

**TRIBUNAL OF INQUIRY INTO ISSUES RELATING TO THE
COMPLAINTS PROCESSES IN THE DEFENCE FORCES AND THE
CULTURE SURROUNDING THE MAKING OF COMPLAINTS
('Defence Forces Tribunal')**

Established by the Government under the Tribunals of Inquiry (Evidence) Acts 1921 to 2011 by statutory instrument signed by the Tánaiste and the Minister for Defence on the 20th day of June 2024.

NOTICE OF INTENDED ORDER FOR DISCOVERY

TAKE NOTICE that the Defence Forces Tribunal intends to make an Order on a date not before the 7th day of August 2026 requiring the Chief of Staff of the Defence Forces to make discovery, on oath, of documents relevant to the Tribunal's Inquiry which are or have been in his possession, power or procurement and which are not captured by the existing Orders for Discovery as made by the Tribunal against the Chief of Staff.

The proposed categories of discovery are discrete and relate to a former Officer who has engaged with the Tribunal during the private investigative phase of its inquiry and comprise:

Category (1)

All documents relating to a complaint made by Officer 300115 / 0/9930 to the Mess President at Air Corps Headquarters in 2005 regarding inappropriate female toilet facilities and accommodation to include, but not limited to, all letters, emails, statements, notes, records of investigations and interviews, reports, determinations, recommendations, recordings, transcripts, memoranda and records of all written and electronic correspondence and communications of any kind relating to the three matters stated herein.

Category (2)

All documents relating to a complaint made by Officer 300115 / 0/9930 to a superior officer in 2008 regarding inappropriate female accommodation in Air Corps Headquarters, Baldonnell, to include, but not limited to, all statements, notes, records of

investigations and interviews, reports, determinations, recommendations, recordings, transcripts, memoranda and records of all written and electronic correspondence and communications of any kind relating to the t matters stated herein.

Category (3)

All documents relating to an allegation made by Officer 300115 / 0/9930 to her Commanding Officer, in or around 2014, that she suffered a sexual assault during the course of her career in the Defence Forces, any response thereto and/or any communications sent by the Commanding Officer to a medical officer or any other person upon receipt of this information to include, but not limited to, all letters, emails, email chains, including email attachments, statements, notes, records of investigations and interviews, reports, determinations, recommendations, recordings, transcripts, memoranda and records of all written and electronic correspondence and communications of any kind relating to the matters stated herein.

Reason for requiring discovery of documents in Categories (1), (2) and (3)

In the light of the information received from Officer 300115 / 0/9930 together with documents received from the Chief of Staff of the Defence Forces, the Minister for Defence, and correspondence received from the CSSO on behalf of the Chief of Staff of the Defence Forces in response to queries raised by the Tribunal (letters dated 9 April, 29 April, 28 May and 25 June 2026), the Tribunal is satisfied that it is necessary and proportionate and in the interests of justice, for it to examine the aforementioned categories of documentation. Such documents and materials are relevant to the Tribunal's Terms of Reference and, in particular, to paragraphs (i), (ii) and (iii) thereof.

Officer 300115 / 0/9930 made complaints of abuse concerning allegations of discrimination on the grounds of gender and made a superior officer/s aware of a sexual assault that she suffered in the course of her service in the Defence Forces. The terms of Categories (1), (2) and (3) are broader than those in the Order for Discovery as against the Chief of Staff dated 30th November 2025 and is intended to capture a wider range of documents concerning the complaints of abuse made by Officer 300115 / 0/9930. Accordingly, discovery and production of the documents and materials set out in

Categories (1), (2) and (3) below are necessary to enable the Tribunal to carry out its functions and to report on the matters of urgent public importance that are set out in the Tribunal's Terms of Reference

The Tribunal considers that in respect of documents falling within the terms of the intended Order for Discovery, it is appropriate, at this time, that the documents be discovered with anonymisation or pseudonymisation of names and other information which might lead to the identification of persons other than that of Corporal 860221. In this regard, a Discovery Protocol governing anonymisation and pseudonymisation will apply.

The terms of the intended Order for Discovery together with the Discovery Protocol are enclosed for your consideration.

Persons who believe that they may be affected by the terms of the intended Order for Discovery may make submissions, in writing, to the Tribunal by close of business on the 6th day of August 2026.