

DEFENCE STATEMENT

(CPIA 1996 s5(5))

To the Prosecutor: Royal Mail legal Services, 3rd Floor, 6a Eccleston Street, London,
SW1W 9LT

To the Court: Newcastle Crown Court DX 65127 Newcastle 2

Name of Accused: Peter Holmes

URN:

Charge: Theft from employer,

Date of next hearing: 17 August 2009

Name and address of solicitors for the accused: McKeag and Co
1-3 Lansdowne Terrace,
Gosforth,
Newcastle upon Tyne NE3 1HN

Date: 16 July 2009

1. The nature of the accused's defence is: As stated in my interview under caution with representatives of Royal Mail I did not steal any monies from Jesmond Post Office. I believe that either the Horizon system has on occasion been at fault and ultimately created the shortfall by creating incorrect entries. The monies entering the joint Barclays Account are proceeds from my wife's business.

I do accept that I did falsify documents to cover the discrepancies but this was only because I thought error notices would be generated and that the money was not actually missing.

2. The accused takes issue with the prosecution in relation to the following matters: I do not believe that the Royal Mail has conducted a thorough investigation and did not consider any alternative in relation to the allegation.

3. The accused takes issue with the prosecution about these matters for the following reasons: no other member of staff has been investigated. I have put forward a full explanation of the money passing through my joint Barclays Account.

4. The accused requests the disclosure of the following material as it might undermine the prosecution case or might be reasonably expected to assist the defence disclosed by this written statement:

No. of item (if listed on schedule)	Date	Description	Reason for request

File No: 01H20932/I

UFN No. 090309/003

Signed.

GRO

Dated.....30 July 2009