

R. v. PALMER
Advice on Evidence

25th July 2006

THE CROWN COURT AT BASILDON

THE QUEEN

- v -

SUZANNE LESLEY PALMER

ADVICE ON EVIDENCE

1. I have drafted the Indictment, which accompanies. It is substantially in accordance with that drafted by Mr Singh. However, I have re-drawn the Particulars and corrected the cash on hand figure in Count 2 [see Exhibits @ pp 17 and 22].
2. I have assumed that this was a snap audit rather than a pre-arranged audit: please confirm, in due course.

FURTHER INQUIRIES

3. There are a few issues arising from the papers which I would be grateful to have answered by the Investigation Manager, and appropriate statements made and served to confirm:
 - a) To whom would the Defendant report scratch card errors? Are any records kept? If so they should be made available.

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- b) When were the error notices to which the Defendant refers in interview processed? The I.M. could not supply this answer when her Report was submitted.
- c) Is there any record of the Defendant's training [see LUSHER @ p 5]? Experience has shown that statements to the effect that "training would have been given" are of no value when this is disputed.

FURTHER EVIDENCE

- 4. The following matters of evidence should, please, be attended to:
 - a) Does the Counter Operations Manual contain a section which deals specifically with how scratch card sales should be dealt with (on Horizon)? If so, the relevant portion needs to be copied and served with a supporting statement.
 - b) The SPM contract signed by the Defendant should be obtained, copied and served as above.
 - c) A statement should be obtained from Nick KERR to deal with the matters raised in the interview at EXX pp 32-33 and 48-49.
- 5. When the Jury Bundle comes to be prepared, it should omit the existing pages 7-10 of the Exhibits.
- 6. If not already disclosed to the defence Solicitors, they should be told that the Defendant had not previously been the subject of audit (by way of disclosure).
- 7. I do not presently see the need for a conference, but this should be re-considered when the evidential position is further advanced.

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8. I shall not be available to appear at the PCMH on 18th August 2006 as I am sitting on a Case Management hearing at Kingston Crown Court that day. I would be grateful if whoever attends in my place has available my dates to avoid. My time estimate would be 3 days at most.

9-12 Bell Yard

STEPHEN A. JOHN

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GRO

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Solicitor to Royal Mail Group plc
Corporate Security

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