
From: Mark R Davies[/O=MMS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=MARK R DAVIESA80D7269-659B-41D0-9C80-68D9DE4FA7C5D38]
Sent: Mon 15/12/2014 2:53:28 PM (UTC)
To: Reid, Tom [GRO]
Cc: BARTY, Susan [GRO]; Helmer, Stuart [GRO]; [GRO]; Rodric Williams [GRO]; Melanie Corfield [GRO]; Ruth X Barker [GRO] Tom Wechsler [GRO]; Patrick Bourke [GRO]
Subject: Re: Post Office interview

Thanks Tom.

In short the BBC are effectively accusing us of:

- breaching PACE
- wilfully allowing miscarriages of justice

Surely this falls into defamation territory? It smacks of the worst kind of journalism: get a taking head to say something with no evidence, we reject it, they broadcast both sides and yet the damage to us as a party is significant.

Grateful for urgent advice.

Mark

Mark Davies
Communications and Corporate Affairs Director
Mobile: [GRO]

Sent from my iPhone

On 15 Dec 2014, at 14:31, "Reid, Tom" [GRO] wrote:

Dear Mark

We had no further amendments, so we have sent the letter out. I attach a copy for your records. We will also consider the point on the allegation of failure to follow legal procedures and come back to you.

Kind regards

Tom

**Tom Reid
Associate**

T [GRO]
F [GRO]
E [GRO]

<image001.jpg>

CMS Cameron McKenna LLP | Mitre House, 160 Aldersgate Street | London EC1A 4DD | United Kingdom

www.cms-cmck.com
www.law-now.com

From: Mark R Davies [GRO]
Sent: 15 December 2014 13:49
To: Reid, Tom
Cc: BARTY, Susan; Helmer, Stuart; Rodric Williams; Melanie Corfield; Ruth X Barker
Subject: RE: Post Office interview

Hi Tom

Thanks for this.

I have made a few changes in the attached. If you and copied colleagues are content, I am and would like it to go asap.

On the wider defamation point: my concern is that the BBC suggests in its programme, without evidence, that we do not follow legal procedures correctly. This strikes me as a very serious allegation, which would have the potential to lower our reputation with third parties, unfairly. I am not, however, up to date with media law developments.

Perhaps it is an issue for a separate communication to the BBC as a warning shot?

M

Mark Davies | Communications and Corporate Affairs Director

<image002.png>

1st Floor, Banner Wing, 148 Old Street, London, EC1V 9HQ

[GRO] Postline [GRO]

[GRO] Mobex [GRO]

[GRO]

<image003.jpg>

From: Reid, Tom [GRO]
Sent: 15 December 2014 13:34
To: Mark R Davies
Cc: BARTY, Susan; Helmer, Stuart; Rodric Williams
Subject: FW: Post Office interview

Dear Mark

Susan is away from the office today so she has asked me to send this out. However we have been in close touch with her by phone and email this morning and had her input on this letter.

With regard to the implications of the BBC making these allegations, the recent change in law has made it much more challenging for a business to succeed in a defamation action. In particular, it can be difficult to show the serious financial harm that is required. This letter therefore does not refer expressly to defamation, and instead emphasises concepts from the BBC editorial guidelines such as the right to reply and a fair and appropriate deadline for a response. However, do let us know if you would like us to consider this further.

Kind regards

Tom

Tom Reid
Associate

T [GRO]
F [GRO]
E [GRO]

<image001.jpg>

CMS Cameron McKenna LLP | Mitre House, 160 Aldersgate Street | London EC1A 4DD | United Kingdom

www.cms-cmck.com
www.law-now.com

From: Mark R Davies
Sent: 15 December 2014 10:30
To: Susan.BARTY [GRO]
Cc: Rodric Williams; Melanie Corfield; Ruth X Barker; Chris Aujard
Subject: Fwd: Post Office interview

Hi Susan

I'm sending you below the long email chain I have had with the BBC over the weekend. As discussed we would now like to send a legal letter citing Ofcom guidelines. I think we are in a very reasonable position.

Given the questions posed by the BBC (which are at the end of this letter) I would very much welcome your view also as to the implications of the BBC making these allegations - my own media law view is that they are stepping into dangerous territory if some of these allegations are made.

Mark

Mark Davies
Communications and Corporate Affairs Director
Mobile: [GRO]

Sent from my iPad
Begin forwarded message:

From: Mark R Davies [GRO]
Date: 15 December 2014 10:27:11 GMT
To: Ingrid Kelly [GRO]
Cc: Nick Wallis [GRO], Jane French [GRO],
Melanie Corfield [GRO], Ruth X Barker
[GRO]
Subject: Re: Post Office interview

Hi Ingrid

I am aware of the complexities of making a programme. I remain perplexed, however, as to why you require a further 2.5 days after today to do so and are not prepared to incorporate a Post Office interview in that time.

Our spokesperson, as I have said, is involved in Mediation Scheme work all day today and tomorrow. I am not prepared to jeopardise that work to accommodate your unreasonable schedule.

Best wishes

Mark

Mark Davies
Communications and Corporate Affairs Director
Mobile: [GRO]

Sent from my iPad
On 15 Dec 2014, at 09:34, "Ingrid Kelly" [GRO] wrote:

Dear Mark,

I am sure you are aware that making a programme involves far more than merely filming. As I have said it is not practically possible for the team to accommodate an interview after today.

As you maintain your designated interviewee cannot possibly accommodate an interview at any point today – despite our offer to be available either before or after their normal working day (though the former is clearly now redundant) then we too are in a difficult position.

If this person is the only person within the Post Office who is appropriate for interview, then I'd be grateful if you could ask them to consider being interviewed at the end of their working day today.

Failing that, then as I've said, we will fairly reflect the post office's position within the film whether or not you are on the sofa.

Regards

Ingrid

From: Mark R Davies [GRO]
Sent: 15 December 2014 08:58
To: Ingrid Kelly
Cc: Nick Wallis; Jane French; Melanie Corfield; Ruth X Barker
Subject: Re: Post Office interview

Dear Ingrid

You have singularly failed to set out why you need two full days to prepare your film and why the interview you requested must happen today. This is not reasonable.

We stand ready to take part yet you refuse to budge from a self imposed deadline and are unable to explain why you require more than 48 hours to prepare a film, having presumably shot most of it, including several interviews designed to traduce the Post Office's position. I note from his Twitter feed that Nick was filming for 10 hours on Thursday.

While we would like to appear in your film we reserve the right to ensure that, given the range of issues you are raising, we make the most suitable person available. She is not available today due to work on the Scheme. I am therefore stuck - do I place the Scheme and the interests of applicants ahead of your request? The answer here is obvious.

We will send you a statement and a very full document setting out the answers to the questions posed by Mr Wallis. I would request that given your refusal to accommodate a full and proper Post Office interview the statement is used in full.

We did indeed suggest that we have a slot on your sofa. I didn't imagine for a moment this would mean a scenario where our points would not be reflected through interview in your film. It provides no real opportunity for the Post Office to respond to the serious and unfounded allegations you plan to make.

Best wishes

Mark
Mark Davies
Communications and Corporate Affairs Director
Mobile: [REDACTED] GRO

Sent from my iPhone

On 14 Dec 2014, at 22:38, "Ingrid Kelly" [REDACTED] GRO
wrote:

As i have said unfortunately the team cannot accommodate a filmed interview beyond monday. Far from asking you to prioritise us over the scheme, we've said we can accommodate the interview as early or late tomorrow as necessary to suit your allotted person so as not to interfere with their working day. If neither you nor any other spokesperson can be available then, as ever, we can accept a written response. Appearing live in the studio on the sofa after the film was your suggestion which we were happy to accommodate. Should you no longer wish to do that then while it is disappointing, it is your decision. The offer remains open.

Regards

Ingrid

On 14 Dec 2014, at 21:19, "Mark R Davies"

GRO

wrote:

Hi Ingrid

Thanks for this. I am struggling to understand why it "needs" to be on Monday, particularly as, for the reasons set out in my earlier emails, we are unable to provide a suitable spokesperson on Monday due to competing business priorities related to the Scheme and applicants. It would be ironic indeed if we were to relegate these responsibilities.

As I've also said, and as Nick has acknowledged, your sofa slot will not provide a suitable forum for the Post Office to respond to the very serious and unfounded allegations you plan to make in what will now inevitably be a film which does not present a full and rounded picture. It would be extremely unfair to suggest as you do now that a minute or two in the studio will provide suitable opportunity for the Post Office's position to be fairly reflected.

Given the circumstances therefore we could not appear in the studio.

I ask you again to please reconsider your refusal to accept a Post Office spokesperson for your film on a more reasonable deadline.

Many thanks

Mark
Mark Davies
Communications and Corporate Affairs
Director
Mobile: GRO

Sent from my iPhone

On 14 Dec 2014, at 17:53, "Ingrid Kelly"

GRO

wrote:

Dear Mark,

As I've said if you or a colleague wish to be interviewed for the film then it needs to be on Monday. You may feel late Tuesday is

reasonable but as i've made plain from the outset, beyond Monday is not possible for us. As i've also said any monday interview can be as early or as late as you wish.

Should neither you nor your colleague be available for a filmed interview tomorrow then we are content with a statement for the film as we had last week. As things stand, you yourself will be on the sofa on wednesday and able to reflect the Post Office's position.

Regards

Ingrid

On 14 Dec 2014, at 10:28, "Mark R Davies"

GRO

wrote:

Hi Ingrid

It isn't about your schedule disappointing us at all, it is about our reasonable offer, repeated again here, to provide an interview for your programme and your reluctance to accommodate us in a reasonable timescale.

It is a little baffling that you are not prepared to allow us reasonable time to respond with an interview. While I appreciate the demands of filming, editing and clearing at your end, we are able to offer an interview for your programme a full 24 hours before

you broadcast. That seems eminently reasonable to me and I am sure it is logistically achievable.

Without Post Office input by interview into the film and the opportunity to respond to the detailed points and allegations made it will clearly be impossible, as Nick has accepted, to respond fully in the studio in a two or three minute slot. I do not think in those circumstances we could appear in the studio: the film will be very skewed without our voice in it.

Given the work my colleague must undertake on behalf of the Scheme and applicants this week, I will have to check with her, but I think it might be possible to conduct an interview in the late afternoon on Tuesday.

I think she will be out of London but I am sure this can be overcome. Do let me know what time would be suitable and I will confirm a location.

Best wishes

Mark
Mark Davies
Communications and
Corporate Affairs
Director
Mobile: GRO
GRO

Sent from my iPhone
On 13 Dec 2014, at
17:40, "Ingrid Kelly"

GRO
GRO wrote:

Hi Mark,

I'm sorry
if our
schedule
disappoints
and
inconveniences
you
or the
post
office but
we won't
be
postponing.
You
have the
allegations
and our
schedule.
You can
respond
within the
film by a
statement
if no one
appropriate
is
available
for
interview
on
Monday -
and of
course
you
yourself
will be

respondin
g on the
sofa after
the item
airs.

Regards

Ingrid
On 13
Dec
2014, at
17:07,
"Mark R
Davies"



wrote:

Hi Ingrid

That is very disappointing. To stress we would like to offer a spokesperson for your programme's pre-recorded film and are able to but not in the timetable you suggest.

Our position is very reasonable. I assume the programme will return after Christmas. What is the urgent reason for being unable to give us the time we need?

You plan to make a series of complex and very serious allegations about Post Office Ltd, all of which can be answered in detail. I do not understand why your timescales are such that you cannot accommodate an interview for a film 24 hours before broadcast. You are asking for 48 hours for your own internal processes.

Nick has himself suggested that a sofa slot would not really give us the opportunity to answer the very complex range of allegations he is making. We agree and clearly would be unable to take part in the studio if our position is not reflected in the pre-recorded film.

It cannot be fair to feature a series of other interviews in the film, all of which were presumably filmed last week in good time for your deadlines, without giving Post Office, which is very firm in its position, the opportunity to respond. There are two sides to every story, as you know.

I would like to ask you to reconsider your position please.

Best wishes
Mark
Mark Davies
Communications and Corporate Affairs Director
Mobile: [GRO]

Sent from my iPhone
On 13 Dec 2014, at 12:24, "Ingrid Kelly"
[GRO] wrote:

I'm afraid not. The programme is off air for a fortnight and will run on weds. If you really can't do an pre recorded interview on monday then as you'll be on the sofa on weds, you'll be able to respond then.

Regards

Ingrid
On 13 Dec 2014, at 12:15, "Mark R Davies"
[GRO] wrote:

Hi Ingrid

Many thanks for this.

In that case please can I formally request that the item is held until it is possible for the Post Office to respond on film? There is no urgency or need to broadcast this item on Wednesday, especially as the Mediation Scheme is continuing. Due to pressing and competing business priorities related to the mediation scheme and involving applicants to it, we cannot provide suitable representation until late Tuesday afternoon at the earliest.

I appreciate your own legal and other processes - you will appreciate our own.

I am formally offering you this interview with a senior manager who leads on the issues you are discussing and think it is reasonable for the Post Office to have the opportunity to put forward its position in a reasonable timescale.

We also stand ready to put a spokesperson up live in the studio.

Best wishes

Mark

Mark Davies
Communications and Corporate Affairs
Director
Mobile: [GRO]

Sent from my iPhone
On 13 Dec 2014, at 09:48, "Ingrid Kelly"
[GRO] wrote:

Hi Mark,
I'm afraid the practicalities mean a filmed interview wd need to be done on monday to be incorporated into the piece. The lawyers and editorial advisory teams all need to take their time checking the Item so it's a rather cumbersome process. The interview can be as early or as late as suits but it does need to be monday i'm afraid.

best

ingrid
On 13 Dec 2014, at 09:29, "Mark R Davies"
[GRO]
wrote:

Hi Nick

Many thanks for your email.

As you will appreciate you have raised a broad range of issues which range across legal, IT and network support. We are very keen to be able to respond to all these issues in detail, particularly as

there are some really
fundamental points raised in
your questions.

To that end we are working
to ensure that we can provide
you with the best possible
response. As mentioned in my
previous email, as well as
input from the suppliers of
our IT system and a legal
view on the serious points
you raise, we need (and I
think this is reasonable) to
provide you with a
spokesperson who can speak
across this range of issues.

We are dealing however on
Monday and Tuesday with
mediation scheme matters
which relate to applicants. So
we can absolutely be available
later on Tuesday or on
Wednesday morning.

I do appreciate the challenges
you have around filming and
editing of course but I am
sure you will appreciate the
challenges from our side as
well.

I suggest we speak first thing
Monday morning and
hopefully you will be able to
come back to me on the
timescale above and I will be
able to update you too on
where we are - please be
assured we will do everything
we can to ensure we give you
the opportunity to interview
the Post Office on these
important matters.

Best wishes

Mark

Mark Davies
Communications and

Corporate Affairs Director
Mobile: [REDACTED] GRO

Sent from my iPhone
On 12 Dec 2014, at 20:43,
"Nick Wallis"

[REDACTED] GRO
wrote:

Hi Mark

Thanks for your email. I am delighted you are inclined to offer studio live *and* pre-recorded filmed interviews.

As Ingrid (cc'd) has confirmed the planned transmission date for both would be Wed 17 Dec, to coincide with the planned Westminster Hall adjournment debate on the Post Office called by James Arbuthnot MP.

As Jane (cc'd) explained to you on the phone and as I am sure you understand, we need to set a time for the pre-recorded interview well in advance of the planned transmission date as the interview will have to be edited and go through all the usual processes before being delivered to the One Show for broadcast. It is in no one's interest to rush this.

As Ingrid may have mentioned (and I defer to her on exactly how things may be happening on Wednesday), any studio guest you nominate will most likely be allotted around three minutes interview time, but with Victoria Wood, Michael Ball, a children's choir already booked on Wednesday and the unpredictability of a live

studio environment, the interview might get curtailed, or the discussion itself might veer off topic, despite everyone's best efforts.

Could I therefore urge you to fix up a date and time as soon as possible to film a pre-recorded interview where we can ask you, and give you the opportunity to answer, a series of questions on the subjects raised below in a calm and controlled environment.

The interview will, of course, be edited, but we will be scrupulous in our duty of fairness towards the interviewee and the answers they give. Furthermore, whether either, both or no proposed interviews end up being broadcast, we will be taking all reasonable steps to ensure the Post Office's perspective on the serious matters below is properly represented.

I hope all that makes sense. Just to ensure you are clear on the internal division of labour surrounding the two proposed interview opportunities, Ingrid will deal with you re the arrangements re the possible live interview on the One Show sofa, whilst Jane and I can work with you to arrange a pre-recorded interview at a location of your convenience.

I hope to hear from you soon re a proposed pre-recorded interview location/date/time and interviewee. I am happy

to liaise with you over
the weekend to book it in
in good time.

Yours,

Nick

From: Mark R Davies

GRO

Sent: 12 December 2014
18:47

To: Ingrid Kelly

Cc: Jane French; Nick
Wallis; Melanie Corfield;
Ruth X Barker

Subject: Re: Post Office
interview

Ah - thanks Ingrid.
That does give us more
time. Many thanks for
clarifying.

Best wishes

Mark

Mark Davies

Communications and
Corporate Affairs

Director

Mobile: **GRO**

Sent from my iPhone

On 12 Dec 2014, at
18:34, "Ingrid Kelly"

<**GRO**>

GRO wrote:

No Mark that's
my mistake in the
voicemail. as per
my text - it is
weds! Apologies
all. Ingrid

On 12 Dec 2014,
at 18:32, "Mark
R Davies"

GRO

wrote:

Dear Jane,

Thank you
for your
time today.
Just to
follow up
my
previous
email, I
can
confirm
that the
Post Office
would
welcome
the
opportunit
y to
respond in
your film
and in the
studio to
the very
serious and
detailed
allegations
being
made in
the email
we
received
from Nick
Wallis
(copied
below for
ease of
reference).

I
understand
from
Ingrid
Kelly that
you are
now
planning to
air this
item on
Monday
evening.
This
comes as a
surprise as

you
indicated
Tuesday or
Wednesda
y when we
spoke
earlier.

Either
way, given
the very
serious
nature of
the
allegations
being
made, and
the
requiremen
t to give us
reasonable
time to
respond,
we do not
believe we
can meet
your
deadline
of noon on
Monday
for an
interview
to be
conducted.

We are
inclined to
offer an
interview
but our
spokespers
on, who is
leading the
investigati
ons
process on
the matters
you
reference,
is involved
in
mediation

scheme
work on
Monday
and
Tuesday.
I am sure
you will
recognise
that this
work,
which invo
lves
scheme
applicants,
is very
important.

She could
be
available
later in the
week and
as she is
best placed
to speak
for the
business
on the
complex
range of
issues you
have
raised, I
believe it is
reasonable
to ask you
to hold off
on
broadcasti
ng your
item until
such time
as we are
able to
respond
properly.

Moreover,
our
spokespers
on is able
to respond

to the
specific
issues you
raise in a
way no
other
colleague in
our
business
can given
her role
and first
hand
knowledge
of the
specifics Nick
has
referred
to. I would
also stress
again,
however,
that Post
Office
cannot
comment
on
individual
cases.

The
Ofcom
guidelines
on matters
like this
make clear
that we
should be
given
reasonable
time to
consider
and make
our
response
to requests
such as
this. What
constitutes
a
reasonable
time must

surely take
the
urgency of
a situation
into
account.
There is no
urgency
here,
especially
in the light
of your
broadcast
last week
and the
ongoing
nature of
the
mediation
scheme,
not to
mention
the point I
raised on
the phone
about
potential
compromis
e of cases
going
through
the
scheme.
Given that
the
programm
e is
broadcast
every
evening it
seems
reasonable
to me to
ask for the
timescales
to be
extended
so that we
can
respond
properly.

I look forward to hearing from you. I am also copying this to Ingrid Kelly who kindly left me a voicemail this afternoon confirming that we could indeed have a slot in the studio to answer questions on your film. I also copy Nick Wallis, and Mel Corfield and Ruth Barker from the Post Office press office.

I am happy to discuss this over the weekend.

Best wishes

Mark

Mark
Davies
Communications and
Corporate

Affairs
Director
Mobile:

GRO

From:
Nick
Wallis

GRO

Sent: 12
December
2014

11:53

To:
Melanie
Corfield
Subject:
Interview
request

Dear
Melanie,

1) Thank
you for
your help
with The
One Show
item
transmitted
on
Tuesday
9th Decem
ber. We
are now
preparing a
second
film which
is due to
go out on
The One
Show on
BBC1 at
around the
same time
next week.
We would
be most

grateful if
the Post
Office
would be
prepared
to offer an
interview
expressing
its point of
view in the
continuing
dispute
with some
Subpostma
sters over
Horizon
and
associated
issues.

This would
need to be
recorded
by noon on
Monday b
ut we
would be
able to
meet you
at your
location of
choice and
we can do
it over the
weekend if
that is the
only
option.

2) The film
we are
broadcasti
ng once
again
refers to
concerns
over
Horizon.
This time
it features
the story
of Steve
Phillips

from
Nelson in
South
Wales who
is having
problems
with the
system, as
well as
interviews
from a
group of
former
subpostma
sters
including
Noel
Thomas,
Jo
Hamilton,
Julian
Wilson,
who say
they felt
under
pressure to
sign off
incorrect
accounts
even
though
they did
not
understand
how sums
could be
missing.

Mr Phillips
says he
and other
Subpostma
sters live in
fear of
being told
to pay
back losses
neither you
or they can
explain,
and he
adds that

he and
other
Subpostma
sters do
not trust
Horizon.
This latter
point of
trust in
Horizon by
Subpostma
sters is one
which has
come up
many times
with other
former
Subpostma
sters we
have
spoken to.

3) In our
film former
Postmaster
s say it is
difficult to
investigate
the causes
of
shortfalls
for which
they are
held liable,
because of
the way
Horizon
and
associated
POL
processes
and policy
function.
They say
in order to
open for
business
the day
after the
close of a
trading
period they

had to
agree to
pay back
alleged
shortfalls
(either by
settling to
cash or
settling
centrally,
which
implies
payment
later).
They say
this put
them in a
very
difficult
position.

4) We ask
one former
Subpostma
ster why
she
pleaded
guilty to
false
accounting
in court
when she
believed
herself to
be
innocent.
She tell us
she felt she
couldn't
defend
herself
because
she didn't
have
proper
records,
that the
Post Office
had taken
some
potentially
useful

items and
paperwork
away
during
their
investigati
on and she
felt she
would be
prosecuted
for theft as
well as
false
accounting
if she had
not
pleaded
guilty to
the latter.

5) We
understand
from the
Subpostma
ster
contract
and from
speaking
to former
Subpostma
sters who
have been
through
the process
that
Subpostma
sters are
not
allowed a
legal
representat
ive when
they are
interviewe
d under
caution by
Post Office
investigato
rs. Instead
they are
allowed
one

companion
who must
be a Post
Office
employee,
who is not
allowed to
speak.
Does this
still
happen? If
so, why
does the
Post Office
think it is
fair? Also,
we are
aware that
Post Office
conducts
PACE
interviews
at which
Subpostma
sters are
allowed
legal
representat
ion. Could
you
explain in
what
circumstan
ces you
think it
appropriat
e to
interview
someone
under
caution but
with legal
representat
ion, and
why this is
not
available
to
Subpostma
sters in the
interviews
which

usually
precede
them?

6) We would also like to put to you some opinion about the Post Office's approach to investigating and prosecuting subpostmasters. We are in possession of expert opinion from a professor in criminal justice which implies the Post Office's dual function as investigator and prosecutor, and its 300 year cultural history of using it against its agents is unique. That's not to say he thinks you are the only organisatio

n with
prosecutin
g powers,
but that
you have a
unique
culture of
prosecutin
g your
agents. He
implies this
approach
lacks the
checks and
balances of
a typical
prosecutio
n by the
CPS. In his
opinion
this creates
a situation
where
miscarriag
es of
justice are
more likely
to occur.

The Post
Office has
assured us
in a
Freedom
of
Informatio
n Act
request
that it uses
the Crown
Code for
Prosecutor
s. Can you
please
explain
how this
code was
applied in
the
following
cases:
Jackie

McDonald,
Damian
Owen and
Tom
Brown. In
these cases
the Post
Office
pursued its
own
prosecutio
n despite
no
prosecutio
n having
been
brought by
the CPS
after police
investigati
ons. If you
are unable
to unable
to
comment
on
individual
cases,
please
comment
on cases
like this in
general.

7) There is
also a
point
raised by
Geoffrey
Sturgess, a
business
contract
expert. He
believes
Subpostma
sters
should be
told about
the history
of known
problems
with

Horizon
(such as
the
Calender
Square
issue and
others
raised in
Second
Sight's
Interim
Report)
which have
led to
shortfalls
in
Subpostma
ster
accounts
and the
history of
other
allegations
against
Horizon
before they
are
allowed to
sign the
Subpostma
ster
contract.

8) We will
also
include
opinion
from
Sandip
Patel QC
who
specialises
in areas
including
business
fraud and
cyber
crime. He
will say he
believes
that
innocent

people
might have
been
wrongly
convicted.
He will
also say
there may
be grounds
for arguing
that the
Horizon
system
(incorporat
ing the
business
processes
around it)
is not as
reliable as
the Post
Office
believed it
to be. He
goes on to
say that if
the PO had
failed to
carry out a
proper
inquiry in
circumstan
ces when
they
should
have, then
some of
the
conviction
s of some
of the
Postmaster
s in the
mediation
scheme
might be
unsafe.

9) With
more than
a hundred
MPs now

saying they have no confidence in the mediation scheme we would like to ask the Post Office what it thinks is the correct way to move forward and find an equitable resolution to the concerns of subPostmasters up and down the country.

10) In summary, we have found a number of experts in their field who have concerns about the Horizon system, the PO's investigations and prosecutions function and the fairness of the Subpostmaster contract. It suggests there is the

possibility
that the
way the
Post Office
goes about
its business
or did go
about its
business
needs
some
proper
explanatio
n. One MP
described
the nature
of the
relationshi
p between
the Post
Office and
SPMRs as
“feudal”,
yet you
call them
your “life
blood”.

The
content of
the
proposed
programm
e is not set
in stone.
This is an
opportunit
y for the
Post Office
to respond
to the
widesprea
d criticism
it is
currently
facing. I
am seeking
a senior
member of
staff from
the Post
Office who

can explain everything from the Post Office's perspective so that we can get to the bottom of what has happened to these people. If you will not appear on camera then we ask that you provide a substantive response to the issues raised above by noon this coming Monday 15 Dec.

Thank you

This email and any attachments are confidential and intended for the addressee only. If you are not the named recipient, you must not use,

disclose,
reproduce,
copy or
distribute
the
contents of
this
communica
tion. If you
have
received
this in error,
please
contact the
sender by
reply email
and then
delete this
email from
your
system.
Any views
or opinions
expressed
within this
email are
solely those
of the
sender,
unless
otherwise
specifically
stated.

POST
OFFICE
LIMITED is
registered
in England
and Wales
no
2154540.
Registered
Office: 148
OLD
STREET,
LONDON
EC1V 9HQ.

This email and any
attachments are
confidential and intended

for the addressee only. If you are not the named recipient, you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender by reply email and then delete this email from your system. Any views or opinions expressed within this email are solely those of the sender, unless otherwise specifically stated.

POST OFFICE LIMITED is registered in England and Wales no 2154540. Registered Office: 148 OLD STREET, LONDON EC1V 9HQ.

This email and any attachments are confidential and intended for the addressee only. If you are not the named recipient, you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender by reply email and then delete this email from your system. Any views or opinions expressed within this email are solely those of the sender, unless otherwise specifically stated.

POST OFFICE LIMITED is registered in England and Wales no 2154540. Registered Office: 148 OLD STREET, LONDON EC1V 9HQ.

This email and any attachments are confidential and intended for the addressee only. If you are not the named recipient, you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender by reply email and then delete this email from your system. Any views or opinions expressed within this email are solely those of the sender, unless otherwise specifically stated.

POST OFFICE LIMITED is registered in England and Wales no 2154540. Registered Office: 148 OLD STREET, LONDON EC1V 9HQ.

**

This email and any attachments are confidential and intended for the addressee only. If you are not the named recipient, you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender by reply email and then delete this email from your system. Any views or opinions expressed within this email are solely those of the sender, unless otherwise specifically stated.

POST OFFICE LIMITED is registered in England and Wales no 2154540. Registered Office: 148 OLD STREET, LONDON EC1V 9HQ.

**

This email and any attachments are confidential and intended for the addressee only. If you are not the named recipient, you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender by reply email and then delete this email from your system. Any views or opinions expressed

within this email are
solely those of the
sender, unless
otherwise specifically
stated.

POST OFFICE
LIMITED is registered in
England and Wales no
2154540. Registered
Office: 148 OLD
STREET, LONDON
EC1V 9HQ.

This email and any attachments are confidential
and intended for the addressee only. If you are not
the named recipient, you must not use, disclose,
reproduce, copy or distribute the contents of this
communication. If you have received this in error,
please contact the sender by reply email and then
delete this email from your system. Any views or
opinions expressed within this email are solely
those of the sender, unless otherwise specifically
stated.

POST OFFICE LIMITED is registered in England
and Wales no 2154540. Registered Office: 148
OLD STREET, LONDON EC1V 9HQ.

This email and any attachments are confidential and intended for the
addressee only. If you are not the named recipient, you must not use,
disclose, reproduce, copy or distribute the contents of this communication. If
you have received this in error, please contact the sender by reply email and
then delete this email from your system. Any views or opinions expressed
within this email are solely those of the sender, unless otherwise specifically
stated.

POST OFFICE LIMITED is registered in England and Wales no 2154540.
Registered Office: 148 OLD STREET, LONDON EC1V 9HQ.

This email and any attachments are confidential and intended for the addressee only. If you are not the
named recipient, you must not use, disclose, reproduce, copy or distribute the contents of this
communication. If you have received this in error, please contact the sender by reply email and then
delete this email from your system. Any views or opinions expressed within this email are solely those of
the sender, unless otherwise specifically stated.

POST OFFICE LIMITED is registered in England and Wales no 2154540. Registered Office: 148 OLD STREET, LONDON EC1V 9HQ.

CMS has 59 offices around the world, located in Aberdeen, Algiers, Amsterdam, Antwerp, Barcelona, Beijing, Belgrade, Berlin, Bratislava, Bristol, Brussels, Bucharest, Budapest, Casablanca, Cologne, Dubai, Duesseldorf, Edinburgh, Frankfurt, Geneva, Glasgow, Hamburg, Istanbul, Kyiv, Leipzig, Lisbon, Ljubljana, London, Luxembourg, Lyon, Madrid, Mexico City, Milan, Moscow, Munich, Muscat, Paris, Podgorica, Prague, Rio de Janeiro, Rome, Sarajevo, Seville, Shanghai, Sofia, Strasbourg, Stuttgart, Tirana, Utrecht, Vienna, Warsaw, Zagreb and Zurich.

CMS Cameron McKenna LLP is a member of CMS Legal Services EEIG (CMS EEIG), a European Economic Interest Grouping that coordinates an organisation of independent law firms. CMS EEIG provides no client services. Such services are solely provided by CMS EEIG's member firms in their respective jurisdictions. CMS EEIG and each of its member firms are separate and legally distinct entities, and no such entity has any authority to bind any other. CMS EEIG and each member firm are liable only for their own acts or omissions and not those of each other. The brand name "CMS" and the term "firm" are used to refer to some or all of the member firms or their offices. Further information can be found at www.cmslegal.com

CMS Cameron McKenna LLP is a limited liability partnership registered in England and Wales with registration number OC310335. It is a body corporate which uses the word "partner" to refer to a member, or an employee or consultant with equivalent standing and qualifications. It is authorised and regulated by the Solicitors Regulation Authority of England and Wales with SRA number 423370 and by the Law Society of Scotland with registered number 47313. A list of members and their professional qualifications is open to inspection at the registered office, Mitre House, 160 Aldersgate Street, London EC1A 4DD. Members are either solicitors or registered foreign lawyers. VAT registration number: 974 899 925. Further information about the firm can be found at www.cms-cmck.com

The contents of this e-mail (including any attachments) are confidential and may be legally privileged. If you are not the intended recipient of this e-mail, any disclosure, copying, distribution or use of its contents is strictly prohibited, and you should please notify the sender immediately and then delete it (including any attachments) from your system. Notice: the firm does not accept service by e-mail of court proceedings, other processes or formal notices of any kind without specific prior written agreement.

This email and any attachments are confidential and intended for the addressee only. If you are not the named recipient, you must not use, disclose, reproduce, copy or distribute the contents of this communication. If you have received this in error, please contact the sender by reply email and then delete this email from your system. Any views or opinions expressed within this email are solely those of the sender, unless otherwise specifically stated.

POST OFFICE LIMITED is registered in England and Wales no 2154540. Registered Office: 148 OLD STREET, LONDON EC1V 9HQ.

<ScanToEmail.pdf>