

Questions sent to [REDACTED] 3 February 2025 via email and by mail  
No response as of 18 February 2025

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**RESEARCH QUESTIONS**  
FOR

**IN RESPECT OF YOUR ROLE AS [REDACTED] TO THE BANKING  
INQUIRY (2014 – 2016)**

As noted in the introductory email, we are currently researching the banking industry before and after the financial crash 2008, the Banking Inquiry and in this context specifically the treatment of the Banking Inquiry Whistleblower, Ms XXXXXX on behalf of a production company. A number of matters have been brought to our attention.

We are very keen to understand the complexities of these matters generally and particularly from your legal perspective. To assist us in our research, we would appreciate your answers and insights on the following questions:

1. Please explain why your role as [REDACTED] to the Banking Inquiry has now been erased from your LinkedIn profile?
2. In February 2015, [REDACTED] approached you about concerns re inappropriate conflicts of interest regarding a member of the Expert Support Team. [REDACTED] states that an individual on the team investigating the Central Bank of Ireland's role in the Banking Crisis had close ties to the CBI and was attempting to influence the witness list.

In an email written by you to Lead / Senior Investigators and shared with us, we see that you supported [REDACTED] in writing and asked for this matter to be addressed. [REDACTED] says that despite your support for her concerns, no action was taken, and the Investigator remained on the Regulatory Team (investigating the Central Bank).

- Is that your understanding?

3. [REDACTED] has stated that you approached [REDACTED] Senior Investigator in her presence in the Dáil bar and asked him if you could second [REDACTED] on to your Legal Team, supporting the Inquiry as you were under-resourced and you believed [REDACTED] would add value, however, M [REDACTED] refused to release [REDACTED] from her role as an Investigator and indicated that he needed her on the Expert Support Team.

- Is this your understanding?

Continued

4. What is your understanding of the circumstances surrounding the various Investigators that departed from the Expert Support Team?
  - a. Were you aware that one Investigator departed as a result of [REDACTED] Protected Disclosures not being adequately addressed?

The Irish Times, 22 July 2015 even wrote about this Investigator's departure
5. What is your knowledge of the departure of [REDACTED] from the Expert Support Team?
6. Were you directly involved in ensuring that Investigators who were to be interviewed by [REDACTED] would receive €500 to seek external legal advice prior to the interviews?
7. Public records are clear that [REDACTED] did not interview the witnesses who supported [REDACTED]
  - a. Were you interviewed by [REDACTED]
  - b. Did he even ask to meet with you?
8. Were you aware that the official transcripts [REDACTED] interviews with [REDACTED] showed that he did not investigate the issues relating to conflicts of interest at all?
9. Were you aware that [REDACTED] stated that he was not permitted to have access to the declarations of interests?
10. Were you aware that [REDACTED] bragged that he had access to the Taoiseach's private bathroom?
11. Were you aware that the HR Manager for the Houses of the Oireachtas wrote to [REDACTED] in July 2024 asking [REDACTED] to return to the office to take responsibility for writing a key part of the Inquiry Report (the Bank Guarantee)?
12. Were you aware that [REDACTED] did not investigate [REDACTED] Protected Disclosures and instead tried to influence her to withdraw them?
  - Transcripts we have read show he was very assertive in trying to get her to withdraw all Protected Disclosures regarding the Central Bank and tried to mislead her on another?
  - Did [REDACTED], to your knowledge, receive instructions to cover up for the Central Bank in terms of concealing fraudulent activities of the Banks?

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13. When [REDACTED] Report was published and you were aware that it was fabricated and that the government press releases about [REDACTED] were fabricated, why did you not take any steps to correct the record given your obligation to the wider public interest?
14. Did you discuss the fabricated [REDACTED] Report and false Press Releases with any of your colleagues? If yes, who did you discuss these matters with?
15. Were you made aware that the former Governor of the Central Bank [REDACTED] met with [REDACTED] in October 2015 and deemed her Protected Disclosures to be credible?
16. When you were in situ on the Banking Inquiry, how much knowledge did you have in relation to the extent of the fraudulent practices that were being concealed by the Banking Inquiry?
17. Were you aware that the Irish banks were insolvent pre issuance of the Bank Guarantee and that the Central Bank was required to conceal its supervision of the liquidity / solvency position of the Banks? Are you aware that this matter is now openly discussed and is a matter of public record?
18. Were you aware during your tenure that many individuals providing written and oral testimony to the Banking Inquiry were knowingly providing false testimony or omitting swathes of relevant information?
19. Were you aware that Ulster Bank had fraudulently sold derivative products to trigger breaches of Loan to Value covenants in order to strip assets from customers?
  - Many lay litigants have active cases in the Irish and Northern Irish Courts at this time and in our opinion based on our research, it suggests that if [REDACTED] had actually researched the Central Bank's activities and its role in concealing the Ulster Banks' fraudulent activities, potentially 1000s of borrowers may have been in a position to retain their assets and some lives saved.

FYI - the article from The Times by Mr James Hurley in the following link lays out one of the frauds very simply.

<https://www.thetimes.com/article/natwest-fixed-rate-loan-scheme-for-companies-effectively-theft-kg2wr638j>

20. Have your colleagues in the Houses of the Oireachtas and/or OPLA shared information regarding [REDACTED] litigation? Have you participated in any meetings related to the litigation?

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21. Did you have any personal or professional conflicts of interest that you failed to disclose at the time you were **Legal Adviser** to the Banking Inquiry?

- Do you have any such conflicts of interest now that would prohibit you from investigating the Ulster bank fraud for example?

22. **Mr Charles Meenan** SC worked along side you at the Banking Inquiry and was then promoted to the High Court bench as was **Mr Allen** (then SC).

- Do you believe that **Mr Meenan** was wholly in the dark in relation to the level of fraudulent activities required to be concealed by the Banking Inquiry?
- Was he free from personal and professional conflicts of interest when he took up his position working with you or did he have long experience working with the Banks that were being investigated?

Your insights will be invaluable to our project, and we greatly appreciate your time and consideration.

Your right of reply is important to the production company, and we reserve the right to publish our queries and your response in conjunction with the release of the documentary and as mentioned in our cover note if you wish to appear on camera we will share that information with the team.

Thank you for your attention to this matter.