounting details”**.

Information requested regarding accounts and other assets

4.3.28 Having regard to Mr. Mayne's failure to comply with the DoIC's requests for information, the DI enquired into certain accounts and other assets in respect of which the DoIC requested further information, and for which said information was not provided. The enquiries were centred around the relevant statutory declarations and the financial institutions. The DI's findings are outlined below.

NCB Capital Market account ***92.

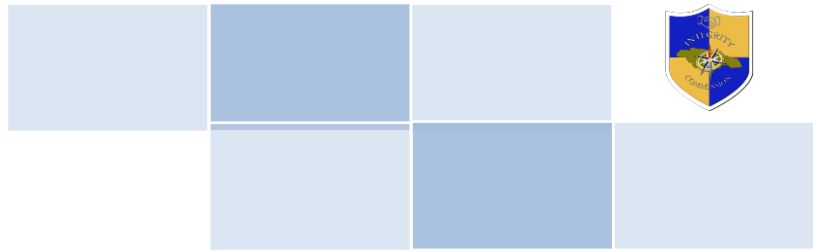
4.3.29 With respect to NCB Capital Markets Limited (“NCBCM”) account ending in ***92, Mr. Mayne was requested to provide the DoIC with information regarding the status of the said account. Mr. Mayne however, failed to comply with this request. A witness statement obtained from an authorized officer at NCBCM confirmed that Mr. Mayne held NCBCM account ***92 from January 1, 2018, to December 31, 2022. The account, which was originally opened on September 21, 2009, had a balance of JMD \$0.00 as



at December 31, 2022. The witness statement from NCBCM further indicates that on June 23, 2020, Mr. Mayne sold 378,405.72797 shares at a price of JMD \$13.28 per share, resulting in total proceeds of \$4,908,221.23. A withdrawal of \$4,908,221.23 was made on September 24, 2020, leaving the account with a balance of JMD \$0.00 as at December 31, 2020. No other transaction was seen in the account up to the date of this report. During the period 2018, 2019 and 2020, Mr. Mayne disclosed on his statutory declaration an investment at NCB, with a face value of \$4,000,000.00. He did not state the specific account number of this investment, nor did he state whether it was a NCBCM account.

NCB Saving account ***423

4.3.30 With respect to NCB Savings account ***423, Mr. Mayne was requested to provide to the DoIC, information regarding the status, and/or balance of the account for the year 2022. Mr. Mayne did not provide this information to the DoIC. A witness statement dated September 23, 2024, provided by NCB, contained a list of accounts owned by Mr. Mayne. This included account ***423. This account was opened January 1, 2004 and is active. No information was provided in relation to this account on Mr. Mayne's 2022 statutory declaration, however, attached to his 2021 statutory declaration is a letter from NCB, dated February 22, 2022. The letter contained details on the said account to include the balance on the



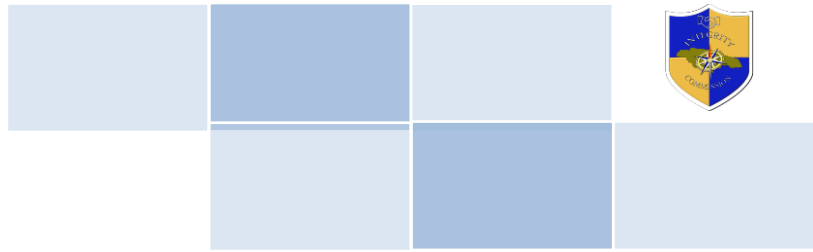
account as at February 22, 2022, and indicated that the account was active.

Information on NCB Visa Platinum Business accounts ***800

4.3.31 With respect to NCB Visa Platinum Business card number ***800, Mr. Mayne did not submit to the DoIC the requested information for the years 2020, and 2021. Upon review of his 2021 statutory declaration, a letter dated January 19, 2022, issued by NCB was attached. The letter contained details on card number ***800 to include the balance as at January 19, 2022, and indicated that the account was normal. No other information was provided in relation to the said card.

NCB Visa Platinum Business accounts ***728

4.3.32 With respect to NCB Visa Platinum Business card number ***728, Mr. Mayne did not submit to the DoIC the requested information for the years 2018, 2019, 2020, and 2021. Upon review of his 2021 statutory declaration, a letter dated January 19, 2022, issued by NCB was attached. The letter contained details on card number ***728 to include the balance as at January 19, 2022, and indicated that the account was normal. No other information was provided in relation to this card.



NCB Visa Credit Card accounts ***1212, ***5980, ***1705 and ***5512

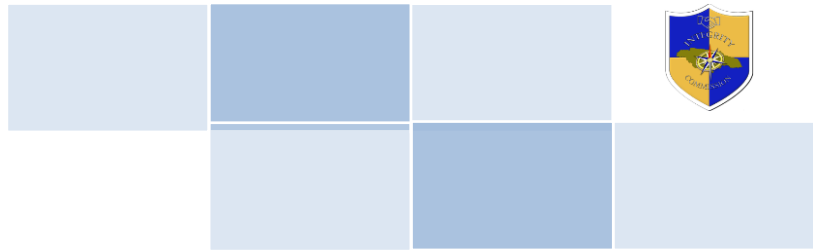
4.3.33 With respect to NCB Credit Card numbers ***1212, ***5980, ***1705 and ***5512 Mr. Mayne did not submit to the DoIC the requested information for the years 2018, 2019, 2020, and 2022. No information related to these credit cards was included in the NCB attachments on Mr. Mayne's statutory declarations for the years stated above. However, a letter dated February 22, 2022, issued by NCB, was attached to Mr. Mayne's 2021 statutory declaration. The letter provided details regarding credit cards ***1212, ***5980, ***1705 and ***5512, to include the balances as at February 22, 2022, and confirmed that these accounts were all active.

NCB Credit Card account ***792

4.3.34 With respect to NCB Credit card number ***792, Mr. Zavia Mayne did not submit to the DoIC the requested information for the years 2020, 2021, and 2022. No supporting documentation related to these credit cards was included in his statutory declarations for the referenced years.

Bank of Nova Scotia ("BNS") Primary Savings account ***033

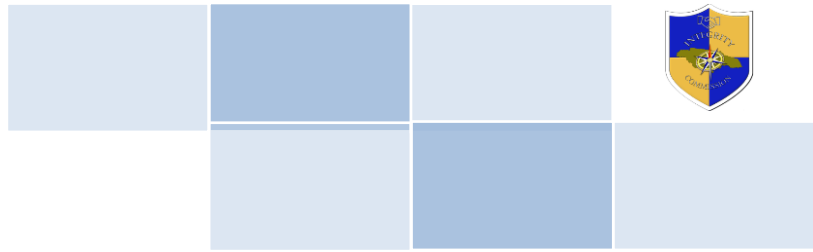
4.3.35 With respect to BNS Primary Savings account ***033, Mr. Zavia Mayne did not submit to the DoIC the requested information for the years 2018, 2019 and 2020. No supporting documentation related to this account was included in his statutory declarations for the referenced years. A letter



dated January 17, 2023, issued by BNS, was attached to Mr. Mayne's March 2022 statutory declaration. The letter provided details regarding BNS Building Society Saving account ***033 with a balance of \$195,051.16. A witness statement obtained from an authorised officer at BNS dated January 10, 2025, contained a list of accounts that were held in Mr. Mayne's name. This account was not among the list of accounts confirmed as being held by Mr. Mayne.

BNS Electronic Access Account ***701

4.3.36 With respect to BNS Electronic Access account ***701, Mr. Zavia Mayne did not submit to the DoIC the requested information for the year 2022. A letter dated January 17, 2023, issued by BNS, was attached to his March 2022 statutory declaration. The letter provided details regarding BNS Saving account ***701 with a balance of \$47,166.30. A witness statement obtained from an authorized officer at BNS which includes a list of accounts held in Mr. Mayne's name, identified him as a joint account holder on account ***701. The account was opened December 24, 1982.



BNS Scotia Plan Loan ***115

4.3.37 In relation to BNS Scotia Plan Loan *** 115, Mr. Mayne did not provide the information to the DoIC as requested. A letter dated January 17, 2023, issued by BNS, was attached to his March 2022 statutory declaration. The letter provided details regarding BNS Savings account ***115 which had a balance of \$7,392,826.64.

BNS Resident Mortgage Accounts

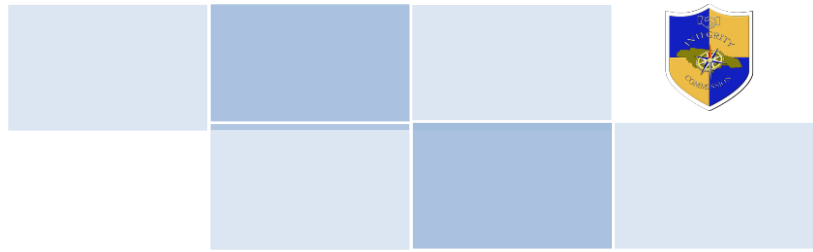
4.3.38 In relation Residential Mortgage accounts ***777 and ***271 for the year 2022, this information was not provided by Mr. Mayne to the DoIC as requested. Upon review of his statutory declaration for the year 2022, a letter dated January 17, 2023, issued by BNS, was attached. The letter outlines the information for each mortgage account as at December 31, 2022 to include the branch information, account numbers and account balances. The balance on account ***777 was stated as \$14,149,087.90 and account ***271 as \$21,977,331.76.

Mayberry Investment accounts

4.3.39 Mr. Mayne had declared an investment of two million dollar (\$2,000,000) in Mayberry Investments. However, he did not provide any supporting documentation regarding his Mayberry Investments (Managed Portfolio) accounts or Mayberry Investments (Cash/Current Account) account ***55

INTEGRITY COMMISSION

INVESTIGATIONS INTO ALLEGATIONS OF BREACHES OF THE ICA BY MEMBER OF PARLIAMENT FOR ST. ANN SOUTH WESTERN MR. ZAVIA MAYNE



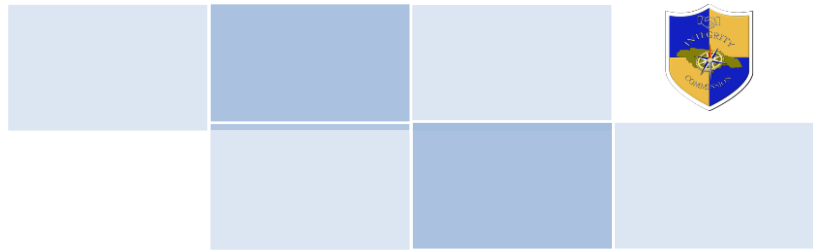
for the year 2022, as requested by the DoIC. Additionally, no information was submitted for Mayberry Investments (Mayberry USD Money Market) account ***34 for the specified period. Third party verification confirmed that Mr. Mayne is the owner of the mentioned accounts.

JMMB Accounts

4.3.40 Mr. Mayne was requested to provide information on JMMB accounts ***14, and ***60 to the DoIC, but he failed to provide same. Upon careful review of his statutory declaration, it was confirmed that Mr. Mayne did not declare these two accounts on any of his statutory declarations for the years 2018, 2019, 2020, 2021 and 2022, nor did he provide any attached document from JMMB in respect of these two accounts. Third party verification at JMMB Bank (Jamaica) and JMMB Securities Limited confirmed that Mr. Mayne is the owner of the mentioned accounts.

Cornerstone Merchant Bank

4.3.41 Mr. Mayne was requested to provide information on accounts held at Cornerstone Merchant Bank. He did not provide the information as requested by the DoIC. Accompanying Mr. Mayne's statutory declaration for 2022 was a document dated March 10, 2023, with information pertaining to five (5) joint Cornerstone accounts. The document detailed the account numbers, names on the accounts, types of accounts, balances, and the currencies involved. The opening date of these



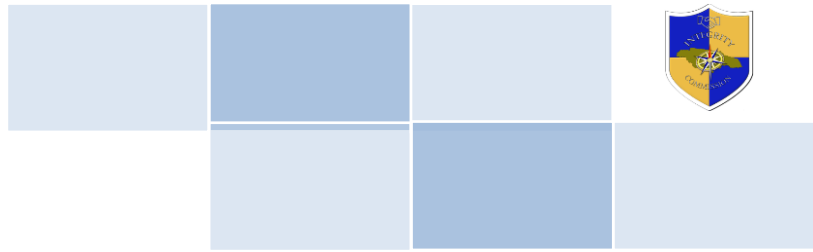
accounts were not included in the document as specifically requested. Third party verification at Cornerstone Merchant Bank confirmed that Mr. Mayne is the owner of the mentioned accounts.

Gross Income earned from rental properties

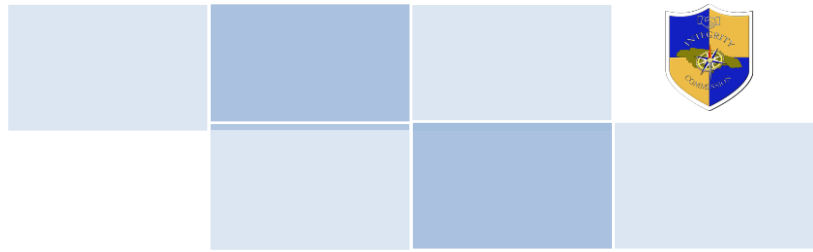
4.3.42 Mr. Mayne failed to provide the DoIC with the gross income earned from rental properties for the years 2021 and 2022 and evidence to support the source of income. A review of the statutory declaration revealed that Mr. Mayne had included an income of six million dollars (\$6,000,000.00) from rental properties on his 2021 statutory declaration. He however, did not include any income from rental properties in his 2022 statutory declaration. Further checks of his statutory declaration for 2022 revealed that Mr. Mayne had disposed of a property at Shop # 16 Springs Plaza for one hundred twenty million dollars (\$120,000,000.00). No supporting document was provided for the disposal of this property.

Gross salary/wages earned from Zavia Mayne and Company Law Firm

4.3.43 Mr. Mayne did not provide the information requested for gross salary/wages earned from Zavia Mayne and Company (Law Firm) for the years 2020, 2021 and 2022 as requested by the DoIC. A review of his statutory declarations revealed that for the years 2020, 2021 and 2022, Mr. Mayne had declared salary of two million dollars (\$2,000,000.00), for each of the stated years from Zavia Mayne and Co (Law Firm). However, he did

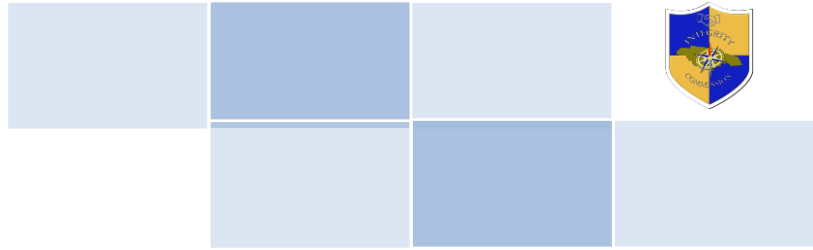


not provide any supporting document to substantiate this income with his statutory declarations.



4.4 Discussion of Findings

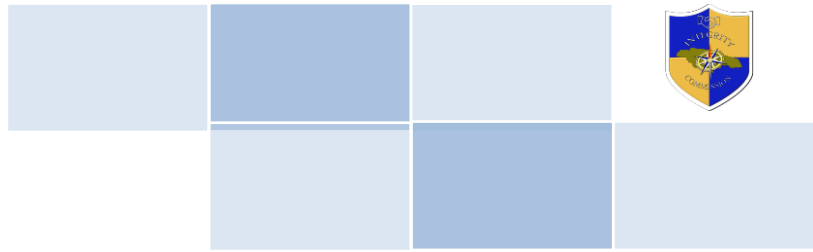
- 4.4.1 During the course of the investigation into the allegations against Mr. Mayne, all reasonable lines of enquiry were explored, evidential material was gathered and the statements of witnesses deemed necessary were collected/recorded.
- 4.4.2 The overarching objective of the Commission's investigation was to determine whether there is merit in the allegation that Mr. Mayne failed to provide information requested from him by the DoIC, in respect of his statutory declarations for the years 2018, 2019, 2020, 2021 and 2022 as required under the **ICA**.
- 4.4.3 For an offence to be committed under **section 43(1)(b)** of the **ICA**, it must be proven that: (1) the officer concerned, was, at the material time, required to file statutory declarations under the **ICA**; (2) the Commission is entitled to 'further information' in respect of same and the request for said information was lawfully made (in writing); (3) the concerned officer was aware of the request, more particularly, he received the DoIC's Notice in writing; (4) the obligation of the officer to provide information requested by the DoIC was not discharged; and (5) no reasonable cause was advanced, justifying the concerned officer's failure to comply with the requirement to provide the requested information.



4.4.4 In arriving at a position in the instant matter, the DI directed his mind to the following findings of fact:

- a) Mr. Mayne by virtue of his seat in the Parliament, was required, at the material time, to file statutory declarations with the Commission, which he did.
- b) The DoIC is empowered under **ICA** to, by Notice in writing, request further information from any declarant who submits their statutory declaration. A request for further information in respect of Mr. Mayne's statutory declarations was duly made.
- c) Having not complied with the DoIC's request for additional information, a **s.42(2)** Notice was served on Mr. Mayne. This Notice provided him with the opportunity to submit the requested information to the DoIC, and it outlined the legal grounds on which the Commission is authorized to seek further information regarding his statutory declarations.
- d) Mr. Mayne was non-compliant with a number of the DoIC's requests despite several attempts to secure his compliance.

Based on the foregoing, the DI finds in the circumstances, that a referral to the Director of Corruption Prosecution is justifiable.



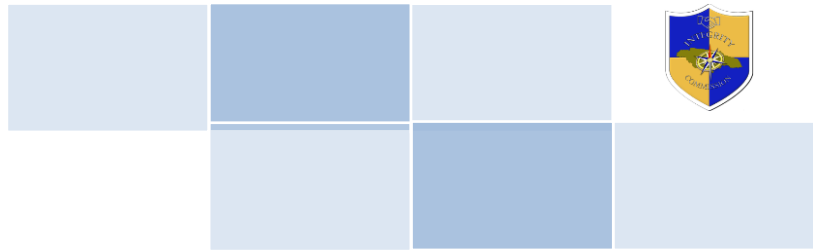
Chapter 5 – Conclusions and Recommendations

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. Mayne, was by virtue of being a Parliamentarian, legally obligated to file statutory declarations with the Commission for the years 2018, 2019, 2020, 2021 and 2022.

5.2.2 The DI further concludes that Mr. Mayne was lawfully requested to provide further information to the DoIC, in respect of his statutory declarations, and he was aware of the requests. Further, Mr. Mayne failed to provide a portion the requested information and his failure to do so contravenes **Section 43(1)(b)** of the *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.

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

Kevon A. Stephenson, J.P
Director of Investigation

July 14, 2025
Date