

# Frisby & Co

solicitors

Telephone:  
E mail:

**GRO**

Our ref: AB/TC/LJB  
Your ref: CRM/239850  
Date: 23 April 2004

By Fax & Post **GRO**

For the attention of : Debbie Helszajn

Royal Mail  
Legal Services

**GRO**

Dear Sirs

**RE: R v CARL PAGE  
STAFFORD CROWN COURT**

We refer to the above matter, and indeed your letters dated the 12<sup>th</sup> and 29<sup>th</sup> March 2004.

Having perused the contents of these documents, you will not be surprised that we do require sight of a number of the items listed.

Turning to the schedule of non sensitive unused material, may we please have copies of all of the items on the said list, save for the notice of bail relating to **GRO**, and the similar document in relation to **GRO**. Both of these superfluous items appear on page 1.

*ASKED  
Police  
19.05.04  
Most will  
Have.* Regarding the police schedule, (MG6C) may we also have copies of items 1-13, and item 17, but excluding items 14-16. May we also have copies of items 1-6 on the further schedule, which we assume comprises of all the documents in the possession of the FIU.

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Andrew Broome is a Supervisor for serious fraud appointed by the Legal Services Commission,  
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This firm is regulated by the Law Society  
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ROYAL MAIL  
Re: Carl Page  
23.04.04

Given that there has been police involvement in this matter, as well as that from HM Customs, we presume you have canvassed with them the possibility that they may have further relevant third party materials in their possession, which may be required to be disclosed? Certainly, from the involvement that those agencies appear to have had from the papers we have already seen, there does appear to be very little disclosed, especially from HM Customs. Please confirm the position, at your earliest convenience.

We would also be grateful for the disciplinary notes of the interview held on the 3<sup>rd</sup> July 2002. Arising from this meeting, we would be grateful for copies of the following documents, to the extent that they are not contained in any of the material to be sent to us arising from our request in paragraph 3 above:-

- ✓ 1 A copy of the letter dated the 28<sup>th</sup> of June requesting Mr Page to attend interview.
- ✓ 2 Copies of all warning letters purportedly sent to Carl Page.
- 3 ✓ Copies of all notes, documents and other memoranda, relating to any Audits on the Post Office during Mr Page's tenancy. This must include, of course, any electronic record that was used to undertake the audit, as we may wish to have such matters forensically examined by our own Expert. We presume this will include the ONCH declarations if they were used as part of the audit process.
- X 4 *Not Available* Copy league table indicating STAM performance as handed to Carl Page.
- X 5 *Not Available* Copies of any documents, letters, notes or other memoranda regarding the offer by Mr Coney to have Mr Page shadow a "good branch manager". This should also include any other documentation, which relates to any other issue as a consequence of the disciplinary meeting, and not disclosed elsewhere in any schedule. This should include any notes of advice or visits also referred to by Mr Coney in paragraph 3 of page 4 of the note.

*Need to  
check  
if find  
Electronic  
copies.*

Turning generally to the case, there are a number of further matters which we note are not listed, and which we will require sight of in order to assist our client in his Defence. These items are as follows:-

- \* 1 Mr Hugh Stacey refers in his evidence to an agreement with the Federation of Sub Postmasters to pay £1.12 per transaction. May we please have a copy of this agreement?
- ✓ 2 Mr Stacey also refers to a contractual relationship with regard to corporate customers. Perhaps, we could be supplied with a standard form contract, as is utilised by the Post Office with corporate customers.



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Section 3 (pg 12-13)

3 ✓ Mr Stacey refers to the fact that the Post Office buys currency from FRTS on a daily basis at a wholesale buy rate. This is apparently contractually agreed. We would like a copy of this agreement.

Section 9 (pg 22-23)

4 ✓ Mr Stacey also refers to an agreement regarding revaluation. This relates to feature that money is generated at outlets and not centrally. May we again have a copy of this agreement.

5 ✓ He also refers to a central database, which lists corporate clients. Apparently, this did not include [GRO] or his Company. We would request a copy of this. Also, on this point, we would request sight of any document supporting the contention that Rugeley does not conduct corporate business.

6 Mr Stacey indicates that he was asked to produce a report showing total losses at Rugeley and at all other outlets. Again, may we see this report.

7 ✓ Mr Raj Kalsi refers to booklets concerning cash and cheque acceptance, cash handling and money laundering. Please supply copies.

8 He also mentions the fact that there is no instruction issued to say that business cheques can be accepted for the Bureau de Change. May we have details of the document in which this written instruction is given. Indeed, whilst on this point of instruction, may we also have details of the training records relating to Mr Carl Page, to include details of the syllabuses for the training provided. (Now so far as we are aware).

9 Mr Hutchins refers to outlets that require high quantities of currency, and he includes Rugeley within this list. May we be provided with a copy of the list.  
(Not aware any such list exists, the fact that other outlets like their amount of currency we do not find it is relevant to this case.)

10 Mr Hutchins also, in an attempt to explain his exhibit LGH/04, indicates that the entire order may include other currencies. Please provide copies of the documents used to produce this exhibit. No copies exist.

✓ 11 For the purposes of our Experts, may we please have copies of the daily retail sell rates that were provided by fax for the period in question.

✓ 12 You will be aware that we have previously mentioned the lack of documentation from Customs. This includes issues such as notebooks etc. Please can you address this issue.

(The reference to 13th. [GRO] or [GRO] as above) NOT TO DO WITH PAGE.



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- ✓ 13 Given the large amount of numerical evidence in this case, we shall be instructing an Expert to assist in this respect. Therefore, in relation to all of the schedules produced, may we please have copies of all documentation notes, and other memoranda used in the production of same.
- ✓ 14 In a statement by Deborah Edwards, she indicates that other foreign currency amounts needed to be transferred into the Forde Moneychanger to get a final balance. May we have copy documentation to indicate where the other currency originated.
- ✓ 15 Ms Edwards also refers to total stock and MOP. Again, may we have copies of the documents used by her in the production of this statement?
- ✓ 16 Margaret Pearce indicates that some customers would have negotiated special rates with Carl Page. To the extent that there are such customers, may we have documentation in support.
- ✓ 17 Ms Batty refers to the fact of having "now received training." Please provide copies of the training records, together with a copy of the syllabus for such training and other members of staff.
- ✓ 18 In a statement by Elaine Lieverlay she refers to a conversation with Mr Page which took place more than one year prior too her statement. Please may we have a copy of any note used in the preparation of this statement? *(No such note made)*
- N= LOST* 19 Douglas Brown indicates that he investigated Post Office branches with excess cash holdings, of which Rugeley was high on the list. Please provide a copy of this list.
- ✓ 20 He also indicates that he requested a fax of actual cash holdings. This was apparently destroyed. Are you able to confirm how and when this document was destroyed. Further, he suggests that he contacted Carl Page and was concerned about his casual attitude and previous history. To the extent that this alleged "previous history" is documented, please provide copies.
- ✓ 21 Gwen Talbot refers to the fact that she was unable to obtain daily rates that the coop provided, other than those from the computer system archive records, Please may we have a copy of the archive records to which she refers.
- 22 Mr Patel says in his evidence that he was contacted by Customs and Excise who were concerned about Rugeley Post Office. Please may we have sight of any documentation, which led to this concern, as again the documentation disclosed in relation to Customs involvement is limited, thus far. To this end, Mr Patel said that he was contacted by Customs in January 2003 regarding a cheque to the value £112, 465.96 drawn on an account of RPX Recycled Plastics Limited dated 11.11.02, payable to the Post Office Limited and accepted at Rugeley post office. The disclosure supplied must please include details as to this cheque.



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- ✓ 23 Did Mr Patel have a notebook? If so, please may we have a copy.
- ? 24 We note that it is asserted that there was a "buy back" by Mr Page. Please provide any documentation in support of this contention.

Finally, we have repeatedly mentioned to your Solicitor, Mr Dove, that we are most unhappy about the continued advancement of the Civil Proceedings. By any consideration of the matter, it is wholly inappropriate for these proceedings to continue until such times as the Criminal Proceedings are concluded. Please confirm that you will be applying for a stay of these proceedings until this action has been finalised.

Yours faithfully

**GRO**

Andrew Broome  
FRISBY & CO SOLICITORS

