

FINAL REPORT

A Case of Mismanagement of Irish Government Funds?

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Introduction

This is my final communication on my case (aside from a one pager in December - keep reading), and while it pushes the envelope in certain areas including by hypothesizing broader consequences when a government is involved in criminal activity, I believe my prior Reports have established a credible basis for any extrapolations I have made.

Why a third Report you ask? To prove that nothing has changed since the publication of my first summary document in 2014, not even at the highest levels, the Irish Prime Minister, Garda Commissioner etc. That is, the culture the former Prime Minister stated (2014) we were never going back to has never changed. I'd like to reassure you that this Report is not anti-Irish Government as I hope the issues I raise will go towards improving the Irish Government and ultimately the quality of life of the Irish people.

Following are the links to my first and update Reports (first Report includes summary docs):

First Report:

<http://www.eoi.at/d/EOI%20-%20Jahresberichte/Irland/Report%20-%20A%20Case%20of%20Mismanagement%20of%20Irish%20Government%20Funds.pdf>

Update Report:

<http://www.eoi.at/d/EOI%20-%20Jahresberichte/Irland/Irl-update%20Report%20February%202018.pdf>

I'd like to again thank whichever nation/s also uploaded my update Report onto the European Ombudsman Institute (EOI) website. Now, both my first and update Reports can be accessed on this great website. See 'Popularity of the Ombudsman' at:

<http://www.eoi.at/?Historiae%20-%20Begr%C3%BCnder>

Although my prior Report ([update Report](#)) completed my investigation into the disbursement of funds under Innovation Fund Ireland (IFI), and by extension a profile of the Irish Government and Ireland's oversight system, using my test case as a basis, there were still some outstanding items to address. Fortuitously, by addressing these items, I was able to focus proof of my case on just one audit document.

Therefore, **first**, I can now finally prove my case in its entirety through the release of **just one audit document** ([Attachment 1](#)). Unfortunately, all the organizations that have access to, or can access, the document have refused to provide it (NTMA/NPRF, PwC, ICAI, Comptroller and Auditor General. The Irish Prime Minister and the Irish Police Force have effectively refused to provide it by not responding to my request for an investigation wherein the release of this document could be compelled). And ICAEW, ICAI and PwC I believe **lied about its scope of services**.

Second, I believe I have proven **fraud on the part of ICAI** (Chartered Accountants Ireland) which corroborates the above and the evidence I've provided in my Reports ([Attachment 1](#)).

Therefore, I have done all the work for anyone who has the power to compel the release of this document, and I've no doubt there are a few of you on my mailing list who can do this. This might be important for the relevant **EU** body/s who may have a case/jurisdiction now that the crime is a current one (Irish Government's subsequent cover up and likely cover up by oversight bodies/Prescribed Accountancy Bodies (PAB's) and others) and based on the fact that the Irish Government was stealing taxpayer funds while at the same time begging for, and receiving, money from the EU to bail it out of the financial crisis.

Do any of you reading this find it unusual that I would be told by all of the above bodies that I have no case, and yet when I make a request for a copy of a document in their possession which I inform them I believe will

prove my case, they all refuse to provide it? Not giving me a copy of an audit plan relating to the year 2010/2011 of a now disbanded organization, the NPRF?

Please read [Attachment 1](#) first before proceeding. This is my recent communication with the Taoiseach (Irish Prime Minister), Garda (Police) Commissioner and Director of Public Prosecutions (DPP).

Prescribed Accountancy Bodies (PAB'S)

My Reports have ignored the warnings PAB's give me in their replies that their communications effectively should not be disclosed or discussed with third parties. You know, the usual strict confidentiality nonsense (aka cover up). This way I'm doing what these PAB's should be doing in the first place by informing the Public (in the Public interest) and letting the Public make their own decisions.

You see, the trick that seems to be played by the PAB's is that after you send your complaint to them, they deny that anything inappropriate occurred. Your complaint finally ends up with IAASA who then claim strict confidentiality rules so that you never find out what happens. I've no doubt Russia has a similar oversight system, and I mean that sincerely.

Regarding [Attachment 1](#), in particular the likely fraud I've detailed by Chartered Accountants Ireland (ICAI), I'm asking those of you who are members of ICAI to insist upon an investigation in order to **protect the integrity of your accreditation**, otherwise it's completely meaningless.

Whenever a nation (like Ireland) offers funds to investors in a foreign nation for the purpose of attracting them to Ireland, the foreign nation's oversight bodies should be part of the evaluation process. If any of you reading this ever come across an Irish Government program offering potential funds to foreign or US investors, please inform the Securities and Exchange Commission (SEC) directly so that proper oversight of Irish taxpayer funds, and the disclosures required of US investors, can be exercised.

I believe there are now oversight bodies outside of Ireland that are aware of my Reports, so hopefully they'll have an impact and the Irish taxpayer can be reassured to some extent that their money won't be just handed over preferentially (outside of a fair evaluation process) to companies that have no intention of spending it in Ireland, thus effectively bypassing the need for these meaningless Irish oversight bodies and PAB's.

A few other points...

- It was okay for ICAI to send my documents to PwC without my permission ([update Report](#), p.172, B, third paragraph) but according to ICAEW, they need PwC's permission to give me a copy of the internal audit plan that PwC provided them ([Attachment E](#), email June 12, 2019)? In fact, the audit plan could also be provided by the NTMA/NPRF, in which case ICAEW doesn't need permission to give me a copy, and the NTMA never said that permission was required of PwC for the NTMA to provide me with a copy.

I suppose, when I referred to conciliatory mechanisms PAB's provide complainants in my update Report (p.214), perhaps 'concealiatory' mechanisms would have been a more accurate term.

- I noticed that ACCA updated the inaccurate information on its website (p.148, [update Report](#)) after publication of my update Report. I noticed the change by clicking on the link (original) on page 151, in the email dated 08 July 2017, in my update Report (immediately below) **a few months after** its publication (this link no longer pulls up this website page).

<http://www.accaglobal.com/us/en/member/standards/auditing-standards/reportinggovernance-uk-ie.html>

However, although they changed the sentence:

“The FRC sets standards for corporate reporting within the UK and Ireland, and monitors and enforces those standards.”

to:

"The FRC sets standards for corporate reporting within the UK and monitors and enforces those standards."

I'm still somewhat confused why they kept the word 'Ireland' in the title (see new link below which pulls up this website page)?

I tried clicking on the above link (original) **recently** and all it brings up is a "Sorry we can't find the page you were looking for" message. So, I decided to search for the page and was able to find it under a different link (below) which address varies slightly from the original link address (see also [Print Screen ACCA](#)). Not sure why they subsequently found it necessary to vary the original link address when they had already made the change under the original link address (maybe they just didn't want people to see that they changed it after I brought it to their attention)? But it's good to know they're reading my Reports. Maybe their standards will be 'practiced' more from now on.

<https://www.accaglobal.com/gb/en/member/regulation/auditing-standards/reporting-governance-uk-ie.html>

FYI ACCA, I put 'FRC UK Ireland' in your search box and it pulls up some search results (pages) with FRC and UK and Ireland. Perhaps these too have to be corrected by having the word 'Ireland' removed?

- If you believe that my previous Reports demonstrate deception on the part of the Irish Government, then you have to conclude that ICAI and other PAB's are too being deceptive.

The 3 A's of an effective justice and oversight system, that is, Accountability, Accountability, Accountability stands in sharp contrast to the 3 C's of the Irish Government, that is, Cover up, Cover up, Cover up.

- I wouldn't mind if this was a cover up for national security purposes, but the scale of it, which likely includes all the named oversight bodies, to cover up for cheating in relation to a competitive tender...mindboggling!

And look at what's regarded as strictly confidential in the replies I've received from ICAI and ICAEW ([Attachment A](#) and [Attachment E](#) respectively). Let's not let the public know what's said in these letters that relates to the abuse of taxpayer funds that the Public should know about.

The reason I believe ICAI falsified its final decision by intentionally omitting material information relating to my case is likely because they wanted it passed to IAASA which has strict confidentiality requirements that will effectively bury any accountability.

IAASA has "stringent statutory confidentiality requirements" as regards updating complainants on actions taken by it, which seems very similar to what you'd expect from Swiss Banks, and IAASA is working in the Public's interest?

- ICAEW waited three months to reply which would have given them the opportunity to see my reply to ICAI ([Attachment E](#), email June 11, 2019, and [Attachment A](#) respectively).

I believe these oversight bodies should be disbanded, which as you and I know will never happen. This is why I'm hoping the EU and other foreign oversight bodies will be able to indirectly disband them by providing oversight of any Irish Government funding that's offered to investors in these countries. This way, these Irish oversight bodies will eventually become meaningless and unnecessary.

What the Irish Government seems to be doing is trying to get everyone (PABs, SIPO, etc.) to say that I'm wrong and then everyone else will be of the opinion that he can't be right and everybody else be wrong (but you can determine this yourself from my Reports). That's why I've said from the beginning that this is a systemic problem with Ireland's oversight system.

Finally, it seems ICAI thinks it's so smart getting the Irish Government and PwC off the hook when all it's doing is compromising the whole system where everyone loses faith in it. It also seriously discredits its members' ICAI accreditation. Why would it do this?

Standards in Public office (SIPO)

My new complaints to SIPO included additional points not made in my original complaints (p. 67-72 [update Report](#)), specifically points c. and d. below. It's up to you the reader to determine if what SIPO said in its decision (immediately below) is true based upon this new submission. If it was an honest decision, I'm guessing SIPO would have had no problem stating why the new points I made did not represent a 'specified act', which would have been very easy for them to do.

SIPO's decision/reply was a few lines, summarized in last line: "As it is the view of the Commission that you have not provided evidence of this in your complaints, the Commission deems the matters closed and will not give them further consideration. "

(points below added to my original complaints in update Report p.67-72)
c.

I had requested a review by the Information Commissioner of the NPRF's review/appeal decisions on my FOI requests. The Information Commissioner subsequently asked the NTMA to provide me with a decision letter (attached NTMA - NPRF Decision)

Based on this decision letter and my FOI request to the NPRF, I believe the decision to invest in Polaris (award funding) was made by each of the NPRF Commissioners in 2010 personally. I stated in part:

Regarding the decision to invest in Polaris, the NTMA decision letter states in part:

"The NPRFC was responsible for this decision, and as such the response to your request is that the commissioners that were in place at the time of entry into the investment were responsible for the decision to invest, and the 2010 Annual Report of the NPRFC confirms who the Commissioners were at this time."

The NTMA's decision above I believe supports SIPO's requirement that "A 'specified act' must have been done by a 'specified person' personally."

The reason I believe this is because my FOI request to the NPRF stated:

"I would be grateful if you would provide me with the name(s) of the person(s) at the NPRF Commission who made, or agreed to, the decision to award \$50 million, under Innovation Fund Ireland in 2010, to Polaris Partners. In other words, to be even more specific, if you would confirm that the appointed commissioners in 2010, contained in the Report and Accounts of the National Pensions Reserve Fund Commission for the year ended 31 December 2010, each made, or agreed to, the decision to award \$50 million, under Innovation Fund Ireland in 2010, to Polaris Partners, OR, if this is not the case, if you would provide me with the name(s) of only those from among the appointed commissioners in 2010, contained in the Report and Accounts of the National Pensions Reserve Fund Commission for the year ended 31 December 2010, who made, or agreed to, the decision to award \$50 million, under Innovation Fund Ireland in 2010, to Polaris Partners."

Since the NTMA's decision (partly stated above) states:

"the commissioners that were in place at the time of entry into the investment were responsible for the decision to invest",

This would mean that the decision to invest in Polaris was made both collectively and personally by each of the NPRF Commissioners in 2010, otherwise the NTMA would have listed in its decision letter, as per my FOI request:

"OR, if this is not the case, if you would provide me with the name(s) of only those from among the appointed commissioners in 2010, contained in the Report and Accounts of the National Pensions Reserve Fund Commission for the year ended 31 December 2010, who made, or agreed to, the decision to award \$50 million, under Innovation Fund Ireland in 2010, to Polaris Partners."

Since the NTMA didn't "...provide me with the name(s) of only those from among the appointed commissioners in 2010....."

this logically means that the NTMA believed that "A 'specified act' must have been done by a 'specified person' personally." by each of the seven NPRF Commissioners in 2010, otherwise it would have listed the names of either 1, 2, 3,4, 5, or 6 of the Commissioners as having been the decision maker/s.

d.

SIPO could also find out whether a decision by the NPRF Commissioners in 2010 to invest in Polaris or other VC Fund had to have been made unanimously by all 7 NPRF Commissioners in 2010 (an easy thing for SIPO to find out). If it had to be, then they are each personally responsible and "A 'specified act' must have been done by a 'specified person' personally.", because if one abstained the investment could not have been made.

Since "the commissioners that were in place at the time of entry into the investment were responsible for the decision to invest" (attached NTMA – NPRF Decision), they therefore had to have unanimously agreed to the investment, because if they didn't have to unanimously agree, the NTMA would have listed (per my FOI request) "...the name(s) of only those from among the appointed commissioners in 2010, contained in the Report and Accounts of the National Pensions Reserve Fund Commission for the year ended 31 December 2010, who made, or agreed to, the decision to award \$50 million, under Innovation Fund Ireland in 2010, to Polaris Partners.", but it didn't.

Do you believe that SIPO's FOI process is transparent? Well, whenever the word 'transparency' hits you in the face the minute you pull up the [home page](#), it's likely the snake oil salesmen are hard at work.

But based upon the results?

I counted the number of part-granted, granted, withdrawn and refused FOI requests on SIPO's website cumulatively from 2015 - 2019. The results are as follows:

Part-granted: 37
Granted: 10
Withdrawn: 14
Refused: 31

So, how transparent is SIPO based on these figures? We can determine this to some extent using simple math by finding the ratio of 'granted' requests to the total number of requests made. The total number of requests made (universe) as well as the number of 'granted' requests are subjective figures, as a weighting has to be put on the 'part-granted' and 'withdrawn' figures. That is, do I include the actual figures above ('part-granted' and 'withdrawn') or a percentage of them? Do I even include the 'withdrawn' figure in the total number of requests? What percentage of 'part-granted' requests do I add to the 'granted' figure?

For example, if I were to base my calculation on just the number of 'granted' and 'refused' requests (leaving out 'part-granted' and 'withdrawn' requests), you'd get a result of 24% granted requests (low end). Is this transparency? However, by including the 'part-granted' figure in the calculation, you'd get a result of 60% granted requests (high end).

However, I caution including the actual 'part-granted' figure in the calculation (which makes sense due to the word 'part') as this gives an inaccurate picture of transparency. When I made my FOI requests to the Irish Government, I received one document in particular that was 82% redacted but received others that I guess looked to be only about 10-12% redacted, maybe even less.

So I suppose statistically, to be fair, we can assume the 'part-granted' figure of 37 above could be equivalent to a 'granted' figure of about half that, that is, 18.5. You the reader can make your own determination. Therefore, if we now include this figure in the calculation, instead of 60% 'granted' requests, we get a result of 37% 'granted' requests. Is this transparency?

Finally, regarding the 'withdrawn' figure above, although I recall being asked if I would like to withdraw one of the FOI requests I made through the FOI unit of the Dept. of Jobs, Enterprise and Innovation (DJEI) as detailed in my first Report, I can't determine from the FOI log on SIPO's website why these FOI requests to SIPO were withdrawn, and whether the SIPO FOI unit had asked the requestor if this was something they wanted to do (as opposed to the requestor withdrawing of their own accord), which in my case I found to be suspicious behavior on the part of the FOI unit of the DJEI.

Therefore, I'm not going to include the 'withdrawn' figure in my conclusion (which is more favorable to SIPO).

But if I were to include this figure in the previous calculation, like the 'part-granted' case above I'd again only include a percentage (to keep things fair) of the 'withdrawn' figure (14), in this case 10% by assuming that although it may be common enough practice for Irish Government FOI units to ask requestors if they want to withdraw their FOI requests before subsequently making a decision on their request, their subsequent decision most likely (at least 90% of time) will not lead to the release of any documents as was the case with my request to the DJEI, but again, you the reader can make your own determination.

Plugging this figure (now 1.4) into the calculation we get a result of 36% 'granted' requests instead of 37% (no significant change). So, I would conclude that transparency at SIPO is about 37% ballpark, and if I were to get this grade in my exams, I'd have gotten an F, a failing grade.

Note: in 2017 for example, SIPO granted only two FOI requests versus refusing ten, while in 2018, it granted only one versus refusing twelve (see [Print Screen](#)). This just adds some further detail (and insight into SIPO's transparency) to the above calculations.

I've no doubt there are other variables at play here, the above analysis is simplistic (but not too simplistic in that it's a good start in determining SIPO's transparency). For example, are all requests legit? This might account for some of the refused requests, but on the other hand these would likely be included in the withdrawn category.

Even a link on one of SIPO's currently published investigation report connects to the old website, therefore when you click on it, you pull up a 'PAGE NOT FOUND' message. See Senator Brian O Domhnaill investigation report (2016), p.1, <https://www.sipo.ie/reports-and-publications/investigation-reports/Brian-O-Domhnaill-Investigation-Report.pdf> (see also [Print Screen](#))

If you go to SIPO's FOI Disclosure log, 2015, <https://www.sipo.ie/foi/foi-disclosure-log/> (see also [Print Screen](#)), the first request decision showing (top) states under the heading 'Details': "Records in relation to the investigation carried out into former councillor Dessie Larkin".

Does this mean the investigation report itself like for example those showing on the Investigation reports page, <https://www.sipo.ie/reports-and-publications/investigation-reports/> ? If it does, then journalists should make

sure to upload copies of all these published reports before they're cleansed later on down the line via the FOI process.

Why does a document/investigation published on SIPO's website for all to see then have to go through the FOI process and then be redacted or even refused access years later? Is this the same trick that Enterprise Ireland uses when they realize that a published article now represents potential evidence against them like when they effectively shredded evidence relating to my case as detailed in my [update Report](#) p. 65 back to 62?

If any of you would like a copy of the investigation reports relating to Councillor Oisín Quinn and Dessie Larkin, I'll be glad to send them to you since they've now been removed from SIPO's website, but I had preempted this and made copies some time back.

Take a look at the email I sent to Justice Daniel O'Keefe, Chairman SIPO Commission, in 2017 (p.82, [update Report](#)) where I state in part (p.83, second last paragraph):

"I see from your website, you not only investigated a paltry number of complaints since 2007 (ten in total), but none come even close to the serious allegation made in my complaints, that of effectively the theft of potentially Euro 250 million of taxpayer funds. And yet you investigate these lesser complaints and determine mine not to be worthy of even meeting the criteria of a complaint!"

SIPO's subsequent reply to my newer complaint demonstrates that it's business as usual at SIPO. Not to dwell on a point already made in my update Report, but SIPO and Ireland's Information Commissioner are effectively the same person. As per p. 24 of my [update Report](#) (and p.25, Powers of the Information Commissioner), SIPO could have gotten (and no doubt did) a lot more information that would make it impossible to deny that a crime was committed in my case.

The above quote continues:

"<http://www.sipo.gov.ie/en/Reports/Investigation-Reports/> (Exhibit 9 - Print Screen of link just in case SIPO decides to overhaul its website (remember earlier I mentioned that the Information Commissioner's website was overhauled) and remove this account)"

Try clicking on the link immediately above. The point I made in parenthesis was spot on in that SIPO actually did exactly what I thought they might do (cleanse their website). Again, this emphasizes the importance of the print screen function.

This page has now been reduced to only four years of reports as opposed to ten years on the original site. Amazing how transparency gets better over time! See [Investigation reports](#) (see also [Print Screen](#))

The importance of holding the Irish Government accountable for at least **ethical** violations is critical to a healthy justice system. The reason I say this is because accountability for ethical violations leads to the making of laws (at least according to my US insurance Continuing Ed class). This is a critical point. And this is the trick the Irish Government uses (via SIPO). By denying an ethical violation has occurred, there's no subsequent law made to deter the violation/crime from occurring over and over again.

Hence, these types of crimes (theft of at least \$50m of Irish taxpayer funds) will never be prosecuted because there's never going to be a law put on the books that allows them to be prosecuted. It's the perfect set up. They've every angle covered.

I'd suggest you read some of SIPO's decisions in these investigation reports and see what punishment has been doled out. Some of the decisions seem unusual. In one case (2017), the guilty party (Richard Hickey - see

investigation report link immediately below) ended up having to pay back only half the money stolen and allowed to retire, probably with full benefits. Welcome to the Irish Government, where crime seems to pay.

The complete report (unredacted) can be downloaded from the SIPO website, but will no doubt be taken down and filtered through the FOI process soon:

<https://www.sipo.ie/reports-and-publications/investigation-reports/Richard-Hickey-Investigation-Report.pdf>

See also: <https://www.irishtimes.com/news/social-affairs/family-support-agency-board-member-double-claimed-expenses-1.3055894>

Correction: In my [update Report](#), P. 83 last paragraph, I stated:

"Additionally, I see that whenever there was an investigation relating to a TD or Senator, (only two in fact), they were either dropped or ruled in their favor. "

I should have stated: "...either dropped or not send to the DPP." That is, although found in contravention, the Senator wasn't really held accountable.

Also, my reference to Exhibit 9 in the second last paragraph, p.83, was added after I sent the email for the purposes of my Report.

Relevancy of Large Audit/Accounting Firms

I was watching American Greed recently and there was an interesting case being aired regarding a company named TBW. This case again demonstrates how some of our major accountancy/auditing firms, in this case Deloitte and Touche, seem to be completely irrelevant when it comes to being able to identify fraud. While one can argue that identifying fraud is not the primary role of auditing firms, it's hard to accept this argument when the fraudulent activity is staring you in the face. Do we really need to audit the law abiding companies? How many dishonest companies are these accountancy firms not exposing?

<https://www.housingwire.com/articles/42640-deloitte-touche-to-pay-1495-million-in-settlement-over-taylor-bean-whitaker>

So, what's going on here? Why are these auditing firms seemingly so incompetent? PwC, in their role as internal auditor, couldn't even catch the significant criminal activity that was happening right under their noses by the Irish Government that I was able to expose, and I'm not even a qualified CPA. Something serious has to be done here about these firms in my opinion. I no longer respect these large accountancy firms and have serious reservations about their practices, preferring instead a small honest competent CPA firm.

Following are some articles that highlight the serious problems we have with many auditing firms, and only represent the tip of the iceberg. You don't always get to see these articles as they don't always get picked up by international news media, and can get purged not long after publication (like the Irish Government's likely scrubbing out of any trace of my Opportunity Ireland trademark - further down):

"Furthermore, the report says that internal and external auditors were also brought on board to manipulate the bank's systems to hide the various fraudulent payments made."

<https://www.irishtimes.com/business/financial-services/bankers-politicians-and-tribal-royalty-linked-to-vbs-bank-looting-1.3672120>

Article on another auditing firm, E & Y (Ernst & Young):

<https://www.irishtimes.com/business/financial-services/ey-s-audits-of-anglo-involved-serious-failings-report-alleged-1.3613200?mode=sample&auth-failed=1&pw-origin=https%3A%2F%2Fwww.irishtimes.com%2Fbusiness%2Ffinancial-services%2Fey-s-audits-of-anglo-involved-serious-failings-report-alleged-1.3613200>

It's amazing how PwC tells us it's the greatest thing since sliced bread on their website but all of a sudden seem to become oblivious to everything around them (even their own audits of the same company!) regarding alleged regulatory breaches:

<https://www.irishtimes.com/business/financial-services/quinn-inquiry-hears-pwc-was-unaware-of-loan-guarantees-impact-1.3908210>

According to a recent Irish Times article, "In addition a preliminary report carried out by former comptroller and auditor general John Purcell in 2011 for Carb said that there was "prima facie" evidence that EY – then known as Ernst & Young and earning €1 million in audit fees from the Anglo Irish – had a case to answer on major errors in the bank's 2008 accounts."

<https://www.irishtimes.com/business/financial-services/disciplinary-inquiries-into-former-anglo-executives-to-resume-1.3599332>

So why did I get the response I received from the Comptroller and Auditor General regarding my case and the 'major errors', indeed fraudulent errors, I found in the NPRF's 2010/2011 accounts ([Attachment B](#))?

Note: The Comptroller and Auditor General kept referring me to the NTMA, and look at the NTMA's reply ([Attachment C](#)).

PricewaterhouseCoopers (PwC)

PwC's 'Speak Up' hyperbole on its website induces its employees to speak up about any inappropriate behavior on the part of its clients. I wonder how many of these clients PwC has reported to the appropriate authorities since it's so concerned about their inappropriate activities? Very few? Perhaps PwC wants its employees to effectively spy on its clients so that it can find some dirt on them and then leverage this dirt to lock in the client?

I'd suggest to PwC's employees to certainly Speak Up to PwC, preferably anonymously if possible, but I'd also suggest that you monitor whether any action has been taken by PwC after say six months, and if not, subsequently anonymously report the client impropriety to the authorities, FBI or whoever is responsible. You don't have to let the FBI know that you have already informed PwC. This way, when the FBI does take action, you can inform them afterwards that PwC was aware of this impropriety and try to find out if they did anything about it. You can trust very few **firms** and oversight bodies today, at the end of the day it's all down to us, We the People...

Let me digress a little, but I'll try to tie it in to some extent.

I believe that Snowden should have given the US Government the opportunity to investigate his findings as opposed to going straight to The Guardian (even though he may have gone through internal channels at Booz Allen). I didn't work for any Irish Government agency and yet I brought my allegations against one of its agencies directly to the Irish Prime Minister. I gave the Irish Government many opportunities to investigate, but they refused and instead chose to cover up. I therefore had a right to take my case further particularly since I wasn't employed by any of its agencies or contractors.

In other words, I believe that all members of Congress (both political parties) act in the best interests of the US Public on national security matters. Snowden should have sent his findings through the proper US Government channels, which would have allowed the US Government to determine the best course of action to take in the context of national security. That's why we elect our members. We can't leave this task up to the Guardian Newspaper. Snowden could then have been offered some sort of reassurance that something was going to be done about it.

You have to, regardless of your skepticism, have faith in your Government, otherwise the whole experiment is meaningless. Unfortunately, I did the right thing by bringing my case directly to the Irish Government and look where it got me. It doesn't give you any confidence in the Irish Government.

My question is, is PwC being taken advantage of by the Irish Government or certain of its members (explanation A), or is PwC allowing the Irish Government to commit fraud (explanation B)? PwC was either highly incompetent by not identifying the significant risk (and possibly then covering up for it) that I a novice found, or it was aware that a crime was being committed from the very beginning. PwC doesn't have much choice here.

See p. 175 [update Report](#), Note highlighted in green on bottom, Exhibit 25, within which is highlighted:

"Internal auditing is a dynamic, exciting career. It gives you unique insight in to your organisation and its strategy. Internal auditors look at the big risks and issues that the organisation faces and think about whether these are being well managed. And to do this you need to be well trained."

Regarding explanation B, if I could identify (quite easily) this significant risk/fraud without the benefit of having an accountancy/CPA qualification and the use of formal investigative/analysis tools available to auditing firms, then even if PwC is claiming that the fraudulent transaction was not within its scope agreement with the NPRF, are we to believe that PwC, with all its auditing resources and experience, couldn't identify such an obvious fraud and bring it to someone's attention?

If PwC knew of this fraud from the beginning, my question is, could US national security be compromised as a result of the Irish Government's inappropriate actions?

Okay, this may sound conspiratorial, but bear in mind the old saying that 'truth is stranger than fiction', and although it would be very difficult for anyone to definitively connect all the dots here, I believe it's nevertheless credible to assume the dots could be part of the same relationship set (math). With the Snowden case in mind (not that my case is anywhere near as important as the Snowden case from a national security perspective), perhaps PwC is subject to demands from intelligence organizations in terms of these organizations needing to avail of PwC's financial and accounting network to tap into inappropriate activities by nefarious actors.

In other words, it would seem that PwC might be the Booz Allen of the accountancy world based on the fact that PwC is so well protected by organizations including those oversight bodies detailed in my Reports. And I'm fine with that as long as their actions are for the security of the Nation and I can safely go out and have a hamburger and a beer whenever I want.

If you accept this hypothesis as being possibly accurate, then it's reasonable to infer that U.S. **national security** could be compromised when for example certain gombeens in the Irish Government avail of PwC's services in transactions that are corrupt (individual greed) and involve PwC (at least one of its branches) in **criminal** behavior as detailed in my Reports.

When you're involved in criminal behavior, you could be exposed to other criminals that may not be as white collar as you are, who might be able to leverage this white collar crime beyond just (not minimizing the theft) the theft of \$50 million (at least). The result is that nefarious actors could be given an 'in' and target PwC (blackmail), as it may be an easier target. It might be easier to discern US Government intelligence activity via PwC than it would via US Government Departments or Agencies.

Perhaps I'm way off, but I certainly believe that nefarious actors explore every possible avenue, and therefore so should we, and if I, through my own investigation, see these possibilities, others too can make these connections. And if I'm right, then there's probably nothing new here apart from possibly providing another example of how nefarious actors can gain unauthorized access to US intelligence, in this case due to the involvement of a government (Irish Government) with crime.

If this is the case, then the US Government should slap the Irish Government back hard and never let them compromise US national security activities for their own greedy ends.

Regarding explanation A, how about this for a scenario: an Irish Government Minister, with close ties to the NPRF, brings in PwC as a cover for this Innovation Fund Ireland crime (without PwC's knowledge). They know that if they're caught, nothing will happen to them as PwC will be involved, and holding all involved accountable would bring PwC into a situation it would never want publicized.

So, the scenario goes like this - the crime (transaction) was hidden from PwC. PwC, upon finding out (by me), decided not to pursue a case against the Irish Government and instead effectively defend it by stating that the transaction was not within PwC's scope of services, hence keeping its relationship with the Irish Government (which is a very strong motivation, lots of business!). PwC therefore won't provide the internal audit plan as it will reveal that its scope of services included finding the type of fraud I exposed.

The Comptroller and Auditor General just signed off on the accounts perhaps because he was also aware of the fraud or he just trusted the fact that the NPRF accounts were above board with PwC's oversight (otherwise, he would have identified the fraud/transaction that I brought to his attention).

Now, if you replace the Irish Government above with an ordinary white collar criminal (that is, assuming there's a difference), PwC might not have the same motivation to cover up knowing that the cats now out of the bag. They may have if the cat was still in the 'Speak Up' bag. Do you think PwC would claim limited scope in this case?

PwC would very likely fight the criminal by claiming the fraud was inserted later after PwC's audit, and would very likely have no problem providing the internal audit plan as evidence that their scope of services would have caught this fraudulent transaction in the Annual Report and Financial Statements i.e. that IFI was another Irish Government entity and not a private equity firm.

Regardless of PwC's claim of limited scope, if a transaction is excluded from the accounts in a fraudulent manner, the internal audit plan is only way to prove this. It has to be. The internal audit plan is the only documentation of PwC's or indeed any auditing firm's activity with potential criminals.

Also, take for example the following article:

"Furthermore, the report says that internal and external auditors were also brought on board to manipulate the bank's systems to hide the various fraudulent payments made."

<https://www.irishtimes.com/business/financial-services/bankers-politicians-and-tribal-royalty-linked-to-vbs-bank-looting-1.3672120>

Therefore, the internal audit plan can shed light on a crime. Likewise, if a transaction was hidden from PwC during its internal audit, it could use the internal audit plan to prove its innocence. So, why are PwC and the other bodies I've mentioned that have access to the audit plan **refusing me access to this document?**

And do you think for a minute that PwC, upon exercising its duty as internal auditor, doesn't have mechanisms/safeguards built into its audit plan as a way of proving its innocence should such a crime scenario ever arise? Audits are what they do all day long. Otherwise, they'd have no way of ever providing evidence when criminals use them in fraudulent transactions. And if the criminals know this, then we have a big problem.

Here's one last scenario directed just towards the former Irish Minister: suppose this Minister now (or up until now) resides somewhere abroad, say for example in a country like Russia since not long after this crime was committed. As I repeatedly asked in my [first Report](#) (p.73), so what's the \$50m being used for? Could some of this \$50m have been diverted (directly or on quid pro quo basis) to Russia which allowed this former Minister to pay his way into the Russian biotech/VC scene? This would mean the Irish taxpayer footed the bill to get this former Minister into the Russian VC game.

I don't know if the EU can compel the release of this internal audit plan since PwC is an international firm? A large organization like PwC allowing one of its national branches practice this way without intervening in an ethical manner says a lot about this firm.

Just be aware, if PwC or any other auditing firm is in some way involved in your business contracts and you end up on the wrong end of the stick like I was, you may just have to take the loss (I hope you have a healthy balance sheet) or have no choice but to make a compromise that you never expected. You can forget about the PAB's, their not going to do a damn thing about it. Maybe you can save some money by putting in place some preventative measures/procedures that might protect you?

Ireland's Justice System

Major new anti-corruption and anti-bribery legislation was introduced in 2017. This all sounds great, but the only measure of the effectiveness of this type of legislation is the number of Irish Government officials held accountable. **How many members of the Oireachtas (Irish Parliament) have served a prison sentence?** Ray Burke, an Irish former Fianna Fail politician, was sentenced to six months in prison on 24 Jan 2005, making him one of the most senior Irish politicians to serve time in prison (or more accurately, in jail). Excluding those related to the Troubles, there have not been many (you could count them on one hand) imprisonments of other Irish politicians since 1923, and those that were imprisoned served at most a few months.

If you were to ask the same question here in the US, how many government officials (both Democrats and Republicans) and high level corporate executives would you find have been held accountable? Relatively speaking, many more.

Why did Charlie Flanagan have to introduce new anti-corruption anti-bribery legislation if the old legislation was so effective? Surely, the old legislation could have held at least one Irish Government official or staff member accountable however flawed the legislation was?

If you're bringing out new legislation because the old legislation wasn't effective (nobody was held accountable), then somebody will have to be held accountable under this new legislation over the coming years, otherwise why the need for new legislation? Statistically, there will be some correlation among nations in terms of the types and numbers of crimes by Government officials, so where do we get this information so that we can reference the Irish Government's record vis a vis that of other nations?

So, if you want to determine the effectiveness of this new legislation, ask the same question above (in bold) two, five, or even ten years from now, but I'll guarantee you, you'll get the same answer. As I said in my update Report, the make believe world of words, words in this case likely to try and make us look good now that Ireland is seeking an elected seat on the UN Security Council in June 2020 for the 2021-2022 term. Its campaign is premised on three themes: Empathy, Partnership and Independence...whatever that means?

The Irish Government and high level Irish executives never have a problem comparing their compensation to that of their peers in other nations in order to justify an increase, so let's do this comparison across the board and hold Irish Government officials and Irish executives accountable in alignment with practices in other nations. They might not be so quick to make comparisons in future!

Below is a link to an article on CriminalJusticeSchoolInfo.com that I found interesting:

<https://www.criminaljusticeschoolinfo.com/crimes-government-officials.html>

So, what motivates Irish Government crimes? What motivated the crime in my case?

Veronica Guerin worked for Fianna Fail for a time, the same political party that was involved in the theft of at least \$50m via Innovation Fund Ireland ten plus years after her untimely death. We need a lot more people like Veronica Guerin in the Irish Government or the Irish Nation is going to be in trouble. The Irish Government is no longer run by those brave people involved in its formation, or people like Veronica Guerin, it's unfortunately sadly lacking in this 'Department'.

Words don't an effective justice system make, results do.

When you have selective justice, it can give the impression that the justice system is healthy. But it's not. You're only hearing of those cases that don't represent a threat to the Irish Government. As I mentioned in my

Reports, **protection of corruption** by the Irish Government is a major threat to Irish citizens. So too is **selective justice**. It only holds those the Irish Government doesn't care about accountable.

Why do Irish law firms seemingly act to protect criminals and the Irish Government? Matheson, one of Ireland's largest law firms, through a new app advises companies on white collar crime raids ([Print Screen](#)).

However, we are making some progress. A recent (Dec. 2018) Irish Times article stated in part: "Public bodies such as the Workplace Relations Commission must have the jurisdiction not to apply a rule of Irish national law that is contrary to EU law, the Court of Justice of the European Union has ruled."

On the other hand, none of the lawyers that according to Transparency International take actions against the state got back to me.

The only way you as an investor can be confident in Ireland's justice and oversight system is when you see Government officials and high level corporate executives being held accountable. This is the only true measure that the system is working. Having a legal system in words is meaningless, practice as we all know is what counts.

I found the following article very humorous (not the article itself but the thought that Ireland could be a hub for dispute resolution considering my efforts to resolve my case as per p.61 of my [first Report](#) (second quote below):

<https://www.irishtimes.com/news/crime-and-law/ireland-can-be-hub-for-dispute-resolution-after-brex-it-says-judge-1.3628545>

The article (link above) states in part: "Brexit will create a significant opportunity for Ireland to become a centre for international dispute resolution, the Chief Justice, Frank Clarke, has said in a speech in the United States."

My first Report stated in part:

"Bottom line though, not one Irish law firm has offered to provide me with an expert legal opinion on my case, nor have any of the 'distinguished' bodies and professionals mentioned above, the Law Society of Ireland (not even a response) or most of the mediators listed on its website, provided me with even a referral to someone who can provide me with a legal opinion." (p. 61 Report)

Another article demonstrating the Irish Government's liberal use of constitutional device:

<https://www.irishtimes.com/opinion/government-blocking-of-legislation-is-constitutionally-dubious-1.3924971?mode=sample&auth-failed=1&pw-origin=https%3A%2F%2Fwww.irishtimes.com%2Fopinion%2Fgovernment-blocking-of-legislation-is-constitutionally-dubious-1.3924971>

And, one last article regarding judicial appointments:

<https://www.irishtimes.com/news/politics/oireachtas/european-body-urges-government-to-reconsider-bill-to-appoint-judges-1.3554310>

It states in part: "The Government has been warned that its controversial Judicial Appointments Bill is not in line with European norms.

A report by an anti-corruption Council of Europe body has expressed concern about the move to create a judicial appointments commission with a non-legal majority and a lay chairperson and has asked the Government to reconsider the provisions.

It call for the State to reassess the issue "in order to limit potential risks of improper influence from the executive/political power over the appointment process to the judiciary".

Sure, why not corrupt the Security Council while we're at it! How will or is the Irish Government influencing the EU if this behavior is the norm within the Irish Government?

When we see the law not working, a double standard, people tend to decide what the law is, what justice is, and that's the danger when the Irish Government doesn't practice what it preaches. The Roscommon eviction case is a recent example where the community took matters into their own hands against a bank and a security company to protect an Irish family. Wasn't there a saying that went something to the effect that the people (general Public) will only be policed as far as they want to be policed? That said, I have great respect for most police officers, who put their lives on the line for us every day, so we can only be very grateful to the NYPD and all the other Police Departments.

Regarding the usurping of the New York City St. Patrick's Day Parade case mentioned in my [update Report](#) (p.218, and I have to mention it a second time), this seems to be a simple case of bylaws that should be resolved expeditiously in my opinion. The case doesn't seem to have been resolved (based on my inquiries). It wouldn't surprise me if the Irish Government was unduly trying to influence this judge to hold off on his ruling (if Irish judges are anything to go by), perhaps until some of the more senior influential members who are fighting against this usurping become weary or even die off, although this is no reflection whatsoever on the judge in this case who I have no doubt has a stellar reputation.

Perhaps judges in Ireland can be unduly influenced into doing what their social circle, those who have access to them, request, but this certainly won't be the case here. This judge I believe will rule based upon the facts, as immediately as possible.

Tourism Ireland (Irish Government Agency) wants to take control of this parade to showcase Ireland to the world as a vacation destination (particularly now with Brexit looming) and will take it any way they can.

But, if attempts are being made to try and influence this judge, what other areas can the Irish Government try to influence other US judges that could potentially negatively affect US citizens should one of these judges be inadvertently swayed based upon inaccurate information? It's not right that something can be taken away from the Irish community who have worked very hard for it over many years (decades), and then the community has to beg to get some of it back and be put through the grinder in the meantime, albeit a fair judicial process.

Irish Solicitors/Lawyers

In order to try and hold the legal profession in Ireland accountable, I decided to reveal the name of the lawyer who had replied to my request for a legal opinion on my case with the words "Go fuck yourself" ([first Report](#), Section 5). However, I will consider accepting independent legal opinions on my case from certain Irish lawyers/solicitors as an alternative. Therefore, I ask the following lawyers for a legal opinion on my case, the reason I choose these particular lawyers/solicitors is because their replies as detailed in my first Report seem incomplete (names below and revealed, except list of solicitors in 5. below, on p.221 of my [update Report](#)):

1. Under (a) p. 51: Deirdre Dunne, Partner | Head of Business Development, Matheson, 70 Sir John Rogerson's Quay, Dublin 2. Deirdre.Dunne@Matheson.com
2. Under (e) p. 54: Patrick Quinlan, Partner, Maples and Calder, Dublin. patrick.quinlan@maplesandcalder.com
3. Under (i) p. 60: David Phelan, Managing Partner, Hayes solicitors, Lavery House, Earlsfort Terrace, Dublin 2. dphelan@hayes-solicitors.ie
4. The lawyer on page 52 of my [first Report](#), (c), (name not revealed in my update Report)
5. The list of solicitors provided to me by Transparency International Ireland who take actions against the State. Not one of these solicitors replied to my recent request for a legal opinion on my case – see [list](#)

I would like an honest legal opinion on my case (as part of your pro bono work) per the three main areas of investigation as detailed in my email communication ([Attachment 1](#)) to the Taoiseach, Garda Commissioner and DPP, and for you to try and compel the release of the internal audit plan between the NTMA/NPRF and PwC.

Such opinions will not only inspire confidence in the integrity of the legal profession in Ireland, hence there will be no need for me to publicize this lawyer's name, but also assist me in holding the Irish Government accountable, which has been the whole purpose of my investigation/Reports since the beginning. Why should one Irish lawyer have to bear a burden that should be borne by a properly functioning legal system and profession?

The only other option open to me to try and exact some change (accountability) is to let the Irish Public decide. (after all, that's what I've been appealing for regarding the practices of PAB's, in particular IAASA, who seem to find it difficult to inform the very people they're meant to protect, the Public, and it's all I've got to go on to assist the Irish Public).

This of course won't be required if I receive honest legal opinions from the above lawyers as such opinions will demonstrate, among other things, that this change has already occurred.

I have no confidence in the Law Society of Ireland to hold this person accountable aside from a slap on the hand type of punishment done out of public view. I heard on the grapevine that members of the Law (Solicitors) Society of Ireland frown upon any member who deviates from Law Society consensus as regards holding any of its members accountable, which if true, and should I receive the above legal opinions, will further add to confidence in the integrity of the Irish legal profession.

I believe the Law Society recently sought to discipline tens of Irish lawyers, but I don't know what the outcome was. I'm guessing this was just window dressing again for the Irish Government's attempts to win an elected seat on the UN Security Council and portray itself (inaccurately) as a hub for dispute resolution post-Brexit.

Foreign Direct Investment (FDI)

We need to take the Irish Government out of the picture (enterprise agencies IDA and EI) and set up private organizations to develop indigenous business in Ireland. This way we protect the Intellectual Property of multinationals from being abused by the Irish Government and their proprietary information being shared with competitors, like in my case where my group's FDI project was reverse engineered and no doubt its structure and other important information shared among the biotech industry in Ireland.

Take the [Connect Ireland](#) initiative for example, an initiative set up to attract international companies to Ireland. This was a community based initiative that offered an incentive to anyone who referred a company that ultimately set up operations in Ireland. Terry Clune, its founder and CEO of Taxback, is now locked in a bitter dispute with IDA Ireland, one of the Irish Government's enterprise agencies (surprise surprise!). IDA Ireland has treated Terry Clune in a terrible manner regarding the Connect Ireland initiative. This initiative was set up not long after my efforts to bring FDI to Ireland, and I know that Terry was "avidly" following my case.

Irish Government agencies collectively have a history of bad performance (could you imagine a private firm with such a history) and so there's a great opportunity for private companies, independent of the Irish Government, to enter this space. Like Connect Ireland, these companies could provide a similar type of referral fee not funded by the Irish Government.

My case and subsequent Connect Ireland case clearly show that the IDA/EI process is inherently flawed and indigenous industry can only be successfully developed to scale using private sector means, just like SpaceX and other private sector endeavors (IDA CEO Martin Shanahan recently declined an invite to attend an Oireachtas Jobs Committee concerning the end of the Connect Ireland initiative).

See <https://www.rte.ie/news/2017/0322/861648-connect-ireland/>

and <https://www.independent.ie/business/jobs/ida-criticised-as-connect-ireland-job-figures-upped-35883854.html>

The reason IDA Ireland stopped the initiative is because Connect Ireland was showing them up. It was bringing in more jobs and demonstrating the incompetency of IDA Ireland and our enterprise agencies. This is why we need private initiatives/companies in charge of attracting FDI and developing indigenous business.

The following article discusses a request made by Connect Ireland for a formal independent investigation by the Irish Government, and for a value for money review into the project by the Comptroller and Auditor General...good luck with that!

<https://www.independent.ie/business/jobs/connect-ireland-boss-calls-on-tanaiste-to-open-investigation-into-ida-jobs-row-36227401.html>

Perhaps the article below emphasizes the fact that ultimately we don't need these government agencies directly involved in FDI (obviously we need government policy in this regard to incentivize), it will happen quite naturally using private enterprises like for example Connect Ireland and Opportunity Ireland who can do a significantly better job. Multinational companies make their own decisions and will use any country for their own benefit. Private organizations can attract FDI **that develops indigenous industry**, companies that won't up and run for some extra profit.

<https://www.irishtimes.com/business/economy/fdi-to-republic-takes-steep-dive-under-trump-tax-reforms-1.3668337?mode=sample&auth-failed=1&pw->

[origin=https%3A%2F%2Fwww.irishtimes.com%2Fbusiness%2Feconomy%2Ffdi-to-republic-takes-steep-dive-under-trump-tax-reforms-1.3668337](https://www.irishtimes.com/business/economy/fdi-to-republic-takes-steep-dive-under-trump-tax-reforms-1.3668337)

Of more concern to me is the question of whether the Irish Government (or its close associates) can access confidential information/data held by US companies that are based in Ireland that can then be passed along to others on a preferential basis? If all these multinationals (Google, Facebook etc.) now have their European/international headquarters in Ireland, obviously all top level strategic decisions are made from there as well as servers located nearby.

Are US citizens exposed to this risk when these mega corporations move to Ireland for tax purposes? It's easy to identify the key person within these corporations, particularly those with Irish ancestry if a US citizen, who have access to servers and confidential information, and wine and dine them to develop a cozy relationship, the same MO the Irish Government uses to develop cozy relationships with Irish oversight institutions and others. It all works on the nod and a wink system. **Whenever anything is removed from its source, there's always the likelihood of compromise.**

Conversely, the Irish Government led Apple up the garden path for years regarding its new billion dollar facility, which is a risk to other multinationals.

I wonder if all this adoration by the Irish Government for US multinationals has something to do with our past over-reliance on the tourism sector? I remember when I was single digits being cognitive of the importance of being very welcoming to US tourists, or the Yanks as we used to affectionately (never pejoratively) refer to them back then. We would always wave at the tour busses full of US tourists as they drove by us on their way to explore all that Ireland has to offer. Perhaps, this was more pronounced where I came from, the beautiful city of Limerick, which was only a hop, skip, and a jump from Shannon Airport, the main hub in Ireland for international arrivals.

Incidentally, my first family home was next to a hotel or motel at the time where a lot of US tourist used to stay. So, as young ones we had a huge back yard always playing around (and inside) the hotel grounds, and getting kicked out just as often. Maybe this is why I ended up working in the hotel industry for a time here in the US?

On another note, I'm unable to pull up the articles by clicking on the links immediately below to my Opportunity Ireland initiative on the Epoch times. I see a Failte 32 article ('Luck of the Irish') from around the same time still accessible (see [Print Screen](#)). In fact, unrelated articles on Epoch Times go back to 2009 (see [Print Screen](#)).

This is the same Opportunity Ireland that the Irish Government used without my permission until I effectively told them not to, perhaps they got the Epoch Times to scrub it into oblivion for something in return? I suppose there's no reason to scrub out the Failte 32 article, but Opportunity Ireland, like Connect Ireland, might have been seen as a 'threat' to Ireland's enterprise agencies as they don't want these initiatives to give others ideas?

http://printarchive.epochtimes.com/a1/en/us/nyc/2012/03-Mar/16/B01_EET201203116-NY-US.pdf

<http://www.theepochtimes.com/n2/life/discovering-ireland-through-joint-ventures-207494.html>

http://english.ndtv.com/ntdtv_en/news_business/2012-03-03/operation-opportunity-ireland-to-bolster-the-economy.html

Even the NDTV link directly above has been removed, even though there are other unrelated articles still up on NDTV from 2011 (see [Print Screen](#)). Is this due to the reach the Irish Government has to suppress articles that

everyone has a right to read? You used to be able to pull up the first link above **after** it was print archived but now need a password - very important to password protect people from reading about my trademark! I even requested a copy from both the Publisher and Editor-in-Chief and never heard back from them.

I don't like people or organizations that seemingly bury the truth, and then pretend to be so righteous. The Epoch Times states: "It's bringing morality back to newspapers." (unless of course the Irish Government asks it to effectively delete certain articles?)

Note: In the 'Luck of the Irish' article above, I noticed an error in one of the quotes. In the last paragraph the reporter quotes 'I get that you're the right person.' What I said was "I'll get you to the right person." But the rest of the article is pretty accurate for a reporter who didn't take written notes.

Irish Government Interference in US Elections

The Irish Government seems to be as good as the Russians when it comes to influencing US elections. The Irish Government has always supported just one party here in the US (and my Reports are always apolitical).

I was even introduced in the past to a 'bundler' who supported this US political party by a former Irish Government official (Consul General) at an informal meeting of the board of a new social and business organization effectively led behind the scenes by the Irish Government. I later realized that the bundler's likely role in this new network was such as to identify potential political donors for this US political party as opposed to any active role in the running of the network (of which he had very little if none in my opinion).

There was no other reason to be personally introduced to this person over everyone else on the board, to whom I was introduced collectively and who were playing a very active role in the formation and running of the new network, because introductions made on my behalf in the past by this Government official had direct relevance to the organization to which he was introducing me.

This may sound a weak argument, but if you know this former Irish Government official, you'll understand that his introductions are always very purposeful in his role connecting the community, and there was no reason for this introduction (to the bundler) related to the new network (foreseeable or planned). And, I've also experienced this former official's careful guarding of those to whom he doesn't want you introduced. And, I did contribute to this political party a short time later and was even asked by the bundler if I was interested in joining a fundraising event committee and bringing in other guests. Like many bundlers in my opinion, they over-promise and under deliver, but I digress.

Do we want other countries taking a leaf out of the Irish Government's book and effectively influencing US elections, possibly more effectively, legitimately. If I were the US on the other hand, regarding election interference, I'd also be focusing on other players such as the Irish Government which is 'legally' indirectly influencing elections right under your noses, which may have the same impact as Russian interference. I've already informed some members of Congress of this.

The network was originally named the Young Professionals if I remember correctly, and was an Irish Consulate (NY) initiative wherein it was incubated, after which it was handed over to a group of us (most if not all 'off the boat' Irish) to develop into a more mainstream organization as the Irish Government didn't want to be seen to be competing with existing Irish community organizations, but they were still very much involved in its direction.

Another time, a few years after my 'bundler' experience, the network newsletter was used to support a candidate (same political party) for local elections. I expressed my concerns about this at the time including bringing it to the attention of the former Government official. That is, my first reaction was to bring it to the attention of the former Irish Government official.

The Irish Government can tap into a huge Irish American base, likely well beyond the influence Russia can bring to bear in its disgusting efforts. Have any of you heard of any US citizens in Ireland with close ties to the US Government bundling campaign funds for any Irish political party? This is now my adopted country and I sure as hell don't want any country meddling in our elections, particularly when the Irish Government won't even allow the Irish Diaspora vote in its elections!

Further Observations and Recommendations

Regarding the 2008 financial crash in Ireland, my question is, why didn't the Irish Government or for that matter anyone else in influential positions listen to those very few economists who had warned them? What does this tell us about economists? Why didn't the Irish Government heed the warnings of some Irish economists? If these economists were and are so good, and had a pattern of accurate forecasts, wouldn't the Irish Government have acted on their advice? So, it seems the Irish Government had little confidence in Irish economists. So how do we correct this?

Next time you take an economist's advice, make sure they've got skin in the game, let them put their money where their mouth is so that you know they believe in their own forecasts/predictions, just like for example in the financial services sector where financial advisors are aligning their client's interests with their own i.e. if a client's portfolio declines in value, so does the advisor's fee, whereas advisors make more money when their clients do well. But what skin in the game? I don't know, I don't have all the answers.

But, you'll always hear the one correct prediction from these economists and never the other one hundred wrong ones. I want to at least see a pattern of correct forecasts/predictions. Perhaps economists should have to disclose their investment holdings or other important personal financial transactions that will show a correlation between their forecasts and their own personal financial actions. For example, if an economist is forecasting 'all quiet on the western front' while at the same time putting everything they own into gold, we may want to question their economic analysis. What reason would they have for doing this? Consensus?

Also, maybe you should also check with your favorite bookie when you're betting on the ponies, I wouldn't replace economists with bookies (neither did they predict the crash) but I'd always listen to them. Forget consensus, we all saw how that worked out not long ago regarding research units in investment banking firms, this is what sheep do (yes, actual sheep), and remember, all the financial giants collapsed together like sheep jumping off a cliff.

John Paulson, hedge fund manager, bet on the crash over many years before the market crash and made approximately \$4bn for himself. I believe some banks even accommodated his contrarian strategy, which effectively was selling the deals to investors without telling them that someone was shorting on the other side. You should be listening to people like Paulson, not the central banks, economists et al, to see where these guys are heading. In Ireland, the central bank will protect everyone but the Public as will all the PAB's.

Think about it, a bubble isn't a very difficult thing to see, even for those of us without the resources of a central bank. In fact, it's usually repeatedly slapping you in the face figuratively speaking before the ultimate crash. If you see house prices going through the roof, this is normally a red flag for example (in addition to seeing all these house flipping seminars/ads all over your TV set).

I didn't get back to visit Ireland for about seven years or so after emigrating. And, I get back whenever I can, perhaps a few years between visits. I was lucky because when I returned, I couldn't believe how house prices had increased so much. I saw the prices of houses I knew sold for around €80-90k before I left now selling for over €200k. I wouldn't have been able to justify purchasing one as a possible long-term rental property, even with the Irish banks dolling out money like there was no tomorrow.

In fact, I was very surprised when I visited an Irish bank during the Celtic Tiger to inquire about a loan. They were saying yes to everything I asked, I initially thought it was a type of pre-sales ploy (like those marketing letters you always get that tell you you've been pre-approved for tens of thousands only to be told go jump in a lake when you apply), as one used to putting on my best polyester suit and being on my best behavior when visiting the bank manager before I emigrated. The point being, we need an outside perspective sometimes so that we're not carried along with the madness.

As regards oversight in Ireland, there are too few degrees of separation in Ireland to have effective oversight.

I've included the Securities and Exchange Commission's [reply](#) to my Reports to compare it to ICAI's and the other responses I've received down through the years regarding my case, as it at least represents action taken.

It represents an attempt by me to get meaningful oversight outside of Irish oversight bodies. I've no doubt there will be oversight by the SEC to ensure the Irish Government never again takes advantage of US investors/citizens the way it does its own citizens. The offer of funding by the Irish Government to foreign entities should be regulated just as the offer and sale of securities is strictly regulated here in the US. This way, oversight is now put in the hands of these foreign nations, thus bypassing the need for the involvement of Irish oversight bodies in overseeing these types of funding transactions, for which they are not capable of doing.

And, if the Irish Government insists the EU have its back when it comes to Brexit, shouldn't the EU then be able to insist that it be allowed oversee its funding activities?

Take a look at the semi-annual audit report by the NSA Office of the Inspector General (link immediately below) whose function in part is to conduct performance and financial audits in accordance with standards established by the Comptroller General of the United States.

First, you'll notice in the Table of Contents reference to their Whistleblower Program. And on the very first page of the Executive Summary, under the first heading 'Audit Division', first sentence, it states, "During the six-month reporting period, the Audit Division issued nine final reports with a total of 44 recommendations to improve Agency operations."

The heading after the Executive Summary is titled (p.3):

"SIGNIFICANT PROBLEMS, ABUSES, AND DEFICIENCIES AND OTHER SIGNIFICANT REPORTS IN THE REPORTING PERIOD"

It's very reassuring to see this type of transparency upfront, and all developing (Ireland) and developed nations should follow this standard.

https://oig.nsa.gov/Portals/71/Reports/SAR/OIG%20UNCLASS%20SAR%202nd%20Half%20FY2018_FINALE%2020JUL18.pdf?ver=2018-09-07-115021-997

Why doesn't Ireland have an Inspector General? The US has a Comptroller General as does Ireland, but the US also has an **Office of the Inspector General** that can investigate waste and fraud by government agencies. And who's overseeing Ireland's Comptroller and Auditor General?

Finally, what's the cognitive dissonance at work here when even if you're an honest businessperson who would correctly cut off ties with any one you found to be corrupt, in the case of the Irish Government you continue to do business with them? How will the Irish Government ever get the message if there are no consequences? I suppose, in fairness, you've got such a difficult decision to make: continue doing business with them because you're getting, or might get, money from them, or tell them to get lost...very difficult decision for an honest businessperson to make!

But I think I get it now. The reason the Irish Government and Irish oversight bodies don't view my Reports as a threat is because they would as soon attract those of like mind as they would honest reputable companies.

Anything I've said of course is no reflection on the Irish people themselves. The Irish people have a lot of courage, take for example people like **Veronica Guerin**, who I'm sure represents many of our Irish women, our mothers, our sisters. We should never forget this woman. I'd like to see more reminders of Veronica Guerin around Ireland so that Irish children are continually exposed to her great example.

I'm not necessarily talking about statues (there is one in Dublin Castle gardens and I'm sure there are some others around the country), although we have plenty of statues of Our Lady all around Ireland which have offered the Irish people much composure down through the years (except when they started moving :), but broader educational exposure.

According to Wikipedia:

A memorial statue to Guerin is located in Dubh Linn Gardens, in the grounds of [Dublin Castle](#).

On 2 May 1997, at a ceremony in [Arlington, Virginia](#), her name and those of 38 other international journalists who died in the line of duty in 1996 were added to the Freedom Forum Journalists Memorial. Her husband addressed the audience: "Veronica stood for freedom to write. She stood as light, and wrote of life in Ireland today, and told the truth. Veronica was not a judge, nor was she a juror, but she paid the ultimate price with the sacrifice of her life."^[9]

In 2000, Guerin was named as one of the [International Press Institute](#)'s 50 [World Press Freedom Heroes](#) of the past 50 years.^[24]

In 2007, the *Veronica Guerin Memorial Scholarship* was set up at [Dublin City University](#), offering a [bursary](#) intended to meet the cost of fees and part of the general expenses of an MA in Journalism student who wishes to specialise in investigative journalism.^[25]

Remember: Don't expect the Constitution to work if you're not willing to give something back.

Recent Developments

I contacted the Taoiseach (Irish Prime Minister), Garda (Police) Commissioner and Director of Public Prosecutions (DPP) in a final attempt to have my case investigated. I asked these people not to pass the buck, after all Innovation Fund Ireland (IFI) was a Department of the Taoiseach initiative. I only heard back from the Taoiseach's Department, and they passed the buck to the **Minister** for Finance **and** Public Expenditure and Reform. I believe the Minister then passed my case along to the NTMA although they never officially stated this.

The reason I say this is because I hadn't received a reply from the NTMA after my last reply to them almost two months earlier but received one after I had contacted the Taoiseach's Office - [Attachment F](#). I've included the continuation of my communication with the NTMA from [Attachment C](#), in addition to the communication I received from the Minister for Finance and Public Expenditure and Reform, in Attachment F, since I believe the NTMA's reply is a consequence of my communication with the Taoiseach's Office.

Perhaps the Minister for Finance and Public Expenditure and Reform can't now refer me to the NTMA/NPRF because PER (Department of Public Expenditure and Reform) didn't do so before based on the accounts of my communications with them as detailed in my [first](#) and [update](#) Reports (see summary Sections 3 & 4 first Report)?

Why didn't the Minister for Finance and Public Expenditure and Reform just refer my case to the DoF and NTMA instead of sending me a final email reply, which stated?:

"On foot of your email the National Treasury Management Agency (NTMA), which is a body under the Minister for Finance's aegis, has advised the Department of Finance that it strongly rejects the allegations made against the NTMA/NPRF in your e-mail, and is satisfied that the particular NPRF investment to which you refer was made in accordance with the legislation which governed the NPRF, i.e. the National Pensions Reserve Fund Act 2000 (as amended). The NTMA therefore rejects any suggestion of misrepresentation, illegal or unethical practices or wrongdoing on the part of the NTMA or NPRF Commission."

The NTMA already told me this in an email ([Attachment F](#)), so why is the Minister for Finance and Public Expenditure and Reform telling me this again if they didn't refer my case to the NTMA regardless of whether the NTMA is under the Minister for Finance's aegis? This seems to be 'backwards' procedure. As per page 30 of my [first Report](#) (p.29-32), it would seem the Department of Finance (DoF) **itself** bears ultimately responsibility for my case. But by referring me to the Minister for Finance **and** Public Expenditure and Reform, doesn't this bring ambiguity into it in that I don't know to which specific Department the Minister is referring?

I see they've now (re)combined Departmental functions to some extent where the current Minister for Finance is also the Minister for Public Expenditure and Reform, the same Minister over two different government Departments? Why establish the Department of Public Expenditure and Reform in 2011 and then put the same Minister over both Departments five years later?

I had referred to such a contradiction in my [first Report](#), p.27 (middle of page) and p.43 under heading "(d) Department of Public Expenditure and Reform". Perhaps they took their cue from my Report as it makes it easier for them to 'legitimately' cover up their crimes now without any sign of conflict? In the US, can you have one Secretary over two different US Departments?

And when they state in part above, "On foot of your email the National Treasury Management Agency...", properly worded they should have said "On foot of your email **to** the National Treasury Management Agency, the National Treasury Management Agency, which is..." I just don't trust these guys with words.

So, the current Taoiseach's response to my request for an investigation is that he ignores my request not to pass the buck, and effectively forwards it to two Irish Government Departments, the Department of Finance and the Department of Public Expenditure and Reform (PER), the same department that effectively told me to take a hike back in early 2015 when I asked them to investigate my case (p. 25 [first Report](#)).

So, I've now been sent back to where I started years ago - mind boggling! I suppose this is what's known as 'coming full circle'? I made the same request of the Department of Finance around the same time, and you can jump on their merry-go-round starting on p.26 of my [first Report](#) (see also Section 4).

And the NTMA/NPRF at the time was forced by the Information Commissioner to release a document (p.53 [update Report](#) - see under heading 'Conclusion', 2nd paragraph, first sentence, attached 'NTMA - NPRF Decision') that I had thought provided proof of my case but which never even got past SIPO's 'assessment' stage to determine if an investigation was warranted.

Even though the Taoiseach referred me to both the DoF and PER, PER, as per the above can't say anything to me that it hasn't already said (i.e. take a hike), therefore it seems the Minister for Finance and Public Expenditure and Reform had no choice but to informally contact the NTMA and get them to respond to me which PER couldn't officially do since it never referred me to the NTMA in the past (the DoF did).

Fortunately for the NTMA, they could reinstate a series of communications they recently had with me and which they had ceased (the Minister knew of these communications from my letter to the Taoiseach, Garda Commissioner and DPP - [Attachment 1](#)) and pretend that they were just continuing the conversation with me.

They had asked me in these communications if I wanted to commence the FOI process to try and release the audit plan, and I declined (email to them on July 9, 2019, [Attachment C](#)), and they didn't reply to my second request for a copy of the audit plan (within same email) nor my follow up email on July 17 asking them what they were going to do about it now that I had informed them that PwC, ICAEW and ICAI likely lied about the internal audit plan's scope of services, hence the reason they weren't going to get back in touch with me until the Minister very likely recently got in touch with them. The NTMA can now bury the evidence that will prove my case in its FOI process ([Attachment F](#)).

I suppose the ultimate point I'm making here is that it seems the Minister wants to keep the DoF directly out of this for some reason. He couldn't have the Department of Public Expenditure and Reform itself refer me to the NTMA, and he didn't want the DoF involved.

I finally received 'something' from the NTMA FOI Unit, a 'power point' presentation seemingly of PwC's audit plan for the NPRF for the year ended December 2010 ([Attachment F](#)). I don't know what to make of this document, whether it was put together last month, what was added/subtracted from it. But, because it's not even close to what I had asked for, you can be sure that all the suspicions I had of the NTMA's motives were correct and on point ([Attachment C](#) and [Attachment F](#)).

When I questioned them about it in my reply, they told me that searches were conducted and the only records located were the three audit plan presentations which were released to me in full in the email dated 25 September 2019.

There's nothing in the scope of services that's confidential, only technical information, otherwise PwC (and the PAB's) wouldn't even have been able to inform me that my case was outside its scope of services.

End

The audit plan document the NTMA FOI unit should release to me (but very likely will never) will either have the scope of services redacted or unredacted. Therefore, you will hear back from me again as follows:

a. In December 2019, to reveal the name of the Irish lawyer that according to the Law Society of Ireland "responded with an obscene message" to my request for a legal opinion on my case unless I receive a legal opinion from **all** of the lawyers mentioned above before then.

b. After I receive the audit plan scope of services in non-redacted form from the NTMA FOI unit (very likely not going to happen. It's clear from what the NTMA FOI Unit released to me that they're protecting those involved in this crime relating to my case). I'm assuming the same timeframe will apply as my appeals will be exhausted by then, around mid-December.

So, in summary, you will definitely hear back from me one way or the other in December, either revealing the name of the lawyer or the general conclusions from each of the legal opinions I receive. Included in this brief communication you receive from me might also be a copy of the audit plan scope of services unredacted, but this is highly unlikely since the NTMA is doing everything possible to protect those involved in this crime.

My Reports have demonstrated on more than one occasion that the Irish Government and Irish oversight bodies will always wait to see what you've written first so that they'll have the benefit of hindsight when responding (and this no doubt applies to Irish lawyers too). So, I've left out one or two items from my Final Report just in case they may demonstrate a contradiction in any future replies I might receive.

So, I've done all that I can do regarding my case. If any of you reading my Reports have the power and resources to take it further, please feel free to do so, and I'll give you any assistance I can. I've made your job easy in that **all you have to do is compel the release of the audit plan scope of services.**

In terms of recent US political developments, if the House of Representatives had to go through the stonewalling I've gone through over the years by the Irish Government, I've no doubt the House would be making some serious inquiries. I couldn't imagine the Irish Government releasing a transcript of a conversation with a foreign power, it would never happen.

Anyhow, to end, I've obviously lost a lot of respect for our current Taoiseach, he's gone down a lot in my estimation, based upon recent developments related to my case. He's no different than the rest of them...

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