

APPROVED



**AN ARD-CHÚIRT
THE HIGH COURT**

[2026] IEHC 637

Record No. 2024 1373 JR

BETWEEN/

M.R.

APPLICANT

AND

THE MINISTER FOR JUSTICE

RESPONDENT

JUDGMENT of Mr. Justice Conleth Bradley delivered on the 21st day of September 2026

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INTRODUCTION

Preliminary

1. The Applicant (“Mr. R”) seeks to quash, by way of judicial review, a decision of the Respondent (“the Minister”) dated 2nd August 2024 refusing his application for a certificate of naturalisation.

Background

2. Mr. R is a national of Pakistan.
3. He entered the State on 1st November 2014 and applied for asylum on 11th December 2014.
4. However, arising from his marriage on 18th June 2015 to Ms. MPF, a Romanian national and EU citizen, the application for asylum was withdrawn and he obtained temporary permission to remain in the State from 9th November 2015 to 25th March 2016 pending his application for residence rights in Ireland based on European Union Treaty Rights (“the EUTR application”).
5. On 30th March 2016, Mr. R’s application for a residence card was granted by the Minister and he acquired Stamp 4EUFAM permission to remain, valid for a five-year period to 23rd March 2021, by virtue of his status as a spouse of an EU citizen who was residing in the State and in exercise of her EU Treaty Rights.
6. On 10th February 2017, however, Mr. R was notified of the Minister’s proposal to revoke his residence card. The Minister considered that the documentation provided in support of his application to evidence his residence was false and misleading as to material fact.

7. On 1st March 2017, Mr. R's former legal representative made submissions to the Minister on the breakdown of the Applicant's marriage to his spouse and informed the Minister that Ms. MPF had in fact left Ireland.
8. On 4th May 2017, Mr. R was informed that the Minister had considered that the documentation submitted by the Applicant was false and misleading as to material fact resulting in the revocation of Mr. R's residence card under Regulation 21(1) of the European Communities (Free Movement of Persons) Regulations 2015 ("the 2015 Regulations"). This revocation decision was not challenged in any subsequent proceedings.
9. Mr. R subsequently entered a relationship with his current partner, Ms. E, with whom he resides. They also have a son together.
10. On 5th July 2017, Mr. R applied for permission to reside in the State based on his Irish-born citizen child.
11. On 12th October 2017, Mr. R. acquired temporary permission to remain under Stamp 4 conditions which was valid for one year. This permission arose by virtue of his parentage of an Irish citizen child.
12. This temporary permission appears to have been continued on an annual basis.
13. Mr. R's application on 19th August 2021 for a certificate of naturalisation was deemed ineligible by ministerial decision dated 23rd March 2023 which was subsequently challenged

in judicial review proceedings and then compromised, resulting in the withdrawal of the decision of 23rd March 2023 and a fresh ministerial decision issuing on 2nd August 2024. It is this decision and recommendation dated 2nd August 2024 which is sought to be impugned in these proceedings.

14. On 18th June 2024, the Citizenship Division of the Department of Justice invited the Applicant's legal representatives to make any further submissions which they considered were appropriate in relation to Mr. R's claimed Irish associations.

15. The ultimate decision and recommendation of the departmental officials was accepted by the Minister and on 2nd August 2024, the Minister refused to grant Mr. R a certificate of naturalisation.

Proceedings

16. The Applicant's Statement of Grounds was filed on 1st November 2024, grounded on his Affidavit of the same date and that of his Solicitor, Mr. Khan also on 1st November 2024. A correcting Affidavit of the Applicant exhibiting correspondence between the parties was sworn on 26th November 2024. Mr. Khan exhibited the details of a Subject Access Request in a further Affidavit dated 2nd December 2024.

17. On 9th December 2024, the High Court (Siobhán Phelan J.) granted the Applicant leave to apply for judicial review.

18. A Statement of Opposition was filed on 24th June 2025 and this was verified by the Affidavit of Ashling Ryan, Higher Executive Officer, Citizenship Division, Immigration Service Delivery of the Department of Justice which was sworn on 27th May 2025.

DISCUSSION AND DECISION

19. In *Muhammed Nadeem Ahmed v Minister for Justice* [2024] IEHC 661 (“*Ahmed*”), the High Court (Siobhán Phelan J.), at para. 32 of her judgment, referred to the following caselaw as involving the assessment of good character for the purpose of an application for a certificate of naturalisation under s. 15 of the 1956: *M.N.N. v. Minister for Justice and Equality* [2020] IECA 185; *A.J.A. v. Minister for Justice and Equality* [2022] IEHC 624; *Hussain v. Minister for Justice* [2011] IEHC 171; [2013] 3 I.R. 257; *G.K.N v Minister for Justice* [2014] IEHC 478; *Mallak v. Minister for Justice, Equality and Law Reform* [2012] IESC 59, [2012] 3 I.R. 297; *A.A. v. Minister for Justice* [2019] IECA 272; *A.S.A v. MJE* [2022] IESC 49; *AP v. Minister for Justice* [2019] IESC 47; [2019] 3 I.R. 317; *Talla v. Minister for Justice and Equality* [2020] IECA 135; *M v. Minister for Justice* [2024] IEHC 105 and *Rana & Ali v. Minister for Justice* [2024] IESC 46.

20. At para. 33 of her judgment in *Ahmed*, Phelan J. also referred to the decision of the Court of Appeal (Costello J., as she then was, Power J. and Binchy J.) in *M.N.N. v Minister for Justice and Equality* [2020] IECA 187 where, at para. 52, Power J. summarised the following principles as emerging from the case-law to guide the exercise of ministerial power in such decisions:

“(i) in describing the Minister's discretion as ‘absolute’, the Oireachtas intended to emphasise that the grant of a certificate of naturalisation involves the conferring of a privilege;

(ii) the fact that naturalisation is the grant of a privilege does not mean that an applicant enjoys inferior legal protection when pursuing such an application;

(iii) the Minister’s absolute discretion to grant naturalisation only arises if satisfied that an applicant is of ‘good character’ and, extensive as that competence may appear, it does not release the Minister of the obligation to operate within the rule of law and his determination is amenable to judicial review;

(iv) in determining the criteria to be considered when assessing ‘good character’ an applicant’s character and conduct must be assessed against reasonable standards of civic responsibility gauged by reference to contemporary values;

(v) the connection between character and criminality can only be established when the Minister has all relevant information, including, context and mitigating factors, in connection with a crime;

(vi) information that is presented to the Minister in a submission or recommendation must be accurately recorded, complete and seen in context and considered in full by the decision maker before reaching a determination; and

(vii) in deciding whether an applicant fulfils the ‘good character’ requirement of the Act, the Minister must undertake a comprehensive assessment of an applicant as an individual and must consider all aspects of character.”

21. At para. 41 of her judgment in *Ahmed*, Phelan J. considered that the assertion made on behalf of the Applicant that the prior use of a false identity in the asylum process which had occurred many years previously was “*irrelevant*” in the naturalisation process, was “*wholly untenable*”.

Phelan J. stated that “[t]he use of a false name in the asylum process reflects badly on the Applicant’s honesty and integrity, both of which are central to the question of good character which the Minister is obliged to consider when making a determination relating to a certificate for naturalisation. It is undeniable that the submission of an application in a false name in an application for refugee status is properly relevant to the issue of good character under s. 15(1)(b) of the 1956 Act, although the significance to be attached to this negative factor may vary from case to case depending on the explanation offered and other circumstances including counter-balancing positive evidence.”

22. Then at paras. 42 and 43 of her judgment in *Ahmed*, Phelan J. stated as follows:

“(42) Accordingly, the Minister did not err in considering the fact that a protection application had been made in a false name when deciding whether the Applicant satisfied the good character criterion mandated under s. 15(1)(b) of the 1956 Act. That does not mean that past wrongdoing will be forever relied upon in refusing an application for a certificate of naturalisation. Certainly, the weight to be attached to prior bad behaviour becomes less with the passage of time, particularly where there is no further evidence of bad character in the ensuing period but while potentially of diminishing significance, it is not rendered irrelevant.

(43) Clearly the more egregious the act of wrongdoing is in advancing a false identity as determined in light of the factual context and mitigation or exculpatory factors advanced, the more will be required on the positive side of the scales to persuade the Minister that “good character” within the meaning of s. 15(1)(b) of the 1956 Act has been established. The fact that the weight to be attached to prior bad conduct becomes less does not mean that previous evidence of bad character should not be considered

and may not be weighed negatively as a factor against the grant of a certificate of naturalisation on character grounds.”

23. The ‘adequacy of reasons’ assessment then commenced at para. 60 of the judgment in *Ahmed*.

24. As set out later in this judgment, the following observations at paras. 60 to 62 of the judgment of Phelan J. in *Ahmed* could equally apply to the decision and recommendation dated 2nd August 2024 in the circumstances of Mr. R’s application:

“(60) There is no ambiguity as to the basis for the decision to refuse a certificate of naturalisation on character grounds in this case. The submission supporting the Minister’s decision sets out relevant considerations including factors urged in mitigation or exculpation in a fair manner. The manner in which competing considerations are weighed is clearly set out. On the basis of the record of the decision, it is plain what matters were considered and weighed in the decision on character.

(61) It is further clearly set out that when all the relevant factors identified are weighed, the opinion was that the requirement to be of good character in s.15(1)(b) of the 1956 Act was not met because the Applicant has on occasion failed to respect the laws of the State. While it is expressly acknowledged the offences are of some antiquity, it is explained that taken “cumulatively”, the evidence demonstrates that the Applicant has not demonstrated a sufficiently responsible attitude to the civil responsibilities of Irish society.

(62) In addition, the use of false and misleading information in the course of the Applicant’s asylum application process was considered to show disregard for the State’s immigration regulations and was treated as a very serious matter as it has a direct impact on genuine asylum seekers. The matters which reflect adversely on the

Applicant's character were said to be serious and significant in nature, and on weighing the negative factors against the positive evidence of good character of the Applicant, the conclusion arrived at was that the overall balance favours a conclusion that the Applicant is not of good character. The basis for this conclusion is crystal clear and there is no ambiguity as to why the refusal recommendation, upon which the decision was based, was made.”

25. Whilst this is addressed in more detail later in this judgment in the context of the decision and recommendation dated 2nd August 2024, as in *Ahmed* (para. 84), I too am satisfied that an appropriate opportunity was afforded to Mr. R to advance contextual and exculpatory evidence and that the conclusion reached by the Minister as to the Applicant’s character flowed from the evidence before her.

26. In Mr. R’s case, the issues raised by him in support of his application were not brushed aside, as contended for by the Applicant.

27. Rather, a balancing exercise was carried out which expressly considered both positive and negative factors.

28. Further, the following observations of the High Court (Ferriter J.) in *Akande v The Minister for Justice and Equality* [2025] IEHC 679, at paras 45 and 46 of his judgment, have similar application to the process engaged in the decision and recommendation dated 2nd August 2024:

“(45) Ultimately, it seems to me that the applicant's case amounts to an invitation to the court to substitute a different decision on the merits of the case. This, of course, is something which the court cannot do; it is for the Minister and not the court to attach

the weight she considers appropriate to the various positive and negative factors in determining whether good character is established. (46) While the applicant is to be commended for the manner in which he has turned his life around and has lived and worked without blemish since his release from prison, in my view, he has not made out irrationality in the decision in the legal sense. Failure to have regard to relevant considerations, or improper reliance on irrelevant considerations, is not made out. The Minister took into account all relevant information and submissions. She used her judgment to assess the weight to be given to the various positive and negative factors presenting to arrive at her conclusion, including the continuing weight to be attached to the serious conviction. This Court cannot second guess that weighing exercise.”

29. In Mr. R’s case, the positive factors included the vetting information from An Garda Síochána, the extensive submissions from Mr. R’s legal representative, the findings of the EUTR Division of the Department of Justice, Mr. R’s steady employment history, his commitment to his minor child and the fact that he held a current immigration permission valid to 6th July 2025 and his “*tangible connection to the State*” was “*acknowledged, having lived and worked here since 2014, making an economic contribution to the State and a valuable contribution to Irish cultural society*”. It was further expressly acknowledged that Mr. R that had “*resided in the State for 9 years*” and had “*no criminal charges or convictions recorded against him in the State*” and that “[t]his matter is to the applicant’s credit and reflects positively on the applicant’s character.”

30. In balancing and weighing up these matters, the decision then determined that “*However, this must be weighed against both the seriousness of the false and misleading information findings. In his previous interactions with the immigration system, [Mr. R] failed in both his obligations*

under the Regulations as basic trustworthiness: the latter being a key element of good character". Ultimately, the decision concluded as follows:

"The matters which reflect adversely on the applicant's character are serious and significant in nature. Weighing these negative factors against the positive evidence of good character on the part of [Mr. R], it is considered that the overall balance favours a conclusion that the applicant is not of good character. I am not satisfied that the applicant meets the good character criterion in [s.15(1) of the 1956 Act]. By reason of all of the foregoing, I would not recommend that the Minister grant a certificate of naturalisation in the applicant's case".

31. Accordingly, I do not agree with the central submission made on behalf of Mr. R that by the manner in which the decision and recommendation dated 2nd August 2024 was made, it unlawfully dismissed or 'brushed aside' his explanation in relation to what, it was submitted on Mr. R's behalf, the respondent had treated as immutable negative findings previously made in the decision and recommendation in relation to (a) a purported finding of a marriage of convenience and (b) a purported finding that the Applicant had absconded and (c) that the Applicant had submitted false and or misleading documentation.

32. Whilst the Applicant's entire file was considered, the ultimate negative recommendation made to the Minister in relation to Mr. R's application for a certificate of naturalisation had expressly considered positive *and* negative factors and was predicated solely on the finding that he had submitted *false and or misleading* documentation as to material fact in support of his application for a residence card as a family member of an EU citizen. It was on this basis that Mr. R's residence card had been revoked. The recommendation not to grant a certificate of naturalisation to Mr. R was not in relation to the marriage of convenience issue or the

absconding question and it was not the case, therefore, that a reasonable reader of the decision dated 2nd August 2024 would consider that these issues were “left hanging”, as was suggested.

33. Accordingly, the recommendation made on behalf of the Minister and dated 2nd August 2024 engaged in a balancing exercise in which the pros and cons and the positive and negative factors were clearly put forward in addressing the question of Mr. R’s ‘good character’ and carefully weighed. It was not left to implied references as is suggested and where the ‘negative’ must equally be implied with the ‘positive’. Rather, the rationale for the negative ‘recommendation’ in the decision dated 2nd August 2024 clearly pointed to where Mr. R had previously submitted false and or misleading documentation and this was considered as part of the balancing exercise carried out.

Letter of 2nd August 2024

34. By letter dated 2nd August 2024, the Citizenship-CMUS Division of the Department of Justice wrote to the Applicant’s solicitors, IMK Law Solicitors, and stated that the Minister had considered Mr. R’s application under the provisions of the Irish Nationality and Citizenship Acts 1956-1986 as amended (“the 1956 Act”) and had decided not to grant a certificate of naturalisation.
35. The letter further stated that a copy of the submission which had been prepared for the Minister with the decision, was enclosed. The letter stated that in reaching this decision the Minister had exercised her absolute discretion as provided for by the 1956 Act. It confirmed that there was no appeals process provided under the legislation but that the Applicant should be aware that they could re-apply for the grant of a certificate of naturalisation at any time. The letter stated that when considering making such a re-application, the Applicant should give due regard to

the reasons for refusal given in the document, which was attached, and that any further application would be considered taking into account all statutory and administrative conditions applicable at the time of the application.

36. The decision and recommendation dated 2nd August 2024, enclosed with this correspondence and which is sought to be impugned in this application for judicial review, was entitled '*Adult Application for a Certificate of Naturalisation*' ("the decision").

37. Having regard to the Applicant's contentions, particularly in relation to the suggested findings of marriage of convenience and absconding, it is apposite to outline the structure of the decision dated 2nd August 2024 and the relationship between the narrative part of the decision with the analysis in the recommendation section of the decision.

38. In so doing, this confirms that (a) the decision-makers carried out a balancing of negative and positive factors in assessing Mr. R's application for citizenship (b) the recommendation was based on an assessment relating to the submission of false and or misleading documentation by Mr. R.

Decision & recommendation dated 2nd August 2024

39. The commencement of the decision referred to s. 15 of the 1956 Act and stated that upon receipt of an application for a certificate of naturalisation the Minister may, in his or her absolute discretion, grant that application where satisfied that the applicant fulfils the conditions for naturalisation specified in s. 15(1)(a)-(e) of the 1956 Act, *i.e.*, the conditions for naturalisation.

40. It then made the point that naturalisation is a privilege rather than a right or entitlement.

41. It stated that the onus was on each applicant to disclose in their application all of the appropriate information and evidence to help demonstrate that he or she satisfied the conditions for a certificate of naturalisation including the requirement pursuant to s. 15(b) of the 1956 Act, that an applicant “*is of good character.*”
42. It is the manner in which the respondent addressed this question which is the central issue in this application for judicial review.
43. The decision then referred to s. 16(1) of the 1956 Act, which provides that the Minister may, in his absolute discretion, grant an application for a certificate of naturalisation in the following cases, although the conditions for naturalisation (or any of them) are not complied with: (a) where the applicant is of Irish descent or has Irish associations.
44. It then referred to s. 16(2) of the 1956 Act, which provided that for the purposes of this section a person is of Irish associations if – (a) he or she is related by blood, affinity or adoption to, or is a civil partner who is, an Irish citizen or entitled to be an Irish citizen.
45. The decision then commenced a ‘narrative’ which addressed matters under the following heading “*Facts and circumstances of the Applicant*”.
46. The first sub-heading in this narrative was “*Life of the Applicant in the State*”.
47. This included the correspondence which passed between Mr. R and departmental officials from his entry into the State on 1st November 2014, his application for asylum on 11th December

2014, the details of what transpired (including correspondence) during 2015, 2016, 2017, 2021, 2024 and correspondence on the 18th June 2024 where the Citizenship Division of the Department of Justice issued a letter to Mr. R's legal representative in order to afford him an opportunity to provide any further documentation or information in connection with the Irish associations claimed, as well as any submissions which Mr. R wished to make in order to assess the Irish associations claimed.

48. It is apposite at this juncture to reconsider, in summary, the issues of absconding, the receipt of false and misleading information and marriage of convenience.

49. During the hearing of the judicial review application, emphasis was placed on the reference to Mr. R's failure to turn up having been notified to present himself to the GNIB on 14th May 2015, to make arrangements for his removal from the State, as his having absconded. It was submitted that his legal representatives had explained that Mr. R was not residing at that time at the address to which this correspondence had been sent and there was, therefore, an explanation to this "finding" which the Minister did not adequately consider. On behalf of Mr. R, it was submitted that the documents exhibited as part of the Subject Access Request suggested that in or around May 2015 he had moved from the Balsekin Centre, St. Margaret's Road Finglas which was the address on the face of the letter dated 14th May 2015.

50. Next, in relation to the receipt of false and misleading information, the letter of 4th May 2017 revoking Mr. R's permission to remain in accordance with the provisions of Regulation 27(1) of the 2015 Regulations and Article 35 of Directive 2004/38/EC ("the Citizens' Rights Directive") referred *inter alia* to a letter from his solicitor dated 1st March 2017 which stated

that his relationship with Ms. MPF had broken down and that she had in fact left the jurisdiction. This letter dated 4th May stated *inter alia* as follows:

“The Minister is satisfied that the EU national no longer resides in the jurisdiction and that you cease to qualify for residence under the provisions of the European Communities (Free Movement of Persons) Regulations 2015.

Based on the above[,] [t]he Minister is satisfied that the documentation you provided in support of your application to evidence the exercise of rights by your spouse in this State are also false and misleading as to a material fact. You knowingly submitted this documentation in order to obtain a right of residence which you otherwise would not enjoy. This constitutes a fraudulent act within the meaning of the Regulations and Directive, which provides that Member States may refuse, terminate or withdraw any rights conferred under the Directive “in the case of abuse of rights or fraud, such as marriages of convenience.” This is found to be the case and the Minister has decided to revoke your permission to remain in accordance with the provisions of Regulation 27(1) of the Regulations and Article 35 of the Directive” (Emphasis underling in original letter dated 4th May 2017).

51. In relation to this matter, it was contended on behalf of Mr. R that his solicitor had communicated *inter alia* that Mr. R had not been aware of the discrepancy on the PPSN on the payslips submitted to support his EUTR 1 application and that he had not provided false and misleading documents. It was stated that Mr. R had apologised for his innocent mistake which he believed was an honest mistake that had occurred in the submission of the payroll by the accountant. Further, it was stated that Mr. R had tried to contact his former employer but that he was no longer in business.

52. In relation to the reference to ‘marriage of convenience’, it was contended on behalf of Mr. R that the references to marriage of convenience in *inter alia* the letter dated 4th May 2017 including, for example, that “*It is noted that the Minister’s concern that the relationship was a marriage of convenience contracted for the sole purpose of obtaining a derived right of free movement and residence under EU law as a spouse was not directly or adequately addressed*” had ‘re-entered’ the decision-making process in the decision dated 2nd August 2024 by, for example, this reference in the correspondence dated 4th May 2017 although no finding had been made.
53. The second sub-heading in the decision dated 2nd August 2024 referred to “*Documentation*” where the relevant documentation was listed.
54. The decision then sets out a narrative under the following sub-heading “*Matters relevant to an assessment of the Applicant’s character*”.
55. The following matters are then sequentially addressed under further sub-headings as they relate to the Applicant’s character in (i) a negative manner (ii) a positive manner, or (iii) in a neutral way: (a) “*Concluded Criminal Proceedings*”; (b) “*Current or ongoing proceedings*”; (c) “*Other matters relevant to an assessment of the Applicant’s character.*”
56. Under the categories *Concluded Criminal Proceedings* and *Current or ongoing proceedings*, the decision and recommendation *inter alia* stated that Mr. R’s disclosure during the application process, that he had accrued three penalty points for a minor road traffic infraction, was to “*to the Applicant’s credit*”.

57. It further stated that vetting searches conducted by the National Vetting Bureau (An Garda Síochána) on 9th April 2024 had confirmed that Mr. R had no criminal charges or convictions recorded against him in the State.
58. It also stated that a Police Clearance Certificate from the authorities in Pakistan, dated 19th July 2018, had been provided by Mr. R to support his application for naturalisation by confirming that there was no adverse record against him in Pakistan and that he was of good moral character. Again, this part of the decision stated that these matters were “*to the Applicant’s credit and reflects positively on the Applicant’s character, with the result that it falls to be weighed favourably as regards to an assessment of [Mr. R]’s character.*”
59. Much of the detail of the narrative in the decision, including the positive and the negative factors, is addressed under the sub-heading “*Other matters relevant to an assessment of the Applicant’s character.*”
60. Under this part of the decision, it recorded that Mr. R had sought to invoke the ministerial discretion in s. 16 of the 1956 Act that his application be considered on his Irish associations through blood to his son, whose name was given and who is an Irish citizen born in Spring 2017. It stated that Mr. R was requesting that the Minister utilise her absolute discretion under s. 16 of the 1956 Act to consider the particularities of his case.
61. The decision confirmed that s. 16 of the 1956 Act conferred broad discretionary powers in the Minister in granting a certificate of naturalisation. It stated: “*It is ministerial policy that these powers should be used sparingly and only in exceptional and compelling circumstances,*

particularly where the predominant pathway to naturalisation under s.15 is unavailable to an applicant.”

62. It further stated that “[m]eeting the conditions of naturalisation under s.15 is the predominant pathway to citizenship by naturalisation, as recently confirmed by the Court of Appeal (see *Borta v Minister for Justice* [2019] IECA 255 at paragraph 20). Consequently, the Minister will only waive these conditions under s.16 in the most exceptional and compelling circumstances, and the vast majority of Applicants are expected to meet these s.15 conditions and the similar conditions which exist under s.15A.”

63. The decision then referred to enclosures received from Mr. R’s legal representatives dated 20th June 2024, including vouching documentation in the context of the Irish associations claimed, including a copy of his son’s birth certificate, a letter from a principal of primary school, a letter from his son’s G.P., utility bills in the name of Mr. R and Ms. E, as proof of their joint residency, and photographs demonstrating the close connection between Mr. R and his son in support of his application for naturalisation under s. 16(a) of the 1956 Act.

64. The decision stated that Mr. R’s legal representatives had submitted that he plays an important role in his son’s daily life and that the Irish citizen child was emotionally attached to him and had been dependent on Mr. R since his birth, both financially and again, emotionally.

65. The decision stated that Mr. R had “*resided in the State since 2014 and therefore has strong ties to the State. NMCA Legal, Immigration Law Practitioners submit that the Applicant has remained in full-time employment with no recourse to public funds, apart from sporadic Covid payments. [Mr. R] is currently engaged in self-employment as a taxi driver. The applicant’s*

steady employment history reflects his commitment to contribute to the Irish economy and society. These matters are to the Applicant's credit and constitute evidence in favour of the applicant's good character and his application for naturalisation."

66. The decision then referred to the 'EUTR' decision referenced above where Mr. R had been found by the Minister to have submitted information which was to his knowledge false or misleading in a material particular, for the purpose of seeking an entitlement conferred by the 2015 Regulations.
67. It stated that while it was acknowledged that Mr. R did not accept that he had provided false and misleading information to the Minister, he had not contested the revocation decision.
68. The decision stated that it further remained the case that Mr. R sought to obtain an immigration advantage through the provision of information known to him to be false and misleading in a material particular. It stated that this was an extremely serious matter, which was considered to reflect adversely on Mr. R's character.
69. The decision referred to the fact that on 4th May 2017, Mr. R had been informed that the Minister had revoked his residency card as the Minister was of the opinion that the documentation that he had provided in support of his application was misleading as to material fact. It stated that this constituted a fraudulent act within the meaning of the 2015 Regulations and the Citizens' Rights Directive, and the Minister had decided to revoke his residency card in accordance with the provisions of Regulation 27(1) of the 2015 Regulations and Article 35 of the Citizens' Rights Directive. The decision stated that Mr. R did not seek a review of the

Minister's decision and that accordingly, for the purpose of the within decision, the facts as found and conclusions made were relied upon in full.

70. The decision referred to correspondence from the Citizenship Division of the Department of Justice dated 16th April 2024 to Mr. R's legal representative which sought to afford him an opportunity to provide any relevant factual or contextual information in connection with the findings outlined by the EUTR letter dated 4th May 2017 (which copy was appended to the decision) as well as any submissions that Mr. R may wish to make in relation to the assessment of whether he was of good character. The decision stated that this correspondence also requested that he specifically address the reason why he did not present himself for removal on 4th May 2015.

71. The decision then set out in detail the letter dated 18th April 2024 which had been received from Mr. R's legal representative.

Letter dated 18th April 2024

72. As just mentioned, the decision then quotes extensively from the Solicitor's letter dated 18th April 2024 under the sub-heading "*Other matters relevant to an assessment of the Applicant's character.*"

73. At the hearing of this judicial review application, it was submitted, by reference to this letter, that it had addressed *inter alia*: (a) the purported finding of a marriage of convenience; (b) the purported finding that Mr. R had absconded; and (c) the reference to the submission of false and or misleading documentation and that, in the exercise of ministerial discretion, the decision dated 2nd August 2024 failed to adequately address these matters.

74. For example, in the extract of the letter dated 18th April 2024, which is quoted in the decision dated 2nd August 2024, it was *inter alia* stated in relation to the decision of 4th May 2017 to revoke the residence card and that Mr.R had submitted documentation which was false and misleading as to the material fact, that Mr. R “*submits that he was not aware of the discrepancy on the PPSN on the payslips submitted to support his EUTR 1 application*” and “*submits that he did not provide false and misleading documents and he apologised for his innocent mistake, which he believed to be an honest mistake [which] arose from the accountant at the time of submitting the payroll. He submits that he did not challenge the Minister’s finding at the time, as he was advised by his then legal representative to close the EUTR matter in order to proceed with his application for a residence card on the basis of his parentage of an Irish citizen child ... our client could have challenged the Minister’s decision back then but he chose not to do so as he was, first, advised against the appeal process which would be lengthy and time consuming, and second, he has welcomed his Irish citizen child in 2017 and [is] [sic.] since then entitled to a permission to remain in the State on Stamp 4 conditions. He now regrets ... [sic.] not fighting for his good name at that time and it comes to his surprise that the Minister is proposing to refuse his application for a certificate of naturalisation having relied on his EUTR file, closed in 2017, due to an honest mistake occurred through no fault of [his. He has tried to contact the employer concerned and was unfortunately informed that the business was long terminated, [Mr. R] is extremely disappointed to be labelled as a “bad character” because of the Minister’s findings dated back to 2017, and he [refutes] [sic.] the accusations made against him. He has never produced any fraudulent documents in order to obtain a residence card. His relationship with the EU citizen back then was more than genuine and on the basis of submitted evidence, he was granted a 5-year residence card valid from 2016 to 2021.*”

75. Similarly, in the extract of the letter dated 18th April 2024 (referred to in the decision dated 2nd August 2024), reference is made to the letter of May 2015 in which the Applicant was required to present (but did not do so) to the GNIB office on 14th May 2015 to effect his removal to the UK.

76. The letter of 18th April 2024 *inter alia* states:

“Our client did not present himself. Again, our client submits that this is a separate matter which was closed in 2015 and is irrelevant in his citizenship application. Our client understands that the Minister may refuse to grant him a certificate of naturalisation if she is satisfied that our client is not of good character. However, our client submits that the Minister has erred in law and in fact in relying on this finding. First and foremost, our client submits that he never [received] [sic.] the letter ... proposing to transfer him back to UK in 2015. Besides, he submits that he did not intend to continue his IPO application after he married his EU citizen spouse in around 2015. He has attended ... his local immigration officer to register himself as spouse of an EU national in 2015 as soon as he was granted a permission to do so. At the time of registration, our client was informed that there had been a deportation order made against him; in order to successfully register him, such deportation order needs to be revoked and the immigration officer had kindly helped him so. Our client was assured that the removal order had been cancelled, and he was subsequently granted a permission to remain in the State on Stamp4EUFam conditions. [Mr. R] [refutes] [sic.] being called a “bad character” because of the miscommunication and he submits that he has no intention to deceive the immigration system. He has been a law-abiding resident, and he has been residing in the State for over 10 years. To accuse him of things that he never committed, let alone the fact that those events occurred between

2015-2017, the Minister fails to prove the balance of probability and our client has been prejudiced as a result”.

77. After expressly referring *inter alia* to these matters which were contained in the letter dated 18th April 2024, the decision of 2nd August 2024 stated that they had been considered carefully when formulating the recommendation but that they did not constitute credible evidence to allay the Minister’s concerns.
78. The decision then referred to the fact that on 4th May 2017, Mr. R had been informed of the Minister’s finding in relation to Regulation 27 of the Regulations. The decision stated that the Minister concluded that documentation supplied by Mr.R was “*false and misleading as to material fact*” and that the Minister also noted that Mr. R knowingly submitted this “*false and misleading documentation*” in order to obtain a right of residence in the State that he would otherwise not be entitled to.
79. The decision then observed that the Minister could revoke a permission to remain in accordance with Regulation 27 of the 2015 Regulations and Article 35 of the Citizens’ Rights Directive in the case of fraud or abusive rights (including marriages of convenience). The decision further stated that contrary to Mr. R’s assertion, the Minister did not consider such finding to be a closed transaction in this particular case. It stated that the continuing relevance in the immigration decision making process, once considered and weighed “*in the round*” as had been done here, was recently confirmed by the decision of the Court of Appeal¹ in *SA and LA v Minister for Justice* [2023] IECA 277. The decision stated that the correspondence provided

¹ Power J., Butler J., Meenan J. (judgment of the Court delivered by Meenan J. on 13th November 2023.)

did not offer a credible explanation for Mr. R's actions and did not allay the Minister's concerns in this regard.

80. It further stated that, based on this decision by the Minister, it was clear that the above conduct of Mr. R reflected negatively on his character for the purpose of an assessment under s. 15(1) of the 1956 Act and added as follows: *"According to the assessment of the Minister, the Applicant intended to mislead the immigration system of the State by supplying false and misleading documents. Taking into account the above facts, the Applicant has displayed a degree of dishonesty that weighs negatively in the assessment of his character under s.15(1) of the 1956 Act."*

81. The decision stated that the Minister was deeply concerned about deception of this magnitude in the context of the immigration system and had weighed the evidence against Mr. R's character accordingly.

82. The decision of 2nd August 2024 then set out the *"Recommendation"* in the following terms:

"Recommendation:

S.15(1) of the [1956 Act] provides that "Upon receipt of an application for a certificate of naturalisation, the Minister may, in his absolute discretion, grant the application if satisfied that the Applicant '(b) is of good character'.

In order for the Applicant's application for naturalisation to be successful, therefore, the Minister must be satisfied that the Applicant fulfils the statutory conditions set out in s.15(1) of the 1956 Act, including the criterion the Applicant is "of good character".

The Minister will be aware that this matter is the subject of a Judicial Review settlement agreement before the courts. I have considered the entirety of the file including the

vetting disclosure received from An Garda Síochána, the extensive submissions from the Applicant's legal representative, the findings of the EUTR Division, the Applicant's steady employment history, his commitment to his minor child and the fact that the Applicant holds current immigration permission valid to the 6th July 2025. The Applicant's tangible connection to the State is acknowledged, having lived and worked here since 2014, making an economic contribution to the State and a valuable contribution to Irish cultural society."

83. Pausing here, it can be observed in the extract of the recommendation just quoted, a balancing exercise was engaged in this decision and all of the positive aspects of the Applicant's application are clearly referred to and assessed.

84. Further, I do not consider what the Applicant accepted was now, since the decision in *Diniz v Minister for Justice* [2026] IECA 34 ("*Diniz*"), a discrete residual point in relation to s. 16 of the 1956 Act has any merit. The Applicant refers to the extract quoted above and the reference to "*while the Applicant undoubtedly meets the statutory test in s.16(1)(a) in that he has an Irish Association of 7 years duration with his son, that in itself is not sufficient to guarantee to waiver of the s.15 conditions. In Borta v Minister for Justice [2019] IECA 255, the Court of Appeal made clear that the predominant pathway to naturalisation is through meeting the s.15 conditions. It follows that the Minister may expect something exceptional to present in the application for a waiver under s.16. In the Minister's view, the Applicant's circumstances and Irish Associations are not exceptional enough for the Minister to waive the weighty negative good character against the Applicant under s.15(1)(b)*". He submits that this is insufficient reasoning and that it is a conclusion rather than a reason.

85. However, not only has Mr. R been an engaged participant, both before and after his application for a certificate of naturalisation, and at each stage has had access to legal advisers, the decision of 2nd August 2024 carefully weighed the positives and negatives in assessing s. 16 of the 1956 Act.

86. Further, in the context of the waiver process under s. 16 of the 1956 Act, whilst the Minister accepted the existence of Mr. R's Irish associations through blood to his son (who is an Irish citizen born in the State in Spring 2017), this was insufficient, in and of itself, to guarantee the exercise of ministerial discretion to grant the waiver, as requested by Mr. R. The decision in this respect again entailed a careful balancing exercise where the "Recommendation" continued as follows:

"The Applicant invokes the Ministerial discretion of s.16 of the 1956 Act that his application be considered on his Irish associations through blood to his son, an Irish citizen, born in the State on [Spring 2017]. [Mr. R] has requested that the Minister utilises her absolute discretion under s.16 to consider the particularities of his case. The application is therefore also examined pursuant to s.16. The Minister accepts the existence of the Applicant's Irish Associations by blood as set out above, although these are not sufficient in and of themselves to guarantee the Minister will exercise her discretion to grant the requested waiver."

87. Again, as part of the balancing exercise, the decision clearly refers to the Irish association and considers the s. 16 request. This request is further detailed in the following passage in the Recommendation as follows:

"It is entirely appropriate that the majority of naturalisation Applicants must satisfy the relevant criteria under s.15. The Applicant's associated Irish associations are beyond

question in this case. [Mr. R] has demonstrated a tangible connection to the State, having lived here since 2014, while providing a pivotal role in the upbringing of his son, since his birth in [Spring 2017]. The Applicant's asserted Irish Associations are beyond question in this case through his relationship by blood to his Irish citizen son of 7 years duration. However, given the seriousness of the finding of fraud against the Applicant, which finding has not been challenged by way of review, the Minister is of the view that it would not be appropriate to use the s.16 power of waiver in respect of good character conditions in this case. Contrary to the Applicant's assertion, the Minister does not consider such finding to be a closed transaction in this particular case. The continuing relevance in the immigration decision process, once considered and weighed "in the round" as has been done here, has recently been confirmed by the courts:- SA and LA v Minister for Justice [2023] IECA, 227.

In addition, while the Applicant undoubtedly meets the statutory test in s.16(1)(a) in that he has an Irish Association of 7 years duration with his son, that in itself is not sufficient to guarantee to waiver of the s.15 conditions. In Borta v Minister for Justice [2019] IECA 255, the Court of Appeal made clear that the predominant pathway to naturalisation is through meeting the s.15 conditions. It follows that the Minister may expect something exceptional to present in the application for a waiver under s.16. In the Minister's view, the Applicant's circumstances and Irish Associations are not exceptional enough for the Minister to waive the weighty negative good character against the Applicant under s.15(1)(b).

The Applicant submitted false or misleading documents to conceal this duplicity and mislead the Minister. The Applicant misled the Minister in order to obtain an immigration permission in the State that he was not entitled to.

[Mr. R] has resided in the State for 9 years and had no criminal charges or convictions recorded against him in the State. This matter is to the Applicant's credit and reflects positively on the Applicant's character. However, this must be weighed against both the seriousness of the false and misleading information findings in his previous interactions with the immigration system, [Mr. R] failed in both his obligations under Regulations as well as basic trustworthiness: the latter being a key element of good character.

The matters which reflect adversely on the Applicant's character are serious and significant in nature. Weighing these negative factors against the positive evidence of good character on the part of [Mr. R], it is considered that the overall balance favours a conclusion that the Applicant is not of good character. I am not satisfied that the Applicant meets the good character criterion in s.15(1)(b) [of the 1956 Act]. By reason of all of the foregoing, I would not recommend that the Minister grants a Certificate of Naturalisation in the Applicant's case.

Outcome: Not recommended, file submitted for Minister's decision, please.

[Signed by officials of the Department of Justice and dated 2nd August 2024]”.

88. Accordingly, as set out above, in accepting this recommendation dated 2nd August 2024, the Minister was entitled to rely on the previous decision of 4th May 2017 revoking Mr. R's EU residence card in the later assessment of good character.

89. By analogy, in *Rana and Ali v The Minister for Justice* [2024] IESC 46 (“*Rana and Ali*”), the Supreme Court (O'Malley J.) stated as follows:

“(88) The particular bad conduct found to have been engaged in by the respondents did not result in criminal convictions. Nonetheless, it must be seen as having been at a very

high level of gravity. It was in fact a criminal offence under the regulations to assert immigration entitlements on the basis of fraudulent means, including either a marriage of convenience or false or misleading documentation. Furthermore, it could be said that in this particular context the use of fraudulent means is an attack on the integrity of not only this State's immigration system but also, in a broader sense, the EU immigration system. Each of the respondents used the system to claim EU rights to which they were not entitled.

(89) The Minister found the conduct, in each case, to be sufficiently serious to justify a decision to revoke all entitlements that the claimed status had given the respondents, leaving each of them without permission to remain. In each case that decision was made under a statutory power, was not reviewed under the regulations or challenged in any way at the relevant time. It is not now open to challenge. This situation would not justify an assertion that the respondents committed criminal offences, but it does justify the Court in assuming that the gravity of the conduct, and the appropriate response, was properly assessed at the time. In my view, it was not necessary for (and, arguably, would not have been open to) the decision-makers under the Special Scheme to reassess the question of gravity and to see where, on the spectrum of marriages of convenience, these particular transactions fell. That was a matter for the previous process, where it could have been argued by the respondents that, for example, revocation of permission to be in the State was based on erroneous grounds, or was disproportionate to what they had done.

(90) I therefore consider that it was appropriate for the decision-makers to approach the assessment of the applications on the basis that the applicants had already been found to have engaged in very serious misconduct that had justified revocation of their immigration status. I would not, however, go so far as Costello J., in that I would not

consider that such a finding meant, in effect, that the applications under the Special Scheme could in no circumstances have been successful. It was still necessary for the Minister to consider what they put forward as evidence of good conduct. Nonetheless, any person seeking to claim “good character” in such circumstances must, as Phelan J. said, have a steep hill to climb. In my view, the obligation is on them to show something that, looking at all relevant factors, has the potential to counteract the previous finding, rather than there being an obligation on the decision-maker to reassess that finding ...

(97) It is to my mind unarguable that the most significant feature was the fact of the previous finding of bad conduct. That finding was, inevitably, of particular relevance to a subsequent decision in the immigration context. The respondents asserted that the refusal decision was disproportionate – if they meant that it was a disproportionate response to the conduct, I would consider that to be a difficult argument to sustain in the light of the fact that the conduct had previously been found to be grounds for the unchallenged revocation of their immigration permission. Was it, in that context, necessary for the reviewing officer to state expressly that they did not find that the additional character evidence warranted a different result? Perhaps it would have been preferable to say so, but I cannot see that the clarity of the decision would have been greatly enhanced by the express statement that the new character references did not outweigh the bad conduct. I would agree with Phelan J. that nothing in the new material could have warranted setting aside the first-instance decision.”

90. In *M v The Minister for Justice* [2025] IECA 1, the Court of Appeal (Whelan J., Binchy J. and Hyland J.), at para. 61, Hyland J. referred to para. 86 of the judgment of the Supreme Court in *Rana and Ali* where O'Malley J. *inter alia* observed that the words “good character and

conduct” did not convey any particular legal meaning but were required to be assessed in the context in which they were utilised. When used in the Special Scheme, which was at issue in that case, the concept was intended to be more strictly applied than, for example, in the scheme for the long-term undocumented migrants but there was “*no inconsistency in finding that an individual could fail a good conduct requirement for one purpose but pass it for another.*”

91. Further, it was accepted on behalf of Mr. R that, apart from the discrete argument in relation to s. 16 of the 1956 Act, his challenge in relation to s. 16 of the 1956 Act largely fell away consequent upon the decision of the Court of Appeal in *Diniz*.

92. At para. 16 of the Court’s judgment in *Diniz*, Collins J. refers to the ministerial policy that the predominant pathway to naturalisation is for applicants to meet the conditions in s. 15(1) of the 1956 Act. Accordingly, it is only in rare, exceptional or compelling circumstances that the Minister will waive these conditions under s. 16 of the 1956 Act.

93. At para. 19 of his judgment in *Diniz*, Collins J. *inter alia* observed that it was not being contended by the applicant in *Diniz* that “*the respondent is not entitled to have a policy with regard to the exercise of the absolute discretion ss. 15 and 16 of the [1956 Act] confers, but that such a policy must be exercised within the four corners of those provisions. The breadth of the discretion that those two sections confer and the symbiotic relationship between them are capable of justifying the respondent adopting a policy whereby an applicant must furnish exceptional and compelling reasons for non-compliance with the conditions for naturalisation before the respondent is prepared to waive that non-compliance and to exercise his/her discretion under s.16 of the [1956 Act]. It thus cannot be said that those provisions create a legal obstacle to the respondent’s adoption of that policy.*”

94. Earlier at paras 10 and 11 of the judgment of the Court of Appeal in *Diniz*, Collins J. referred to the following extract from the judgment of O'Donnell J. (as he then was) in *A.P. v Minister for Justice and Equality* [2019] IESC 47, at para. 1, that under s. 15 of the 1956 Act, the Minister may in his absolute discretion, grant a certificate of naturalisation to a person “*if satisfied that the applicant complies with certain statutory conditions, any of which may be waived by the Minister in circumstances themselves set out in the statute. The satisfaction of the statutory conditions (or satisfaction subject to waiver of some or all of the conditions) does not give rise to an obligation on the Minister to grant any application. Rather, satisfaction of the conditions or permitted waiver allows the Minister to exercise the absolute discretion conferred by statute as to whether or not to grant the certificate of naturalisation.*”

95. In *Diniz*, Collins J. then explained how these provisions are in fact operated, at paras 11 and 12 of the judgment of the Court of Appeal, as follows:

“(11) *The lawful exercise of the power that s. 14 of the Act confers on the respondent to grant a certificate of naturalisation is conditioned by s. 15 thereof, which allows him/her to do so where s/he is satisfied of the matters set out at sub-s. (1) thereof. Meeting those conditions is a prerequisite to the lawful exercise of the discretion to grant a certificate but confers no entitlement on an applicant to receive it.*

(12) Section 15(2) of the Act describes the conditions in sub-s. (1) as “conditions for naturalisation”. That term appears once thereafter in the Act, in s. 16(1) which provides that the respondent may, in his absolute discretion, grant an application for a certificate of naturalisation despite any non-compliance with those conditions. For the respondent to exercise the absolute discretion under s. 16(1) of the Act s/he must be satisfied that the applicant for naturalisation (a) does not comply with the conditions

for naturalisation and (b) comes within one of the cases described in that sub-section. Non-compliance with the conditions for naturalisation is thus a prerequisite for the respondent to waive the requirements of s. 15 and to grant a certificate of naturalisation under s. 16 of the Act.”

96. In the decision and recommendation dated 2nd August 2024, reference was made to the judgment of the Court of Appeal (McGovern J., Kennedy J. and Donnelly J.) in *Borta v Minister for Justice and Equality* [2019] IECA 255 (“*Borta*”) where in her judgment, Donnelly J. had reached the same conclusion as the Court had reached in *Diniz*.

97. In her judgment, Donnelly J. observed, at para. 20, that the wording of s. 15(2) in combination with s. 16 establishes in the first place that “*s.15 is the predominant pathway towards a certificate of naturalisation ... because s.15 itself sets out the conditions for naturalisation. It is when those conditions are met that the Minister is entitled in his or her absolute discretion to consider whether to grant a certificate of naturalisation ... Section 16 then goes on to deal with the situation where the conditions for naturalisation set out in s.15(1)(a)-(e) have not been met*”.

98. Consequently, *Borta* is authority for the proposition that ss. 15 and 16 of the 1956 Act are to be read and construed together (para. 15 of *Diniz*).

99. Accordingly, the authorities establish that an unchallenged finding of serious misconduct remains relevant in a subsequent naturalisation assessment. Section 15 of the 1956 Act is the primary route to naturalisation, while the ministerial waiver jurisdiction under s. 16 of the 1956 Act is reserved for exceptional cases. Read together, *Rana and Ali*, *Borta* and *Diniz* support the

approach adopted by the Minister in this case. Mr. R has, therefore, failed to demonstrate any error of law or other basis for judicial intervention, and his application for the reliefs claimed by way of judicial review must be refused.

CONCLUSION AND SUMMARY

100. As set out above, I am satisfied that the decision and recommendation dated 2nd August 2024 was lawfully made.
101. Demonstrably, the Minister was engaged in a comprehensive and balanced assessment of Mr. R's application for a certificate of naturalisation.
102. The positive factors relied upon by Mr. R, including his lengthy residence in the State, employment history, family circumstances, relationship with his Irish citizen son, absence of criminal convictions, and the extensive submissions made on his behalf, were expressly identified and weighed in the balance in the decision-making process.
103. I am further satisfied that the Minister afforded Mr. R a full opportunity to address the matters arising from the revocation of his residence card in 2017 and that the explanations advanced on his behalf were expressly considered.
104. The Minister was entitled, however, to conclude that those explanations did not sufficiently displace the adverse significance of the unchallenged finding that false and misleading documentation had been submitted in support of Mr. R's EUTR application.

105. Contrary to the submissions made on behalf of Mr. R, the decision and recommendation does not support the contention that the refusal was founded upon findings relating to a marriage of convenience or alleged absconding. Those matters formed part of the historical narrative before the Minister. The operative basis for the assessment of good character was the previous finding of the submission of false and misleading documentation, together with the Minister's assessment of the implications of this in the context of Mr. R's application for a certificate of naturalisation.
106. The recommendation clearly identifies the positive and negative factors considered, explains the weight attached to them, and sets out the reasons why the Minister was not satisfied that Mr. R met the good character requirement under s. 15(1)(b) of the 1956 Act. The Minister was entitled to reach that conclusion.
107. Insofar as reliance was placed upon s. 16 of the 1956 Act, I am satisfied that the Minister considered Mr. R's Irish associations and the request for a waiver of the statutory conditions. The reasons given for declining to exercise that discretion were fully explained after weighing the negative and positive factors.
108. I consider that Mr. R has failed to establish any basis upon which I can intervene by way of judicial review. The reliefs sought must therefore be refused.

PROPOSED ORDER

109. I shall make an order refusing the Applicant the reliefs claimed.

110. My provisional view in relation to costs is that as the Respondent has been entirely successful, he is entitled to his costs, including reserved costs, having regard to the provisions of the Legal Services Regulation Act 2015 with such costs to be adjudicated in default of agreement by the Legal Costs Adjudicator.
111. If the parties wish a different order in relation to costs, that matter can be addressed at the for mention listing on Thursday 8th October 2026 at 10:30.

CONLETH BRADLEY

21st September 2026