



Post Office Limited
Finsbury Dials
20 Finsbury Street
London
EC2Y 9AQ

Mr Frazer Stuart
Criminal Cases Review Commission
5 Philip's Place
Birmingham
B3 2PW

2 April 2015

Dear Mr Stuart

**Criminal Cases Review Commission ("Commission")
Horizon Computer System – Requirement to Produce Materials**

I write in response to your letter dated 19 March 2015 in which you make a request pursuant to section 17 Criminal Appeals Act 1995 (CAA) for Post Office Limited to:

- i. **produce** a copy of the final report by Second Sight;
- ii. **produce** a copy of the Rose Report, referred to at paragraphs 48-50 of Brian Altman QC's report;
- iii. **preserve all** material relating to:
 - all cases considered by Second Sight;
 - all cases considered by Cartwright King; and
 - all applications for participation in the mediation scheme.

I will deal with each request in the order set out above.

Final report by Second Sight

Second Sight's Final Report is not due to be delivered by Second Sight until 7 April 2015. This report is otherwise known as its "Part 2" Report, the Part 1 Report having been published on 22 May 2014.

The purpose of the Part 2 Report was to describe and expand on common issues raised by multiple applicants to the Complaint Review and Mediation Scheme, which Post Office established to help resolve individual concerns regarding the Horizon system and associated issues.

Second Sight produced a first iteration of its Part 2 Report on 21 August 2014. Post Office did not agree with much of the report and responded on 22 September 2014. I enclose a copy of both of these reports, which have already been disclosed to some of the Complaint Review and Mediation Scheme applicants. Both documents are confidential, having been prepared solely for use in connection with the Complaint Review and Mediation Scheme.

We will of course forward a copy of Second Sight's final Part 2 Report to you once it is received by Post Office, and for the sake of completeness will also send you any response from Post Office. I can also tell you that Second Sight sent a draft of its final Part 2 report to Post Office on 11 March 2015 to which Post Office responded on 27 March 2015. I have not included these documents with this letter given the

imminence of the Final Report, but please let me know if you would like to see this exchange of drafts and I will send them to you.

Please note that the above reports are highly confidential and Post Office discloses them to the CCRC in reliance upon section 25 CAA such that the Commission is not to disclose the reports without Post Office's prior written consent.

Rose Report

Please find enclosed a copy of the "Rose Report" as requested.

Please note that although this report is marked "confidential and legally privileged" Post Office does not assert any legal privilege in the document. However the document is highly confidential and Post Office discloses it to the CCRC in reliance upon section 25 CAA such that the Commission is not to disclose the Report without Post Office's prior written consent.

Preservation of material

- (i) Cases considered by Second Sight - Post Office has requested that during their retainer with Post Office, Second Sight hold all documentation and other materials to our order. We have requested that once they have concluded working for Post Office they return to us all materials in their possession and destroy any duplicate copies in their possession.
- (ii) Cases considered by Cartwright King - I confirm that Post Office has requested Cartwright King to preserve all cases considered by them.
- (iii) All applications for participation in the mediation scheme - I confirm that Post Office will preserve all materials relating to applications for participation in the Complaint Review and Mediation Scheme.
- (iv) Royal Mail Group - to the extent that there may be case material which remains in the possession of Royal Mail Group, we have written to Royal Mail Group requesting that no criminal files are destroyed under existing protocols.

Please let me know if you require any clarification of the above information.

Yours sincerely

GRO

Rodric Williams

Solicitor

For and on behalf of Post Office Limited

Enc.