

Filed on behalf of the: Claimant/Part 20 Defendant  
Witness: R Simpson  
Statement: 1  
Exhibit: RS1  
Date made: 18.10.2006

**IN THE HIGH COURT OF JUSTICE**  
**QUEENS BENCH DIVISION**  
**BETWEEN:-**

**Claim No: HQ05X02706**

**POST OFFICE LIMITED**

**Claimant/Part 20 Defendant**

**-and-**

**LEE CASTLETON**

**Defendant/Part 20 Claimant**

**WITNESS STATEMENT OF RUTH SIMPSON**

**I, RUTH SIMPSON,** of First Lane Post Office, 168 First Lane, Hessle, East Yorkshire, HU13 9EU **WILL SAY AS FOLLOWS:**

1. I am currently the sub-postmistress of the First Lane Post Office, 168 First Lane, Hessle, East Yorkshire. I have been the sub-postmistress there since 7 October 1999. Before that, I was a bank manager at the Yorkshire Bank PLC having been employed by them since July 1976.
2. I make this Witness Statement from facts within my own knowledge unless otherwise stated. References to page numbers in this Witness statement are to page numbers of Exhibit "RS1" to this Witness Statement.
3. On Tuesday 23 March 2004, I was asked by Catherine Oglesby, then the Retail Line Manager, if I could take over the running of the Post Office branch at 14 South Marine Drive, Bridlington YO15 3DB **(the Marine Drive branch)** on a temporary basis. Ms Oglesby explained to me that the sub-postmaster, Mr Castleton, had been suspended following an audit that day that had shown that the Marine Drive branch had incurred substantial unauthorised losses. I agreed to take over as temporary sub-postmistress and remained in that role until Wednesday 21 April 2004.

**Assistant**

4. I brought in Lynne Cross, who I employed at the First Lane Post Office, to act as my part time assistant whilst I was the temporary sub-postmistress. Lynne worked on Mondays with me at the Marine Drive branch.
5. Mrs Castleton worked in the retail shop at Marine Drive. I believe that there were 2 or 3 other ladies who also worked in the shop. One of them was Christine Train who I believe had previously been employed by Mr Castleton to work behind the Post Office counter whilst he was the sub-postmaster.

6. Whilst Lynne Cross was working and serving customers we would each use a separate computer terminal. The Marine Drive branch operates as a shared stock unit so all the transactions done on the two computers are pooled into one shared stock and cash account. During Lynne's days off, if necessary I would log on to both computer terminals and serve customers from both of them because this helped me to deal more quickly with high volumes of packages.

### Cash Accounts

7. The Cash Accounts for the period when I worked as a sub-postmistress are at pages 1 to 30. In summary, they show that:
- TB9, p2758 - 2797
- (a) Cash Account week 52, week ended Wednesday 24 March 2004, shortage of £2.14 (page 1).  
(Although I performed the weekly balancing procedure on Wednesday 24 March 2004, I had only been working for 1 day at the Marine Drive branch at that time);
- TB9, p2758
- (b) Cash Account week 1, week ended Wednesday 31 March 2004, shortage of £101.95 (page 7)  
(This was my first full week as the temporary sub-postmistress of the Marine Drive branch. I will explain the reason for this shortage below);
- TB9, p2774
- (c) Cash Account week 2, week ended Wednesday 7 April 2004, surplus of £19.38 (page 13);
- TB9, p2780
- (d) Cash Account week 3, week ended Wednesday 14 April 2004, £10.76 shortage (page 19); and
- TB9, p2786
- (e) Cash Account week 4, week ended Wednesday 21 April 2004, £0.02 surplus (page 25).
- TB9, p2792

8. It is difficult to remember now why there was a shortage of £101.95 for the week ended 31 March 2004, but I think this was because my assistant may have left something in the stack and erroneously paid out a pension twice. (When a customer comes to the Post Office counter to do a transaction, the person serving them enters the product type and quantity the customer wishes to purchase by using the touch sensitive screen or the keyboard. Each customer's transactions are recorded in a list called a "stack". Once the customer has been served, the stack is cleared).

### The two computers

9. I have been asked to confirm whether I experienced certain problems with the Horizon computer terminals whilst I was the temporary sub-postmistress at the Marine Drive branch. Each day, I checked that the branch paperwork (such as cheques, counterfoils and giro slips) agreed with the reports that were printed from the computer and sent to the processing centre. I remember there were no problems other than the usual trivial problems you tend to experience with computers on occasions. In particular:

- (a) I did not come across instances where the 2 computer terminals did not appear to communicate with each other.
- (b) On occasions when the touch sensitive computer screen is dirty, it will not accept commands and you have to use the keyboard to enter information instead. However, the screen did not freeze whilst I was sub-postmistress at the Marine Drive branch.
- (c) Usually I prepared the weekly Cash Account on Thursday mornings before opening the Post Office counter. However, on one such morning I had to reboot the computer because

screen went blank. I am reminded from reviewing the Cash Account dated Wednesday 31 March 2004 (pages 7 to 12) that this took place on Thursday 1 April 2004, because as a result of the reboot, I did not get around to completing the weekly Cash Account until lunchtime on that day. I am not sure why the screen went blank that morning, but think this might have been because there was a power failure.

- (d) I do not recall the card swipe device failing completely to work whilst I worked at the Marine Drive branch. This may have happened once or twice during my 7 years as a sub-postmistress. On occasions cards may become damaged or dirty and may need to be cleaned or swiped twice.
- (e) There were no instances of the Overnight Cash Holding (**ONCH**) figures doubling up whilst I was at the Marine Drive branch. I believe that the only time this could happen is through user error, if the operator mistakenly inputs the same information twice.
- (f) There were no occasions when I entered transactions on the system that were then lost.

10. I have been asked whether any of the computer equipment was changed whilst I was at the Marine Drive branch. I do not remember any equipment being changed at the time.

#### **National Lottery cash**

11. There were two things at the Marine Drive branch that struck me as being strange at the time. One related to the National Lottery cash. The National Lottery terminal at the Marine Drive branch is in the shop rather than behind the Post Office counter. As the shop stayed open later than the Post Office counter, it would continue to sell lottery tickets and this meant that before the opening of the Post Office business the next day, I would use the shop till receipts to input details of the lottery transactions into the Horizon computer terminal. When I came into the branch each morning, I would find the lottery cash that the shop had received overnight left in a bag just under the Post Office counter screen together with the lottery till receipt. I was therefore concerned that the lottery cash was being left unattended, because it was not secure and a customer could have taken it. On one occasion (I cannot recall precisely when), the lottery printout (showing about £50 worth of sales) was there but there was no lottery cash. I therefore asked Mr Castleton to make this amount good from the shop, which he did. I also asked for the lottery cash to be handed to me personally.

#### **Car auction deposits**

12. A car auction in Bridlington would deposit thousands of pounds of cash each week into their girobank account. (Typically each deposit was of £8,000 or £9,000). What was unusual is that I tended to find the cash in a carrier bag had been thrown under the Post Office counter door when I arrived to open the Post Office counter in the morning. The Post Office counter door was old and there was about a foot gap between the bottom of the door and the ground. Given the large gap under the Post Office counter door, it was a very large amount of cash to leave in an insecure place. There was no covering note stating how much cash there was and either I or my assistant Lynne Cross had to count it and to pay it into the customer's account. I think that the paying in book may have been kept permanently behind the Post Office counter rather than being completed by the customer. I do not

recall meeting this customer, but I believe I contacted the customer to confirm the amount of the deposit and to request a cash breakdown for future deposits. I also asked Mr and Mrs Castleton to ensure the carrier bag was handed to me if left by the customer prior to my arrival in the morning.

**21 April 2004**

13. Due to other commitments, I finished working as temporary sub-postmistress on Wednesday 21 April 2004. Mr Greg Booth took over as temporary sub-postmaster after me and he came to meet me on 21 April 2004 at the Marine Drive branch so that I could handover to him. I was not involved with the Marine Drive branch any further afterwards.

I believe that the facts stated in this witness statement are true.

Signed **GRO**  
RUTH SIMPSON

Date 19/10/06

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**WITNESS STATEMENT OF RUTH SIMPSON**

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