Witness Name: Stephen Bradshaw

Statement No.: WITN04450100

Dated: 26 June 2023

#### POST OFFICE HORIZON IT INQUIRY

# FIRST WITNESS STATEMENT OF STEPHEN BRADSHAW

I, STEPHEN BRADSHAW, will say as follows...

## Introduction

This witness statement is made to assist the Post Office Horizon IT Inquiry with the matters set out in the Rule 9 Request dated 19 May 2005.

#### Background

- I have been employed by, Post Office Ltd (Formally known as GPO, Royal Mail Group, The Post Office and Consignia) since 1978. During this period, I have covered a number of roles as follows:
  - a. Telegraph Officer (Inland Telegram Service) 1978
  - b. Counter Clerk 1979 1984
  - c. Television Enquiry Officer 1984 1987
  - d. Royal Mail Transport Section 1987 2000 for all roles below
  - e. Royal Mail Collections
  - f. Royal Mail Distribution

- g. Post Office Investigations 2000 to date.
- I applied for the position of Fraud Investigator as per the advertisement in the Gazette.
  - a. I passed the selection process and undertook a two-week course at Wolverton Mill College. On the successful completion of the course I was assigned to Post Office Ltd. Other Successful candidates were assigned to other parts of the business.
  - The role included the investigation of crimes committed against Post
     Office Ltd by its staff, agents and agent's employees.
  - c. I reported to my Line Manager (then renamed Team Leader).
  - d. I found my colleagues and managers to be both competent and professional at all times.
- I have been asked about my role as Security Manager. As above the initial role has remained the same but the job title changed.
- 4. The following applied:
  - a. Disciplinary matters were dealt with by the Contracts Managers (also known as Retail Network Managers – Retail Line Managers).
  - Anybody suspected of committing a criminal offence would be interviewed in accordance with PACE.
  - c. Disclosure of the current available information regarding the enquiry would be given to a solicitor prior to any interview. I do not recall being party to any civil proceedings.
  - d. I do not recall being party to any Litigation case strategy.
  - e. Liaison with other Post Office departments would take place to request

information to enable the facts to be gathered to ascertain if any criminal offence had taken place.

- 5. I have been asked to describe the process of an investigation by the fraud team. The process is as follows:
  - a. Any enquiry would go into the casework team, it would then be assigned via the Line Manager in the first instance to an Investigator in the area, depending on their current workload it could be assigned to an Investigator in another area.
  - b. Contact made (either in person or via a telephone call) with the person to be interviewed / suspect to arrange an interview, their legal rights would be explained over the phone or in person together with the Post Office agreement that a Post Office Friend (normally their Union Rep) could also attend. A suitable time, place and date would be agreed for an interview to take place. This would be confirmed in a letter to the person who was to be interviewed.
  - c. All available information would be obtained for the interview.
  - d. The interview would take place, at the end of the interview they would be given a form telling them what happens to the interview tapes / discs, an offender's report would be submitted to the Criminal Law Team (CLT) or Cartwright King when they took over to see if the evidence was sufficient for a successful prosecution. If the advice was for a prosecution, charging advice would be received, case would be booked into the Magistrates, summons obtained, service and the normal court process then takes place. If there was no plea or a not guilty plea entered a committal bundle would be prepared. If any

further evidence came to light this would be served on the defence by the CLT or Cartwright King together with a statement formally exhibiting the items.

6. All information would be passed to the Financial Investigator for confiscation, if court case costs via prosecution barrister / solicitor would be applied for and if interviewee / suspect had agreed to repay any monies details of account for monies to be paid into would be provided and on occasions person would send cheques directly and these paid into a Bank of Ireland account.

### Relationship with Fujitsu

- 7. Any information required from Fujitsu would be requested via the casework team. Any contact with members of Fujitsu if they had provided a statement would be as a matter of the court process in they may be required as a witness. I do not recall any particular conversations or dialogue with members of Fujitsu.
- 8. I do not recall having any direct contact with any Fujitsu engineers. I have seen the documents listed (FUJ00122938 and FUJ00122939) and can only assume contact was made as a result of advice form the Criminal Law Team.
  - a. I do know of any process in contacting any engineers.
  - b. I have been asked why it was "against process for investigators to approach Fujitsu engineers direct". As stated in paragraph 'a' I do not know what is meant by "against process to approach engineers direct".
  - c. Jane Owen was part of the casework team and I do not recall what her specific role was in any due process.

- d. As far as I am aware any due process would always be followed.
- e. As stated I do not recall having any direct contact with Fujitsu engineers, there may have be occasions when I have attended court and members of Fujitsu have been called.
- 9. I do not fully know what Gareth Jenkins' role was within Fujitsu.
- 10. I did not know that Gareth Jenkins was considered to be an expert witness.
  My understanding of an expert witness is a person who has greater knowledge in their particular field than the ordinary person. I may have spoken with him when at the same court, but I do not recall having any discussions with him regarding his role.

## Relationship with others

- 11. Any contact with Cartwright King Solicitors would have been purely a working relationship basis. I do not recall which lawyer I dealt with for each case.
- 12. Any involvement with the NFSP was on a working relationship basis.

#### Reports & Investigations

The case of Michael Mann

- 13. An enquiry concerning St Annes Post Office was assigned to me. The amount of stock purported to have been returned to Swindon did not tally with the amount of stock received in the pouch. The stock pouches would have been checked by the stock centre.
- 14. Ms Helen Rose was a work colleague within the Security Team and performed whatever role was necessary within the team.
- 15. Ms Rose always behaved in a competent, professional and impeccable manner at all times.

- 16. I am not aware of any involvement Ms Rose may have had.
- 17. I do not recall seeing or reading document FUJ00086811.

#### Second Sight

- 18.I do not recall being involved with Second Sight.
- 19.I have been asked if I am aware that allegations were made about my conduct to Second Sight.
  - a. I was not previously aware of any allegations made about my conduct. I have now read document POL00099689 and I can categorically state that I have never said to any person I have interviewed and definitely not to Jacqueline McDonald that she was the only one in that position. I refute the allegation that I am a liar, I do not know who she was friends with or if they were involved with the JFSA.
  - b. I also refute the claim that Jacqueline McDonald was bullied, from the moment we arrived, the auditor was already on site, conversations were initially with Mr McDonald, the reason for our attendance was explained, Mr and Mrs McDonald were kept updated as the day progressed.
  - c. Ms Katie Noblet was not bullied and was spoken to as part of the investigation to establish the facts of the discrepancy in the accounts. I am not sure what Jacqueline McDonald means that she (Katie Noblet) was running the Post Office under somebody's name and was bullied about wage deductions or jail time. Post Office Ltd could not deduct any monies from Katie Noblet wages as she was either paid by her

- employer (Jaqueline McDonald) or her new employer the person she was allegedly running the Post Office for on their behalf.
- d. Ms Katie Noblet was not being bullied but was being asked if she would provide a statement as part of the on-going investigation. Ms Richards would be seeing how she was coping in running the Post Office branch when Mr McDonald asked us to leave the shop.
- e. Ms Jacqueline McDonald is also incorrect in stating Post Office
   Investigators behaved like Mafia Gangsters looking to collect their bounty with the threats and lies.
- f. I would be grateful if I could have a copy from Jacqueline McDonald of her notes of when these threats and lies were made to her.
- g. Ms McDonald made no mention or made any allegation or comments against myself or my colleagues regarding our behaviour, either during the investigation, at the interview stage (although she did bring a friend who was present throughout the interview) or in court by her barrister or solicitor to either the trial judge or the prosecution barrister. I am also not aware of any complaint being received by POL from Ms McDonald.

#### R V Janet Skinner

20.1 have been asked to set out my recollection of these proceedings and been referred to a number of documents<sup>1</sup>. I was second officer to the Lead

<sup>&</sup>lt;sup>1</sup> [POL00044626], [POL00047345], [POL00047399], [POL00047427], [POL00044624], [POL00044632], [POL00044633], [POL00044656], [POL00044624], [POL00044625], [POL00047427], [POL00045329].

Investigator on this enquiry. The Lead Investigator would ask the questions but if appropriate on occasions the second officer would also ask questions. At the end of the interview as the second officer I would normally oversee the signing of the tape seals and the sealing of the master copy. Any forms that need completing including NPA1 (Non-Police Agencies) a Notification of Proceedings to Police and Antecedents. The Lead Investigator would submit the file.

- 21. There were no concerns, the investigation was conducted in a professional manner at all times.
- 22. I do not have any other reflections about this matter.
- 23.I have looked at INQ00001035 at p25 (internal pages 97 and 98) and I can categorically state that I have never said to any person I have interviewed and definitely not to Janet Skinner "we have dealt with people who have stolen from Post Offices before and like you, we know you haven't done anything". I did not have the jurisdiction to say anything like this nor would I ever make this type of comments to anybody. At the end of an interview the person would be informed of the next stages, i.e. a report would be done, and the file sent off for advice and any decision would be made by the Legal Department.

## R v Hughie Thomas

- 24. I have been asked to set out my recollection of these proceedings and been referred to a number of documents<sup>2</sup>. I was second officer to the Lead Investigator on this enquiry. A telephone call was received concerning an audit shortage at Gaerwen Post Office branch. I travelled to Anglesey with the Lead Investigator. Advice was taken from the Team Leader at the time, Mr Thomas was taken by North Wales Police Offices to Holyhead where he was interviewed.
- 25. There were no concerns, the investigation was conducted in a professional manner at all times.
- 26. I have no other reflections about this matter.

## R v Ishaq

27. I have been asked to set out my recollection of these proceedings and been referred to a number of documents<sup>3</sup>. This enquiry was assigned to me and concerned a discrepancy in the accounts.

<sup>&</sup>lt;sup>2</sup> [POL00044861], [POL00044862], [POL00044864], [POL00044862], [POL00047894], [UKGI00012481].

<sup>&</sup>lt;sup>3</sup> [FUJ00124337], [POL00045133], [POL00045134], [POL00065003], [POL00046224], [POL00046228],

<sup>[</sup>POL00046231], [POL00046235], [POL00057543], [POL00046242], [POL00046243], [POL00046244],

<sup>[</sup>POL00046248], [POL00046249], [POL00046250], [POL00046253], [POL00057582], [POL00058024],

<sup>[</sup>POL00058244], [POL00046264], [POL00059592], [POL00059686], [POL00046272], [POL00059887],

<sup>[</sup>POL00059602], [POL00059308], [POL00046313], [POL00065000], [POL00046342], [POL00046349],

<sup>[</sup>POL00056628], [POL00046359], [POL00046361], [POL00057985], [POL00046394], [POL00046363],

<sup>[</sup>POL00046381], [POL00046393], [POL00056375], [POL00056476], [POL00056548], [POL00056596],

<sup>[</sup>POL00056600], [POL00057078], [POL00057675], [POL00057702], [POL00057967], [POL00058022],

<sup>[</sup>POL00058024], [POL00058025], [POL00058027], [POL00058028], [POL00058035], [POL00058361],

<sup>[</sup>POL00058194], [POL00046243], [POL00059308], [POL00059338], [POL00059441], [POL00059506], [POL00059517], [POL00059551], [POL00059618], [POL00059617], [POL00059652], [POL00059675],

<sup>[</sup>UKGI00001549], [UKGI00001550] [POL00059692],[POL00059729], [POL00059811], [POL00059866],

<sup>[</sup>POL00059877], [POL00059927], [POL00060315], [POL00060567], [POL00046223], [POL00046229],

<sup>[</sup>POL00046236], [POL00046250], [POL00056752], [POL00057584], [POL00057585], [POL00057697],

<sup>[</sup>POL00057723], [POL00060315].

- 28. There were no concerns, the investigation was conducted in a professional manner at all times.
- 29.I have no other reflections about this matter.
- 30. I have been asked about the appropriateness of "placing the burden" on the defendant to "fully particularise" any problems with Horizon before further disclosure was made (POL00046234). I do not consider this to be a burden on the Defendant as this enquiry concerned discrepancies due to the amount of stock that should be on hand compared to the actual amount on hand.
- 31.I have been asked about the appropriateness of the statement that POL "had absolute confidence in the robustness and integrity of its Horizon system and its branch accounting processes" (POL00059686). As far as I can recall this additional statement would have been at the request of Cartwright King and at this time the contents in the statement were considered appropriate. All information from CLT, POL and Cartwright King was there were no issues with the Horizon system.

#### R v Lisa Brennan

- 32.I have been asked to set out my recollection of these proceedings and referred to a number of documents<sup>4</sup>. This enquiry concerning the inflation of P&A dockets.
- 33. There were no concerns, the investigation was conducted in a professional manner at all times.

<sup>&</sup>lt;sup>4</sup> [POL00047317], [POL00047320], [POL00047322], [POL00047324], [POL00047325], [POL00047331], [POL00047335], [POL00047340], [POL00047475], [POL00047491], [POL00047492], [POL00047505], [POL00047515], [POL00047517], [POL00047519], [POL00047529].

34.1 have no other reflections about this matter.

## R V Lynette Hutchings

- 35.I have been asked to set out my recollection of these proceedings and referred to a number of documents<sup>5</sup>. in this case was to report the findings of the court case and the completion of the paperwork at the end of the enquiry as the Investigators had left the team.
- 36. The only paperwork associated with me are the file completion papers.
- 37. I could see no concerns about the conduct of this case.
- 38. I have no other reflections about this matter.

## R v Joan Bailey

- 39.I have been asked to set out my recollection of these proceedings and been referred to a number of documents<sup>6</sup>. This enquiry was assigned to me concerning a discrepancy in the accounts at the branch. Ms Bailey was interviewed in accordance with pace and had legal representation present.

  Ms Bailey received a caution.
- 40. There were no concerns, the investigation was conducted in a professional manner at all times.

<sup>&</sup>lt;sup>5</sup> [POL00057528], [POL00057727], [POL00057750], [POL00057751], [POL00057753], [POL00057997], [POL00058153], [POL00058334], [POL00046635], [POL00058350], [POL00057597], [POL00046712], [POL00057528].

<sup>&</sup>lt;sup>6</sup> [POL00056003], [POL00056097], [POL00056098], [POL00056138], [POL00056141], [POL00057198], [POL00056387], [POL00056388], [POL00056389], [POL00056477], [POL00056629], [POL00057282], [POL00060763], [POL00056365].

41.I have no other reflections about this matter.

#### R v Sefton

- 42.I have been asked to set out my recollection of these proceedings and been referred to a number of documents<sup>7</sup>. This enquiry concerning suppression of deposit dockets was assigned to me. On the day of the audit a letter was handed over which had been jointly prepared by both Ms Sefton and Ms Nield stating they had been with holding customers deposits slips. The slips had been kept in a cupboard behind the counter.
- 43. There were no concerns, the investigation was conducted in a professional manner at all times.
- 44. I have no other reflections about this matter.

#### R v Anne Nield

45.I have been asked to set out my recollection of these proceedings and been referred to a number of documents (listed in items 172 to 186 of the index to this statement). This enquiry concerning suppression of deposit dockets was assigned to me. On the day of the audit a letter was handed over which had been jointly prepared by both Ms Sefton and Ms Nield stating they had been with holding customers deposits slips. The slips had been kept in a cupboard behind the counter.

<sup>&</sup>lt;sup>7</sup> [POL00043961], [POL00044006], [POL00044010], [POL00044014], [POL00044198], [POL00044206], [POL00044052], [POL00057395], [POL00044006], [POL00044198], [POL00057435], [POL00057495], [POL00057648], [POL00057874], [POL00057876], [POL00057944], [POL00059752], [POL00060277], [POL00044024], [POL00044025], [POL00057374], [POL00044024], [POL00044025], [POL00057374], [POL00044047], [POL00060275].

- 46. There were no concerns, the investigation was conducted in a professional manner at all times.
- 47.1 have no other reflections about this matter.

## Post Office v McKnight

- 48.I have been asked to set out my recollection of these proceedings and referred to a number of documents<sup>8</sup>. This enquiry concerning discrepancies in the accounts was assigned to me. The PM did not take part in running the branch and had installed her daughter as OIC. No prosecution took place.
- 49. There were no concerns, the investigation was conducted in a professional manner at all times.
- 50. I have no other reflections about this matter.

## Response to Horizon Issues

51.I have been asked to consider POL00096640 and explain why I am mentioned in this meeting as having carried out an "independent investigation". It was assigned to me as an enquiry due to the branch having a high volume of spoilt postage labels. Mr Walters (the Postmaster) was interviewed in accordance with PACE. It was established they were unsure of the procedures and what the difference is between a spoilt label (when payment is expected) and a rejected label (when no payment is due). The matter was dealt with by the Contracts team and no further action was taken by the Security Team.

<sup>&</sup>lt;sup>8</sup> [POL00069229], [POL00069249], [POL00069265], [POL00072167], [POL00072294], [POL00072295], [POL00072296], [POL00072291], [POL00095382], [POL00069230], [POL00072168], [POL00073930].

52. I was not involved with Lord Arbuthnot or attended any other meetings with public officials relating to the response to Horizon issues.

## **General**

- 53.I have been asked to what extent I considered a challenge to the integrity of Horizon in one case to be relevant to other ongoing or future cases. Each and every case were treated on their own merits.
- 54.I do not know what technical issues were investigated by POL.
- 55. Any technical issues would be dealt with by the relevant team at Fujitsu and dealt with by them and POL.
- 56.I cannot recall, if any, what information I received concerning bugs, errors and defects in the Horizon system.
- 57.I do not have any reflections on these matters or other matters relevant to the TOR.
- 58.1 do not wish to bring any other matters to the attention to the Chair.

#### Statement of Truth

I believe the content of this statement to be true.

Signed:

**GRO** 

Dated: 26 June 2023

## Index to First Witness Statement of STEPHEN BRADSHAW

No.	<u>URN</u>	Document Description	Control Number
1.	FUJ00122938	Email from Penny Thomas to Gareth Jenkins re: Report - Rinkfield	POINQ0129152F
2.	FUJ00122939	Gareth Jenkins comments on Rinkfield Report	POINQ0129153F
3.	FUJ00086811	Horizon data, Lepton SPSO 191320, Draft Report by Helen Rose	POINQ0092982F
4.	POL00099689	Post Office Limited Application Form - Jacqueline McDonald	POL-0099272
5.	POL00096640	Post Office Pack for meeting with James Arbuthnot and other MPs Meeting scheduled for 18th June 2012, 6pm, Portcullis House.	POL-0096223
6.	POL00046234	Memo from Maureen Moors (Post Office Fraud Team) to the Royal Mail Group (Criminal law team) re Khayyam Ishaq - Requesting evidence be reassessed in light of further enquiries by Steve Bradshaw, Fraud Advisor	POL-0042713
7.	POL00059686	Witness Statement of Stephen Bradshaw re Second Sight appointment	POL-0056165
8.	POL00044626	Post Office Limited Interim Report for Jane Louise Skinner (North Bransholme branch/POLTD/0607/0108)	POL-0041105
9.	POL00047345	Witness Statement of Diane Sarah Matthews re Janet Skinner case	POL-0043824
10.	POL00047399	Witness Statement of Stephen Bradshaw (unsigned) in relation to the Janet Skinner matter	POL-0043878
11,	POL00047427	Janet Skinner case study: Notebook Entry by Stephen Bradshaw re Janet Skinner	POL-0043906

12.	POL00044624	Post Office Ltd Interim Report for Janet Skinner (North Bransholme branch)	POL-0041103
13.	POL00044632	Interview Transcript - Janet Louise Skinner	POL-0041111
14.	POL00044633	Summary of tape recorded interview - Janet Louise Skinner	POL-0041112
15.	POL00044656	Summary of tape recorded interview - Janet Louise Skinner	POL-0041135
16.	POL00044625	Investigation Report (Personnel) by Diane Matthews - Janet Louise Skinner	POL-0041104
17.	POL00045329	Notebook Entry from Stephen Bradshaw re Janet Skinner Interview	POL-0041808
18.	INQ00001035	Transcript (25/02/2022): Post Office Horizon IT Inquiry - Ms Stephanie Reilly [WITN0318], Ms Tracy Felstead [WITN0319], Mrs Seema Misra [WITN0065], Ms Janet Louise Skinner [WITN0126].	INQ00001035
19.	POL00044861	Investigation Discipline Report by Diane Matthews - Hughie Noel Thomas	POL-0041340
20.	POL00044862	Investigation Offender Report by Diane Matthews - Hughie Thomas	POL-0041341
21.	POL00044864	Summary of tape- recorded interview of Hughie Thomas - conducted by Diane Matthews and Stephen Bradshaw.	POL-0041343
22.	POL00047894	Hughie Thomas case study: Unsigned witness Statement of Stephen Bradshaw re Hughie Noel Thomas	POL-0044373
23.	UKGI00012481	Noel Thomas Case Study: Witness Statement of Diane Sarah Matthews	UKGI023277-001
24.	FUJ00124337	Comments on Defence Expert's Report by Gareth Jenkins - R v Khayyam Ishaq	POINQ0130551F

25.	POL00045133	Khayyam Ishaq case study: Interview of	POL-0041612
		Khayyau Ishaq - conducted by Stephen	
		Bradshaw - Time	
		commenced - 12:11 and	
		Time Completed - 12:55 (undated)	
26.	POL00045134	Advice on Evidence in R v	POL-0041613
20.	1 000040104	Khayyam Ishaq	1 02 0041010
27.	POL00065003	Stakeholder notification of	POL-0061482
		audit results following	
		audit at Bradford road PO.	
28.	POL00046224	Investigation (Legal)	POL-0042703
		Offender Report by Stephen Bradshaw –	
		Khayyam Ishaq	
29.	POL00046228	Memo from Rob Wilson re	POL-0042707
20.	1 02000-10220	Ishaq case	
30.	POL00046231	Email from Stephen	POL-0042710
		Bradshaw to Paul Williams	
		re suspect offender	
		reporting - 2nd interview -	
		Khayyam Ishaq	
31.	POL00046235	Memo from Rob Wilson to	POL-0042714
		Maureen Moors re Post	
		office LTD v Khayyam Ishaq case	
		POLTD/1011/0186	
32.	POL00057543	Khayyam Ishaq case	POL-0054022
		study: POL v Khayyam	
		Ishaq - Advice from	
		Counsel Martin Smith of	To the state of th
		Cartwright King	DOI 0040704
33.	POL00046242	Email from Martin Smith to	POL-0042721
		Sarah Porter regarding Post Office Ltd - 24676 -	
		Prosecution of Ishaq	
34.	POL00046243	Email from Cartwright King	POL-0042722
O-T*	1 02000 102 10	to Stephen Bradshaw re	. 02 00 .2,22
		Ishaq case	
35.	POL00046244	Letter from Musa Patels	POL-0042723
		Solicitors to Cartwright	
		King solicitors regarding	
		Khayyam Ishaq Bradford	
		Crown Court 4th	
20	DOI 00046340	September 2012	DOI 0042727
36.	POL00046248	Letter from Musa Patel Solicitors to Martin Smith	POL-0042727
		regarding Khayyam Ishaq	
		- trial at Bradford Crown	
		Court - 25th Feb 2013	

37.	POL00046249	Investigation Report by Stephen Bradshaw re Khayyam Ishaq	POL-0042728
38.	POL00046250	Email from Stephen Bradshaw to Paul X Williams and John Breeden re Case Closure Reporting - Khayyam Ishaq	POL-0042729
39.	POL00046253	Khayyam Ishaq Summons, 4th April 2012	POL-0042732
40.	POL00057582	Witness Statement of Stephen Bradshaw dated 2012	POL-0054061
41.	POL00058024	Witness Statement of Stephen Bradshaw re Khayyam Ishaq case	POL-0054503
42.	POL00058244	Defence Case Statement in the case of R v Khayyam Ishaq	POL-0054723
43.	POL00046264	Witness Statement of Stephen Bradshaw - Khayyam Ishaq case	POL-0042743
44.	POL00059592	Witness Statement Post Office Ltd Stephen Bradshaw POL 011 Version April 2012	POL-0056071
45.	POL00059686	Witness Statement of Stephen Bradshaw re Second Sight appointment	POL-0056165
46.	POL00046272	Witness Statement of Stephen Bradshaw - Khayyam Ishaq case	POL-0042751
47.	POL00059887	Witness Statement of Stephen Bradshaw	POL-0056366
48.	POL00059602	Comments on Ishaq Docs by Gareth Jenkins	POL-0056081
49.	POL00059308	Advice on Evidence - Khayyam Ishaq (amended) - Rachel Panter	POL-0055787
50.	POL00046313	Khayyam Ishaq Case Study: Stephen Bradshaw - Notebook Entry re Ishaq interview	POL-0042792
51.	POL00065000	Typed copy of Notebook Entry from Post Office Ltd Fraud Strand	POL-0061479
52.	POL00046342	Letter from Stephen Bradshaw to Khayyam Ishaq in re to Birkenshaw post office branch.	POL-0042821

53,	POL00046349	Interview of Khayyam Ishaq - conducted by Stephen Bradshaw -	POL-0042828
54.	POL00056628	Letter from Stephen Bradshaw to Khayyam Ishaq re: Birkenshaw Post office Branch	POL-0053107
55.	POL00046359	Typed copy of notebook entry from Steve Bradshaw's notebook regarding the Khayyam Ishaq matter	POL00046359
56.	POL00046361	Email from Stephen Bradshaw to Khayyam Ishaq re letter of undertaking and second interview	POL-0042840
57.	POL00057985	Khayyam Ishaq case study: Summary Record of Taped Interview	POL-0054464
58.	POL00046394	Email chain between Stephen Bradshaw and Khayyam Ishaq re letter of undertaking	POL-0042873
59,	POL00046363	Email from Stephen Bradshaw to Khayyam Ishaq re letter of undertaking.	POL-0042842
60,	POL00046381	Email from Stephen Bradshaw to Helen Dickson re FES - Case Number: POLTD/1011/0186 - Branch - Birkenshaw - Branch Code - 163 306 - Interview of Khayyam Ishaq	POL-0042860
61,	POL00046393	Email from Stephen Bradshaw to Khayyam Ishaq re outstanding debt	POL-0042872
62.	POL00056375	Email from Stephen Bradshaw to Paul X Williams re: Fraud - suspect offender reporting, Khayyam Ishaq	POL-0052854
63.	POL00056476	Financial Investigation Sheet - Khayyam Ishaq	POL00056476

64.	POL00056548	Khayyam Ishaq case study: Memo from Rob Wilson to Maureen Moors, Stephen Bradshaw re Post Office Ltd v Khayyam Ishaq	POL-0053027
65.	POL00056596	Memo from Rob G Wilson to Maureen Moors cc Stephen Bradshaw re: POSTVOFFICE LTD -v- KHAYYAM ISHAQ	POL-0053075
66.	POL00056600	Memo from Rob Wilson to Maureen Moors re Khayyam Ishaq further interview	POL-0053079
67.	POL00057078	Khayyam Ishaq case study: Investigation (Legal) report by Stephen Bradshaw re Khayyam Ishaq	POL-0053557
68.	POL00057675	Khayyam Ishaq case study: Email from Martin Smith to Stephen Bradshaw re disclosure bundle for Ishaq case	POL-0054154
69.	POL00057702	Email from Stephen Bradshaw to Helen Dickinson re: Birkenshaw/ Khayyam Ishaq case	POL-0054181
70.	POL00057967	Email from Martin Smith to Steve Bradshaw re: Case no. 246767 - Prosecution of Ishaq	POL-0054446
71.	POL00058022	Note for Case 24676, re: Prosecution of Ishaq.	POL-0054501
72.	POL00058024	Witness Statement of Stephen Bradshaw re Khayyam Ishaq case	POL-0054503
73.	POL00058025	Schedule of Non Sensitive Unused material - Khayyam Ishaq case	POL-0054504
74.	POL00058027	Schedule of Sensitive Unused Material by the Post Office Ltd - Confidential in the case of R v Ishaq.	POL-0054506
75.	POL00058028	Disclosure Officer's Report by the Post Office Ltd - Confidential in the case of R v Ishaq.	POL-0054507

76.	POL00058035	Witness Statement of Stephen Bradshaw re Khayyam Ishaq case	POL-0054514
77.	POL00058361	Khayyam Ishaq case study: Brief for the Prosecution (In the case of R v Khayyam Ishaq)	POL-0054840
78.	POL00058194	Email from Martin Smith to Stephen Bradshaw re: Prosecution of Khayyam Ishaq	POL-0054673
79.	POL00046243	Email from Cartwright King to Stephen Bradshaw re Ishaq case	POL-0042722
80.	POL00059308	Advice on Evidence - Khayyam Ishaq (amended) - Rachel Panter	POL-0055787
81.	POL00059338	Email from Martin Smith to Steve Bradshaw re prosecution case - Khayyan Ishaq	POL-0055817
82,	POL00059441	Witness Statement of Lee Heil - Khayyam Ishaq case	POL-0055920
83,	POL00059506	Khayyam Ishaq case study: Email from Martin Smith to Mark Ford RE: Post Office Ltd- 24676- Prosecution of Ishaq	POL-0055985
84.	POL00059517	Letter from Cartwright King to Ishaq Defence Solicitors re response to letter concerning problems with Horizon system	POL-0055996
85.	POL00059551	Khayyam Ishaq Case Studies - Email from Martin Smith (Cartwright King) to Stephen Bradshaw re Post Office Ltd - 2476 - Prosecution of Ishaq	POL-0056030
86.	POL00059618	Email from Martin Smith to Stephen Bradshaw re letter from Defence Solicitors in Ishaq case	POL-0056097
87.	POL00059617	Notice of Additional Evidence - Khayyam Ishaq	POL-0056096
88.	POL00059652	Email from Martin Smith to Stephen Bradshaw re Ishaq mention hearing	POL-0056131

89.	POL00059675	Letter from Musa Patels LLP Solicitors to Martin Smith , Re: Khayyam Ishaq Trial at Bradford Crown Court 25 February 2013	POL-0056154
90.	UKGI00001549	Email from Martin Smith to Stephen Bradshaw & Mark Ford re Sharron Jenning statement - Ishaq case (date taken from attachment)	UKGI012363-001
91.	UKGI00001550	Witness Statement of Sharron Lisa Jennings - Post Office Review	UKGI012364-001
92.	POL00059692	Khayyam Ishaq Case Study: Email from Martin Smith to Mark Ford re Post Office Ltd - 24676 - Prosecution of Ishaq	POL-0056171
93.	POL00059729	Email from Cartwright King to Defence Solicitors re additional evidence -R v Khayyam Ishaq re. disclosure and asking for evidence of malfunctions.	POL-0056208
94.	POL00059811	Email from Martin Smith to Steve Bradshaw re. Post Office - 24676 - Prosecution of Ishaq	POL-0056290
95.	POL00059866	Email from Martin Smith to Steve Bradshaw re. FW: Ishaq	POL-0056345
96.	POL00059877	Khayyam Ishaq Case Study: Email from Martin Smith to Mark Ford re. Post Office - 24676 - Prosecution of Ishaq	POL-0056356
97.	POL00059927	Expert Report of Beverley Ibbotson & joint statement of Beverley Ibbotson and Gareth Jenkins re r v Ishaq	POL-0056406
98.	POL00060315	Khayyam Ishaq case study: Email from Martin Smith to Mark Ford re. R v Ishaq	POL-0056794

99.	POL00060567	Witness Statement of Stephen Bradshaw re: Khayyam Ishaq relating to horizon balances from new submaster being found in the bin and supporting Ishaq's case	POL-0057046
100.	POL00046223	Email from Steve Bradshaw to Paul X Williams in re : Fraud Suspect Offender Reporting Khayyam Ishaq	POL-0042702
101.	POL00046229	Khayyam Ishaq case study - Memo from Stephen Bradshaw to Legal services in re to Mr Liaquat	POL-0042708
102.	POL00046236	Memo from Stephen Bradshaw to Rob Wilson in re to Ishaq case	POL-0042715
103.	POL00046250	Email from Stephen Bradshaw to Paul X Williams and John Breeden re Case Closure Reporting - Khayyam Ishaq	POL-0042729
104.	POL00056752	Email from Steve Bradshaw to Helen Dickinson re: FI Update	POL-0053231
105.	POL00057584	Khayyam Ishaq Case Study: Witness Statement of Kevin Ryan re Khayyam Ishaq case	POL-0054063
106.	POL00057585	Khayyam Ishaq Case Study: Witness Statement of Andrew Wise re Khayyam Ishaq case	POL-0054064
107.	POL00057697	Email from Steve Bradshaw to Martin Smith, RE: Birkenshaw statements - Khayyam Ishaq	POL-0054176
108.	POL00057723	Email from Steve Bradshaw to Martin Smith, RE: Birkenshaw Brnch Statements - Khayyam Ishaq	POL-0054202
109.	POL00047317	Transcript of tape recorded interview under caution of Lisa Brennan	POL-0043796

110.	POL00047320	Lisa Brennan case study: Record of tape recorded interview in re to Lisa	POL-0043799
111.	POL00047322	Brennan. Summary Record of Tape Recorded Interview for Lisa Margaret Brennan.	POL-0043801
112.	POL00047324	Report from S Bradshaw to Jan Mullin re audit investigation and suspension of Lisa Brennan	POL-0043803
113.	POL00047325	Investigation - Pension and allowance Fraud - Lisa Margaret Brennan.	POL-0043804
114.	POL00047331	Internal memo from Teresa Berridge to Prosecution Support Office, Leeds re: Lisa Margaret Brennan	POL-0043810
115.	POL00047335	Lisa Brennan case study: Interoffice Memorandum from Steven Bradshaw to Teresa Berridge re: Lisa Margaret Brennan.	POL-0043814
116.	POL00047340	Lisa Brennan case study: Interoffice memorandum from Steve Bradshaw to Teresa Berridge re: Lisa Margaret Brennan	POL-0043819
117.	POL00047475	Lisa Brennan case study: Interoffice Memorandum From Steve Bradshaw to Teresa Berridge re: Lisa Margaret Brennan Paper NOS: 7746/3415	POL00047475
118.	POL00047491	Disclosure Officer's Report - Lisa Margaret Brennan	POL-0043970
119.	POL00047492	Schedule of sensitive material in relation to Lisa Margaret Brennan's prosecution	POL-0043971
120.	POL00047505	Internal Memo from Teresa Berridge to Stephen Bradshaw re Lisa Margaret Brennand	POL-0043984
121.	POL00047515	Memo from Steve Bradshaw to John Gibson re: Lisa Margaret Brennan	POL-0043994

122.	POL00047517	Schedule of Non- Sensitive, unused Material in re to Lisa Margaret	POL-0043996
123.	POL00047519	Brennan Version 3.0 11/02. Lisa Brennan Case Study:	POL-0043998
		Internal Memo from Stephen Bradshaw to Miss JS Andrews re Lisa Margaret Brennan	
124.	POL00047529	Post Office Report of prosecution – Lisa Brennan written by S Bradshaw	POL-0044008
125.	POL00057528	Interim/Current Status Report - Lynette Hutchings 2012	POL-0054007
126.	POL00057727	Schedule of Sensitive Material, R v Lynette Jane Hutchings, Investigation Schedule	POL-0054206
127.	POL00057750	Letter from Mr Steve Bradshaw to Miss Rachel Panter re: Committal bundle for R v Lynette Hutchings	POL-0054229
128.	POL00057751	Investigation Schedule non-sensitive - Lynette Jane Hutchings	POL-0054230
129.	POL00057753	Disclosure Officer's report - Lynette Jane Hutchings case study	POL-0054232
130.	POL00057997	Email from Martin Smith to Steve Bradshaw re: Case No. 22796 - Prosecution of Lynette Jane Hutchings	POL-0054476
131.	POL00058153	Lynette Hutchings case study: Email from Martin Smith to Stephen Bradshaw re attendance note for Lynette Hutchings case and costs	POL-0054632
132.	POL00058334	Internal Memo re Lynette Hutchings	POL-0054813
133.	POL00046635	Report: Case Closure reporting in re to Rowlands castle dated 26/09/2012.	POL-0043114

134.	POL00058350	Lynette Hutchings Case Study: Case Closure Reporting re: Lynette Hutchings (Rowlands Castle branch)	POL-0054829
135.	POL00057597	Lynette Hutchings case study: Note for case 22796-Prosecution of Hutchings	POL-0054076
136.	POL00046712	Case file event log report in relation to Rowlands Castle Post Office (Lynette Hutchings case study)	POL-0043191
137.	POL00057528	Interim/Current Status Report - Lynette Hutchings 2012	POL-0054007
138.	POL00056003	Letter from Stephen Bradshaw to Joan Bailey re interview following audit	POL-0052482
139.	POL00056097	Letter from Stephen Bradshaw to Andrew Tench re arrangement of Joan Bailey interview.	POL-0052576
140.	POL00056098	Letter from Stephen Bradshaw to Joan Bailey re arrangement of interview.	POL-0052577
141.	POL00056138	Email from Stephen Bradshaw to Colin Burston re Joan Bailey re suspect offender reporting	POL-0052617
142.	POL00056141	Notebook Entry from Stephen Bradshaw re Joan Bailey interview	POL-0052620
143.	POL00057198	Post Office Ltd investigation report for Joan Bailey	POL-0053677
144.	POL00056387	Joan Bailey - Record of Taped Interview, Date of Interview: 9.3.11	POL-0052866
145.	POL00056388	Joan Bailey - Record of Taped Interview, Time commenced: 13.14, Time concluded	POL-0052867
146.	POL00056389	Joan Bailey - Record of Taped Interview	POL-0052868
147.	POL00056477	Memo from Jarnail Singh to Post Office Security re: Post Office Limited v Joan Francis Bailey	POL-0052956

148.	POL00056629	Letter from Stephen Bradshaw, Fraud Investigator to Mrs Joan Bailey Re: Howey Post Office Branch	POL-0053108
149.	POL00057282	Letter from Steve Bradshaw to Colin Burston, RE: Case closure	POL-0053761
150.	POL00060763	Outcome report to Joan Francis Bailey	POL-0057242
151.	POL00056365	Post Office - Record of Forms / exhibits shown at Interview - Joan Bailey	POL-0052844
152.	POL00043961	Record of Taped Interview - Angela Sefton interviewed by Stephen Bradshaw and Kevin Ryan	POL-0040440
153.	POL00044006	Email from Stephen Bradshaw to Paul Williams and John Breeden re offender reporting Fazakerley Branch- Angela Sefton	POL-0040485
154.	POL00044010	Interview record - Angela Sefton interviewed by Stephen Bradshaw	POL-0040489
155.	POL00044014	Angela Sefton and Anne Nield case study: Letter from Cartwright King to Security Team re POL v Angela Mary Sefton and Anne Nield	POL-0040493
156.	POL00044198	Angela Sefton and Anne Nield case study: List of Offences Report by Stephen Bradshaw re: Fazakerley Branch	POL-0040677
157.	POL00044206	Letter from Hogan Brown Solicitors to Mr S Bradshaw, Re Post office v Mrs Angela Sefton.	POL-0040685
158.	POL00044052	Typed copy of Notebook Entry re Anne Nield and Angela Sefton Clerks at Fazakerley branch	POL-0040531
159.	POL00057395	Notebook Entry by Steve Bradshaw re: Angela Sefton	POL-0053874
160.	POL00057435	Angela Sefton case study: Record of Taped Interview – Angela Sefton	POL-0053914

161.	POL00057495	Angela Sefton and Ann Nield Case Study: Letter from Andrew Bolc to Post Office Ltd, RE: POL v Angela Marty Sefton and Anne Nield	POL-0053974
162.	POL00057648	Post Office Ltd, Record of forms/exhibits shown at interview. Persons interviewed- Anne Nield, Angela Sefton	POL-0054127
163.	POL00057874	Disclosure Officer's report Angela Sefton (no entries)	POL-0054353
164.	POL00057876	Angela Sefton case study: Schedule of non sensitive unused material- investigation commencement date form - R v Angela Mary Sefton	POL-0054355
165.	POL00057944	Schedule of non-sensitive unused material- R v Angela Mary Sefton	POL-0054423
166.	POL00059752	Schedule of non-sensitive unused material - Angela Sefton investigation	POL-0056231
167.	POL00060277	Letter to Hogan Brown Solicitors from Andrew Bolc re. Letter to Defence where there is material to disclose - ongoing disclosure (defence case statement) R v Angela Sefton & another	POL-0056756
168.	POL00044024	Report outlining Anne Nield and Angela Sefton's prosecutions - Fazakerley Branch	POL-0040503
169.	POL00044025	Email from Stephen Bradshaw to Paul Williams and John Breeden re case closure - POLTD/1112/0208 - Fazakerley Branch/ Angela Sefton	POL-0040504
170.	POL00057374	Field Support Team- Event Capture Form Fazakerley - Sefton & Nield	POL-0053853
171.	POL00044159	Email from Paul X Williams to Tim Gordon- Pounder re audit of Fazakerley Branch	POL-0040638

172.	POL00044047	Unsigned Witness statement of Stephen Bradshaw - Fazakerley Branch.	POL-0040526
173.	POL00060275	Witness Statement of Stephen Bradshaw - Fazakerley Post Office – Nield & Sefton	POL-0056754
174.	POL00057413	Email from Stephen Bradshaw to Paul Williams and John Breeden re Offender Reporting Fazakerley Branch - Anne Nield	POL-0053892
175.	POL00044009	Investigation Report by Stephen Bradshaw re Fazakerley Branch - Anne Nield	POL-0040488
176.	POL00057389	Royal Mail Group, Record of Taped Interview Anne Nield	POL-0053868
177.	POL00057350	Schedule of Non Sensitive Unused Material, R v Anne Nield	POL-0053829
178.	POL00057396	Steven Bradshaw Notebook Entry, RE: Fazakerley PO (Anne Nield)	POL-0053875
179.	POL00057413	Email from Steve Bradshaw to Paul X Williams, John Breeden, RE: Offender Reporting- POLTD- Branch- Fazakerley- Suspects name- Nield	POL-0053892
180.	POL00044028	Witness Statement of Kevin Ryan - Fazakerley Branch.	POL-0040507
181.	POL00044027	Witness Statement of Stephen Bradshaw - Fazakerley Branch	POL-0040506
182.	POL00057806	Anne Nield case study: Letter enclosing committal bundle for Anne Nield from Stephen Bradshaw to Cartwright King	POL-0054285
183.	POL00057809	Anne Nield case study: Disclosure Officer's report	POL-0054288
184.	POL00057810	Schedule of sensitive material - Anne Nield	POL-0054289

185.	POL00058307	Witness Statement of Stephen Bradshaw (signed) - Ann Nield / Angela Sefton case	POL-0054786
186.	POL00059750	Schedule of Non-Sensitive Unused Material - Anne Nield	POL-0056229
187.	POL00060246	Email from Defence Solicitors (Laurence Lee & Co) to Cartwright King re Anne Nield	POL-0056725
188.	POL00057812	Investigation Schedule, Schedule of non sensitive Unused material - Anne Nield	POL-0054291
189.	POL00069229	Investigation (personnel) Report by Stephen Bradshaw re Suzanne McKnight	POL-0065792
190.	POL00069249	Email from Kathryn Alexander to Steve Bradshaw re investigation of Susan McKnight	POL-0065812
191.	POL00069265	Financial Investigation Events Log - Suzanne McKnight	POL-0065828
192.	POL00072167	Interview record of Suzanne McKnight	POL-0068730
193.	POL00072294	Internal Memo from Terry Crowther to Stephen Bradshaw re Suzanne McKnight file	POL00072294
194.	POL00072295	Memo from Rob Wilson to Fraud Team cc Stephen Bradshaw Re: POL v Suzanne Elizabeth McKNIGHT - further inquiries	POL-0068858
195.	POL00072296	Email from Stephen Bradshaw to Paul X Williams re Stakeholder Notification on Suzanne McKnight	POL-0068859
196.	POL00072291	Email from Stephen Bradshaw to Paul X Williams re Case Closure Reporting - POLTD/0809/0102 – Suzanne McKnight	POL-0068854
197.	POL00095382	Spreadsheet of SPMs in debt to Post Office (c.2002-2010)	POL-0094965

198.	POL00069230	Investigation (Legal) report by Stephen Bradshaw regarding Suzanne Elizabeth McKnight	POL-0065793
199.	POL00072168	Interview record of Suzanne McKnight	POL-0068731
200.	POL00073930	Email from Paul Williams to Joanne Shelton/Stephen Bradshaw re termination of Susan McKnight contract	POL-0070493