

Witness Name: Graham David Brander

Statement No.: WITN08300100

Dated: 30 October 2023

## **POST OFFICE HORIZON IT INQUIRY**

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### **FIRST WITNESS STATEMENT OF Graham David Brander**

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I, Graham David Brander, will say as follows...

1. This witness statement is made to assist the Post Office Horizon IT Inquiry (the "Inquiry") with the matters set out in the Rule 9 Request dated 03 October 2023 (the "Request").

#### **BACKGROUND**

2.

i) My education qualifications are "A/O" Level Mathematics and "O" Levels (or equivalent) in Mathematics, English Language, Physics, Economics, Geography and History.

ii) I joined Post Office Limited (POL) in March 1984, working as a counter clerk at a Crown Post Office (now known as Directly Managed Branches). This role involved serving customers relating to various POL transactions and services. At that time, there was no computer system and weekly balancing was conducted manually.

3. Whilst employed in the counter clerk role, there was a period of time in which I also trained new subpostmasters in respect of serving customers and balancing.

This was done on an ad hoc basis, as and when required.

4. At some point after 1984, I was promoted to Assistant Branch Manager but I cannot recall when this was. This role involved a mixture of completing admin work as well as serving customers. In that role, I would also support both the Branch Manager and the rest of the team.

5. In January 1997 I was promoted to Branch Manager, a position I held until August 2000. My main responsibilities were to support and develop my team, ensuring that our customers received an excellent service. I would conduct regular one to ones' with each member of my team as well as writing yearly appraisals.

6. In August 2000 I took up a role as a Security Manager within POL having successfully applied for this position.

7. Prior to attending a residential training course, which I think lasted approximately 2 weeks, I was supplied with some pre-course work, which related to a number of modules that would be covered as part of my training. I cannot recall all the modules but believe they included The Theft Act and some sections (three I believe) relating to the Police and Criminal Evidence Act 1984 codes of practice.

8. I seem to recall that I completed the pre course work over a period of approximately 2 weeks, immediately prior to attending the residential course. During this time, the Horizon system was being installed and operated on at the Post Office branch that I managed. I wasn't heavily involved in this due to the amount of time I needed to complete the security training pre-course work. I have a vague recollection that my team and I completed classroom training on operating the Horizon kit prior to it being installed. The team would then have received a period of onsite training once Horizon had gone live at our branch.

9. I only have a vague recollection of the Security Manager training course that I attended. I can recall that we completed a test at the beginning of the course, based on the pre-course work. During the course we went through the various modules in a classroom environment. The only exception that I can recall is when we attended what I believe was a police training facility whereby we had some training on searching a house. I can recall that at the end of the training, we had to complete a test, which required achieving a certain score in order to pass the course. I achieved the required score and passed the course.

10. Following completion of the training course I began work as a Security Manager, operating from a room above Eastleigh Crown Office, which was not far from where I lived. I was the only Security Manager operating from that office, as typically, we were spread across the country, although there were some locations that accommodated a number of Security personnel.

11. I can remember that it was a steep learning curve in regards to understanding and gaining experience into criminal investigations, as well as elements relating to physical security, particularly as I was isolated to a certain extent. I cannot recall particular details around this time but I would have been supported by my team leader and new colleagues, including shadowing and sitting in on a number of interviews as a witness.

12. Whilst in my role as a Security Manager the role varied in that there were times when it was classed as multi skilled, which involved both physical security as well as investigations into suspected criminality. There was a period, not that long after I joined the Security Team, when I was in a small national team that predominately dealt with post robbery incidents. I cannot recall much detail regarding this role, other than that I would visit PO branches after a robbery incident, liaise with the police and submit a report that detailed the incident.

13. Throughout my time as a Security Manager, I would say that for the most part, I dealt with suspected criminal investigations. The types of cases that I would have investigated would for example, include audit shortages, Crown Office losses, pension and allowance fraud etc.

14. In respect of criminal investigations, I would analyse documents and Horizon data, conduct tape recorded interviews under caution, conduct searches of suspect's abode, prepare reports and case files for the Criminal Law Team, obtain witness statements and conduct certain activities in relation to prosecutions e.g. obtaining and issuing a summons to attend court, the preparation of a committal bundle etc.

15. In 2008, for a period of approximately 3 to 4 months I was asked to perform as acting Team leader, due to a recent vacancy. I cannot recall much detail but seem to recall that I retained my existing case load whilst performing line manager duties, such as completing one to ones and chairing team meetings. As acting Team Leader, I would have been responsible for allocating cases to members of the team, although I cannot recall any specific cases. When the team leader role was filled on a permanent basis, I reverted to my role as a Security Manager.

16. During my time as a Security Manager I would have worked with numerous colleagues and had several different line managers. I initially worked in what was known as the South West Security Team, as well as working in the South East Team. From what I can recall, I would have regarded all colleagues that I worked with as both competent and professional.

17. In March 2012 I applied for and was appointed as a Network Transformation Field Change Advisor (FCA). The Network Transformation Programme had secured significant investment from the government to transform a large portion of it's Sub Post Office network into modern new models, with larger branches modelled as a Main and smaller ones' as either a Local or Local Plus.

18. Sub Post Offices received a fixed annual payment as well as fees (commission) for the transactions that they conducted. With the new models, the postmaster would only receive variable fees, relating to the transactions that they conducted. Mains model branches received higher fee rates for certain transactions due to the fact that they had to employ a number of staff to operate from the dedicated Post Office counters. A Local had a small Post Office service point, sometimes referred to as a combi, which was usually installed at the end of the retail counter. Postmaster's converting to one of the new models would have received a conversion payment.

19. Under Network Transformation, postmasters also had the option to leave the business with a leaver's payment, subject to a new model solution being installed, either at the existing premises, or somewhere suitable within the local search area. At the start of the programme, postmasters also had the option to stay as is. Some rural Post Offices were effectively the only shop in the village and a number of these were afforded community status, effectively meaning that they remained on their existing contract and terms i.e. remained as a Sub Post Office.

20. When I became an FCA I received some training, but I can't specifically recall where this was, or how long the course lasted. My training would have covered the two new models, the options available to postmasters, what the new counters looked like and their footprint i.e. how much space they would take up.

21. My role as an FCA was to establish new model branches within my geographical area. I would be supplied with fees estimates on what postmasters could expect to earn as well as estimated conversion and leavers payments. I would receive batches of postmasters to contact and to arrange visits and go through the options. My role would oversee the end to end process up until a branch went live and primarily support Postmasters on their journey.

22. I worked with numerous colleagues within the Network Transformation Team and had a number of line managers, all of which I believe to have been both competent and professional.

23. In 2017 the Network Transformation programme was nearing completion and my role as an FCA simply came to an end. Numerous personnel, including myself were offered voluntary redundancy. As there were very few suitable job opportunities within POL at that time, I decided to take the redundancy offer and left POL in September 2017.

24. After more than 30 years of continuous employment with POL I was looking forward to a break, although at that time I had no real plans of what else I wanted to do, or how long before I sought alternative employment.

25. Sometime in late 2018 I was asked by an ex Post Office line manager if I was interested in a role, contracted to a company called CBRE, in which I would effectively be seconded to POL in order to help deliver Post Office projects for the final quarter of that financial year. I was subsequently interviewed by someone in CBRE and offered a fixed term contract as a Project Delivery Manager (PDM). I accepted this, and performed that role from towards the end of December 2018 until the end of March 2019.

26. I completed some online training modules in December and in early January I attended a training course, led by a senior Post Office Property Manager. I believe the course ran for 2 to 3 days and it covered things like the paperwork completion for installing a Post Office in a premises as well as using software to draw the premises layout and include items such as the Post Office counter, signage, safe etc. It was a steep learning curve, re-integrating myself into the work place after more than a year away and getting to grips with the paperwork and drawing tool.

27. During my time as a PDM I visited a number of premises that had completed the Post Office application process and were now ready for the counter etc to be installed. I would discuss the works required with the incoming postmaster and ultimately schedule dates for each install element including a go live date. I would take photos, complete the relevant paperwork and submit this to the relevant Post Office support team, who would then place the works orders with the relevant contractors.

28. Later in 2019 I became aware of a vacancy within POL for the role of a Change Manager (now called Network Provision Lead (NPL)) that covered an area in and around where I lived. I successfully applied for the position and re-joined POL in November 2019.

29. I don't recall receiving any specific training for this position, as I believe it was felt that I had performed similar roles in the past and had lots of relevant experience. As such, it was case of seeking guidance and support from my line manager and colleagues for anything that I was unsure of.

30. My role as an NPL primarily involves managing the Network Numbers (Post Office branches open) within a geographical area. If a branch closes within my area, then subject to business need, I would look to re-establish a service within that community. This may mean a like for like replacement, which would be advertised on the Run a Post Office website, or seeking to create an outreach, or to add as a stop on the schedule of one of the mobile vans operating within my area.

31. Whilst employed by POL as a Security Manager, once I had interviewed a suspect under caution, in addition to the report that I would submit to the Criminal Law Team (via the Security Casework Team), I would also produce a separate, but similar report for the relevant Contracts Manager. I believe that they used this in conjunction with other documents e.g the auditor's report, to assist them with

any decisions relating to disciplinary matters.

32. When submitting a case file to the Criminal Law Team, it would contain the suspect offender report, taped interview summaries and any relevant correspondence e.g. memos from the solicitor and relevant emails, further reports etc from the Security Manager. The case file would also include 3 appendices and I seem to recall that Appendix A was for witness statements (usually obtained after legal advice), Appendix B was for copies of evidence and Appendix C for copies of certain unused material.

33. If a case progressed to a Committal Hearing, then I seem to recall that the Security Manager would produce a committal bundle, which comprised of copies of Statements, evidence, and unused material. If there was a lot of unused material then it may be that the items were listed but not copied, and that the defence could arrange to view these documents if they so wished. The committal bundle would be sent to the Criminal Law Team and they would be the ones who would disclose the material to the defence.

34. Prior to an interview under caution, and if the suspect had legal representation, I would disclose to the solicitor, details of the suspected offence and any documents that I would be producing at that time.

35. I have no specific recollection of any dealings with the Civil Litigation Team, although it may be that I was contacted by someone from that team from time to time, in respect of a criminal case that I had investigated. I have no knowledge of the disclosure policy within the Civil Litigation Team and do not know what the Litigation Case Strategy would have been.

36. During my time as a Security Manager, I would have dealt with other departments, for example, requesting personnel files from our Human Resources

team. I have no recollection of specifically liaising with other Post Office departments in respect of the progress of cases, although this may well have happened on a case by case basis.

The Security team's role in relation to criminal investigations and prosecutions

37. I have been asked by the Inquiry to consider the following documents, which I may find to be of assistance when answering the questions set out below:

- i) Casework Management Policy (version 1.0, March 2000) ([POL00104747]) and (version 4.0, October 2002) ([POL00104777]);
- ii) Rules and Standards Policy (version 2.0, October 2000) ([POL00104754]);
- iii) "Investigation Procedures Policy (version 2.0, January 2001) ([POL00030687]);
- iv) Disclosure Of Unused Material, Criminal Procedures and Investigations Act 1996 Codes of Practice Policy (version 1.0, May 2001) ([POL00104762]);
- v) "Royal Mail Group Ltd Criminal Investigation and Prosecution Policy" (1 December 2007) ([POL00030578]), which appears to be substantially the same as the policy of the same date with a variation on the title at ([POL00104812]) (see, in particular, section 3);
- vi) "Royal Mail Group Security - Procedures & Standards - Standards of Behaviour and Complaints Procedure" (version 2, October 2007) ([POL00104806]);
- vii) "Royal Mail Group Crime and Investigation Policy" (version 1.1, October 2009) ([POL00031003]);
- viii) "Post Office Ltd - Security Policy - Fraud Investigation and Prosecution Policy" (version 2, 4 April 2010) ([POL00030580]);
- ix) "Post Office Ltd Financial Investigation Policy" (4 May 2010) ([POL00030579]);
- x) "Royal Mail Group Security - Procedures & Standards - The Proceeds of Crime Act 2002 & Financial Investigations" (version 1, September 2010) ([POL00026573]);
- xi) "Royal Mail Group Security - Procedures & Standards - Initiating Investigations" (September 2010) ([POL00104857]);
- xii) "Royal Mail Group Ltd Criminal Investigation and Prosecution Policy" (version

- 1.1, November 2010) ([POL00031008]);
- xiii) Post Office Ltd Financial Investigation Policy (version 2, February 2011) ([POL00104853]);
- xiv) Post Office Ltd Anti-Fraud Policy (February 2011) ([POL00104855]);
- xv) "Royal Mail Group Policy Crime and Investigation S2" (version 3.0, April 2011) ([POL00030786]);
- xvi) "Post Office Ltd PNC Security Operating Procedures" (August 2012) ([POL00105229]);
- xvii) "Post Office Limited: Internal Protocol for Criminal Investigation and Enforcement (with flowchart)", (October 2012) ([POL00104929]);
- xviii) "Undated Appendix 1 - POL Criminal Investigations and Enforcement Procedure (flowchart)", (October 2012) ([POL00105226]);
- xix) The undated document entitled "POL – Enforcement & Prosecution Policy" ([POL00104968]);
- xx) "Post Office Limited: Criminal Enforcement and Prosecution Policy" (undated) ([POL00030602]);
- xxi) "Conduct of Criminal Investigations Policy" (version 0.2, 29 August 2013) ([POL00031005]);
- xxii) "Conduct of Criminal Investigations Policy" (version 3, 10 February 2014) ([POL00027863]);
- xxiii) "Conduct of Criminal Investigations Policy" (September 2018) ([POL00030902]).

38. I have no recollection of any of the documents listed above. It may be that I had previously seen some, or all of these documents but I have no recollection. I would have thought that policy documents would have been stored on some sort of database, in which someone could access if required.

39. The organisational structure of the Security team did change over time. I cannot recall specific changes or when they occurred but typically, there would be a Head of Security, under which were Senior Security Managers that headed up certain strands

of security and the teams within each strand. For example, I seem to recall that the Security Managers were in the Fraud strand, but it may have been called something else at different times. Under the Senior Security Manager would be a number of Team leaders and under them, a number of Security Managers. When I first joined the Security Team I seem to recall that there were around 5 to 6 teams of Security Managers. Within each team I recall that there were typically around 6 to 8 Security Managers. Over time, following various restructures within the Security Team, the numbers of teams and personnel would gradually decline. When I left the Security Team there were just 2 teams of Security Managers, a North Team and a South Team. I seem to recall that it had been just the 2 teams for quite some time.

40. I have no recollection of any of the documents listed in paragraph 38 above and would say that it is extremely unlikely that I would have had any involvement in the development and / or management of them.

41. I have no specific recollection as to what legislation, policies and / or guidance governed the conduct of investigations conducted by the Security team during the period that I worked within it, other than that I can recall the names of certain legislative acts e.g. The Theft Act, The Fraud Act and that investigations were conducted in accordance with the Police and Criminal Evidence Act 1984 codes of practice. From memory, the codes of practice covered the interviewing of suspect offenders and conducting searches. I have a vague recollection that any key changes to relevant legislation or any new acts e.g. the Fraud Act, would have been communicated to Security Managers, possibly via the Criminal Law Team.

42. I have no recollection as to what process was in place for dealing with complaints about the conduct of an investigation by the Security team? I have no recollection of any complaints made either against the way that I conducted an investigation, or any that were conducted by any of my colleagues.

43. In terms of supervision over criminal investigations conducted by Security Managers, the Team Leader would be aware of all cases being conducted by their team and these would be discussed at one to ones and team meetings. I believe that cases would also be discussed at Senior Security Meetings that the Team Leaders would also attend.

44. I do not recall there being any difference in Post Office policy and practice regarding investigation and prosecution of Crown Office employees in relation to any policy and practice regarding investigation and prosecution of Sub Postmasters, their managers and assistants.

#### Audit and investigation

45. I have been asked to consider the document "Condensed Guide for Audit Attendance" (version 2, October 2008) [**POL00104821**]:

I have no recollection of this document. As far as I can recall, there would have been situations in which Security Managers would attend a Post Office Branch whilst an audit was in progress, or had just been completed and there was a large shortfall in the accounts. There would have been some occasions whereby Security Managers would attend at the same time as auditors. This may have been if there were existing concerns that there may be a significant shortfall in the accounts. In my experience and recollection, the Security Manager would not actively participate in the audit.

46. From recollection, investigation cases would be generated by the Security Casework Team. They may have been asked to raise a case by the Security Team Leader, although there may have been some situations whereby cases were instigated by other Security personnel but I have no specific recollection of this. I have no recollection of something called the Financial Services Centre or how debts were recovered from postmasters in relation to shortfalls that weren't the subject of a criminal investigation. I have no recollection as to what involvement a Contracts Manager would have in relation to the policy for postmasters repaying debts due to

shortfalls in their accounts.

47. I cannot recall what the triggers / criteria were for raising a fraud case following the identification of a shortfall / discrepancy in a branch? I do not believe that there were separate triggers / criteria for raising a theft case in relation to a false accounting case. My recollection is that these would simply be raised as audit shortfall cases.

The process followed by Security team investigators when conducting a criminal investigation following the identification of a shortfall at an audit

48. Once a decision had been made to conduct a criminal investigation, a case would be allocated to a Security Manager by the Team Leader. The Security Manager would conduct initial enquiries relating to the type of case and ultimately arrange to conduct an interview under caution with anyone who was suspected of having committed a criminal offence.

49. For example, if the case related to a significant audit shortage that had been brought to the Security Team's attention by an auditor at the time of the audit, then subject to availability and other priorities, members of the Security Team may attend the Post Office in question that same day. This would be to gather PO accounting documentation and potentially seek to conduct searches and interview at that time.

50. Prior to attending the Post Office subject to the audit deficiency, the Security Manager may have analysed some Horizon data that was available on a what was known as Credence. From recollection, this was a management information database relating to Horizon transactions and other entries that were conducted at Post Offices. I cannot recall when Credence came into existence, or over what period the Security Team had access to this. I recall that Credence only held data for a relatively short period of time, possibly 2 to 3 months, but I can't be certain of this.

51. When attending a Post Office branch, the Security Managers would introduce themselves to the postmaster or manager and show their ID cards. This would also apply to any post office assistants or Post Office employees that were to be involved, either as suspects or witnesses.

52. To use an audit shortage case as an example, if there was evidence of a criminal offence and that someone was suspected of having committed that offence, then it would normally follow that they would be invited to attend an interview and that searches of premises and vehicle would be requested. In that situation, the suspect would be cautioned and their legal rights explained. This was covered on form CS001 (at some point called GS001 I believe) and the suspect was invited to indicate on the form as to whether they required legal representation at that time. They would then be invited to sign the completed form and to confirm their understanding.

53. For voluntary interviews, the suspect could also have what was known as a Post Office Friend present, which had to be somebody within the business but not connected to the investigation. So for example, this could be a representative of the National Federation of Subpostmasters. This entitlement was in addition to having legal representation, so a suspect could have both a solicitor and Post Office Friend present during an interview. The Post Office Friend rule was covered on form CS003 (GS003) and the suspect would be invited to read and sign this.

54. The Security Manager may wish to conduct searches of the suspect's premises, home and vehicle. Unless the suspect had been arrested by the police, then searches and interviews were on a voluntary basis and that consent was required from the suspect. I seem to recall that form CS005 (GS005) set out the details of the search, in what was being searched, the extent of the search and that they could ask for the search to stop at any time. The suspect would be asked to read and sign the form, indicating whether they gave consent for searches to take place.

55. In some cases, the Police were asked to assist, particularly for certain cases where searches were deemed essential to obtain and preserve evidence. In these situations, any suspects would be arrested, and searches conducted by the Police under the relevant sections of the Police and Criminal Evidence Act (PACE).

56. Interviews would be tape recorded and conducted under caution. The suspect would be entitled to seek legal advice and representation at the interview. The tape machines supplied to Security Managers would require 2 tape cassettes to be installed for each interview. I seem to recall that the tapes would run for approximately 45 minutes. If the interview needed to be continued, then a further 2 tapes would be inserted. Of each set of 2 tapes, one would be signed and sealed and act as the Master Tape, which may later be produced as evidence and the other would be used as a working tape, of which copies could be taken.

57. Following an interview, the Security Manager would compile what was referred to as an Offender Report and paginate it within a green case file. The file would also contain appendices, and from recollection, any copies of any statements obtained thus far would go in Appendix A, copies of evidence in Appendix B and copies of certain unused material items e.g. Post Office Friend form, Personnel record etc would go in Appendix C. The case file would then be sent to the Criminal Law Team, via the Security Casework Team, I believe.

#### Decisions about prosecution and criminal enforcement proceedings

58. The Criminal Law Team may ask for further enquiries to be conducted at that stage but ultimately would be the ones to advise on and formulate any criminal charges. From my recollection, the decision to prosecute would be made by a Senior Security Manager, and this was probably the Head of the Security Fraud Team. I do not believe that the Contracts Manager would have any involvement in this decision, but would purely deal with the discipline / contractual element.

59. I have no knowledge or recollection as to what test was applied by those making prosecution and charging decisions, or what factors were considered at the evidential and the public interest stage?

60. I am unaware as to what advice, legal or otherwise, was provided to those making decisions about whether to prosecute and what charges to bring, other than that I believe that they would have seen the case file, or at least, the advice from the Criminal Law Team when considering their decision.

61. I have no recollection regarding in what circumstances, consideration was given towards any steps taken, in which to restrain a suspect's assets by criminal enforcement methods, such as confiscation proceedings. I have no recollection as to who decided whether criminal enforcement proceedings should be pursued and what factors they considered when making decisions around this. I seem to recall that if an offender pleaded guilty at court, or was found guilty following a trial, that POL would ask the court to consider awarding costs and compensation.

Training, instructions and guidance to investigators within the Security team

62. I have been asked by the inquiry about instructions, guidance and / or training that were given to investigators within the Security team about the following topics and how was this provided:

- i) interviewing a SPM / SPM's assistant / Crown Office employee who was suspected of a criminal offence;
- ii) taking witness statements in the course of an investigation;
- iii) conducting searches in the course of an investigation;
- iv) the duty on an investigator to investigate a case fully;
- v) obtaining evidence in the course of an investigation;
- vi) whether and in what circumstances evidence should be sought from third parties who might hold relevant evidence and, in particular, Fujitsu, where shortfalls were identified in branch;

- vii) an investigator's disclosure obligations;
- viii) drafting investigation reports to enable a decision to be made about the future conduct of a case.

63. In relation to paragraph 62 above, I have very little recollection as to what specific instruction, guidance and training I received. I can recall that conducting interviews, searches and taking witness statements was covered on my Security Induction Training. I can recall that I attended a training course relating to conducting interviews at some point when I was a Security Manager but I cannot recall the details. As best as I can recall, following my induction training, knowledge and experience was gained through shadowing and working with more experienced colleagues, including support from the Team Leader.

64. The inquiry has asked me to consider the following documents:

- i) The Casework Management document at [POL00104747] (version 1.0, March 2000) and [POL00104777] (version 4.0, October 2002);
- ii) David Posnett's email to me and others dated 23 May 2011 at [POL00118096] and the documents contained within the attached compliance zip file at [POL00118108], [POL00118109], [POL00118101], [POL00118102], [POL00118103], [POL00118104], [POL00118105], [POL00118106] and [POL00118107].

65. I have no recollection of the 2 documents referred to in paragraph 64 i) above and cannot say whether I was ever provided with copies of them. These documents appear to have been written over 20 years ago and i would not now be able to recall any of the content contained within, or what my understanding would have been in relation to any content at that time.

66. Some of the documents referred to in paragraph 64 ii) above appear to relate to compliance checks conducted, primarily on the presentation, layout and content of case files. I am unsure at what point case file presentation became the subject of

compliance checks, or if this continued after I left the Security Team. I do not recall any specific documents, but I do recall that these compliance checks were conducted and that some form of guidance (which I assume are these documents) was sent out to Security Managers. I cannot recall who conducted the compliance checks but I can recall there being a scoring matrix. I do not recall having any involvement in either the development, management, or any amendment in relation to these documents.

67. The inquiry has asked about my understanding of paragraph 2.15 (starting on page 10) of the document entitled “Guide to the Preparation and Layout of Investigation Red Label Case Files – Offender reports & Discipline reports” [POL00118101] and how this related to the Offender Report Template [POL00118102], as well as it’s relevance to POL’s disclosure obligations.

68. I have a vague recollection of these 2 documents, which appear to detail the structure and layout of the Offender and Discipline reports. From recollection, disclosure of materials would be dealt with by the Criminal Law Team. I have no recollection of any reference made in relation to any “Horizon bugs, errors and defects” during my time as a Security Manager.

69. I do not recall the document entitled “Identification Codes” (at [POL00118104]), and do not know who drafted this document. My understanding of why Identity codes were required, was that this information would be included on the Police National Computer database, for any persons that were convicted of a criminal offence in relation to a prosecution conducted by the Post Office. I can recall that the relevant identity code was included in the preamble of the offender report. I also believe this was indicated on a form named NPA01, by means of ticking the relevant ID code box.

Analysing Horizon data, requesting ARQ data from Fujitsu and relationship with Fujitsu

70. As a Security Manager, I would have been able to submit requests for Horizon data. I cannot recall whether this was submitted via the Casework Team, or another admin function within the Security Team. The request would be submitted to a contact point working for Fujitsu and a CD Rom containing data for the requested period would be sent to the Security Manager.

71. From recollection, the data was in Microsoft Excel format and the data from the CD Rom was either extracted or copied (I can't recall the precise method) onto the Security Manager's laptop. I cannot specifically recall what analysis was conducted but believe that I would have looked at things such high value transactions, including any adjustments or reversals. I would also look at the amount of cash being declared and the frequency of those declarations.

72. I have been asked by the Inquiry as to where a shortfall had been identified and the relevant postmaster, their manager(s) or assistant(s) / Crown Office employee(s) attributed the shortfall to problems with Horizon, was ARQ data requested from Fujitsu as a matter of course?

73. I can recall that there was a limit to the amount of data that could be obtained as per a standard request. I believe that there was a cost to POL for requests of data that were over the agreed limit. I cannot recall Horizon data being supplied directly to a postmaster, or others subject to a POL criminal investigation, but it would form part of the disclosure from the Criminal Law Team to the Defence legal team. The Security Manager would request a statement from Fujitsu, via the security admin team, and that person (Fujitsu) would produce any Horizon data that had been supplied in that case. My recollection is that the statement and Horizon data would form part of the committal bundle, or further evidence disclosed.

74. The Inquiry has asked me to consider documents [FUJ00153133] and [FUJ00125911] and asked whether I was aware of the issue of duplication of

transactions records in ARQ returns:

My response is that I have no recollection of any such issues. I can see from the documentation (email exchanges) that it would appear that an explanation for the duplication was supplied by Fujitsu and that it did not affect the accuracy of Horizon.

75. The Inquiry has asked me to consider documents [FUJ00154911], [FUJ00154925], [FUJ00156494], [FUJ00156530], [FUJ00156536], [FUJ00154903], [FUJ00155009] and [FUJ00225238] and asked to describe the circumstances in which I would have contact with Fujitsu when I worked within the Security team and the relevant contacts at Fujitsu.

76. I can recall the names of Penny Thomas and Andy Dunks as being contact points at Fujitsu. I seem to recall that Penny was the main contact point for the Post Office Security and I believe that she dealt with Horizon data requests and produced witness statements as and when required. I seem to recall that Andy performed a similar function but from viewing the documentation it would appear that he also dealt with Horizon Call Logs as part of any statement given. From recollection, Security Managers would request Horizon data and statements from Fujitsu via a Security Admin Team, although there appear to have been times when Security Managers would either send or receive emails directly to / from Penny or Andy.

77. I have no recollection of the name Gareth Jenkins from my time as a Security Manager, although I can see his name in some of the email documentation. I have no recollection of him being an expert witness and have no recollection as to whether I had an understanding at that time, as to what the rules are that govern an independent expert witness.

#### Relationship with others

78. I have no specific recollection of Cartwright King Solicitors. I can recall that at

some point in time that POL used external solicitors to assist with prosecutions, but I cannot recall who this was, or the names of any of those solicitors.

Involvement in the Criminal Case Studies

Prosecution of Josephine Hamilton

79. The Inquiry has asked me for a full and detailed account of the investigation and prosecution of Josephine Hamilton and to set out my recollection of this case including but not limited to addressing the questions below. In answering the questions below, the Inquiry suggests that I may be assisted by the following:

- i) The emails, dated March 2006, at **[POL00067205]**;
- ii) The audit report from 9 March 2006 **[POL00044497]**;
- iii) The letter from Graham Brander, dated 9 March 2006 **[POL00047137]**;
- iv) The letter from Graham Brander, dated 12 April 2006 **[POL00118743]**;
- v) The letter from Graham Brander to Ged Harbinson, dated 12 April 2006 **[POL00118769]**;
- vi) The record of Ms Hamilton's interview on 5 May 2006 at **[POL00044477]** and **[POL00045409]**;
- vii) The offender report in respect of Ms Hamilton at **[POL00044389]**;
- viii) The investigation report (personnel) **[POL00047955]**;
- ix) The investigation report (legal) **[POL00044389]**;
- x) The suspect offender report **[UKGI00001504]**;
- xi) The financial investigation events log **[POL00044470]**;
- xii) The memo from Graham Brander (undated) **[POL00064288]**;
- xiii) The letter from Graham Brander, dated 13 June 2006 **[POL00118739]**;
- xiv) The memo from Juliet McFarlane to the Investigation Team, dated 26 June 2006 **[POL00048035]**;
- xv) The letter from Graham Brander, dated 30 June 2006 **[POL00118745]**;
- xvi) The letter from Graham Brander to Josephine Hamilton, dated 10 July 2006 **[POL00048223]**;
- xvii) The memo from Graham Brander, dated 11 August 2006 **[POL00118610]**;

- xviii) The memo from Juliet McFarlane, dated 11 October 2006 [**POL00048205**];
- xix) The letter from Graham Brander, dated 30 October 2006 [**POL00118760**] and summons [**POL00118761**];
- xx) The memo from Graham Brander, dated 14 November 2006 [**POL00048252**];
- xxi) The memo from Juliet McFarlane, dated 16 November 2006 [**POL00048269**];
- xxii) The letter from Graham Brander, dated 27 November 2006 [**POL00118768**];
- xxiii) The information, dated 6 December 2006 [**POL00118762**];
- xxiv) The witness statement of Graham Brander, dated 3 January 2007 [**POL00044484**];
- xxv) The witness statement of Penny Thomas, dated 9 January 2007 [**POL00044481**];
- xxvi) The memo from Graham Brander, dated 15 January 2007 [**POL00118754**];
- xxvii) The memo from Juliet McFarlane, dated 30 January 2007 [**POL00048473**];
- xxviii) The memo from Juliet McFarlane, dated 13 February 2007 [**POL00118650**];
- xxix) The witness statement of Graham Brander, dated 21 February 2007 [**POL00064257**];
- xxx) The memo from Graham Brander, dated 27 February 2007 [**POL00118758**];
- xxxi) The memo from Miss Andrews, dated 1 March 2007 [**POL00091018**];
- xxxii) The memo from Miss Andrews, dated 15 March 2007 [**POL00048558**];
- xxxiii) The memo from Phil Taylor, dated 10 May 2007 [**POL00118619**];
- xxxiv) The memo from Juliet McFarlane, dated 14 May 2007 [**POL00119068**];
- xxxv) The memo from Juliet McFarlane, dated 30 May 2007 [**POL00118641**];
- xxxvi) The memo from Juliet McFarlane, dated 31 May 2007 [**POL00048761**] and the same document with comments attached [**POL00118868**];
- xxxvii) The memo from Juliet McFarlane, dated 6 June 2007 [**POL00048766**];
- xxxviii) The witness statement of Graham Brander, dated 25 June 2007 [**POL00064258**];
- xxxix) The memo from Graham Brander, dated 16 July 2007 [**POL00048905**];
- xl) The memo from Juliet McFarlane, dated 15 November 2007 [**POL00049154**];
- xli) The memo from Juliet McFarlane, dated 19 November 2007 [**POL00044388**];

- xlii) The indictment [**POL00048533**];
- xliii) The case opening [**POL00126356**];
- xliv) The witness list [**POL00118756**];
- xlv) The list of exhibits [**POL00118757**];
- xlvi) The Schedule of Non-Sensitive Unused Material [**POL00118755**];
- xlvii) The memo from Phil Taylor, dated 5 February 2008 [**POL00118858**]; and
- xlviii) The case closure report [**POL00057745**].

80. I have very little recollection of the details relating to this case, which I can see relates to an audit shortage in 2006.

81. I have no clear recollection of the circumstances in which I became involved in Ms Hamilton's case but they appear to have been covered in the document [**POL00067205**], which is an email chain relating to the fact that Ms Hamilton was asked to return circa £25,000 in excess cash but it didn't appear that this had been done.

82. As a Security Manager it would be my role to investigate the high value audit shortage that was identified. This would involve analysing POL documentation from the PO branch in question and any Horizon data requested, conducting interviews under caution and usually searches. In this particular case, I can see that searches weren't conducted, which was probably due to the fact that Ms Hamilton had been signed off work.

83. I cannot recall whose decision it was to conduct an audit at South Warnborough PO and it is not clear from the documentation that I have been sent, who was the person that requested the audit.

84. I have no recollection of the audit itself but see from the documentation that I was in attendance and witnessed it.

85. I cannot recall whose decision it was to attend Ms Hamilton's property on the day of the audit but can see from the documentation, that Ms Elaine Ridge, Area Intervention Manager had earlier obtained the PO keys from Ms Hamilton at her abode. From the documentation, it appears that the purpose of the visit, was for Ms Hamilton to be made aware of the amount of the deficit and in view of this, that Ms Ridge needed to precautionary suspend her. The purpose of my attendance was to advise Ms Hamilton that I would be conducting an investigation into the audit shortfall and would like to interview her.

86. From the documentation, I can see that I explained the nature of the interview, including her legal rights and the PO Friend rule. I can see that it is mentioned that Ms Hamilton had been GRO so I advised her to contact me when she felt able to be interviewed.

87. Other than advising Ms Hamilton of the above, I did not have any discussion with her, as I stated that I was not going to ask her any questions about the deficit at that time.

88. My understanding of the circumstances in which Ms Hamilton was suspended was due to the high value audit shortage.

89. I cannot say whether it was Elaine Ridge's decision to precautionary suspend Ms Hamilton, or whether she was instructed to do so by someone else from the retail line.

90. I have no recollection as to what enquiries were conducted before the decision to suspend Ms Hamilton was made. Until the audit, it was not known whether there would be a deficit identified, or what the amount was likely to be.

91. I cannot recall what further enquiries were made in relation to the shortfall identified at the audit. The enquiries that I conducted are covered in the offender report and memos, items [POL00047955], [POL00118745] and [POL00118610].

92. I have been asked to consider [POL00047137] and the record of interview from 5 May 2006 at [POL00044477] (commencing at 12:13 and concluding at 12:58) and at [POL00045409] (commencing at 13:09 and concluding at 13:32) in relation to some questions, in which I respond as follows:

i) As the Security Manager that was allocated this case then it would effectively have been my decision to interview Ms Hamilton as that would be the normal procedure in such an instance.

ii) Although I cannot recall this, I can see from my offender report [POL00044389] that I made disclosure to Ms Hamilton's solicitor prior to the interview. The disclosure would likely have been details of the audit shortage and any accounting documentation that was I intending to refer to during the interview.

iii) As the officer in the case, I would have taken the lead on the questions put to Ms Hamilton.

93. I cannot recall the details of the investigation conducted after the interview, although these appear to be covered in the documentation referred to in paragraph 79 above, in particular, items [POL00047955], [POL00118745] and [POL00118610]. I can see from the documentation that I obtained some Horizon printouts and accounting documents from South Warnborough PO, some Horizon data from Fujitsu, some information relating to cash declarations, details of calls made to the Helpdesk, and details of training materials supplied to Ms Hamilton in respect of Branch Trading. I can also see that I received from the PO Area Office in Bournemouth, some details relating to what appeared to be a pre-existing £112,000 debt that Ms Hamilton had declared to POL, prior to appointment as postmaster. I

can also see that I sought to obtain bank statements relating to Ms Hamilton. No searches appear to have conducted in this case, which I can only presume was due to Ms Hamilton being signed off work for some time.

94. I have no recollection of the sources of evidence that I considered during the course of the investigation, other than that covered in paragraph 93 above.

95. I would have submitted my offender report, further reports, any memos and emails to the Criminal Law Team and they would respond with their own memos and emails, in respect of things such as further enquiries and matters relating to the prosecution. The Criminal Law Team would advise on the sufficiency of the evidence.

96. I have been asked to consider [POL00044389], in relation to the Horizon printouts and accounting documentation that was obtained from South Warborough PO and my response to the questions asked are as follows:

i) I can see from the offender report [POL00044389] that in respect of analysing the Horizon printouts, it states that I was unable to find any evidence of theft or that the cash figures had been deliberately inflated. From my recollection of PO investigations in general, then certain Horizon printouts obtained from the PO branch could occasionally give an indication of criminality but other than the cash declarations, most were simply summaries of transaction conducted. In some situations, someone hiding a deficit in the accounts may declare the correct cash on hand figure, which would then show any discrepancy in the accounts, shortly followed by an inflated one, in order to effectively make the account balance. Although I cannot recall specific cases, there were also occasions whereby if someone was stealing money, that they may simply inflate the cash figure to achieve a balance, or a near balance, having already known roughly how much it was likely to be short. It may also be that the cash declaration was being inflated at the end of each day.

ii) I cannot recall the printouts that I viewed, but from my report I can see that a Horizon Event Log Balancing was obtained for the period 26 January 2006 – 09 March 2006. This generally showed one cash declaration being done each day and didn't show any occasions whereby what appeared to be a genuine cash figure would be declared followed by an inflated figure.

iii) A number of envelopes containing weekly accounting documentation were also obtained. Up until around January 2005 it appeared that each day's cash holding was manually entered on a sheet of paper. However, for some reason this appeared to cease after that time, as I did not find any of those sheets post January 2005. In my experience, some Postmasters or their staff, would enter the various cash denominations in a book or on paper, usually to keep a running total of the bulk notes and coins in the safe. At the end of the day, the working notes and coin (in the counter drawer) would be added to the bulk figures and the total of each denomination entered onto Horizon.

iv) A number of Cash Account Finals and Branch Trading Statements were obtained. (Horizon used to operate whereby the postmaster would produce a weekly balance (cash Account) but this changed at some point to producing a monthly Branch Trading Statement, although it was recommended that postmasters still balanced weekly). I completed a schedule detailing the cash on hand figures from week ending (w/e) 01/12/04 to the period ending 09/03/06. From this schedule it could be seen that between w/e 01/12/04) and w/e 30/03/05, the declared cash on hand remained fairly constant, generally fluctuating between £15,000 and £18,000. Between w/e 06/04/05 and w/e 29/06/05 it fluctuates between £18,000 and £20,000. From w/e 13/07/05 to period ending 08/02/06 it gradually rises from around £22,000 to £35,000.

97. Security Managers conducted the investigation and submitted case files to the Criminal Law Team who would advise on the sufficiency of the evidence as to whether criminal charges should be brought.

98. Any decision to prosecute would be made by the relevant Senior Security Manager. To the best of my recollection, Security Managers played no part in the decision to prosecute.

99. I cannot recall the circumstances relating to requesting call log details, in respect of South Warnborough PO, from the Network Business Support Centre (NBSC) and the Horizon Support Helpdesk (HSH), although the offender report suggests that it was in relation to references made in Ms Hamilton's prepared statement. I cannot recall what further steps were taken following the response from Ian Speck, although I can see that Andy Dunks (Fujitsu) produced details of HSH call logs in his statement. I can see from document [POL00118610] that I reported Mr Speck's response to our Criminal Law Team and associated a copy of his email response in Appendix C of the case file.

100.

i) From the documentation e.g. my further report, dated 11/08/06 [POL00118610], I can see that in Mrs Hamilton's prepared statement, she says that she received two weeks of half day training sessions. Also, in this report I can see that I was advised that when Ms Hamilton became postmaster, that she would have been asked if she required any training, and the records in the Area Office show that no training was required in this instance. Ms Hamilton was already working in South Warnborough PO for the previous postmaster. A copy of that record was placed in Appendix B of then case file.

ii) From the document [POL00118610] I can see that South Warnborough Post Office migrated to Branch Trading on 05 October 2005. It states that no visit would have been made to the Post Office but they were sent an Interactive Training CD ROM, a copy of the Transition Guide, a copy of the Quick Reference Guide, a Branch Trading Calendar and one each of the Branch Trading Balancing and Reporting manuals. It further states that each Postmaster would also have been invited to attend the numerous Face 2 Face events explaining the migration to

Branch Trading. It states that a number of offices requested replacement items or videos in exchange for the CD ROM. It states that there is no record of South Warnborough PO requesting a video.

101. I have been asked to consider [POL00048766] in relation to whether I found any evidence from Ms Hamilton's lifestyle "to illustrate where the money went", as instructed by counsel?

I have no recollection of this memo. I'm unsure what investigations into lifestyle that I would have been able to be conduct, as I can see from my offender report [POL00044389] that no searches were conducted, no doubt due to Ms Hamilton being [GRO] From my recollection, any financial documents seized from a search would have been the most likely way of finding any evidence relating to lifestyle. I can also see that Ms Hamilton signed authority for disclosure into her bank accounts, which I posted to the relevant banks, but it appears that bank statements were never received. It appears that my postal requests may not have been received by the relevant banks and I can see that I wrote to Ms Hamilton to ask her if she would sign further disclosure copies for me to submit, but it doesn't appear that Ms Hamilton responded to this further request. I reported this to the Criminal Law Team within my memo [POL00118610].

102. I have no recollection of any discussions that I may have had with counsel or POL's legal representatives regarding this case. Regarding disclosure, the Security Manager would submit the case file, including the Offender Report to the Criminal Law Team, and any additional reports and memos. If a case was committed to the crown court, then the Security Manager would prepare a committal bundle (copies of evidence, statements and Unused Material) and submit this to the Criminal Law Team, who would then deal with any disclosure to the Defence.

103. I have no knowledge or recollection of disclosure requests and as per paragraph 102 above, my understanding is that such requests would be dealt with by

the Criminal Law Team.

104. I have been asked to consider [POL00044481] and [POL00118757] in relation to disclosure from third parties e.g Fujitsu, whether ARQ logs were sought and if so, the period they covered.

105. I can see from the documentation provided to me that Penny Thomas provided a witness statement and produced as an exhibit, a period of Horizon data. I can see from my offender report that I submitted a request and subsequently received Horizon data covering the period 09 February 2006 - 08 March 2006, so can only assume that this is the Horizon data that Penny has produced within her statement. A copy of that statement would have been included within the committal bundle or produced as further evidence. I cannot recall whether the CD containing Horizon data was copied to the defence, but it would have been referenced in the committal bundle or further evidence and the defence would have been able to request a copy, if it hadn't previously been provided.

106. I have no recollection of the circumstances in which I requested a witness statement from Andy Dunks but it would appear from the documentation that this was at the request of the Criminal Law Team, in order to produce some HSH call logs.

107. I have been asked to consider [POL00048913] and to describe the circumstances in which I went to view the 'defence documentation', the purpose and what documents I viewed:

I have no recollection of viewing any Defence documentation, but item [POL00048913] refers to a visit I made to chambers and the documentation that I viewed, which appeared to be a lot of standard PO accounting documentation e.g. Cash Account Finals and Horizon printouts. I can see from the memo that there were 7 boxes, containing 91 ring binders of accounting documentation and included items

prior to when Ms Hamilton had become postmaster. I can see that I advised the Criminal Law Team that some Cash Account Finals, prior to the dates that I had previously scheduled, showed from October 2003 to November 2004 that the declared Overnight Cash Holdings totals were generally only around £8,000 – £14,000.

108. I have no recollection of any circumstances in which I was asked for my view on the acceptability of a guilty plea. I can see from [POL00049083] that I agreed with counsel's view but stipulated that any decision on accepting the basis of the plea, would be down to Dave Pardoe, who was a Senior Security Manager at the time.

109. I have no recollection of the memo from Ms McFarlane [POL00044388] whereby it states that "a plea on the basis that the loss was due to the computer not working properly will not be accepted" and cannot say what my view would have been at the time.

110. I have no recollection of memo [POL00048471] and am not sure that I would have had a view on the best way to proceed should Ms Hamilton not repay the outstanding loss, as I would have thought that this would be a legal matter, and for the Criminal Law Team to deal with.

111. I have no recollection of any further involvement that I had in this case once court proceedings had concluded, other than that I believe that I would of submitted the case file for closure.

112. I have no recollection as to whether I had any particular view, in respect of the proceedings against Ms Hamilton.

113. I have been asked what my reflections are now on the way the investigation and prosecution of Josephine Hamilton was conducted by the Post Office and the

outcome of the case and that I may wish to consider the Judgment of the Court of Appeal in Josephine Hamilton & Others v Post Office Limited [2021] EWCA Crim 577 at [POL00113278] (and in particular at paragraphs 142 to 148).

114. My response to the above, is that throughout my time as a Security Manager, and also, up until I left POL in 2017, it was always my understanding that the Horizon system was robust, as this was the message that was always instilled in everyone by POL, and I was not aware of any reference to 'bugs, errors or defects' relating to the integrity of Horizon. Although I cannot recall any specific examples, I understand from the documentation that I have received from the Inquiry that Fujitsu would in certain cases, supply an expert witness statement relating to the integrity of Horizon.

#### Prosecution of Julian Wilson

115. The Inquiry has asked me for a full and detailed account of the investigation and prosecution of Julian Wilson and to consider the following documents:

- i) The Record of Tape Recorded Interview dated 15 September 2008 [POL00050140] (part 1) and [POL00050128] (part 2);
- ii) Jarnail Singh's memo to the Fraud Team dated 6 January 2009 [POL00044806];
- iii) The Schedule of charges [POL00047083];
- iv) The Summary of Facts [POL00044767];
- v) The Financial Investigation Events Log [POL00044749];
- vi) The event capture form [POL00118275].

116. In respect of the Julian Wilson case, I am asked to consider [POL00118275], as in it, I am referred to as the Investigation Team Manager:

117. For a period of approx. 3 to 4 months in 2008, I was temporarily promoted to Security South Team Leader. I cannot specifically recall what I would have done as Team Leader, other than that I would allocate cases to the team, conduct one to

ones and chair any team meetings during that time. I can see that I retained my existing Security Manager caseload i.e. investigation cases, whilst also acting as Team Leader.

118. I have no recollection of the case involving Julian Wilson and am unable to say whose decision it was to conduct an audit at Astwood Bank PO branch.

119. I do not believe that I would have had any involvement in the audit, or have been in attendance.

120. Conducting an interview would have been standard procedure for a high value audit discrepancy case. The Security Manager allocated the case would arrange such an interview, and this would no doubt have been the case in respect of Mr Wilson.

121. I have no recollection, but there may have been materials disclosed by the officer in the case (Security Manager) to the legal representative of the person being interviewed.

122. I can see from the tape summaries that I was referred to as the second officer at the interview. My role would have been to support the officer in the case during the interview. I would also be able to ask questions of the person being interviewed.

123. I have been asked to provide details of my involvement (if any) in the investigation conducted after Mr Wilson was interviewed, as well as my view regarding how the prosecution was conducted, the outcome and whether I think anything should have been done differently.

124. My response to this is that I do not believe that I would have had any further involvement in this case, other than participating in the interviews. As such, I am

unable to comment on my views surrounding the prosecution and outcome of this case, or anything that possibly should have been done differently.

125. I have been asked for my reflections now on the way the investigation and prosecution of Julian Wilson and related criminal enforcement proceedings were conducted by the Post Office and the outcome of the case and advised that I may wish to consider the Judgment of the Court of Appeal in *Josephine Hamilton & Others v Post Office Limited* [2021] EWCA Crim 577 at [POL00113278] (and in particular at paragraphs 175 to 178), in addition to the documents referred to above.

126. As mentioned in paragraphs above, other than participating in the interviews, I do not believe that I would have had any further involvement in this case. Also, as mentioned in paragraph 114 above, I was not aware of any reference to 'bugs, errors or defects' relating to the integrity of Horizon at that time. POL had always instilled in us that it was robust and that there were no issues regarding its integrity.

#### Prosecution of Ms Lynette Hutchings

127. The Inquiry has asked me for a full and detailed account of the investigation and prosecution of Lynette Hutchings and to set out my recollection of this case, and that it may be that I assisted by the following:

- iv) The handwritten note at [POL00046065];
- v) The Audit Report dated 31 March 2011 at [POL00056292];
- vi) The Record of Tape Recorded Interview dated 20 April 2011 at [POL00056417] (part 1), [POL00044505] (part 2), [POL00046625] (part 3);
- vii) The prepared statement of Ms Hutchings [POL00056420];
- viii) The suspension letter, dated 30 March 2011 [POL00067173];
- ix) Ms Hutchings' antecedents [POL00046704];
- x) The Investigation Report (legal) dated 5 May 2011 [POL00046706];
- xi) The Investigation Report (personnel), dated 6 May 2011 [POL00044508];
- xiii) The HSD Call Log [POL00066754];

- xiv) The memo from Jarnail Singh dated 17 June 2011 [**POL00046626**];
- xv) The ARQ Requests, dated 21 June 2011 [**POL00056585**] and [**POL00056694**];
- xvi) The memo from Maureen Moors to Graham Brander, dated 21 June 2010 (appears to be a typo and should be 2011) [**POL00046627**];
- xvii) The memo from Maureen Moors to the Criminal Law Team (undated) [**POL00046088**];
- xviii) The witness statement of Andrew Dunks, dated 12 July 2011 [**POL00046615**];
- xix) The witness statement of Graham Brander, dated 11 August 2011 [**POL00056742**];
- xx) The witness statement of Adam Shaw, dated 20 September 2011 [**POL00046637**];
- xxi) The witness statement of Nigel Allen, dated 22 September 2011 [**UKGI00014819**];
- xxii) The witness statement of Louise Sheridan, dated 24 November 2011 [**POL00057230**];
- xxiii) The witness statement of Graham Brander, dated 25 November 2011 [**POL00063481\_008**];
- xxiv) The memo from Graham Brander to Jarnail Singh, dated 9 December 2011 [**POL00046628**];
- xxv) The Advice and Proposed Charge drafted by Martin Smith of Cartwright King [**POL00057362**];
- xxvi) The indictment [**POL00046097**];
- xxvii) The status report, dated 21 March 2012 [**POL00057528**];
- xxviii) The Schedule of Non-Sensitive Unused Material, dated 14 May 2012 [**POL00057752**];
- xxix) The letter from Cartwright King, dated 22 May 2012 [**POL00057796**];
- xxx) The brief to prosecution counsel, dated 2 July 2012 [**POL00058081**];
- xxxi) The handwritten note outlining the false accounting charge [**POL00046095**];
- xxxii) The attendance note, dated 30 July 2012 [**POL00058132**];
- xxxiii) The basis of plea [**POL00046096**]; and

xxxiv) The attendance note, dated 24 August 2012 [**POL00058236**].

128. I have no recollection of this case, but it appears that it was allocated to me, and relates to an audit shortage at Rowlands Castle PO branch in 2011. My role would have been to conduct an investigation into the audit shortage.

129. I am unable to say whose decision it was to conduct an audit at this branch, but from the documentation, it appears that this was requested due to the postmaster being asked to return £30,000 but they only sent back £14,000.

130. I do not believe that I would have had any involvement in the audit at Rowlands Castle PO on 30 March 2011. I have no recollection, but do not believe that I was present during the audit, so if this was the case, then I would not have had any discussion with Ms Hutchings at that PO branch.

131. I am unable to describe the circumstances relating to the suspension of Ms Hutchings as this would have been dealt with by someone from the retail line. It would appear from the auditor's report that Mr Nigel Allen, PO Contracts Advisor dealt with the suspension.

132. I have no recollection of what enquiries may have been conducted before the decision to suspend Ms Hutchings was made.

133. As mentioned above, I have no recollection of this case, but from my offender report, I can see that I obtained details of overnight cash holdings (ONCH), remittances and details of 4 call log entries from the Cash Management Team. I can see that I obtained a copy of the audit report and some accounting documentation pertaining to Rowlands Castle PO.

134. I have been asked to consider [**POL00046607**] and the Record of Tape

Recorded Interview dated 20 April 2011 at [POL00056417] (part 1), [POL00044505] (part 2), [POL00046625] (part 3) and the statement at [POL00056420], and to address the following;

- ii) Who made the decision to interview Ms Hutchings?
- iii) What pre-interview disclosure (if any) was provided to Ms Hutchings?
- iiii) What was your role during the interviews?

135. My response to the above, is that from the documentation, I can see that this case was allocated to me for investigation and as part of this, it would be normal practice to conduct interviews. As such, I can see that I have written to Ms Hutchings, inviting her to an interview and explaining her rights. I can see from my offender report [POL00046706] that disclosure was made to Ms Hutchings' legal representative prior to the interview. Although I cannot recall what items were disclosed, it would most likely have been some accounting documentation relating to Rowlands Castle PO as well as verbal disclosure relating to the audit shortage. As the Security Manager that was allocated the case, it would have been my role to lead on the interview.

136. I have no recollection as to what enquiries I made as part of this investigation but from the offender report I can see that I obtained a copy of the audit report, a schedule of overnight cash holdings (of which I produced a schedule), cash remittances and a log of calls made to Rowlands Castle PO by the Cash Management Team. I also received from Nigel Allen, Contracts Advisor, some Branch Trading Statements and Horizon printouts, which I understand were sent to him by the auditor. I can see that I was made aware of 2 pending errors in relation to Cheques remitted out and can see from the report that I accessed Credence and it appeared to me that these were genuine errors. I also obtained a schedule of call logs made to the POL Helpdesk from Rowlands Castle PO. Following the interview, Ms Hutchings was given some bank disclosure forms and was asked if she was prepared to grant authority for me to request copies of her bank statements. It is

unclear whether these were ever signed and returned to me, as in my offender report, I state that these are still outstanding. I have no recollection of the sources of evidence that I would have considered, and what I have referred to above is based on details within the offender report.

137. As far as I am aware, the only legal advice that would have been obtained, would have been from the Criminal Law Team in relation to any charges, further enquiries requested and in relation to the prosecution. I would not have been involved in the decision to charge Ms Hutchings nor with the decision to authorise the prosecution. The Criminal Law Team would advise on the sufficiency of the evidence and if appropriate, formulate charges. The decision on whether to prosecute or not, would be made by a senior security manager. I cannot recall any discussions that I may have had with counsel or POL's legal representatives in respect of this case.

138. Regarding disclosure, the Security Manager would submit the case papers to the Criminal Law Team, including the offender report and any additional reports and memos. If a case was committed to the crown court, then the Security Manager would prepare a committal bundle (copies of evidence, statements and Unused Material) and submit this to the Criminal Law Team, who would then deal with any disclosure to the Defence. I have no recollection of any disclosure requests made by the Defence, or what POL's response may have been.

139. On 21 March 2012, this case was transferred to Steve Bradshaw, Security Manager as I was moving to a new role within the Network Transformation Team in POL.

140. I cannot recall what I, or anyone else involved in the proceedings may have considered in respect of disclosure from third parties e.g Fujitsu. I can see from the documentation that Andrew Dunks (Fujitsu) provided a statement, in which he refers

to a number of calls to the HSH from Rowlands Castle PO. The request is to cover the period from 01/10/2010 – 30/03/2011. It appears that this was at the request of the Criminal Law Team. This request would have been submitted to Fujitsu by the POL security admin team that dealt with all requests to Fujitsu for Horizon data, HSH call logs and statements. I cannot recall what this admin team was called. I cannot see from the documentation, but it is likely that I would have been the one to forward the Criminal Law Team's request for a schedule of calls to HSH over this period, to be produced in a statement from Fujitsu.

141. I do not recall that I would have had any involvement in considering Ms Hutchings' basis of plea, and believe that Mr Bradshaw would be dealing with the case at that stage. I do not recall having any further involvement in this case, after it was transferred to Mr Bradshaw.

142. I have been asked for my reflections now on the way the investigation and prosecution of Lynette Hutchings was conducted by the Post Office and the outcome of the case and that I may wish to consider the judgment of the Court of Appeal in *Josephine Hamilton & Others v Post Office Limited* [2021] EWCA Crim 577 at [POL00113278] (and in particular at paragraphs 75, 91, 198 to 209).

143. As mentioned in paragraphs 114 & 126 above, I was not aware of any reference to 'bugs, errors or defects' relating to the integrity of Horizon at that time. POL had always instilled in us that the Horizon system was robust.

#### General

144. I have been asked to what extent (if any) did I consider a challenge to the integrity of Horizon in one case to be relevant to other ongoing or future cases: My response is that I have no recollection of any specific challenges to the Integrity of Horizon. My understanding from the documentation provided is that if a challenge was made by the Defence then this would be referred to Fujitsu to give a view, and

to provide a statement and asked to rebut anything, if indeed they were able to. I cannot recall any instances where any challenge to Horizon was upheld by the court.

**Statement of Truth**

I believe the content of this statement to be true.

**GRO**

Signed: \_\_\_\_\_

Dated: 30/10/23\_\_\_\_\_

**Index to First Witness Statement of Graham David Brander**

<b>No.</b>	<b>URN</b>	<b>Document Description</b>	<b>Control Number</b>
1	POL00104747	Investigation Policy: Casework Management (England & Wales) v1.0	POL-0080387
2	POL00104777	Investigation Policy: Casework Management (England & Wales) v4.0	POL-0080417
3	POL00104754	Investigation Policy: Rules & Standards v2.0	POL-0080394
4	POL00030687	Investigation Policy - Investigation Procedures v2 January 2001	POL-0027169
5	POL00104762	Investigation Policy: Disclosure of Unused Material, Criminal Procedures and Investigations Act 1996 Codes of Practice v0.1	POL-0080402
6	POL00030578	S02 Royal Mail Group Criminal Investigation and Prosecution Policy December 2007	POL-0027060
7	POL00104812	Royal Mail Group Ltd Criminal Investigation and Prosecution Policy	POL-0080444
8	POL00104806	Royal Mail Group Security – Procedures and Standards: Standards of behaviour and complaints procedure No.10-X v2	POL-0080438
9	POL00031003	Royal Mail Group Crime and Investigation Policy v1.1 October 2009	POL-0027485
10	POL00030580	Post Office Ltd - Security Policy: Fraud Investigation and Prosecution Policy v2	POL-0027062
11	POL00030579	Post Office Ltd Financial Investigation Policy, May 2010	POL-0027061
12	POL00026573	RMG Procedures & Standards - Proceeds of Crime Act 2002 & Financial Investigations doc 9.1 V1	POL-0023214
13	POL00104857	Royal Mail Group Security Procedures & Standards: Initiating Investigations doc 2.1	POL-0080489
14	POL00031008	RMG Ltd Criminal Investigation and Prosecution Policy v1.1 November 2010	POL-0027490
15	POL00104853	Post Office's Financial Investigation Policy	POL-0080485
16	POL00104855	Post Office Ltd. Anti-Fraud Policy	POL-0080487

17	POL00030786	Royal Mail Group Policy - Crime and Investigation (S2) v3 effective from April 2011, owner Tony Marsh, Group Security Director	POL-0027268
18	POL00105229	Post Office Ltd PNC Security Operating Procedures	POL-0080854
19	POL00104929	Post Office Limited: Internal Protocol for Criminal Investigation and Enforcement (with flowchart)"	POL-0080561
20	POL00105226	Undated Appendix 1 - POL Criminal Investigations and Enforcement Procedure (flowchart)	POL-0080851
21	POL00104968	POL - Enforcement and Prosecution Policy (with comments)	POL-0080600
22	POL00030602	POL: Criminal Enforcement and Prosecution Policy	POL-0027084
23	POL00031005	Conduct of Criminal Investigations Policy - version 0.2	POL-0027487
24	POL00027863	Conduct of Criminal Investigations Policy v0.3	POL-0024504
25	POL00030902	Final Draft of the Post Office Conduct of Criminal Investigation Policy	POL-0027384
26	POL00104821	Condensed Guide for Audit Attendance v2	POL-0080453
27	POL00118096	Email from Andrew Wise to Michael Stanway forwarding an email re Casework Compliance	VIS00012685
28	POL00118108	Appendix 1 - Case Compliance checklist. Undated (date taken from parent email)	VIS00012697
29	POL00118109	Appendix 2 - File construction and Appendixes A, B and C: "Compliance Guide: Preparation and Layout of Investigation Red Label Case Files" Undated - date taken from parent email	VIS00012698
30	POL00118101	Appendix 3 - Offender reports and Discipline reports: Compliance Guide to the Preparation and Layout of Investigation Red Label Case Files - undated (date taken from parent email)	VIS00012690
31	POL00118102	Appendix 4 - Offender reports layout: "POL template Offender Report (Legal Investigation)" - undated (date taken from parent email)	VIS00012691

32	POL00118103	Appendix 5 - Discipline reports layout: "POL template Offender Report (Personnel Investigation)" - undated (date taken from parent email)	VIS00012692
33	POL00118104	Appendix 6 - Identification codes (undated - date taken from parent email)	VIS00012693
34	POL00118105	Appendix 7 - Tape Interviews. "POL Security Operations Team guide: Summarising of Tape Recorded Interviews." Undated - date taken from parent email	VIS00012694
35	POL00118106	Appendix 8 - Notebooks: Guidance on using notebooks in investigations. Undated (date taken from parent email)	VIS00012695
36	POL00118107	Appendix 9 - Case Progression Toolkit. Undated (date taken from parent email)	VIS00012696
37	FUJ00153133	Seema Misra Criminal Case Study: Email chain from Penny Thomas to John Longman re: Duplication of Transaction Records in ARQ Returns	POINQ0159328F
38	FUJ00125911	Email chain from Thomas Penny to Mark Dinsdale re: Horizon/Post Office Systems	POINQ0132125F
39	FUJ00154911	Email from Jane M Owen to Andy Dunks Re: Fujitsu Statement POLTD/0809/560-568	POINQ0161106F
40	FUJ00154925	Email from Mark Dinsdale to Penny Thomas re: Fujitsu Information – Bufferey	POINQ0161120F
41	FUJ00156494	Email from Bains Rajbinder to Thomas Penny RE ARQ Retrieval Data	POINQ0162688F
42	FUJ00156530	Email from Gareth Jenkins to Thomas Penny RE RM v Bramwell	POINQ0162724F
43	FUJ00156536	Email from Penny Thomas to Gareth Jenkins RE FW RM V Bramwell	POINQ0162730F
44	FUJ00154903	Email from Jane M Owen to Andy Dunks, Thomas Penny and Mark Dinsdale re Fujitsu statement POLTD/0809/560-568	POINQ0161098F
45	FUJ00155009	Email from Graham Brander to Andy Dunks, CSPOA Security, Penny Thomas and others re: RE:	POINQ0161204F

		Swiss cottage Fujitsu Statements - urgent please	
46	FUJ00225238	Email chain from Penny Thomas to Jane Owen re: ARQ Retrieval Data	POINQ0231355F
47	POL00067205	Email from Adrian Skinner to Elaine Ridge, cc Nigel Allen, Area Intervention Office and others re: South Warnborough 0929042 (Jo Hamilton case study)	POL-0063684
48	POL00044497	Letter from Alan Stuart to Nigel Allen re: Audit of Post Office South Warnborough branch	POL-0040976
49	POL00047137	Letter from Graham Brander to Mrs Hamilton, Re: investigations	POL-0043616
50	POL00118743	Josephine Hamilton Criminal Case Study: Letter from Graham Brander to Josephine Hamilton re: invite for a formal interview	POL-0118662
51	POL00118769	Josephine Hamilton case study. Memo from Graham Brander to Ged Harbinson regarding progress of the case.	POL-0118688
52	POL00044477	Josephine Hamilton record of tape recorded interview	POL-0040956
53	POL00045409	Record of Tape Recorded Interview: Part 2 - Josephine Hamilton interviewed by Graham Brander	POL-0041888
54	POL00044389	Post Office Ltd Investigation report for Josephine Hamilton - POLTD/0506/0685 (Prepared by Graham Brander, Investigation Manager)	POL-0040868
55	POL00047955	Josephine Hamilton Offences Report	POL-0044434
56	UKGI00001504	Josephine Hamilton case study - Suspect Offender Reporting re: Josephine Hamilton	UKGI012318-001
57	POL00044470	Josephine Hamilton Case Study - Financial investigation events log - case number: POLTD/0506/0685	POL-0040949
58	POL00064288	Memo from Graham Brander RE Notification of the commencement of investigation into Jo Hamilton	POL-0060767
59	POL00118739	Josephine Hamilton case study. Letter from Graham Brander to Alliance & Leicester Commercial Bank re: Requesting disclosure of	POL-0118658

		Josephine Hamilton's bank statements	
60	POL00048035	Josephine Hamilton case study: Memo from Julie MacFarlane to POL Investigation team and Graham Brander	POL-0044514
61	POL00118745	Letter from Graham Brander to Nationwide Building Society re. disclosure of bank details re: J Hamilton.	POL-0118664
62	POL00048223	Letter from Graham Brander to Josephine Hamilton re Bank Authority Disclosures.	POL-0044702
63	POL00118610	Memo from Graham Brander to Juliet McFarlane Re Hamilton POLTD/0506/0685	POL-0118529
64	POL00048205	Memo from Julie MacFarlane to POL Investigation team - Advice on Prospect of success of conviction J Hamilton – Unsigned	POL-0044684
65	POL00118760	Josephine Hamilton case study. Letter from Graham Brander to North East Hampshire Magistrates Court with attachments	POL-0118679
66	POL00118761	Josephine Hamilton criminal case study: Summons for Josephine Hamilton	POL-0118680
67	POL00048252	Memo from Graham Brander to Julie MacFarlane re Confirmation summons served on Josephine Hamilton	POL-0044731
68	POL00048269	Jo Hamilton Case Study: Memorandum from Juliet McFarlane to Investigation Team Post Office Limited cc Graham Brander and Press Office. Re: "Royal Mail Group plc v Josephine Hamilton Aldershot Magistrates Court - 6th December 2006 at 10am".	POL-0044748
69	POL00118768	Letter from Graham Brander (Post Office) to Tanner & Taylor Solicitors regarding a copy of the interview tapes - Josephine Hamilton case study	POL-0118687
70	POL00118762	Josephine Hamilton case study: Information on Hearing, Magistrates Courts	POL-0118681
71	POL00044484	Post Office Witness Statement - Graham Brander	POL-0040963

72	POL00044481	Post Office Witness Statement of Penelope Anne Thomas	POL-0040960
73	POL00118754	Josephine Hamilton case study. Memo from Graham Brander to Juliet McFarlane regarding committal papers	POL-0118673
74	POL00048473	Jo Hamilton Case Study: Memo from J McFarlane to G Brander and G Harbinson - Update on Committal papers J Hamilton	POL-0044952
75	POL00118650	Memo from Juliet McFarlane to Investigation Team Post Office Limited CC Graham Brander re R v Josephine Hamilton - Plea and Case Management Hearing & non-sensitive unused schedule.	POL-0118569
76	POL00064257	Josephine Hamilton case study: Witness Statement Graham Brander	POL-0060736
77	POL00118758	Josephine Hamilton case study. Letter from Graham Brander to Juliet McFarlane re: Josephine Hamilton (POLTD/0506/0685) - Additional Witness Statements	POL-0118677
78	POL00091018	Memo from Royal Mail Legal Services to Post Office Security ccing Christopher Knight re: Regina v Alison Loraine Hall - Leeds Crown Court - Plea and Case Management Hearing - 30th June 2011 at 9:30am. Case No: POLTD/1011/0095	POL-0090662
79	POL00048558	Memo from J Andrews to POL Investigation Team and G Brander, RE: Update on Directions (R v. Hamilton)	POL-0045037
80	POL00118619	Memo from Phil Taylor to Investigation Team Post Office Limited CC Graham Brander re: R v Josephine Hamilton - Trial - 10th September 2007	POL-0118538
81	POL00119068	Josephine Hamilton Case Study: Memo from Juliet McFarlane to POL Investigation Team cc Graham Brander Re: Regina v Josephine Hamilton Winchester Crown Court Mention-25th May 2007 Trial-10th September 2007 Case No:POLTD/0506/0685	POL-0118987

82	POL00118641	Memo from Juliet McFarlane to Investigation Team Post Office Limited c.c. Graham Brander and Press Office re R v Josephine Hamilton	POL-0118560
83	POL00048761	Memo from Ms Juliet McFarlane to POL Investigation Team and Graham Brander re: Regina v Josephine Hamilton Winchester Crown Court Trial - 10th September (POLTD/0506/0685)	POL-004524 0
84	POL00118868	Memo of the Investigation Team Post Office Limited, in the Regina v Josephine Hamilton, in the Winchester Crown Court. Court Trial 10/09/2007. Responses made to the points made CASE NO: POLTD/0506/0685	POL-0118787
85	POL00048766	Memo by Juliet McFarlane to Investigation Team Post Office Limited and Graham Brander re Regina v Josephine Hamilton. POLTD/0506/0685.	POL-0045245
86	POL00064258	Josephine Hamilton case study: Witness Statement of Graham Brander	POL-0060737
87	POL00048905	Memo from G Brander to J McFarlane – Jo Hamilton - list of additional statements	POL-0045384
88	POL00049154	Josephine Hamilton Case Study: Memo from Juliet McFarlane to POL Investigation Team and others re: Regina v Josephine Hamilton (South Warnborough) Winchester Crown Court Mention - 19th November 2007 (POLTD/0506/0685)	POL-0045633
89	POL00044388	Josephine Hamilton case study: Memorandum from Miss J A McFarlane to Investigation Team Post Office Limited, cc Graham Brander, Ged Harbinson and Dave Pardoe RE: R v Josephine Hamilton mentions hearing 19/11/2007 - update after hearing	POL-0040867
90	POL00048533	Criminal indictment for Josephine Hamilton	POL-0045012
91	POL00126356	Josephine Hamilton Criminal Case Study: Bundle of documents re: Regina v Josephine Hamilton	POL-0132433

		including Case Opening statement and Memo from Graham Brander to Juliet McFarlane dated 11/08/2006 re Audit report of South Warnborough PO branch.	
92	POL00118756	Josephine Hamilton case study. Witness list for R v Josephine Hamilton	POL-0118675
93	POL00118757	Josephine Hamilton case study - List of exhibits	POL-0118676
94	POL00118755	Josephine Hamilton criminal case study. Schedule of non-sensitive unused material signed by Graham Brander	POL-0118674
95	POL00118858	Criminal case study of Josephine Hamilton: Royal Mail Memo from Phil Taylor to Investigation Team POL, cc Graham Brander and Press Office re: R v Josephine Hamilton- Contains charges and sentences	POL-0118777
96	POL00057745	Jo Hamilton Case Study: Email from Graham Brander to Nigel Allen, Geb Harrison, Colin Price and others re Case Closure Reporting	POL-0054224
97	POL00048913	Email from Graham Brander to Juliet McFarlane, Dave Posnett and Investigation Team Post Office re Josephine Hamilton. POLTD/0506/0685.	POL-0045392
98	POL00049083	Email from Graham Brander to Jennifer Andrews, Juliet McFarlane, Dave Pardoe and others re: Fw: Hamilton	POL-0045562
99	POL00048471	Jo Hamilton case study - Email from Jennifer Andrews to Graham Brander re Josephine Hamilton	POL-0044950
100	POL00113278	Approved Judgment between Josephine Hamilton & Others and Post Office Limited	POL-0110657
101	POL00050140	Transcript: Record of tape interview in re to Julian Wilson dated 15/09/2008	POL-0046619
102	POL00050128	Transcript: Record of tape recorded interview in re to Julian Wilson.	POL-0046607
103	POL00044806	Julian Wilson case study: Memo from Jarnail Singh to the Fraud	POL-0041285

		Team Post Office Ltd re: POL v Julian Wilson (Astwood Bank)	
104	POL00047083	Julian Wilson Case Study: Post Office Limited V Julian Wilson - Schedule of Charges	POL-0043562
105	POL00044767	Summary of facts re: Royal Mail Group Ltd v Julian Wilson	POL-0041246
106	POL00044749	Financial investigation events log - Case number: 0809/126 Gary Thomas - Astwood Bank/ Julian Wilson	POL-0041228
107	POL00118275	Compliance Team - Event Capture Form for Mr Julian Wilson	POL-0118417
108	POL00046065	Statement for Rowlands Castle - Lynette Hutchings	POL-0042544
109	POL00056292	Audit Report of Rowlands Castle Post Office 2011	POL-0052771
110	POL00056417	Lynette Hutchings Case Study : Record of Taped Interview of Lynette Hutchings dated 20/04/2011	POL-0052896
111	POL00044505	Record of Taped Interview with Lynette Hutchings	POL-0040984
112	POL00046625	Transcript: Record of taped interview re Lynette Hutchings dated 20/04/2011	POL-0043104
113	POL00056420	Handwritten statement on behalf of Lynette Jane Hutchings	POL-0052899
114	POL00067173	Lynette Hutchings case study: Letter sent from Nigel Allen to Mrs L K Hutchings re: SPMs Suspension	POL-0063652
115	POL00046704	Antecedents in re to Lynette Jane Hutchings	POL-0043183
116	POL00046706	Investigation report by Graham Brander - Subpostmaster Lynette Jane Hutchings.	POL-0043185
117	POL00044508	Post Office Ltd Investigation report for Lynette Jane Hutchings (prepared by Graham Brander)	POL-0040987
118	POL00066754	Incident Activity Report for November 2007	POL-0063233
119	POL00046626	Memo from Jarnail Singh to Maureen Moors and Graham Brander in re to Post office LTD v Lynette Jane Hutchings	POL-0043105
120	POL00056585	Audit Record Query, Rowlands Castle Post Office	POL-0053064

121	POL00056694	Audit Record Query, Rowlands Castle Post Office	POL-0053173
122	POL00046627	Internal Post Office memo from Maureen Moors (Fraud Team) to Graham Brander (Fraud Advisor) re Lynette Hutchings (Rowlands Castle Post Office) - Request for further evidence from the Royal Mail Group Criminal Law Team	POL-0043106
123	POL00046088	Memo from Maureen Moors to RMG criminal law team re Fraud and prosecution to be pursued	POL-0042567
124	POL00046615	Lynette Hutchings case study: Witness Statement of Andrew Paul Dunks	POL-0043094
125	POL00056742	Witness Statement for Gary Thomas, Post Office Ltd	POL-0053221
126	POL00046637	Lynette Hutchings case study: unsigned witness statement of Adam Shaw	POL-0043116
127	UKGI00014819	Lynette Hutchings case study: Royal Mail Group, draft witness statement for Nigel Allen	UKGI025612-001
128	POL00057230	Lynette Hutchings Case Study: Louis Sheridan Witness Statement	POL-0053709
129	POL00063481_008	Graham Bender Witness Statement - Rowlands PO prosecution, information on Brander's investigation and analysis of Horizon. Unsigned and incomplete	POL-0059960_008
130	POL00046628	Memo from Graham Brander to Jarnail Singh in re to Ms Hutchings.	POL-0043107
131	POL00057362	Lynette Hutchings Case Study: POL v Lynette Jane Hutchings – Advice	POL-0053841
132	POL00046097	Indictment - Regina v Lynette Jane Hutchings - Hutchings charged with fraud	POL-0042576
133	POL00057528	Interim/Current Status Report - Lynette Hutchings 2012	POL-0054007
134	POL00057752	Unused material schedule - Lynette Jane Hutchings	POL-0054231
135	POL00057796	Letter from Cartwright King to Messrs. Coomber Rich re: Post Office Ltd v Lynette Jane Hutchings (Portsmouth Magistrates Court on 06/06/2012)	POL-0054275

136	POL00058081	Post Office Ltd v Lynette Hutchings	POL-0054560
137	POL00046095	Handwritten note on Regina v Lynette Jane Hutchings	POL-0042574
138	POL00058132	Lynette Hutchings case study: Court attendance note of William Martin Counsel for Claimant	POL-0054611
139	POL00046096	Handwritten notes on Regina v Lynette Jane Hutchings: basis of plea	POL-0042575
140	POL00058236	Lynette Hutchings Case study: Attendance note by William Martin	POL-0054715
141	POL00046607	Letter from Graham Brander to Mrs Hutchings re: invitation for interview re audit deficiency	POL-0043086