October 17, 2025

Mr O’Malley
Partner
Hayes Solicitors
Earlsfort Terrace, Dublin D02 T625

Dear Mr O’Malley;

I am contacting you as part of an ongoing investigation for a forthcoming documentary that examines the treatment of Ms Morris, a senior capital markets and derivatives lawyer who raised Protected Disclosures during the Irish Banking Inquiry.

Our team has spent months reviewing disclosures, transcripts, records, court filings, correspondence, conducting interviews and taking first-hand accounts from victims of bank frauds in Ireland.

What emerges is a deeply troubling picture of how your law firm, acting on behalf of the Houses of the Oireachtas (or indeed perhaps the State Claims Agency) has handled this litigation in terms of misleading the High Court.

Here are some of the main issues we expect to report on:

**The Senan Allen Review**

Despite being appointed as Senior Counsel to independently examine Ms Morris’ Protected Disclosures, Allen did not interview corroborating witnesses or engage with the serious Protected Disclosures regarding the Central Bank. These omissions by Allen were later highlighted by a Joint Committee Member, Mr Marc MacSharry on 8 September 2015.

Official transcripts further confirm that, not only did Allen fail to carry out basic research in multiple key areas, he appeared to devote more energy to pressuring Ms Morris to withdraw her Protected Disclosures, rather than conducting any genuine investigation.

**False Pleadings and False Affidavits**

Evidence shows that a sworn Affidavit by Dáil Clerk Mr Peter Finnegan was false in material respects, yet it was filed in the High Court with what Ms Morris has claimed is a meritless Defence. Our research confirms Ms Morris’ position.

This raises serious questions about whether your law firm participated in facilitated the filing of a false pleading and a false affidavit in on-going litigation in breach of Irish legislation and to fundamentally mislead the High Court to prolong litigation at the taxpayers’ expense.

Similarly, we have reviewed the correspondence dated 19 November 2024, sent by you to Ms Morris that includes unlawful and baseless threats of an injunction. This correspondence includes the mediator, Mr O'Donnell. When Ms Morris called this out asking who had signed off on this unlawful threat against her in breach of law, you stated that instructions were emanating from the State Claims Agency. However, when Ms Morris contacted the SCA, they denied having any knowledge of the litigation. Hayes later contradicted this and confirmed that the SCA was their client. Could you please clarify this point for the avoidance of doubt?

Your law firm later seemed to retract the unlawful threat of an injunction.

In January 2025, Ms Morris received a further threat giving her 28 days to respond in relation to a discovery request or face what she considers to be a baseless costs threat; when Ms Morris agreed with certain conditions and called out the baseless and unlawful threat, your firm then failed to respond or follow through on what Ms Morris alleges was a further baseless threat.

Please comment.

**Mediation in Name Only?**

After a 30-month delay, the mediation that was eventually convened was heavily controlled by your firm, not Mr O'Donnell, who himself was compromised by close family ties to the judiciary. Your firm filed a last-minute position paper containing multiple proven inaccuracies.

We quote our review of the position paper in the attachment and welcome your comments.

**Obstruction of External Representation**

When Ms Morris retained legal representation outside Ireland, your firm refused to engage unless she followed procedural hurdles at home, further extending the process at Irish taxpayers' expense – perpetuating the false narrative.

**Ongoing use of Public Funds**

Records show your firm received more than €5 million in both 2021 and 2022 from the Irish taxpayer. A portion of these funds appears to have been used not to resolve a genuine dispute, but instead to suppress Ms Morris' Protected Disclosures, to protect Mr Allen, to mislead the public and conceal evidence of multiple parallel banking frauds that have been executed and are ongoing.

Since May 2022, Ms Morris has made large parts of this record public, including details of Allen's conduct, and posts have been viewed by far in excess of 100,000 people without any refutation.

**Engagement with Ms Morris' Brother**

Ms Morris has confirmed that in an informal conversation with her brother you indicated that all would be "okay", as she was in good hands with Mr John Rogers considering his status.

Was it instead the State that was "in good hands" with Mr Rogers considering he turned away supportive witnesses and became wedded to Ms Morris maintaining anonymity in terms of the wider public and his routine advice to her not to speak to other whistleblowers – many of whom had hard evidence of bank frauds?

**Interference with Legal Representatives and Mediator**

Leaving aside the obvious interference from the review of files; might you answer the following question:

Considering Hayes solicitors close relationship with C.M. Haughey Solicitors in the medical negligence arena, did it exercise influence over Ms Haughey to withdraw from representation of Ms Morris only five days after providing guidance to counsel and to return the file to Messrs FHOR and back under the control of Mr Rogers SC.

We note that Ms Haughey's Senior Counsel firmly rejected Mr Rogers SC being involved in the case following his review of the file.

**Your Own Role**

It has struck our team to ask you the following:

If your peers in your local rugby, golf or cricket clubs in the Clontarf area knew of the intense retaliation, meritless and unlawful threats initiated by your firm against Ms Morris, a senior female professional and former resident of Clontarf - as your firm and associated barristers were / are being paid hundreds of thousands of euro from Irish taxpayers' funds to draft and file meritless pleadings, affidavits and correspondence, how do you believe might they react to you – particularly given the extent of the fraudulent activities that you are assisting the State in concealing?

Some of those who have received our detailed questions informed us that they have notified their professional indemnity insurance carrier immediately following receipt of our questions.

Will you be contacting yours upon receipt of these questions or has the Irish State provided you with an indemnity of some kind?

**Advance Notice**

This email serves as advance notice that the treatment of Ms Morris by Hayes solicitors will form a central role in the documentary with the issues referenced above being being covered in much detail.

This correspondence will be published, in full and without redaction, on our website. We are also considering submitting our findings to regulatory and oversight bodies in Ireland and in the United Kingdom.

**Right of Response**

You are invited to provide a comment or response for inclusion in the documentary and to go on camera given your role and the significant funds you have received annually from the Irish tax receipts. If you would like to go on camera please let me know and we will provide your name to the documentary team, but the final decision will be there's if they want to interview you. If we do not receive a response, by close of business October 24, we will of course note that you, or your law firm have declined to respond. We reserve the right to post these questions on our website in full disclosure at any time.

This is a moment for accountability.

The Irish public deserves to know how Ms Morris has been treated by Hayes solicitors, how her Protected Disclosures were handled by your client, how government solicitors routinely breach Irish legislation that affords protections to whistleblowers and how taxpayers' funds are being spent in an effort to deceive the very people who provide your firm with funding.

Sincerely,

*Martin O'Cianain*

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Continued on next page

**Examples of Falsehoods in the pre-mediation Position Paper prepared under the oversight of Hayes solicitors**

Note: the following statements are based on our review of documents and interview notes. You are entitled to a right of response, which we will commit to publishing.

#6

**Hayes solicitors' states:**

*The Plaintiff elected not to challenge the Allen Report and/or the findings made therein (whether by way of judicial review or otherwise) and is now out of time for so doing. The Plaintiff cannot use these personal injuries proceedings to launch a collateral attack on the Allen Report.*

**Truth:**

Correspondence dated 25 November 2015 clearly shows the Allen Report was indeed strongly disputed, and it was done so thoroughly by Ms Morris herself, with oversight and sign off by Mr John Rogers SC.

Furthermore, we have reviewed multiple letters in which Ms Morris' lawyers requested that the fabricated Allen Report be removed from the Oireachtas website.

We submit that Ms Morris not being aware then that her own lawyers were compromised does not transform your false statement into a truthful one.

**Hayes solicitors' states:**

#6

This refers to the Defendant (not the SCA) coming to a meeting in good faith and is clearly false as the purpose of the meeting appears to have been to perpetuate the fabricated Allen Report rather than resolve the dispute.

A few additional sections from the position paper highlight some other areas of serious concern and raise questions as to why the mediator allowed the position paper to be delivered with no time to respond.

**Hayes solicitors' states:**

#5

"Mr Allen SC conducted a thorough and comprehensive investigation; into the issues raised in the LM Report and on 1 September 2015, delivered the Allen Report to Mr Finnegan. Mr Allen's main conclusion was that "*there is no substance whatsoever in any of the allegations".*

**Truth:**

The official transcripts we have reviewed show this statement to be completely false.

Allen did not interview corroborating witnesses **in his own words.**

Allen did not investigate conflicts of interest **in his own words.**

Allen did not interview a member of the Export Support Team who resigned in support of Ms Morris - as a result of how the Inquiry was being managed.

Allen did not investigate the matter of the withheld and heavily redacted documentation emanating from the Central Bank **in his own words.**

An email from former Senator Marc MacSharry Joint Committee Member dated 8 September 2015 to his fellow members demonstrates that he held similar concerns.

**Hayes solicitors' states:**

*"The Allen Report was duly published in redacted form. The Plaintiff is not identified in the Allen Report."*

This is a further false statement entered into a position paper with oversight of Hayes solicitors.

**Truth:**

Ms Morris was immediately identifiable as a female, a qualified solicitor and a trained lawyer.

She was the only legal professional on the Expert Support Team. She was approached by strangers in the months following who knew she was the individual in question.

#10

**Hayes solicitors' states:**

*"While the Defendant comes to this mediation in good faith, it is very considerable risk the Plaintiff faces of having her entire claim dismissed."*

Based on evidence that we have reviewed, this section #10 is also false and amplifies the bad faith expressed in #6.

**Truth:**

From our interviews with Ms Morris, the Defendant did not come to the mediation in good faith, rather it came with a view to (a) furthering delays and to use the meditation as discovery and (b) perpetuating the fabricated Allen Report that would permit the banking frauds to continue unabated.

Even the mediator, who was controlled by Hayes solicitors, based on our research was more concerned about Ms Morris' prior career, than in bringing the long-standing proceedings to an end. He referred to Allen's treatment of Ms Morris as "*scurrilous*" as witnessed by Ms Morris' brother.

It is evident from prior communications that neither the mediator nor Hayes solicitors and the Defendant had any intention to resolve this case and the statement in #10 is completely false based on our research.

Ms Morris will now say that what she had faced up to May 2022 in terms of interminable delays, interference with witnesses, bullying by counsel because she sought to remove a fabricated report about her from the official record has now been compounded by

(i) the bad faith and contrived mediation.
(ii) the unlawful and baseless threat of an injunction and other baseless costs threat.
(iii) unlawful interference with her devices as reported to An Garda Síochána in Clontarf.
(iv) attempts to intimidate her with baseless requests for her medical records and veiled references to investigating her private life going back to 12 years before her role as a Member of the Expert Support Team.
(v) the unlawful intervention with her subsequent legal representative resulting in her coming off record only five days after briefing counsel.
(vi) the unlawful obstruction of Ms Morris' most recently engaged counsel who discovered the identical concealed frauds in the Netherlands, as were being perpetrated in Ireland and that are ongoing.

**Hayes solicitors' states:**

#16

*"Rather, the Plaintiff's case is that the Defendant was negligent in publishing the Allen Report. Given that it is accepted that the appointment of Mr Allen was the appropriate and proper response to receipt of the LM Report, how can it reasonably be contended that what the Defendant ought to have done at the conclusion of that process is refused to publish the report?"*

**Truth:**

Allen's multiple conflicts of interest were not addressed and as such his appointment was neither appropriate nor proper. Official transcripts demonstrate that he did not conduct any investigation at all (and he confirms this in his own words) and therefore he should not have authored any report, let alone a fabricated report to mislead Irish citizens about the conduct of Irish banks – which is ongoing.

**Hayes solicitors' states:**

#19

*"Moreover, as noted above (§5) the Plaintiff is not identified in the Allen Report. The suggestion that she is identifiable from certain references to her professional qualifications is not made out. It is therefore difficult to understand how the Plaintiff can attribute the loss of her entire career to the publication of the Allen Report."*

**Truth:**

Allen identified Ms Morris as female, a trained lawyer and a qualified solicitor in his Report. She was one of four women on the Expert Support Team and the only legal professional and therefore she was immediately identifiable. Ms Morris was approached by strangers following publication of the Allen Report.

Ms Morris reports that Allen informed his colleague Mr Richard Kean SC who telephoned her on his way to a barbecue at Allen's house - sympathising with her, but admitting that he knew her disclosures were correct.

Mr Kean SC later identified Ms Morris to his colleague, Mr Barney Quirke SC – and this was advised to Ms Morris by Mr Quirke during an in-person meeting and has not been denied.

**Hayes solicitors' states:**

#26

*"In this case, no action was taken against the Plaintiff because she made what she alleges to be a protected disclosure. On the contrary, the matter was properly investigated by an independent expert specifically appointed for this purpose. Therefore, any detriment suffered was not caused by the publication of the Allen Report."*

**Truth**

Allen acknowledged in his own words that the disclosures were Protected Disclosures.

Allen was not independent and as said elsewhere here, he did not investigate the Protected Disclosures as proven in transcripts and in an email from a Member of the Joint Committee, Senator MacSharry on 8 September 2015 to his fellow Members.

If Allen was indeed independent, why was he researching Ms Morris' background at the Bank of Ireland and making the scurrilous claim that she left the avian flu behind, when BoI was a client of her private practice post departure?

Why would the transcripts show that Allen said:

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

Why would the transcripts show

*"will you withdraw your report?*

*will you withdraw your report?"*

Are these the words of someone with a shred of independence?