From: Lead Investigator
To: peter.finnegan@oireachtas.ie
CC; elaine.gunn@oireachtas.ie; ceann.comhairle@oireachtas.ie; john.mcguinness@oireachtas.ie; contact@irldefrauded.com
Monday; 11/10/2025; 3:42pm

Dear Mr Finnegan

We are forwarding the below email and we also attach a copy of the correspondence sent to the Ceann Comhairle and Leas Ceann Comhairle on October 17, 2025, regarding what our research finds is your falsely sworn affidavit dated July 2019, in which you stated that there was no retaliation against Ms Lorraine Morris, a member of the Expert Support Team, after she made Protected Disclosures in regard to multiple irregularities during the Banking Inquiry.

If even one of the examples of retaliation outlined by Ms Morris and described beginning on Page 2 of the attached file entitled "False Affidavit filed by the Dail Clerk" is inaccurate, please let us know which one and why it is incorrect, by close of business on Friday, November 14, 2025.

We have shared our analysis on the false statements contained in the position paper with Hayes Solicitors, in advance of the faux mediation in May 2022. We note that, to date, Hayes Solicitors have not refuted any of the analysis related to the false statements. Perhaps you might be in a position to share whether you and / or Ms Elaine Gunn participated in the preparation of those false statements or whether they were drafted by legal representatives Mr Joe O'Malley, Solicitor or Mr Joe Jeffers SC or Ms Oonagh McCrann SC, or as a combined effort.

We also note again, for the record, that you failed to respond to our detailed questions emailed to you on February 3, 2025 and subsequently sent via US Mail.

We also enclose a copy of the research questions sent on November 3, 2025 to your successor, Ms Elaine Gunn (the author of the Gunn Report in May 2015), which erroneously found no irregularities in the Inquiry and included a false statement about Ms Morris, with a view to falsely discrediting her.

We welcome any comments, by close of business on 14 November 2025.

Martin O' Cianain
Www.irldefrauded.com/research
Contact@irldefrauded.com

From: Lead Investigator
Sent: Friday, October 17, 2025 12:41 PM
To: ceann.comhairle@oireachtas.ie <ceann.comhairle@oireachtas.ie>; John McGuinness <john.mcguinness@oireachtas.ie>; veronica.murphy@oireachtas.ie <veronica.murphy@oireachtas.ie>
Cc: Lead Investigator <contact@irldefrauded.com>
Subject: The Dail Clerk item of significant concern

Dear Ms. Murphy and Mr. McGuinness

In connection with our ongoing investigations regarding banking frauds in Ireland, we note that the publicly shared post, quoted below my signature and in the attached was made about the Dáil Clerk, Mr. Peter Finnegan.

<u>It has faced no challenge or dispute</u>.

We have contacted the individual who posted this statement, who is known to Mr. McGuinness.

Ms. Morris alleges the following:

"The false affidavit was prepared simply to prolong litigation.

Mr. Finnegan knew that certain of my Protected Disclosures had already been substantiated; he knew that three colleagues who were senior civil servants supported me; he knew that Mr. Allen did not investigate my Protected Disclosures and had fabricated his report about me; he knew that Governor Honohan had deemed my disclosures to be credible.

Mr. Finnegan's swearing of a false affidavit amounts to a clear abuse of the legal process and it is a blatant misuse of the legal system for an improper purpose. Mr Finnegan has advanced a pleading without any reasonable basis or bona fide belief in its validity.

Pleadings and affidavits must be made in good faith, with a factual and evidential basis and any false or misleading affidavit sworn under section 14(5) of the Civil Liability and Courts Act 2004 constitutes a criminal offence and exposes Mr.Finnegan to sanctions for litigation misconduct.

Mr. Finnegan has improperly used the court process and blatantly undermined justice. It is my intention to pursue a criminal complaint against Mr. Finnegan as well as to file a complaint with the Standards in Public Office Commission.

I will request that Mr. Finnegan and Mr. Deering recuse themselves from considering the SIPO complaint"

Based on our own extensive research with multiple victims of bank frauds, we submit that Mr. Finnegan should immediately be suspended, while a thorough investigation takes place regarding the false affidavit sworn by him and filed in the High Court.

Below and attached in a pdf file is a copy of Ms. Morris' post on X and a summary of some of the acts of retaliation that Mr. Finnegan claims never took place on pages 2 & 3 This is non-exclusive according to Ms. Morris and of course, Mr. Allen's fabricated report (#18) about Ms. Morris constitutes one of the main acts of retaliation perpetrated against her in breach of the Protected Disclosures Act 2014 (as amended).

Sincerely,

Martin O'Cianain

www.irldefrauded.com
10 Stephens St, PO Box 106
Andover, MA 01810

Copy of post on X

"In my case, a false affidavit is filed to accompany the meritless Defence.
That affidavit is concealed from me by my own legal team between 2019 and 2025.
Released under DSAR.

Deponent swears no penalisation in the face of multiple proven acts including a lengthy fabricated report crafted by a sitting Court of Appeal judge - Senan Allen.

Official transcripts prove report is fabricated. The fabrication assists in concealing fraudulent activities of banks that are ongoing.

Mr Justice Allen is permitted to adjudicate on cases related to my disclosures between 2018 to present date.

It is unsafe for litigants opposing banks and vulture funds to appear before Mr Justice Allen (& certain other judges). I have notified the Dept of Justice."

False Affidavit filed by the Dail Clerk[1]

“In my case, a false affidavit is filed to accompany the meritless Defence.

That affidavit is concealed from me by my own legal team between 2019 and 2025. Released under DSAR.

Deponent swears no penalisation in the face of multiple proven acts including a lengthy fabricated report crafted by a sitting Court of Appeal judge - Senan Allen.

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[1] Copy of post on X on 15 October 2025 by @MlorrM

CIVIL SERVICE RETALIATION
DUE TO PROTETCED DISCLOSURES
by
The Investigator[2]

By the Service unfairly, unnecessarily and disproportionately, retaliate against me in breach of the means of processing set out in sections 12(1) and 21 of the Protected Disclosures Act 2014:

1. By stationing a superior on the street outside the Investigator's office entrance to monitor their arrival at work so as to alert others of my arrival

2. By stationing yet another superior "to greet the Investigator" on the floor to ensure they could not talk to colleagues or to other people supportive of the Investigator making my Protected Disclosures.

3. By attempting to reassign the Investigator to another role.

4. By threatening to withhold the Investigator's salary and failing to prevent publication of that threat.

5. In these circumstances a newspaper headline publishing this threat in a mainstream Sunday newspaper caused significant distress to the Investigator and to their family members.

6. A request not to discuss evidence that the Investigator had seen during their time as Investigator of the Central Bank with their colleagues who would remain on the Regulatory Stream.

7. The production of a Report on 6 May 2015 which contained false statements with the intention of discrediting the Investigator.

8. This false 6 May 2015 report was drafted by Ms Elaine Gunn who reports directly to Mr Peter Finnegan, Dail Clerk.

9. Ms Gunn was aware and remains aware that no investigator on the wider team has yet contradicted the statements made by the Investigator in the Protected Disclosures on 25 April 2015

10. Not conducting a sufficiently thorough investigation into the Investigator's allegations

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[2] Source: www.irldefrauded.com/retaliation

a. given that Ms Gunn also refused to speak with a number of investigators who spoke out in of the Investigator's defense and who had witnessed the conduct referred to in my original e-mail.

b. To do so would disrupt the preordained outcome for the report (produced by the Service);

11. A false announcement of the Investigator's resignation during the week of 1 June 2015

12. Clearing of the Investigator's desk and personal items without their knowledge.

13. The false announcement of the Investigator's resignation was made by an employee of the Service and the Investigator's desk was cleared by an employee of the Service.

[Note: when challenged, there was an immediate back pedaling in relation to the Investigator "fake resignation" by Mr Michael Errity (another employee of the Service) in which he states that desks were simply being reconfigured with the Investigator's desk subsequently being restored to its previous state]

14. The notification of the suspension of the Investigator's salary on 15 July 2015 by the Service in breach of the Protected Disclosures Act 2014.

15. When two elected representatives argued against the suspension of the Investigator's salary, it was the Service who ignored this argument or alternatively advised that it was not a matter of concern to the elected representative, despite it being a matter of the breach of Irish legislation.

16. The issuance of a false statement to the media in respect of the Investigator's former colleague's reasons for resigning, i.e. an outright denial when in fact the Investigator and numerous other investigators are aware of the Services' knowledge of the reasons for resignation and that they are linked to the Investigator's concerns.

17. The continued facilitation of repeated and obvious delays associated with the commencement of an investigation into the allegations raised and

18 The preparation of the false Senan Allen report and acceptance of it by the civil service