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Ms Elaine Gunn
The Secretary General
Houses of the Oireachtas Service
Leinster House
Kildare Street
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Sent by email: elaine.gunn@oireachtas.ie

November 3, 1025

**Re: Your Role as Inquiry Coordinator of Irish Banking Inquiry
Litigation by Ms Lorraine Morris - v - The Houses of the Oireachtas
Commission**

Dear Secretary General

In recent years we have been researching various cases of bank and other frauds in Ireland in preparation for an upcoming documentary and such I write regarding your service to the State as the Inquiry Coordinator of the Joint Committee of Inquiry into the Banking Crisis (2014–2016) and ongoing matters pertaining to the Inquiry's administration, related reports, and consequent litigation involving Ms Lorraine Morris who is contesting the veracity of the Senan Allen Report.

Appointment and Conflicts of Interest

1. Could you detail the process by which you were appointed as Inquiry Coordinator, including nominating or approving bodies, procedures followed, and any conflict-of-interest declarations made or recorded?
2. Did you have any personal or professional connections with members of the Expert Support Team, the Joint Committee or Participants in the Inquiry and if so, were these disclosed and assessed for impact on the Inquiry's impartiality?

Reporting about Ms Morris' Protected Disclosures

3. Were you aware that the Inquiry's Legal Adviser supported Ms Morris's concerns about conflicts of interest (in writing)?

4. If so, what steps did you take following this awareness?
5. Were you informed of the substantiation of some of Ms Morris's Protected Disclosures and of former Governor Patrick Honohan's having affirmed their credibility and alluded to the inadequate Banking Inquiry in his book? If so, how did this impact your view of the Allen Report?

The Gunn Report – May 2015

5. Under whose direction was the Gunn Report authored by you in May 2015?
6. Who drafted its terms of reference and who chose the interviewees?
7. Why was Ms Morris not advised that you were conducting a review?
8. Why were Ms Morris, Ms Caulfield and Mr Corcoran not interviewed by you (at a minimum) given the matters that were under examination?
9. Why was a false assertion about Ms Morris having failed to attend at a meeting included in the Gunn Report by you?
10. When Ms Morris corrected the record, why was this left untouched and why did Senan Allen disregard this in his review?
11. Was this the first coordinated attempt by the Oireachtas Service to falsely discredit Ms Morris?
12. Did you include this statement in #9 of your own volition or under direction of Mr Peter Finnegan, your superior at the time?

Expert Support Team – Members Departing and Your Sick Leave

13. Could you please clarify the circumstances and impact of your 2015 stress-related sick leave, while acting as Inquiry Co-ordinator that according to Ms Morris related to her departure (27 April 2015); the departure of MX XXXXX XXXXXXXXXXXX (13 May 2015); and the expressed desire of Mr XXXXXXX XXXXXXXXXXXX to depart the Inquiry thereafter?
14. Mr XXXXXXXXX has said that you pleaded with him to remain in his post or it would "collapse the Inquiry" - is this a correct assertion?
15. How many members of the Expert Support Team departed the Investigation Team during the tenure of the Inquiry?
16. Are you able to state the Stream upon which they worked, the dates of their departure and their reasons for departure?

17. Did any members of the Expert Support Team depart to go to work with any of the Participants in the Inquiry?
18. How many more members of the Expert Support Team needed to be hired well into the tenure of the Inquiry to replace the departing Expert Support Team members?
19. Who in the Oireachtas Service took the decision to use the **names and thereby the credentials** of the departed members of the Expert Support Team in the final Inquiry Report?

Unlawful Threats Against Ms Morris

20. Were you aware of unlawful threats, coercive and retaliatory tactics used against Ms Morris (aside from the Allen Report itself and the false assertion made in the Gunn Report)?
21. Were you aware of the unlawful threats to deprive Ms Morris of her salary?
22. Were you aware of the threats levelled against Ms Morris related to a potential breach of the Official Secrets Act when she was co-operating with Mr Senan Allen?
23. Were you aware of the injunction threats made against Ms Morris in November 2024 when she deliberately breached the terms of the mediation agreement on the basis that the mediation was invoked with a view to perpetuating the false narrative of the Senan Allen Report and therefore concealing the ongoing fraudulent activities of Irish banks?
24. Were you aware of the ongoing attempts to silence and/or discredit Ms Morris?

The Senan Allen Report

25. Were you consulted about or did you review the Allen Report prior to publication?
26. Did you ever review the official transcripts of Ms Morris's interviews with Allen or indeed any other interview transcripts?
27. Are you aware that these official transcripts between Ms Morris and Allen contradict official government press statements that place reliance on the Allen Report when in reality the Allen Report contains fabrications about Ms Morris?
28. If so, what corrective actions do you propose? If you are unaware of the contradictions referenced in the last bullet, what do you propose to do now to ensure the official narrative is corrected?

Litigation and Mediation

29. Have you reviewed or been made aware of Mr Peter Finnegan's Affidavit of Verification denying any retaliation by the Oireachtas Service against Ms Morris, despite extensive documentary evidence to the contrary? A copy of examples of this retaliation experienced by Ms Morris was shared in correspondence with the Ceann Comhairle and Leas Ceann Comhairle on October 17, 2025 or seven days before the press release announcing your appointment and it can be seen on our website at www.irldefrauded.com/research.

30. Were you a party to the strategic decision that this obviously false Affidavit would also be concealed from Ms Morris?

31. Were you involved in or made aware of the May 2022 mediation, including the shielding of the identities of the 14 individuals in attendance for the Oireachtas Service?

32. Were you privy to any strategy discussions around perpetuating the false narrative around the Allen Report?

33. Why was mediation proposed by the Oireachtas Service if it stood over the veracity of the Allen Report?

34. Who authorised the process?

Expenditure and Litigation Management

35. Please provide detailed records of all public funds expended by the Houses of the Oireachtas Service and/or the State Claims Agency in legally defending or otherwise managing Ms. Morris's allegations.

36. Who is responsible for directing the litigation strategy, and how has compliance with Irish State litigation principles been ensured?

37. Has an independent audit or review assessed whether litigation costs and strategy were proportionate, transparent, and remotely in the interest of the Irish public?

38. Were all alternatives fully considered to minimize public expenditure and reputational risk?

Compliance with Irish State Litigation Principles

39. Are you familiar with Irish State litigation principles emphasizing fairness, transparency, fiscal responsibility, and proportionality?

40. Do you believe litigation concerning Ms Morris complied fully with these principles?

41. If breaches of the principles have occurred, what remedial steps have been or will be taken by you as Secretary General?

42. Have these issues been reported to parliamentary or oversight bodies? If so, please elaborate.

Request for Official Transcripts

43. I formally request the complete, unredacted official transcripts of Ms Morris's interviews with Allen, as it appears that these transcripts contain material evidence relevant to assessing the accuracy of the Allen Report.

June 2025 Meeting with Ms Morris

44. Do you recall your June 2025 unexpected encounter with Ms Morris at Leinster House while she attended an event as a guest of Senator Tom Clonan?

45. Do you recall Ms Morris asking you if you were aware of the extent of the matters that had been concealed by the Irish Banking Inquiry?

46. Ms Morris will say that she advised you of the matters related to the fraudulent activities of banks in Ireland and the related social harm, including thousands of suicides. Do you recall?

47. Ms Morris will say that in response, you simply wished Ms Morris "the very best". Are you in a position to explain your response to Ms Morris' references to the Inquiry's concealments and the related devastating social harm?

48. If you did not know or did not believe Ms Morris, did you seek any clarification or further investigation into Ms Morris's assertions related to the thousands of suicides attributed to banking misconduct or did you simply know the assertions to be true and take no action?

49. If you are unaware of the claims of cover up, would you be willing to accept a meeting now to learn about the fraudulent activities in order to protect Irish citizens from future banking frauds?

50. Did you take any action or make any formal reports relating to the claims and concerns Ms Morris raised about the extent of the concealment of the fraudulent activities, by means of issuing an inadequate Inquiry Report?

51. Did the unexpected encounter with Ms Morris influence any subsequent decisions of any kind, policies, or communication strategies concerning the Inquiry, Ms Morris's claims and the Allen Report?

52. Were you briefed by any party or official regarding the implications of the encounter with Ms Morris or indeed the statements Ms Morris made to you?

53. Ms Morris said to you that she was in attendance with Senator Clonan and still

dealing with the consequences of the fabricated Allen Report an entire decade later. Did you perceive any expectation arising from this meeting, either formal or informal?

54. Did the encounter with Ms Morris impact your assessment of the validity of the Allen Report or the broader public narrative, considering the Allen Report remains publicly available on the Oireachtas website and the related government press releases remain unchallenged?

Given the gravity and public interest in these matters, I would value your detailed written response addressing all questions herein. The transparency and probity of public administration demand clear and comprehensive accountability.

If you would like to go on camera to address the questions we have raised, we agree to pass your name on to the documentary team who will make the final decision on who appears on camera.

Yours sincerely,

Martin O'Cianain