

**Martin O'Cianain  
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November 28, 2025

**To:** All Partners  
Hayes Solicitors LLP  
Lavery House  
Earlsfort Terrace  
Dublin D02 T625  
Ireland

**cc:** Joe O'Malley – Managing Partner  
Michael Kelly – Partner

Sinead Murphy, Legal Contingency & Guarantee, Specialist Underwriter  
Aviva Insurance

Dear Partners,

Further to our correspondence dated 3 November 2025 (attached for convenience), Ireland Defrauded writes to provide you with the following materials for your review and consideration in relation to Hayes solicitors' instrumental and ongoing role in concealing the fraudulent activities of Irish regulated banks, by deliberately weaponizing the court process with a view to intimidating and silencing whistleblower, Ms Lorraine Morris, Solicitor.

This is occurring while your firm continues to receive taxpayer-funded fees from Irish citizens in connection with the underlying matters that are not victimless crimes but instead have resulted in thousands of suicides on the island of Ireland, as well as the destruction of families, mental health and the unlawful evaporation of significant generational wealth.

Please review in detail the following materials:

- 1 BankConfidential Report, presented on November 13, 2025 at Palace of Westminster  
<https://www.appgifffs.org/wp-content/uploads/2025/11/BC-Hidden-Credit-Lines-The-Largest-Fraud-Anywhere-Ever.pdf>
2. Summary of BankConfidential Report - attached to this email.

3. Financial Times (FT) Adviser Article dated November 14, 2025 – Banks referenced and contacted for comment, yet to date have issued no denial and have provided no comment.

<https://www.ftadviser.com/investments/2025/11/14/report-demands-50bn-redress-for-businesses-over-credit-lines/>

4. Video presentation of John Mc Guinness, TD in Dail Eireann, November 26, 2025 in which he comfortably refers to the Irish Banking Inquiry as a “**complete whitewash**” and a need to hear from Ms Morris in relation to an **Ulster Bank investigation and a call for 50billion redress** – in which Ms Morris has stated that Ulster Bank used swaps and derivatives to artificially distress loans and to destroy viable businesses with catastrophic consequences.

[https://youtu.be/Jzx50oG12ig?si=Cg8m\\_tLVK0lg2j2D](https://youtu.be/Jzx50oG12ig?si=Cg8m_tLVK0lg2j2D)

Please note that the conduct of Ulster Bank as alluded to in the Bank Confidential Report involves “relevant offences” within the meaning of the Criminal Justice Act 2011, including fraud and related financial crime. Section 19 of that Act creates a criminal offence where a person who has information that he or she knows or believes might be of material assistance in preventing the commission of a relevant offence or securing the apprehension, prosecution or conviction of any other person for a relevant offence fails, without reasonable excuse, to disclose that information to An Garda Síochána as soon as practicable.

By this email, each Hayes’ Partner is now formally on notice that there is a real and identifiable risk that your own firm, and those acting on its behalf, have become complicit in the fraudulent activities of Ulster Bank as described, including by actions taken in the course of the litigation initiated by Ms Morris against the State, due to the fabricated report written about her by Mr Justice Senan Allen. We confirm that we have reviewed the official transcripts of the interviews between Mr Allen and Ms Morris and we confirm that Ms Morris’ assertion is correct – the Senan Allen Report is false and the government press releases promoting it as a reliable narrative are demonstrably false and mislead the Irish public.

In light of section 19, each of you must independently consider whether you hold information that you know or believe might be of material assistance to An Garda Síochána in relation to these suspected offences and, if so, whether you are under a statutory obligation to report that information without delay. You will be aware that the section 19 obligation is personal, applies to “any person” (including solicitors and partners in a law firm), and that failure to comply without reasonable excuse is itself a criminal offence carrying potential imprisonment and an unlimited fine.

It remains your responsibility to obtain independent legal advice as to your individual exposure, your firm’s position, and any steps required to comply with Irish law. In the circumstances, it is expected that you will:

- (a) preserve all potentially relevant documents, files and communications (including internal and external emails and litigation papers) received and in particular from the Managing Partner, Mr Joe O’Malley and Partner, Mr Michael Kelly – in the likely

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- (b) event that they have erroneously reassured Hayes partners that these matters should not cause concern to other partners;
- (b) take immediate steps internally to ensure that no further use is made of court processes by Hayes solicitors to threaten, intimidate or to silence Ms Morris or her legal representatives; and
- (c) to consider making appropriate disclosures to An Garda Síochána and any other competent authority without delay, particularly in the event that you have been erroneously reassured by Mr O’Malley and Mr Kelly that there are no underlying fraudulent activities by Ulster Bank or indeed the State – as this is categorically false based on the detailed research conducted by us, in conjunction with BankConfidential and Ms Morris.

### **Insurance Carrier Notification**

This correspondence is being copied to your professional indemnity insurers for the express purpose of placing them on notice of the allegation that the firm has been complicit in concealing fraudulent activities through the intimidation of a whistleblower in matters arising from the Ulster Bank frauds. In circumstances where victims of the Ulster Bank frauds, upon notice of the frauds and the role of Hayes solicitors in actively concealing same by the intimidation and silencing of a whistleblower, such victims may reasonably consider adding Hayes Solicitors as a defendant in civil proceedings. Ireland Defrauded will liaise with the insurers to seek their input on the matters raised.

It is a matter for the insurers to consider whether any continued participation in, or condoning of, such conduct would entitle them to withdraw or deny cover on the basis of typical policy provisions, excluding claims arising from dishonest or fraudulent acts, committed or condoned by the insured. Many of the dishonest acts of Hayes Solicitors have been set out in the letter dated 3 November 2025 and by any measure, these have not been credibly refuted by the firm.

Please confirm, within seven days, the steps taken by you to address the issues raised in this letter and to comply with any applicable statutory reporting obligations. Every partner is entitled to a right of reply and to appear on camera in the event that he or she wishes to contribute to a documentary on the topics raised, however, the production team will have the final say in these matters.

Yours sincerely,

Martin O’Cianain