

Message

**From:** Paula Vennells  
on behalf of Paula Vennells  
**Sent:** 27/06/2013 14:13:43  
**To:** Susan Crichton  
**Subject:** Fwd: Second Sight Investigation - Update  
**Attachments:** image010.jpg; image003.png; image004.png; image005.png; image006.png; image007.gif; image008.gif; image009.png

**GRO**

FYI. I hope the holiday apart from this is good :)

Sent from my iPad

Begin forwarded message:

**From:** Rodric Williams  
**Date:** 27 June 2013 15:02:37 BST  
**To:** Paula Vennells  
**Cc:** Hugh Flemington; Alwen Lyons  
**Subject:** Second Sight Investigation - Update

**GRO**

Paula –here is a summary of our discussion on the Horizon investigation, with some additional points on criminal prosecutions.

1. <!--[if !supportLists]--><![endif]--> **Horizon Generally**

Over the past ten years:

- <!--[if !supportLists]--><![endif]-->many millions of branch reconciliations;
- <!--[if !supportLists]--><![endif]-->carried out by 25,000 subpostmasters and their staff in Post Office branches;
- <!--[if !supportLists]--><![endif]-->transactions and balances accurately recorded;

i.e. if there was a systemic problem, we would have seen it replicated on a widespread basis.

Where we have identified “bugs” in Horizon, we have shared these with Second Sight.

2. <!--[if !supportLists]--><![endif]--> **Scope of Second Sight Review**

“To identify, consider and advise on whether there are any systemic issues and/or concerns with the ‘Horizon’ system, including training and support processes, giving evidence and reasons.”

- <!--[if !supportLists]--><![endif]-->Scope DOES NOT extend to considering any individual criminal prosecution or conviction;
- <!--[if !supportLists]--><![endif]-->Second Sight are not expert in or qualified to comment upon criminal prosecution process or procedures;
- <!--[if !supportLists]--><![endif]-->Second Sight have not identified for Post Office Limited any issue with Horizon which Second Sight says was directly responsible for a criminal conviction.

3. <!--[if !supportLists]--><![endif]--> **Issues Reviewed**

- <!--[if !supportLists]--><![endif]-->10 issues raised by Second Sight;
- <!--[if !supportLists]--><![endif]-->In each case, we have been able to demonstrate (with supporting documentation) that Horizon acted as designed;

- <!--[if !supportLists]--><![endif]-->Second Sight seem to be saying that because Horizon has “bugs”, it is not safe for Post Office to rely upon the data it produces, e.g. in a criminal case to show branch shortfalls. This is a significant and unhelpful assumption to make.

4. <!--[if !supportLists]--><![endif]-->**Criminal Prosecutions**

- <!--[if !supportLists]--><![endif]-->No cases since at least separation have seen convictions secured on Horizon-based evidence alone, e.g. there has also been a paper trail, money in bank account, confession, and/or lies at interview exposed.
- <!--[if !supportLists]--><![endif]-->Again, since separation every time the defendant has alleged a specific issue with Horizon, we have been able to refute this to the Court’s satisfaction.
- <!--[if !supportLists]--><![endif]-->If a person feels their conviction is unsafe, they need to produce new evidence and get the Court’s permission to appeal.
- <!--[if !supportLists]--><![endif]-->A sound bite from a Second Sight report is unlikely to be sufficient.
- <!--[if !supportLists]--><![endif]-->If we found a problem which contributed to a conviction, we would be under a duty to raise this with the Court.

Please let me know if you need anything further.

Kind regards, Rodric

Rodric Williams I Litigation Lawyer

