

THE QUEEN

v

SEEMA MISRA

TAKE NOTICE that, in addition to the evidence before the Magistrates' Court, further evidence,
the effect of which is set out herein, may be given at the trial.

DATED this 12th day of April 2010

To: the Solicitors acting
for the Defendant
and to the Court

Signed J SINGH

for General Counsel to Royal Mail Group Limited
Legal Services
6a Eccleston Street
LONDON
SW1W 9LT

Witness Statement

(CJ Act 1967, s9; MC Act 1980, ss 5A(3)(a)
and 5B, MC Rules 1981, r 70)



Statement of Andrew Paul Dunks

Age if under 18 over 18 (If over 18 insert 'over 18')

This statement (consisting of 5 pages signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe true.

Dated the 29th day of March 2010

Signature

GRO

Further to my statement of 24th June 2009, I would now like to add the following.

I have been employed by Fujitsu Services (Fujitsu), Post Office Account, since 11 March 2002 as an IT Security Analyst where I am involved in IT Security for the Post Office Account. I have a working knowledge of the computer system known as Horizon, which is a computerised accounting system used by Post Office Ltd. I am authorised by Fujitsu to undertake extractions of audit data held on the Horizon system and to obtain information regarding system transaction information processed on the Horizon system.

I make this Witness Statement from facts within my own knowledge unless otherwise stated. Any records to which I refer in my statement form part of the records relating to the business of Fujitsu. These were compiled during the ordinary course of business from information supplied by persons who have or may reasonably be supposed to have personal knowledge of the matter dealt with in the information supplied, but are unlikely to have any recollection of the information or cannot be traced, since the nature of the helpdesk involves many engineers all at differing levels and any number could be involved in a particular call. As part of my duties, I have access to these records, but I was not involved with any of the technical aspects of these calls. This area is not my particular area of expertise and I make this witness statement simply to help clarify the call logs for the benefit of the Court.

Signature

GRO

Signature witnessed by

GRO

Witness Statement

(CJ Act 1967, s9; MC Act 1980, ss 5A(3)(a) and 5B, MC Rules 1981, r 70)

Continuation of statement of Andy Dunks

An important element of the support provided to sub-postmasters and Counter Clerks is the Horizon System Helpdesk (HSH). The HSH is the Horizon user's first 'port of call' in the event of their experiencing a problem with the Horizon system or requiring advice and guidance. If the system were to malfunction, upon discovery the Horizon users (i.e. the sub-postmaster or counter clerk) would raise a call to the HSH seeking clarification or advice. HSH is a service run by Fujitsu Services for the Post Office. I have been asked to provide information pertaining to the working condition of the Horizon system. The following information constitutes the calls logged by HSH recorded during the period **January 1st 2005 to June 30th 2005** for the **West Byfleet** Post Office – Branch Code **126023**.

I have reviewed the HSH calls pertaining to the **West Byfleet** branch during the period **January 1st 2005 to June 30th 2005**. There were **13** calls from branch Code **126023** to the HSH. All the calls are of a routine nature and do not fall outside the normal working parameters of the system or would affect the working order of the counters.

Call reference details and an overview of each call are given in date order below:

There are a many abbreviations that the HSH use in their call details, here are many explained:

NBSC - Network Business Support Centre

PM – Post Master

CC – Counter Clerk

Bop – Back office printer

CP- Counter printer

ADSL - Asymmetric Digital Subscriber Line (network connection)

PWWDCR - Wait While Desktop Connects To Riposte

BU – Base Unit (counter)

PMMC - Postmaster Memory Card

Ithaca – make of printer

MLP – mail label print

Signature

GRO

CS011A

Signature witnessed by

GRO

Version 4.0 07/06

Witness Statement

(CJ Act 1967, s9; MC Act 1980, ss 5A(3)(a) and 5B, MC Rules 1981, r 70)

Continuation of statement of Andy Dunks

OSP – One Shot Password
EOD – End of Day
BCR - Bar Code Reader
PMHTCC – Post master happy to close call
SSC - System Support Centre 3rd/4th line support

1. Mon 10 January 2005 10:10 Call E-0501100701

Engineer to swap pinpad ALWAYS even if it appears to be working due to HCP reporting as faulty. NODE ID : 3

Resolution: Thu 10 February 2005 08:19

Call Closed by Emma Bradley: call closed

Outcome

PinPad replaced by engineer.

2. Wed 12 January 2005 16:39 Call E-0501121046

Pm reports bop very hot and not feeding paper at all

Resolution: Wed 12 January 2005 16:42

Call Close by Susanna Craske: Pm reports bop not feeding and very hot. advised Pm to order new image drum. ref offered **Outcome**

Advised to replace printer part.

3. Tue 01 February 2005 09:33 Call E-0502010226

Pm states cp receipt jams

Resolution: Tue 01 February 2005 09:37

Call Close by Philippa Sparrow: Pm states cp receipt jams. Adv clean sensor. pm states this has worked. pm htcc

Outcome

Advised to clean printer sensor.

4. Tue 08 February 2005 16:37 Call E-0502080765

Caller states that CP is not printing labels.

Resolution: Wed 09 February 2005 18:19

Call Close by Sarah Hill: ** [No Remark entered.] Call closure code of FAILURE and repair code 821

Outcome

Printer replaced..

Signature

GRO

CS011A

Signature witnessed by

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(CJ Act 1967, s9; MC Act 1980, ss 5A(3)(a) and 5B, MC Rules 1981, r 70)

Continuation of statement of Andy Dunks

5. Thu 10 February 2005 15:06 Call E-0502100784

clerk states that she had a replacement cp on node 1 but is still having problems with the mail labels

Resolution: Thu 10 February 2005 15:24

Call Close by Navdeep Uppal: clerk called as mail labels were jamming, advised clerk to perform a factory reset, cp now operational call ref given, pmhtcc

Outcome

Advised to reset printer.

6. Thu 10 February 2005 15:27 Call E-0502100802

pm states that mail labels get jammed in cp

Resolution: Thu 10 February 2005 15:38

Call Close by Navdeep Uppal: pm called as mail labels are jamming, asked clerk to perform factory reset, pmhtcc call ref given, cp now operational

Outcome

Advised to reset printer.

7. Tue 15 February 2005 16:41 Call E-0502150867

Pm states cp keeps jamming labels, labels get stuck

Resolution: Wed 16 February 2005 18:17

Call Close by Jordan Edgar: ** [No Remark entered.] Call closure code of FAILURE and repair code 821

Outcome

Printer replaced.

8. Tue 22 March 2005 12:26 Call E-0503220459

pm states that the counter printer is not printing labels comes up with a red flashing light.

Resolution: Tue 22 March 2005 12:38

Call Close by Simon Hopperton: pm states that the counter printer is not printing labels comes up with a red flashing light. advised pm to do a factory reset. pm states that the printer is now working and is happy to close call.

Outcome

Advised to reset printer.

9. Tue 22 March 2005 15:26 Call E-0503220598

pm states cp is not printing postage labels

Resolution: Wed 23 March 2005 08:05

Call Close by Martin Hammond: replaced printer Call closure code of and repair code 821

Outcome

Printer replaced.

Signature

GRO

Signature witnessed by

GRO

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Witness Statement

(CJ Act 1967, s9; MC Act 1980, ss 5A(3)(a) and 5B, MC Rules 1981, r 70)

Continuation of statement of Andy Dunks

10. Tue 29 March 2005 08:50 Call E-0503290102

pm states they have the error please wait while desktop connects to riposte

Resolution: Tue 29 March 2005 08:53

Call Close by Adam Goldstein: pm states they have the error please wait while desktop connects to riposte ref no given

Outcome

PM advised to reboot counter..

11. Tue 29 March 2005 17:09 Call E-0503290872

caller states that the cp on 2 is not feeding correctly

Resolution: Wed 30 March 2005 13:15

Call Close by Sarah Hill: Engineer replaced the counter printer. Call closure code of and repair code 821

Outcome

Printer replaced.

12. Fri 01 April 2005 08:02 Call E-0504010050

PM states bop is not printing and the message 'unable to retrieve status of this device' appears.

Resolution: Fri 01 April 2005 08:11

Call Close by Elspeth Neilson: PM reporting bop not printing and red light flashing. Deleted print Q and advised to change toner. Ref given.

Outcome

Advised to replace printer part.

13. Fri 01 April 2005 08:49 Call E-0504010080

Pm states that the red light is still flashing and he has just changed the toner but the printer is still printing

Resolution: Fri 01 April 2005 08:52

Call Close by Sarah Dawe: Pm states that the red light is still flashing and he has just changed the toner but the printer is still printing advised pm if its printing everything will be ok and if he has any problems to call back pmhtcc ref offered

Outcome

Advised and guidance given.

Signature

CS011A

GRO

Signature witnessed by

GRO

Version 4.0 07/06

Witness Statement

(CJ Act 1967, s9; MC Act 1980, ss 5A(3)(a)~
and 5B, MC Rules 1981, r 70)



Statement of Andrew Paul Dunks

Age if under 18 over 18 (If over 18 insert 'over 18')

This statement (consisting of 1 page signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe true.

Dated the 30th day of March 2010

Signature

GRO

Further to my statement dated 29th March 2010, I provide a CD AD/01 containing details of all calls logged from West Byfleet Post Office to the Horizon System Helpdesk (HSH) between January 1st 2005 to December 31st 2009.

Signature

GRO

Signature witnessed by

GRO

Witness Statement

(CJ Act 1967, s9; MC Act 1980, ss 5A(3)(a)
and 5B, MC Rules 1981, r 70)



Statement of Ian Venables

Age if under 18 Over 18 (If over 18 insert 'over 18')

This statement (consisting of 2 pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe true.

Dated the 30 day of March 2010

Signature

GRO

I have been employed by Fujitsu Services, Post Office Account since May 2005. I perform the role of Service Delivery Manager and am responsible for service delivery of all Post Office change. I have working knowledge of the computer system known as Horizon, which is a computerised accounting system used by Post Office Ltd and knowledge of the processes used when Horizon kit is uplifted from closing Post Office Branches.

Horizon's documented procedures stipulate how the Horizon System operates, and while I am not involved with any of the technical aspects of the Horizon System, these documented processes allow me to provide a general overview.

The serial number of the Gateway PC base unit at West Byfleet Branch (FAD Code 126023) is YBSH011567 and I have documentation from Triage Services confirming repair and software reload of this unit prior to its deployment to the West Byfleet Branch.

On arrival at Triage Services on the 23rd of January 2008 base unit YBSH011567 was subjected to a standard clean, test, and application reinstallation as per standard process, Triage Services state that no malfunctions were found and as a result no repairs were carried out to this unit and it was placed in storage awaiting redeployment.

All relevant data is held on Triages Services "MAX" system database.

The base unit with serial number YBSH011567 was finally redeployed to West Byfleet Office, Branch Code 126023 on the 4th February 2008 and since its installation the Branch Manager at this address has logged 29 Service Calls with the Fujitsu Services Horizon Help Desk. Once redeployment has taken place all previous location history is overwritten on the Fujitsu

Signature

GRO

Signature witnessed by

GRO

Witness Statement

(CJ Act 1967, s9; MC Act 1980, ss 5A(3)(a) and 5B, MC Rules 1981, r 70)

Continuation of statement of Ian Venables

systems.

At the time of writing this statement the Gateway PC, serial number YBSH011567 is still on site at the West Byfleet Branch 237405 and in the absence of service calls relative to this unit the author believes it to be functioning correctly.

Any records to which I refer in my statement form part of the records relating to the business of Fujitsu Services. These were compiled during the ordinary course of business from information supplied by persons who have, or may reasonably be supposed to have, personal knowledge of the matter dealt with in the information supplied, but are unlikely to have any recollection of the information or cannot be traced. As part of my duties, I have access to these records.

Signature

GRO

Signature witnessed by

GRO

GUILDFORD CROWN COURT

THE QUEEN

v

SEEMA MISRA

NOTICE OF ADDITIONAL EVIDENCE

General Counsel to Royal Mail Group Limited
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