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IN THE BRADFORD CROWN COURT

REGINA

-v-

KHAYYAM ISHAQ

**ADDENDUM DEFENCE
CASE STATEMENT**

1. This Addendum Defence Case Statement is served in addition to the original Defence Case Statement dated 29th August 2012.

The Horizon Online system.

2. The malfunctions to the Horizon Online System and the defendant's actions in response included the following:

- i. The Horizon Online system would often crash and freeze and would give inaccurate total figures at the end of trading and/or balance periods ;
- ii. As a result of these problems the defendant called the Horizon Help Desk in the region of 8-10 times a month on the telephone number GRO
These calls were made over a period of about 12 months ;
- iii. The following are some of the reports (date of report and corresponding allocated reference number) made by the defendant to the Horizon Help Desk on telephone number 0845 6011022 using an automated switchboard when he selected the option which dealt with technical problems with the Horizon system.
 - a. 19/04/2010 : Report H-22766041
 - b. 11/05/2010, Report had no Reference Number

Furthermore we have not received any hearsay application to relation to exhibit DW1 and the defence does not agree to its admission at the trial in the absence of the evidence from Dennis Watson himself.

Should you have any enquires then please do not hesitate to contact our Mr Nabi at these offices.

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Musa Patels LLP Solicitors

- c. 24/06/2010, Report H-22792410 ↘
 - d. 10/07/2010, Report H- 22792410 & Report 2572046 *NISC*
 - e. 12/7/2010, Report H-022792410 ↘
 - f. 13/07/2010, Report H-22792410 ↘
 - g. 21/07/2010, Report H-2572046
 - h. 9/08/2010 Report H-2572046
 - i. 10/08/2010 same reference number as above regarding same problem
Report H-2572046
 - j. 11/08/2010 same reference number as above regarding same problem
Report H-2572046
 - k. 12/08/2010 same reference number as above regarding same problem
Report H-2572046
 - l. 16/08/2010 Report H – 16795487
 - m. 1/08/2010 Report T1687336
 - n. 16/09/2010 No reference number
 - o. 6/10/2010 Report H-16923076
 - p. 27/10/2010 Report H-16951682
- iv. It is noted that the telephone call logs recently served by the prosecution deal only with specific identifiable transaction problems (for example a DVLA tax disc issued incorrectly) and not with problems experienced with the Horizon Online system generally whereby erroneous and/or inexplicable results appeared to be produced by the system ;
- v. When a balance and/or trading report produced by the system showed there was a shortage of cash the system would give the defendant an option to “make good the discrepancies” ;

- vi. On occasions the defendant did not accept that he had made an error and requested that the issue be dealt with centrally by the Post Office. On such occasions he received a letter from Chesterfield ("Central") ;
- vii. Approximately twice the defendant called Chesterfield ("Central") on the telephone number 01246 542 325 & 01246 452 460 to discuss the discrepancies and shortfalls and in order to explain the problems he was encountering with the system. No reference numbers were provided by the Chesterfield staff to the defendant but he was assured the matter would be investigated ;
- viii. Specifically in relation to the indictment period the defendant estimates the dates to be Mid September 2010 and Mid December 2010 when such calls were made.
- ix. Prior to the indictment period, the problems and issues were discussed by the defendant with Post Office staff in Chesterfield during the middle of each calendar month from about November 2009 to August 2010.

This addendum defence statement has been read and approved by me.

Signed

GRO

(Khayyam Ishaq)

Date

20TH FEB 2013

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