

CORU

IN THE MATTER OF AN INQUIRY PURSUANT TO PART 6 OF
THE HEALTH AND SOCIAL CARE PROFESSIONALS ACT 2005

RE: ANNA MARIE STACK RIVAS

HEARING BEFORE THE PROFESSIONAL CONDUCT COMMITTEE
HELD AT GEORGE'S COURT, GEORGE'S LANE, SMITHFIELD, DUBLIN 7
ON WEDNESDAY, 14TH JANUARY 2026 - DAY 1

1

Gwen Malone Stenography
Services certify the
following to be a
verbatim transcript of
their stenographic notes
in the above-named
action

GWEN MALONE STENOGRAPHY
SERVICES

ATTENDANCES

COMMITTEE MEMBERS: DR. SHANE McCARTHY - CHAIR
MS. ISIBEAL McCOY
MR. JOE O'SULLIVAN

LEGAL ASSESSOR: MR. TOM HOGAN SC

FOR THE CEO: MR. EOGHAN O'SULLIVAN BL

INSTRUCTED BY: MS. HANNAH UNGER
FIELDFISHER SOLICITORS

FOR THE REGISTRANT: NOT IN ATTENDANCE NOR REPRESENTED

COPYRIGHT: Transcripts are the work of Gwen Malone Stenography Services and they must not be photocopied or reproduced in any manner or supplied or loaned by an appellant to a respondent or to any other party without written permission of Gwen Malone Stenography Services

INDEX

WITNESS	<u>PAGE</u>
APPLICATION BY MR. E. O'SULLIVAN	6
LEGAL ADVICE BY MR. HOGAN	33
COMMITTEE DECISION	37
 [REDACTED]	
EXAMINED BY MR. E. O'SULLIVAN	72
 [REDACTED]	
EXAMINED BY MR. E. O'SULLIVAN	78
 [REDACTED]	
EXAMINED BY MR. E. O'SULLIVAN	80
 [REDACTED]	
EXAMINED BY MR. E. O'SULLIVAN	92
 [REDACTED]	
EXAMINED BY MR. E. O'SULLIVAN	94

1 THE HEARING COMMENCED ON WEDNESDAY, 14TH JANUARY 2026,
2 AS FOLLOWS:

3
4 CHAIRPERSON: Good morning.

5 MR. E. O'SULLIVAN: Good morning.

10:25

6 CHAIRPERSON: This is an Inquiry convened under Part 6
7 of the Health and Social Care Professionals Act 2005 in
8 respect of Anna Marie Rivas Stack, physiotherapist
9 registration number PT031856. This Inquiry will be
10 conducted in public.

10:25

11
12 The recording or live-streaming of this Inquiry is
13 strictly prohibited. No one is permitted to make any
14 video or audio or other recording or image whatsoever
15 of any part of the Inquiry. This provision includes
16 photograph, screenshot or screengrab and all like or
17 related mechanisms.

10:25

18
19 I'm Dr. Shane McCarthy and I am a lay person. I am not
20 a registrant of CORU and I am the Chairperson of this
21 Committee. As Chairperson, I am responsible for the
22 conduct of this Committee. I will begin by introducing
23 other members of this Inquiry. Ms. Isibéal McCoy is
24 sitting on my right. She is a registered
25 physiotherapist member. Mr. Joe O'Sullivan is sitting
26 on my far left. He is a registered optometrist member.

10:25

10:26

27
28 Mr. Tom Hogan, Senior Counsel, is sitting to my
29 immediate left. He is the legal assessor to the

1 Committee today. The legal assessor is not a member of
2 the Committee, and the legal assessor's role is to
3 assist and advise the Committee in relation to legal
4 issues that may arise during the course of the hearing.
5 The legal assessor will provide his legal advice to the 10:26
6 Committee of Inquiry in the presence of everybody here
7 today and I will ask the parties to make submissions in
8 relation to the legal assessor's advice.

9
10 I intend to conduct this Inquiry in accordance with 10:26
11 natural and constitutional justice and in accordance
12 with fair procedures.

13
14 During the Inquiry I request the parties or the legal
15 representatives for the parties when making any 10:26
16 submissions to the Professional Conduct Committee to
17 address them to me as Chairperson. The Committee may
18 retire to make its decisions in camera and will
19 consider the submissions made and any legal advice from
20 the legal assessor. 10:26

21
22 I will now take appearances from the parties. However,
23 I note that the Registrant does not appear to be in
24 attendance and that's a matter you might please
25 address. 10:27

26 MR. E. O'SULLIVAN: Yes, thank you, Chair, good
27 morning, Eoghan O'Sullivan on behalf of the Registrar
28 instructed by Ms. Unger.
29

1 I might begin with service, Chair, just to satisfy you
2 that Ms. Stack Rivas is on notice of the Inquiry, and
3 on your iPads I think you should have a core book of
4 documents and also a separate book of correspondence,
5 and then one other separate document. It's called an 10:27
6 affidavit, it doesn't actually appear to be an
7 affidavit but what's called an affidavits from
8 Ms. Stack Rivas dated 12th January. I just might make
9 sure you have access to all that before I begin. So
10 the core book, a book of correspondence and then a 10:27
11 separate document dated 12th January.

12 CHAIRPERSON: Yes.

13
14 APPLICATION BY MR. E. O'SULLIVAN:

15 10:28
16 MR. E. O'SULLIVAN: Thank you. What I might do, Chair,
17 and I know Mr. Hogan will be advising you on this, but
18 Section 57 of the Act identifies what a Registrant has
19 to be told in advance of an Inquiry in terms of
20 notification. And if you open the core book and turn 10:28
21 to page 620, you will see Section 57 of the Act. So
22 that's the core book at page 620. And what that
23 provides, you'll see, is as soon as practicable after a
24 complaint is referred forward, the Registrar has to
25 notify the Registrant of certain things. So at (a) you 10:28
26 will see they have to notify:

27
28 "The referral of the complaint to a committee of
29 inquiry and the name of the committee;

1
2 (b) the nature of the matter that is to be the subject
3 of the inquiry, including the particulars of any
4 evidence in support of the complaint."
5

6 That's, in effect, the allegations, the Notice of
7 Inquiry. And:
8

9 "(c) the opportunity of the Registrant, or his or her
10 representative, to be present and to defend the
11 Registrant at the hearing."
12

13 And 57(2) then says:
14

15 "Not later than 30 days before the date of the hearing
16 before the committee of inquiry, the registrar shall
17 notify the Registrant of the date, time and place of
18 the hearing."
19

20 So they are the things that the Registrant has to do as 10:29
21 a matter of statute in order to satisfy Section 57.
22

23 There are three separate complaints against Ms. Stack
24 Rivas that are before you and the allegations raised in
25 relation to each complaint are dealt with in separate 10:29
26 Notices of Inquiry. So at tab number 1 of the core
27 book you have a Notice of Inquiry in respect
28 of complaint no. C366.

29 CHAIRPERSON: Just one moment.

1 MR. E. O'SULLIVAN: At tab 2, and I'll turn to these
2 Notices in greater detail later, but at tab 2 then you
3 have the Notice in respect of the second complaint.
4 C408 is the reference number of that one. And at tab 3
5 you have a Notice in respect of the third complaint,
6 reference no. C489.

10:30

7
8 If I could ask you then to turn to the booklet of inter
9 partes correspondence, please, and you will see in the
10 index to that particular booklet, which is the first
11 page, that it is subdivided by reference to the
12 individual complaints.

10:30

13
14 So tab A of the book, which runs from page 2 to 47,
15 contains inter partes correspondence relating to
16 complaint C366 from October '24 until June '25.

10:30

17
18 The second tab which runs from page 48 to page 90 is
19 inter partes correspondence in that same range, October
20 '24 to June '25, in relation to complaint C408.

10:31

21
22 And similarly, tab C is correspondence in relation to
23 the third complaint, C489, and that runs from April '25
24 to September '25. That's pages 91 to 148.

10:31

25
26 And you then have inter partes correspondence in
27 relation to all three complaints from September 2025
28 onwards, and that's page 149 to 184.

1 I'm not going to take you through all of that
2 correspondence, but I want to highlight what I suggest
3 are the most relevant letters in terms of being
4 satisfied that Ms. Stack Rivas have been given notice
5 of the Inquiry and the other matters that she has to be 10:31
6 told about.

7
8 so, if you could turn, please, to page 23 of that
9 booklet - and prior to page 23, there is some
10 correspondence with Hayes McGrath solicitors, who were 10:32
11 acting on behalf of Ms. Stack Rivas. They ceased to
12 act for her in or around this time and so all of the
13 material from this point on is sent to her directly and
14 I propose to start from there. There is some
15 duplication in that some material had been sent to her 10:32
16 solicitors previously, but I think it probably makes
17 sense to deal with direct communication with Ms. Stack
18 Rivas from the time she was representing herself.

19
20 so you will see at page 23 an e-mail of 15th May 2025 10:32
21 to [REDACTED] That is her registered
22 e-mail address and attached to this e-mail are various
23 documents. There is a letter to her in relation to
24 complaint C366 and a Notice of Inquiry in relation to
25 C366. There is also a booklet of documents - that's in 10:33
26 effect the disclosure in relation to that complaint.
27 And there's also similar material in relation to
28 complaint C408, but we will come back to that because
29 that is contained in a separate tab.

1 If you turn over the page to page 24 then, you see the
2 letter of 15th May in relation to C366 that was
3 attached. And you'll see in the top left corner that
4 this was sent by e-mail, and you've just seen the
5 e-mail, but also by registered post to her registered 10:33
6 address. She is told under the heading "Grounds" that
7 the complaint has been referred to this Committee, the
8 PCC, so that's in compliance with Section 57(1)(a), the
9 obligation to tell her that a matter has been referred
10 to a Committee and the identity of that Committee. The 10:33
11 role of the Registrar is outlined.

12
13 You will see at the top of the second page of the
14 letter she is specifically told that once the Registrar
15 has presented the Registrar's case to the Committee, 10:34
16 she will have an opportunity to make submissions to the
17 Committee, to call witnesses, and that she is entitled
18 to cross-examine any witnesses called by the Registrar.
19 That I suggest is in compliance with Section 57 (1)(c).
20 And you will see under "Notice of Inquiry", the Notice 10:34
21 of Inquiry is enclosed and that is in compliance with
22 Section 57(1)(b) in effect notifying her of the nature
23 of the matters that would be the subject of the
24 Inquiry.

25 10:34
26 She was told at that Stage that there had yet to be a
27 date assigned for the Inquiry and she was provided with
28 certain other documents, including the expert report
29 and transcripts of video files that you will hear more

1 about in due course.

2
3 You then have the Notice of Inquiry beginning at page
4 28. That was enclosed with that letter. And if you
5 turn to page 36, please, you will see a registered post 10:34
6 docket and there are two registered letters referred to
7 at 9 and 10 once you have page 36. One of them is the
8 letter in relation to C366 that we are discussing and
9 the other is a letter for C408 that we will come back
10 to. And over the page at page 37 you will see that the 10:35
11 registered letter was accepted. It was delivered on
12 the 16th May 2025. The name of the person it was
13 delivered to is recorded as Anna Rivas and there is a
14 signature.

15 10:35
16 You also then at page 38 have the proof of delivery in
17 terms of the e-mail because the system that was used,
18 iManage, confirms to the sender when material that is
19 sent electronically has been viewed, and you will see
20 that the e-mail and the various material that was sent 10:36
21 was viewed by Ms. Stack Rivas on the 29th May.

22
23 Ms. Stack Rivas replied through her own e-mail address
24 - you have that at page 39, and you'll see the e-mail
25 is [REDACTED] It confirms that she 10:36
26 had received the material because you will see the
27 subject line recites the various different complaints
28 and the complaint numbers.

1 The letter that she sent in response is at page 40.
2 It's dated the 20th May 2025 and I'm not going to read
3 it all out, but you will see that she refers to
4 correspondence from CORU of the 17th April in relation
5 to conditions imposed on her practice - I'm going to
6 come back to that in due course. And she goes on to
7 say that:

8
9 *"Having perused all the complaint material, please*
10 *refer from my response points below:*

11
12 *"1. All material referring to the Registrant (ANNA*
13 *MARIE STACK RIVAS DEBTOR PERSON, [REDACTED] are*
14 *in fact related to Anna M. Stack Rivas@2023 the*
15 *Principle Secured Party Creditor, as is evident if*
16 *examined properly.*

17
18 *"2. With regard the condition as per court order in*
19 *relation to CORU complaint C245 and all other pending*
20 *cases namely, C366, C408 and C489, I, Anna M. Stack*
21 *Rivas@2023 have not identified as ANNA MARIE STACK*
22 *RIVAS DEBTOR PERSON, [REDACTED] anywhere therein,*
23 *nor do I consent to being identified as ANNA MARIE*
24 *STACK RIVAS DEBTOR PERSON, [REDACTED] for the*
25 *purpose of this matter.*

26
27 *"3. Any attempt on your behalf to fabricate Joinder*
28 *will be deemed as Parsonage, and I Anna M. Stack*
29 *Rivas@2023 the Principle Secured Party Creditor,*

1 reserve the right to seek adequate remedy in all such
2 instances. Please Note.

3
4 "4. Fieldfisher have also stated in a previous letter
5 that the alleged complainant [REDACTED] is now
6 deceased, it is thus then a fact that I am denied my
7 right to face my 'accuser' and to challenge his
8 accusations that he has laid out in his numerous
9 complaints against me and that are now at the PCC
10 stage, them being C366, C408 and the latest one C489."

11
12 That demonstrates, I suggest, receipt of the
13 correspondence and knowledge of the complaints on the
14 part of Ms. Stack Rivas.

15
16 In relation to complaint C408 then at page 69 you have
17 again the e-mail that you have already seen of the 15th
18 May that attaches the letter and Notice of Inquiry in
19 relation to both C366 and C408.

20
21 And behind that, page 70, you have the letter that was
22 sent on the 15th May specifically in relation to
23 complaint C408, and it's effectively identical in its
24 terms to the one you have already seen in relation to
25 the previous complaint. Again, she is told of the
26 referral to this Committee. This Committee is
27 identified. She is told she has a right to
28 participate, to cross-examine witnesses, to call her
29 own witnesses, and the Notice of Inquiry and certain

1 other documentation, including the expert report, are
2 enclosed. And again I suggest that demonstrates
3 compliance with Section 57(1) of the Act.
4

5 what I am going to call the second Notice then that was 10:39
6 enclosed with that letter begins at page 74.
7

8 And at page 80 you have the An Post docket. Again, you
9 have already seen it because it relates to the first
10 complaint correspondence, and again you have the proof 10:40
11 of delivery over the page at page 81.
12

13 And at page 82, you have the confirmation that the
14 material that was sent electronically was viewed and
15 indeed downloaded by Ms. Stack Rivas on the 29th May 10:40
16 and 30th May and that's at page 32.
17

18 And we have already seen Ms. Stack Rivas's response.
19 It appears again in this bundle of correspondence
20 beginning at page 84, but it's the same letter, I'm 10:40
21 not going to read it out again.
22

23 In relation to the third complaint then, if you turn to
24 page 100, please, you will see there again an e-mail
25 to [REDACTED] dated 28th April 2025 10:41
26 and the letter refers to the fact that Fieldfisher are
27 instructed by the Registrar of the Physiotherapists
28 Registration Board in relation to a decision of the PPC
29 to refer complaint reference C489 to the Professional

1 Conduct Committee. And then in respect of that
2 specific complaint, you will see certain material is
3 attached, including a letter to Ms. Stack Rivas, the
4 Notice of Inquiry specific to C489, a booklet of papers
5 specific to C489 - again, that is in effect the
6 disclosure - and certain other material.

10:41

7
8 And you have the letter that was sent then itself at
9 page 101 and again it is in a similar format to
10 previous letters I have opened to you. It, I suggest,
11 compliance with Section 57(1) in that Ms. Stack Rivas
12 is told of the referral of the complaint to this
13 Committee. This Committee is identified. The Notice
14 of Inquiry is enclosed. So she is fully aware of the
15 matters that are the subject of the Inquiry, and she is
16 made aware of her entitled element to participate in
17 the process, to cross-examine witnesses, to call
18 witnesses and to give evidence herself should she so
19 wish.

10:41

10:42

20
21 At page 104 you will see this material was downloaded
22 by Ms. Stack Rivas on the 2nd May and if you move on to
23 page 110, you will see the Notice of Inquiry that was
24 enclosed. And there is actually a discrepancy between
25 this Notice and the Notice in the core book and I'm
26 going to explain that to you.

10:42

10:42

27
28 At page 110, you will see the preliminary introduction
29 to the Notice refers to a decision of the PPC of the

1 18th February 2025, and that was correct at the time
2 that that Notice was prepared because the PPC had met
3 on the 18th February 2025 and it had referred this
4 particular complaint forward.

5
6 what transpired is that it later emerged that one of
7 the members of the PPC who attended that day was
8 actually no longer a member of the PPC at the time of
9 the meeting. And you will see if you turn to page 121
10 that when this came to light, Fieldfisher wrote to

11 Ms. Stack Rivas by registered post on the 27th May
12 2025, letting her know that it had come to light that
13 the membership of the person concerned had expired in
14 January 2025, and at page 122 you will see two options
15 were set out in relation to how this issue could be
16 addressed. She was told that the first option was to
17 continue on the basis of the decision of the PPC of the
18 18th February and that would mean that matters would
19 progress as they ordinarily would. The alternative was
20 to treat the matter as having been adjourned, i.e. not
21 dealt with by the PPC in substance on the 18th February
22 and in that event the PPC would have to meet again to
23 reconsider the matter. Those two options were outlined
24 to her.

25
26 If you turn to page 125, you will see her response and
27 there's an e-mail of the 11th June 2025 there. She
28 attaches her response in relation to C489 and all other
29 cases, she says, including C366 and 408.

1 And over the page at 126, you have her letter of the
2 11th June and she refers to the complaint. She says:

3
4 *"I refer herein to a letter issued by fieldfisher on the*
5 *27th of May 2025 in relation to the CORU COMPLAINT C489*
6 *for ANNA MARIE STACK RIVAS DEBTOR PERSON, [REDACTED]*
7 *to choose an option in terms of either progressing to*
8 *scheduling an inquiry date for the case in question or*
9 *going back to resitting the Preliminary Proceedings*
10 *Committee (PPC) again owing to an error made by CORU."*

11
12 And she says:

13
14 *"There were also emails issued on the 27th of May 2025 by*
15 *your office in relation to the other pending cases*
16 *against..."*

10:45

17
18 - her. And she then provides a response, which is
19 identical to the response provided were previously. It
20 refers to her as being in fact Anna M. Stack Rivas©2023. 10:45
21 It says that she is not identified as ANNA MARIE STACK
22 RIVAS DEBTOR PERSON, [REDACTED] and so on, but she
23 doesn't actually take either option in terms of agreeing
24 to the matter proceeding or going back to the PPC.

10:46

25
26 At page 130 then, you'll see the response from
27 Fieldfisher on behalf of CORU dated the 1st July 2025.

1 And in the second paragraph, you will see the letter
2 reads:

3
4 "In light of your letter dated 11 June, the complaint
5 against you has been scheduled to be re-considered by
6 the PPC and we understand that our client has been in
7 contact regarding same."

8
9 So because she hadn't agreed to proceeding on the basis
10 of what was a deficient referral, the matter was sent 10:46
11 back to the PPC.

12
13 At page 132, you'll see Ms. Stack Rivas's response to
14 that of the 2nd July 2025. And again she notes CORU's
15 intention to reconvene the PPC on the 8th July to 10:47
16 reconsider the matter. She refers to further e-mails
17 and she provides the same list of points as contained
18 in her other correspondence.

19
20 At page 135, you will see a letter to Ms. Stack Rivas 10:47
21 of 1st September 2025 sent by e-mail and registered
22 post from Fieldfisher. And you'll see in this letter
23 she is told that the PPC met, reconsidered the matter
24 and decided to refer the complaint forward to this
25 Committee, and a Notice of Inquiry is enclosed with 10:48
26 this letter, together with the PPC minute, the PPC
27 brief and further correspondence. And she's told in
28 this letter that the Registrar is seeking to schedule a
29 joint Inquiry in relation to all three complaints and

1 the dates being proposed at that stage were in November
2 2025 and she was asked to revert by the 8th September
3 2025.

4
5 And the correct Notice, if you like, the updated 10:48
6 version of the Notice reflecting the second decision of
7 the PPC can be found at page 138, and that was attached
8 to that letter and that is the version in the core book
9 in relation to the third complaint.

10 10:48
11 At page 145, you will see that the material sent
12 electronically was downloaded by Ms. Stack Rivas on 1st
13 September 2025. The registered post was returned and
14 you'll see at page 148 that the registered post was not
15 reclaimed, but I suggest to you it's clear that the 10:49
16 material was accessed electronically.

17
18 Then at page 150, you have the next letter in the
19 sequence from Fieldfisher to Ms. Stack Rivas of the
20 17th September 2025 and, at that stage, she's told that 10:49
21 the Registrar was seeking to schedule the Inquiry for
22 two days on two of the 14th, the 15th or the 16th
23 January of this year, and she was asked to revert by
24 the 20th September and she was told that if she didn't
25 revert by that deadline, CORU would be proceeding with 10:49
26 scheduling the Inquiry. And you have proof of
27 electronic delivery on page 152. You can see that was
28 viewed by Ms. Stack Rivas on the 17th September, that
29 is the day it was sent. And she replies and you have

1 her reply at page 153. That is e-mail of 17th
2 December. She says:

3
4 "A Chara,
5 Please see attached my letter of Notice to you and
6 CORU.

10:50

7 I trust the position is noted."

8
9 And the letter is at page 154. She says:

10
11 "A Chara,

12
13 "Previous correspondence relating to the above Subject
14 Matter refers.

15
16 "As previously stated, I am the Principal Secured
17 Party Creditor for MS ANNA MARIE STACK RIVAS. I am a
18 Living Woman who holds a Contract of Employment with
19 the HSE since 2017.

20
21 "My Contract of Employment with the HSE does not bind a
22 Living Woman to any Act, nor does it obligate me to
23 register with CORU or any other entity, organisation or
24 corporation.

25
26 "I consider the Subject Matter to be at an end, and I
27 do not wish to contract with you and/or CORU.

28
29 "If you insist in pursuing the Subject Matter further

1 my charge to you and/or CORU will be €25,000 per day.
2 Please Note.

3
4 "I trust the position is noted."

5
6 There is then a further letter from Ms. Stack Rivas.
7 The e-mail to which it is attached is at page 155.
8 This is the 18th September and the letter itself is at
9 page 156. And she says:

10
11 "Previous Notices and correspondence re the above
12 subject matter refers.

13
14 "I refer in this instance to your letter of September
15 the 17th 2025 which crossed with mine to you on even
16 date.

17
18 "I note that you insist on pursuing the Subject Matter
19 and you are proposing 2-day hearing for the
20 Subject Matter.

21
22 "I am agreeable to a 2-day hearing for the Subject
23 Matter on the following Conditions:

24
25 "1. That the 2-day hearing for the Subject Matter and
26 my Constitutional Rights be facilitated in an Éire
27 Court of Record.

28
29 "2. That my charges as per my Notice of 17th September

1 to you are agreed and paid.

2
3 "3. That you will furnish requested documentation and
4 written answers at least 1 month in advance of the
5 hearing date to be agreed between Parties.

6
7 "I trust the above is in order and I await hearing."

8
9 You will see the response on behalf of the Registrar
10 from Fieldfisher sent by e-mail at page 157. There was 10:52
11 also a transcript of a Council meeting of 9th April
12 2021 provided on that date, and I will deal with that
13 later on. You have the letter then at page 158. It's
14 dated 22nd September 2025 and you will see that
15 Fieldfisher said in the second paragraph: 10:52

16
17 "The Registrar is not in a position to comply with the
18 conditions set out in your correspondence, nor is she
19 obliged to do so. She and the Professional Conduct
20 Committee..." 10:52

21
22 - that is this Committee -

23
24 "...have a statutory obligation to proceed with this
25 Inquiry at the earliest opportunity. As such, the
26 Committee will now proceed to fix this Inquiry for
27 hearing within the date range contained in our letter
28 dated 17 September 2025, and you will receive
29 confirmation of the dates in short course."

1 And in terms of documentation, you will see she is
2 referred to various different letters and e-mails
3 attaching documentation and she is also provided with
4 the transcript of the Council meeting of the 9th April
5 2021.

10:53

6
7 And at page 160, you will see that that having been
8 sent electronically, it was viewed by Ms. Stack Rivas
9 on the 24th September 2025, two days after it was sent.

10:53

10 Ms. Stack Rivas duly replies and her e-mail of reply is
11 at page 161. It's dated the 25th September and she
12 attaches a letter. The letter is at page 162. The
13 substantive part of the letter reads:

14
15
16 "In your recent letter you state "The Registrar is not
17 in a position to comply with the conditions set out in
18 your correspondence, nor is she obliged to do so."

19
20 Ms. Stack Rivas then says:

10:54

21
22 "Regarding this statement, which I do not understand,
23 kindly clarify 1) the identity of "The Registrar"
24 and 2) why this Registrar is not obliged to comply with
25 the conditions.

26 You further state "She and the Professional Conduct
27 Committee have a statutory obligation to proceed with
28 this enquiry at the earliest opportunity".
29

1 And she says:

2
3 "And regarding this statement I am asking for you to
4 kindly clarify a) the identity of "She", b) the
5 identity of the sitting members of the Professional
6 Conduct Committee and c) the particulars of the
7 statutory obligation you refer to."

8
9 And she says she awaits confirmation by return within
10 seven days and concludes:

10:54

11
12 "For the avoidance of doubt, please note that I do not
13 consent to any hearing absent agreed conditions."

14
15 Now, Fieldfisher reply by e-mail on the 2nd October.
16 You have the e-mail at page 163 and the letter that was
17 attached at page 164. And this letter demonstrates, I
18 suggest, compliance with Section 57(2) because you will
19 see on the 2nd October 2025, Ms. Stack Rivas was told
20 that the hearing of this matter was scheduled for the
21 14th and 15th January, i.e. today and tomorrow. And
22 you will then see the various queries that she has
23 raised are addressed.

10:54

10:55

24
25 She is told at page 165 that CORU is not willing to pay
26 her €25,000 per day for attending. And the letter goes
27 on to say:

10:55

28
29 "Please note that the Committee is entitled to proceed

1 with the hearing of the inquiry in your absence and in
2 the event that adverse findings are made against you by
3 the Committee, the Council is empowered to impose any
4 one or more of the sanctions provided for in section
5 66(1) of the Act."

6
7 And it goes on:

8
9 "For the avoidance of any doubt, if you do not attend
10 the inquiry on 14 January 2026, the Registrar will rely
11 on this correspondence, and all previous correspondence
12 exchanged, in support of an application to proceed with
13 the inquiry in your absence."

14
15 So, as I have said, I suggest that that letter 10:55
16 demonstrates compliance with Section 57(2) in that much
17 more than 30 days prior to the Inquiry, Ms. Stack Rivas
18 was told of the dates of the Inquiry, and for the
19 avoidance of any doubt, she was told that her
20 conditions were not being agreed to and that the matter 10:56
21 could proceed in her absence.

22
23 At page 166 you will see that that was viewed by
24 Ms. Stack Rivas on the 2nd October.

25
26 She next writes to CORU at 167 on the 15th October
27 attaching a response and her letter is at page 168.
28 She says:
29

1 "Previous correspondence relating to the above Subject
2 Matter refers resting with yours of 02 October 2025.

3
4 "In your letter you state..."

5
6 - and she quotes from the letter where it says that the
7 Committee is entitled to proceed in her absence. She
8 says:

9
10 "I do not accept this statement, and I do not consent
11 to this proposition, please note.

12
13 "My position regarding participation in this hearing,
14 my contract with HSE, and the situation with Acts and
15 Statutes affecting Living Men and Women, remains extant
16 as previously advised.

17
18 "Thank you for confirming the actual members of the
19 Professional Conduct Committee. I am still awaiting
20 confirmation of the individual you describe as "she"
21 and/or " a statutory office holder", please confirm
22 this individual's name by return."

23
24 Fieldfisher reply by e-mail at page 169 and you also
25 see that the core book of documents is attached to this 10:57
26 e-mail of the 30th October 2025 and the e-mail itself
27 is at page 170. The identity of the Registrar is set
28 out, the core book is enclosed and she's provided with
29 information in relation to the various witnesses whom

1 the Registrar intends to call.

2
3 And you will see at page 173, that is viewed by
4 Ms. Stack Rivas on the 30th October and it is
5 downloaded by her on the 31st October.

10:58

6
7 At page 174 then, you will see on the 19th November,
8 she is written to and provided with a further witness
9 statement. She is told in that letter as well, again
10 for the avoidance of any doubt at page 175, that the
11 Inquiry would be taking place in this building and that
12 it would be commencing at 10:00 a.m. on the 14th
13 January 2015. So, again, lest there had been any doubt
14 as to the time and place of the Inquiry in addition to
15 the date, that is all set out there.

10:58

16
17 And at page 176, you will see that that was viewed and
18 downloaded by Ms. Stack Rivas on the 20th November.
19 She sent a further letter, which you will see at page
20 182, sent by e-mail on the 8th December, and that
21 encloses an updated statement. It's a statement from
22 Ms. Unger, who is my solicitor, and that was viewed on
23 the 8th December.

10:59

24
25 And then on Monday, Fieldfisher received what is
26 described as an affidavit - and that's the document you
27 have separately in the iPad...(INTERJECTION)
28 CHAIRPERSON: Do you wish us to go to that document
29 now, Mr. O'Sullivan?

10:59

1 MR. E. O'SULLIVAN: Yes. Thank you, Chair. So it's
2 entitled:

3
4 "The Matter Of CORU THE HEALTH AND SOCIAL CARE
5 PROFESSIONALS' COUNCIL "The Corporation" -and-
6 Anna-Marie Stack Rivas "The Sovereign Living
7 Constitutional Woman"."

8
9 As I've said, it's described as an affidavit. It
10 doesn't seem to actually be an affidavit but, in any
11 event, she begins to deal with the jurisdiction. She
12 says:

11:00

13
14 "1. I am the Sovereign Living Constitutional Woman in
15 the above referenced Matter, and I make this Affidavit
16 from facts within my own knowledge, save where
17 otherwise appears, and where so appearing I believe
18 same to be true.

19
20 "2. I am the Principal Secured Party Creditor and the
21 Occupier of the Office of Executor General for the
22 ANNA MARIE STACK RIVAS Person Debtor.

23
24 "3. I am a Private Citizen and a Sovereign Claimant in
25 the Sovereign Republic of Éire.

26
27 "4. I say My Rights are Sovereign & Indefeasible and
28 are protected under the Brehon Laws, Customary Common
29 Law and Natural Law.

1 "5. As a Private Citizen I am entitled to rely on the
2 Protective Provisions as enshrined in the Articles of
3 An Bunreacht 1937.

4
5 "6. As a Sovereign Claimant in Éire I am entitled to
6 rely on the Protective Provisions as enshrined in the
7 Articles of the Constitution of the Republic of Ireland
8 , proclaimed in arms on Easter Monday, April 24th,
9 1916, and established by the Will and Wish of the
10 People of Ireland on January 21St 1919."

11
12 Then under "Background" over the page:

13
14 "7. I graduated from Trinity College Dublin with a BSc.
15 (Hon) in Physiotherapy in 2010.

16
17 "8. On 16th March 2017 I entered into a Contract of
18 Employment ("the Contract") with the Health Services
19 Executive where it is stated at Para 18. Disciplinary
20 Procedure The Health Service Executive requires that
21 you conduct your duties in such a way as to achieve
22 high standards of work practice and patient/client
23 care. In the event of your failure to achieve these
24 standards the disciplinary procedure will be invoked.
25 Details of the Health Services Executive disciplinary
26 procedure are available on the website..."

27
28 - and it says:
29

1 "...or through your supervisor..."

2
3 - and she attaches that contract. She says:

4
5 "9. In or around 2019 I was advised by supervisor that
6 all employees must register with CORU as a matter of
7 policy. I did sign a CORU Statutory Declaration ("the
8 Declaration") as part of this process where it is
9 stated at PARA 16. I understand that if a complaint is
10 made about me I may become the subject of the
11 complaints, inquiries and discipline provisions of the
12 Health and Social Care Professionals Act, 2005."

13
14 And she attaches that. She says:

15
16 "10. I say that the Contract of Employment with HSE is
17 the overriding Contractual Position and I say further
18 that PARA 16 of the Declaration is intrinsically linked
19 to PARA 18 of the Contract and that PARA 16 of the
20 Declaration, does not, and cannot be construed to, go
21 beyond my hours of employment with my employer."

22
23 At paragraph 11, she says:

24
25 "I say that any attempts by CORU to directly interfere
26 with, or control my life, outside of my hours of
27 employment with my employer, is a direct attack on my
28 Sovereign and Indefeasible and Constitutional Rights,
29 and any legislation being relied on by CORU to support

1 any such actions is repugnant to the Constitution(s)."

2
3 And they she says she attaches a copy of her witness
4 statement as previously furnished to her previous
5 solicitors to be produced as necessary. And that is 11:03
6 affirmed it says on the 31st December. You will see
7 Ms. Stack Rivas's name is there. There is no solicitor
8 or a commissioner for oaths' name or anything like
9 that, which is why I say it's not actually an
10 affidavit. 11:03

11
12 I don't propose to take you through any of the
13 attachments, save to refer you for now to her witness
14 statement which begins at page 18. She does deal with
15 some of the allegations in that, so at a later stage in 11:03
16 the process I fully intend to take you through that,
17 but I don't think for present purposes it is necessary.

18
19 So, Chair, as you well know, a Registrant has certain
20 rights and entitlements when it come to an Inquiry such 11:04
21 as this. As a matter of statute and as a matter of
22 fair procedures, they have to be told when the Inquiry
23 is on. They have be given at least 30 days' notice of
24 the hearing. They have to be provided with all of the
25 material that will be relied upon against them. They 11:04
26 have to be told what the allegations against them are.

27
28 All of those things were done in this particular case
29 and done long before 30 or so days before the Inquiry.

1 Ms. Stack Rivas has had the disclosure, has had the
2 Notice of Inquiry and has had all of the relevant
3 material, certainly the vast majority of it for many,
4 many, many months.

5
6 She doesn't have to participate in this process. She
7 is entitled to but doesn't have to. What she cannot do
8 is dictate to this Committee how it goes about dealing
9 with this Inquiry - in other words, how it performs its
10 statutory function. Nor can she impose conditions on
11 this Committee or CORU in terms of, amongst other
12 things, her being paid for her attendance before the
13 Inquiry.

14
15 She has been told that CORU is not in a position to
16 agree her proposed terms and she has elected in those
17 circumstances not to participate. It's a voluntary
18 decision on her part. It has consequences for her. It
19 means that she is not here to test the evidence that
20 has been called today. If she doesn't attend tomorrow,
21 it means she is not here to test the evidence that is
22 called tomorrow. But that is a decision she has made
23 herself and in all the circumstances, Chair, I
24 respectfully suggest that there is no reason not to
25 proceed with this Inquiry in circumstances where
26 Ms. Stack Rivas has been served, the statutory
27 requirements have been complied with and she has chosen
28 for her own reasons, good, bad or indifferent, not to.
29 So I am seeking to proceed.

1 CHAIRPERSON: Before the Committee - is your
2 application that service is good and that your
3 application is to proceed in the absence of the
4 Registrant?

5 MR. E. O'SULLIVAN: Yes, Chair. 11:06

6 CHAIRPERSON: Before the Committee will deliberate on
7 that application, I propose that we will take advice
8 from the legal assessor to the Committee, Mr. Hogan.
9 But you will of course get an opportunity to comment on
10 any advice. 11:06

11 MR. E. O'SULLIVAN: Thank you.

12
13 LEGAL ADVICE BY MR. HOGAN:

14
15 MR. HOGAN: Yes, thank you, Chair and members of the 11:06
16 Committee. Good morning, everyone.

17
18 As Mr. O'Sullivan has set out, there is an obligation
19 as soon as practicable after a complaint is referred
20 under Section 56 of the Act to a Committee of Inquiry 11:06
21 upon the Registrar to notify the Registrant to whom the
22 complaint relates of the following matters:

23
24 Firstly, the referral of the complaint to a Committee
25 of Inquiry in the name of the Committee. 11:06

26
27 Secondly, the nature of the matter that is to be the
28 subject of the Inquiry, including the particulars of
29 any evidence in support of the complaint.

1 And, thirdly, the opportunity of the Registrant or his
2 or her representative to be present and defend the
3 Registrant at the hearing.

4
5 Mr. O'Sullivan has taken you very carefully through all 11:07
6 of the material that has been furnished to the
7 Registrant in respect of each of the individual
8 complaints, being complaints nos. C366, C408 and C489.

9
10 In each case, he has pointed you to the fact that the 11:07
11 Registrant was notified that the complaints, the
12 respective complaints had been notified to a Committee
13 of Inquiry and the identity of that Committee of
14 Inquiry.

15 11:08
16 In each case, the Registrant was furnished with a
17 Notice of Inquiry setting out in detail the allegations
18 against the Registrant and the particulars of any
19 evidence in support of the complaint.

20 11:08
21 And in each case the Registrant was given an
22 opportunity to - or given notification that she would
23 be provided the opportunity either in person or by her
24 representative to be present and to defend herself at
25 the hearing of any Inquiry. 11:08

26
27 Obviously you must be satisfied that these mandatory
28 steps have been complied with on the basis of the
29 material that has been opened to you by Mr. O'Sullivan.

1 In addition to this, Section 57 provides that not later
2 than 30 days before the date of the hearing before the
3 Committee, the Registrar shall notify the Registrant of
4 the date, time and place of the hearing. And, again,
5 Mr. O'Sullivan has opened up the correspondence with 11:09
6 the Registrant in relation to the holding of the
7 Inquiry and the setting of the date for today's date
8 and tomorrow's date, and the correspondence that passed
9 between the Registrar and the Registrant. And, as you
10 have heard or as you have seen from that 11:09
11 correspondence, effectively the Registrant sought to
12 impose conditions upon her participation in the
13 Inquiry, and those conditions were not seen as
14 reasonable or appropriate by the Registrar and were
15 declined. 11:09

16
17 You obviously must satisfy yourselves that the
18 Registrant has been given proper notice that the
19 Inquiry would proceed today. You will have seen in
20 relation to the letter from the Registrar I think of 11:10
21 the 2nd October 2025, which was giving notice of the
22 Inquiry - and also confirming that the Registrar would
23 not agree to the conditions proposed by the Registrant
24 - that the Registrant was warned that the Inquiry would
25 proceed in her absence, were she not to attend. 11:10

26
27 Obviously the Registrant came back I think and
28 responded on the 15th October, suggesting that she
29 didn't agree that the Inquiry could proceed in her

1 absence.

2
3 A Registrant has a prima facie entitlement to be
4 present and to participate in an Inquiry into their
5 conduct in the face of allegations of misconduct or 11:11
6 otherwise. However, that is not an absolute right and
7 it is - a Committee of Inquiry is entitled in
8 appropriate circumstances to proceed in the absence of
9 a Registrant. But first, obviously, you should be
10 satisfied that it would be fair to do so. 11:11

11
12 In this case, there is no suggestion from the
13 Registrant that she is in any way unable to attend the
14 Inquiry but would wish to participate. Instead, she
15 has imposed conditions which are not satisfactory or 11:11
16 appropriate and perhaps you may form a view in relation
17 to that. But you may take the view that, in effect,
18 the Registrant has waived her entitlement to
19 participate in the Inquiry. These are matters that you
20 should decide in considering whether to proceed in her 11:12
21 absence.

22
23 Those are my advices, Chair.

24 CHAIRPERSON: Mr. O'Sullivan, do you have any comment
25 to make on the advice? 11:12

26 MR. E. O'SULLIVAN: I agree with Mr. Hogan's advice.

27 CHAIRPERSON: Do any members of the Committee have any
28 questions on the advice or for Mr. O'Sullivan?

29 MR. J. O'SULLIVAN: No.

1 CHAIRPERSON: In that case, the Committee will rise and
2 deliberate on the matter and we will come back to you
3 as soon as we can.

4 MR. E. O'SULLIVAN: Thank you.

11:23

6 THE HEARING ADJOURNED BRIEFLY AND THEN RESUMED, AS
7 FOLLOWS:

9 COMMITTEE DECISION:

11:35

11 CHAIRPERSON: Thank you all for returning so promptly.
12 The Committee have carefully considered all of the
13 documentation and are satisfied that the service of the
14 matter has been properly effected and are satisfied to
15 proceed with the Inquiry on today's date. Full written
16 reasons for this decision will be included in the
17 written decision to issue on the conclusion of the
18 matter in due course. You may proceed, please,
19 Mr. O'Sullivan.

11:35

20 MR. E. O'SULLIVAN: Thank you very much, Chair.

11:35

22 As you will have gathered, Ms. Stack Rivas is a
23 physiotherapist and she works and resides in [REDACTED].
24 She was the subject of a complaint made by a member of
25 the public, [REDACTED] in February of 2021 in which
26 it was alleged that she was disseminating publically
27 disinformation in relation to the coronavirus and masks
28 and vaccines. And it all seems like a very long time
29 ago, but you will remember February 2021 was a period

11:36

1 of time when we were really in the teeth of the
2 pandemic. You will hear evidence about this in due
3 course and I am sure you all recall but there had been
4 mutterings about a novel coronavirus in China in late
5 2019 and by March of 2020 you will recall when the 11:36
6 Taoiseach was in Washington for the St. Patrick's
7 festivities there, he announced that we would be going
8 into lockdown and what followed was the first lockdown
9 and then during 2020 and 2021, varying degrees of
10 restrictions imposed, including a number of other 11:37
11 lockdowns, and that was all dictated by public health
12 guidance emanating from the Government with the
13 assistance of bodies such as NPHET and so on.

14
15 And the complaint that was made by [REDACTED] in 11:37
16 February of 2021 was considered by the Council of CORU
17 in April of 2021 for the purpose of deciding whether to
18 make an application to the High Court to suspend
19 Ms. Stack Rivas's registration. And you will know that
20 the Council has the power to apply to the High Court 11:37
21 for what's known as an interim suspension to prohibit
22 someone from practising pending a disciplinary
23 investigation and, if appropriate, Inquiry into their
24 conduct.

25 11:38
26 The transcript of the Council meeting that was held in
27 April of 2021 is in your core book and you have it at
28 page 403 - sorry, it starts at page 364, in fact. It's
29 the transcript of the 9th April 2021. So the

1 transcript...(INTERJECTION).

2 MR. HOGAN: Sorry, could you give us the page reference
3 again?

4 MR. E. O'SULLIVAN: It begins at 364. Is it easier for
5 you to use tab numbers or page numbers? I find 11:38
6 electronically page numbers.

7 CHAIRPERSON: Page numbers is handier for me anyway,
8 Mr. O'Sullivan, thank you.

9 MR. E. O'SULLIVAN: So it begins at page 364. And
10 you'll see that's a meeting of Council of the 9th April 11:39
11 2021. Ms. Stack Rivas was represented at that
12 particular meeting by Liz Lyons of Hayes McGrath
13 Solicitors instructing Elaine Finneran BL, and
14 McDowell of Fieldfisher appeared on behalf of the
15 Registrar. And as I have said, the issue that Council 11:39
16 was considering was whether in the light of the
17 complaint that had been received from [REDACTED] it was
18 appropriate to apply to the High Court to suspend
19 Ms. Stack Rivas's registration.

20 11:39
21 You will see if you turn to page 403 of the book, which
22 is internal page 40 of that transcript, that
23 Ms. Finneran offered undertakings on behalf of
24 Ms. Stack Rivas at that stage. So at the bottom of
25 page 403, you will see this is Ms. Finneran addressing 11:40
26 Council and she says:

27
28 "Finally, Mr. McDowell has referred to the fact that
29 the Registrant is willing to provide certain

1 undertakings and I would submit that these proposed
2 undertakings are sufficient to meet any concerns that
3 there may be in respect of the public. I think the
4 Council should have them before them and I will just go
5 through them and I have discussed them with the
6 Registrant. She understands the significance and the
7 seriousness of giving an undertaking.

8
9 "First of all there is an undertaking to continue to
10 refrain from discussing or expressing personally-held
11 views in relation to Covid 19 with patients and service
12 users.

13
14 "Secondly, an undertaking to continue in the course of
15 employment to engage and follow HSE guidelines and
16 protocols in respect of Covid-19 procedures to include
17 social distancing and the wearing of face coverings.

18
19 "Thirdly, to refrain from holding herself out as a
20 physiotherapist and/or HSE employee if or when
21 expressing views in relation to the government's
22 handling of and approach to Covid-19 and/or -- sorry,
23 if or when expressing views as to the efficiency or
24 necessity of public health guidelines relating to
25 Covid-19."

26
27 And she says:

28
29 "I say that that third undertaking would in particular

1 address the concern that the Registrar has raised in
2 terms of the potential influence that is suggested of
3 the Registrant's position as the physiotherapist. The
4 Registrant is prepared to give each of these
5 undertakings and I say that that would be an
6 appropriate way to deal with the matter."

7
8 And you'll see at page 423 that having considered the
9 matter, the Council decided that an application to the
10 High Court pursuant to Section 60 was not necessary to 11:41
11 protect the public, and they reached that decision in
12 part at least by reason of the undertakings that had
13 been offered and they received and accepted those
14 undertakings from Ms. Stack Rivas.

15 11:42
16 while [REDACTED] first complaint was being
17 investigated and while it was being considered by a
18 Fitness to practise Committee, because it has been
19 disposed of by another Fitness to Practise Committee,
20 he submitted a number of other complaints, and what had 11:42
21 transpired was in preparation for the first Inquiry
22 [REDACTED] had brought to CORU's attention certain
23 additional videos and audio files that he said
24 demonstrated further publication of disinformation by
25 Ms. Stack Rivas, and a decision was taken that that 11:42
26 additional material was not captured by the first
27 complaint and it would not be appropriate to seek to
28 augment the first complaint to capture additional
29 allegations. And so what [REDACTED] did was he made a

1 number of fresh complaints to CORU based on this
2 additional material.

3
4 So all of the material that is before you is material
5 that was not considered in the first Inquiry held in 11:43
6 relation to Ms. Stack Rivas. And the complaints made
7 by [REDACTED] that are before you are very similar in
8 their nature and in their scope to the first complaint
9 that he made, that they all concern what he says is the
10 spreading of disinformation by Ms. Stack Rivas in 11:43
11 relation to, amongst other things, Covid, in relation
12 to vaccines and in relation to certain other matters,
13 including the wearing and utility of masks.

14
15 You will see the first complaint - when I say the first 11:43
16 complaint, I mean the first complaint before you. It
17 is, in fact, the second complaint that was made by
18 [REDACTED] but it is the first one before you at page
19 30 of the core book. And you have an e-mail there were
20 [REDACTED] of the 23rd June 2023 and he says: 11:44

21
22 "To whom it may concern

23
24 "I wish to file another complaint about the respondent
25 Anna Marie Stack Rivas. It involves two further online
26 videos posted on Rumble and Odysee which contain wild
27 and unsubstantiated claims, conspiracy theories and
28 medical misinformation which I feel could put the lives
29 of the public at risk and obviously could be seen to be

1 bringing the profession of physiotherapy into
2 disrepute."

3
4 He goes on just to put this complaint in context in
5 terms of the timing. He says:

11:44

6
7 "I understand a provisional date of July 17th next is
8 booked for the respondent's hearing..."

9
10 - that relates to the previous complaint dealt with -

11:45

11
12 "...and I would like this new evidence to be presented
13 to that hearing. I include transcripts of both videos
14 and screenshots which show view counts. I ask that you
15 make contact as soon as possible in order for a
16 statement to be taken."

17
18 And the complaint form is attached to that particular
19 e-mail. The thrust of the complaint that is made is
20 contained at page 35 in section 3, which is the details 11:45
21 of the complaint, and he refers to a video from
22 rumble.com which is described as being
23 "andys-conversations-part-2" and another video from
24 rumble.com described as "limerick-city-rally-speeches".
25 And at page 35, he says these were recorded in February 11:45
26 and July 2022 respectively, and in terms of what
27 happened, at the bottom of page 35, he says:

28
29 "The respondent makes numerous false, misleading and

1 dangerous statements regarding vaccines, Covid-19 and
2 she speaks of many conspiracy theories. I feel that the
3 respondent brings the profession of physiotherapy into
4 disrepute."

5
6 And you have seen there are two videos that he referred
7 to there. The first video is the subject of allegation
8 1 in Notice of Inquiry no. 1. So if you could turn
9 back to page 3, please, you will see the first Notice
10 of Inquiry. I'm not going to open it in full now, but 11:46
11 you will see allegation no. 1 at the bottom of page 3
12 into page 4 is an allegation in relation to events on
13 or around the 5th February 2022. And it refers to
14 comments made at an unidentified location at a public
15 event. And, amongst other things, at (a), (b), (c) and 11:47
16 (d) you will see there are references to the science
17 not being followed, masks being harmful, people being
18 censored, there being no science behind the wearing of
19 masks, they're more harmful than good. There is
20 reference in relation to vaccines for Covid to it not 11:47
21 being a vaccine:

22
23 "It's a bloody genetic therapy. So people don't realise
24 that their DNA and RNA are being interfered with. "

25
26 There are references to the flu vaccine and people
27 being bribed into taking the flu shot and this
28 experimental vaccine, being the Covid vaccine. There
29 are references to people being bullied and intimidated

1 into taking that vaccine, and references to the leader
2 of NPHET lying to people.

3
4 A transcript has been prepared and we will be showing
5 you the video in due course, but a transcript has also 11:48
6 been prepared for everybody's ease of reference of what
7 is said at that particular meeting as reflected by the
8 video, and the transcript is in the core book and I
9 will refer you to that in due course in the evidence.

10 11:48
11 The second video then that [REDACTED] raised in this
12 particular complaint relates to an event of the 24th
13 July 2022 and that is the subject of Allegation 2 in
14 this Notice. And again it relates to Ms. Stack Rivas
15 speaking at a public event where she identified herself 11:48
16 as a healthcare worker and where she made various
17 comments. And you will see there are quotations from
18 the video at (a), (b), (c), (d) and (e) and they
19 include things like references to "this 'so called
20 vaccine', this gene therapy shot that they've been 11:49
21 giving people" without proper informed consent; a
22 suggestion that since vaccines for Covid have started,
23 there has been a huge mortality rate in family members
24 taking it and a sudden increase in deaths between
25 people in their 30s and 50s. There is a suggestion 11:49
26 that these people who have taken the vaccine are:

27
28 "...ruined for life and it either takes you, kills you
29 or it it'll actually damage your immune system..."

1
2 - for years. There is a suggestion that the Government
3 were accessories to murder; a suggestion that corrupt
4 politicians and scientists are manipulating people in
5 relation to COVID-19 vaccines; and a suggestion that 11:49
6 the coronavirus is no different to the common cold and
7 that vaccines - masks, rather, in this instance do
8 nothing.

9
10 Ms. Stack Rivas was represented at that stage by her 11:49
11 union and you will see their response to this
12 particular complaint on her behalf beginning on page
13 67. And what is particularly significant about this
14 response, I suggest, and I will open the relevant
15 paragraphs to you, is that she doesn't dispute that she 11:50
16 made the comments attributed to her. She doesn't
17 dispute that it was her speaking at these events. She
18 doesn't say that's not me, that's not a real video,
19 that's been falsified, that's been manipulated. On the
20 contrary, what is said on her behalf by Fórsa is she 11:50
21 was exercising her right to free speech at the relevant
22 time. So there is no dispute, I respectfully suggest,
23 raised by Ms. Stack Rivas tellingly as regards whether
24 these videos do in fact capture her speaking at these
25 particular events. 11:50

26
27 So you have the letter of 7th September 2023 at page
28 67. It deals with a procedural issue in the first
29 instance, which was that Fórsa hadn't been made aware

1 of this complaint prior to [REDACTED] being
2 cross-examined in the Inquiry that was then underway.
3 But you will see in relation to the videos at page 68,
4 they say in bold:

5
6 "Without prejudice to the ongoing hearing, we say that
7 in the videos presented by [REDACTED] dating to
8 February 2022 and July 2022, Ms Stack Rivas is simply
9 exercising her constitutional right, as enshrined in
10 the Irish Constitution, to freely express her
11 convictions and opinion.

12
13 "We say that in the videos now provided by [REDACTED]
14 Ms Stack Rivas has, at no time held herself out to
15 be..."

16
17 - a physiotherapist - it says "Physiotherapy", that's a
18 typo -

19
20 "...or a HSE employee when expressing her views.

21
22 "In light of the foregoing, we ask of the Committee
23 when considering this matter not to entertain or
24 encourage a pattern of repeated complaints from this
25 gentleman."

26
27 So that, I suggest, is an acknowledgment on the part of
28 Ms. Stack Rivas that it is her speaking at these events
29 and an invocation on her part in error, as I will

1 submit in due course of what she considers to be her
2 right to freedom of expression insofar as these
3 comments are concerned.
4

5 [REDACTED] then submitted a second complaint, his third 11:52
6 complaint in the totality of events, but the second
7 complaint before you, and you have that beginning at
8 page 139 and the e-mail itself is at page 145, page 145
9 of the PDF. It is the 24th October 2023 and he says:

10
11 "To Whom it may concern,
12

13 "I wish to resubmit evidence that I recently learnt was
14 inadmissible. I first submitted in 2021 a video and
15 transcript of Anna Marie Stack Rivas (PT031856)
16 speaking at an event at Bedford Row, Limerick which was
17 streamed live on Facebook on July 31, 2021. I learnt on
18 September 25, 2023 that the video and transcript were
19 inadmissible due to case law from 2017."
20

21 That is reference [REDACTED] being told that he
22 could only give evidence at the first Inquiry in
23 relation to the videos he had referred to in his first
24 complaint. That is what at that refers to. And he
25 says:
26

27 "In the interest of fairness and natural justice, I
28 would like the evidence to be considered as a new
29 complaint by the Preliminary Proceedings Committee

1 (PPC) . "

2
3 His complaint form then is immediately behind that
4 e-mail. It begins at page 146. And again in terms of
5 the detail, at page 150 under the section entitled
6 "what happened?" he says:

11:54

7
8 "The respondent makes numerous false, misleading and
9 what I contend are dangerous statements regarding
10 vaccines, Covid-19 and she speaks of many conspiracy
11 theories. I feel that the respondent brings the
12 profession of physiotherapy into disrepute. She speaks
13 about specialities of medicine that she is apparently
14 unqualified to give an honest assessment of, eg.
15 Virology, epidemiology, immunology."

16
17 Hayes McGrath Solicitors submitted a response to this
18 complaint on behalf of Ms. Stack Rivas and that begins
19 at page 195. It's page 194, in fact. It's 10th
20 January 2024, page 194, to the case officer, and they
21 take issue with [REDACTED] effectively submitting
22 repeated complaints against Ms. Stack Rivas and a
23 submission was made to the PPC to the effect that this
24 was being done in bad faith. I think that was
25 something the PPC dealt with and ultimately all
26 complaints were referred forward. But in relation to
27 the content of the allegation and the substance of what
28 was raised in the complaint, if you turn to the second
29 page of the letter and the second paragraph you will

11:55

11:55

1 see, on instruction presumably, Hayes McGrath said:

2
3 "The conduct complained of in the subsequent
4 complaints, occurred outside of the context of
5 Registrant's employment and outside of her role as a
6 Physiotherapist. The Registrant does not identify
7 herself as a Physiotherapist in the videos referred to
8 in Complaint C366..."

9
10 - which we have already looked at -

11:56

11
12 "...or C408..."

13
14 - which is this second complaint. So, again, it is
15 instructive to note that not for one moment does
16 Ms. Stack Rivas suggest that this is not her on the
17 video, that this video has been manipulated in any way.
18 On the contrary, what is said is this occurred outside
19 of her employment and outside of her role as a
20 physiotherapist, and Hayes McGrath highlight that she
21 doesn't refer to herself as a physiotherapist in the
22 videos.

11:56

11:56

23
24 And there is a transcript of the relevant video that
25 has been prepared. Again, as with the two videos the
26 subject of the first Notice of Inquiry, we are going to
27 show you clips and we have provided you with a
28 transcript, and I will refer you to the transcript in
29 due course.

11:56

1 You then have the third complaint that is before you
2 that was submitted. That begins at page 228. That's
3 an e-mail from [REDACTED] of 5th September 2024, page
4 228. He describes it as his fourth complaint about
5 Ms. Stack Rivas. He says:

11:57

6
7 "It's clear that Mrs Stack Rivas is a conspiracy
8 theorist and deluded. She is involved with a
9 quasi-military council called the IRB - the Irish
10 Republican Brotherhood Supreme Council and claims to be
11 the Secretary for Health."

12
13 He refers to people who he says are associated with
14 that organisation. And then after a number of links,
15 he says:

11:57

16
17 "She makes many outlandish and outrageous claims
18 particularly about immigration. She is a hatermonger.
19 She claims that the expert witness [REDACTED]
20 lied in her testimony and report in the previous case
21 (C245)."

22
23 And he, you will see, attaches various other links,
24 including a link in relation to a person by the name of
25 Sarah Plumley, which you will see. And there is
26 various attachments to that complaint, including
27 material from this body call the Irish Republican
28 Brotherhood and so on.

11:58

1 The complaint form itself begins on page 233 and,
2 sadly, while this complaint was being investigated,
3 [REDACTED] died and the complaint remained in being, in
4 effect, with the Registrar stepping into the shoes of
5 [REDACTED] if you like, given that he had sadly passed 11:58
6 away.

7
8 And as with the other complaints that I have referred
9 you to, the PPC ultimately decided that there was a
10 prima facie case of professional misconduct, and this 11:59
11 complaint and the two other complaints I referred you
12 to were referred forward on that basis.

13
14 And if you turn back to the second Notice of Inquiry,
15 which is the allegations in relation to the second 11:59
16 complaint that I have referred you to, it begins at
17 page 11, you will see that is a complaint that on the
18 31st July 2021, again at a public event where she
19 identified herself as a healthcare worker, Ms. Stack
20 Rivas said a number of things, and you have the 11:59
21 relevant quotations at (a), (b), (c), (d), (e), (f),
22 (g), (h) and (i) and they include things like saying
23 that Covid-19 was an absolute scam; people had been
24 conned; the media were censoring the truth; it's a lie;
25 "If we had a real pandemic you would see our graveyards 12:00
26 full"; the coronavirus had been planned for a long
27 time; cases were being pulled "out of their ass" by the
28 HSE; nobody died from Covid; there's a reference to the
29 suggestion that Covid is highly contagious as BS; in

1 relation to the wearing of masks, people have been
2 brainwashed; references to a fake test insofar as
3 testing regime was concerned; a reference in relation
4 to vaccines, at (h), as generally causing, maiming and
5 damaging and killing kids, "they're causing chronic 12:00
6 illnesses in our children"; a suggestion that the
7 hospitals were emptier than normal during Covid; the
8 suggestion that they were overwhelmed was not true; and
9 a reference to vaccines for Covid as experimental
10 shots. 12:01

11
12 Again, as I say, we will show you that video and we
13 have a transcript for you of it.

14
15 The third Notice of Inquiry begins at page 17 and, 12:01
16 again, the first allegation relates to this podcast
17 hosted by Sarah Plumley in March '24. You will see the
18 interview in due course and we have a transcript of it
19 and you will see again the criticisms that are raised
20 are set out at (a) to (i). 12:01

21
22 There are references to not trusting the medical
23 establishment; they are lying, there has been no
24 informed consent. She calls Covid "Convid". There is
25 a suggestion that the mandatory vaccination was brought 12:02
26 in as part of a "plandemic" which didn't exist, it was
27 all made up, it was a hoax; people who disagree are
28 being censured; Covid was "pure absolute fraud and
29 murder".

1 Again, in terms of vaccines that they are killing
2 people, they are maiming children; a specific reference
3 in this content to the HPV vaccine, as well as the
4 Covid vaccine; a reference at (g) to HPV and cervical
5 screening causing cancer.

12:02

6
7 And you will see at (h) Ms. Stack Rivas' commentary in
8 relation to the outcome of the first Inquiry, and, in
9 particular, a suggestion that the finding of a censure
10 was made in the teeth of advice she got, but also it's
11 described as "the second lowest form of punishment",
12 "just a rap on the knuckles".

12:03

13
14 The outcome of the first inquiry, I should say, was a
15 censure and the attachment of conditions to Ms. Stack
16 Rivas's registration, and that was based upon
17 admissions she made, that she had made to the comments
18 attributing to her, and the defence that was put
19 forward was that she was exercising her free expression
20 and that her conduct did not amount to professional
21 misconduct.

12:03

22
23 The second allegation then relates to another video
24 relied upon which [REDACTED] It's from December of
25 2023. Again, we'll play this for you and again we have
26 a transcript for you. And again it's similar in terms
27 of its content, references to the pandemic being a scam
28 and so on.

12:03

1 And then the third allegation in that Notice is an
2 allegation that in saying what she did as captured by
3 Allegations 1 and 2, Ms. Stack Rivas acted in breach of
4 her undertaking to Council of the 9th April 2021, which
5 you have seen, in that she identifies herself as a
6 physiotherapist and/or HSE employee when making these
7 comments and speaks in the manner that she does.

12:04

8
9 So it has never been disputed by Ms. Stack Rivas that
10 she has said any of the things that have been
11 attributed to her. You will get to see the videos for
12 yourself. What she has said instead is that she was
13 exercising her right to express her opinions and that
14 she's not guilty of professional misconduct because
15 this occurred outside of the workplace. And she deals
16 with this in a little bit of detail in the so-called
17 affidavit that I referred you to earlier where she
18 exhibits her statement. So, if you could back to that
19 document, I will open it now so that you can see what
20 her position is. So it's separately uploaded to your
21 platform, and the statement begins at page 18 of 23 of
22 that PDF bundle, if you have it.

12:04

12:04

12:05

23 CHAIRPERSON: What was the title of the bundle?

24 MR. E. O'SULLIVAN: For me it's "The matter of CORU,
25 "The Corporation" and Anna Marie Rivas Stack, "The
26 Sovereign Living Constitutional woman".

12:05

27 CHAIRPERSON: Is that within the core book?

28 MR. E. O'SULLIVAN: It's not. So there is the core
29 book, there is the booklet of correspondence and then

1 there is a separate - it's what purports to be the
2 affidavit with exhibits.

3 CHAIRPERSON: Yeah.

4 MR. E. O'SULLIVAN: And the third exhibit to the
5 affidavit is a witness statement and that begins at
6 page 18 of that PDF.

12:05

7 CHAIRPERSON: Perfect, thank you.

8 MR. E. O'SULLIVAN: And I won't, unless you want me to,
9 read out the introductory things where she describes
10 herself as various things. In the third paragraph, she
11 says:

12:06

12
13 "I refute all allegations of the late [REDACTED] which
14 are vexatious and malicious. While the now deceased
15 complainant may have disagreed with my views, which I
16 have always based in fact, any animosity he held/holds
17 towards me with regard to same must not be deemed a
18 basis for serious allegations of this nature. It is
19 shocking to me that CORU would entertain such unfounded
20 defamatory allegations never-mind facilitate same.

21
22 "It is [REDACTED] right to disagree with me but I say
23 that it is a malicious abuse of the disciplinary
24 process to seek to use personal animosity to defame me
25 and interfere with and threaten my career, my
26 reputation and my right to earn a living. I say that
27 the allegations made by the now 'deceased' complainant
28 [REDACTED] were not made in good faith but in
29 disagreement with my views as expressed in my private

1 life as is my Sovereign Constitutional Right to do so.

2
3 "The points in each one of his complaints are hearsay
4 and biased opinions, which appear to be based on an
5 innate need to destroy me professionally and
6 personally. No factual evidence, picture and proof have
7 been presented to back up these heinous accusations.

8
9 "Furthermore, in my working and private life, I have
10 never and will never cause any prejudice to any member
11 of any community or minority.

12
13 "I have never allowed my private opinion to interfere
14 with my role and support for service users. This
15 includes acting in a manner that in any way causes
16 distress or threatens the health or welfare of any
17 service users or their family members.

18
19 "No complaint has been made against me by any service
20 user, their family member/s, or colleague/s suggesting
21 that I have failed in my duty of care, or in any way
22 endangered or interfered with the high level of care
23 and or treatment/s I provide to service users.

24
25 "No complaint has been made against me by any service
26 user, their family member/s, or colleague/s suggesting
27 that I have failed to respect their rights or dignity.
28 I have always worked and continue to work with honour
29 and integrity for my employers, [REDACTED]

1 [REDACTED] At all times my work was and is
2 conducted with due diligence and care and in the best
3 interests of my clients.
4

5 "I followed all HSE Covid-19 public health measures and
6 advice at all times. All protocols are clearly
7 documented on each patient's file. I at no time, when
8 speaking in private, named the facility I worked at or
9 put service users or their family in harm's way. I at
10 no time had advised service users or their families to
11 go against HSE protocol.
12

13 "I say that the manner of this complaint is slanderous
14 and defamatory. The complainant clearly does not know
15 me, otherwise this statement would not have been made.
16 I am asking the estate of the complainant to retract
17 his false claims and accusations. As a living woman, I,
18 :Anna-Marie: Stack-Rivas, claiming and reserving
19 all-Natural Rights require proof of the following:
20

21 "- That the Sarscov2 or Covid 19 virus exists and has
22 been isolated and positively identified and that the
23 Government has in its possession actual valid science
24 that this virus exists and not computer sequencing.
25

26 "- That the PCR test being used to identify cases of
27 infection with Sarscov2 or Covid 19 is capable of
28 detecting infections in humans of Sarscov2 or Covid 19.
29

1 "- That there exists scientific peer-reviewed proof
2 that the PCR testing procedure currently being used in
3 Ireland, can positively identify Covid19 or SarsCovZ
4 infections and does not mistake any other type of virus
5 or coronavirus, I.E the common cold, or any of the many
6 strains of influenza, as SarsCovZ or Covid 19.

7
8 "- That there exists scientific peer-reviewed evidence
9 that the PCR test is reliable and valid and does not
10 give sufficiently high rates of 'false positives' to
11 render any test results unreliable?

12
13 "- Is it untrue that the UK Government in approx. March
14 2020 downgraded the Claim of SarCovZ or Covid 19
15 pandemic to be no longer HCID (Highly Contagious
16 Infectious Disease) labeling it equivalent to the usual
17 annual common cold or influenza?

18
19 "- That the term "public health threat" being used by
20 the Government to bring in mandates and guidelines can
21 be clearly defined and shown with evidence, that
22 SarsCovZ or Covid 19 is dangerous, highly contagious
23 and life threatening to people without existing severe
24 health problems, and that the alleged threat it poses
25 to the Irish people is real, given that the CDC noted
26 survival rate in March 2021 to be;

27
28 "Age Group Survival Rate
29 0 – 17 99.998%

1 18 – 49 99.95%

2 50 – 64 99.4%

3 65+ 91%

4
5 "- That the alleged highly dangerous infectious disease
6 SarsCovZ or Covid 19 poses more of a threat of danger
7 to the service users and workers of [REDACTED]
8 [REDACTED] than influenza.

9
10 "- Scientific peer reviewed evidence that Masks prevent
11 infections.

12
13 "- Scientific peer reviewed evidence that Masks don't
14 cause oxygen deprivation/Hypercapnia that can lead to
15 many side effects such as headaches, confusion, and
16 dizziness, dyspnea/shortness of breath, dental issues
17 and in more severe cases, syncope, seizures and
18 cancers.

19
20 "- Evidence that breathing in your own CO2 do not cause
21 bacterial infections and respiratory disorders.

22
23 "- Evidence that Mask wearing does not cause existing
24 respiratory and/or cardiac conditions to be
25 exacerbated.

26
27 "- Evidence that wearing masks do not cause stress and
28 anxiety.

1 "- Evidence that mask wearing does not cause speech
2 delay in neuro-typical child development.

3
4 "- Evidence that wearing masks prevented the spread of
5 Spanish Flu.

6
7 "- Evidence to back the claim that there are no aborted
8 fetal cell lines in all childhood vaccines.

9
10 "- Evidence to back the claim that there are no aborted
11 fetal cell lines in the Covid vaccines.

12
13 "- What is MRC-5?

14
15 "- What is WI-38?

16
17 "- What is HEK- 293?

18
19 "- Do any vaccines contain Human and animal DNA such as
20 bovine, monkey, swine, and avian?

21
22 "- What is the USVICP?

23
24 "- What is SV40?

25
26 "- What is MTHFR?

27
28 "- What is the acceptable amount of Aluminum to ingest
29 per day and how much is injected in each childhood

1 vaccine particularly MMR, DTAP and HPV vaccine?

2
3 "- The US vaccine injury compensation program (VICP)
4 has paid out over 70 million in damages for HPV vaccine
5 induced injuries and deaths. Is this correct?

6
7 "- Do you know Regret.ie?

8
9 "- What is Glyphosate and is it in vaccines?

10
11 "- What is the difference between natural formaldehyde
12 and synthetic? Which one is used in vaccines?

13
14 "- Can you provide a study showing vaccinated versus
15 unvaccinated health outcomes in children and/or adults?

16
17 "- Can you show me a safety study proving it is safe to
18 inject multiple vaccines at the same time?

19
20 "- How has the HSE vaccine schedule changed since 1986?

21
22 "- How many doses of vaccines are in the HSE schedule
23 between birth and age 18 years?

24
25 "- Who is Stanley Plotkins?

26
27 "- What were the admissions of Stanley Plotkins video
28 deposition under oath in January 2018?

1 "- I require evidence that I, :Anna-Marie :Stack-Rivas
2 am a bigot, homophobe and/or racist as per the late
3 ██████████ allegations.

4
5 "- Show me evidence that I, :Anna-Marie: Stack-Rivas is
6 a Conspiracy theorist, a term used in a defamatory and
7 derogatory manner as claimed by the late ██████████

8
9 "- a Show evidence of I, :Anna-Marie: Stack-Rivas's,
10 failure to act in the best interests of service users
11 by ignoring public health guidelines such as;

12
13 "1. Failure to a wear a mask and social distance at
14 work.

15
16 "2. Failure to maintain high standards of public
17 conduct and behavior;

18
19 "a) By advising members of the public to stop wearing
20 masks on Bedford Row, Limerick on 19/12/20 that was
21 outside my constitutional rights to freedom of speech
22 in my private capacity.

23
24 b) Advice expressed in Bedford Row, Limerick on
25 19/12/20 was not in fact factual scientific
26 evidence-based advice.

27
28 "c) Stating scientific fact and advising members of the
29 public on Bedford row July 31st 2021.

1 "d) By explaining to members of the public what
2 informed consent is and its importance in making an
3 informed choice at a protest in Limerick in February
4 2022.

5
6 "e) Personal opinion and views given at a gathering
7 outside UHL in July 24 2022

8
9 "f) Not using social media responsibly by spreading
10 medical misinformation and conspiracy theories about
11 Covid-19 and vaccines.

12
13 "- I require evidence that Government 'guidelines' were
14 lawfully binding and are not simply optional guidelines
15 requiring consent.

16
17 "- Show me a lawfully binding contract signed by: Anna
18 Marie : Stack Rivas: Wherein compliance with said
19 guidelines is clearly stated.

20
21 "- I require evidence that I have broken any law as
22 alleged by the late [REDACTED] below;

23
24 "a. Non observance of laws regarding travel during
25 lockdown as seen by her attendance at demonstrations in
26 Limerick, Cork and Dublin, that the assembly attendance
27 was not within my constitutional rights to freedom of
28 travel and movement and or right to peacefully protest.

1 "b. Acting unlawfully or illegally by assembly
2 attendance listed above.

3
4 "- I require evidence that publicly speaking on any of
5 the topic I mentioned such as immunology, epidemiology,
6 and virology, were not factually based and backed in
7 scientific research?

8
9 "- I require evidence;

10
11 "a) That the covid- 19 vaccine is 'safe and effective'
12 as stated by [REDACTED] in her testimony
13 and report with relation to C245."

14
15 That was the first complaint dealt with by the Fitness
16 to Practise Committee previously or Professional
17 Conduct Committee previously.

12:15

18
19 "b) That the covid 19 vaccines have not contributed to
20 many deaths during testing and then post rollout in
21 January 2021.

22
23 "c) That rebuts the fact that from December 2020
24 through November 28, 2025, there have been 1,671,991
25 adverse events reported to the Vaccine Adverse Events.
26 Reporting System in the United States of America for
27 the COVID-19 vaccines, including 38,913 deaths.

28
29 "d) That Viruses in general have been isolated.

1 "I require evidence that I, :Anna Marie: Stack Rivas
2 allegedly;

3
4 "c. Failed to assess health, safety and welfare risks
5 by her refusal to wear a mask at work.

6
7 "d. Failed to demonstrate ethical awareness by
8 spreading medical misinformation and conspiracy.

9
10 "e. Failed to respect the rights and dignity of service
11 users by not observing medical guidelines which could
12 spread infection of Covid-19.

13
14 "- I require evidence that proves the Irish Republican
15 Brotherhood to be a quasi-military council."

16
17 And then under "Conclusion", she says:

18
19 "These cases are about my private life, my private
20 opinions and beliefs. At no time have the actions of my
21 private life crossed over to my professional working
22 life, nor have there been any hurt or injury caused
23 because of my private beliefs or actions at work. My
24 private life is separate from my work life.
25 Furthermore, under Article 1, 2, 6, 8 and 9 of the 1919
26 Sovereign Constitution of Éire, it's my right as a
27 living woman to think and speak freely and attend
28 assemblies if warranted.

1 "I reject all claims and allegations that have been
2 brought against me. I love my job and I worked very
3 hard, against the odds, to get to where I am today. For
4 my career and reputation to be threatened, due to false
5 and spurious claims and allegations, it is devastating
6 for me and my family. I love and respect the people I
7 have the pleasure of serving. I would never put them in
8 danger, nor abuse their trust and faith in me.

9
10 "The original complaint and subsequent allegations
11 thereafter set out that I was putting service users and
12 the public in harm's way. No evidence has been
13 presented to support these allegations. The now
14 deceased complainant has proceeded to defame me and
15 slander my character in their perceived bias regarding
16 what they presume I am, the specific allegation of
17 disregard for women, the LGBT community and foreigners,
18 is false. I am require these allegations to be
19 retracted by the estate of the now deceased complainant
20 immediately. The points in all the allegations are
21 hearsay and biased opinions, based on no evidence but
22 on an apparent wish to destroy me professionally and
23 personally. Furthermore, I respect my fellow colleagues
24 and have always followed protocol while at work. My
25 good standing has been verified by my former line
26 manager's testimonies during the first inquiry for
27 C245. I welcome this opportunity to defend myself from
28 allegations that have been made against my good name
29 and professional integrity."

1 So I would suggest to you that you can see there that
2 Ms. Stack Rivas is not in any sense backing down from
3 the comments that have been made by her previously.
4 What she is saying is there is a distinction to be
5 drawn between my professional life and my personal
6 life, I have the right to freedom of expression, and I
7 have not acted in a manner contrary to the Code of
8 Conduct in speaking as I did at these events, this
9 occurred outside work.

12:19

10
11 That, in a nutshell, as I interpret it at least, is the
12 position she is adopting and that's very much
13 consistent with the position that was adopted at the
14 first Inquiry, and I will address you in much greater
15 detail in relation to all that when I am closing the
16 case but what I would say is this:

12:19

17
18 Of course people are entitled to hold opinions,
19 including opinions that might be considered fringe or
20 outside the mainstream. People do also have a right to
21 freedom of expression. But it's a qualified right.
22 Our ability to express ourselves freely is
23 circumscribed in a whole manner of respects for the
24 greater good. So the law of defamation, for instance,
25 is a means by which one's entitlement to express
26 themselves can result in penalty, if you like, or
27 certainly condemnation and some form of sanction in the
28 form of payment of damages. There are criminal
29 offences relating to the use of speech in certain

12:19

12:19

12:20

1 contexts, including hate speech.

2
3 So to suggest that one has an unfettered and
4 unqualified right to express themselves as they see fit
5 is absolutely incorrect. And to the extent that 12:20
6 Ms. Stack Rivas thinks that she can express herself as
7 she sees fit and to the extent that she has a
8 libertarian view about these things, she is simply
9 incorrect.

10
11 That then brings me to the issue of the distinction
12 between personal her life and her professional life and
13 undoubtedly she has greater scope to discuss whatever
14 private opinions and beliefs that she might have in her
15 private life than she does in her professional life. 12:21

16 But just because the comments that she made as
17 reflected in the three Notices of Inquiry were not made
18 while she was at work does not mean that the issues of
19 concern that arise do not relate to her registration
20 and her fitness to practise her chosen profession, 12:21
21 because you will see when you look at the videos, when
22 you consider the transcripts and when you consider the
23 allegations, that all of the allegations are based upon
24 comments she made in the course of which she described
25 herself variously as a healthcare worker, 12:21
26 physiotherapist, and/or a HSE employee. So she chose
27 to invoke her profession. She chose to describe
28 herself as a healthcare worker, as a physiotherapist,
29 as a HSE employee.

1 One would surmise that she did so in an effort to seek
2 to lend legitimacy to the views that she was
3 expressing, to lend credence to what she was saying, to
4 add heft to the opinions she was expressing - I'm not a
5 mere member of society, I am a healthcare worker, I am 12:22
6 a physiotherapist, I am a HSE employee. And by doing
7 that, by herself putting her professional opinion,
8 described variously as healthcare worker,
9 physiotherapist, HSE employee, out there, while in the
10 same breath expressing the views that she did, she is 12:22
11 the person who has brought this from the purely private
12 into the professional sphere. And for the reasons
13 you'll hear about in due course when the expert gives
14 evidence, the evidence of the CEO or Registrar will be
15 that in so doing, that she has been guilty of 12:23
16 professional misconduct in expressing the views that
17 she has expressed, no matter how genuinely held those
18 beliefs, even if they are misguided maybe.

19
20 In terms of the evidence, Chair, what I was going to 12:23
21 suggest is - I have mentioned that there are
22 transcripts that have been prepared of the videos that
23 you are going to see and so that the stenographers who
24 prepared those transcripts don't have to detain
25 themselves here for too long, I was going to ask to 12:23
26 call them first simply to prove those transcripts.

27
28 We are going to have to show you the videos at some
29 point and I'm very much in your hands as to when you

1 want to do that. You may prefer to do that earlier on
2 in the process rather than later on so that you have
3 had a chance to consider that material.
4

5 I intend to call witnesses to prove all of the material 12:23
6 in the core book, including to prove registration given
7 that Ms. Stack Rivas isn't here. So there will be a
8 lot of witnesses being called to prove documentation
9 and to prove technical matters, if you like, and that
10 will take the greater part of today, I anticipate. 12:24
11

12 Tomorrow, you're going to hear from [REDACTED]
13 [REDACTED] who was a member of NPHEt, and is going to give
14 evidence in relation to the Covid pandemic and the
15 steps that were taken by NPHEt among other State 12:24
16 agencies to address the public health concerns that
17 arose and to address some of the commentary made around
18 the vaccines and so on by Ms. Stack Rivas.
19

20 And then finally you are going to hear expert evidence 12:24
21 from [REDACTED] who is a physiotherapist, who is
22 giving evidence on behalf of the Registrar.
23

24 So, as I say, I would like to call the two
25 stenographers so that they don't have to stay here for 12:24
26 the day and after that I am very much in your hands as
27 to whether you would like at that stage to see the
28 videos and then to go through the witnesses proving
29 registration, proving the PPC file, etc., or whether

1 you would prefer to run through what I might call the
2 technical evidence and then view the videos. And you
3 may want to think about that over lunch.
4 CHAIRPERSON: I think it's an appropriate course that
5 the evidence from the stenographers can be heard now 12:25
6 and if you called them, we will do it and at that point
7 we will review what further witnesses that we may hear
8 before lunch, if any. Thank you.
9 MR. E. O'SULLIVAN: Perfect. So the first witness,
10 please, is - sorry, I can formally open all of the 12:25
11 Notices of Inquiry if you'd like but I think you've
12 probably got a decent flavour of what the allegations
13 are?
14 CHAIRPERSON: We're happy that the Notice of Inquiry
15 has been opened to us and we will proceed to hear the 12:26
16 evidence from the two stenographers.
17 MR. E. O'SULLIVAN: Thank you very much, Chair. So the
18 first witness is [REDACTED] please.
19
20 [REDACTED] HAVING BEEN SWORN, WAS EXAMINED BY 12:26
21 MR. E. O'SULLIVAN, AS FOLLOWS
22
23 MR. E. O'SULLIVAN: Good afternoon, [REDACTED]
24 A. Good afternoon.
25 Q. You are a stenographer by profession, I think, and you 12:28
26 work for [REDACTED] is that
27 right?
28 A. Yes.
29 1 Q. How long have you been working there for,

1 approximately?
2 A. Over 20 years.
3 2 Q. I see. I think you were asked by Fieldfisher on behalf
4 of the Registrar of CORU to prepare a transcript in
5 relation to certain video files that were sent to you, 12:29
6 is that right?
7 A. Yes.
8 3 Q. And for the members of the Committee - and I don't know
9 if you have a core book in front of you - but if we
10 could just turn to page 119, please? 12:29
11 A. Of 1 or 2?
12 4 Q. 1, I suspect. We are just working from soft copies, so
13 let me just get the tab for you.
14 A. Yes.
15 5 Q. So it is 4D for you. 12:29
16 A. Allegation C366?
17 6 Q. Yes. So do you have there a document beginning:
18
19 "STRICTLY PRIVATE AND CONFIDENTIAL
20 TRANSCRIBED VIDEO AUDIO, ALLEGATION 1 (C366) 12:29
21 RE ANNA MARIE RIVAS STACK
22 SATURDAY, 5TH FEBRUARY 2022."
23
24 A. Yes.
25 7 Q. Yes, and do you recognise that? 12:29
26 A. Yes.
27 8 Q. Yes. Who prepared this particular transcript?
28 A. I did.
29 9 Q. And have you had an opportunity to satisfy yourself

1 that insofar as possible and to the best of your
2 ability, it is an accurate transcript of the video that
3 was sent to you?

4 A. Yes.

5 10 Q. And, Chair, for ease of reference for all concerned, 12:30
6 that is the transcript the subject of allegation no. 1
7 in the first Notice of Inquiry.

8

9 If we could then move on, please, to page 132.

10 A. Allegation 2, C366? 12:30

11 11 Q. Yes. Do you recognise that?

12 A. Yes.

13 12 Q. And what's that?

14 A. It's a video/audio I transcribed.

15 13 Q. Yes, and we see there is a reference in the first page 12:30
16 to an event on Tuesday, 24th July 2022 and we see at
17 the top of the page, above "Unknown Speaker" it says:
18

19 "TRANSCRIBED VIDEO AUDIO, ALLEGATION 2 (C366), ON
20 TUESDAY, 24TH JULY 2022, AS FOLLOWS". 12:30

21

22 A. Yes.

23 14 Q. And then the body of it. And again, you prepared that
24 transcript you said?

25 A. I did, yes. 12:31

26 15 Q. And to the best of your ability, is that an accurate
27 transcript of what was said on the video?

28 A. Yes.

29 16 Q. And, Chair, as is reflected there, that is the subject

1 of Allegation 2 in the first Notice of Inquiry.
2
3 If we could then move on, please, to page 215.
4 CHAIRPERSON: 215?
5 MR. E. O'SULLIVAN: 215. 12:31
6 17 Q. Do you have that?
7 A. I do, yes.
8 18 Q. And so that is, again it's the cover page I hope of a
9 transcript and it is described as:
10 12:31
11 "TRANSCRIBED VIDEO AUDIO, ALLEGATION 1 (C408), ON
12 SATURDAY, 31ST JULY 2022".
13
14 Do you recognise that?
15 A. I do, yes. 12:31
16 19 Q. And who prepared this transcript?
17 A. I did.
18 20 Q. I see. And again, can I ask you, as I have before,
19 again insofar as possible are you satisfied that that
20 is an accurate transcription of what was said on the 12:32
21 video concerned?
22 A. I am, yes.
23 21 Q. And before I move on, can I just ask you about the
24 process you used in order to transcribe what was said
25 on the video, do you remember how you did it? 12:32
26 A. Yeah, this particular one, I think she was at a rally
27 and she was...(INTERJECTION).
28 22 Q. Just in terms of how you went about preparing the
29 transcript?

1 A. Oh, I just listened and I transcribed, as [REDACTED] is
2 doing.

3 23 Q. And that is the subject of the second Notice of
4 Inquiry. This is one allegation in that Notice of
5 Inquiry, Chair. Then if we move on to page 307, I hope 12:32
6 you have there again the cover page of a transcript
7 prepared by [REDACTED] and it is
8 described as :
9

10 "TRANSCRIBED PODCAST - THE PLUMLEY POD 12:33
11 EP. 69 ANNA MARIE STACK RIVAS
12 ALLEGATION 1 (C489) MARCH 2024"
13

14 A. Yeah.

15 24 Q. Do you recognise that? 12:33

16 A. I do, yes.

17 25 Q. Yes. Who prepared that transcript?

18 A. I did.

19 26 Q. And again, can I ask you insofar as possible is that an
20 accurate transcript of the material that was provided 12:33
21 to you?

22 A. Yes.

23 27 Q. And that's the subject of Allegation 1 in the third
24 Notice of Inquiry...(INTERJECTION)
25 CHAIRPERSON: Allegation 1 in? 12:33
26 MR. E. O'SULLIVAN: The third Notice of Inquiry. And
27 then page 354, please. Do you have that?

28 A. Yes.

29 28 Q. We see the cover page there again is a [REDACTED]

1 [REDACTED] document and it is described as:
2
3 "TRANSCRIBED VIDEO RECORDING ALLEGATION 2 (C489)
4 RE ANNA MARIE STACK RIVAS
5 DECEMBER 2023"
6
7 Do you recognise that?
8 A. I do.
9 29 Q. And who prepared this transcript?
10 A. I did. 12:34
11 30 Q. And again insofar as possible, are you satisfied that's
12 an accurate transcription of the material that was
13 provided to you?
14 A. Yes.
15 MR. E. O'SULLIVAN: And, Chair, that's the subject of 12:34
16 Allegation 2 in the third Notice of Inquiry. They are
17 all my questions, Chair. Thank you very much. Thank
18 you, [REDACTED] The members of the Committee may
19 have questions for you.
20 CHAIRPERSON: Any questions? No. 12:35
21 MR. J. O'SULLIVAN: No.
22 CHAIRPERSON: I don't have any questions either. Any
23 questions from the legal assessor?
24 MR. HOGAN: No.
25 CHAIRPERSON: Thank you very much for attending with 12:35
26 you evidence today.
27 MR. E. O'SULLIVAN: Thank you, Chair. The next witness
28 is [REDACTED]
29

1 ████████████████████ HAVING AFFIRMED, WAS EXAMINED
2 BY MR. E. O'SULLIVAN, AS FOLLOWS:

3
4 MR. E. O'SULLIVAN: Good afternoon, ██████████ You
5 are usually in the other chair! 12:36

6 A. Yes.

7 31 Q. You are a stenographer by profession and I think you
8 work with ██, is that
9 right?

10 A. Yes, that's correct. 12:36

11 32 Q. How long have you been working there, approximately?

12 A. 2002, I started.

13 33 Q. And have you been working as a stenographer since then?

14 A. Yes.

15 34 Q. I think you were asked to attend at a meeting of the 12:36
16 Council of CORU on the 9th April 2021 - it was a remote
17 meeting - to prepare a transcript in relation to what
18 was said at that meeting, is that correct?

19 A. Yes, that's correct.

20 35 Q. And if the members of the Committee turn to page 364 - 12:37
21 do you have that?

22 A. I have it here in front of me, yes.

23 36 Q. Yes, do you recognise that document?

24 A. Yes, I do.

25 37 Q. And what is it? 12:37

26 A. It's a transcript that I prepared of a Council meeting.

27 38 Q. And insofar as possible, are you satisfied that that is
28 an accurate transcription of what was said at the
29 meeting?

1 A. Yes.

2 MR. E. O'SULLIVAN: They are my questions,

3 [REDACTED] thanks you very much. The members of the

4 Committee may have questions for you.

5 CHAIRPERSON: There are no questions from the Committee 12:37

6 for you. And I don't have any questions either. Thank

7 you very much for attending.

8 [REDACTED] Thank you, thanks.

9 MR. E. O'SULLIVAN: So, Chair, at this stage I suppose

10 you could take your lunch now, if you would like and 12:38

11 you can consider how you would like the rest of the

12 afternoon to proceed. Alternatively, I could call a

13 witness to deal with the PPC documentation effectively

14 receipt of the complaint...(INTERJECTION).

15 CHAIRPERSON: I think you indicated Mr. O'Sullivan that 12:38

16 you had some technical matters to attend to, such as

17 proving registration, etc.

18 MR. E. O'SULLIVAN: Yes.

19 CHAIRPERSON: Do you wish to call those - I'm conscious

20 it's twenty to one. If you have a number of short 12:38

21 witnesses, we are perfectly happy to hear those.

22 MR. E. O'SULLIVAN: Perfect. Or we could play the

23 videos for you. I'm very much in your hands.

24 CHAIRPERSON: I think if we heard the technical

25 witnesses that you are referencing, it might be best. 12:38

26 MR. E. O'SULLIVAN: Perfect. So the next witness then

27 is [REDACTED] My Irish is not what

28 it should be, not what it once was! That's the surname

29 [REDACTED] and then [REDACTED]

1 [REDACTED] Chair, just to advise he will be another
2 minute. My colleague is upstairs on the other floor,
3 so he is just on his way down.
4 CHAIRPERSON: That's perfect. Thank you very much.
5 [Short pause]. Perhaps, Mr. O'Sullivan, you might be 12:41
6 so kind as to inform the support staff as to the other
7 witnesses you intend calling before lunch so that they
8 might be in a position to attend when they are called
9 please.
10 MR. E. O'SULLIVAN: Thank you. 12:41
11
12 [REDACTED] HAVING BEEN SWORN,
13 WAS EXAMINED BY MR. E. O'SULLIVAN, AS FOLLOWS
14
15 MR. E. O'SULLIVAN: Good afternoon. 12:42
16 A. Good afternoon.
17 39 Q. I think you are a case officer or certainly were a case
18 officer working with the PPC in 2023 and 2024, is that
19 right?
20 A. That's correct. 12:42
21 40 Q. Would you mind - I'm sure the members of the Committee
22 will be very familiar with the work done by case
23 officers, but would you mind giving just a very brief
24 outline to the Committee as to what the role performed
25 by case officers for the PPC is? 12:42
26 A. Case officers assist the Preliminary Proceedings
27 Committee in their examination of complaints at the
28 initial screening stage of the complaint process.
29 41 Q. There's just some documents I want to ask you about

1 then. So if we can turn please to page 24 of the book.
2 Now, you have two folders, so it will be folder number
3 1, page 24 for the Committee.

4 A. I have it.

5 42 Q. And we see the first page is a table of contents and 12:43
6 the reference is "C366 PPC Meeting Brief 16/4/24". Do
7 you recognise what this document is?

8 A. Yes, this is the PPC brief of the Complaint 366. These
9 are the papers that would have been before the
10 Committee when it considered this complaint. 12:43

11 43 Q. And who was that complaint about, Complaint 366?

12 A. This complaint was made by a gentleman called [REDACTED]
13 [REDACTED] against a physiotherapist registrant by the name
14 Anna Marie Rivas Stack.

15 44 Q. I see. And we see the table of contents runs from page 12:43
16 3 down to page 91 and it comprises variously
17 correspondence between CORU and the Registrant, CORU
18 and the complainant and other documents provided to the
19 PPC, is that a fair summary?

20 A. That's correct, yes. 12:44

21 45 Q. And just to highlight a few of the documents, beginning
22 at page number 3, which is page 26 of the core book,
23 there is a case report which you prepared on the 23rd
24 February 2024. Could I ask you to explain for the
25 Committee what a case report is and how the case 12:44
26 officer comes to prepare a case report?

27 A. The case officer prepares the case report to assist the
28 Committee. It sits out a chronology of all the steps
29 taken by the case officer, all the important

1 correspondence received or sent. It doesn't contain
2 every single bit of correspondence but all the major
3 work undertaken on the complaint. It also includes
4 suggested directions for the Committee. It doesn't
5 have to include those. It also includes a list of all 12:44
6 the documentation that makes up the complaint file as
7 well. And a copy of this is sent to the Registrant
8 concerned so they can see exactly what documentation is
9 going to be before the Committee, and they can also see
10 any suggested directions from the case officer as well. 12:45

11 46 Q. Again, I'm not going to take you through all of this
12 particular case file, but if you turn to page 30,
13 please, there is an e-mail from [REDACTED] of 23rd
14 June 2023?

15 A. Yes. 12:45

16 47 Q. Is that, in effect, his e-mail making the complaint to
17 CORU?

18 A. Yes, this is the first e-mail we received from him with
19 this complaint form. You will see it says - under
20 "Attachments" there, it has the Fitness to Practise 12:45
21 Complaint Form - that's the title he used on his file
22 that he sent in, and also a few other files that he
23 attached as well.

24 48 Q. I think included amongst the attachments were a number
25 of media files, if you like, the reference to Rumble 12:45
26 and to Odysee?

27 A. Yes. They're mostly images.

28 49 Q. And do you recall being provided with videos - links,
29 in effect, links to files by [REDACTED]

1 A. He did, yes.

2 50 Q. And I think would it ordinarily be the case that upon
3 receipt of complaint, the case officer would write out
4 to the Registrant to notify them of the complaint? Is
5 that how the process works? 12:46

6 A. That's true, yes. Once we start to process the
7 complaint - there may be correspondence with the
8 complainant just to sort out a few matters first, but
9 once we have the valid complaint, we would then provide
10 all the documentation, all the complaint to the 12:46
11 Registrant for their comment and their chance to
12 respond.

13 51 Q. If you could turn to page 65, please, I hope you see a
14 letter of 5th September 2023, which is authored by you
15 and is addressed to Ms. Stack Rivas, notifying her that 12:46
16 a complaint that had been received, enclosing a copy,
17 and asking that if she wants to provide a response, she
18 should do so by the 19th September 2024. And would all
19 of the material that had been provided by the
20 complainant have been provided at that stage to 12:46
21 Ms. Stack Rivas?

22 A. It would, yes, yes. In accordance with fair procedure,
23 the Registrant gets to see all the correspondence and
24 all the material as well.

25 52 Q. I think over the page at page 66, we see that you 12:47
26 received a response by e-mail on 7th September 2023
27 from Fórsa on behalf of Ms. Stack Rivas, and that
28 response is over the page beginning at page 67, is that
29 right?

1 A. That's correct, yes.

2 53 Q. And further correspondence was exchanged and,
3 ultimately, if you turn to page 115, please, do you
4 have there a minute of the meeting of the Preliminary
5 Proceedings Committee of the 16th April 2024? 12:47

6 A. I do, indeed, yes. That's the extract from the minute
7 for this case.

8 54 Q. And we see over the page, page 116, that in relation to
9 complaint C366, you presented the complaint to the
10 Committee. The Committee considered the legislation 12:48
11 etc. and formed the opinion that there was sufficient
12 cause to warrant the matter being referred forward.
13 That was the decision of the PPC in relation to that
14 specific complaint?

15 A. That was the PPC's opinion on that complaint, yes. 12:48

16 55 Q. Have you had an opportunity to look at that complaint
17 file, that PPC file, and satisfy yourself that that is
18 the complaint file held by CORU in relation to this
19 particular complaint insofar as the PPC side of things
20 is concerned? 12:48

21 A. Yes, that's correct, yes.

22 56 Q. Thank you. And if I could then ask you, please, to
23 turn to page 139 and the heading here is "C408 PPC
24 Meeting Brief 16/4/2024". What does this bundle of
25 documents relate to? 12:48

26 A. This relates to another complaint that we received from
27 [REDACTED] also about a physiotherapist, Ms. Anna
28 Marie Stack Rivas as well.

29 57 Q. And again we see in the index of the Table of Contents

1 that there is a case report, there is correspondence
2 enclosed, and there is certain other documentation
3 enclosed. Have you had an opportunity to satisfy
4 yourself that that is the PPC file in relation to that
5 particular complaint? 12:49

6 A. Yes, these are the papers that were before the PPC when
7 they considered this complaint on that date on the 16th
8 April.

9 58 Q. Again we see it begins on page 141 with a case report
10 which you prepared? 12:49

11 A. That's correct, yes.

12 59 Q. At page 145, there is an e-mail from [REDACTED] - again
13 it's the same complainant - of 24th October 2023?

14 A. That's correct, yes.

15 60 Q. And there's a link provided there. Was further 12:49
16 material provided in terms of videos and so on by
17 [REDACTED] in relation to this complaint?

18 A. [REDACTED] provided some material, and he also provided
19 links in his e-mail and in his complaint form as well,
20 digital links. 12:50

21 61 Q. And the complaint form begins at page 146?

22 A. Yes.

23 62 Q. And if I could just ask you, please, to turn to page
24 156, there is a screenshot from Facebook there. I hope
25 you can see that, can you? 12:50

26 A. I can, yes.

27 63 Q. And there's a video and, under it, it says "Protest
28 against restrictions in Limerick - July 31 2021". Was
29 that something enclosed by [REDACTED] with the

1 complaint?

2 A. Yes.

3 64 Q. And if I could next ask you to move to page 169, do you
4 have an e-mail of the 27th October 2023 from you to
5 Ms. Stack Rivas attaching a letter, a brief of 12:51
6 documentation and explanatory information about the
7 complaint process?

8 A. That's correct, yes.

9 65 Q. And your letter, I think, is over the next page, is
10 that right, page 170? 12:51

11 A. It is, this is the initial letter that we send - we
12 would send out when we receive a complaint to notify
13 the Registrant of the complaint and the steps we would
14 be taking.

15 66 Q. And, as with the first complaint, I had asked you was 12:51
16 Ms. Stack Rivas provided with all of the material that
17 [REDACTED] had provided in order to allow her to
18 respond to the complaint?

19 A. She was, yes.

20 67 Q. I think you received correspondence in relation to this 12:51
21 complaint from Hayes McGrath Solicitors and, if you'd
22 turn to page 177, there is a letter of the 16th
23 November 2023; do you have that?

24 A. Yeah.

25 68 Q. And Hayes McGrath raised in this correspondence what 12:52
26 they described as the repeated complaints being made by
27 [REDACTED] and they suggested that this particular
28 complaint, C408, was vexatious and/or made in bad
29 faith?

1 A. That's correct.

2 69 Q. Do you remember that being an issue raised on behalf of
3 Ms. Stack Rivas?

4 A. It was.

5 70 Q. I think there is a further letter then from Hayes 12:52
6 McGrath at page 194?

7 A. Yes.

8 71 Q. And, again, that's an issue that is revisited and Hayes
9 McGrath set out the position of Ms. Stack Rivas. The
10 PPC met to consider the matter and we see the minute 12:52
11 beginning at page 211, is that right?

12 A. That's correct, yes, that's the minute, that's right.

13 72 Q. What is the process, if indeed there is a process, at
14 PPP stage, where a registrant maintains that a
15 complaint is frivolous or vexation or that the issues 12:53
16 raised have already been dealt with, or arguments like
17 that?

18 A. If we receive a complaint and it appears that the
19 complaint may be going over the same issues or concerns
20 that were raised in a previous complaint, or if the 12:53
21 Registrant raises an issue, as in this case, that they
22 believe it's oppressive or it's a repeat complaint, we
23 do give the Registrant and the complainant an
24 opportunity to comment on various factors that the PPC
25 may consider. The PPC under the legislation - I think 12:53
26 53(6) - has to consider whether or not a complaint is
27 trivial, vexatious, an abuse of process for every
28 complaint. Sometimes, it will examine a complaint in
29 great detail to see if this is the case, and we give

1 all the parties an opportunity to provide their views
2 on this so that the information is there for the PPC
3 when it comes to consider that section.

4 73 Q. Thank you. And we see the minute at page 211 of the
5 16th April in relation to this particular complaint, 12:54
6 C408. Again, you present the complaint to the
7 Committee and that can be seen at page 212, and the
8 Committee decided, having considered everything, that
9 there was sufficient cause to warrant the referral
10 forward of the complaint to this Committee on the 12:54
11 grounds of professional misconduct, is that right?

12 A. That's correct, yes.

13 74 Q. And then, thirdly, if I could ask you to turn to page
14 226, please, do you see a document there entitled "C489
15 PPC Meeting Brief to 08.07.2025" with the table of 12:55
16 contents?

17 A. Yes.

18 75 Q. And again could I ask you for completeness what that
19 is, that bundle of documents?

20 A. This is the meeting brief, all the papers that were 12:55
21 before the Preliminary Proceedings Committee when it
22 considered complaint C489 on the 8th July 2025.

23 76 Q. Again, have you been able to satisfy yourself that this
24 is the material that was provided to the PPC when it
25 was making its decision in relation to this particular 12:55
26 complaint?

27 A. It is, indeed.

28 77 Q. And again I won't take you through all of the material,
29 but at page 227 again we have your case plan, I think?

1 A. That's correct, yes.

2 78 Q. The e-mail received from [REDACTED] is at page 228.
3 It's dated 5th September 2024?

4 A. That's correct, yes.

5 79 Q. And we can see there are a number of different links 12:55
6 provided?

7 A. That's correct.

8 80 Q. ...together with some attachments. There is an
9 attachment, I think, at page 230, 231 and 232 relating
10 to a body described as the Irish Republican 12:56
11 Brotherhood?

12 A. That's correct.

13 81 Q. And then the complaint form itself begins at page 233,
14 is that right?

15 A. That's correct. 12:56

16 82 Q. Could I ask you to turn to page 285 initially, please?
17 There is a file note there of a telephone call you
18 received, is that right?

19 A. That's correct, this is a note of a telephone call I
20 received from a member of the public. 12:56

21 83 Q. And you were made aware that [REDACTED] had passed
22 away, is that right?

23 A. That's correct, yes.

24 84 Q. And what steps, if any, were taken in relation to the
25 complaint after that? Again, is there a procedure that 12:57
26 arises if a complainant has died or how was that dealt
27 with in that instance?

28 A. We don't have a procedure - or we didn't at that time.
29 Advice was taken that - or the complaint was considered

1 and it was decided that we would proceed with the
2 complaint, that an issue of public concern had been
3 raised and that it was appropriate...(INTERJECTION).
4 CHAIRPERSON: Could I ask you to raise your voice a
5 little because we're finding it hard to hear you? 12:57
6 A. Oh, sorry, Chair. It was decided at the time to
7 continue with the complaint, that an issue of public
8 importance had been raised and that, as we had started
9 to process the complaint, it would have to be brought
10 before the Preliminary Proceedings Committee for them 12:57
11 to direct or to form an opinion.
12 85 Q. MR. E. O'SULLIVAN: Thank you. And at page 289, there
13 is a letter of the 10th January 2025 to Ms. Stack
14 Rivas?
15 A. That's correct. 12:57
16 86 Q. And she is notified of the complaint. Again, was she
17 provided with all of the material
18 that...(INTERJECTION).
19 A. She was, she was provided with copies of everything.
20 87 Q. At page 296, I think the Committee will see her 12:58
21 response to the complaint?
22 A. That's correct.
23 88 Q. And at page 303 is the decision of the - the minute of
24 the decision of the PPC, is that right?
25 A. That's correct. 12:58
26 89 Q. And we see it's dated 8th July 2025. Do you have a
27 recollection of a previous decision of the PPC being
28 made in relation to this complaint that ultimately had
29 to be revisited?

1 A. Yes.

2 90 Q. Do you remember what occurred that led to the matter
3 coming back before the PPC?

4 A. There was a query over the appointment, whether the
5 appointment of a PPC member had lapsed, one of the PPC 12:58
6 members who had actually sat on the meeting. So it was
7 considered adjourned and it came back for a fresh
8 hearing in front of the Committee, a fresh make up of
9 fresh personnel.

10 91 Q. And on the 8th July 2025, we see from this minute that 12:59
11 you presented the complaint to the Committee. And
12 again we see that the Committee decided to refer the
13 matter forward to this Committee?

14 A. That's correct, yes.

15 MR. E. O'SULLIVAN: They are my questions. Thank you 12:59
16 very much. As you know, the members of the Committee
17 may have members for you.

18 CHAIRPERSON: We don't have any further questions for
19 you. Thank you very much for your attendance.

20 A. Thank you very much, Chair. 12:59

21 CHAIRPERSON: Mr. O'Sullivan, this might be an
22 appropriate time for us to take a lunch break?

23 MR. E. O'SULLIVAN: Perfect.

24 CHAIRPERSON: We will reconvene at two o'clock.

25 MR. E. O'SULLIVAN: Thank you. 12:59

26 CHAIRPERSON: Thank you.

27

28 THE HEARING THEN ADJOURNED FOR LUNCH

29

1 THE HEARING RESUMED, AS FOLLOWS, AFTER LUNCH

2
3 CHAIRPERSON: Are you in a position to proceed,
4 Mr. O'Sullivan?

5 MR. E. O'SULLIVAN: Yes, thank you, Chair. The next 14:00
6 witness is [REDACTED] please.

7
8 [REDACTED] HAVING AFFIRMED, WAS EXAMINED BY
9 MR. E. O'SULLIVAN, AS FOLLOWS:

10
11 92 Q. MR. E. O'SULLIVAN: Good afternoon, [REDACTED] I 14:01
12 think you are employed by [REDACTED] and you work in the
13 [REDACTED] is that right?

14 A. That's correct, yes.

15 93 Q. And what is your role in the department? 14:02

16 A. I am the operations and project manager.

17 94 Q. Thank you very much. If I could ask you to open - I
18 think it should be folder 1 I hope in the folder in
19 front of you, I may have that wrong, but for the
20 Committee it's page 437. 14:02

21 A. I think it might be folder 2.

22 95 Q. Okay, thanks.

23 A. No...

24 96 Q. In that tab - sorry, I will just let you get it.

25 A. Apologies, it was folder 1. 14:02

26 97 Q. Don't worry.

27 A. Yeah.

28 98 Q. Thank you. Behind that are tab is what's described as
29 a registration file. Are you familiar with what that

1 is?
2 A. Yeah, yes.
3 99 Q. And what is it?
4 A. Well, the first page here is an e-mail that was sent to
5 the HCPC in the UK to confirm the status of the 14:03
6 applicant with the HCPC.
7 100 Q. I see. So does this relate to an application for
8 registration?
9 A. Yes, exactly.
10 101 Q. And who is the applicant? 14:03
11 A. Anna Marie Stack Rivas.
12 102 Q. And do you know was Ms. Stack Rivas's application for
13 registration as a physiotherapist successful?
14 A. It was.
15 103 Q. Do you know when she was registered? 14:03
16 A. Yes. She was registered on 1st October 2018.
17 104 Q. I see. And has she been on the Register ever since?
18 A. Yes.
19 MR. E. O'SULLIVAN: They are all my questions, thank
20 you. The members of the Committee may have questions 14:03
21 for you.
22 CHAIRPERSON: No, we have no questions for you,
23 [REDACTED] thank you very much for your evidence.
24 [REDACTED] okay, thank you very much.
25 MR. E. O'SULLIVAN: The next witness, Chair, is [REDACTED] 14:04
26 [REDACTED] who is a solicitor in [REDACTED] and is going
27 to give evidence in relation to the videos.
28
29

1 [REDACTED] HAVING AFFIRMED, WAS EXAMINED BY
2 MR. E. O'SULLIVAN, AS FOLLOWS:

3
4 MR. O'SULLIVAN: Good afternoon, [REDACTED]

5 A. Good afternoon. 14:04

6 105 Q. I think you are a senior associate in [REDACTED] where
7 you have worked since October of 2015 and you, in
8 recent times, have had carriage of the file in relation
9 to this particular series of complaints against
10 Ms. Stack Rivas? 14:05

11 A. That's correct.

12 106 Q. And in preparing the Inquiry, I think you had reason to
13 download a number of video recordings and other media
14 files from the internet that had been relied upon by
15 [REDACTED] when making his complaints against Ms. Stack 14:05
16 Rivas, is that right?

17 A. That's correct.

18 107 Q. And, Chair, what I propose to do is in the first
19 instance to ask Ms. Unger if she could play, if you
20 have control of the system. 14:05

21 A. I don't, actually but IT does.

22 108 Q. So the link, the video that is
23 [rumble.com/vurfyf-limerick-city-rally-speeches](https://www.rumble.com/vurfyf-limerick-city-rally-speeches), which
24 is the subject of Allegation 1 in the first Notice of
25 Inquiry, if that could be played, please? 14:05

26 A. I believe it's 4C.

27 109 Q. 4C, thank you.

28 [REDACTED] It will just take a second for the screen
29 to play it for us.

1 CHAIRPERSON: Thank you.

2
3 (VIDEO PLAYED)
4

5 MR. O'SULLIVAN: We are just going to try and turn that 14:09
6 down.

7 [REDACTED] Chair, we just don't seem to be able to
8 turn it down from the box there. So maybe if the
9 Committee want to retire for a few minutes and we'll
10 ask IT to get it sorted. Or if you're happy to 14:09
11 continue this way?

12 CHAIRPERSON: We're happy to proceed.

13 [REDACTED] Okay, thank you very much. [Short
14 pause]. Apologies, Chair, we will ask IT to play it
15 again. 14:10

16
17 (VIDEO PLAYED)
18

19 MR. E. O'SULLIVAN: We might try and deal with the
20 volume for... 14:26

21 MR. HOGAN: Can we fix the volume?

22 [REDACTED] Maybe the Committee can retire for a few
23 minutes when we can try and fix this issue? I
24 apologies. I understand it is really loud for
25 everybody. 14:27

26 CHAIRPERSON: You might give us an indication when you
27 are ready to come back out.
28
29

1 THE HEARING ADJOURNED BRIEFLY AND THEN RESUMED, AS
2 FOLLOWS:

3
4 CHAIRPERSON: Are all the technological difficulties
5 resolved, Mr. O'Sullivan? 15:01

6 MR. E. O'SULLIVAN: We hope so.

7 CHAIRPERSON: Are we in a position to proceed?

8 MR. E. O'SULLIVAN: We are.

9 110 Q. [REDACTED] where do did you download that video that we
10 have just seen from? 15:01

11 A. I put the URL from the website into a video downloading
12 platform called savethevideo.net and it downloaded the
13 video and then I added it to Fieldfisher's case
14 management system, which is called Practice Evolve.

15 111 Q. And the URL itself, what website did the video come 15:02
16 from, do you know?

17 A. From Rumble.

18 112 Q. Rumble. And if the members of the Committee turn to
19 page 43 of the core book, we see one of the screenshots
20 provided by [REDACTED] with his first complaint. 15:02

21 CHAIRPERSON: That screenshot is the video we've just
22 watched?

23 MR. E. O'SULLIVAN: Yes, is that right, Ms. Unger?

24 A. Yes.

25 113 Q. And are you in a position to say how many times or can 15:02
26 you tell from the website how many times that video had
27 been viewed?

28 A. I went on to check today and the video is still
29 publicly available. There is an icon underneath the

1 video which looks like a play button and, beside it, it
2 says "348", so I'm taking it that...(INTERJECTION).
3 CHAIRPERSON: 348?
4 A. Yes, I'm taking it that that means it was played 348
5 times. 15:03
6 114 Q. MR. E. O'SULLIVAN: And on what date did you download
7 it using the software you have referred to?
8 A. The 8th December.
9 115 Q. Of?
10 A. Of 2025. 15:03
11 116 Q. Thank you. Now, if I can next ask you about a video
12 "rumble.com/v1dgr1t-andys-conversations-part-2", are
13 you familiar with that video?
14 A. Yes, I viewed it and downloaded it.
15 117 Q. And when did you do that? 15:03
16 A. On the 8th December as well.
17 118 Q. And if we could play that please.
18 CHAIRPERSON: Mr. O'Sullivan, would you so kind as to
19 direct the Committee to the transcript of the video
20 that you are about to open? 15:03
21 MR. E. O'SULLIVAN: Oh absolutely, yes. So the one we
22 have just listened to is at page 199 and the one I am
23 about to play now is at 132.
24 CHAIRPERSON: Thank you very much.
25 MR. E. O'SULLIVAN: So if we could now play the video 15:03
26 at tab 4E.
27
28 (VIDEO PLAYED)
29

1 119 Q. MR. E. O'SULLIVAN: And could I ask the same question
2 as with the last question, [REDACTED] how did you
3 obtain that particular video from the website?
4 A. I went on to the website, Rumble, viewed it, put it
5 into the video downloader, saved the video.net, 15:11
6 downloaded the video and saved it to Practice Evolve on
7 Fieldfisher's case management system.
8 120 Q. And I think if we turn to page 44 of the core book, we
9 will see a screenshot from [REDACTED] with his first
10 complaint that has the URL and that's the same as the 15:11
11 URL you used to obtain the video, is that right?
12 A. Yes, that's correct.
13 121 Q. And could you tell or have you been able to establish
14 from that website how many times this particular video
15 has been viewed? 15:12
16 A. It seems as though the icon with the play button has
17 385 listed beside it, so I'm taking it that it was
18 played 385 times.
19 122 Q. And I think you also had reason to search another URL
20 associated with Rumble and the name of that file was 15:12
21 "Liaising with the Council - James P. Nestor &
22 Anna-Marie" and for the Committee the transcript of
23 this is at page 354.
24 A. Tab 6E, is it, Eoghan?
25 123 Q. In tab 6E, thank you. And we'll just play that. 15:12
26
27 (VIDEO PLAYED)
28
29

1 CHAIRPERSON: Do you need further technological
2 assistance, Mr. O'Sullivan?
3 MR. O'SULLIVAN: I'll check.
4 124 Q. Just while we are waiting I'll ask you about the last
5 video, [REDACTED] I didn't ask you about the last 15:14
6 video, when did you go online and download it?
7 A. The 8th December.
8 125 Q. 8th December of 2025 as well?
9 A. As well, 2025, yeah.
10 CHAIRPERSON: If there is a problem with that 15:17
11 particular video, perhaps you can move on to the next
12 one?
13 MR. E. O'SULLIVAN: We can, absolutely. I think... I
14 think it's the correct video being selected, but I
15 think it just needs to be dragged into the media 15:17
16 player.
17
18 (VIDEO PLAYED)
19
20 MR. E. O'SULLIVAN: Once the volume has been fixed, 15:21
21 we'll go back to the start.
22 CHAIRPERSON: Of course. It might be an idea, [REDACTED]
23 that whoever is in charge of the technological issues
24 here might remain in the room for the next two videos
25 as this doesn't seem to be the most effective way of 15:22
26 doing it, to be frank.
27 [REDACTED] Yeah, absolutely.
28
29 (VIDEO PLAYED)

1 126 Q. MR. E. O'SULLIVAN: And when did you access that
2 particular video and how did you do it?
3 A. I accessed it on the 8th December 2025. I went onto
4 the website Rumble and viewed the video. I then put
5 the URL into save the video.net and downloaded the 15:33
6 video and then I added it to Fieldfisher's case
7 management system Practice Evolve.
8 127 Q. And I think that particular link that you used is one
9 of the links referred to by [REDACTED] at page 228 of
10 the core book in his complaint of the 5th September 15:34
11 2024. It is rumble.com and there is a number of
12 numbers and letters and then it says:
13
14 "Liaising with the Council - James P. Nestor &
15 Anna-Marie Stack Rivas." 15:34
16
17 Is that right?
18 A. Yes, that's correct.
19 128 Q. And in relation to that particular video, could you
20 tell how many times it had been accessed or viewed? 15:34
21 A. I accessed it today, it's still publicly available, and
22 there is a play icon below the video with the number
23 "186" beside it. So I'm taking it that means it was
24 played 186 times.
25 129 Q. And I think you also searched for and downloaded 15:34
26 another video referred to by [REDACTED] in that
27 complaint, and that is a podcast with a person called
28 [REDACTED] is that right?
29 A. That's correct, yes, tab 6C.

1 130 Q. C?
2 A. Yeah.
3 131 Q. And the transcript of this, Chair, is at page 307.
4
5 (VIDEO PLAYED) 15:35
6
7 MR. E. O'SULLIVAN: So, Chair, subject to you, we might
8 finish up there and I can ask the final few questions
9 of [REDACTED] in the morning if that's okay to make sure
10 I have everything covered and then we have two further 16:41
11 witnesses.
12 CHAIRPERSON: How much longer would it take you to ask
13 the questions now? I'm just conscious of [REDACTED]
14 being a sworn witness and also being your instructing
15 solicitor. 16:41
16 MR. E. O'SULLIVAN: Because she is not under
17 cross-examination, I don't think that creates a
18 difficulty for me. I do want to make sure I've missed
19 nothing before I finish, so if you don't mind, I'd like
20 to keep her in the box for now. 16:41
21 CHAIRPERSON: Yes, okay. Ten o'clock in the morning.
22
23 THE HEARING THEN ADJOURNED UNTIL THURSDAY, 15TH JANUARY
24 2026 AT 10:00 A.M.
25
26
27
28
29