

**From:** Andy Holt[IMCEAEX-  
\_O=MMS\_OU=EXCHANGE+20ADMINISTRATIVE+20GROUP+20+28FYDIBOHF23SPDLT+29  
\_CN=RECIPIENTS\_CN=ANDY+2EHOLT1F932521-2F1A-4377-9268-  
FD0FCF5C7371@C72A47.ingest.local]  
**Sent:** Thur 10/07/2014 8:20:39 AM (UTC)  
**To:** Jarnail Singh[ ]; 'Parsons,  
Andrew'[ ]  
**Cc:** Pheasant, Andrew[ ]; Matthews,  
Gavin[ ]; Martin Smith[ ];  
Rodric Williams[ ]; Chris  
Aujard[ ]; Belinda Crowe[ ];  
Jessica Madron[ ]  
**Subject:** RE: Expert [BD-4A.FID20472253]

All

- As discussed before there is overlap with the Deloitte work. Rod can we share the Deloitte report with Imperial College. I would also suggest we have a meeting with Julie and you to look at overlap with the requests from Imperial College.
- I want to make sure we are really clear on scope, having read the document I think this is growing again. In previous meetings we had agreement that the following scope would help us progress. i.e. our aim was to get assurance that the transaction data we used in prosecutions was a true reflection of what had happened in branch. I suggest we review the requirement again with consideration of the Deloitte work and therefore decide what we really need it to achieve. Martin, I will pick this up with you and Jarnail.
- I have concerns about ICL's estimate, although it looks very reasonable I am not sure they have understood the scale of this.

Regards  
Andy

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**From:** Jarnail Singh  
**Sent:** 09 July 2014 11:40  
**To:** 'Parsons, Andrew'  
**Cc:** Pheasant, Andrew; Matthews, Gavin; Martin Smith; Andy Holt; Rodric Williams; Chris Aujard; Belinda Crowe; Jessica Madron  
**Subject:** RE: Expert [BD-4A.FID20472253]

Andy

I agree with Martin. POL cannot be seen to be Cheery picking the information provided to the experts or withholding the information. Experts are independent and POL (or Fujitsu for that matter) cannot be seen to be trying to influence the experts.

Regards  
Jarnail

Jarnail Singh | Criminal Lawyer



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**From:** Martin Smith [GRO]  
**Sent:** 09 July 2014 10:34  
**To:** 'Parsons, Andrew'; Jarnail Singh; Andy Holt; [GRO] Jessica Madron; Rodric Williams; Belinda Crowe  
**Cc:** Pheasant, Andrew; Matthews, Gavin  
**Subject:** RE: Expert [BD-4A.FID20472253]

Andy,

I would not advise that the experts be instructed to look at the old Horizon system. If the experts were to consider the old system, depending on their findings, disclosure issues could arise in historic cases. In any event cases now being investigated and considered for prosecution will involve Horizon on Line, which was rolled out during 2010.

In criminal law instructions and material provided to an expert must be listed in his/her report. The defence are entitled to know what material the expert has considered in order to reach his/her conclusion.

CK would not wish to vet information prior to sending it to ICL; it would be counter-productive to withhold information. The experts may well refer to such attempts and missing information in the report. This would devalue the report and make it easier for defendants to challenge.

I will explore with ICL the "fitness for purpose" heading. If there are any other points, please let me know and I will raise them at the same time.

Kind regards,

Martin.

Martin Smith

**GRO**

Direct: **GRO**

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**From:** Parsons, Andrew [mailto:[GRO]]  
**Sent:** 09 July 2014 07:25  
**To:** Jarnail Singh; Andy Holt; [GRO] Jessica Madron; Rodric Williams; Belinda Crowe  
**Cc:** Martin Smith; Pheasant, Andrew; Matthews, Gavin  
**Subject:** RE: Expert [BD-4A.FID20472253]

All

My thoughts...

A key question appears to be whether ICL look at old Horizon as well as Horizon Online. My guess is that POL won't be now looking to prosecute any old Horizon cases so we can focus on HOL. Martin / Jarnail?

As to access to the SS material, I can't see in principle any issue with this. Material going to SS has been largely vetted already. However, Martin / Jarnail – could you confirm whether an expert under criminal law has to disclose all material instructions / source material in their report? In the civil process, the general rule is that the expert must disclose to the Court and the other side pretty much everything they have considered in forming their opinion. If this applies equally to criminal procedure, then CK / POL may wish to vet any material before sending it to ICL.

We may want to explore what ICL intend to investigate under the "fitness for purpose" heading. This could be as simple as "does Horizon provide the necessary functionality?". Or, it could go wider into "Does Horizon provide a good user experience?". From handling IT disputes in the past, I know that determining the quality of user experience can be a very subjective question, that is difficult to answer.

Finally, I think the structure proposed by ICL really highlights the deficiencies in SS' approach.

Kind regards  
Andy

**Andrew Parsons**

Senior Associate

for and on behalf of Bond Dickinson LLP

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**GRO**

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**From:** Jarnail Singh [mailto:[jarnail.singh@bond-dickinson.com](mailto:jarnail.singh@bond-dickinson.com)] **GRO**

**Sent:** 08 July 2014 16:19

**To:** Andy Holt; Chris Aujard; Jessica Madron; Rodric Williams; Parsons, Andrew; Belinda Crowe

**Cc:** Martin Smith

**Subject:** RE: Expert

Andy

Thanks.

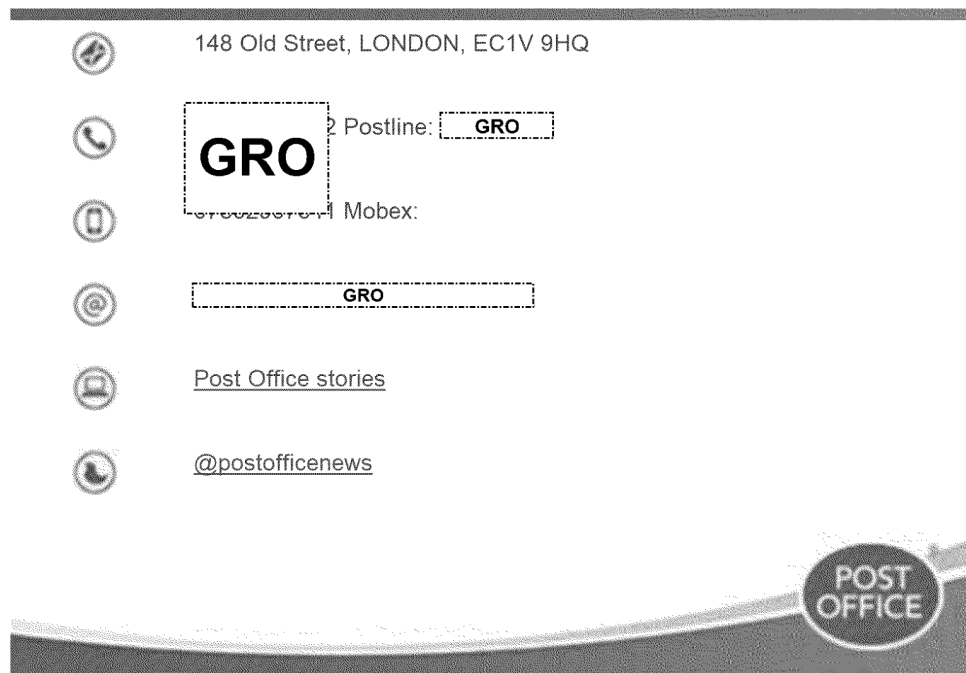
It is perhaps inevitable Imperial college London's experts would wish to speak to Fujitsu directly . Please let me have the name and contact of the person who will be designated by Fujitsu to speak to the experts.

I am keen to avoid further delay. The proposed report represents good value for money and would be extremely useful for POL purposes. Sooner we can demonstrate the system works the better.

Regards

Jarnail

Jarnail Singh | Criminal Lawyer



**From:** Andy Holt  
**Sent:** 08 July 2014 12:46  
**To:** Jarnail Singh; [GRO] Jessica Madron; Rodric Williams; Parsons, Andrew; Belinda Crowe  
**Cc:** Martin Smith  
**Subject:** RE: Expert

Belinda/Andy, some of the requests relate to the Second Sights study (which would include MP cases, spot reviews etc). Are we ok to share this information?

Jarnail, I will share this document with both Fujitsu and within IT so that we assess what ICL are requesting.

Regards

Andy

**From:** Jarnail Singh  
**Sent:** 04 July 2014 13:38  
**To:** Chris Aujard; Jessica Madron; Rodric Williams; Andy Holt; Parsons, Andrew  
**Cc:** Martin Smith  
**Subject:** FW: Expert

Dear All

Please find attached the initial review prepared by professor Kramer and Dr Dulay of London imperial college consultants.

The initial review contains a proposal which is through and outlines the steps the steps to be taken and documentation to be considered. There is a proposed work plan on page 4. As you will see it is estimated that it will take 50 hours consultant days by Professor Kramer and Dr Dulay to complete the work.

Before we proceed with the next step, may I ascertain whether there is any views or observations or questions on the attached documents.

regards

Jarnail Singh | Criminal Lawyer



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