

Witness Name: David John Pardoe

Statement No.: WITN08170100

Dated: 24<sup>th</sup> October 2023

**POST OFFICE HORIZON IT INQUIRY**

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**FIRST WITNESS STATEMENT OF DAVID JOHN PARDOE**

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I, David John Pardoe, 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 17 August 2023 (the "**Request**").
2. I come from a family of Postmasters; my late father owned and ran a Post Office in the Northwest of England from the 1950s and his mother held the position before that.
3. Given my family ties with the Post Office, then from a very young age I could successfully perform Post Office transactions and I used to run my father's Post Office for him whilst he went away on holiday. I initially commenced my career within the Civil Service, but as a young man, perhaps aged 19 or so, I

applied for and was successful in securing a Post Office Crown Officer counter clerk role in the Warrington area.

4. I then quickly progressed from counter clerk and held several administrative roles within the Liverpool District. One role was to design and deliver SPMR onsite training. Prior to this initiative new or incoming SPMRs had been trained by the outgoing. This was proving to be increasingly unsatisfactory as any bad habits or flawed transactional processes were being immediately inherited by the new SPMR. The revised training saw specialist training delivered by one of two trainers. As such, I travelled across the Northwest of England providing two-week training inductions and refresher courses.
5. One day I was catching up on administrative work within the District Office in Liverpool. I was approached by two individuals who I knew worked for the Post Office Investigation Department - POID. This was the function that provided investigation services to all elements of Post Office including Royal Mail, Parforce, Post Office Ltd and CASHCO (the cash carrying arm of Post Office). The individuals asked me if I would consider working in an inner-city branch that was under investigation for dishonesty. I agreed and I worked in the Post Office branch for several months and supported a covert surveillance operation. The operation was in connection to benefit payment book fraud.
6. The operation concluded satisfactorily, and I received recognition for my support. Shortly after I was offered the role of the Investigation Liaison Officer; this role saw me act as the interface between the Liverpool Post Office District and POID. The role involved taking reports of crime and suspected crime

events, documenting them, and reporting them for intervention by POID. This was very much an interface role and would not initially have led or supported PACE investigative interviews or similar activity. I think that this would have been around 1991.

7. I have asked the Post Office IT Inquiry team for detailed personnel print out of the roles and role moves I held from around 1991. I genuinely do not wish to appear evasive but do need support to aide my memory. I have held several roles in the function and some will be of more interest to the Inquiry than others.
8. There was minimal training given to discharge the POID interface role and certainly nothing formal. I do seem to recall spending a week or two with my predecessor, but the role was very much around reporting cases, providing employee details obtained from HR, gathering witness information and so on. In fairness, I didn't feel ill-equipped to perform the role as the technical elements were delivered outside of my pay grade.
9. Throughout this period the business was going through a sizeable number of changes. In fact, change seemed a constant within the business, and this led to the amalgamation of Post Office administrative structures for Liverpool, North Wales and Manchester areas into one North West and North Wales Region. The Regional office ended up in Salford.
10. Shortly after this, the Region started to encourage me and one other Liaison Investigator to get closer involved in investigations that were being submitted to POID. I don't know the reason why. It was just a belief from some strong

stakeholders that we should be closer to the conduct of our own investigations. This started to see me conduct investigations in a supporting role as second officer.

11. I do recall this was the start of formal training. I seem to recall that at this time I received classroom training delivered by Royal Mail Group and access to other training materials. I was also very heavily mentored by an experienced and far more senior investigation manager, and this would see every element of my work supervised. Again, I could do to reference with career details surely held by the Post Office to provide dates with greater clarity. Given the time that has elapsed I suspect that none of the training materials / methodology will be available to the Inquiry.

12. The business continued into a state of flux. At the time, POID were being split into the various Post Office business units. When this happened, I moved into the newly formed Regional Security Department, had a substantive investigator, as my line manager, and a Regional Head of Security. I seem to recall that my job title also changed to that of Assistant Investigator.

13. This period saw me receive significantly more training both formally and informally. It's difficult to recall the timeline, but at various stages in an operational role I received classroom investigative training, internally and externally delivered courses around search awareness (using Metropolitan Police facilities), interviewing course with Lancashire Constabulary, PACE training, RIPA awareness and CPIA awareness. Elements such as PACE, RIPA, HRA and CPIA were supplemented with various materials that were

intended for retention. PACE and CPIA codes of practice would have been available within every interview kit. I still recall having the codes in my investigation kit. In my Post Office career, I also studied and passed my Proceeds of Crime Act Senior Appropriate Officer. This was a pass fail one week course delivered by the National Police Improvement Agency.

14. During my career in the function I also undertook other lines of role and academic learning; I hold a certificate and diploma in management and am a holder of an MSc in Security & Risk Management attained from Leicester University. My MSc centered on organisational crime risk and was completed in September 2000 by submission of an academic study on the reasons why SPMRs committed offences of theft and wrongdoing and therefore rendered themselves liable to prosecution. The work was entitled with complete irony "There Must Be Some Mistake"; this referenced that SPMRs were shocked, in the main, that their behavior led to suspension and prosecution. I'm struggling to find a copy of the work and presume it's lost during a number of house moves. I do recall that several subjects were citing unexplained losses as being the cause of their downfall, but these were ordinarily attributed to sneak thefts or a reluctance to provide full and frank explanations. This study would have been completed pre-Horizon.

15. As an Assistant Investigator my role was to, predominantly, support field investigation into allegations of dishonesty. I would not lead on interviews under caution but would rather support with investigation questions around the daily and weekly accounts.

16. Again, I would need reference to Post Office HR details, but I then became a substantive lead Investigator. This move was supported by additional training and my lead work (first officer interviews, file preparation and so on) was highly supervised to the extent that even grammatical errors within reports would be returned for correction - that was the standard of supervision. Even after this promotion to lead Investigator I remained in supervision for many, many months and certainly longer than for any professional role I have held subsequently. I don't think that was any reflection on my ability to progress at pace, it was just the way it was. There was a recognition that the role was unique and required a high level of interpersonal skill and confidence to deploy effectively.

17. There followed a further series of team restructures, building moves and boundary moves. The function throughout the years if not decades always struck me as an easy target to drive headcount reduction. Indeed, later in my career I was performing the role of consultation manager for a long serving colleague who had been subject to redundancy. I was to follow a party line around change being a business necessity... when the colleague abruptly stopped me and proceeded to produce a piece of paper and recount the 14 restructures they had been personally impacted by since joining the Post Office – the majority in the security field. That was the regularity of structure change.

18. Nevertheless, I seemed to escape the inevitable culling and received a number of role moves and promotions. I was involved in a significant range of operational activity within the Security function. Again, I need an aide to

memory in terms of precise dates and durations, but roles included Investigation team leader and further promotions to national roles and to Senior Security Manager. The later saw me, at stages, involved in working as a Commercial Security Manager with client managers to assure new and existing products and services, a separate role dealing with physical crime mitigation, a separate role dealing with operational investigations, a separate role dealing with crime intelligence (under a basket of services called Grapevine) and administration for the function, along with two or more significant periods dealing with organisational design (headcount reduction) and the move of Post Office Counters Ltd to Post Office Ltd in 2001. Some of these periods would see removal and secondment from my substantive role for periods of up to 12 months.

19. Throughout my career my reporting lines both up and down varied significantly. From recollection I reported at periods into Susan TOMS (HR lead NW Region), Jim McLeish, Tony UTTING, Duncan McFadyen and latterly in my career John SCOTT (Head of Security). My span of control also varied significantly, and I can recall working without any direct reports, through to an operational Senior Security Manager leading a team of 15 or 20 via several team leaders and direct reports. In terms of competence and professionalism of colleagues and managers, then given my varied roles and length of service then that's a difficult one. I worked with some fantastic individuals who were highly capable and committed to doing their role to the best of their ability. I worked with others who were less so and who would be managed accordingly. Overall, the investigators were competent. We had, in

the team, recent police officers and to be honest their application of the role and understanding and use of impacting legislation was no better or worse than incumbents who had progressed through a non-policing route, so I suppose that must give some credit to Post Office grown talent and incumbents.

20. I left the Post Office in 2014. I was tired of the London commute and living away from home. I was also increasingly worn out by the prevailing Security Team culture. I would say, from the outset, that I do have an issue with several prosecution decision making activities and subsequent inputs I am asked to comment on later in this statement; my memory is that I left the operational Fraud Strand / Security Operations, to become the lead for crime intelligence and administrative support under the generic term Grapevine. Certainly, **POL00091037** is attributed to me and clearly shows the prosecution lead as Iain MURPHY, but later in the life of the case I perform the prosecution sign off. Mr. MURPHY was the Fraud Strand leader for a period (I think he was my successor) and the case relates to late 2010. I think Mr. MURPHY held the position throughout 2010. To the best of my knowledge, I had limited operational involvement in investigation cases from then (albeit I seem to have returned to Security Operations in 2011 for a period). In my Grapevine role I supported Fujitsu ARQ requests made by operational Investigators (as one administrative part of my Grapevine role). Later in this statement I talk about supporting an operational investigation when Mr. Stephen BRADSHAW wished to obtain advice when an interviewee was initially undecided whether they required the presence of a solicitor. Without

the benefit of memory or documentation to the contrary, I suspect that this was a period when I was the only immediate available Senior Security Manager and not the substantive Security Operations lead – I will cover off this specific instance later in this statement. To recap I suspect that the Inquiry is labelling a small number of authorised prosecution activities incorrectly to me.

21. I suppose that I could best paraphrase my various roles and responsibilities within my security career with Post Office as follows:

- i) Investigation liaison was a District role acting as the interface between the District and the Post Office Investigation Department. I received no specific training save for a transfer of activity with the predecessor. I was trained in elements such as DPA and the various headings (In Confidence) and storage and transmission protocols required for personal data and confidential papers.
- ii) The Assistant Investigator was a Regional role. This was accompanied by a mentorship with a far more experienced Investigator. I would have started to receive training through this role using mediums from classroom, through to electronic and paper handouts. I would also have met members of the Criminal Law Team. I recall training sessions from both in and out of house Lawyers and training staff from the Post Office Investigation Department.
- iii) The Investigator role was Regionally based. My training detailed above was supplemented by significant levels of supervision and general oversight.

In this role I was performing the role of lead investigator and discharging activity from interviews under caution through to case paper and committal preparation. To the best of my knowledge all my tenure in this capacity was pre-Horizon.

iv) I don't recall me holding National Investigator role (I thought this was a title afforded to a former line manager Mr Tony UTTING). There was a period when I was responsible for leading a small team of investigators, again a Regional role. This role was leading on complex investigations and supporting a team to ensure effective casework delivery. Again, this was mainly pre-Horizon and was interspaced with a period supporting Tony UTTING as a National Investigation Manager for Post Office Ltd; I also supported Mr. UTTING at this time with the draft of policy documents and also was seconded for a 12-month period as a project lead to the creation of Post Office Ltd from Post Office Counters.

22. As a Senior Security Manager, I occupied several varied positions:

i) The Commercial Security Manager saw me support new and existing products and services in terms of ensuring that they were deployed with suitable levels of crime risk assurance. This was a national role and saw me work with clients and Product Managers. This was a senior role in terms of impact and decision making albeit with no operational investigative activities or involvement in Horizon.

ii) The Fraud Strand Manager / Security Operations saw me support investigation cases via Investigators and their respective Team Leaders. I

can't be specific around the numbers in terms of span of control but there were regionally based Investigators covering events across the UK, along with Team Leaders and I seem to recall Financial Investigators. There may have also been a Casework Manager responsible for the timely and effective conduct of investigations. My role here was to provide leadership to the crime landscape and to support the identification of new and emerging crime trends. During this period, I would have discharged the prosecution authority albeit this is an area I will discuss later in this statement.

iii) Training through this period continued; I became the POCA Senior Appropriate Officer and seem to recall undertaking other training courses in a similar vein to those detailed earlier in the statement.

iv) From the role above I seem to recall leaving operational investigation (I have already referenced that my successor was ultimately Iain MURPHY) and leading the crime intelligence and administrative support function under the title Grapevine. Structure would have been broadly similar to the above in terms of leading the function via direct reports and one full-time consultant. There was no Horizon or operational investigations in this role save for providing administration support for the conduit of Horizon and enabling Helen ROSE as a team member to support ad-hoc analytical requests a number of which related to Horizon. I'm unsure the dates to which I ebbed and flowed between Security Operational roles, but I certainly became the substantive Grapevine Senior Security Manager in 2012; this saw me hold responsibility for the intelligence services provided by a third-party supplier in terms of risk and potential risk / crime pattern analysis for Post Office branches utilising the National Intelligence Model and crime risk management risk weightings. As

I've detailed, at this time, I also had direct reports responsible for supporting casework management and for liaising with Fujitsu in terms of receiving and processing ARQ requests. To be honest, my primary focus at this time was supporting the Grapevine product in terms of the external crime landscape.

v) Around 9 months or so before I left in late 2014, I was effectively being removed from my role and asked to design a structure that would again support a reduction in headcount as well as accommodate my departure. I wasn't exactly placed on gardening leave, but my operational career with Post Office was at an end and I was more or less omitted from all other activity.

23. I want to address now how I understood my role in each of the following. For simplicity I will model my answers around those organisational roles I held as Investigation Manager, Investigation Team Manager and Senior Security Manager Fraud and latterly in my Post Office career Grapevine.

24. For disciplinary matters I would have observed the relevant Codes of Conduct appertaining to Post Office Ltd. As a line manager I would have applied these. There were legacy Security team discipline conduct instructions, albeit my recollection is that these were superseded by generic business unit standards of behavior and particularly at separation from Royal Mail Group in 2012. Irrespective of policy, it was recognised that conduct awards would be potentially disclosable in future prosecution cases and that they would have a significant impact on the recipient. I am aware of the award of conduct up to and including termination of employment for members of the Security Team.

25. For interviewing then my role was to comply with the impacting elements of PACE when I was actively conducting investigations.
26. Disclosure I wish to cover in more detail later as I appreciate that it will form a significant part of the Inquiry's ask from me. All Investigators were expected to comply with CPIA.
27. In terms of my role in litigation, then I read this to be recovery under POCA; for non POCA litigation, then my role would have simply to have been to provide supporting case papers and potentially additional statements. I did not make non POCA litigation decisions. In terms of POCA then I discharged the role of Senior Appropriate Officer. This was around providing oversight to the Financial Investigators and acting as signatory to the various authorisations required to perform their role and the recovery objective. The Head of Security, John SCOTT, had overarching responsibilities for the strategy around recovery. I certainly recall conversations with him around the calculations concerning recoverable amounts and defendant's benefit. I recall that Mr. SCOTT was specifically challenged by the NFSP around the calculation of recoverable amount in a particular case. We discussed the case and whilst I don't recall the specific outcome it was clear that he had been challenged at a senior level.
28. In the context of liaising with other departments then communication was predominantly between investigation function and Criminal Law Team. There would be correspondence with the Criminal Law Team on a regular basis. In

addition, stakeholders such as the Retail Line Management would be appropriately apprised of charging decision and key elements of progression. In terms of lessons learned and product weaknesses, then we would drive liaison with product teams and financial departments within Chesterfield Product and Branch Accounting. We would also undertake regular liaison with Information Security in respect particularly about requesting Horizon logs.

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

29. The organisational structure of the Security team changed frequently and I have detailed previously a number of the roles I myself occupied as a result of restructures; broadly speaking and later in my career, there was a Fraud Operations strand that led investigations against employees and SPMRs, a Grapevine strand that led on crime intelligence and administrative support, Physical Strand that led on supporting physical crime mitigation, Asset Security that looked after physical security assets and the Commercial Security strand that offered crime risk assurance to new and revised product and services.

30. Function changes could be significant. I seem to recall organisational charts with 80 or so colleagues, quickly depleted over the years. There were several significant changes that led to sizeable redundancies, strand renaming and functional job titles changing.

31. I have read though the suite of supplied policy documents. For Group policies that would have been cascaded through the Security team, I would have been a recipient as opposed to a contributor / author. On an aside **POL00104968** has a comment that seems to have been attributed to me; this is incorrect, it is a comment seemingly from Dave POSNETT who I believe is an Inquiry witness.

32. I would logically have had input into **POL00105229** covering Post Office authorised access to PNC. As I recall this was a highly regulated area and subject to external audit. Again, logically, I would have oversight into several of the POCA type investigation policies and specifically the policies that were drafted post Group separation such as **POL00104853**.

33. Very early in my Security career I worked with Tony UTTING as National Investigation Manager. I held for a very brief period a policy and standards role. I do not recognise any of my work from this period in the supplied documents. This would certainly have been a pre-Horizon role. Any of my work from that time I suspect would predate materials available to be given to the inquiry.

34. There were several impacting policies during the time that I occupied roles within the Security function. Logically, these would have come across my desk and whilst I don't recall them specifically, they would have been applicable to my team. These would include the Group policies including those at **POL00030578 / POL00104812, POL00031004, POL00031003**.

Other policies authored in 2010 and onwards I'm still unsure around my precise roles within the function.

35. The function also had I seem to recall a suite of policies / procedural standards covering PACE 1984 codes of practice, DPA, RIPA, HRA, CPIA and safe ways of working.

36. Policies would be revised dependent on legislative changes. We would ordinarily be advised of these changes by the Criminal Law team.

37. Post Office split from RMG in April 2012. By this stage I do not believe I was working within the investigation element of the Security team. Whilst I supported John Scott on separation (I specifically recall discussing with the Home Office our status in POCA legislation as well as agreeing a way of working with Royal Mail should a Post Office employee or subpostmaster be suspected of offences against Royal Mail) – actions and objectives are reflected in **POL00104900**, **POL00105191** and **POL00105216**, I do not recall spending significant amounts of my time on the split but I may have attended a number of senior meetings.

38. In terms of understanding the way that investigations were conducted post-split, then I do not believe that I held a senior role in the investigation function at the time. If I did, I'm not confident that it was for a sizeable duration. In addressing how investigation conduct changed at this time, then save for the

fact that we no longer received Group policy documents or Group training support, then the mechanics of investigations remained the same.

39. In terms of complaints around conduct then I would have been expected to follow the company policy around conduct. I certainly don't recall a specific policy that we applied outside of the standards expected by Post Office. I know that pre 2012 split there was a Group policy, but conduct would have followed the business unit protocols.

40. Irrespective of the successive structural changes, then Investigators would report into a Team Leader and would overview their cases on a regular 121 basis. I think at one stage this was completed by both physical case files and associated contents along with electronic case logs. Expectation would be that the Team Leader would overview their direct report's cases on hand and advise around quality and speed of progression. The Team Leader would also intervene if a direct report was failing to progress inquiries in a timely manner. I do recall that there was also a template around the construction of case files to standardise casework.

41. As previously detailed, this was a heavily mentored role, and my expectation was that Team Leaders were highly visible and staying close to direct reports in terms of casework supervision.

42. Crown Office investigations were relatively rare. The reason for this is that, besides the smaller population in terms of physical numbers, Crown Office

employees were subject to regular till checks and cash float and stock exchanges between their peers. It just wasn't possible or at least simple to commit ongoing false account of a cash on hand figure providing, obviously, that supervision was applied as it should be. We did however prosecute employees including those who worked in a Crown Office. There was no difference in approach or expectation of how a case would progress up to and including prosecution. If anything, there was a lower appetite for loss within the Crown environment. There was a time when Crown employees were expected to produce weekly balances with no more than a £2 variance and regular values above that could see investigation involvement.

43. There was also a period when resources would have been applied to suspected thefts from SPMR assistants. By this I mean cash thefts and not simply fraud against customers and / or clients. This ceased when I was new in role and ended with the transition of Districts to Regions that I mention earlier in the statement. On an aside, I do think that was a retrograde step as it left SPMRs isolated and with the unenviable task of attempting to engender police support to counter and evidence suspected employee theft.

### **Audit and investigation**

44. I've read through **POL00104821**. I don't think I have ever seen it before. I do question who it is aimed at – I'd have thought it was aimed towards Auditors – cash and stock checkers in effect. It's not something, end to end, I'd envisage the Investigator completing. In summary, then an Auditor would attend an audit based on two broad scenarios; that is that a routine, unexpected, audit

has produced evidence of wrongdoing either by virtue of a cash loss, other anomaly or admissions made to the Auditor. This would see an Investigator provide reactive audit attendance and would only be performed, on the same day, if the Investigator was available and the journey was practicable. The second reason for attendance would be in response to intelligence around the likely result. Intelligence could be Product & Branch Accounting monitoring cash movements in branch, or a client complaining about how customer transactions were being dealt with.

45. Irrespective as to the catalyst for Investigator attendance, then the purpose for attendance would be broadly similar, in terms of securing and examining evidence and seeking to obtain an account from the person(s) responsible. Whilst frequently, this would see voluntary interviews and searches on the day, exceptional circumstances would see arrangements made to interview later. Invariably, the Investigator would also have engaged with the retail line in terms of future of office immediately post audit.

46. I seem to recall that there was a triggers and timescale document that covered the monetary loss value at which investigators would get involved, coupled with prima facie evidence of wrongdoing. Unfortunately, I've not recognised within the bundle of documents supplied to me. It was certainly at around a £1K (one thousand pounds) before Investigators got involved and even then, at that value, where other conditions existed, such as the value disturbed a clear or obviously falsified balance. In terms of did this change during my career with Post Office, then in the face of reductions in

Investigator numbers, then lower-level cases would not have progressed.

There was no one person that was required to instigate an investigation; there was an accepted case raise process and it certainly wouldn't have needed my involvement as a senior manager.

47. The Contract Manager was not in a position to ultimately unduly influence whether a case was raised or not or as to whether a particular course of action was followed. This had always been the case and I certainly don't recall this changing during my tenure.

48. As previously detailed, there was a trigger document. This would have been reviewed during my tenure, but I'd expect that elements in the document reflected an increased risk appetite, to reflect that resource had diminished. Certainly, I recall undertaking investigations in the late 1990s and early 2000s that would never have been conducted later in my career; one example was the petty thefts of personal property in a Welsh Crown Office that was met with electronic surveillance and early morning testing operations. That type of case would never have been undertaken even in 2007 and certainly not in 2014 when I left.

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

49. Once a reportable audit discrepancy had been made, then the Investigator would be expected to attend the branch and make introductions to the personnel on site. Traditionally, two Investigators would have attended, with a

lead Investigator making introductions and establishing from the Auditor(s) in attendance the details of the variance and details of any pertinent comments made by the SPMR. Once this was established then on the proviso that the audit had been completed, then I would have expected the Investigator to invite the SPMR / person responsible for completing the account to a formal interview under caution.

50. Personally, I would have started to use my pocketbook from entering the branch and would start to record key events and pertinent conversations. I would also have asked the SPMR if they had any objection to the interview taking place on site, dependent on suitability.

51. I would then expect an interview to be prepared; this saw, in my time, a two-tape recording machine utilised, and a set of paperwork completed and read aloud by the Investigator. The paperwork would see the caution administered and paperwork completed around whether legal representation was required. There was also an offer made to have a Post Office friend witness the interview. Obviously, if either of these conditions were required to be met, then arrangements would be made.

52. The events of the day would then be outlined, and confirmation requested around any pertinent conversations or verbal statements made prior to the start of the recording.

53. An account would then be sought from the SPMR. There would be a lead Investigator and second. Towards interview conclusion a second caution would be administered, and the interview closed. The Investigator would then apprise the Contract Manager as to the outcome and traditionally you would relay to the SPMR the requirement to speak to his Contract Manager around the immediate future of the branch. At a suitable point the Investigators would leave the branch, traditionally ensuring that cash and stock was secure.

54. From this stage, the case would enter the casework management system.

#### **Decisions about prosecution and criminal enforcement proceedings**

55. There was a period when I dealt with prosecution decisions, both as a conduit between the Post Office Investigation Department and line managers making the decision and then as a period myself as the nominated representative. I'm unsure why the switch was made between line manager and Security as a nominated representative, but it occurred.

56. A decision to prosecute would only ever be made in the face of supporting advice from the Criminal Law Team (CLT). CLT would have seen all the facts appertaining to the case including audit reports, Investigator report, supporting evidence and interview precis. My expectation was that the CLT as an integral part of Post Office security would have made all the due considerations in line with Code for Crown Prosecutors and applied each necessary test in reaching their decision. I took a stance that the decision will have been checked by

CLT for fairness and objectivity. I saw my role to confirm their decision and place the case into prosecution status via the Investigation Team Leader.

57. I understand that documentation exists stating that the decision to prosecute ultimately sat with the Head of Security (**POL00104929**). I'm genuinely not sure where that originated. I do seem to recall that towards the end of my tenure John SCOTT as Head of Security was personally signing off the authorities. During my tenure I was advised that I was the nominated representative. I guess that the Head of Security reference may have been a post Group separation change.

58. The Contract Manager had no input into the decision-making process.

59. In terms of test around the correctness of prosecution and charging decisions, then I firmly expected this to have been considered at the CLT stage. If they had felt that public interest factors tended against prosecution, then my expectation was that this would have been clearly stated. I'm genuinely not attempting to be evasive, but I failed to see what additional input I was providing around correctness when a Principal or Senior Lawyer had carefully made the charging decision.

60. The question around charges was solely within CLT; whilst towards the end of my tenure I'm aware that investigators would recommend charges when submitting papers into the CLT, the ultimate recommendations sat with CLT. Again, in terms of prosecution decision then my expectation was that all elements had been considered by CLT in reaching a decision.

61. Restraint and confiscation was enacted under POCA 2002 and under the oversight of the National Police Improvement Agency (NPIA). There was a prosecution financial trigger applied to engagement and I seem to recall this was around £5K (five thousand pounds). The initiative was under the oversight of the Head of Security and for a period as Senior Appropriate Officer, I could provide the signatory for various elements of the Act. Confiscation / restraint was very much the default position, and it was widely recognised as being a key driver to recovering loss. I don't recall a specific sign off process to consider proceedings, but obviously the Financial Investigators would keep me apprised and require my input as SAO signatory.

#### **Training Instructions and guidance to investigators within the Security team**

62. Throughout my career in the Security team there were several approaches to training; I may well reference courses that I personally attended that were subsequently made obsolete or superseded by other training interventions. For example, I trained under Lancashire Constabulary in terms of investigative interviewing but am aware that would have only applied to a small number of investigators. Generically, the function saw comprehensive training. This would traditionally have been a residential course held at a management training facility. Whilst I do not recall the exact curriculum, it certainly contained elements around interviewing of witnesses and suspects (I seem to recall role playing was a mainstay) and would also have covered search awareness. Again, my own search course was led by Group trainers at

Metropolitan Police training college using their own search houses. I seem to recall that the residential Post Office training course had a pass / fail weighting with additional support given to weaker attendees.

63. All elements of case file construction would have been covered including evidence gathering and committal preparation. I would have envisaged that this included obtaining evidence from third parties, albeit I do not recall any specific reference to Horizon data. All Investigators would have received instruction in the use of Horizon and so logically I would have expected that available evidence would have been covered then.

64. Formal training would have been supplemented with significant levels of supervision in terms of operational activity and case paper construction and submission. This was a role that traditionally had a longer lead in time given the uniqueness of activity undertaken.

65. During formal training then attendees would have been provided with a range of training materials including impacting policies and a copy of PACE and CPIA codes of practice.

66. I also seem to recall that representatives from the Criminal Law Team would attend the residential training courses for guest slots. I'd be guessing at their agenda slot, but the residential training was afforded, quite rightly, a certain gravitas.

67. I don't recall specifically receiving the 2000 or 2002 Casework Management document at **POL00104747 / POL00104777** although logic says I would have received the documents.

68. I've heard the Inquiry question previously the meaning of source documents and policy that specifically highlight the removal from various reports of content that indicate failures in security or operational procedures. Throughout the various roles I held within the function I never, ever read this as being applicable to Horizon bugs, errors or defects. I'd like to provide a clear example of how I interpreted this; the Post Office conducted all their product offers and services on behalf of third parties. A third party could be a private entity, through to government departments such as DWP and DVLA. Each product and service had a transactional process that the Post Office agent was expected to follow and then some form of back-end reconciliation to assure elements that were important to the particular client. Up to 2005, Post Offices would pay many millions of pounds to benefit claimants using paper-based pension & allowance payment books. This was a wholly flawed proposition in terms of the design of the book and a weak reconciliation process that saw <10% of work submitted subject to check. In essence, this meant that a Crown employee or SPMR or his or her assistant could pay benefit claimants £100K (one hundred thousand pounds) in a particular accounting week and claim that actually £120K (one hundred and twenty thousand pounds) was paid. The resultant cash surplus could be applied then to personal use. The fraud in this respect was audacious and drew the attention of organised crime groups (OCGs), who would target willing or

unwilling SPMRs and Crown colleagues. In terms of the inherent weaknesses in the design of the product, then Investigators were advised that under no circumstances should the product weaknesses be supplied in any form of disclosed discipline report but should sit within the offender reporting process.

69. There were similar weaknesses within a range of products. I seem to recall a sizeable fraud through the poor treatment of Lottery payment cheques. Again, there would have been a concerted effort to keep these failures out of a wider public domain. I actually supported the approach.

70. As no time in my career was I aware of an implicit or explicit request, demand or expectation that this approach was to be applied to Horizon failures.

71. My expectation is that ultimately every single document and Investigator comment on organisational weakness should have been subject to review by CLT and the disclosure test applied accordingly. I remember being specifically advised, by CLT, that this would be the case.

72. I do recall something of the compliance checks. I may be wrong, but I think that every case due to be sent to CLT for their comment around a suspect offender enquiry went through a series of compliance checks. I actually think that this had originally been a minimum of two cases per annum, per Investigator but had changed over the years. Their purpose was to standardise the quality of casework, I don't recall who specifically performed the checks. This changed dependent on team structure and whichever role

held that responsibility. I do recall that earlier structures had a substantive Casework Manager that would have had overarching responsibility for casework quality. The Casework Manager would have seen every case. I seem to recall that this responsibility switched to team leaders for a period post restructure and then back to a single point. I seem to recall that Dave POSNETT conducted a number of the checks, but I may be wrong.

73. In terms of development, then again, I don't recall specifically being involved in their design and deployment but logically I must have been.

74. Again, I never, ever read the requirement to, in any way, sanitise a report required to be disclosed for conduct purposes to have been applicable to Horizon. My take on this as I have previously detailed was that we were absolutely required to treat issues around product and service reconciliation and crime risk exposure with care and this certainly extended to placing within the public domain. We had significant crime risks within a number of product offerings predominantly around DWP type products. The situation was so bad, that when the DWP benefit book contract was reaching obsolescence, we had to recruit and train a team of submission checkers based in Chesterfield. This was to shore up the collapse of weekly submission checking by the DWP.

75. At **POL00118104 & PO00118128** I find the issue around "Identification Codes" as utterly abhorrent. I certainly did not draft the document and have no knowledge who did. I do not recall reviewing the document.

76. We did instruct Investigators to record identification codes. My recollection was that these were required to complete any submission into Police to have details of subsequent convictions entered onto the PNC. These were referred to as NIB type details. I certainly don't recall the horrendous language on the form or the obsolete country names.

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

77. I personally was not an operational Investigator from the inception of Horizon. I don't recall supporting or certainly leading a Horizon type investigation. I did obviously lead the Fraud Strand and Security Operations function during pertinent periods so will respond with that in mind.

78. I appreciate that this is a view that will have been expressed previously, but throughout my tenure the opinion firmly expressed at every turn, internally, was that Horizon was fit for purpose. I recall with an element of clarity updates from John SCOTT assuring the Security function that the system was reliable, and we were to continue with BAU activity. I appreciate that there became a more measured approach towards the end of my tenure, but I certainly don't recall being involved in those conversations. I also seem to recall an internal Paula VENNELLS communication in response to the increasing noise around Horizon; obviously I can't recall word for word, but the thrust was that Post Office were defending the system and refuted the claims. My point is that with honesty the use of tools such as Credence data and ARQ logs were to my mind used as much to evidence guilt than innocence and particularly utilised

when false accounting was admitted but not theft. My understanding is the Investigator would analyse logs to attempt to evidence theft and wrongdoing particularly in terms of cash balance declarations and redeclarations; I'm not even sure how the log would denote a bug, error, or defect. It's certainly not an area we had any training in, i.e., to spot a bug, error, or defect these are the data patterns you should search for. The language at **POL00055590** in terms of Horizon bashing expressed by a Senior Lawyer was not uncommon.

79. My understanding is that Fujitsu was contracted to provide Audit Record Query data, on demand, using an agreed secure process. I seem to recall that the data provided a full log at key stroke levels for the period specified by the Investigator and providing transactional and branch reporting detail. I'm aware that this data could be used to identify singleton transactions (like the use of a certain credit card) or a full and complete series of transactions using a date range specified by the requester.

80. I do recall limits in respect of ARQ requests. **FUJ00080107** has refreshed my memory and I recall that as a function we were capped, within contract, at 720 requests P.A. I seem to recall that this changed during mediation, but I wasn't involved in discussions around this and am not aware what the uplift was. I seem to recall that additional requests were around £500. I don't specifically remember being involved in uplift conversations that authorised these; it certainly wasn't a budget that I held, and I presume that John SCOTT would have addressed this with the wider business.

81. I don't recall specifically any changes between legacy Horizon and Horizon online. I do not recall Investigator noise that this was proving to be problematic.
82. There was a period towards the end of my career when I managed the crime intelligence function under the heading Grapevine. This function acted as the conduit between the operational Investigators and Fujitsu in terms of ARQ requests. This was a stringent process and covered by a policy that unfortunately hasn't been presented to me within supplied documents. I didn't act as the gatekeeper to requests. I do recall that Dave POSNETT would get involved in out of course requests in terms of size. As a Fraud Strand / Investigation lead, then I can say that Investigators were empowered to request ARQ data using a prescribed process. I don't recall ever authorising a request nor by the same token do I recall refusing one.
83. I don't know who specifically received the ARQ requests within Fujitsu – I do recall a Penny THOMAS being potentially involved. I do recall that these requests were complied with by the return of password protected CD-ROMs.
84. In terms of additional prosecution support then I obviously recall that Fujitsu would provide expert witness testimony presented by Gareth JENKINS. I'm unsure what the contractual basis for this was.

85. I don't recall any discussion I was privy to in 2003 / 2004 around limits on Fujitsu requests. I'm not sure what role I undertook in 2003. It wasn't Fujitsu facing.
86. I was not aware that 2003 had seen a decrease in contractually covered requests (a question raised at 28.ii under Horizon data). I suspect this should read increase as we were then preparing to shore DWP benefit book reconciliation and investigation using internal resource.
87. I'm not aware of any impact on investigations in 2003 that the reduction in requests within contract had.
88. 2004 saw an increase in pre-paid requests through to the DWP inhouse activity previously detailed.
89. I do seem to recall some conversation around direct access to data. I'm not aware that this was achieved in my tenure and certainly not for historic data. I think that Credence access provided 90 days.
90. In my employment post the Post Office I have yet to work for an employer who cannot access, on demand, their own EPoS data and usually via their own propriety data warehouse. There would be a question around the granularity of data held, but my experience is that these can be overcome with system changes. I am aware that several retail organisations will exercise independent data harvesting and storage solely for the investigation of

anomalies, leaving an independent warehouse to capture transactional sales and performance details.

91. In line with my response at 78, my belief is that there was a cynicism in terms of the steps that were taken to support any assertion that Horizon was the root cause of discrepancies. Horizon data from my perspective was primarily a tool to either evidence how false accounting took place or to support a charge of theft and particularly when theft was denied at interview. I'm struggling to understand how the ARQs would identify a bug, error, or defect and particularly if their presence was subtle and sat beneath obvious key stroke data.

92. I'm not aware of circumstances where an ARQ was provided to a SPMR, save for prosecution cases when I would have expected the data to be disclosed.

93. I've considered **POL00114566**. At the time I suspect that I was supporting our internal response to the withdrawal of the DWP benefit book as a method of payment for claimants. I know that this is one of the reasons cited why we were seeing an uplift in requests, along with the fact that paper-based records were disappearing from branch and that cases needed to be supported by Fujitsu.

94. In terms of **POL00114566** whilst I can't recall my response at the time, I would have been disappointed by the omission and particularly of end of day activity.

95. I don't recall my thoughts around the prevalence highlighted in **POL00114566** at the time. I would now read it as a system weakness in terms of capacity, exasperated with human error.

96. I don't recall that the information in **POL00114566** impacted on investigations and prosecutions. I see that Tony UTTING was detailed as Head of Security in the period. Mr. UTTING may well be closer to response and steps taken.

97. Whether the fact that requests had been returned incomplete was identified and communicated in other case than that I'm not aware of. Again, I would have expected that CLT and the Head of Security would have assured this.

98. I have no knowledge of what happened to that particular case impacted by **POL00114566**.

99. Other than acting in a role that had team members who acted as the conduit between Post Office Investigators and Fujitsu then I can't recall any regular contact with them. Contact historically was via the Information Security Team.

100. I understood Gareth JENKINS to be the expert witness for Horizon. His role, remit and purported status was presumably decided between Post Office Ltd and CLT. I had no dealings direct or otherwise in this. In matters of independence, then my expectation would be that this test around the validity of his status would have been applied by CLT.

## Relationship with others

101. I had very little contact with Cartwright King Solicitors. I seem to recall having one meeting with them at one of their offices, but don't recall the context or content. I understand that they commenced offering the initial charging advice in cases, but I don't recall how that came about. I'm assuming that this was post Group separation.

102. In the early stages of my career and particularly when I had District facing roles as opposed to National, then I had ad-hoc relationships with NFSP Representatives. We would often see a Representative performing the official friend at interview role and would get to know one another via that contact. We also attended NFSP events and roadshows to provide personal security advice and to show a presence. As my role progressed Regionally and latterly Nationally, then contact became less frequent. I do seem to recall that John SCOTT as Head of Security would meet them on a formal and presumably structured basis.

## Involvement in Criminal Prosecution Studies

### Prosecution of Josephine Hamilton

103. I have no recollection of this case and note from **POL00047955** that Tony UTTING was detailed as prosecution authority. I have read and noted y, **POL00118877** and **POL00118990** with **POL0018990** unfortunately being

unreadable. Again, I cannot be sure what role I played in this investigation. I was not the lead Investigator, nor second officer. Potentially, I would have discussed case progression at 121s with team leaders as I recognise the inclusion of Paul DAWKINS as holding this position, but I really am speculating. I clearly became involved later in the prosecution as evidenced by **POL00049083**.

104. I was aware of the allegations around Horizon IT issues. At the time and as previously detailed, these would have been treated in line with the business advice. I see that at **POL00044388** this sentiment is reiterated by Juliet MCFARLANE as Principal Lawyer.

105. I do not recall specific communications in terms of plea, other than those supplied to me as part of the Inquiry. I would expect that the managing agent / counsel would be involved along with CLT and the Investigator in the case. I see that this case came to me for authority to proceed with the proposal, I'm not sure how often this would take place. Very often a basis for plea would be agreed on the day and without my availability and therefore input. I would be guided on the appropriateness of acceptance by CLT.

106. I'm not aware of any conditions required to accept the plea. I don't recall ever being privy to discussions that a plea came with caveats around Horizon.

107. I'm not aware of the circumstances of why the theft count was left on file. I'd presume that this was to enable reinstatement should it be required at a later date. I'd really have expected CLT to have led on this.
108. I would likely have read **POL00047955**. There must surely be a connection between agreeing to treat the theft charge and the lack of theft evidence. I read the observation by Mr. BRANDER around evidence of cash inflation (lack of) to mean that he did not find a series of inflated cash declarations succeeding lower declared values. I wouldn't have thought this was unique as there were ways to overstate cash values without leaving an audit trail.
109. I have considered **POL00049071** and **POL00049535**. I would have been supervising Ged HARBINSON. I had qualified under the National Police Improvement Agency as the POCA Senior Appropriate Officer. I would have had oversight of the financial investigation using 121 discussions with Mr. HARBINSON as Financial Investigator and his case notes. This was a period when we were heavily supervised by the NPJA.
110. I do not have the benefit of successive POCA file notes that illustrate how the loss was recovered. I presume from **POL00049083** that the amount was repaid prior to sentencing.
111. I have read the relevant paragraphs of **POL00113278**. Clearly, the prosecution was wholly wrong as was the continual Post Office refutes that the system was not at fault. Had I been aware that there was knowledge of bugs, errors and defects that could ultimately and significantly affect the cash

values required to perform an acceptable balance and I was expected to remain mute around these and continue any form of role within the Security function, then I would have considered my position untenable.

#### Prosecution of Susan Rudkin

112. I have read and noted the available documents in relation to the above named. I would have had no role in the initial investigation but would have been privy to the upward report at **POL00050123**. As previously stated, this was a period when I discharged the role of nominated representative in terms of prosecution decision. I have previously outlined my role and would have taken the proposed CLT charges and at **POL00050347** and advise that prosecution should ensue as per the CLT advice. I was not involved in the decision to charge or the offence construction.

113. I first became aware of the case when I would have received the report cascade at **POL00050026**. My role at the time would have been Strand Leader and would have been to work through the Investigation Team Leader to ensure appropriate case progression. I discharged the nominated representative role and would have performed my SAO role in terms of any POCA engagement. Because of the relationship with the NFSP, I would have likely kept John SCOTT apprised as Head of Security.

114. I had no role in the initial investigation.

115. My role in relation to charge and prosecution remains that at 112/  
above.
116. I have considered **POL00050244, POL00050040, POL00061322, POL00046450, POL00056762 and POL00094295**. I would have been supervising Ged HARBINSON. I had qualified under the National Police Improvement Agency as the POCA Senior Appropriate Officer. I would have had oversight of the financial investigation using 121 discussions with Mr. HARBINSON as Financial Investigator and his case notes. This again would have likely been a case conducted with the knowledge of the NPIA.
117. Recovery decisions were made in line with POCA and after consultation with John SCOTT as Head of Security given the gravitas of the investigation in terms of NFSP relationship.
118. I understand from **POL00056762** that the amount outstanding was paid by way of Compensation Order.
119. I have examined **POL00051044, POL00059762, POL00044916 and POL00060421**. I'm not certain if I was aware of the correspondence at the time. Saying that I would have been surprised if I hadn't been. However, I certainly wouldn't have thought the content would have influenced the decisions made.
120. I have read **POL00046524 and POL00050993**. I don't recall whether I was aware of these issues at the time. However, I have dealt with similar

issues and would have expected that the correspondence was sent to CLT for their notice.

121. I do not recall reviewing the prosecution or indictment decisions.

122. Clearly, the prosecution was wholly wrong as was the continual Post Office refutes that the system was not at fault. Had I been aware that there was knowledge of bugs, errors and defects that could ultimately and significantly affect the cash values required to perform an acceptable balance and I was expected to remain mute around these and continue any form of role within the Security function, then I would have considered my position untenable.

#### Prosecution of Julian Wilson

123. I note that at **POL00044692** that I am the nominated representative in terms of prosecution. This likely would have been the first time I was aware of the case. The case would have, traditionally, been sent to me and the been forwarded to CLT.

124. I had absolutely no role in the initial investigation.

125. I had no role in the charging decision and my prosecution role is as previously detailed.

126. Unfortunately, **POL00052183** is omitted from my papers. I am therefore unaware of the context and the role I played in it.

127. I would have read at the time the report at **POL00044692** was submitted and been aware of the assertion that Horizon was cited as being one of the causes for deficiencies as well as the supporting precis at **POL00050140** and **POL00050128** and the comments made by Mr. Rob WILSON. At the time these would have been dismissed given the repeated assurances being presented by the business around the system reliability.

128. I have considered **POL00051920, UKG100012555, POL00044751, POL00044809, POL00051720, POL00051459, POL00044800** and **POL00051936**. I don't recall seeing these documents previously. I do not recall any review of the prosecution decision albeit any proposed change in the indictment would, time permitting, ordinarily come back into the Security function.

129. Clearly, the prosecution was wholly wrong as was the continual Post Office refutes that the system was not at fault. Had I been aware that there was knowledge of bugs, errors and defects that could ultimately and significantly affect the cash values required to perform an acceptable balance and I was expected to remain mute around these and continue any form of role within the Security function, then I would have considered my position untenable.

Prosecution of Peter Holmes

130. I have been asked to comment on the above using the initial report **POL00050832** and interview precis **POL00066743**.
131. In terms of prosecution, I can see I was detailed as the nominated representative. I would have acted in respect of the CLT decision as previously stated. I would have played no active operational role in the initial investigation.
132. I have read the interview precis at **POL00050561**. I can indeed see that Horizon difficulties have been cited. Again, these assertions would have been transacted with the fact that a steady stream of denials were being issued by Post Office.
133. I do not recall any review of the prosecution decision albeit any proposed change in the indictment would, time permitting, ordinarily come back into the Security function. By time permitting, I mean that occasionally a change of plea in Court may have been discussed directly with CLT, by the agent, and agreed.
134. Clearly, the prosecution was wholly wrong as was the continual Post Office refutes that the system was not at fault. Had I been aware that there was knowledge of bugs, errors and defects that could ultimately and significantly affect the cash values required to perform an acceptable balance and I was expected to remain mute around these and continue any form of

role within the Security function, then I would have considered my position untenable.

#### Prosecution of Seema Misra

135. I have read and noted the available documents in relation to the above named. I would have had no role in the initial investigation but would have been privy to the upward report at **POL00044541**. As previously stated, this was a period when I discharged the role of nominated representative in terms of prosecution decision. I have previously outlined my role in this matter and would have taken the proposed CLT charges and ensured that prosecution commenced. Could I immediately add please that during late 2009 / early 2010 I had no Fraud Strand ownership. This sat instead with Iain Murphy. Whilst I would have been in role for the inception of the investigation, matters during 2010 I would assume were handled or occurred with the knowledge of Iain MURPHY Senior Security Manager.

136. I have outlined on a number of occasions my thought process around discharging the role around prosecution. I saw myself enacting a charging decision from CLT. At **POL00049716** I would presumably have been agreeing with the CLT proposed schedule of charge(s).

137. At **POL00049716** I was enquiring from the CLT Lawyer Mr. Jarnail SINGH as to whether there should not be consideration of charges under the

Fraud Act. At that stage I was aware that the relatively new Act was increasingly being used in charging decisions for cases such as this.

138. I have examined **POL00051441** and **POL00051539**. On **POL00051441**, then in the absence of the committal bundle or page stated, then I am unsure why the Investigator would question prosecution continuance. I don't recall the specifics of this case. I can say that dropping the theft charge in relation to acceptance of falsification of accounts was certainly not unheard of. Again, these matters would have been deferred back to CLT and discussed between CLT and nominated agents.

139. I have read through **POL00051773**. When transacted with **POL00044541** I can see that the challenge to Horizon integrity occurred in around June 2009.

140. I have noted the contents of **POL00052202**. I can see that there is some push back on the volume of ARQs requested. The challenge would have been around exhausting contractual limits and incurring additional costs. I don't read the document as an absolute denial to supply, rather and quite rightly a request for further discussion, led by the Investigator to CLT.

141. I have read through a significant volume of documents in respect to the cut and thrust of disclosure requests. I have no knowledge of these requests or the CLT counters. At **POL00053849** then I have no idea what this relates to. I can see no evidence that this was escalated to me, although obviously it may have been at Team Leader 121 or similar.

142. I can offer no comment as to position offered to the Defence by Post Office around disclosure demands. I can clearly see from the various counters that Post Office felt this was unacceptable, but perhaps a fuller answer would be available from the decision makers in this respect. But simply, as an Investigator, Investigation Team Leader or Senior Security Manager then we would have attempted to meet every disclosure request. It was not for us to apply a reasonableness test, but rather would expect that to be performed through CLT.

143. I do not recall how Penny THOMAS and Gareth JENKINS became involved. I seem to recall that Gareth JENKINS was involved in individual cases via CLT. I can't see a logical involvement point within the various documents save for the statements from Gareth JENKINS at **POL00110275**, **POL00001643** and **FUJ00122906**. I would have considered Mr. JENKINS to have been acting as an expert witness.

144. At the time of this investigation, I recall no explanation given to me internally around a bug, error, or defect within the Horizon system.

145. I have no view on the material sought by the Defence. Clearly, at instances such as **POL00053723**, **POL00044557**, **POL00053746**, **POL00054010** and **POL00044553**, requests were being challenged.

146. In respect of **POL00055418** I presume that this was under the watch of Iain MURPHY as previously detailed. Likewise, I would have expected any changes in prosecution or charge amendment to be within his knowledge if applicable.

147. Clearly, the prosecution was wholly wrong as was the continual Post Office refutes that the system was not at fault. Had I been aware that there was knowledge of bugs, errors and defects that could ultimately and significantly affect the cash values required to perform an acceptable balance and I was expected to remain mute around these and continue any form of role within the Security function, then I would have considered my position untenable.

#### Prosecution of Alison Hall

148. I note that the nominated representative for the prosecution for this case was Iain MURPHY as at **POL00091037** but that at **POL00091300** I act as the nominated representative in providing this. I have covered my thought process around this previously.

149. I had no role in the initial investigation. I had no role in any charging decision.

150. I would have read the case papers commencing with the report at **POL00091037** and precis at **POL00021252**. The case seems centered around lottery scratch cards which I seem to recall was a stand-alone entity to the Horizon system in terms of selling cards, but I also see transaction corrections mentioned that are obviously connected with Horizon. I would therefore have been aware of the connection and again relied on the business assertions.

151. I don't recall any involvement or request to review the prosecution decision or involvement in changing the indictment. I don't recall any involvement in agreeing the eventual plea basis.

152. Clearly, the prosecution was wholly wrong as was the continual Post Office refutes that the system was not at fault. Had I been aware that there was knowledge of bugs, errors and defects that could ultimately and significantly affect the cash values required to perform an acceptable balance and I was expected to remain mute around these and continue any form of role within the Security function, then I would have considered my position untenable.

#### Prosecution of Lynette Hutchings

153. I note that it is alleged I was the nominated representative for the prosecution as per **POL00056478**. I have covered my thought process around this discharge of responsibility previously.

154. I had no role in the initial investigation. I had no role in any charging decision.

155. I would have read the case papers commencing with the report at **POL00056478** and precis at **POL00056532, POL00044505, POL00046625**. I

note that Horizon was immediately cited. I would therefore have been aware of the connection and again relied on the business assertions.

156. I don't recall any involvement or request to review the prosecution decision or involvement in changing the indictment. I don't recall any involvement in agreeing the eventual plea basis. Indeed, I suspect that a number of these discussions and decisions took place and were made when I had no responsibility for investigations.

157. Clearly, the prosecution was wholly wrong as was the continual Post Office refutes that the system was not at fault. Had I been aware that there was knowledge of bugs, errors or defects that could ultimately and significantly affect the cash values required to perform an acceptable balance and I was expected to remain mute around these and continue any form of role within the Security function, then I would have considered my position untenable.

#### Prosecution of Grant Allen

158. I note from **POL00089436** that I was the nominated representative for the prosecution. I do not believe I was at that stage working in the fraud function and that this is an error on the template. I would like this clarified please before I can make further comment.

159. I have examined **POL00089560**, **POL00089110** and **POL00089111**. I don't recall the discussions I had with Mr. BRADSHAW. Contextually, I do

recall that Investigators were to really explore when an individual showed uncertainty around the need for a legal representative and particularly when uncertainty was around cost or convenience. Mr. BRADSHAW did exactly what was expected of him. If I'm reading the events correctly, the Mr. ALLEN showed initial uncertainty around whether legal representation was required, but this shifted to one of him taking advice post interview and being content to continue.

160. Clearly, the prosecution was wholly wrong as was the continual Post Office refutes that the system was not at fault. Had I been aware that there was knowledge of bugs, errors and defects that could ultimately and significantly affect the cash values required to perform an acceptable balance and I was expected to remain mute around these and continue any form of role within the Security function, then I would have considered my position untenable.

#### Prosecution of Mr Khayyam Ishaq

161. I note that the nominated representative for the prosecution for this case as detailed at **POL00046224** and at **POL00057078**. I have covered my thought process around this previously.

162. I had no role in the initial investigation. I had no role in any charging decision.

163. I do not recall how Penny THOMAS and Gareth JENKINS became involved. I seem to recall that Gareth JENKINS was involved in individual cases via CLT. I would have considered Mr. JENKINS to have been acting as an expert witness.

164. At the time of this investigation, I recall no explanation given to me internally around a bug, error, or defect within the Horizon system.

165. In respect of **POL00046243** then my expectation would be that the disclosure test would have been attended to via CLT.

166. **POL00059686** has been examined. I have no reason to believe that Mr. BRADSHAW was doing anything other than tow the party line. Mr. BRADSHAW will need to comment himself on whether he would have made such a bold assertion had he been in possession of all the facts.

167. I don't recall any involvement or request to review the prosecution decision or involvement in changing the indictment. I don't recall any involvement in agreeing the eventual plea basis.

168. Clearly, the prosecution was wholly wrong as was the continual Post Office refutes that the system was not at fault. Had I been aware that there was knowledge of bugs, errors and defects that could ultimately and significantly affect the cash values required to perform an acceptable balance and I was expected to remain mute around these and continue any form of

role within the Security function, then I would have considered my position untenable.

Prosecution of Angela Sefton and Anna Nield

169. I note from **POL00044017** that I appeared as the nominated representative for the prosecution for this case. I have covered my thought process around this previously.

170. Logically, my belief is that this case was a matter of a short few weeks before I left Fraud Strand / Security Operations to take up the Grapevine Intelligence role. Decisions made or not made after this time should be addressed to my successor.

171. I had no role in the initial investigation. I had no role in any charging decision.

172. At the time of this investigation, I recall no explanation given to me by the business around a bug, error or defect within the Horizon system.

173. Clearly, the prosecution was wholly wrong as was the continual Post Office refutes that the system was not at fault. Had I been aware that there was knowledge of bugs, errors and defects that could ultimately and significantly affect the cash values required to perform an acceptable balance and I was expected to remain mute around these and continue any form of

role within the Security function, then I would have considered my position untenable.

### **Review of challenges to Horizon Integrity / Post Office Investigations**

174. I am struggling with any clarity to recall the involvement I may have had regarding investigations into the integrity of Horizon. I have been asked to refer to several emails including **POL00120471** and **POL00120479**. Clearly at **POL00120471**, I am being asked to input into case number details concerning pre and post Horizon online migration. It seems that cash checks on migration were producing shortages; I really can't be more specific or recall why the input was required. Likewise, at **POL00120471**, I can see I am cc into a Rod ISMAY email around Horizon integrity. Obviously, I'm aware that Mr. ISMAY was a key contributor to the defence of Horizon integrity, but I can't remember the specifics, other than the continued stance that Horizon was fit for purpose. I do recall Helen ROSE playing a supporting role in terms of analysis. Whilst ostensibly Helen worked in my strand, I am aware that Helen was supporting other Strand leads with Horizon type issues. At that point my remit was firmly around external crime management and maturing the Grapevine service.

175. I genuinely don't recall any sizeable levels of engagement with the other bodies or individuals named.

### **General**

176. It's clear that operationally there was cynical group think around in integrity challenges and this has been highlighted previously in this statement when you consider some of the language used and assertions made around disclosure demands.

177. I did not seek further information when giving consideration to discharging my nominated representative role in terms of prosecution. I was confident that cases submitted to CLT contained prima facie evidence of criminality, contained all the facts and circumstances and accordingly the charging advice returned never shook me enough to question the recommendation.

178. Yes, I did support the refusal of a prosecution. I worked in the Liverpool District and along with the Head of Services declined a prosecution in relation to a SPMR who had suffered several physical assaults by the local community and whose partner and small child had narrowly escaped serious injury when the rear yard entrance to the Post Office was effectively boobytrapped with concrete blocks designed to fall from a height on anyone accessing the yard. As I recall the SPMR was effectively forced to rehouse his family and committed offences in terms of applying official cash to personal use given increased expenditure, when faced with additional costs this rehousing had incurred. The District argued that prosecution was not the correct route to take. I do recall having a ticking off from a Senior Lawyer for failing to ensure that the District effectively engaged back with CLT when making the decision.

179. I have also been highly critical and challenging when as an Investigator I was forced to deal with branches that clearly lacked financial viability. I recall a Shropshire branch had, I seem to remember, three quickly successive SPMRs that failed to make a viable business with the third incumbent prosecuted. I went past the former branch the other month – it was now permanently closed. I recall vocally criticising a Retail Line decision at the time to continue services. I did similar at other branches and particularly when suspensions were met with family transfers that effectively exasperated financial troubles.

180. The more I see and hear from the Inquiry, then the further I despair. It strikes me that no one, at a suitable level of seniority, had the conviction and gumption to say enough is enough and to drive a timely, truly independent review whilst ceasing all prosecution activity and having the courage to be prepared to support the application and lessons of a truly independent Horizon review, to both historic prosecutions and non-prosecuted repayment of accounting shortfalls. As someone that held several investigatory roles in the Post Office, I feel utterly deceived.

181. With hindsight there should have been a team of skilled analysts working on behalf of branch errors, conducting full error analysis using complete and unabridged Fujitsu data including all reversals. This level of transparency would have supported SPMRs to come forward at low level loss stage, rather than being pushed into systematic false accounting series.

182. I genuinely don't feel well informed enough to comment on Fujitsu's role in escalating bugs, errors, and defects.

**Statement of Truth**

I believe the content of this statement to be true.

Signed:

**GRO**

Dated: .....24th October 2023.....

Index to First Witness Statement of David John Pardoe

<u>No</u>	<u>URN</u>	<u>Document Description</u>	<u>Control Number</u>
<u>1</u>	<u>POL00091037</u>	<u>Post Office Ltd Investigation - Alison Loraine Hall</u>	<u>POL-0090681</u>
<u>2</u>	<u>POL00104968</u>	<u>POL - Enforcement and Prosecution Policy (with comments)</u>	<u>POL-0080600</u>
<u>3</u>	<u>POL00105229</u>	<u>Post Office Ltd PNC Security Operating Procedures</u>	<u>POL-0080854</u>
<u>4</u>	<u>POL00104853</u>	<u>Post Office's Financial Investigation Policy</u>	<u>POL-0080485</u>
<u>5</u>	<u>POL00030578</u>	<u>S02 Royal Mail Group Criminal Investigation and Prosecution Policy December 2007</u>	<u>POL-0027060</u>
<u>6</u>	<u>POL00104812</u>	<u>"Royal Mail Group Ltd Criminal Investigation and Prosecution Policy"</u>	<u>POL-0080444</u>
<u>7</u>	<u>POL00031004</u>	<u>RMG Policy - Crime and Investigation (S2) - version 3.0</u>	<u>POL-0027486</u>
<u>8</u>	<u>POL00031003</u>	<u>Royal Mail Group Crime and Investigation Policy v1.1 October 2009</u>	<u>POL-0027485</u>
<u>9</u>	<u>POL00104900</u>	<u>Undated 'Separation Project - Criminal Investigations Policy for Post Office Ltd'</u>	<u>POL-0080532</u>
<u>10</u>	<u>POL00105191</u>	<u>Activity Plan for POL separation project - Criminal Investigations Policy</u>	<u>POL-0080816</u>
<u>11</u>	<u>POL00105216</u>	<u>Post Office Ltd Security Operations Team – Compliance – Guide to the Preparation and Layout of Investigation Red Label Case Files: Offender reports and Discipline Reports - undated</u>	<u>POL-0080841</u>
<u>12</u>	<u>POL00104821</u>	<u>Condensed Guide for Audit Attendance v2</u>	<u>POL-0080453</u>
<u>13</u>	<u>POL00104929</u>	<u>"Post Office Limited: Internal Protocol for Criminal Investigation and Enforcement (with flowchart)"</u>	<u>POL-0080561</u>
<u>14</u>	<u>POL00104747</u>	<u>Investigation Policy: Casework Management (England &amp; Wales) v1.0</u>	<u>POL-0080387</u>
<u>15</u>	<u>POL00104777</u>	<u>Investigation Policy: Casework Management (England &amp; Wales) v4.0</u>	<u>POL-0080417</u>
<u>16</u>	<u>POL00118104</u>	<u>Appendix 6 - Identification codes (undated - date taken from parent email)</u>	<u>VIS00012693</u>
<u>17</u>	<u>POL00118128</u>	<u>Race Identification Codes, numbers 1-7.</u>	<u>VIS00012717</u>

<u>18</u>	<u>POL00055590</u>	<u>Email from Marilyn Benjamin on behalf of Jarnail A Singh to Mandy Talbot, Hugh Flemington, Jacqueline Whitham, Re: Regina v Seema Misra-Guildford Crown Court-Trial-Attack on Horizon</u>	<u>POL-0052069</u>
<u>19</u>	<u>FUJ00080107</u>	<u>Fujitsu's Guidance on Security management service: Service Description (v.2)</u>	<u>POINQ0086278</u> <u>F</u>
<u>20</u>	<u>POL00114566</u>	<u>Audit Record Requests (Increase In Limits)</u>	<u>POL-0113672</u>
<u>21</u>	<u>POL00047955</u>	<u>Josephine Hamilton Offences Report</u>	<u>POL-0044434</u>
<u>22</u>	<u>POL00118877</u>	<u>Antecedents of Josephine Hamilton - Officer in Case Graham Brander, Supervising Officer Dave Posnett</u>	<u>POL-0118796</u>
<u>23</u>	<u>POL00118990</u>	<u>Josephine Hamilton criminal case study - Suspect offender reporting form to be emailed to Casework team, case file no. POLTD 0506/068, Josephine Hamilton</u>	<u>POL-0118909</u>
<u>24</u>	<u>POL00049083</u>	<u>Email from Graham Brander to Jennifer Andrews, Juliet McFarlane, Dave Pardoe and others re: Fw: Hamilton</u>	<u>POL-0045562</u>
<u>25</u>	<u>POL00044388</u>	<u>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</u>	<u>POL-0040867</u>
<u>26</u>	<u>POL00049071</u>	<u>Josephine Hamilton Case Study: Financial Investigation Policy Log - Josephine Hamilton. POLTD/0506/0685.</u>	<u>POL-0045550</u>
<u>27</u>	<u>POL00049535</u>	<u>Josephine Hamilton case study: [Internal Memo from Ged Harbinson to Dave Pardoe re: Investigation Ref: - POLTD/506/0685 - OFFICE South Warnborough / SUSPECT NAME Josephine Hamilton]</u>	<u>POL-0046014</u>
<u>28</u>	<u>POL00113278</u>	<u>Approved Judgment between Josephine Hamilton &amp; Others and Post Office Limited</u>	<u>POL-0110657</u>

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<u>30</u>	<u>POL00050347</u>	<u>Email from David Pardoe to Fraud Team Post Office, RE: DAM Authority-Susan Jane Rudkin Ibstock</u>	<u>POL-0046826</u>
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<u>33</u>	<u>POL00050040</u>	<u>Susan Rudkin case study: [Witness statement of Gerald Harbinson in support of an application for a restraint order]</u>	<u>POL-0046519</u>
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<u>36</u>	<u>POL00056762</u>	<u>Financial Investigation Events Log, Susan Rudkin csae no: POLTD/0809/0101</u>	<u>POL-0053241</u>
<u>37</u>	<u>POL00094295</u>	<u>Susan Rudkin Case Study - Email from Tahira Rasool to Ged Harbinson re: Michael and Susan Rudkin (Ibstock PO, 2232170) - Email chain provides background to the prosecution and discusses repayment of debt</u>	<u>POL-0093241</u>
<u>38</u>	<u>POL00051044</u>	<u>Email from Jarnail A Singh to Tahira Rasool in re to Michael and Susan Rudkin (Ibstock) Leicester post office.</u>	<u>POL-0047523</u>
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<u>49</u>	<u>UKGI00012555</u>	<u>Letter pertaining to Plea and Case Management hearing R v Julian Wilson from Jarnail Singh to Jolyon Canlin</u>	<u>UKGI023351-001</u>
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<u>52</u>	<u>POL00051720</u>	<u>Letter from Jarnail Singh to Fraud Team Post Office Limited c.c. Gary Thomas and others re: REGINA v JULIAN WILSON</u>	<u>POL-0048199</u>
<u>53</u>	<u>POL00051459</u>	<u>Instructions to Counsel (Mr Anthony Vines of Civitas Law) drafted by Rob G Wilson to settle indictment and advise on evidence and brief for the prosecution in the matter of The Queen v Julian Wilson (Backsheet endorsed by Counsel (Richard Cole) with various dates)</u>	<u>POL-0047938</u>
<u>54</u>	<u>POL00044800</u>	<u>Indictment, Statements of Offences - R v Julian Wilson</u>	<u>POL-0041279</u>
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<u>66</u>	<u>POL00110275</u>	<u>Witness Statement of Gareth Idris Jenkins Version 3.0 11/02</u>	<u>POL-0108082</u>
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<u>69</u>	<u>POL00053723</u>	<u>Email from Jarnail Singh to Warwick Tatford incl em chain from Mark Dinsdale to Rob Wilson re: advice requested on disclosure request in MISRA case</u>	<u>POL-0050202</u>
<u>70</u>	<u>POL00044557</u>	<u>Advice on requests for disclosure in Seema Misra case</u>	<u>POL-0041036</u>

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