

List of Exhibits



THE QUEEN - V - Josephine Hamilton

| COURT EXHIBIT NUMBER | IDENTIFICATION MARK * | PAGE NUMBERS | SHORT DESCRIPTION OF EXHIBITS | RETAINED BY |
|----------------------|-----------------------|--------------|--|---|
| 1 | NA/01 | 1-2 | Training Requirements For Incoming Subpostmasters form | All exhibits retained by Graham Brander Post Office Ltd, 14 High St, Eastleigh, Hants, SO50 5TA |
| 2 | NA/02 | 3-8 | Photocopy of section 12 of the Sub postmaster's contract | |
| 3 | PT/01 | 9-10 | Fujitsu ARQ 046/0607 | Not copied |
| 4 | PT/02 | Not Copied | Fujitsu CD ROM (ARQ 046/0607) | |
| 5 | RP/01 | 11 | Outlet Log Entries | |
| 6 | AS/01 | 12 | Schedule detailing audit discrepancies | |
| 7 | AS/02 | 13 | Cash On Hand Summary | |
| 8 | GDB/1 | 14 | Cash On Hand Schedule | |
| 9 | GDB/2 | 15-16 | Photocopy of Hamilton prepared statement | |
| 10 | GDB/3 | 17-18 | CS001 Legal Rights form | Not copied |
| 11 | GDB/4 | Not Copied | Master Tape 042769 | |
| 12 | GDB/5 | Not Copied | Master Tape 042770 | Not copied |
| 13 | GDB/6 | 19-25 | Typed summary of working tape reference 042769 | |
| 14 | GDB/7 | 26-28 | Typed summary of working tape reference 042770 | |

* e.g. AB/1 etc.

NA/01

TRAINING REQUIREMENTS FOR INCOMING SUBPOSTMASTERS
Please complete fully and e-mail to Training Delivery Team. cc to Agency Recruitment.

| | | | |
|--------------|-------------------|--------------|--------------------------|
| Office Name | South Warnborough | FAD Code | 92904 |
| Full Address | Alton Road | Half Day | <input type="checkbox"/> |
| | South Warnborough | Close At | <input type="checkbox"/> |
| | Hook | Remuneration | <input type="checkbox"/> |
| Postcode | RG29 1RS | Tel no. | GRO |

Details of incoming subpostmaster (SPMR)

| | | | |
|--------------|------------------------|----------------|--------------------------|
| Full Name | Mrs Josephine Hamilton | Tel no. (home) | GRO |
| | | Mobile | <input type="checkbox"/> |
| Full Address | GRO | Postcode | GRO |

To enable us to provide the correct level of training, please answer the following questions.

- OFFICE TYPE
 Restricted hours SPSO MSPO
 Combi format Community
- Does the Office require training? YES NO
- Are they willing to undertake classroom training? YES NO
- Please indicate which NON STANDARD transactions are conducted at the office? Those with transactions indicated by * will be offered 10 days classroom training by TDT.

| | | | |
|---------------------------------------|--------------------------|-----------------------------|--------------------------|
| * MOTOR VEHICLE LICENCES | <input type="checkbox"/> | ON LINE LOTTERY | <input type="checkbox"/> |
| * PARCELFORCE GUARANTEED PARCELS | <input type="checkbox"/> | GVT (scratchcard terminals) | <input type="checkbox"/> |
| * UK PASSPORTS CHECKING SERVICE | <input type="checkbox"/> | ON DEMAND BUREAU DE CHANGE | <input type="checkbox"/> |
| * DVLA PREMIUM SERVICE | <input type="checkbox"/> | MONEYGRAM | <input type="checkbox"/> |
| ON DEMAND TRAVEL INSURANCE | <input type="checkbox"/> | FRANKING MACHINES | <input type="checkbox"/> |
| OTHER LOCAL SCHEMES - please specify: | | | |

- Is the office relocating and or reopening? YES NO

IF YES – please ask the Network Implementation and Equipment Team to contact the Training Delivery Team to discuss a preferred transfer date. 0161.886.6121 or via email:- Training Delivery Team@postoffice.co.uk

- Has SPMR had any previous Post Office™ experience? YES NO

| | |
|------------------------|-------------------|
| If yes, please specify | Length of service |
|------------------------|-------------------|

- How many assistants does the SPMR have?

| |
|--------|
| Number |
|--------|

Email to Training Delivery Team and cc. SG_TS_Agent_Recruitment_Support on lotus notes

Enquires GRO

4 Aug 2003

EXHIBIT NO 1

1

TRAINING REQUIREMENTS FOR INCOMING SUBPOSTMASTERS

7. Have any of the assistants had previous experience? YES NO

| | | | | |
|--|--|-----------------------------------|--|--|
| If yes, please specify, if no, how will they be trained/supported? | | Length of service and how recent? | | |
| | | | | |
| | | | | |

9. OPENING HOURS

| EXISTING HOURS | | | | |
|----------------|-------|-------|------|----|
| | From | To | From | To |
| MONDAY | 09:00 | 13:00 | | |
| TUESDAY | 09:00 | 13:00 | | |
| WEDNESDAY | 09:00 | 13:00 | | |
| THURSDAY | 09:00 | 13:00 | | |
| FRIDAY | 09:00 | 13:00 | | |
| SATURDAY | 09:00 | 12:30 | | |

NEW HOURS TO BE INTRODUCED, as from... No change
(Excluding the training period, if possible.)

| | From | To | From | To |
|-----------|-------|-------|------|----|
| MONDAY | 09:00 | 13:00 | | |
| TUESDAY | 09:00 | 13:00 | | |
| WEDNESDAY | 09:00 | 13:00 | | |
| THURSDAY | 09:00 | 13:00 | | |
| FRIDAY | 09:00 | 13:00 | | |
| SATURDAY | 09:00 | 12:30 | | |

10. Are there any other comments or recommendations you wish to make, that may be of benefit to the training/ trainer? Eg whether the office has smoke & dye packs etc

11. Where should the Performance standards, training action plan, and Sales proforma be sent?

| | | | |
|--------------------------|---------------------------------|---|------------|
| Name | Nigel Allen | | |
| Address | GRO | | |
| Your name (Please print) | Nigel Allen | Signature (Unless sent by e-mail) | GRO |
| Date of interview | 17 th September 2003 | Date emailed to Training Delivery Team & Agency Recruitment | 18/09/03 |

Email to Training Delivery Team and cc. SG_TS_Agent_Recruitment_Support on lotus notes

Enquires

GRO

4 Aug 2003

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POST OFFICE COUNTERS LTD

SECTION 12

NA/02

RESPONSIBILITY FOR POST OFFICE STOCK AND CASH

CREDIT STOCK OF STAMPS ETC.

1. The Subpostmaster on taking up his appointment is supplied with suitable Post Office stock, the amount of which is fixed by the Regional General Manager.

CASH BALANCE

2. The Subpostmaster is permitted to hold Post Office Counters Ltd cash normal to meet payments at his sub-office after due allowance has been made for expected receipts and in accordance with official accounting and security instructions.
3. The Subpostmaster is expressly forbidden to make use of the balance due to Post Office Counters Ltd for any purpose other than the requirements of the Post Office service; and he must, on no account apply to his own private use, for however short a period, any portion of Post Office Counters Ltd funds entrusted to him. He must also be careful to keep the Post Office money separate from any other monies. Misuse of Post Office Counters Ltd cash may render the offender liable to prosecution and, or, the termination of his Contract of Appointment.

ACCOUNTS

4. The Subpostmaster must ensure that accounts of all stock and cash entrusted to him by Post Office Counters Ltd are kept in the form prescribed by Post Office Counters Ltd. He must immediately produce these accounts, and the whole of his sub-office cash and stock for inspection whenever so requested by a person duly authorised by the Regional General Manager.

SECURITY OF CASH, STAMPS ETC.

5. The Subpostmaster is held strictly responsible for the safe custody of cash, stock of all kinds and other Post Office Counters Ltd property, papers and documents, whether held by himself or by his Assistants, and should keep them in a place of security, especially at night.
6. The Subpostmaster is responsible for maintaining a standard of security sufficient to enable him to meet the obligations laid on him by paragraph 5 for the safe keeping of Post Office Counters Ltd cash and stock placed in his care. If any circumstances arise which lead him to doubt whether he can do so he should immediately consult the Regional General Manager.
7. In deciding the standard of security which it would be reasonable to require under paragraph 6 Post Office Counters Ltd will have regard to (a) the circumstances in which the Subpostmaster was appointed, and in particular the standard of security then accepted; (b) the length of time since his appointment; and (c) any particular circumstances affecting the sub-office which appear to be relevant.
8. All vouchers for payments e.g. Postal Orders, Allowance Dockets etc., should be placed in a suitable receptacle (cardboard box or strong envelope), labelled "Paid Vouchers" and at the close of business kept separately from cash and stock in another secure place, such as a locked drawer or cupboard.
9. The Subpostmaster must be careful to keep his stocks of all kinds in such a manner that they remain in good condition. The stocks must be protected against damp and dust.
10. Datestamps used for authenticating documents (e.g. Postal Orders) or stamping correspondence must be kept in a position on the counter where they are out of reach of members of the public. When not needed for work they must be locked away.
11. Precautions should be taken to guard against the risk of fire.

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LOSSES

12. The Subpostmaster is responsible for all losses caused through his own negligence, carelessness or error, and also for losses of all kinds caused by his Assistants. Deficiencies due to such losses must be made good without delay.
13. The financial responsibility of the Subpostmaster does not cease when he relinquishes his appointment and he will be required to make good any losses incurred during his term of office which may subsequently come to light.

GAINS

14. Surpluses may be withdrawn provided that any subsequent charge up to the amount withdrawn is made good immediately.

THEFT OR BURGLARY

15. If a theft or burglary is committed or attempted at a sub-office, whether or not official cash or stock is stolen, the facts must be reported at once to the Police and to the Regional General Manager by the person who first makes the discovery.

MISSING OR STOLEN STOCK

16. If a Subpostmaster considers that any stock items have been accidentally lost, or stolen he should make a report, in accordance with Appendix 1, as quickly as possible to the Regional General Manager.

RELIEF

17. **COUNTER LOSSES** A Subpostmaster may exceptionally not be required to make good the full amount of certain losses at his office. If he feels entitled to relief in making good a loss he should apply to the Retail Network Manager.
18. **THEFT OR BURGLARY** The question of granting relief will depend upon whether the Subpostmaster has taken reasonable precautions to safeguard the official cash and property.
19. **FRAUD** All cases of fraud or attempted fraud should be reported immediately to the Regional General Manager.

(APPENDIX 1 FOLLOWS)

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APPENDIX 1

ACCIDENTAL LOSS

If at any time any items of stock (including stock of no intrinsic value such as motor vehicle licences) is found to be missing. Steps must be taken at once to ascertain what has happened to the missing items. The serial numbers must be ascertained (see 2(a)) and verified by examination of items in stock, and the requisition forms examined to discover whether or not any of the items purport to have been issued out of sequence. All the requisition forms for the previous 3 months must at the same time be impounded and held for instructions. If, after careful search, the missing items cannot be found and are thought to have been mislaid only, or inadvertently destroyed, a preliminary report of the loss giving the serial numbers of the items in question must be sent to the Regional General Manager.

STOLEN ITEMS

1. If as a result of burglary, break in, theft, or suspected theft any items of stocks are missing the facts should be reported as quickly as possible to the Regional General Manager.
2. The further details which will be required, and which should be obtained and submitted to the Regional General Manager at the earliest opportunity, are as follows:
 - (a) The denominations, total values and serial numbers of missing or stolen items, so far as they are known, with serial numbers of any remaining stocks.
 - (b) A statement as to whether the date stamp of the sub-office has been stolen, and if so, particulars of the type in it when stolen. If the date stamp has not been stolen a statement should be given which should intimate whether there is a reason to believe that it has been used upon the stolen items.
 - (c) A specimen impression of the date stamp and, if it was stolen, particulars of the type in it when stolen.

- (d) A statement of the circumstances which are thought to show that a theft has been committed and of the supposed date, time and method of commission. It should include, if possible, written report from the person who last saw the missing items and the person who first discovered the loss. The former should say when the items were last seen, in what place and in what kind of receptacle (locked or unlocked) they then were. The latter should state how and when the loss was discovered and describe exactly the condition of the place and of the receptacle from which the items were apparently taken.

- (e) Particulars of any cheques, including the transaction for which they were accepted.

END

PT/01

AUDIT RECORD QUERY

| | | | |
|--------------------|---|-------------|----------|
| Originator: | Graham Ward Post Office Ltd Security Casework Manager PO Box 1 CROYDON CR9 1WN | Date | 24/04/06 |
| Telephone: | GRO | | |

| | | | |
|--|----|----------------|-----------------|
| Witness Statement (delete as applicable) | No | REF NO. | ARQ 0607/046 |
|--|----|----------------|-----------------|

| Information Requested | | | |
|---|--|--------------------|--|
| Date range: | 09/02/06 – 08/03/06 | Post Office | SOUTH WARNBOROUGH SPSO 092904 |
| GENERAL DESCRIPTION FORMAT REQUIREMENTS: | <p>A report of all transactions and events for the office for the relevant days (See attached list), including remittances received, transfers between stock units and error notices.</p> <p>We would like the following format for logs (in Excel format with each category in a separate column):</p> <p>Balancing Period; Cash Accounting Period; Session Type - i.e. Serve Customer, Reversal. Rem In etc Transaction No; Session Indicator; Date; Time; Stock; User ID; Transaction Type; Amount £p</p> <p><i>2 columns specifying whether an OBCS (& state) of scan accompanied the transaction</i></p> <p><i>(Session Indicator is whatever way the system has of indicating that individual transactions are linked)</i></p> | | |

EXHIBIT NO 3

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| | | | |
|--------------------------|--------------------------------|-------------|-----------------|
| Specific Details: | (PAN or equivalent identifier) | | |
| Signed | Graham Ward | Date | 24/04/06 |

RP/01

| ReCALL - [Outlet Log Entries] | | | |
|--------------------------------------|------------|----------------------|--|
| File Edit System Administration Help | | | |
| 092904 SOUTH WARNBOROUGH SPSO | | | |
| Add | | Edit | Delete |
| Date Of Entry | Entered By | Log Entry Type | Details |
| 10-Mar-2006 | kingmi01 | Special Delivered | 3.5k for SD del 13/03. Office will reopen on Mon 13/03. |
| 09-Mar-2006 | kingmi01 | Branch Exceptions | Week 49. Office is well over holding indeed, looking at wed planned returns, office isnt returning anything at all, apprantley office now closed see log entry below. |
| 09-Mar-2006 | kingmi01 | T/P Call Received | Call from Bournemouth Area Intervention Manager. Office closed as Spmr suspended, re-opens on Monday with Relief Spmr. SD requested for delivery on Monday 13.03.06 of 3.5k.SM. |
| 08-Mar-2006 | kingmi01 | Useful Information | Audits going in to office. Closed UFN. RP |
| 06-Mar-2006 | kingmi01 | Phone Call to Outlet | Levels of cash very high, office needs to return c 25k. Tried to call office Spms not in the outlet until later. Rang CIT to ensure that they call on Wednesday to collect. Advised Spms to return 25k. RP |

EXHIBIT NO 5

11

12

AS101

| LAST BRANCH TRADING STATEMENT DATE | 08/02/2006 |
|------------------------------------|------------------|
| Cash on hand | 35,515.83 |
| Cash awaiting collection | 2,751.00 |
| Suspense | 375.00 |
| Other MOP | |
| ForEx | 214.52 |
| Postage (1p to £5 only) | 5,690.00 |
| Total | 44,546.35 |

| | |
|---------------------|----------|
| Summary of Receipts | 16953.38 |
| Summary of Payments | 15731.93 |

| | |
|----------|-----------|
| Subtotal | 45,767.80 |
|----------|-----------|

| | Office Snapshot | Revised Office Snapshot | On Hand at Audit | Difference |
|---------------------------------------|------------------|-------------------------|------------------|-------------------|
| Cash on hand | 37,360.06 | 37,360.06 | 1,933.48 | -35,426.58 |
| Cash awaiting collection (pouches) | | 0.00 | 3,126.00 | 3,126.00 |
| Suspense | 3,126.00 | 3,126.00 | 0.00 | -3,126.00 |
| Other MOP (includes cheques) | | 0.00 | 0.00 | 0.00 |
| ForEx (Sterling Equivalent) | -2.82 | -2.82 | 0.00 | 2.82 |
| Postage (1p to £5 only) | 5,194.24 | 5,194.24 | 4,675.03 | -519.21 |
| Stock discrepancies revealed at audit | | 0.00 | -640.15 | -640.15 |
| Total | 42,551.48 | 45,677.48 | 9,094.36 | -36,583.12 |

| | | | | |
|---|-----------|-----------|--|------------|
| Nett Discrepancy As Per Office Snapshot | | 0.00 | | 0.00 |
| Nett Cash Adjustment As Per Snapshot | | | | |
| Total | | 45,677.48 | | -36,583.12 |
| Corrected Balance Due To P.O. | 45,677.48 | | | |

| | |
|---------------------------------|-------------------|
| Current Trading Position | -36,583.12 |
| (See Measures Sheet) | |

| ONLY USE For Audit Of Owner In First Trading Period Since Migration Without A Nil Nett Discrepancy | |
|--|--|
| Cash Surplus As Per Cash A/C | |
| Cash Shortage As Per Cash A/C | |

- NB:
- 1) F10 Should agree with Office Snapshot at all times.
 - 2) F19 should agree with I15 except when amounts are entered on Measures sheet for pending transaction corrections or outstanding debt - as advised by transaction correction duty on day of audit.
 - 3) For full breakdown of discrepancies refer to Measures page.
 - 4) Measures page should be used to write report and for R/B reports.

EXHIBIT NO 6

A5/02

12

CASH ON HAND

| CASH | ON HAND | DECLARED | DIFFERENCE |
|-------------------|-----------------|-------------|-----------------|
| £100 | 0.00 | | 0.00 |
| £50 | 50.00 | | 50.00 |
| £20 | 460.00 | | 460.00 |
| £10 | 330.00 | | 330.00 |
| £5 | 95.00 | | 95.00 |
| £1 Notes | 0.00 | | 0.00 |
| £5 Coin | 15.00 | | 15.00 |
| £2 coins | 38.00 | | 38.00 |
| £1 coins | 315.00 | | 315.00 |
| 50p | 103.50 | | 103.50 |
| 20p | 250.20 | | 250.20 |
| 10p | 103.50 | | 103.50 |
| 5p | 56.30 | | 56.30 |
| 2p | 32.44 | | 32.44 |
| 1p | 22.03 | | 22.03 |
| Unusable | 62.51 | | 62.51 |
| Sub Total | 1,933.48 | 0.00 | 1,933.48 |
| LOTTERY | 0.00 | | 0.00 |
| TOTAL CASH | 1,933.48 | 0.00 | 1,933.48 |

| Stock Unit | | |
|-------------------|-----------------|-------------|
| £100 | | |
| £50 | 50.00 | |
| £20 | 460.00 | |
| £10 | 330.00 | |
| £5 | 95.00 | |
| £1 Note | | |
| £5 coin | 15.00 | |
| £2 | 38.00 | |
| £1 | 315.00 | |
| 50p | 103.50 | |
| 20p | 250.20 | |
| 10p | 103.50 | |
| 5p | 56.30 | |
| 2p | 32.44 | |
| 1p | 22.03 | |
| Unusable | 62.51 | |
| Lottery | | |
| Total Cash | 1,933.48 | 0.00 |

| CHEQUES | Amount |
|--------------|-----------------|
| ON HAND | 0.00 |
| PROCESSED | 3,730.25 |
| TOTAL | 3,730.25 |

Please note: £5 Trafalgar coin return by 10-02-06 (see

CHEQUES ON HAND AT AUDIT

| Service | | Service | | Service | | Service | |
|---------|--|---------|--|---------|--|---------|--|
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| | | | | | | | |

EXHIBIT NO 7

South Warnborough Cash On Hand Schedule

| CASH ACCOUNT PERIOD/ BRANCH TRADING PERIOD | DATE | CASH ON HAND | INWARD REMITTANCE | OUTWARD REMITTANCE | DISCREPANCY |
|---|------------|--|-------------------|--------------------|-------------|
| 11 | 09/03/2006 | £ 1,933.48 | | | |
| 10 | 08/02/2006 | £ 35,515.83 | | £ 2,500.00 | -£6.74 |
| 9 | 13/01/2006 | £ 32,629.81 | | | -£177.62 |
| 8 | 07/12/2005 | £ 29,977.65 | | | £7.76 |
| 7 | 09/11/2005 | Page 1 of statement missing, thus cash on hand & discrepancy figures not known | | | |
| 28 | 05/10/2005 | £ 26,393.96 | £ 1,290.00 | | -£14.39 |
| 27 | 28/09/2005 | £ 25,871.53 | | | -£7.57 |
| 26 | 21/09/2005 | £ 25,772.05 | | | -£0.98 |
| 25 | 14/09/2005 | £ 25,313.95 | £ 750.00 | | -£142.44 |
| 24 | 07/09/2005 | £ 23,470.76 | | | -£171.07 |
| 23 | 31/08/2005 | Cash Account Final not available | | | |
| 22 | 24/08/2005 | £ 24,667.19 | £ 2,000.00 | | -£188.31 |
| 21 | 17/08/2005 | £ 23,722.92 | £ 1,250.00 | | -£185.60 |
| 20 | 10/08/2005 | £ 22,220.92 | | | -£177.79 |
| 19 | 03/08/2005 | £ 23,349.29 | | | -£195.54 |
| 18 | 27/07/2005 | £ 23,917.86 | | | -£200.04 |
| 17 | 20/07/2005 | £ 22,674.01 | £ 1,000.00 | | -£202.27 |
| 16 | 13/07/2005 | £ 22,423.18 | | | -£233.87 |
| 15 | 06/07/2005 | Cash Account Final not available | | | |
| 14 | 29/06/2005 | £ 20,303.85 | | | -£50.78 |
| 13 | 22/06/2005 | £ 20,916.29 | | | -£138.14 |
| 12 | 15/06/2005 | £ 20,937.28 | | | -£145.55 |
| 11 | 08/06/2005 | £ 20,258.84 | £ 2,500.00 | | -£36.52 |
| 10 | 01/06/2005 | £ 19,250.58 | £ 1,250.00 | | Nil |
| 9 | 25/05/2005 | £ 19,039.05 | | | £160.91 |
| 8 | 18/05/2005 | £ 18,880.86 | | | £24.55 |
| 7 | 11/05/2005 | £ 19,149.24 | | | -£31.92 |
| 6 | 04/05/2005 | £ 18,813.67 | £ 2,500.00 | | -£30.69 |
| 5 | 27/04/2005 | £ 17,913.67 | £ 2,000.00 | | -£8.68 |
| 4 | 20/04/2005 | £ 17,871.35 | £ 1,000.00 | | -£7.25 |
| 3 | 13/04/2005 | £ 18,109.82 | | | £274.54 |
| 2 | 06/04/2005 | £ 18,578.14 | £ 2,500.00 | | £259.91 |
| 1 | 30/03/2005 | £ 15,992.33 | | | -£730.40 |
| 52 | 23/03/2005 | £ 18,441.16 | £ 2,250.00 | | -£724.34 |
| 51 | 16/03/2005 | £ 15,740.43 | £ 2,000.00 | | -£732.85 |
| 50 | 09/03/2005 | £ 14,978.54 | | | -£717.18 |
| 49 | 02/03/2005 | £ 14,944.55 | | | -£710.54 |
| 48 | 23/02/2005 | £ 18,055.60 | £ 3,500.00 | | -£725.40 |
| 47 | 16/02/2005 | £ 14,941.38 | £ 750.00 | | -£9.84 |
| 46 | 09/02/2005 | £ 15,049.72 | | | -£22.59 |
| 45 | 02/02/2005 | £ 15,401.07 | | | -£17.39 |
| 44 | 26/01/2005 | £ 17,080.12 | | | -£23.06 |
| 43 | 19/01/2005 | £ 17,609.56 | | | -£19.44 |
| 42 | 12/01/2005 | £ 18,193.50 | | | -£20.11 |
| 41 | 05/01/2005 | £ 21,345.34 | £ 4,500.00 | | -£20.09 |
| 40 | 29/12/2004 | £ 18,727.61 | | | -£41.40 |
| 39 | 22/12/2004 | £ 19,775.89 | £ 1,500.00 | | -£47.85 |
| 38 | 15/12/2004 | £ 17,633.02 | £ 2,000.00 | £ 2,000.00 | -£47.54 |
| 37 | 08/12/2004 | £ 14,576.02 | £ 2,000.00 | | -£52.14 |
| 36 | 01/12/2004 | £ 15,951.92 | £ 2,000.00 | | -£47.38 |

G08/1

EXHIBIT NO 8

14

Prepared Statement
Of
Jo Hamilton

G0B/2

I took over the running of South Warnborough village shop in October 2001. At the time there was a sub-postmaster and another woman who was trained to work in the Post Office. However after one month she handed in her notice to leave on Christmas Eve.

I was persuaded to take over the sub-post office under the direction of the sub-postmaster.

My first day of training was 24th December 2001 by someone from the Post Office. I then had two weeks of half day training sessions. At the time I did not attend any training days. At the beginning, we basically sold stamps and cashed pension books. There was nothing very technical about it. I was shown how to balance the end of week, which I mastered with the help of one of my staff.

When I took over the shop and was running the Post office for the sub postmaster, there were manuals in the office, but they were old and not updated. Whilst I continued to receive updates, I had no training as to how to update the manual, nor did I know how old the manual was in the first place. In addition to this, I have always been encouraged to ring the help desk rather than refer to the manual.

The Post Office authorities became more and more remote.

I took over as sub-postmistress in October 2003. I was not audited at any stage after I took over as sub-postmistress.

On one occasion after I took over there was a shortage of £1500 which I could not explain or work out how it had happened. I cannot remember who I spoke to about it. It was either the helpline or Colin Woodbridge. I was told what to do and it immediately doubled the shortfall to £3000. I was told to send in a month's transaction logs which I did. They could not work out what had happened and told me I had to repay all of the £3000 which they took out of my pay.

After that there was another error making a shortfall of £750. They took that out of my pay as well.

Neither error triggered an audit. In fact I have never been audited during my time as sub-postmistress until now.

Since taking over we have moved to card accounts, electronic banking and all sorts of systems have been introduced. It has turned a very small sub-post office into a bank for which I have received no training.

When we switched from weekly cash accounts to monthly trading, my training consisted of the Post Office sending me a DVD when I do not have a DVD player.

EXHIBIT NO 9

15

All transactions are now done on a screen. But the screen would not let me question any errors.

The Post Office systems are shambolic. On one occasion I swiped a debit card for foreign currency which I subsequently discovered I should not have done as it ended up with the customer being charged twice. I had to refund the customer but I never knew whether the Post Office credited me.

I returned traveller cheques to Hemel Hempstead in the wrong pouch. I was never credited for them.

If I missed the cut off date for obsolete stock overnight the value of the stock would be converted to cash on the system even though the cash is not there. There is no way of going into the screen to alter it because the icon has disappeared.

We only ever had one user ID, as I had received no training in how to change or create new user IDs. Consequently, all the staff used the same user ID.

These are just a very few examples of problems that spring to mind.

I have never been trained properly.

I have never understood the system except right at the beginning.

Consequently I cannot answer any questions as I do not know the answers.

I can say that I have never stolen any money or acted dishonestly.

GRO

✓ 5th May 2006
witnessed by:

GRO

KATE SOLICITOR



This document explains your legal rights. It is important that you read and understand it.

DATE SHOWN 5/5/06 TIME 12:14 HRS

COB/3

Because you are suspected of having committed a criminal offence which may result in a criminal prosecution I must inform you that:

You do not have to say anything, but it may harm your defence if you do not mention when questioned something which you later rely on in court. Anything you do say may be given in evidence.

Do you understand?

YES
.....
(Reply to be written by person being interviewed) #

(If necessary the interviewee should be asked if they require any clarification of the caution and if so be provided with an explanation)

I must also inform you that:

1. You are not under arrest.
2. You are free to leave if you wish. (If the interview is being conducted anywhere other than Royal Mail premises consent must also be obtained from the interviewee and person entitled to grant entry to premises, to carry out the interview there)
3. If you do remain you have the right to legal representation and advice including the right to speak with a Solicitor either in person or on the telephone. (The Solicitor will give you advice regarding Legal Aid*). I can provide you with assistance in contacting a solicitor if you wish.
4. You are entitled to read the Police and Criminal Evidence Act 1984 Codes of Practice if you wish. The Codes set out your legal rights and the rules governing the conduct of this interview.

Have you read 1 - 4 above?

YES
.....
(Reply to be written by person being interviewed) #

Do you understand 1 - 4 above?

YES
.....
(Reply to be written by person being interviewed) #

I wish to speak with a Solicitor as soon as it is practical.

SIGNED GRO

I do not want to speak to a Solicitor at this time

SIGNED.....

If you do not want to speak to a Solicitor at this time, you can change your mind at any time during the interview. Do you understand?

YES
.....
(Reply to be written by person being interviewed)

SIGNED

GRO

DATE 5.5.06 TIME 12.19 HRS

PRINT NAME

J Hamilton

- * This sentence to be deleted when the interview is conducted at a police station
- # If a Solicitor is requested at any stage, the interview must be immediately suspended
- Delete as applicable

REMINDER OF LEGAL RIGHTS ON CONTINUATION OF INTERVIEW

Time and Date: 13:11 5/5/06
Time and Date:
Time and Date:

I confirm that I have been *reminded that I remain under caution/ *re-cautioned and reminded of my legal rights. ~~** I have also been reminded that I am not under arrest and am free to leave if I wish.~~

Signed: **GRO** Timed: 1313 Dated: 5.5.06
Signed: 0 Timed: Dated:
Signed: Timed: Dated:

* I wish to speak with a Solicitor as soon as practical

Signed: **GRO** Timed: 1313 Dated: 5.5.06
Signed: 0 Timed: Dated:
Signed: Timed: Dated:

* I still do not want to speak to a Solicitor at this time

Signed: Timed: Dated:
Signed: Timed: Dated:
Signed: Timed: Dated:

If you do not want to speak to a Solicitor at this time, you can change your mind at any time during the interview.

Do you understand? YES Timed: 1313 Dated: 5.5.06
Do you understand? Timed: Dated:
Do you understand? Timed: Dated:

- * Delete as applicable
- ** When there is a break in questioning under caution and there is any doubt that the person being questioned is aware that he remains under caution, the caution shall be given again in full when the interview resumes.
- # If a Solicitor is requested at any stage, the interview must be immediately suspended.

**Record of Tape
Recorded Interview**



CDS/6

Person Interviewed Josephine Hamilton (JH)
Place of Interview Tanner & Taylor Solicitors Office, Aldershot
Date of Interview 05 May 2006
Time commenced 12.13 Time concluded 12.58
Duration of interview 45 minutes Tape reference no 042769
Interviewing Officer(s) Graham Brander (GB) Colin Price (CP)
Other persons present Kate Taylor (KT) - Solicitor

Exhibit No:
Number of pages: 7
GRO
Signature of interviewing officer producing exhibit

| Tape counter times | Person speaking | Text |
|--------------------|-----------------|---|
| 0.10 | GB | Introductions and voice verification. |
| 1.22 | GB | Goes through CS001 Legal Rights form, including administering caution and giving an explanation of it. |
| 6.50 | GB | Goes through CS003 Post Office Friend form. |
| 9.04 | GB | States that Kate Taylor gave him a prepared statement prior to the commencement of the interview. States he will come back to that in a minute. States that he wants to go back to the day of the audit, 09 March 2006. Asks Jo Hamilton if it is correct that he attended her house on day of the audit. |
| 9.36 | KT | Don't answer any of those questions. Asks if she can have the opportunity to read out the prepared statement first of all. |
| 9.58 | KT | Reads out prepared statement. On completion, states that she is advising her client to answer no comment to all subsequent questions. |
| | GB | States that having read the prepared statement there are a number of questions that he wishes to ask as well as a number of items that he would wish to seek clarification on. |
| 14.19 | GB | I appreciate that you said your client is going to answer no comment but is your client able to clarify anything relating to this prepared statement. |
| | KT | States that at this stage will only be putting forward the prepared statement. |
| | GB | States to Jo that she wasn't in attendance on day of audit, GRO is that correct? |
| | JH | No comment. |

Record of Tape Recorded Interview (continued)

| Tape counter times | Person speaking | Text |
|--------------------|-----------------|---|
| 17.44 | GB | States that she went [GRO] following requests from the Post office to return money in the region of £25,000. Is that correct? |
| | JH | No comment. |
| | CP | Asks if she is prepared to name the assistants that work in the Post Office so that we can get to the bottom of this. |
| | JH | No comment. |
| | GB | Refers to part of statement stating that due to lack of training all staff use the same user ID. Were you really not aware that you could create user ID's/ |
| | JH | No comment. |
| | GB | States that it is a requirement to comply with the Financial Services Act whereby it should be possible to identify who has done what transactions. Asks if she has read and signed something to state that she understands and will comply with the Financial Services Act? |
| | JH | No comment. |
| 20.44 | GB | States that the only user name he can find on Horizon system is JHA001. Is that your user name? |
| | JH | No comment. |
| | GB | Are you suggesting that other people work in the Post Office and serve against the user name JHA001? |
| | JH | No comment. |
| | CP | States that once again it would help our enquiry if Jo could advise on who works in the Post Office. |
| | KT | States that her advice remains I that her client answers no comment at this stage. |
| 22.02 | GB | States that the auditors found cash on hand to the value of £1,933.48. Showing on the Horizon system was £37,360.06, a difference of £35,426.58. Are you able to give any explanation as to why there was such a large difference in the cash shown on the system to what was actually there? |
| | JH | No comment. |
| | GB | States that if she isn't going to answer his questions then he will be treating everyone who works in the shop as a potential suspect or witness. States that ultimately he will have to speak to her staff to ascertain who works in the Post Office and asking them if they have stolen Post Office money. If you're in a position to explain this to me and save those ladies having those questions put |

Record of Tape Recorded Interview (continued)

| Tape counter times | Person speaking | Text |
|--------------------|-----------------|--|
| | | to them, then you've got the opportunity to tell me now. |
| 23.49 | JH | No comment. |
| | CP | Asks if she will give us bank disclosures? |
| | KT | Perhaps we can discuss that after the interview. |
| 25.25 | GB | Shows Branch Trading Statement for period 11. Asks why the cash figure of |
| | | £35,515.83, carried forward from previous Trading statement went down to the |
| | | £1933.48 found by the auditors. |
| | JH | No comment. |
| | GB | Can you think of any possible error or genuine reason why it would have dropped |
| | | by that amount? |
| | JH | No comment. |
| | GB | States that the prepared statement mentions lack of training and alleged errors |
| | | but he can't see anything on it that would shed any light on the £36,583.12 |
| | | deficit. So can you help me out in respect of that? |
| | JH | No comment. |
| | GB | Do you produce the Branch Trading Statements or Cash Accounts? |
| | JH | No comment. |
| | GB | Are you aware that in producing an account you are declaring that it is the true |
| | | cash and stock on hand? |
| | JH | No comment. |
| 28.52 | GB | Have you ever inflated the cash figure on any account at South Warnborough |
| | | Post Office? |
| | JH | No comment. |
| | GB | Asks if the cash figure of £35,515.83 brought forward onto Branch Trading |
| | | Statement period 11 was a true amount of cash on hand from the previous |
| | | Trading Statement? |
| | JH | No comment. |
| 29.52 | GB | Shows Cash Account Final week 36 (w/e 01/12/04). Asks is that your signature |
| | | on the form. |
| | JH | No comment. |
| | GB | States that it shows a £47.38 shortage. Was that a true reflection of how the |
| | | accounts balanced in that week? |
| | JH | No comment. |
| | GB | Shows the cash on hand figure of £15,951.92. Was that a true amount of cash |

Record of Tape Recorded Interview (continued)

| Tape counter times | Person speaking | Text |
|--------------------|--|---|
| 31.10 | JH GB JH GB JH GB | on hand on that day? No comment. Shows Cash Account Final for week 10 (w/e 01/06/05). Is that your signature on the top of the form? No comment. States that there is no discrepancy shown. Asks if it is correct that the account balanced to the penny on that particular week? No comment. Shows cash on hand figure of £19,250.58 and asks if that was a true amount of cash on hand on that day? |
| 32.12 | JH GB JH GB JH GB | No comment? Had that figure been inflated by you on that day? No comment. Shows Cash Account Final week 24 (w/e 07/09/05). Have you signed that Cash Account Final? No comment. States that there is a declared shortage of £171.07. Was that a true statement of how the accounts balanced that week? No comment. |
| 33.21 | GB JH GB JH GB JH GB JH GB | Shows cash on hand figure of £23,470.76 and asks if it was a true amount of cash on hand on that day? No comment. Had you deliberately inflated that cash figure? No comment. Shows Cash Account final week 28 (w/e 05/10/05). States that it was the last Cash Account before moving on to monthly Branch Trading Statements. Have you signed that Cash Account Final? No comment. States that there is a declared shortage of £14.39. Was that a true statement of how the accounts balanced that week? No comment. Shows cash on hand figure of £26,393.96. Was that a true amount of cash on hand for the day that was produced? No comment. |

Record of Tape Recorded Interview (continued)

| Tape counter times | Person speaking | Text |
|--------------------|-----------------|---|
| 34.49 | GB | Shows Branch Trading Statement for period 10. States that the cash on hand figure is £35,515.83. Was that a true amount of cash on hand for that Trading statement? |
| | JH | No comment. |
| | GB | States that the discrepancy in the cash found on audit was £35,426.58. States that this is approximately £90 less than the cash figure shown on Branch Trading Statement period 10. States that either she was either operating on approximately £90 or X amount of money has gone missing between that statement being produced and when the audit was conducted on 09 March. Are you aware of any problems or errors that had occurred that would have resulted in any money going missing between those two periods? |
| | JH | No comment. |
| | GB | Had you stolen any money during that period? |
| | JH | No comment. |
| 36.57 | GB | Have you stolen any Post Office money? |
| | JH | No comment. |
| | GB | Is that why the cash figures are so high because you got into financial difficulty and you've gradually been stealing Post Office money and the cash is being inflated and it's got to the stage where the auditors have come in and only found £1,900 and something on hand. Is it the case that you've been stealing money over a period of time from the Post Office? |
| | JH | No comment. |
| | GB | Is it that you have been deliberately inflated the cash figures to cover the fact that you have been stealing Post Office money? |
| | JH | No comment. |
| | GB | Are you aware of anyone else that's stolen Post Office money? |
| | JH | No comment. |
| 37.43 | GB | Has anyone put you under any pressure to steal Post Office money? |
| | JH | No comment. |
| | GB | Refers to prepared statement and asks her if she can tell him exactly what training she received. |
| | JH | No comment. |
| | GB | States that at time she started working at Post Office Horizon had already been implemented. Asks if she received any training on how to use the Horizon |

Record of Tape Recorded Interview (continued)

| Tape counter times | Person speaking | Text |
|--------------------|--|---|
| 38.58 | JH GB | system? No comment. Refers to part of the prepared statement, which says 'there was nothing very technical about it'. Refers to section in prepared statement covering balancing 'which I mastered with the help of one of my staff'. Is that correct that you've mastered the art of balancing? |
| 40.49 | JH GB JH GB JH GB JH GB | No comment. States that updates are available in a variety of productions including the Counter News. Do you implement those updates? No comment. States that prepared statement says the manuals were old or out of date and she was encouraged to ring the Helpdesk. States that is great because if you don't know the answer or believe your manuals are out of date then the people that are going to give you the answer are the Helpdesk. So whenever you had a problem did you phone the Helpdesk for assistance? No comment. If you had a problem, did you phone anyone other than the Helpdesk for assistance? No comment. Refers to prepared statement whereby it alleges a £1,500 error occurred. Asks when this was? No comment. States that it says that following a telephone call to either the Helpline or Colin Woodbridge the error doubled to £3,000. States that he has Cash Accounts going back to 01/12/04 and hasn't come across a deficit of either £1,500 or £3,000. States that he has produced a schedule detailing deficits in the accounts, a copy of which was supplied to Kate Taylor. Would this alleged shortage have occurred prior to 01/12/04? |
| 44.41 | JH GB JH | No comment. Even if it had, that's some fifteen months prior to the audit. On 01/12/04 the cash on hand was £15,951.92. Are you saying that this £3,000 or £1,500 deficit would have any bearing on the shortage identified on 09/03/06? No comment. Buzzer sounds. |

Record of Tape Recorded Interview (continued)

| Tape counter times | Person speaking | Text |
|--------------------|-----------------|---|
| 45.15 | GB | States that the tapes are coming to an end. States that during the break she may wish to consult with her solicitor including whether bank authority disclosure will be granted. Master Tape seal ref 042769 signed. |
| | GB | Advises Jo that during the break in tapes that she remains under caution. States that when the interview resumes he will go through the legal rights and friend rule again. |
| 46.08 | | Tape machine switched off at 12.58. |

**Record of Tape
Recorded Interview**



Person Interviewed Josephine Hamilton (JH)
Place of Interview Tanner & Taylor Solicitors Office, Aldershot
Date of Interview 05 May 2006
Time commenced 13.09 Time concluded 13.32
Duration of interview 23 minutes Tape reference no 042770
Interviewing Officer(s) Graham Brander (GB) Colin Price (CP)
Other persons present Kate Taylor (KT) - Solicitor

Exhibit No:
Number of pages: 3
GRO
Signature of interviewing officer producing exhibit

| Tape counter times | Person speaking | Text |
|--------------------|-----------------|--|
| 0.09 | GB | Introductions and voice verification. |
| 1.15 | GB | Goes through CS001 Legal Rights form, including administering caution. |
| 5.36 | GB | Asks if there is anything you wish to tell me following your consultation with Kate Taylor. |
| 6.56 | KT | States that Jo is happy to give consent to disclose details of her bank accounts. |
| | GB | States that the prepared statement refers to a loss of £750. States that he had identified a number of discrepancies around that amount between week 48 (w/e 23/02/05) and week 01. States that in week 04 (w/e 20/04/05) it drops down to £7.25. Asks if this is the period of time that she is referring to in her prepared statement? |
| | JH | No comment. |
| | GB | The losses that I have just mentioned. Were they genuine losses that occurred in each of those weeks? |
| | JH | No comment. |
| | GB | Were they losses that you hadn't made good and you'd rolled over a number of weeks. |
| | JH | No comment. |
| | GB | Are you aware of your contractual requirement to make good losses at the time? |
| | JH | No comment. |
| | GB | Have you ever rolled losses, not having made them good at the time? |
| | JH | No comment. |

Record of Tape Recorded Interview (continued)

| Tape counter times | Person speaking | Text |
|--------------------|-----------------|--|
| 11.47 | GB | Refers to the prepared statement dealing with the move to Branch Trading. States that it says she was sent a DVD but did not have a DVD player. States that it is not acceptable if that is supposed to be an excuse for not complying with the training. Did you ask for it to be sent to you in video format or written format? |
| | JH | No comment. |
| | GB | Did you ask anyone how you would go about completing a Branch Trading Statement? |
| | JH | No comment. |
| | GB | States that the last Trading Statement, period 11, was printed by the auditors but there were four others produced prior to the auditors arriving. So were you producing those Branch Trading Statements not knowing what you were doing? |
| 14.00 | JH | No comment. |
| | GB | Asks her to explain the process for producing the Branch Trading Statements for periods 7 –10. |
| | JH | No comment. |
| | GB | States he is giving her one final opportunity to give an explanation as to why there was such a large discrepancy identified in the accounts. |
| | JH | No comment. |
| | GB | Why is it that you went [GRO] following requests to return money to the Post Office? |
| | JH | No comment. |
| | GB | Is it true that you contacted somebody from the federation and advised them that you'd been asked to return money but the money wasn't there? Is that correct? |
| | JH | No comment. |
| | GB | Asks if there's any possibility of adding to the prepared statement, details of the staff that work in the Post Office? States that he may have to obtain denial statements from everyone working in the shop and if Jo can eliminate any that don't work in the Post office then it would save them being asked whether they have stolen Post office money. |
| | KT | Can we take a break so that I can take instructions? |
| | GB | States that we can finish up and if willing, Jo can supply that information via yourself, either after the interview or at a later stage. |
| | KT | States that the amount of paperwork disclosed to her has been very limited. |

Record of Tape Recorded Interview (continued)

| Tape counter times | Person speaking | Text |
|--------------------|-----------------|--|
| | GB | States that he disclosed prior to interview what he anticipated showing her client. Stated that during the interview he had shown a number of cash Accounts and Branch trading Statements. Agreed to allow Kate to take photocopies of the accounts shown at interview. |
| 20.29 | GB | Shows a schedule of Horizon extracts headed All sales Transactions referring to Alliance & Leicester cash deposits for the period 01/02/06 – 06/03/06. States that they are all whole amounts, rounded up to nearest ten pounds. Are you able to give me an explanation as to what these cash amounts relate to? |
| | JH | No comment. |
| | GB | Would these be any of your accounts? |
| | JH | No comment. |
| 22.01 | GB | Administers second caution. Asks, do you wish to clarify anything you have said or add anything else before the end of the interview. |
| | JH | No. |
| 22.32 | | Master tape Seal ref 042770 is signed. |
| 23.09 | | Tape machine switched off at 13.32 hrs. |

WINCHESTER CROWN COURT

THE QUEEN

v

JOSEPHINE HAMILTON

**COPY LIST OF EXHIBITS
AND COPY EXHIBITS**

General Counsel to Royal Mail Group plc
Legal Services
3rd Floor
6a Eccleston Street
Victoria
LONDON SW1W 9LT