

QUESTIONS FOR THE STATE CLAIMS AGENCY PRESS OFFICE

PROVISION OF INSTRUCTIONS TO JOE O'MALLEY OF ██████████ SOLICITORS

1. ██████████ solicitors have confirmed in writing on two occasions that the SCA is issuing instructions in the above case to ██████████ solicitors, why then did ██████████ who is ██████████ of the SCA state that ██████████ did not know about the SCA's role in this case on **19 December 2024**?
2. Why did ██████████ require the Plaintiff to tell her which Solicitors were acting in the Proceedings, as that information would surely be logged in the SCA's internal system?
3. Why would ██████████ deliberately mislead the Plaintiff about the involvement of the SCA and state that they had no involvement if they were indeed issuing instructions?

QUERIES ABOUT THE SCA INSTRUCTING ██████████ SOLICITORS

4. If the SCA's role was/is to resolve claims on behalf of State authorities, as stated on its public website, why would the SCA have a vastly different role here, which includes the issuance of instructions / or signing off on a strategy perhaps arrived at by Hayes solicitors to issue a baseless threat of an injunction against the Plaintiff, which is a criminal breach of the Protected Disclosures Act 2014 (as amended)?
5. If the SCA is obliged by statute to manage delegated claims in such a manner as to ensure that the liability of the State authorities is contained at the lowest achievable level, precisely why then, according to the SCA have the above Proceedings been drawn out for so long – it is approaching the start of the tenth year since the events arose and the Plaintiff's Protected Disclosures have been substantiated?
6. Why is it that from the offer of mediation from the State authority in July 2019 to an actual mediation conference taking place on **16 May 2022**, did a period of 2 years and 10 months elapse if the SCA is tasked with reducing State liability?
7. Did the SCA in conjunction with ██████████ solicitors collude with the Plaintiff's lawyers to achieve these delays? [Note, the Plaintiff's former lawyers were discharged when they were found to have actively concealed supportive witnesses from the Plaintiff, concealed correspondence from ██████████ solicitors and repeatedly refused to follow the Plaintiff's instructions to set the case down for trial. The Plaintiff's solicitor denied meeting a supportive witness, but then magically remembered the meeting said witness when a sworn affidavit was produced by the witness outlining the events in question.]
8. The Plaintiff's former barrister, ██████████ SC warned her (verbally & in writing) about speaking with whistleblowers, blamed her for delaying her case when on the contrary she routinely asked for the case to be set down for trial and even became hostile when a

person indicated their support for the Plaintiff online as well as bullying her in the presence of a witness.

Was the SCA tasked with controlling the Plaintiff via Hayes solicitors in conjunction with the Plaintiff's lawyers?

9. Prior to the mediation, the Plaintiff was encouraged to accept that the fabricated [REDACTED] Report (from 9 years ago) about her would remain on the record, and this was a pre-condition to settling the Proceedings.

All parties in the room including the mediator were aware that the Report was fabricated.

All were aware that the former Governor of the Central Bank had deemed the Plaintiff's Protected Disclosures to be credible as well as certain disclosures having already been substantiated in 2015 and 2016.

All at the mediation conference were aware that the Plaintiff's Protected Disclosures were accurate and that disregarding them as [REDACTED] had done was for the purpose of concealing the fraudulent activities of Banks that the Inquiry Report was required to conceal.

No one has disputed this in 9 plus years, yet the Plaintiff continues to be penalized, victimized and retaliated against in this court process, culminating in a baseless threat of an injunction and now including repeated requests to her to provide details of her location emanating from a Circuit Court Judge and the NTMA which is intimidating and in her opinion constitutes further blatant harassment.

10. Why is it that, if the SCA is acting in this case, that it is choosing not seek to act fairly, ethically and sensitively according with its obligations in dealing with the Plaintiff who with her family has suffered devastating damages that have been documented by numerous professionals and as the Plaintiff has willingly attended appointments with the States' independent psychiatrist ([REDACTED] [REDACTED]) who expressed his shock in 2022 that this litigation was not resolved?
11. Mr [REDACTED] is now on notice that the mediation conference was conducted with a view to bribing the Plaintiff for her silence to provide ongoing cover for fraudulent activities of Irish Banks.

He is already on notice of the State lawyer's desire to investigate the Plaintiff's private life going back to 12 years before the Banking Inquiry and he has been put on notice of the State lawyer's egregious attempt to silence the Plaintiff (via the SCA according to Hayes solicitors) with the threat of an injunction (see further below).

12. The SCA's Annual Report states that where the SCA investigation concludes that the relevant State authority bears some or all liability, the SCA seeks to settle claims expeditiously and on fair and reasonable terms.
- a) Has the SCA conducted an investigation into this case?

- b) If it has done so, is it their common practice not to speak directly with the Plaintiff or is it possible that it has been wholly misled by the Defendant and Hayes solicitors?

13. If the SCA has conducted an investigation, please advise when it commenced and when it concluded.

It is important that the SCA is put on notice of the additional trauma suffered by the plaintiff upon learning that the investigators in the Banking Inquiry were simply used to give a veil of legitimacy to the Inquiry, while thousands of suicides had already occurred by then and there are risks of more suicides as the victims of the frauds are still in Irish courts with some in front of corrupt judges.

That the Plaintiff was recently egregiously threatened with an injunction by the SCA (according to Hayes solicitors) has seriously damaged the SCA's purported claim that they seek to act, fairly, ethically and sensitively.

14. Turning to any investigation that the SCA may have engaged in:

Was the SCA made aware that the General Counsel of the Central Bank, [REDACTED] threatened the Plaintiff while conducting her role and said that she had to verbally agree with him in advance any questions she wished to ask of the Central Bank of Ireland, before recording said questions in writing?

15. Was the SCA made aware that [REDACTED], the Plaintiff's colleague on the Banking Inquiry resigned in support of the Plaintiff and that this was covered up by the mainstream media?

16. Was the SCA made aware of the fact that the State is now attempting to interfere with said witness, Ms [REDACTED], and continues to withhold transcripts between Mr Senan Allen and the Plaintiff's colleagues who supported her?

17. Was the SCA made aware that several of the Plaintiff's Protected Disclosures were externally substantiated proving beyond doubt that the [REDACTED] Report was fabricated in order that the Inquiry Report could be produced on time and provide cover for myriad banking frauds, including that the banks were insolvent and engaging in frauds to shore up balance sheets before and after the issuance of the Bank Guarantee?

18. Was the SCA made aware that the HR Department continually wrote to the Plaintiff asking her to return to work between May and July 2015 and asked her to take responsibility for a key section of the Inquiry Report, further proving that Mr Allen's Report is fabricated?

19. Who from the SCA attended the mediation conference in this case on 16 May 2022.

We note that [REDACTED] was Head of Litigation at that time. Was she excluded or did she attend and then did the entire case later slipped her mind?

If [REDACTED] was excluded, please explain why.

20. Who, on behalf of the SCA issued the instruction to [REDACTED] solicitors with confirmation to the mediator on **16 May 2022** that the fabricated [REDACTED] Report about the Plaintiff was

required to remain on the official government record as a precondition to settling the Proceedings – bearing in mind all in the room knew it was fabricated?

21. The Plaintiff's brother who was in attendance will confirm that the mediator stated that the Plaintiff was treated scurrilously yet the mediator also told the Plaintiff in the presence of her brother that the position was that the fabricated [REDACTED] Report about her was to remain on the official government record indefinitely, even though everyone in the room knew it was fabricated.
 - a) If no one was in attendance for the SCA, please confirm?
 - b) If the SCA had no knowledge of the mediation conference, please confirm?
 - c) If the SCA participated in this, who was involved and could they provide a comment on the requirement to save the [REDACTED] Report?
22. Returning to call that the Plaintiff had on **19 December 2024** with [REDACTED],
 - a) Does the SCA believe that [REDACTED] came to the conclusion that she had somehow let down the State by telling the Plaintiff that the SCA was not involved in her case?
 - b) Was the internal SCA system to which [REDACTED] was referring, correct or incorrect?
23. If the SCA was/is instructing [REDACTED]'s solicitors,
 - a) Why would [REDACTED] not have been at the mediation conference?
 - b) Would it not be her role to have later advised [REDACTED] solicitors on the law regarding Protected Disclosures Act 2014, if Hayes solicitors was not familiar with applicable law?
24. Why would [REDACTED] be kept in the dark about the individuals at SCA that are involved in this case, particularly given the criminal culpability that arises from the issuance of instructions to baselessly threaten the Plaintiff with an injunction?
25. Did the SCA agree to baselessly threaten the Plaintiff with an injunction?
26. Did the SCA advise [REDACTED] SC to warn the Plaintiff re speaking with other whistleblowers?
27. Did the SCA advise [REDACTED] and the Plaintiff's lawyers not to take testimony from supportive witnesses?
28. Did the SCA advise [REDACTED] & [REDACTED] SC to delay the mediation until the issues regarding Ulster Bank were sorted in order that there could be an orderly exit from the Irish market following the destruction of the Irish SMEs?
29. Please confirm whether any individual at the SCA/NTMA has had any contact with [REDACTED]

██████████, Solicitor or any member of ██████████ in regard to his case, whether by phone, email, text or otherwise?

██████████ is the former Solicitor for the Plaintiff, who within a few days of briefing counsel in January 2024, abruptly withdrew from the litigation on contrived grounds (outlined in affidavit) and said she was unable to have a conversation with the Plaintiff about her withdrawal.

██████████ then returned the Plaintiff's file of papers to the Plaintiff's previous Solicitors were they remain and she did this without the knowledge consent or authority of the Plaintiff.

This was questioned in the High Court by Mr Justice ██████████ ("under what authority did ██████████ return the files").

- a) Was the SCA involved in ensuring that the Plaintiff's file was put out of reach?
- b) How many other times has the SCA potentially through the Law Society, with the threat of an Audit interfered in legal representation?

Our research and the plaintiff have informed us that numerous solicitors are being pressurized to withdraw from cases.

30. Rather than appear in the High Court to deal with the reasons for her withdrawal, ██████████ engaged a Solicitor and a Barrister and also sent two subordinates from her offices; actions which are highly unusual for a person seeking to come off record in a case.

██████████ refused to attend in the High Court and her Barrister then lied in the High Court in an attempt to discredit the Plaintiff.

██████████ and her staff members then began to discredit the Plaintiff to individuals known to the Plaintiff

- a) Has the SCA been involved in orchestrating these lies and character assassinations similar to what ██████████ did in his fabricated report?
- b) Why would ██████████ need to engage in such professional misconduct – surely it was not of her own volition?

██████████ even attended the plaintiff's father's funeral a few weeks earlier and even offered her a job in her practice in the fall of 2023.

31. The Plaintiff has been advised that ██████████ was encouraged to withdraw from the litigation by a representative of the State. We are trying to ascertain whether the SCA, NTMA, the Defendant or ██████████ solicitors had any involvement in threatening ██████████ to withdraw from the Proceedings.

██████████ and the other bodies will be separately approached.

It is worth noting that [REDACTED] has not denied that [REDACTED] “lost her independence”

32. Data Protection Officer of the NTMA

- a) Who does the Data Protection Officer of the NTMA report to?
- b) Why is the DPO requiring existing and previous postal addresses of the Plaintiff when this is not a requirement under GDPR unless there is a reasonable doubt about the Plaintiff’s identity?

33. From our research the Garda Síochána has now indicated that while the individuals’ names of the SCA officers issuing instructions to [REDACTED] solicitors are not required in order for the Plaintiff to file a criminal complaint and that a criminal complaint may be filed against the SCA, as a body corporate

Will you kindly confirm in writing the precise name(s) of the individual(s) at the SCA who is/are issuing instructions to [REDACTED] solicitors and/or signing off on strategy in these Proceedings, as it will save taxpayers’ funds if the Gardaí can interview the person(s) responsible rather than conducting a wider investigation and we can also contact them directly with questions?

34. Finally, is the SCA willing to confirm the total amount of taxpayers’ funds that have been incurred by the State to date in these Proceedings?

To the external legal representatives

[REDACTED]

and the internal legal representatives, members of OPLA of the Houses of the Oireachtas.

Other professionals

[REDACTED]

35. Is the SCA willing to confirm the total number of work hours spent by civil servants, whether in OPLA, the Houses of the Oireachtas, the SCA on matters associated with these Proceedings?

36. Please confirm whether the SCA has conducted any meetings with [REDACTED] (BL and SC) and / or [REDACTED] SC and/or Mr [REDACTED] SC in relation to the Proceedings.