

RESEARCH QUESTIONS
FOR

General Questions

1. Firstly, is it correct to say that you were aware that your Former Client's Protected Disclosures were accurate, that you had access to the official transcripts that showed that Senan Allen had not investigated the Protected Disclosures, you were therefore aware that the government press releases issued in 2015 were false and you were also aware that former Governor Honohan had met with your Former Client on 17 October 2015 and deemed her Protected Disclosures to be accurate?
2. Were you aware that [REDACTED] was attending fundraisers for FG and if not, why did you fail to carry out conflicts of interest check on behalf of your Former Client?
3. You indicated in writing that you were refusing to comply with your Former Client's exercise of her Article 15 GDPR rights - April 16, 2023 and updated April 17, 2023? Please comment. Why were (are) you reluctant to comply with your legal obligations to your Former Client?
4. When the Senior Counsel attempted to comply with GDPR, he inexplicably sent the file to your offices and not to your Former Client whose address was on all correspondence. Please comment on why you retained these files and did not send them on to your Former Client? Were you under the influence of the Senior Counsel?
5. The drafting and completion of your Former Client's Originating Summons took almost two (2) years to be prepared and filed – why?
6. Please comment on the reason why it took such an excessive amount of time. Were you aware that [REDACTED] was conflicted, delaying and interfering with your Former Client's pursuit of justice?
7. From our review of the correspondence, you were instructed multiple times in 2023 (April 16, 2023 for example). You refused on multiple occasions to follow your Former Client's instructions or ensure that correspondence your Former Client requested would be provided to her. Please comment.
8. When Mr Jonathan Sugarman reached out publicly to support your Former Client and wrote to the then Minister for Justice, why did Senior Counsel reprimand your Former Client following this development? We find this aspect baffling. Please comment.
9. Why did [REDACTED] SC say that Mr Sugarman was not entitled to write to "high-ranking officials"? This is another difficult development to digest. Please comment.
10. Did you ever take a statement from Mr Sugarman, given that his evidence supported your Former Client's Protected Disclosures? If not, why not? Were you being influenced by Senior Counsel? Please comment.

11. Why did you falsely describe your Former Client's case to Mr [REDACTED], a purported witness as a "defamation case"? We don't understand why you might wish to lie about the nature of your Former Client's cause of action? What were you trying to achieve? Please comment.
12. Did you take a statement from any of your Former Client's witnesses? Please comment.
13. Did [REDACTED] SC advise you not to take a statement from Mr [REDACTED] or Mr [REDACTED]? Please comment.
14. Why did you not disclose to your Former Client witnesses (Mr [REDACTED] in particular) who came forward to support your Former Client's Protected Disclosures and ask to meet your Former Client? Please comment.
15. Our research shows that a witness who attended the June 2, 2023 meeting with your Former Client in the offices of [REDACTED] SC stated vehemently that you lied over 10 times about meeting Mr [REDACTED] and even declined his invitation to refrain from answering the question, until you returned to your office to check your files. Please comment.
16. Why did you only admit to meeting Mr [REDACTED] after he produced a **sworn affidavit**, detailing the date of his phone call and meeting with you and the topics discussed, including how he could support your Former Client with evidence? Please comment.
17. Why did you later then misrepresent why Mr [REDACTED] came to meet with you despite the content of the sworn affidavit – you indicated that he was looking for representation when he was not?
18. Did [REDACTED] SC actually instruct you not to disclose the fact that witnesses had contacted you in support of your Former Client? If so, why did you think that was the case?
19. Did you contact any willing witness and take their testimony after the October 9, 2022 meeting? Please comment.
20. Your Former Client says that you continually alluded to taking testimony from former TD, Joe Higgins but over the course of eight (8) years, you refused to do so. Why? Were you under the influence of [REDACTED] SC in this regard?
21. [REDACTED] SC also alluded to getting witness statements from Frank Browne and Tom O'Connell (former Central Bank employees) but those statements that he suggested should be taken also for reasons unknown did not materialise either. Perhaps you might explain why?
22. Based on the questions above and your own review, given the passage of time would you agree with the statement below, which is an extract from communication sent by [REDACTED], Solicitors to your Former Client on 12 January 2025 at approx. 6:50pm following her review of your Former Client's files.

"In relation to the contacting of witnesses, I agree your former Solicitor was less than proactive and his interactions could have, and should have, been more probative in respect of procuring useful witness statements". Please comment.

23. The following is another extract from communication from [REDACTED] Solicitor to your Former Client on 12 January 2025 at approx. 6:50pm.

“Turning to what I have digested from your files, there is no question whatsoever that you were entirely misled and misinformed by your former Solicitor regarding the letter dated the 15th December 2022 setting out the details of the appointment to attend the Defendant’s vocational assessor, Mr Leonard last April”

24. Please comment on [REDACTED] statement. For what reasons would you engage in misleading your Former Client in respect of a rather trivial issue such as an appointment?

25. We have also reviewed an email from your Former Client’s partner dated February 14, 2023 also around “*bullying tactics*” that he observed [REDACTED] SC engaging in during an online video call on February 10, 2023. It is highly unusual for a witness to a legal strategy meeting to take such a significant step; to write an email out of concern. Was this because your Former Client was unwilling to be put through further years of manipulation by her legal team when all the evidence existed to support her case and to restore her reputation?

26. Why was Senior Counsel so particularly intent on protecting the reputation of Mr Justice Senan Allen which is evidenced from the notes of a meeting in October 2022? In this meeting, he said repeatedly that your Former Client could not bring in Senan Allen into the case, even though all were on notice that he had drafted a fabricated report about her. If your Former Client’s reputation was to be restored per her instructions to you, the natural fall-out would be that Senan Allen’s reputation would be destroyed. Please comment. Why so important to leave Allen’s reputation unsullied – was this due to his activities in the Courts to assist various Irish Banks?

27. In another extraordinary developments, your Former Client’s partner wrote a lengthy memo to you, Senior Counsel and Junior Counsel after the June 2, 2023 meeting and he was quite scathing in his remarks about how the legal team was treating your Former Client. He also laid out some observations, including your falsehoods about meeting Mr [REDACTED] on how you “never looked for leverage to advance the case”. He provided you with an opportunity to correct any misstatements and or schedule a call to clarify any of the facts referenced. There is no evidence that you corrected anything that he had written and therefore we must accept that you could not counter the statements made by him. Please confirm.

28. In the June 2, 2023 meeting in which you lied about meeting Mr [REDACTED] ten plus times, you referred to your Former Client, as read in her notes, as a “*supposed solicitor*”. Please comment on what might have driven you to describe your Former Client and a senior legal professional in this manner, someone who had impeccable credentials until the fabricated Senan Allen Report (about which you were wholly on notice was fabricated) was drafted?

29. Did Counsel advise you to send someone from your offices to court last summer when [REDACTED] request to come off record was being heard because you were concerned that your Former Client would outline all the facts in relation to your falsehoods, the deliberate misleading of your Former Client, failing to take witness statements, turning witnesses away, causing interminable delays to proceedings etc?

30. Your Former Client did indeed swear an affidavit outlining the various issues that had arisen during your representation of her and it has not been challenged. Please comment.

31. We find it very difficult to comprehend why [REDACTED] would have returned the file of papers to a firm of Solicitors engaged in such activities and that she herself had criticised? Were you on notice that [REDACTED] was being influenced in some manner to return the file to your offices?

32. Having reviewed the official transcripts between your Former Client and Mr Justice Senan Allen, it is indeed the case that the government press releases were / are entirely false and it is also the case that, as Governor Honohan stated, your Former Client's Protected Disclosures were accurate. Why then was your firm so reluctant to act in your Former Client's best interests and are you willing to say who was influencing you?

33. Finally, the Banking Inquiry concealed *inter alia* that the Banks (i) were insolvent (ii) suffered massive liquidity shortfalls that in large part continue to exist (iii) were engaged in false accounting supported by their auditors (iv) were engaged in manipulating interest rates (iv) were shaking down loyal customers to seize assets in order to shore up crippled balance sheets through unlawfully engineering defaults. The effects are ongoing and are not victimless. Why as a Solicitor with duties to the wider public interest would you wish to conspire to conceal this from the general Irish public by frustrating your own client's pursuit of justice?