

2 Dair Ard,
Boreen Hill,
Enniscorthy,
Co. Wexford,
Y21 YT57.

30th May 2025

Minister James Browne,
Minister for Housing, Local Government and Heritage,
Minister's Office,
Department of Housing, Local Government and Heritage,
Custom House,
Dublin, D01 W6X0.

By email to minister@housing.gov.ie, copied to james.browne@oireachtas.ie.

Protected Disclosure – Laundering of Property Belonging to Victims of Unlawful Mortgage Transfers.

Dear Minister Browne,

I am reporting the enclosed wrongdoing for your personal attention under cover of this Protected Disclosure made to you within the meaning of the Protected Disclosures Act 2014 (as amended). For the avoidance of doubt, the information relating to the wrongdoing was acquired by me through my work as Enforcement Director at Riar Ceartais Teoranta which is a specialist advocacy organisation established to tackle serious issues affecting people arising from unlawful or unfair public or private sector practices or corruption.

On 19th February 2025 I sent the enclosed Protected Disclosure to the Minister for Finance, Paschal Donohoe. My Protected Disclosure warned of serious liquidity risks for the Irish banking financial sector arising from the unlawful securitisation and transfer of mortgages (“Mortgage Transfers”) to non-banking entities/shadow banks (aka ‘Vulture Funds’) in deliberate and intentional breach of EU law.

That Protected Disclosure enclosed a copy of my 14th February 2025 GDPR letter to the Tailte Éireann Data Protection Officer (“DPO”). On 20th February 2025 I sent a copy of that 14th February letter to every Member of the Tailte Éireann Board for the purpose of ensuring they are aware of the situation and for the purpose of affixing them with personal liability should they fail to act to address the matter.

Sections 3.1 and 3.2 of my Tailte Éireann letter set out why in my opinion the unlawful Mortgage Transfers constitute criminal conduct, *inter alia*, offences under sections 145(1) and 146 of the Data Protection Act 2018 (as amended) and sections 7, 9 and 18 of the Criminal Justice (Corruption Offences) Act 2018. Within the meaning of section 7 of the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 (as amended), section 3.3 set out why in my opinion that criminal conduct is used to facilitate the laundering of property belonging to victims of unlawful Mortgage Transfers. Section 3.4 then set out why in my opinion the scale of the alleged State-wide enterprise-

level cartel established to facilitate the institutionalised laundering of property relating to unlawful Mortgage Transfers constitutes organised crime within the meaning of Part 7 of the Criminal Justice Act 2006 (as amended).

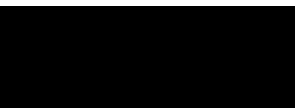
Any reasonable person will agree that my 14th and 20th February 2025 letters to the Tailte Éireann DPO and the Tailte Éireann Board Members concretely informed them about the systemic breaches of GDPR on the part of Tailte Éireann that is facilitating the alleged organised crime described above. Yet during the intervening period it is patently obvious that not only did those Tailte Éireann Officers do nothing to effectively halt the systemic GDPR breaches, but by allowing this unlawful processing to continue, they deliberately and intentionally caused victims of unlawful mortgage transfers to continue suffering intolerable pain, financial loss, ill health, distress, reputational damage and trauma that is driving some to contemplate suicide.

Prompting my enclosed 28th May 2025 letters to the Tailte Éireann DPO and to the Tailte Éireann Board, on 26th May 2025, the Irish Times reports¹ AIB planning further securitisation and transfer of mortgages valued at €500m. Any reasonable person will agree that Tailte Éireann is the statutory property registration gatekeeper charged with protecting people and their property from unjust attack. Yet not only are Tailte Éireann, its DPO and its Officers failing in that constitutional duty, but they arguably sit at the heart of what is likely the biggest money laundering criminal scheme in the history of the Irish State.

I am deeply fearful that the continued unlawful securitisation and transfer of mortgages in deliberate and intentional breach of EU law will trigger another 2008 scale financial crash of the Irish economy, if not the EU and global economies. In my opinion, the Tailte Éireann DPO and Officers' prior knowledge and failure to prevent the commission of this alleged organised crime will become material when considering *mens rea* and *actus reus* tests of criminal culpability. For example, should a future Banking Inquiry investigate their role in such a financial crash; and by extension, your role as the Minister accountable for Tailte Éireann. In that context, I note that for the purposes of the *Organised Crime Part 7* of the Criminal Justice Act 2006 (as amended), that section 70 of that legislation specifies that an "**act** includes omission and a reference to the commission or doing of an act includes a reference to the making of an omission".

As the Minister for Housing, Local Government and Heritage accountable for Tailte Éireann, I urge you to take immediate steps to prevent Tailte Éireann from facilitating any further laundering of property belonging to victims of unlawful mortgage transfers.

Yours Sincerely,



Colin Larkin

Enforcement Director,
Riar Ceartais Teo.

¹ <https://www.irishtimes.com/business/financial-services/2025/05/26/aib-weighs-sale-of-more-problem-loans-with-face-value-of-500m/>



Riar Ceartais

The administration of justice

contactus@ceartais.ie
www.ceartais.ie

Mobile: [REDACTED],

Email: [REDACTED]@ceartais.ie

2 Dair Ard,
Boreen Hill,
Enniscorthy,
Co. Wexford,
Y21 YT57.

28th May 2025

Mr. Damien Gorman,
Data Protection Officer,
Tailte Éireann,
Chancery Street,
Dublin 7,
D07 T652.

By email and registered post.

Our Ref: GRA/0225/01.

Dear Mr. Gorman,

On 14th February 2025, Riar Ceartais Teo (“RCT”) informed you and the Tailte Éireann Officers about systemic breaches of the GDPR on the part of Tailte Éireann that is causing members of RCT’s Article 80 GDPR Group Representative Action (“Members of the Group”) to suffer tens of millions of euro in damages, reputational damage, distress, ill health, generational trauma and significant economic and social disadvantage arising from Tailte Éireann’s unnecessary and disproportionate interference with their rights and freedoms.

Instead of implementing appropriate technical and organisational measures and safeguards to quickly and effectively halt the serious harm which the Tailte Éireann breaches are causing to hundreds of thousands of people, your 13th March 2025 response astonishingly claims that “*Article 80 [GDPR] **does not permit** a relevant entity to exercise a subject access request on behalf of an individual data subject, as against a data controller. As such, Tailte Éireann has no statutory entitlement to engage with you in respect of your request*” (emphasis and clarity added).

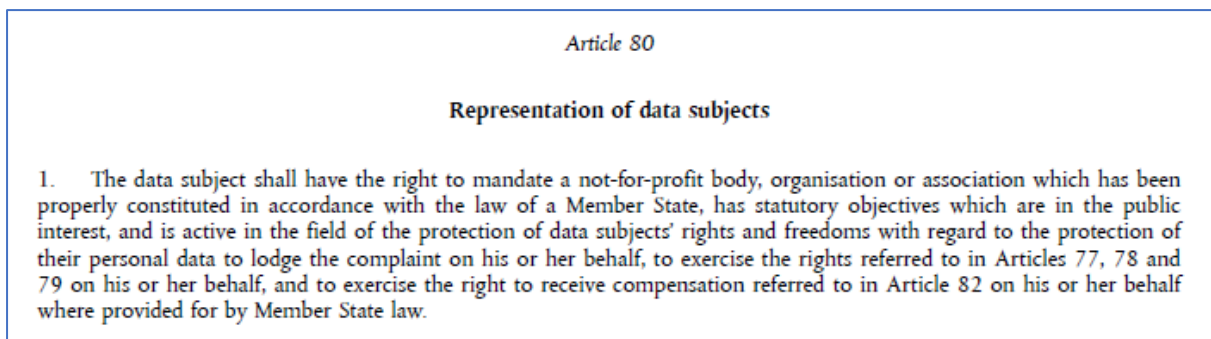


Figure 1 Article 80 GDPR text.

Aside from your failure and that of the Tailte Éireann Officers to halt the GDPR breaches being a remarkable dereliction of duty, as you can see from Figure 1, **Article 80 GDPR does not contain any text prohibiting any activity**, and it certainly does not contain text prohibiting a GDPR advocate like

RCT from exercising a data subject's rights. In fact, nothing in the GDPR serves to prohibit a data subject from authorising a third party to exercise their data protection rights on their behalf. For the avoidance of doubt, Article 80 GDPR simply clarifies that a specialist GDPR entity like RCT can *inter alia* exercise a data subject's Article 77, 78 and 79 GDPR rights on their behalf.

Regarding your claim that "*Tailte Éireann has no statutory entitlement to engage with you in respect of your request*", it is material that "*Representation of data subjects*" is the very title of Article 80 GDPR. While I haven't yet had a chance to refresh my memory on various CJEU judgments and Advocate General Opinions clarifying the Article 80 GDPR right of representation, the Collins English Dictionary supplies a relevant example which it uses to explain¹ "*representation*" (Figure 2) which states,

"if a group or person has representation in a parliament or on a committee, someone in the parliament or on the committee supports them and makes decisions on their behalf."



Figure 2 Collins English Dictionary definition of "*representation*".

But if I correctly understand your misinterpretation of Article 80 GDPR, just because that article does not explicitly state that an organisation like Riar Ceartais has the power to engage with a controller, you have chosen to interpret that to mean Riar Ceartais is prohibited from engaging with a controller in an effort to resolve an issue as part of its data subject representation. To be candid, if your misinterpretation had any merit, it would prohibit any consumer rights advocate from ever engaging with an organisation in an attempt to resolve a problem on behalf of a person.

Again, if I correctly understand your Article 80 GDPR misinterpretation, in circumstances where Article 80 grants Riar Ceartais the power to issue legal proceedings against a controller under Article 79 GDPR, you would have me believe that **Riar Ceartais can only issue proceedings against a controller without first engaging with the controller to give them an opportunity to resolve the problem.**

Notwithstanding that all Members of the Group have signed Representative Mandates providing their explicit written authority for Riar Ceartais to "*engage with the Organisations to try to resolve [their] concerns*", your implication that Riar Ceartais can only issue proceedings in strict accordance with Article 80 GDPR without first attempting to resolve the matter would clearly constitute the tort of abuse of process on the part of Riar Ceartais. Not only would that leave Riar Ceartais open to counterclaims, but such an abuse of process establishes prima facie grounds to have the proceedings struck out in accordance with Order 19, rule 27 of the Superior Court Rules², on the basis that proceedings were not necessary because Riar Ceartais failed to give Tailte Éireann an opportunity to first resolve what is a relatively straightforward problem before issuing proceedings.

¹ www.collinsdictionary.com/dictionary/english/representation

² www.courts.ie/rules/pleading-generally

In that context, it is material to note the inherent similarities between a data subject mandating Riar Ceartais to represent them under Article 80 GDPR, and a consumer represented by a qualified entity within the meaning of the Representative Actions for the Protection of the Collective Interests of Consumers Act, 2023. Reflecting the legal points set out herein, it is material that section 21 of that Act requires that (emphasis added),

(1) Proceedings shall not be brought in respect of a representative action seeking an injunction under section 23(1)(b), unless and until the qualified entity has engaged in prior consultations with the trader who is the subject of the proposed representative action in order to provide the trader concerned with an opportunity to cease the infringement that would be the subject of the proposed representative action.

(2) Before a qualified entity makes an application to bring a representative action before the Court seeking an injunction under section 23(1)(b), the qualified entity shall—

(a) request the trader concerned to cease the infringement specified in the request,

(b) request the trader concerned to enter into consultations with the qualified entity concerning the proposed representative action, or

(c) enter into consultations with the trader concerned with the aim of having the trader cease the infringement the subject of the proposed representative action.

Indeed, Tailte Éireann's refusal to engage with RCT in an effort to resolve the matter breaches the State Litigation Principles³ that *inter alia*, "the State will endeavour to avoid, prevent and limit the scope of legal proceedings wherever possible". In and of itself that unnecessary breach of the State Litigation Principles constitutes a breach of the 1st and 3rd GDPR principles of *lawfulness, fairness, transparency and data minimisation* and a breach of the Article 6(1) GDPR rules for lawful processing.

While a consumer rights advocate is free to choose the most suitable way to communicate a wrong to an organisation, it is material that the GDPR defines a set of data protection rights through which a controller can be informed of a GDPR wrong. For example, the Article 15 to 22 GDPR rights provide a framework through which inaccurate, disproportionate, unnecessary or unlawful processing can be reported to a controller.

But regardless of whether a controller learns of a GDPR processing issue through the exercise of data protection rights, **or otherwise**, *inter alia*, Articles 5(1), 6(1), 24, 25, 32, 35, 36 and 39 GDPR place legal duties, obligations and responsibilities on a controller to promptly correct a GDPR issue once it learns of a problem.

For example,

- Having identified unlawful or unfair processing of personal data, the Article 5(1)(a) GDPR principle of lawfulness, fairness and transparency places a legal duty on controllers to promptly correct their unlawful or unfair processing.

³ <https://assets.gov.ie/289006/1afd8f32-89f8-484a-9194-3dbd33af21c8.pdf>



- Having identified unnecessary processing of personal data,
 - the Article 5(1)(c) GDPR principle of data minimisation places a legal duty on controllers to promptly correct their unnecessary processing to ensure that it is “adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed”, while
 - **Article 6(1) GDPR automatically renders all of a controller’s unnecessary processing unlawful** without obtaining a data subject’s freely given, explicit, informed consent.
- Having identified the processing of inaccurate personal data, the Article 5(1)(d) GDPR principle of accuracy places a legal duty on controllers that “every reasonable step must be taken to ensure that personal data that are inaccurate [...] are erased or rectified without delay”.

I could describe the duties, obligations and responsibilities which *inter alia* Articles 24, 25, 32, 35, 36 and 39 GDPR placed on Tailte Éireann when it identified inaccurate, disproportionate, unnecessary, unlawful or high-risk processing, but the fact remains that regardless of how Tailte Éireann became aware of such processing, the GDPR placed an overarching duty on it as a controller to promptly bring its processing operations into compliance with the GDPR. For the avoidance of doubt, there are no circumstances where your inappropriate, misconceived and untrue claim that “Article 80 [GDPR] **does not permit** a relevant entity to exercise a subject access request on behalf of an individual data subject against a data controller” justifies Tailte Éireann’s failure to bring its processing into compliance with the GDPR.

When you and the Tailte Éireann Officers were informed about the systemic breach of the GDPR and the severe harm which that is causing to hundreds of thousands of people, any reasonable person competent in the GDPR will agree that my 14th February 2025 letter placed an overriding duty on you, and on the Tailte Éireann Officers, to take immediate steps to prevent victims of unlawful mortgage transfers from suffering any further harm. Yet during the intervening period it is patently obvious to any reasonable person that not only did you and the Tailte Éireann Officers do nothing to effectively halt the systemic GDPR breaches, but by allowing this unlawful processing to continue, you deliberately and intentionally caused victims of unlawful mortgage transfers to continue suffering intolerable pain, financial loss, ill health, distress, reputational damage and trauma that is driving some to contemplate suicide.

My 14th February 2025 letter clearly informed you and the Tailte Éireann Officers about the material relevance of, *inter alia*, sections 145(1) and 146 of the Data Protection Act 2018 (as amended) (“DPA18”), sections 7 and 111 of the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 (as amended), sections 7, 9 and 18 of the Criminal Justice (Corruption Offences) Act 2018 and the *organised crime* Part 7 of the Criminal Justice Act 2006 (as amended). This being so, in my opinion there can be little doubt that you and the Tailte Éireann Officers have deliberately and intentionally chosen to commit those alleged offences following that letter. As I fear the deliberate and intentional breach of EU law will likely trigger a systemic 2008 scale financial crash of the Irish economy, if not the EU and global economies, I understand such prior knowledge of those offences is material when considering *mens rea* and *actus reus* tests of criminal culpability should a future Banking Inquiry investigate Tailte Éireann’s role in such a financial crash.



To concretely dispel any doubt that the Representation Mandates supplied by Members of the Group *inter alia* authorise RCT to exercise their Article 15 to 22 GDPR rights and authorise RCT to “engage with the Organisations to try to resolve [their] concerns”, the postal copy of this letter enclose paper copies of the RCT Representation Mandates signed by all Members of the Group. But regardless of whether Tailte Éireann choose to facilitate the exercise of those data protection rights or not, your failure, and that of the Tailte Éireann Officers, to implement appropriate technical and organisational measures and safeguards that quickly and effectively halt the serious harm which the Tailte Éireann breaches are causing to hundreds of thousands of people, means that in my opinion, there can be little doubt that you and the Tailte Éireann Officers can now be held personally liable as accessories to torts committed by Tailte Éireann. For example, torts of fraud, duty of care, breach of duty, conspiracy and vicarious liability.

Without any further delay, I require that you and the Tailte Éireann Officers facilitate the exercise of the GDPR rights for Members of the Group and resolve the breaches by implementing appropriate technical and organisational measures and safeguards that quickly and effectively halt the serious harm which the Tailte Éireann GDPR breaches are causing to so many people. But any failure to quickly and effectively halt the serious harm which the Tailte Éireann GDPR breaches are causing to Members of the Group will result in you being named a Defendant in the ensuing proceedings that, *inter alia*, will seek to recover damages suffered by Members of the Group from you in a personal capacity.

As it is my firm opinion that your deliberate, intentional or reckless disregard for EU law when processing information relating to Members of the Group constitutes corruption within the meaning of the Criminal Justice (Corruption Offences) Act 2018, **TAKE NOTE** that appropriate Declarations and Orders will be sought preventing a third party such as the State from indemnifying you from your personal liability, or rendering harmless any effort to first recover damages suffered by Members of the Group from you in a personal capacity.

Yours Sincerely,



Colin Larkin

Enforcement Director,
Riar Ceartais Teo.

Mobile: [REDACTED],

Email: [REDACTED]@ceartais.ie

2 Dair Ard,
Boreen Hill,
Enniscorthy,
Co. Wexford,
Y21 YT57.

28th May 2025

Mr. David McGarry,
Chairperson of the Tailte Éireann Board,
Chancery Street,
Dublin 7,
D07 T652.

By email and registered post.

Our Ref: GRA/0225/01.

Dear Mr. McGarry,

I'm drawing your personal attention to the enclosed letter sent to the Tailte Éireann Data Protection Officer, Mr. Damien Gorman, the key points of which are summarised below.

On 14th February 2025, Riar Ceartais Teo ("RCT") informed you and the other members of the Tailte Éireann Board about systemic breaches of the GDPR on the part of Tailte Éireann that is causing members of RCT's Article 80 GDPR Group Representative Action ("Members of the Group") to suffer tens of millions of euro in damages, reputational damage, distress, ill health, generational trauma and significant economic and social disadvantage arising from Tailte Éireann's unnecessary and disproportionate interference with their rights and freedoms.

Yet during the intervening period it is patently obvious to any reasonable person that not only did you and the other members of the Tailte Éireann Board do nothing to effectively halt the systemic GDPR breaches, but by allowing this unlawful processing to continue, you deliberately and intentionally caused victims of unlawful mortgage transfers to continue suffering intolerable damage that is driving some to contemplate suicide

Your failure, and that the other members of the Tailte Éireann Board, to implement appropriate technical and organisational measures and safeguards that quickly and effectively halt the serious harm which the Tailte Éireann breaches are causing to hundreds of thousands of people, means that in my opinion, there can be little doubt that you and the other members of the Tailte Éireann Board can now be held personally liable as accessories to torts committed by Tailte Éireann. For example, torts of fraud, duty of care, breach of duty, conspiracy and vicarious liability.

Without any further delay, I require that you and the Tailte Éireann Board facilitate the exercise of the GDPR rights for Members of the Group and resolve the breaches by implementing appropriate technical and organisational measures and safeguards that quickly and effectively halt the serious harm which the Tailte Éireann GDPR breaches are causing to so many people. But any failure to quickly



and effectively halt the serious harm which the Tailte Éireann GDPR breaches are causing to Members of the Group will result in you being named a Defendant in the ensuing proceedings that, *inter alia*, will seek to recover damages suffered by Members of the Group from you in a personal capacity.

As it is my firm opinion that your deliberate, intentional or reckless disregard for EU law when processing information relating to Members of the Group constitutes corruption within the meaning of the Criminal Justice (Corruption Offences) Act 2018, **TAKE NOTE** that appropriate Declarations and Orders will be sought preventing a third party such as the State from indemnifying you from your personal liability, or rendering harmless any effort to first recover damages suffered by Members of the Group from you in a personal capacity.

Yours Sincerely,



Colin Larkin

Enforcement Director,
Riar Ceartais Teo.

Mobile: [REDACTED],

Email: [REDACTED]@ceartais.ie

2 Dair Ard,
Boreen Hill,
Enniscorthy,
Co. Wexford,
Y21 YT57.

28th May 2025

Mr. Gerard Quinn,
Member of the Tailte Éireann Board,
Chancery Street,
Dublin 7,
D07 T652.

By email and registered post.

Our Ref: GRA/0225/01.

Dear Mr. Quinn,

I'm drawing your personal attention to the enclosed letter sent to the Tailte Éireann Data Protection Officer, Mr. Damien Gorman, the key points of which are summarised below.

On 14th February 2025, Riar Ceartais Teo ("RCT") informed you and the other members of the Tailte Éireann Board about systemic breaches of the GDPR on the part of Tailte Éireann that is causing members of RCT's Article 80 GDPR Group Representative Action ("Members of the Group") to suffer tens of millions of euro in damages, reputational damage, distress, ill health, generational trauma and significant economic and social disadvantage arising from Tailte Éireann's unnecessary and disproportionate interference with their rights and freedoms.

Yet during the intervening period it is patently obvious to any reasonable person that not only did you and the other members of the Tailte Éireann Board do nothing to effectively halt the systemic GDPR breaches, but by allowing this unlawful processing to continue, you deliberately and intentionally caused victims of unlawful mortgage transfers to continue suffering intolerable damage that is driving some to contemplate suicide

Your failure, and that the other members of the Tailte Éireann Board, to implement appropriate technical and organisational measures and safeguards that quickly and effectively halt the serious harm which the Tailte Éireann breaches are causing to hundreds of thousands of people, means that in my opinion, there can be little doubt that you and the other members of the Tailte Éireann Board can now be held personally liable as accessories to torts committed by Tailte Éireann. For example, torts of fraud, duty of care, breach of duty, conspiracy and vicarious liability.

Without any further delay, I require that you and the Tailte Éireann Board facilitate the exercise of the GDPR rights for Members of the Group and resolve the breaches by implementing appropriate technical and organisational measures and safeguards that quickly and effectively halt the serious harm which the Tailte Éireann GDPR breaches are causing to so many people. But any failure to quickly

and effectively halt the serious harm which the Tailte Éireann GDPR breaches are causing to Members of the Group will result in you being named a Defendant in the ensuing proceedings that, *inter alia*, will seek to recover damages suffered by Members of the Group from you in a personal capacity.

As it is my firm opinion that your deliberate, intentional or reckless disregard for EU law when processing information relating to Members of the Group constitutes corruption within the meaning of the Criminal Justice (Corruption Offences) Act 2018, **TAKE NOTE** that appropriate Declarations and Orders will be sought preventing a third party such as the State from indemnifying you from your personal liability, or rendering harmless any effort to first recover damages suffered by Members of the Group from you in a personal capacity.

Yours Sincerely,

[Redacted signature]

Colin Larkin

Enforcement Director,
Riar Ceartais Teo.

Mobile: [Redacted],

Email: [Redacted]@ceartais.ie

2 Dair Ard,
Boreen Hill,
Enniscorthy,
Co. Wexford,
Y21 YT57.

28th May 2025

Mr. Martin Sisk,
Member of the Tailte Éireann Board,
Chancery Street,
Dublin 7,
D07 T652.

By email and registered post.

Our Ref: GRA/0225/01.

Dear Mr. Sisk,

I'm drawing your personal attention to the enclosed letter sent to the Tailte Éireann Data Protection Officer, Mr. Damien Gorman, the key points of which are summarised below.

On 14th February 2025, Riar Ceartais Teo ("RCT") informed you and the other members of the Tailte Éireann Board about systemic breaches of the GDPR on the part of Tailte Éireann that is causing members of RCT's Article 80 GDPR Group Representative Action ("Members of the Group") to suffer tens of millions of euro in damages, reputational damage, distress, ill health, generational trauma and significant economic and social disadvantage arising from Tailte Éireann's unnecessary and disproportionate interference with their rights and freedoms.

Yet during the intervening period it is patently obvious to any reasonable person that not only did you and the other members of the Tailte Éireann Board do nothing to effectively halt the systemic GDPR breaches, but by allowing this unlawful processing to continue, you deliberately and intentionally caused victims of unlawful mortgage transfers to continue suffering intolerable damage that is driving some to contemplate suicide

Your failure, and that the other members of the Tailte Éireann Board, to implement appropriate technical and organisational measures and safeguards that quickly and effectively halt the serious harm which the Tailte Éireann breaches are causing to hundreds of thousands of people, means that in my opinion, there can be little doubt that you and the other members of the Tailte Éireann Board can now be held personally liable as accessories to torts committed by Tailte Éireann. For example, torts of fraud, duty of care, breach of duty, conspiracy and vicarious liability.

Without any further delay, I require that you and the Tailte Éireann Board facilitate the exercise of the GDPR rights for Members of the Group and resolve the breaches by implementing appropriate technical and organisational measures and safeguards that quickly and effectively halt the serious harm which the Tailte Éireann GDPR breaches are causing to so many people. But any failure to quickly



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As it is my firm opinion that your deliberate, intentional or reckless disregard for EU law when processing information relating to Members of the Group constitutes corruption within the meaning of the Criminal Justice (Corruption Offences) Act 2018, **TAKE NOTE** that appropriate Declarations and Orders will be sought preventing a third party such as the State from indemnifying you from your personal liability, or rendering harmless any effort to first recover damages suffered by Members of the Group from you in a personal capacity.

Yours Sincerely,



Colin Larkin

Enforcement Director,
Riar Ceartais Teo.

Mobile: [REDACTED],

Email: [REDACTED]@ceartais.ie

2 Dair Ard,
Boreen Hill,
Enniscorthy,
Co. Wexford,
Y21 YT57.

28th May 2025

Ms. Mary Keane,
Member of the Tailte Éireann Board,
Chancery Street,
Dublin 7,
D07 T652.

By email and registered post.

Our Ref: GRA/0225/01.

Dear Ms. Keane,

I'm drawing your personal attention to the enclosed letter sent to the Tailte Éireann Data Protection Officer, Mr. Damien Gorman, the key points of which are summarised below.

On 14th February 2025, Riar Ceartais Teo ("RCT") informed you and the other members of the Tailte Éireann Board about systemic breaches of the GDPR on the part of Tailte Éireann that is causing members of RCT's Article 80 GDPR Group Representative Action ("Members of the Group") to suffer tens of millions of euro in damages, reputational damage, distress, ill health, generational trauma and significant economic and social disadvantage arising from Tailte Éireann's unnecessary and disproportionate interference with their rights and freedoms.

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Yours Sincerely,



Colin Larkin

Enforcement Director,
Riar Ceartais Teo.

Mobile: ,

Email: @ceartais.ie

2 Dair Ard,
Boreen Hill,
Enniscorthy,
Co. Wexford,
Y21 YT57.

28th May 2025

Ms. Rowena Mulcahy,
Member of the Tailte Éireann Board,
Chancery Street,
Dublin 7,
D07 T652.

By email and registered post.

Our Ref: GRA/0225/01.

Dear Ms. Mulcahy,

I'm drawing your personal attention to the enclosed letter sent to the Tailte Éireann Data Protection Officer, Mr. Damien Gorman, the key points of which are summarised below.

On 14th February 2025, Riar Ceartais Teo ("RCT") informed you and the other members of the Tailte Éireann Board about systemic breaches of the GDPR on the part of Tailte Éireann that is causing members of RCT's Article 80 GDPR Group Representative Action ("Members of the Group") to suffer tens of millions of euro in damages, reputational damage, distress, ill health, generational trauma and significant economic and social disadvantage arising from Tailte Éireann's unnecessary and disproportionate interference with their rights and freedoms.

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Your failure, and that the other members of the Tailte Éireann Board, to implement appropriate technical and organisational measures and safeguards that quickly and effectively halt the serious harm which the Tailte Éireann breaches are causing to hundreds of thousands of people, means that in my opinion, there can be little doubt that you and the other members of the Tailte Éireann Board can now be held personally liable as accessories to torts committed by Tailte Éireann. For example, torts of fraud, duty of care, breach of duty, conspiracy and vicarious liability.

Without any further delay, I require that you and the Tailte Éireann Board facilitate the exercise of the GDPR rights for Members of the Group and resolve the breaches by implementing appropriate technical and organisational measures and safeguards that quickly and effectively halt the serious harm which the Tailte Éireann GDPR breaches are causing to so many people. But any failure to quickly



and effectively halt the serious harm which the Tailte Éireann GDPR breaches are causing to Members of the Group will result in you being named a Defendant in the ensuing proceedings that, *inter alia*, will seek to recover damages suffered by Members of the Group from you in a personal capacity.

As it is my firm opinion that your deliberate, intentional or reckless disregard for EU law when processing information relating to Members of the Group constitutes corruption within the meaning of the Criminal Justice (Corruption Offences) Act 2018, **TAKE NOTE** that appropriate Declarations and Orders will be sought preventing a third party such as the State from indemnifying you from your personal liability, or rendering harmless any effort to first recover damages suffered by Members of the Group from you in a personal capacity.

Yours Sincerely,

[Redacted signature]

Colin Larkin

Enforcement Director,
Riar Ceartais Teo.

Mobile: [Redacted],

Email: [Redacted]@ceartais.ie

2 Dair Ard,
Boreen Hill,
Enniscorthy,
Co. Wexford,
Y21 YT57.

28th May 2025

Ms. Shirley Coulter,
Member of the Tailte Éireann Board,
Chancery Street,
Dublin 7,
D07 T652.

By email and registered post.

Our Ref: GRA/0225/01.

Dear Ms. Coulter,

I'm drawing your personal attention to the enclosed letter to the Tailte Éireann Data Protection Officer, Mr. Damien Gorman.

On 14th February 2025, Riar Ceartais Teo ("RCT") informed you and the other members of the Tailte Éireann Board about systemic breaches of the GDPR on the part of Tailte Éireann that is causing members of RCT's Article 80 GDPR Group Representative Action ("Members of the Group") to suffer tens of millions of euro in damages, reputational damage, distress, ill health, generational trauma and significant economic and social disadvantage arising from Tailte Éireann's unnecessary and disproportionate interference with their rights and freedoms.

Yet during the intervening period it is patently obvious to any reasonable person that not only did you and the other members of the Tailte Éireann Board do nothing to effectively halt the systemic GDPR breaches, but by allowing this unlawful processing to continue, you deliberately and intentionally caused victims of unlawful mortgage transfers to continue suffering intolerable damage that is driving some to contemplate suicide

Your failure, and that the other members of the Tailte Éireann Board, to implement appropriate technical and organisational measures and safeguards that quickly and effectively halt the serious harm which the Tailte Éireann breaches are causing to hundreds of thousands of people, means that in my opinion, there can be little doubt that you and the other members of the Tailte Éireann Board can now be held personally liable as accessories to torts committed by Tailte Éireann. For example, torts of fraud, duty of care, breach of duty, conspiracy and vicarious liability.

Without any further delay, I require that you and the Tailte Éireann Board facilitate the lawful exercise of the GDPR rights for Members of the Group and resolve the breaches by implementing appropriate technical and organisational measures and safeguards that quickly and effectively halt the serious harm which the Tailte Éireann GDPR breaches are causing to so many people. But any failure to quickly



and effectively halt the serious harm which the Tailte Éireann GDPR breaches are causing to Members of the Group will result in you being named as a Defendant in the ensuing proceedings seeking to recover the damages suffered by Members of the Group from you in your personal capacity.

Yours Sincerely,



Colin Larkin

Enforcement Director,
Riar Ceartais Teo.

Mobile: [REDACTED],

Email: [REDACTED]@ceartais.ie

2 Dair Ard,
Boreen Hill,
Enniscorthy,
Co. Wexford,
Y21 YT57.

20th February 2025

Mr. David McGarry,
Chairperson of the Tailte Éireann Board,
Chancery Street,
Dublin 7,
D07 T652.

By email and registered post.

Tailte Éireann GDPR Group Representation Rights Exercise
Our Ref: GRA/0225/01.

Dear Mr. McGarry,

I'm drawing your personal attention to the enclosed correspondence sent to the Tailte Éireann Data Protection Officer at dataprotection@tailte.ie on 14th February 2025 on behalf of Members of the Group Representation Action identified as GRA/0225/01.

Having now brought that correspondence to your personal attention, **TAKE NOTE** that any failure by Tailte Éireann to completely facilitate the data protection rights exercised on behalf of Members of the Group will be treated as a deliberate and intentional personal fiduciary breach on your part as the Tailte Éireann Board Chairperson to ensure Tailte Éireann's compliance with its duties, obligations and responsibilities under the GDPR.

Driving the urgency behind this letter, despite exercising the Article 18 and 21 GDPR rights of restriction and objection with Tailte Éireann on behalf of Mr. Seamus Morris and Mrs. Bernadette Morris, both of whom are Members of the Group (respectively GRA/0225/01 member IDs 1020 and 1021), Mr. Stephen Tennant, a receiver unlawfully appointed by Mars Capital Finance Ireland DAC ("Mars"), has now engaged Gibson Auctions Ltd. to sell their property¹ online at 12 noon next Thursday, 27th February 2025. Regarding Tailte Éireann's liability, and consequently your personal liability, based solely on the charge which Tailte Éireann unlawfully amended in favour of Mars on 25th July 2024, Mars is now selling the Morriss' property without a court order.

TAKE NOTE, if Tailte Éireann does not take **immediate** steps to halt this unlawful auction, Riar Ceartais Teoranta ("RCT") will seek to personally recover the Morriss' €300k (est.) expected property loss from you and from the other Members of the Tailte Éireann Board as an accessory to the tort. RCT will also seek to recover at least €400k in further reputational damages that Mr. and Mrs. Morris are today suffering from the unlawful advertising of their property for sale online. That is in addition to at least

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€400k reputational damages which the Morriss' suffered when solicitors acting for Start Mortgages DAC ("Start") pursued them through unlawful High Court proceedings made possible when Tailte Éireann unlawfully amended the charge recorded against their property in favour of Start on 15th March 2019.

Regarding some immediate steps available to Tailte Éireann, Tailte Éireann can seek to secure orders against Mars, Mr. Tennant and Gibson Auctions Ltd. imposing corrective measures specified *inter alia* at Article 58(2)(c), 58(2)(d), 58(2)(f) and 58(2)(g) GDPR. Regarding the criminal processing of personal data relating to Mr. and Mrs. Morris by Mars, Mr. Tennant and Gibson Auctions Ltd., you have a legal duty under section 19 of the Criminal Justice Act 2011 (as amended) to report to An Garda Síochána at least offences relating to the *disclosure of personal data obtained without authority*, and *offences by directors, etc., of bodies corporate* within the meaning of sections 145(1) and 146 of the Data Protection Act 2018 (as amended).

By way of another example that is separate to Mr. and Mrs. Morris, solicitors acting for Mars are continuing to process information relating to property owned by Mr. David Murphy and Mrs. Noreen Murphy in preparation for further unlawful processing before the High Court next Monday. Both Mr. and Mrs. Murphy are Members of the Group (respectively GRA/0225/01 member IDs 1012 and 1013) in circumstances where none of this unlawful Mars processing could occur but for the unlawful Tailte Éireann processing to amend the charge recorded against their property in favour of Mars.

Noting the above, any further failure by Tailte Éireann to faithfully comply with its duties, obligations and responsibilities under the GDPR when processing information relating to Members of the Group will also be treated as a deliberate and intentional personal fiduciary breach on your part as the Tailte Éireann Board Chairperson to ensure Tailte Éireann implement appropriate technical and organisational measures that *inter alia*,

1. effectively protect Members of the Group from any risk of harm,
2. implement the Article 5 GDPR principles in an effective manner,
3. integrate the necessary safeguards into its processing in order to meet the requirements of the GDPR, and which
4. demonstrate that the processing of information relating to Members of the Group is performed in accordance with the GDPR.

Regarding Tailte Éireann's Article 19 GDPR notification duties, **TAKE NOTE** that any further processing by a third party such as Mars, Mr. Tennant or Gibson Auctions Ltd. in reliance of charges unlawfully amended by Tailte Éireann will be treated as an Article 12(2) GDPR breach by Tailte Éireann to facilitate the Article 18 and 21 GDPR rights of restriction and objection exercised on behalf of Members of the Group.

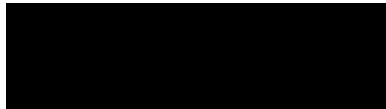
Mr. McGarry, the scale of the pain, suffering, distress, ill health, reputational damage and financial loss arising from the organised criminal processing of personal data relating to hundreds of thousands of victims of unlawful mortgage transfers is such that Tailte Éireann must take immediate steps to halt what is happening; it cannot be allowed to continue. I again remind you of Tailte Éireann's



constitutional duty to protect people from unjust attack, and in the case of an injustice done, to vindicate the life, good name and property rights of every citizen.

But if you fail to take immediate steps that concretely address the wrong, then please know that RCT will exhibit this correspondence when seeking to hold you personally liable as an accessory to the tort when seeking to recover from you any damages suffered by Members of the Group.

Yours Sincerely,



Colin Larkin

Enforcement Director,
Riar Ceartais Teo.

Mobile: [REDACTED],

Email: [REDACTED]@ceartais.ie

2 Dair Ard,
Boreen Hill,
Enniscorthy,
Co. Wexford,
Y21 YT57.

20th February 2025

Mr. Gerard Quinn,
Member of the Tailte Éireann Board,
Chancery Street,
Dublin 7,
D07 T652.

By email and registered post.

Tailte Éireann GDPR Group Representation Rights Exercise
Our Ref: GRA/0225/01.

Dear Mr. Quinn,

I'm drawing your personal attention to the enclosed correspondence sent to the Tailte Éireann Data Protection Officer at dataprotection@tailte.ie on 14th February 2025 on behalf of Members of the Group Representation Action identified as GRA/0225/01.

Having now brought that correspondence to your personal attention, **TAKE NOTE** that any failure by Tailte Éireann to completely facilitate the data protection rights exercised on behalf of Members of the Group will be treated as a deliberate and intentional personal fiduciary breach on your part as a Member of the Tailte Éireann Board to ensure Tailte Éireann's compliance with its duties, obligations and responsibilities under the GDPR.

Driving the urgency behind this letter, despite exercising the Article 18 and 21 GDPR rights of restriction and objection with Tailte Éireann on behalf of Mr. Seamus Morris and Mrs. Bernadette Morris, both of whom are Members of the Group (respectively GRA/0225/01 member IDs 1020 and 1021), Mr. Stephen Tennant, a receiver unlawfully appointed by Mars Capital Finance Ireland DAC ("Mars"), has now engaged Gibson Auctions Ltd. to sell their property¹ online at 12 noon next Thursday, 27th February 2025. Regarding Tailte Éireann's liability, and consequently your personal liability, based solely on the charge which Tailte Éireann unlawfully amended in favour of Mars on 25th July 2024, Mars is now selling the Morriss' property without a court order.

TAKE NOTE, if Tailte Éireann does not take **immediate** steps to halt this unlawful auction, Riar Ceartais Teoranta ("RCT") will seek to personally recover the Morriss' €300k (est.) expected property loss from you and from the other Members of the Tailte Éireann Board as an accessory to the tort. RCT will also seek to recover at least €400k in further reputational damages that Mr. and Mrs. Morris are today suffering from the unlawful advertising of their property for sale online. That is in addition to at least

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€400k reputational damages which the Morriss' suffered when solicitors acting for Start Mortgages DAC ("Start") pursued them through unlawful High Court proceedings made possible when Tailte Éireann unlawfully amended the charge recorded against their property in favour of Start on 15th March 2019.

Regarding some immediate steps available to Tailte Éireann, Tailte Éireann can seek to secure orders against Mars, Mr. Tennant and Gibson Auctions Ltd. imposing corrective measures specified *inter alia* at Article 58(2)(c), 58(2)(d), 58(2)(f) and 58(2)(g) GDPR. Regarding the criminal processing of personal data relating to Mr. and Mrs. Morris by Mars, Mr. Tennant and Gibson Auctions Ltd., you have a legal duty under section 19 of the Criminal Justice Act 2011 (as amended) to report to An Garda Síochána at least offences relating to the *disclosure of personal data obtained without authority*, and *offences by directors, etc., of bodies corporate* within the meaning of sections 145(1) and 146 of the Data Protection Act 2018 (as amended).

By way of another example that is separate to Mr. and Mrs. Morris, solicitors acting for Mars are continuing to process information relating to property owned by Mr. David Murphy and Mrs. Noreen Murphy in preparation for further unlawful processing before the High Court next Monday. Both Mr. and Mrs. Murphy are Members of the Group (respectively GRA/0225/01 member IDs 1012 and 1013) in circumstances where none of this unlawful Mars processing could occur but for the unlawful Tailte Éireann processing to amend the charge recorded against their property in favour of Mars.

Noting the above, any further failure by Tailte Éireann to faithfully comply with its duties, obligations and responsibilities under the GDPR when processing information relating to Members of the Group will also be treated as a deliberate and intentional personal fiduciary breach on your part as a Member of the Tailte Éireann Board to ensure Tailte Éireann implement appropriate technical and organisational measures that *inter alia*,

1. effectively protect Members of the Group from any risk of harm,
2. implement the Article 5 GDPR principles in an effective manner,
3. integrate the necessary safeguards into its processing in order to meet the requirements of the GDPR, and which
4. demonstrate that the processing of information relating to Members of the Group is performed in accordance with the GDPR.

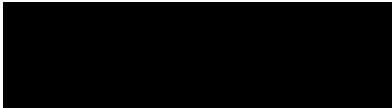
Regarding Tailte Éireann's Article 19 GDPR notification duties, **TAKE NOTE** that any further processing by a third party such as Mars, Mr. Tennant or Gibson Auctions Ltd. in reliance of charges unlawfully amended by Tailte Éireann will be treated as an Article 12(2) GDPR breach by Tailte Éireann to facilitate the Article 18 and 21 GDPR rights of restriction and objection exercised on behalf of Members of the Group.

Mr. Quinn, the scale of the pain, suffering, distress, ill health, reputational damage and financial loss arising from the organised criminal processing of personal data relating to hundreds of thousands of victims of unlawful mortgage transfers is such that Tailte Éireann must take immediate steps to halt what is happening; it cannot be allowed to continue. I again remind you of Tailte Éireann's

constitutional duty to protect people from unjust attack, and in the case of an injustice done, to vindicate the life, good name and property rights of every citizen.

But if you fail to take immediate steps that concretely address the wrong, then please know that RCT will exhibit this correspondence when seeking to hold you personally liable as an accessory to the tort when seeking to recover from you any damages suffered by Members of the Group.

Yours Sincerely,



Colin Larkin

Enforcement Director,
Riar Ceartais Teo.

Mobile: [REDACTED],

Email: [REDACTED]@[ceartais.ie](mailto:contactus@ceartais.ie)

2 Dair Ard,
Boreen Hill,
Enniscorthy,
Co. Wexford,
Y21 YT57.

20th February 2025

Mr. Martin Sisk,
Member of the Tailte Éireann Board,
Chancery Street,
Dublin 7,
D07 T652.

By email and registered post.

Tailte Éireann GDPR Group Representation Rights Exercise
Our Ref: GRA/0225/01.

Dear Mr. Sisk,

I'm drawing your personal attention to the enclosed correspondence sent to the Tailte Éireann Data Protection Officer at dataprotection@tailte.ie on 14th February 2025 on behalf of Members of the Group Representation Action identified as GRA/0225/01.

Having now brought that correspondence to your personal attention, **TAKE NOTE** that any failure by Tailte Éireann to completely facilitate the data protection rights exercised on behalf of Members of the Group will be treated as a deliberate and intentional personal fiduciary breach on your part as a Member of the Tailte Éireann Board to ensure Tailte Éireann's compliance with its duties, obligations and responsibilities under the GDPR.

Driving the urgency behind this letter, despite exercising the Article 18 and 21 GDPR rights of restriction and objection with Tailte Éireann on behalf of Mr. Seamus Morris and Mrs. Bernadette Morris, both of whom are Members of the Group (respectively GRA/0225/01 member IDs 1020 and 1021), Mr. Stephen Tennant, a receiver unlawfully appointed by Mars Capital Finance Ireland DAC ("Mars"), has now engaged Gibson Auctions Ltd. to sell their property¹ online at 12 noon next Thursday, 27th February 2025. Regarding Tailte Éireann's liability, and consequently your personal liability, based solely on the charge which Tailte Éireann unlawfully amended in favour of Mars on 25th July 2024, Mars is now selling the Morriss' property without a court order.

TAKE NOTE, if Tailte Éireann does not take **immediate** steps to halt this unlawful auction, Riar Ceartais Teoranta ("RCT") will seek to personally recover the Morriss' €300k (est.) expected property loss from you and from the other Members of the Tailte Éireann Board as an accessory to the tort. RCT will also seek to recover at least €400k in further reputational damages that Mr. and Mrs. Morris are today suffering from the unlawful advertising of their property for sale online. That is in addition to at least

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Regarding some immediate steps available to Tailte Éireann, Tailte Éireann can seek to secure orders against Mars, Mr. Tennant and Gibson Auctions Ltd. imposing corrective measures specified *inter alia* at Article 58(2)(c), 58(2)(d), 58(2)(f) and 58(2)(g) GDPR. Regarding the criminal processing of personal data relating to Mr. and Mrs. Morris by Mars, Mr. Tennant and Gibson Auctions Ltd., you have a legal duty under section 19 of the Criminal Justice Act 2011 (as amended) to report to An Garda Síochána at least offences relating to the *disclosure of personal data obtained without authority*, and *offences by directors, etc., of bodies corporate* within the meaning of sections 145(1) and 146 of the Data Protection Act 2018 (as amended).

By way of another example that is separate to Mr. and Mrs. Morris, solicitors acting for Mars are continuing to process information relating to property owned by Mr. David Murphy and Mrs. Noreen Murphy in preparation for further unlawful processing before the High Court next Monday. Both Mr. and Mrs. Murphy are Members of the Group (respectively GRA/0225/01 member IDs 1012 and 1013) in circumstances where none of this unlawful Mars processing could occur but for the unlawful Tailte Éireann processing to amend the charge recorded against their property in favour of Mars.

Noting the above, any further failure by Tailte Éireann to faithfully comply with its duties, obligations and responsibilities under the GDPR when processing information relating to Members of the Group will also be treated as a deliberate and intentional personal fiduciary breach on your part as a Member of the Tailte Éireann Board to ensure Tailte Éireann implement appropriate technical and organisational measures that *inter alia*,

1. effectively protect Members of the Group from any risk of harm,
2. implement the Article 5 GDPR principles in an effective manner,
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4. demonstrate that the processing of information relating to Members of the Group is performed in accordance with the GDPR.

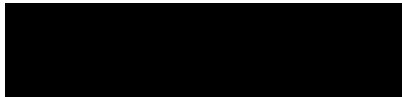
Regarding Tailte Éireann's Article 19 GDPR notification duties, **TAKE NOTE** that any further processing by a third party such as Mars, Mr. Tennant or Gibson Auctions Ltd. in reliance of charges unlawfully amended by Tailte Éireann will be treated as an Article 12(2) GDPR breach by Tailte Éireann to facilitate the Article 18 and 21 GDPR rights of restriction and objection exercised on behalf of Members of the Group.

Mr. Sisk, the scale of the pain, suffering, distress, ill health, reputational damage and financial loss arising from the organised criminal processing of personal data relating to hundreds of thousands of victims of unlawful mortgage transfers is such that Tailte Éireann must take immediate steps to halt what is happening; it cannot be allowed to continue. I again remind you of Tailte Éireann's

constitutional duty to protect people from unjust attack, and in the case of an injustice done, to vindicate the life, good name and property rights of every citizen.

But if you fail to take immediate steps that concretely address the wrong, then please know that RCT will exhibit this correspondence when seeking to hold you personally liable as an accessory to the tort when seeking to recover from you any damages suffered by Members of the Group.

Yours Sincerely,



Colin Larkin

Enforcement Director,
Riar Ceartais Teo.

Mobile: [REDACTED],

Email: [REDACTED]@ceartais.ie

2 Dair Ard,
Boreen Hill,
Enniscorthy,
Co. Wexford,
Y21 YT57.

20th February 2025

Ms. Mary Keane,
Member of the Tailte Éireann Board,
Chancery Street,
Dublin 7,
D07 T652.

By email and registered post.

Tailte Éireann GDPR Group Representation Rights Exercise
Our Ref: GRA/0225/01.

Dear Ms. Keane,

I'm drawing your personal attention to the enclosed correspondence sent to the Tailte Éireann Data Protection Officer at dataprotection@tailte.ie on 14th February 2025 on behalf of Members of the Group Representation Action identified as GRA/0225/01.

Having now brought that correspondence to your personal attention, **TAKE NOTE** that any failure by Tailte Éireann to completely facilitate the data protection rights exercised on behalf of Members of the Group will be treated as a deliberate and intentional personal fiduciary breach on your part as a Member of the Tailte Éireann Board to ensure Tailte Éireann's compliance with its duties, obligations and responsibilities under the GDPR.

Driving the urgency behind this letter, despite exercising the Article 18 and 21 GDPR rights of restriction and objection with Tailte Éireann on behalf of Mr. Seamus Morris and Mrs. Bernadette Morris, both of whom are Members of the Group (respectively GRA/0225/01 member IDs 1020 and 1021), Mr. Stephen Tennant, a receiver unlawfully appointed by Mars Capital Finance Ireland DAC ("Mars"), has now engaged Gibson Auctions Ltd. to sell their property¹ online at 12 noon next Thursday, 27th February 2025. Regarding Tailte Éireann's liability, and consequently your personal liability, based solely on the charge which Tailte Éireann unlawfully amended in favour of Mars on 25th July 2024, Mars is now selling the Morriss' property without a court order.

TAKE NOTE, if Tailte Éireann does not take **immediate** steps to halt this unlawful auction, Riar Ceartais Teoranta ("RCT") will seek to personally recover the Morriss' €300k (est.) expected property loss from you and from the other Members of the Tailte Éireann Board as an accessory to the tort. RCT will also seek to recover at least €400k in further reputational damages that Mr. and Mrs. Morris are today suffering from the unlawful advertising of their property for sale online. That is in addition to at least

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€400k reputational damages which the Morriss' suffered when solicitors acting for Start Mortgages DAC ("Start") pursued them through unlawful High Court proceedings made possible when Tailte Éireann unlawfully amended the charge recorded against their property in favour of Start on 15th March 2019.

Regarding some immediate steps available to Tailte Éireann, Tailte Éireann can seek to secure orders against Mars, Mr. Tennant and Gibson Auctions Ltd. imposing corrective measures specified *inter alia* at Article 58(2)(c), 58(2)(d), 58(2)(f) and 58(2)(g) GDPR. Regarding the criminal processing of personal data relating to Mr. and Mrs. Morris by Mars, Mr. Tennant and Gibson Auctions Ltd., you have a legal duty under section 19 of the Criminal Justice Act 2011 (as amended) to report to An Garda Síochána at least offences relating to the *disclosure of personal data obtained without authority*, and *offences by directors, etc., of bodies corporate* within the meaning of sections 145(1) and 146 of the Data Protection Act 2018 (as amended).

By way of another example that is separate to Mr. and Mrs. Morris, solicitors acting for Mars are continuing to process information relating to property owned by Mr. David Murphy and Mrs. Noreen Murphy in preparation for further unlawful processing before the High Court next Monday. Both Mr. and Mrs. Murphy are Members of the Group (respectively GRA/0225/01 member IDs 1012 and 1013) in circumstances where none of this unlawful Mars processing could occur but for the unlawful Tailte Éireann processing to amend the charge recorded against their property in favour of Mars.

Noting the above, any further failure by Tailte Éireann to faithfully comply with its duties, obligations and responsibilities under the GDPR when processing information relating to Members of the Group will also be treated as a deliberate and intentional personal fiduciary breach on your part as a Member of the Tailte Éireann Board to ensure Tailte Éireann implement appropriate technical and organisational measures that *inter alia*,

1. effectively protect Members of the Group from any risk of harm,
2. implement the Article 5 GDPR principles in an effective manner,
3. integrate the necessary safeguards into its processing in order to meet the requirements of the GDPR, and which
4. demonstrate that the processing of information relating to Members of the Group is performed in accordance with the GDPR.

Regarding Tailte Éireann's Article 19 GDPR notification duties, **TAKE NOTE** that any further processing by a third party such as Mars, Mr. Tennant or Gibson Auctions Ltd. in reliance of charges unlawfully amended by Tailte Éireann will be treated as an Article 12(2) GDPR breach by Tailte Éireann to facilitate the Article 18 and 21 GDPR rights of restriction and objection exercised on behalf of Members of the Group.

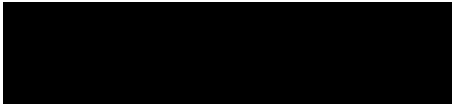
Ms. Keane, the scale of the pain, suffering, distress, ill health, reputational damage and financial loss arising from the organised criminal processing of personal data relating to hundreds of thousands of victims of unlawful mortgage transfers is such that Tailte Éireann must take immediate steps to halt what is happening; it cannot be allowed to continue. I again remind you of Tailte Éireann's



constitutional duty to protect people from unjust attack, and in the case of an injustice done, to vindicate the life, good name and property rights of every citizen.

But if you fail to take immediate steps that concretely address the wrong, then please know that RCT will exhibit this correspondence when seeking to hold you personally liable as an accessory to the tort when seeking to recover from you any damages suffered by Members of the Group.

Yours Sincerely,



Colin Larkin

Enforcement Director,
Riar Ceartais Teo.

Mobile: [REDACTED],

Email: [REDACTED]@ceartais.ie

2 Dair Ard,
Boreen Hill,
Enniscorthy,
Co. Wexford,
Y21 YT57.

3rd June 2025

Ms. Rowena Mulcahy,
Member of the Tailte Éireann Board,
Chancery Street,
Dublin 7,
D07 T652.

By email and registered post.

Our Ref: GRA/0225/01.

Dear Ms. Mulcahy,

I'm drawing your personal attention to the enclosed letter to the Tailte Éireann Data Protection Officer, Mr. Damien Gorman.

On 14th February 2025, Riar Ceartais Teo ("RCT") informed you and the other members of the Tailte Éireann Board about systemic breaches of the GDPR on the part of Tailte Éireann that is causing members of RCT's Article 80 GDPR Group Representative Action ("Members of the Group") to suffer tens of millions of euro in damages, reputational damage, distress, ill health, generational trauma and significant economic and social disadvantage arising from Tailte Éireann's unnecessary and disproportionate interference with their rights and freedoms.

Yet during the intervening period it is patently obvious to any reasonable person that not only did you and the other members of the Tailte Éireann Board do nothing to effectively halt the systemic GDPR breaches, but by allowing this unlawful processing to continue, you deliberately and intentionally caused victims of unlawful mortgage transfers to continue suffering intolerable damage that is driving some to contemplate suicide

Your failure, and that the other members of the Tailte Éireann Board, to implement appropriate technical and organisational measures and safeguards that quickly and effectively halt the serious harm which the Tailte Éireann breaches are causing to hundreds of thousands of people, means that in my opinion, there can be little doubt that you and the other members of the Tailte Éireann Board can now be held personally liable as accessories to torts committed by Tailte Éireann. For example, torts of fraud, duty of care, breach of duty, conspiracy and vicarious liability.

Without any further delay, I require that you and the Tailte Éireann Board facilitate the lawful exercise of the GDPR rights for Members of the Group and resolve the breaches by implementing appropriate technical and organisational measures and safeguards that quickly and effectively halt the serious harm which the Tailte Éireann GDPR breaches are causing to so many people. But any failure to quickly



and effectively halt the serious harm which the Tailte Éireann GDPR breaches are causing to Members of the Group will result in you being named as a Defendant in the ensuing proceedings seeking to recover the damages suffered by Members of the Group from you in your personal capacity.

Yours Sincerely,



Colin Larkin

Enforcement Director,
Riar Ceartais Teo.

Mobile: [REDACTED],

Email: [REDACTED]@ceartais.ie

2 Dair Ard,
Boreen Hill,
Enniscorthy,
Co. Wexford,
Y21 YT57.

20th February 2025

Ms. Shirley Coulter,
Member of the Tailte Éireann Board,
Chancery Street,
Dublin 7,
D07 T652.

By email and registered post.

Tailte Éireann GDPR Group Representation Rights Exercise
Our Ref: GRA/0225/01.

Dear Ms. Coulter,

I'm drawing your personal attention to the enclosed correspondence sent to the Tailte Éireann Data Protection Officer at dataprotection@tailte.ie on 14th February 2025 on behalf of Members of the Group Representation Action identified as GRA/0225/01.

Having now brought that correspondence to your personal attention, **TAKE NOTE** that any failure by Tailte Éireann to completely facilitate the data protection rights exercised on behalf of Members of the Group will be treated as a deliberate and intentional personal fiduciary breach on your part as a Member of the Tailte Éireann Board to ensure Tailte Éireann's compliance with its duties, obligations and responsibilities under the GDPR.

Driving the urgency behind this letter, despite exercising the Article 18 and 21 GDPR rights of restriction and objection with Tailte Éireann on behalf of Mr. Seamus Morris and Mrs. Bernadette Morris, both of whom are Members of the Group (respectively GRA/0225/01 member IDs 1020 and 1021), Mr. Stephen Tennant, a receiver unlawfully appointed by Mars Capital Finance Ireland DAC ("Mars"), has now engaged Gibson Auctions Ltd. to sell their property¹ online at 12 noon next Thursday, 27th February 2025. Regarding Tailte Éireann's liability, and consequently your personal liability, based solely on the charge which Tailte Éireann unlawfully amended in favour of Mars on 25th July 2024, Mars is now selling the Morriss' property without a court order.

TAKE NOTE, if Tailte Éireann does not take **immediate** steps to halt this unlawful auction, Riar Ceartais Teoranta ("RCT") will seek to personally recover the Morriss' €300k (est.) expected property loss from you and from the other Members of the Tailte Éireann Board as an accessory to the tort. RCT will also seek to recover at least €400k in further reputational damages that Mr. and Mrs. Morris are today suffering from the unlawful advertising of their property for sale online. That is in addition to at least

¹ <https://brggibsondublinauctions.eigonlineauctions.com/lot/details/139957>



€400k reputational damages which the Morriss' suffered when solicitors acting for Start Mortgages DAC ("Start") pursued them through unlawful High Court proceedings made possible when Tailte Éireann unlawfully amended the charge recorded against their property in favour of Start on 15th March 2019.

Regarding some immediate steps available to Tailte Éireann, Tailte Éireann can seek to secure orders against Mars, Mr. Tennant and Gibson Auctions Ltd. imposing corrective measures specified *inter alia* at Article 58(2)(c), 58(2)(d), 58(2)(f) and 58(2)(g) GDPR. Regarding the criminal processing of personal data relating to Mr. and Mrs. Morris by Mars, Mr. Tennant and Gibson Auctions Ltd., you have a legal duty under section 19 of the Criminal Justice Act 2011 (as amended) to report to An Garda Síochána at least offences relating to the *disclosure of personal data obtained without authority*, and *offences by directors, etc., of bodies corporate* within the meaning of sections 145(1) and 146 of the Data Protection Act 2018 (as amended).

By way of another example that is separate to Mr. and Mrs. Morris, solicitors acting for Mars are continuing to process information relating to property owned by Mr. David Murphy and Mrs. Noreen Murphy in preparation for further unlawful processing before the High Court next Monday. Both Mr. and Mrs. Murphy are Members of the Group (respectively GRA/0225/01 member IDs 1012 and 1013) in circumstances where none of this unlawful Mars processing could occur but for the unlawful Tailte Éireann processing to amend the charge recorded against their property in favour of Mars.

Noting the above, any further failure by Tailte Éireann to faithfully comply with its duties, obligations and responsibilities under the GDPR when processing information relating to Members of the Group will also be treated as a deliberate and intentional personal fiduciary breach on your part as a Member of the Tailte Éireann Board to ensure Tailte Éireann implement appropriate technical and organisational measures that *inter alia*,

1. effectively protect Members of the Group from any risk of harm,
2. implement the Article 5 GDPR principles in an effective manner,
3. integrate the necessary safeguards into its processing in order to meet the requirements of the GDPR, and which
4. demonstrate that the processing of information relating to Members of the Group is performed in accordance with the GDPR.

Regarding Tailte Éireann's Article 19 GDPR notification duties, **TAKE NOTE** that any further processing by a third party such as Mars, Mr. Tennant or Gibson Auctions Ltd. in reliance of charges unlawfully amended by Tailte Éireann will be treated as an Article 12(2) GDPR breach by Tailte Éireann to facilitate the Article 18 and 21 GDPR rights of restriction and objection exercised on behalf of Members of the Group.

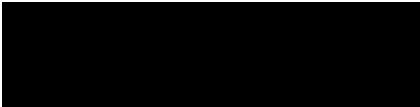
Ms. Coulter, the scale of the pain, suffering, distress, ill health, reputational damage and financial loss arising from the organised criminal processing of personal data relating to hundreds of thousands of victims of unlawful mortgage transfers is such that Tailte Éireann must take immediate steps to halt what is happening; it cannot be allowed to continue. I again remind you of Tailte Éireann's



constitutional duty to protect people from unjust attack, and in the case of an injustice done, to vindicate the life, good name and property rights of every citizen.

But if you fail to take immediate steps that concretely address the wrong, then please know that RCT will exhibit this correspondence when seeking to hold you personally liable as an accessory to the tort when seeking to recover from you any damages suffered by Members of the Group.

Yours Sincerely,



Colin Larkin

Enforcement Director,
Riar Ceartais Teo.

Mobile: [REDACTED],

Email: [REDACTED]@ceartais.ie