

**Stephen Dilley**

**From:** john.h.jones [GRO]  
**Sent:** 05 December 2005 06:48  
**To:** Stephen Dilley  
**Cc:** mandy.talbot [GRO] Tom Beezer [GRO] Julian Summerhayes; vicky.harrison [GRO] cath.oglesby [GRO] john.h.jones [GRO] stephen.hough [GRO] lesley.joyce [GRO] Tony [GRO] Utting [GRO]  
**Subject:** Re: The Post Office -v- Lee Castleton (Marine Drive Post Office, Bridlington)

Stephen

In response to questions 7&8 :-

7: The list appears to refer to balance snap shots not those for the Giro inpayments and withdrawals. These records would normally be kept within the office. If they are missing as you state then it should be possible to obtain copies of the listings that were forwarded to Girobank on the relevant days.

8: I have copied Tony Utting to advise on the route and costs for obtaining information from the Horizon system as well as previously transmitted giro inpayments and withdrawals.

Tony: I would be grateful if you could comment on the request made by Stephen (question 8) .

Many thanks

John

Area Development Manager  
 Network Change  
 Post Office Ltd  
 Sales and Service

Upper Floors, The Markets DMB, 6/16 New York Street, Leeds LS2 7DZ

Postline: [GRO] Mobile: [GRO] External E -mail: john.h.jones [GRO]

"Stephen Dilley" [GRO]  
 <cath.oglesby [GRO] pearce.com> To: <vicky.harrison [GRO]>  
 02/12/2005 10:20 <john.h.jones [GRO]>, <stephen.hough [GRO]>  
 <Tom.Beezer [GRO]> cc: <lesley.joyce [GRO]> <mandy.talbot [GRO]> "Tom Beezer"  
 <rmorgan [GRO]> "Julian Summerhayes"  
 <Julian.Summerhayes [GRO]>  
 Subject: The Post Office -v- Lee Castleton (Marine Drive Post Office, Bridlington)

Dear Vicky,

Thanks for your email of 29 November and the documents you sent to me.

To put it mildly, these documents are very interesting. It is particularly significant that Helen Hollingworth's audit stated "Cash and stock not secured during lunchtime if not on premises" "Safe left open" "Safe keys left in safe door and not secured" "travellers cheques not kept in safe"

ash not listed accurately over £500" "Foreign currency not held securely"  
"Procedures for adjusting losses and gains not adhered to." We will certainly draw this to the judge's attention.

I am preparing draft witness statement for Cath Oglesby and Helen Hollingworth. Please can you email me Helen Hollingworth's contact details (email address, telephone number and position at the Post Office).

In the meantime I attach a further copy of the list of documents that I sent to you on 24 November and would be grateful if you, Cath, John, Lesley and Stephen (or one of you) could please answer each of the points I raised in that email which for ease of reference are as follows:

1. Am I correct that it would have been Helen Hollingworth that removed any documents from the Marine Drive Post Office when she carried out the audit on 25 March 2004?
2. Cath, did you remove any documents from the Marine Drive Post Office branch? If so, do you know what those documents are?
3. Can we with certainty say that the only documents that the P.O removed from the Marine Drive branch are mentioned in the attached list?
4. I understand that the chain was as follows: Documents were removed for the audit by Helen Hollingworth, then passed to Catherine Oglesby to review and decide whether to dismiss him, then passed to John Jones to deal with the appeal against the dismissal, then to Lesley Joyce for storage and that in April 2005 Lesley Joyce sent them to the Leeds Post Office during part of a business move. Is this correct? Stephen, do you have any receipts (especially Giro receipts) in Leeds apart from those on the attached list?  
If so, please could you confirm what they are and send them to me as soon as possible?
5. On the attached list, there are receipts for "Final Balances" "Miscellaneous Transactions" "Sales Reports" "Trial Balances." Would any of these receipts contain the same information as a "Balance Snapshot?"  
Are they the same thing as a balance snapshot, but just by another name?
6. Can the P.O obtain the following documents Mr Castleton seeks:
  - (i) A full list of all the transactions carried out within the Post Office (he says that it is not good enough that management information is not available simply because the "month end has been closed down".
  - (ii) The actual audit report the P.O prepared. He says that the actual report would have been a manuscript writing document rather than a typed document.
  - (iii) P and A Reports for weeks 39-52.
  - (iv) Cash and stock counts for when Mr Castleton began trading and when he stopped being a Post Office Sub-Postmaster.
  - (v) The events log for weeks 39 to 52.
  - (vi) Transaction log.
  - (viii) The daily balance snapshots for the following dates:  
18 to 20, 22 to 23, 27, 29 to 31 December 2003  
2 to 3, 5 to 10, 12m to 13, 15 to 17, 19 to 20, 22 to 24, 26 to 27, 29 to 31 January 2004  
2 to 3, 5 to 7, 9, 19 to 21, 23 to 25 February 2005  
4 to 6, 8 March 2004 and weeks 51 to 52.
7. John, you have stated that the daily balance snapshots are irrelevant because we can physically prove from the giro deposits made by the customer at the branch that the cash declared was not that, which was physically deposited to the branch and should have been there to be accounted for.  
You will see from the attached list that there are some missing giro receipts, most noticeably for deposit and withdrawals from 11 to 31 March.  
Does this mean that for those missing weeks, we will be unable to prove that the physical cash at the P.O did not match the giro receipts?
8. John, I note that the costs of extrapolating low level data would be significant. If we wanted to, could the P.O reproduce the audit trail by reprinting it from its computer system? (In particular, could the P.O reprint the daily snapshots and the giro receipts). This could well be vital.

I look forward to hearing from you as soon as possible.

Kind regards.

Stephen Dilley  
Solicitor  
for and on behalf of Bond Pearce LLP