

To: RDJ LLP, 85 South Mall, Cork, T12 TP8D, Ireland.  
By email: [info@rdj.ie](mailto:info@rdj.ie) & [taina.romao@rdj.ie](mailto:taina.romao@rdj.ie) (3 pages)



**Re: PTI Hearing ‘Aidan McGuinness Applicant vs Adrian Greaney Respondent’**

Dear Sir / Madam / Unknown Author(s) at RDJ Law.

We respond as a courtesy to your unsolicited email-letter dated May 14<sup>th</sup> last, and respond herewith “*by close of business May 21<sup>st</sup>*” as requested.

Before we do so however, Council believes it important to note that your letter stated; (i) “*By Post and Email*”, and (ii) that it was being, “*sent by email and accordingly bears no signature*” the clear implication being that a signed hardcopy was also en route by post.

Unfortunately, no such signed hardcopy arrived, whereupon we alerted RDJ Law by email three times in succession (May 18<sup>th</sup> – 20<sup>th</sup>) that PTI Council was first of all waiting for; (a) an acknowledgement email (from either of the addresses contacted); (b) the arrival of the (alleged) posted hardcopy and/or; (c) a scanned copy of the author’s signature on the original in order to fulfil normal professional protocols, before responding.

For reasons that are beyond us other than assuming some form of ‘professional contempt’ towards the PTI – which we are hesitant to consider given there might yet be some alternate plausible excuse – nevertheless, Council feels it very pertinent to these particular circumstances to note that no responses at all have been forthcoming from RDJ Law to date, and that no such original hardcopy letter was ever received by the PTI. Council further regrets to note this is hardly the type of “transparency and accountability” required of a Registered B Corp Company, and does little to inspire confidence in RDJ Law’s willingness to ‘conduct business’ in a reasonable, respectful and forthright manner? Perhaps now, it is becoming clear how and why the Tribunal structure is set up in such a manner as to avoid and bypass much of the Machiavellian tactics and often-contemptuous, imperious posturing that passes as ‘legal services’ in this State.

Notwithstanding the above, Council had undertaken to respond, “*by close of business May 21<sup>st</sup>*” and so, in order to maintain the requisite ethical and professional standards of a body that claims, “*Independence, Impartiality & Integrity*” PTI Council are now doing so despite the said apparent communications snub, and the suspiciously-unexplained absence of a qualifying signature to your unsolicited email correspondence.

Your email-letter was referred to PTI Council who unanimously confirmed that in addition to the missing signature issue and therefore no identifiable author; that given we have no authorised documentation on record from the Respondent Mr Adrian Greaney that identifies any named individual at your Law Firm as his nominated proxy, that we regret we cannot communicate with RDJ Law in respect of Mr McGuinness’s *inter parties* PTI Application, for to do so would violate PTI Process Rules and possibly also GDPR .

Your respective demands and advices therefore – as well as your unsigned letter itself – automatically “ceases to be of relevance” to the PTI in accordance with equivalent Rules and criteria as outlined in *Section 8 of the Houses of the Oireachtas (Inquiries, Privileges and Procedures) Act 2013*.

As a professional courtesy however, Council respectfully advises-and-informs that your (PTI-unverified) claim that the Respondent is a client of yours in an associated matter has no bearing to the PTI carrying out its own independent, lawful, *inter parties* review for the simple purpose of providing ‘legal certainty and clarity’ to the Applicant – and thus to all interested parties – other than to reinforce the urgent necessity of the same.

Because as is referred-to explicitly in your letter; in circumstances where that said, “*long running matter*” actually means ‘ongoing over 11 years now’ and where some 21 solicitor firms in succession have failed or refused to facilitate the Applicant in his extended search for ‘an evidence-based report’ without which apparently – as advised-and-implied to him by your very own Law Firm – the Applicant cannot advance his case in the Domestic Courts!?

To be clear; if deployed or applied elsewhere, any such *inter parties* Finding issued out of the PTI will serve only to compliment any ongoing legal process and thereby assist in the expedient delivery of justice, given that the said Finding or Determination is designed to correspond precisely with positive (written) law. And this, as based solely and explicitly upon the sworn claims, facts and evidence as provided to the PTI under the Rules.

Accordingly, and other than assuming that some alternative and/or undisclosed agenda may be in play, Council cannot understand – particularly in the circumstances as laid out above – why any conscientious or truth-seeking person would object to the production of a lawful clarifying document that might aid all parties concerned in the timely resolution of a matter that has been ongoing, without satisfactory resolution, for the Applicant for 22 years, for the Respondent for some 16 years, and for your Law Firm for over 11 years now? Perhaps the legal maxim, “Justice delayed is justice denied” is an apt one here?

The PTI Hearing – and the lawfully-valid processes that give rise to it – cannot therefore be accurately, nor correctly referred to as, “*an attempt to interfere in the judicial process*” as your unsigned letter very-erroneously asserts. Quite the contrary in fact, as should be obvious we believe, to any right-thinking person or to any objectively-observant legal professional – such as the person responsible perhaps, for sending such an ill-advised letter on RDJ company letterhead? For future reference, this person’s identity should we believe, absolutely be ‘on the record’. Indeed, this unsolicited correspondence to the PTI whilst the author was undoubtedly aware of PTI Rules could itself be deemed, ‘an illicit attempt to interfere with or obstruct a lawful procedure’ could it not?

However, for the avoidance of any possible doubt and in the understanding that RDJ Law was alerted to the upcoming PTI Hearing by the Respondent Mr Greaney in the mistaken notion that some *unauthorised* third party could speak for him in this PTI matter; and in the added assumption that the Respondent shared the lawfully-produced foundation documents forwarded to him including *PTI Determination GS/001* which explains in detail the jurisdiction and lawful operation of the PTI under the various Constitutional clauses, the required ‘due processes’ and the since-published foundation documents listed therein (which we attach again for your perusal); then it is left only to Council, again as a professional courtesy, to urge you to carefully-and-properly examine and understand the same, and to reiterate, respectfully, that we cannot and will not correspond with third parties such as yourself without due and proper authorisation from the Respondent.

To clarify: Under PTI Rules, this will require the Respondent to name and nominate an *individual proxy* (if he does not intend representing himself at the hearing) complete with

signed authorisation and a copy of the nominated proxy's I.D., noting that the said proxy's sole function at the hearing is to read the Respondent's sworn Statement on his behalf, plus answering any questions previously put to the Parties, by independent Adjudicators.

It is suggested therefore that the Respondent duly complies with his personal obligations to qualify any named proxy before any more such third-party attempts to correspond with the PTI in this matter. Because otherwise, respectfully, we cannot and will not respond.

Notwithstanding the stated irrelevance of the contents and the technical illegitimacy of your letter both as a professional correspondence and as 'a document before the PTI' in this matter, please be advised that in context of the PTI's foundation documents and inherent Constitutional jurisdiction, plus the legal precedent set in the, '*Manning vs MacGrath*' PTI Article 40.1 Hearing of July 1<sup>st</sup> 2021 where a sitting High Court judge was found unanimously to be in violation of Article 40.1; any attempts by outside agents or agencies to improperly interfere with this lawfully-scheduled public hearing will be interpreted as an illicit and unlawful act, noting that a matter which in your own words 'has been ongoing 11+ years in the Courts' with a public background totalling over 22 years without any prior Court-ordered imposition of the '*in camera*' rule cannot, by any reasonable understanding of the term now be considered '*sub judice*' or otherwise subjected to artificial or belatedly-contrived attempts to prevent open public discussion.

To be clear, the lawfully-scheduled *inter parties* PTI Hearing as listed for May 31<sup>st</sup> in Dublin will be going ahead 'in the interests of justice' according to internationally-accepted 'overriding objective' and 'Competent Domestic Tribunal' rules, irrespective of your Firm's misplaced objections which are in effect, morally, practically and lawfully 'null and void' as shown. However, if members of your Law Firm wish to attend as observers or as participating members of the public, please forward your details to the PTI email address used for this correspondence, including some form of I.D., noting that spaces are limited.

To reiterate – and again, we offer this respectful advisory as a professional courtesy; (i) should RDJ Law (or any such non-participatory agent or agency) attempt to interfere in the said lawful hearing or otherwise improperly inhibit the PTI process; and/or (ii) if any quasi-official actions materially prevent us from completing the same as planned and scheduled; and/or (iii) in the event the Respondent does not properly and lawfully engage; then the People's Tribunal of Ireland – as explained in the aforesaid Rules and referred-to legislation and authorities – will complete the lawful hearing process '*in absentia*', and/or elsewhere, and/or '*in camera*' as variously required, and this explicit notification will stand in defence of whatever actions PTI Council deems necessary.

You might therefore advise your client to participate fully, openly and honestly in his own best interests, and submit his Respondent's Statement to the PTI without further delay.

Thanking you nevertheless for your unanticipated correspondence of May 14<sup>th</sup> last, which conveniently serves as 'proof of service' to the Respondent.

Yours Faithfully.



(Unsigned due to email)

For PTI Council. 15.00hrs Wednesday, 21<sup>st</sup> May 2025.

(Signed original on file at PTI Offices)