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November 3, 2025

Mr Joe O’Malley
Managing Partner
Hayes Solicitors LLP
Lavery House
Earlsfort Terrace
Dublin D02 T625
Ireland

cc: All Partners at Hayes Solicitors LLP

Re: Your Clients: Houses of the Oireachtas Commission and / or the State Claims Agency

Response to your letter dated October 22, 2025

Dear Mr O’Malley

We acknowledge receipt of your **one-line response dated October 22, 2025** which has now been published on our website.

As we progress our investigation for the documentary, we have found that Hayes Solicitors has received over €10 million in Irish taxpayers’ funds between 2021 and 2022 alone, with no publicly available information in regard to funds received by your firm between 2022 to the present date.

In regard to the case of Ms Morris, our research certainly demonstrates that public monies are being used to assist your clients in conceal banking frauds by Irish banks against Irish citizens. These frauds are ongoing.

From our detailed research, it appears that a very sizeable portion of State funds has been employed by Hayes Solicitors and used in this case:

- (i) to actively suppress credible evidence about serious banking misconduct;
- (ii) to file a meritless Defence in the High Court;
- (iii) to file a false affidavit sworn by the Dail Clerk, Mr. Peter Finnegan to accompany the Defence;
- (iv) to perpetuate the false Senan Allen Report in an effort to lend credibility to the whitewash (Banking) Inquiry Report in 2016 (not fit for purpose according to many in the media);
- (v) to actively mislead an Irish Superior Court;
- (vi) to conduct a mediation in bad faith that was controlled by Hayes Solicitors and not the mediator;
- (vii) to facilitate the issuance of criminal threats against Ms Morris in breach of the Protected Disclosures Act 2014;
- (viii) to improperly withhold information on the name of the individual(s) who authorized the issuance of those criminal threats, whether emanating from the Houses of the Oireachtas or the State Claims Agency or advised by Hayes Solicitors as a strategy to unlawfully employ against Ms Morris;

It also appears that Hayes Solicitors has, in bad faith, also choreographed a fake mediation in an effort to perpetuate the falsehoods about Ms Morris contained in the Senan Allen Report. Instead of resolving Ms Morris' litigation in good faith – when two of her protected disclosures had already been externally substantiated in 2015, prior to her initiating proceedings and with the former Governor of the Central Bank of Ireland having deemed her disclosures credible, Hayes Solicitors instead deliberately and actively engaged in assisting the State in propping up the fabricated Allen Report, with a view to protecting powerful interests, but to the very significant detriment of Irish citizens, who incredulously are discharging the fees of your firm.

When asked by us to account for your actions, Hayes Solicitors have replied with one sentence, stating “*all allegations are refuted, and we will not engage*”.

Hayes Solicitors' response, via you as Managing Partner, speaks volumes and is a masterclass in evasion from a law firm long-funded by Irish taxpayers, taxpayers who are unaware that the law firm they are funding is doing so in an effort to perpetuate damaging falsehoods that ultimately serve to sanitise the Inquiry Report published in 2016.

Would Hayes Solicitors (before we direct the submission of a Freedom of Information request) be willing to advise us how much you have received (including billed but yet paid) from Irish taxpayers from 2015 to date, to assist the Irish State in perpetuating this false narrative?

Hayes Solicitors have been given ample opportunity to correct the record and to offer an alternative narrative, backed by cogent evidence. Instead, Mr O'Malley, you have confirmed it: by issuing a blanket denial in place of any accountability, **Hayes Solicitors, based on our extensive research have absolutely no factual defense to the detailed matters we have raised.**

This response will be published on our website with appropriate redactions (related to the names of the individuals who have provided references for Ms Morris in regard to her prior work with Bank of Ireland only – in the likely event that these senior legal professionals will suffer retaliation by association, a real concern for Ms Morris).

Senan Allen Review – the Review that Never Happened

Mr Senan Allen – then SC, the Houses of the Oireachtas’ handpicked “*independent reviewer*” admitted in his own words in official transcripts (that we have carefully reviewed) that:

- He did not interview corroborating witnesses,
- Nor did he investigate the detailed protected disclosures related to the Central Bank of Ireland,
- Nor did he investigate inappropriate conflicts of interest.

Joint Committee Member, **Senator Marc MacSharry**, confirmed these omissions in writing to his fellow Members of the Joint Committee on 8 September 2015. We have published this correspondence on our website at www.irldefrauded.com/research.

Allen failed to interview a member of the Expert Support Team who resigned in solidarity with Ms Morris due to her concerns over the Inquiry's management.

- Allen deliberately did not engage with witnesses who would corroborate the protected disclosures, including those related to withheld and heavily redacted documentation from the Central Bank.
- In his own statements, Allen confirmed he did not investigate Ms Morris’ significant concerns about conflicts of interest (the same concerns shared in writing by the Legal Adviser to the Inquiry, Ms Cathy Egan), despite these being central to Ms Morris’ disclosures.

Note: Ms Egan received her own set of questions on 3 February 2025 that can be viewed on www.irldefrauded.com/research

All of the above renders the Allen Report **fundamentally flawed** and the government press releases issued on foot of the Allen Report as false. No one yet has publicly challenged the matter of the many statements around the false government press releases, yet Hayes Solicitors are refuting all allegations in correspondence dated October 22, 2025 in relation to research for a documentary.

For clarification, are Hayes Solicitors asserting that the government press releases issued in 2015 are truthful? If so, why is your client or clients not challenging Ms Morris for publicly making false statements?

Allen’s focus, as evidenced by transcripts carefully reviewed by us, was not on investigation, but on pressuring Ms Morris to withdraw her protected disclosures, repeating questions like “*will you withdraw your report?*” and making threatening remarks such as:

"if I had any power I would have you in the attic long ago."

Such language employed by Allen is wholly incompatible with independence or appropriateness, yet Hayes Solicitors actively supported this by assisting its clients in perpetuating a false narrative, using taxpayers' funds.

Furthermore, what we view as Allen's personal attacks on Ms Morris, including baseless claims about Ms Morris' prior career at Bank of Ireland - recorded in transcripts as referencing Ms Morris having left,

"the avian flu behind her"

at that organization - is beneath the standard of any quasi-judicial decorum, whereby Allen trivialises serious protected disclosures relating to serious banking and regulatory misconduct on a large scale and instead casts an experienced solicitor with an unimpeachable record in derisive, gender-coded language.

Had Allen carried out even the most basic element of due diligence, speaking to those who actually worked with Ms Morris, his so-called "review" would have collapsed under the weight of contrary evidence. What Allen dismissed with the extraordinary accusation that Ms Morris had "*left the avian flu behind her*" in a prior role, is, in fact, the profile of a lawyer who consistently disinfected corruption, not one who spread it. Allen's extraordinary statement collapses into exactly what it was: an abhorrent smear deployed to undermine a protected discloser, whose honesty and integrity was deeply inconvenient to those in power.

We have uncovered further evidence through research that shows that two of Ms Morris's former colleagues in the Bank of Ireland Group, both senior legal professionals of unimpeachable standing are on record attesting to Ms Morris' commercial-legal competence, integrity, independence and ethical instincts.

Extracts from their references, copied below- written long before this litigation and beyond the reach of any political influence - expose as a complete fiction the false caricature that Allen attempted to construct, all in an effort to assist in concealing serious banking misconduct in Ireland that is ongoing.

False Affidavit, False Pleading

The sworn affidavit of Dail Clerk Peter Finnegan (2019) contains statements proven to be false. Despite two of Ms Morris' protected disclosures having been externally substantiated in 2015, Hayes solicitors had no difficulty filing and maintaining the false pleading and the false affidavit in the High Court, despite documentary evidence to the contrary **and all at the expense of the Irish public.**

Ms Morris' legal team concealed the affidavit from her, demonstrating their role in assisting in the perpetuation of falsehoods. Information related to the false affidavit has now been shared

with both the Ceann Comhairle and Leas Ceann Comhairle with a request for the suspension of the Dail Clerk while a review takes place. However, now that Mr Finnegan has departed from his role, a question must be asked did Mr Finnegan share the questions we shared with him via email on February 17, 2025 (and via regular mail) before deciding to step down.

We will shortly be sending a list of questions to the new Dail Clerk, Ms Elaine Gunn, as our research shows that Ms Gunn, the Inquiry Coordinator also created a false narrative about Ms Morris in a report authored prior to her taking four weeks leave for health reasons.

We understand that Ms Gunn's leave related to the stresses and strains surrounding Ms Morris' and Ms Caulfield' departure, compounded by another Member of the Expert Support Team expressing a wish to depart due to the multiple irregularities related to how the inquiry was being managed.

In any event, it appears from research that the filing of the false pleading and affidavit by Hayes Solicitors' was implemented simply to prolong proceedings and to intentionally mislead the High Court, pure and simple in our opinion and at the tax payers expense.

The “Good-Faith” Mediation That Wasn’t

As referenced earlier, how can Hayes Solicitors make a statement that you “refute” our statements of fact that are based on solid evidence and research? The mediation was delayed for thirty months, while the banking frauds (swaps and mortgage frauds) now uncovered continued to be perpetuated against Irish citizens.

Mr John Rogers SC proposed Mr Dermot Gleeson, SC as a potential mediator – the former Chairman of AIB plc who had given evidence to the Banking Inquiry. Why?

There is no publicly available evidence that Mr Gleeson has ever run a mediation practice. Ms Morris will say that the evidence provided by Gleeson to the Joint Committee was false and this has been openly discussed since in Irish parliamentary committee meetings. Did you have any discussions with Mr Rogers about proposing Mr Gleeson or was he proposed by your clients in the first instance?

According to the extensive documentation that we have reviewed, the mediation was choreographed by Hayes Solicitors, rather than planned and mediated by Mr O'Donnell. It was never intended to resolve anything, was not conducted in good faith and no decision maker was there with any authority to resolve it. The identities of all those present were shielded from Ms Morris. Why?

Hayes Solicitors carefully coordinated a last-minute position paper that was riddled with provable inaccuracies. It was a prop and not a good-faith submission, (to continue the **Delay, Deny and Destroy** policy at Irish taxpayers' expense as described in the Irish Times, May 13, 2025) as detailed in our October 17, 2025 letter and attachment.

To refresh your memory, below are some examples of fact from our October 17 letter, based on our research of numerous documents, including:

False Statement No 1:

“The Plaintiff elected not to challenge the Allen Report and/or the findings made therein (whether by way of judicial review or otherwise)” (#5):

However, correspondence that we have reviewed dated November 25, 2015 clearly shows the Allen Report was indeed strongly disputed, and it was done so comprehensively by Ms Morris herself, with oversight and sign off by Mr John Rogers SC, who was deftly positioned to ensure that Ms Morris did not pursue judicial review as it might interfere with the planned and ongoing asset-stripping of citizens by Irish banks.

Furthermore, we have reviewed multiple letters in which Ms Morris’ solicitor requested that the fabricated Allen Report be removed from the Oireachtas website. The fact that Ms Morris was unaware that her own lawyers were compromised in our opinion, does not transform Hayes Solicitors’ false statement into a truthful one.

False Claim No 2:

Hayes Solicitors Claim that Allen conducted a Thorough Investigation (#5):

This is false. Two of Ms Morris’ Protected Disclosures were externally substantiated prior to her initiating proceedings, rendering Allen’s Report a work of fiction. Allen had concluded “no substance whatsoever” yet he also admitted to not interviewing corroborative witnesses, not investigating conflicts of interest and not conducting any investigation into the inappropriate withholding and redaction of Central Bank evidence. MacSharry’s email corroborates this fabrication.

False Claim No 3:

That Ms Morris was not Inappropriately Identified (#19):

The Allen Report identified Ms Morris as a female qualified solicitor—the only such professional on the team—making her immediately identifiable. Strangers approached her post-publication, and other legal colleagues identified her based upon it. One Senior Counsel told Ms Morris that his colleague, Richard Kean SC had divulged her identity to him. Mr Kean SC also identified as a friend of Mr Justice Senan Allen and he confirmed that he knew that Ms Morris’ disclosures were accurate. If Ms Morris was not identifiable, perhaps Hayes Solicitors might explain how these approaches to Ms Morris came about?

False Claims No 4:

Good Faith Attendance (#6, #10):

Your client(s) attended not in good faith to resolve the dispute but to delay it further, using mediation as a mechanism of covert discovery, perpetuating the Allen Report to conceal ongoing banking frauds with fourteen people in attendance being remunerated by the State.

The mediator himself called Allen's treatment of Ms Morris “scurrilous” per Ms Morris and her brother's witness account - yet curiously he was wedded to propping up the false Senan Allen Report, no doubt due to his compromised position with close family ties to the Irish judiciary.

False Claim No 5:

Independence of Allen (#16, #26):

Allen was clearly not independent, as his conflicts and admissions show; no genuine investigation occurred, and we believe Ms Morris is correct in her assertion that detriment stemmed directly from the Allen Report's publication.

Critically, evidence from correspondence that we have reviewed, and accounts shows that Hayes Solicitors, not Mr O'Donnell controlled the mediation. Hayes Solicitors dictated proceedings, controlled timings and submitted a position paper laden with falsehoods, allowing no response time and prioritizing the unlawful suppression of legitimate protected disclosures over resolving the dispute, all in breach of the Protected Disclosures Act 2014.

This “mediation in name only” refutes any notion of good faith or appropriateness. Every line of it fell apart under scrutiny. The mediator was informed that certain of Ms Morris’ disclosures were already substantiated and that the former Central Bank of Ireland Governor (Patrick Honohan) had found them all to be credible – therefore once he became aware that your clients wished to sustain a false narrative, he should have withdrawn rather than participate in activities that would be damaging to the wider public interest and against his own professional duties and obligations.

What Hayes Solicitors are calling mediation, the record calls a managed deception at the exorbitant expense of Irish taxpayers, with apparently fourteen people in attendance for your client(s).

Who Was (is) Your Client — the Oireachtas or the State Claims Agency?

A letter emanating from Hayes Solicitors in late 2024 named the State Claims Agency (SCA) as providing instructions to you.

When Ms Morris sought to verify this, the SCA denied any involvement. Despite the Head of Litigation at the SCA claiming no knowledge of the case, Hayes Solicitors doubled down and repeated that SCA was indeed your client. That contradiction remains unexplained, because it cannot be explained. It was again carefully choreographed to evade culpability for the criminal offences engaged in by individuals who had signed off on threatening Ms Morris.

Sustained Retaliation Against Ms Morris in Breach of Protected Disclosures Act 2014

Mr Allen's Report, every unreasonable delay, baseless threat, baseless cost warning, filing of meritless pleadings and the false affidavit appear to be part of a coordinated campaign to break Ms Morris - from unlawful injunction threats later retracted, to interference with her legal representatives as well as veiled attacks suggesting investigation of her private life, warranting correspondence from Ms Morris' family members.

Hayes Solicitors has actively supported its clients by engaging in the weaponization of the court process - textbook retaliation in breach of the Protected Disclosures Act 2014.

The Record Will Stand Without Hayes Solicitors

Hayes Solicitors may have refused to engage in this process, via your own telling one line response, but following our review of the official transcripts, the correspondence, the pleadings and the affidavits – they do not lie.

Neither do the harrowing testimonies of the thousands of victims of the banking frauds covered up with the assistance of Mr Justice Allen, with Hayes Solicitors actively assisting in concealing for over a decade.

We continue to conduct research and take testimonies from the victims of swap, mortgage and other banking frauds in Ireland. It is our intention to publish all in full, so that the Irish public will be on notice that their own funds were being diverted to Hayes Solicitors to assist in the concealment of these egregious frauds.

If you could provide clarification on the government press releases, it would be appreciated as they remain intact with the support of mainstream media and from our research, there is no doubt that they constitute disinformation.

Yours sincerely

Martin O'Cianain

References Emanating from Two Senior Professionals in the Bank of Ireland Group

XXXXXXXX XXXXXXXX

then Head of Legal, Corporate Banking, Bank of Ireland Group

Now XXXXX, XXXXXX & XXXXXX LLP; Author OXXXXXXXXXXXXXXXXXXXXX

“I have known Lorraine Morris since 2001 when we were colleagues within the Capital Markets division of the Bank of Ireland Group.

At the time, Lorraine was Head of Legal at Global Markets while I was Head of Legal at Corporate Banking.

I respect Lorraine’s character enormously, together with her unerring instinct to take the right course when a sensitive legal or ethical issue presents. I trust Lorraine completely and, based on my extensive dealings with her over more than a decade, believe that her honesty and truthfulness are beyond doubt.”

XXXXXXXX XXXXXXXX, SC

Senior Counsel and Mediator - Specialist in Banking, Finance, Administrative and Professional-negligence law

Now a Member of XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX

“I have known Lorraine Morris for over ten years ... Among her peer group excellent technical skills are assumed....Lorraine is extremely cognisant of the need, not merely to provide legal advice, but to place that advice in a commercial context.

Importantly, in my dealings with her, I have found Lorraine to be extremely cognisant of her client’s reputational requirementsLorraine’s integrity, independence and objectivity are key attributes that she brings to bear on both her personal and professional life.”