

THE CIRCUIT COURT

Record no: 7167/2018

DUBLIN CIRCUIT COUNTY OF THE CITY OF DUBLIN

IN THE MATTER OF SECTION 28, 30 AND 33 OF THE DEFAMATION ACT, 2009

BETWEEN

RACHEL MORAN

**Applicant
And**

GAYE DALTON

Respondent

**STATEMENT OF THE RESPONDENT PURSUANT TO DIRECTION OF HIS
HONOUR JUDGE O'CONNOR**

On 7 March 2019 during the course of this action I received conclusive sworn evidence that Rachel Moran was prostituted on Benburb Street in Dublin for a significant period of her life during the 1990s. I accept that my stated opinion that she was not regularly prostituted was factually incorrect and I formally retract it. I freely apologise for that error and any direct or indirect consequences.

I acknowledge that the same witness stated on oath that he "was aware that" Rachel Moran "also became involved in prostitution on the Southside of Dublin in the Leeson Street and Waterloo Road area".

Any accusation I have ever made of fraud was based entirely upon the factually incorrect opinion that Rachel Moran had never been regularly prostituted and I formally retract and freely apologise for the error of it.

I apologise for stating that Rachel Moran is an unscrupulous liar who has made money from a false story that she was regularly prostituted in Dublin in the 1990s and undertake never publish or restate such statement again.

I undertake never to knowingly publish factually incorrect statement about Rachel Moran.

I undertake never to publish defamatory statement about Rachel Moran.

I sincerely regret any harm or hurt caused to Rachel Moran by anything I have ever said.

I confirm my understanding of the import of this statement and the consequences if there is any untruthful statement or future publication in breach of undertakings given.

Sworn by the Said **Gaye Dalton**

This *6* day of *Nov* 2019

At *Blessington*

In the County of *Wicklow*

Before me, a commissioner for oaths/practising solicitor and whose identity has been established by a relevant document containing a photograph

Gaye Dalton

**Commissioner for
Oaths/Practising Solicitor**
