

## Bundler 1

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**From:** Martin Smith  
**Sent:** 07 November 2014 10:42  
**To:** 'Parsons, Andrew'; Belinda Crowe; 'paul.loraine@ [GRO]'; Kathryn Alexander; Jarnail Singh  
**Cc:** Rodric Williams; Brooks, Victoria; Durston, Joel  
**Subject:** RE: M052 - further disclosure [BD-4A.FID25887221]

Andy,

From a criminal perspective, we would advise as a general rule against the disclosure of any documents from a criminal file which have not previously been disclosed to the defendant during the course of the original proceedings. To do otherwise may well enable the Defendant or Second Sight to attempt to criticise the way in which the prosecution was conducted or how the prosecution policy was applied. Clearly such arguments in a public arena would be uncomfortable for POL.

We remain concerned that Second Sight are pushing for the disclosure of files and advise that a robust stance be taken by POL in relation to all such requests.

Please do not hesitate to call me to discuss this in more detail should you so wish.

Kind regards,

Martin.

Martin Smith

[GRO]

Tel: ([GRO])

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**From:** Parsons, Andrew [mailto: [GRO]]  
**Sent:** 07 November 2014 09:58

**To:** Belinda Crowe; 'paul.loraine@GRO'; Kathryn Alexander; Martin Smith; Jarnail Singh  
**Cc:** Rodric Williams; Brooks, Victoria; Durston, Joel  
**Subject:** RE: M052 - further disclosure [BD-4A.FID25887221]

Belinda

Thanks – just to confirm...

There is only one statement about the actions of the Applicant's husband – the statement from Lisa Allen and this has already been disclosed with the POIR so there's nothing we can do about this now. Noted however for other cases.

Kind regards  
Andy

**Andrew Parsons**  
Managing Associate

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**From:** Belinda Crowe [mailto:belinda.crowe@GRO]  
**Sent:** 06 November 2014 19:13  
**To:** Parsons, Andrew; 'paul.loraine@GRO'; Kathryn Alexander; 'martin.smith@GRO'; Jarnail Singh  
**Cc:** Rodric Williams; Brooks, Victoria; Durston, Joel; Belinda Crowe  
**Subject:** Re: M052 - further disclosure [BD-4A.FID25887221]

Thanks Andy

My only comment would be whether the statements about the behaviour of the applicant's family members actually add anything.

They are not in the category of docs that SS want or need and are not relevant to the conviction.

I am not sure whether the applicant has ever seen them but I do not think this information should be provided unless there is a good reason for us to provide it.

Best wishes

Belinda

**GRO**

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**From:** Parsons, Andrew [mailto:andrew.parsons@GRO]  
**Sent:** Thursday, November 06, 2014 05:12 PM  
**To:** Loraine, Paul [mailto:paul.loraine@GRO]; Kathryn Alexander; martin.smith@GRO; Jarnail Singh  
**Cc:** Belinda Crowe; Rodric Williams; Brooks, Victoria [mailto:brooks.victoria@GRO]; Durston, Joel  
**Subject:** M052 - further disclosure [BD-4A.FID25887221]

All

SS have requested disclosure of all documents from Post Office's prosecution file in the above case. We have re-reviewed the prosecution files and those "non-privileged" documents (ie. anything that is not legal advice and does not relate to internal Post Office investigation steps) that could be disclosed are attached.

Paul / Kath - I'd be grateful if you could confirm whether any of the documents to be disclosed have any material impact on our POIR.

Martin / Jarnail - I'd be grateful if you could confirm whether you have any objection to these additional documents being released to SS.

Belinda - we can then take a final view on if, what and how to release any documents to SS.

Password is the same as used for the POIR.

Kind regards  
Andy

**Andrew Parsons**  
Managing Associate

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