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For the attention of Mr I Henderson  
Second Sight Support Services Ltd  
Tythe Farm  
Maugersbury  
Cheltenham  
Gloucestershire  
GL54 1HR

By post and e-mail to: **GRO**

19<sup>th</sup> June 2015

Dear Ian

**M035 – Josephine Hamilton**

I refer to your email of 3 June 2015 and write to ensure that there is clarity around the status of Post Office's security reports.

Security reports, like the one you have referred to in the above case, are privileged documents for many reasons but principally because they are the basis on which Post Office investigators seek legal advice on the merits of and possible approaches to a possible prosecution. As can be seen in the penultimate paragraph of the security report for Ms Hamilton, the Post Office Investigation Manager was seeking legal advice from the Post Office Criminal Law Team.

All security reports of this nature are therefore privileged and subject to your undertaking not to disclose them or their contents. It is highly regrettable that you only chose to refer to Ms Hamilton's security report in your Final CRR, and not at the Draft stage which would have enabled Post Office to object to the inappropriate disclosure of its privileged material.

For the avoidance of doubt, Post Office has not improperly withheld any material from Second Sight and has carefully considered any application of privilege to any documents. In any event, any assessment of the basis on which Post Office may have prosecuted an individual is beyond Second Sight's scope of work as you are not experts in matters of criminal law and procedure.

Yours sincerely

**GRO**

**Rodric Williams**  
Solicitor  
For and on behalf of Post Office Limited