

Witness Name: Jonathan Longman

Statement No: **WITN04670100**

Dated: 08 November 2023

POST OFFICE HORIZON IT ENQUIRY

FIRST WITNESS STATEMENT OF JONATHAN LONGMAN

I, Jonathan Longman, will say as follows –

1. This witness statement is made to assist the Post Office Horizon Inquiry (the “Inquiry”) with the matters set out in the Rule 9 Request dated 13 October 2023 (the “Request”). The Request contains 64 questions, which I have addressed below. I would like to make the Inquiry aware that I have received legal assistance to produce this statement from my solicitor, Mr Ian Manners of Ashfords LLP. When seeking to obtain assistance from Ashfords LLP, I was assisted by the Post Office with the initial stage of confirming the availability of insurance coverage, to cover the associated legal costs.
2. The Request relates to matters that occurred many years ago and some of the documents provided to me are over 20 years old. As such, I have sometimes found it difficult to recall precise details. However, everything that I include in this

statement is to the best of my recollection and where I cannot recall something or I have had to rely on a document provided, I have ensured to state this clearly.

Background

3. I am a former employee of Post Office Ltd (POL) and I worked within the business for approximately 36 years. I first began working for POL in 1980 and I left in 2016. During this period I held a variety of roles. My first role was as a counter clerk at a local Crown Office for around 2 to 3 years. I then transferred to the local Head Office in Watford where I carried out a variety of roles in different POL departments which included accounts work, processing wages, postcodes and TV Licensing. I then joined the POL Security Team in 2000 as an Investigator where I remained until around late 2012 or early 2013. I deal with what my Investigator role entailed further below. I then worked in the POL Network Transformation Team until I left the business in October 2016. This role involved meeting subpostmasters (SPMs) who wanted to leave the business to discuss their leaving package, as well as meeting SPMs who wished to stay in the business to discuss how we would reinvest government funding POL had received into the branch.

4. I confirm that the qualifications I hold are all those listed in my CV at **[POL00126360]**. With specific reference to my Certificate in Management Studies, Diploma in Management Studies and membership of the Association of Accounting Technicians, I believe that I obtained these at some point between 1983 and 1990.

5. I recall that at some point in the year 2000 POL advertised vacant roles for Post Office Investigators in the Security Team. I cannot recall if the job listing required any necessary qualifications to apply for the role, but I imagine some experience working within the business was desired. I applied for the role internally, sat an interview and was successful. I recall that I had to travel up to Birmingham for the interview and stayed overnight. I believe it was a type of assessment day but cannot recall what I did other than there was an interview during the process.

6. When I first started as an Investigator in the Security Team I remember being given various work books to complete as part of my training for the role. I cannot remember all the specific areas that these workbooks covered, but I think they covered obligations under the Police and Criminal Evidence Act 1984 (PACE), interviewing, conducting searches on premises, giving evidence in court, disclosure and what our role entailed in general, including the duty placed on Investigators to follow all lines of enquiry during an investigation.

7. I also attended a course very early on in the role which ran for about 5 weeks, which again covered the areas I have mentioned above. I believe that I also went on a separate searching course. Unfortunately I cannot remember the exact dates that this would have been. There were two trainers running the course, one was Mick Matthews but I cannot recall the other trainer. I don't recall any formal exams at the end of the training. We were being continually assessed and I think it was the trainers decision as to whether we passed or not. I recall that I did pass.

8. I also received further training as an Investigator in the Security Team by way of shadowing. When I first became an Investigator I did not run any investigations of my own. I would attend an investigation with a more experienced Investigator or my Team Leader to assist and observe them until I built up enough knowledge and experience to run an investigation myself. I cannot remember the point at which it was determined that I was experienced enough to run an investigation of my own. The Team Leader would have made the decision as to when I was ready to carry out my own investigation as they would allocate the cases. I have tried hard to recall how many weeks or months may have passed until I began my own investigations and which was my first investigation to help establish the potential timeframe, but unfortunately I cannot remember.

9. I provide further detail in relation to my training under the following section of this statement – *“Training, instructions and guidance to investigators within the Security team”*

10. I have been asked to set out what I understood the role of an Investigator to involve. I always considered the role to be one where I would be required to carry out criminal investigations against any POL agents or staff who were involved in potential criminal or fraudulent activity against the Post Office, for example, in cases of theft of POL stock and money, false accounting, and pension benefit fraud. I would be required to obtain evidence during the investigation, put together a casefile and complete a suspect offenders report. Where I was a lead investigator on the case I would usually see the case through to the end of a prosecution if one was commenced.

11. During my time as an Investigator I generally worked within a team of around 6 or 7 other Investigators who covered a geographical area and we would report to a specific Team Leader. Over the years the geographical areas I covered changed and I had various Team leaders during my time as an Investigator. The main Team Leaders I can remember are Paul Dawkins, Manish Patel, Lester Chine, Geoff Hall, David Posnett and Jason Collins.

12. I never had any concerns about the competence or professionalism of any of my managers or colleagues during my time working within POL. Some naturally had greater knowledge than others depending on their previous experience within the POL (for example, some were ex-branch managers and had very good general knowledge of Post Office processes and procedures) but overall I believe that all of my managers or colleagues were professional and competent.

13. My role as an Investigator in the Security Team had no involvement in disciplinary matters. I believe that disciplinary matters were dealt with by Contract Managers. On some occasions I may have spoken to a Contract Manager to get further background information on a matter I was investigating (although I cannot recall a specific example of this), but I would have no further involvement in any disciplinary matters that may be running alongside the investigation. I believe that it would be the relevant Contract Manager for the area who would initiate a suspension of an SPM following an incident involving potential criminal liability and then finding a replacement SPM to enable the branch to continue operating

if required. I have no further knowledge of how disciplinary matters were progressed, managed or decided.

14. I also had no involvement as an Investigator in litigation case strategy. I believe it would have been the POL Legal Team who considered this.

15. I was regularly involved in interviewing individuals who were identified as potentially committing a criminal offence against POL during my role as an Investigator. I would always carry out those interviews in accordance with the duties set out in PACE.

16. I was also involved in assisting with the disclosure steps in criminal proceedings. For example, in cases that were being prosecuted and I was the Investigator in that matter, I would assist the POL Legal Team by compiling a committal bundle of all the evidence in the matter which I think was used and referred to in court hearings. I would also complete schedules of unused sensitive and non-sensitive material. I would then send the committal bundle and schedules over to the POL Legal Team for their review. Sometimes they would come back and make requests to move things around in the committal bundle or to notify that a document was on the wrong schedule. Unfortunately, I cannot recall any specific case examples of this but I do vaguely recall that happening on a couple of occasions. I believe that I only ever assisted with gathering disclosure in criminal proceedings – I never made any final decision as to what should be disclosed to the defence, and I do not recall ever disclosing anything to the defence directly. The solicitors in the Legal Team would have been responsible for this.

17. In terms of liaising with other Post Office departments in respect of the progress of cases, I cannot recall all of the departments this may have included but I do believe that I would have liaised with the POL Legal Team to this regard. As explained above, on cases I investigated I would have been assisting the POL Legal Team with gathering documents for disclosure and sending disclosure schedules across to them. It was also not uncommon on cases being prosecuted for the Legal Team to request Investigators to obtain further evidence such as further witness statements, so I would sometimes liaise with them in these circumstances. Another department I may have liaised with to progress a case is Chesterfield (the Financial Division of POL). I would have liaised with Chesterfield to see if there were any transaction corrections that might mitigate a cash shortage. I would also contact the National Business Support Centre (NBSC) at Chesterfield to see what requests for assistance or problems the subpostmaster may have raised and whether it had any relevance to the loss under investigation.

The Security team's role in relation to criminal investigations and prosecutions

18. I confirm that I have considered the following documents provided to me under this heading:

- i) Casework Management Policy (version 1.0, March 2000) ([POL00104747]) and (version 4.0, October 2002) ([POL00104777]);
- ii) Rules and Standards Policy (version 2.0, October 2000) ([POL00104754]);

- iii) "Investigation Procedures Policy (version 2.0, January 2001) ([POL00030687]);
- iv) Disclosure Of Unused Material, Criminal Procedures and Investigations Act 1996 Codes of Practice Policy (version 1.0, May 2001) ([POL00104762]);
- v) "Royal Mail Group Ltd Criminal Investigation and Prosecution Policy" (1 December 2007) ([POL00030578], which appears to be substantially the same as the policy of the same date with a variation on the title at [POL00104812]) (see, in particular, section 3);
- vi) "Royal Mail Group Security - Procedures & Standards - Standards of Behaviour and Complaints Procedure" (version 2, October 2007) ([POL00104806]);
- vii) "Royal Mail Group Crime and Investigation Policy" (version 1.1, October 2009) ([POL00031003]);
- viii) "Post Office Ltd - Security Policy - Fraud Investigation and Prosecution Policy" (version 2, 4 April 2010) ([POL00030580]);
- ix) "Post Office Ltd Financial Investigation Policy" (4 May 2010) ([POL00030579]);
- x) Royal Mail Group Security – Procedures & Standards: "Appendix 1 to P&S 9.5 Disclosure of Unused Material & The Criminal Procedure & Investigations Act 1996" (Version 1, July 2010) ([POL00104848]);
- xi) Royal Mail Group Security – Procedures & Standards: "Committal & Summary Trial Papers & Processes" (Version 1, July 2010) ([POL00104837]);
- xii) "Royal Mail Group Security - Procedures & Standards - The

- Proceeds of Crime Act 2002 & Financial Investigations" (version 1, September 2010) ([POL00026573]);
- xiii) "Royal Mail Group Security - Procedures & Standards - Initiating Investigations" (September 2010) ([POL00104857]);
 - xiv) "Royal Mail Group Ltd Criminal Investigation and Prosecution Policy" (version 1.1, November 2010) ([POL00031008]);
 - xv) Post Office Ltd Financial Investigation Policy (version 2, February 2011) ([POL00104853]);
 - xvi) Post Office Ltd Anti-Fraud Policy (February 2011) ([POL00104855]);
 - xvii) "Royal Mail Group Policy Crime and Investigation S2" (version 3.0, April 2011) ([POL00030786]);
 - xviii) "Post Office Ltd PNC Security Operating Procedures" (August 2012) ([POL00105229]);
 - xix) "Post Office Limited: Internal Protocol for Criminal Investigation and Enforcement (with flowchart)", (October 2012) ([POL00104929]);
 - xx) "Undated Appendix 1 - POL Criminal Investigations and Enforcement Procedure (flowchart)", (October 2012) ([POL00105226]);
 - xxi) The undated document entitled "POL – Enforcement & Prosecution Policy" ([POL00104968]);
 - xxii) "Post Office Limited: Criminal Enforcement and Prosecution Policy" (undated) ([POL00030602]);
 - xxiii) "Conduct of Criminal Investigations Policy" (version 0.2, 29 August 2013) ([POL00031005]);

xxiv) "Conduct of Criminal Investigations Policy" (version 3, 10 February 2014) ([POL00027863]);

xxv) "Conduct of Criminal Investigations Policy" (September 2018) ([POL00030902]).

19. I cannot remember any of these documents from direct memory and I note that some of them postdate my time working within the Security Team as an Investigator. For those that were produced within the period I was an Investigator, I imagine that I would have received them once circulated, but due to the passage of time I am unable to recall.

20. The organisational structure of the Security Team changed many times during my time as an Investigator. I cannot recall what all the changes were but I do recall that in my geographical team there were normally 6 or 7 Investigators and we all reported to a Team Leader (the names of which I have set out above). I believe that our Team Leader would have reported to a Senior Manager in charge of the Investigation/Fraud strand, who would in turn report to the Head of Security. I cannot pinpoint from memory who would of held these specific roles and at which point because those individuals also changed over the years. However I can confirm that it did include Dave Pardoe who was the Senior Security Manager of the Fraud strand who reported to John Scott who was the Head of Post Office Security and managed all the other Senior Team leaders from other strands relating to Post Office security.

21. As well as the Investigatory/Fraud strand, I think there were also 4 or 5 other strands in the Security Team. I cannot remember what all of these strands were but I know that one related to physical security which dealt with alarms, locks and security doors at branches. Later in my career a Financial Investigation Unit was also introduced within the Security Team and they would deal with the recovery of financial losses faced by POL when a crime was committed against the business. I cannot remember when the Financial Investigation Unit was introduced. I do also recall in my early days as an Investigator that there was a Case Management team who were based in Croydon who dealt with administrative matters, but they were later disbanded. Unfortunately I cannot recall when this occurred.

22. Although there were various changes to the organisational structure of the business, the crux of my role as a Criminal Investigator remained constant throughout and the changes did not affect me. The only major change to my role occurred around 2011 or 2012 when Criminal Investigators took on the additional work of physical security at branches.

23. I cannot recall having any involvement in the development or management of any of the policies listed in paragraph 18 above. I believe it is likely that these policies would have been produced by someone more senior to me, but I do not know who.

24. I am unable to recall all of the legislation, policies and / or guidance that governed the conduct of investigations conducted by the Security Team during my time as

an Investigator. The main legislation that I was trained to adhere to was PACE. I also have a vague recollection of being required to understand duties under the Regulation of Investigatory Powers Act 2000. I am sure that there were other Acts that I was made aware of but I cannot recall these in detail. In terms of internal POL policies, I imagine that those that were relevant to the role of Criminal Investigators (including those listed in paragraph 18 above) were circulated, but as explained above, I cannot directly remember when they were circulated. I believe there would have been updates to policies and guidance over the years but again, I am unable to recall when this would have been and what those updates were. What I can confirm is that any time a policy was circulated to me I would have read it and followed it.

25. I am unable to recall what the process was for dealing with complaints about the conduct of an investigation by the Security Team. I do not believe I ever received a complaint against me personally, and I do not remember ever being involved in any complaints that were raised against the Security Team as a whole. I note that there is document provided to me titled "Royal Mail Group Security - Procedures & Standards - Standards of Behaviour and Complaints Procedure" ([POL00104806]). I cannot recall seeing this document. However, I can confirm that for every Court Case where I or my colleagues gave witness statements, a background check would always be made to see whether any individual had any convictions.

26. In terms of receiving supervision, Criminal Investigators in the Security Team could go to their Team Leaders for advice and support if they were unsure how

to progress a matter or just needed to run something by them to ensure the correct steps were being taken. All of the suspect offender case files that were completed by Investigators would always be reviewed by our Team Leaders to make sure all necessary steps had been followed. Our casefiles would also undergo compliance checks to ensure that they were in order before they were passed over to the POL Legal Team. I cannot recall who carried out these compliance checks or who passed the casefiles on to the Legal Team. It may have been the Case Management Team and then when they were disbanded, our Team Leaders. However, I cannot say this for certain.

27. I do not ever recall having direct supervision from any of the individuals who were Senior Management of the Investigation strand or the Head of Security Team during my time as an Investigator. I am not sure if our Team Leaders may have sought advice from these individuals when reviewing an Investigator's casefile.

28. I do not recall that there was any Post Office policy that meant that Crown Office employees who were investigated and/or prosecuted were treated any differently to SPM's, their managers or assistants. I think the policies and practices were the same for both throughout my time as an Investigator.

Audit and investigation

29. I confirm that I have considered the document "Condensed Guide for Audit Attendance" at [POL00104821]. There are two circumstances that I can recall where an Investigator would attend an audit. Firstly, if an ongoing investigation

(for example, relating to suspected pension benefit fraud) had identified a fraud at a branch, then an Investigator would make a request for an auditor to attend a branch to carry out an audit. The investigation team would also attend in that scenario to inform the offender of the circumstances and to begin carrying out any necessary investigations in accordance with PACE. Secondly, Investigators would be called out to a branch if during a routine audit a large loss had been discovered by the audit team. I cannot recall what the figure was to trigger the need for Investigators to be called out to an audit shortage but I think it may have been losses over £10k.

30. Where a shortfall was identified following an audit of a Post Office branch I believe that it may have been Team Leaders for the geographic area that the branch was in who would make the decision as to whether a criminal investigation should be carried out and on what timescale. The reason I believe this is because whenever I attended a branch in this scenario, the instruction to do so would always come from my Team Leader, as did the allocation of the particular case. I don't think Team Leaders had to first receive authority from Senior Management or the Head of Security before allocating matters and instructing Investigators to attend the audit.

31. I believe it would have been the Financial Investigators who would be responsible for deciding whether a case was taken forward as a debt recovery matter. I do not know what the exact criteria was to take it forward for this purpose. I only know that it was the Financial Investigation Team who dealt with the recovery of losses faced by POL as a result of a crime committed against the business, and

their involvement came after the conviction of the individual who committed such crime.

32. When an auditor discovered a discrepancy or large shortfall at a branch, I believe that the Contracts Manager for the area would also be informed alongside the Team Leader. I think it was common for Team Leaders to contact the Contract Manager in these circumstances in order to gather as much information about the Post Office branch in question and the SPM operating it. I do not think the Contract Manager played any role in deciding whether a criminal investigation should take place. As explained earlier in this statement, I believe that Contract Managers only dealt with disciplinary issues relating to whether a suspension was required and if a temporary SPM was needed to fill the role.

33. I cannot recall what the triggers were for raising a fraud case following the identification of a shortfall or discrepancy in a branch. I suspect that the amount of shortfall or whether there was any evidence of false accounting may have had some influence or formed part of the criteria. I cannot remember if the triggers were different for raising a theft or false accounting case either or if the criteria ever changed during my time as an Investigator.

34. In terms of the processes followed in an initial investigation, once an audit shortage had been discovered and a decision had been made to conduct a criminal investigation, generally the Lead Investigator would contact the Auditor on site to establish the facts and obtain any relevant information surrounding the shortage before attending. The Lead Investigator would then attend the branch

with one or two other Investigators. Some of the Investigators would speak to the audit team about the information they had obtained and would review the printouts and balance sheets from the Horizon System. The Lead Investigator would then speak with the identified suspect to inform them of the reason for the investigation, to caution them and to go through and sign off various paper work. I cannot remember what all the paperwork that we went through was but I do recall that some of the documents related to the suspect's legal rights, whether they wished to have a 'Post Office Friend' present, and seeking permission to carry out a search if consensual searches were required. Following this, a taped interview under caution would be conducted with the identified suspect in accordance with PACE, during which evidence such as the Horizon printouts and balance sheets would be referred to.

35. Following attendance at the branch the Lead Investigator would then be required to complete a suspect offender report in line with the template pro-forma used by the POL Security Team, and would put together a casefile with copies of all the evidence obtained. As explained above, casefiles would be sent to Team Leaders for review and eventually they would be passed over to the POL Legal Team. On some occasions the POL Legal Team would send casefiles back to our Team Leader if further information or enquiries were required, for example, extra witness statements. It would then be up to the Lead Investigator on that matter to obtain that extra evidence.

Decisions about prosecution and criminal enforcement proceedings

36. Once a case file had been passed over to the POL Legal Team, I believe that the solicitor who was allocated the matter would review it and make a decision as to whether the SPM, their manager(s) and / or assistant(s) or a Crown Office employee could be prosecuted by the POL. The solicitor would also state what charges would be most appropriate to pursue. I do not know what considerations determined whether a prosecution was brought other than there had to be sufficient evidence and it had to be in the public interest. I believe the solicitor would set out this decision and their reasoning to the Senior Security Manager of the Investigation/Fraud strand for them to review the casefile and authorise the decision to prosecute or not. I think ultimately it was the Legal Team who would decide on the sufficiency of evidence in a case and draft charges, but it was the Senior Security Manager of the Investigation/Fraud strand who would decide whether a prosecution should be commenced. I believe this is how the decision making process was implemented throughout my career as an Investigator.

37. I do not recall Contract Managers ever being involved in deciding whether a prosecution was brought or not. As explained earlier in this statement, Contract Managers dealt with any disciplinary matters running alongside an incident. They would deal with terminating the suspected individuals contract if deemed necessary and would organise bringing in a new temporary SPM in to the branch in question, so that services could continue.

38. I do not know what test was applied by those making prosecution and charging decisions and therefore I cannot comment on what factors were considered at the public interest stage.

39. I do not know what advice, legal or otherwise was given to those making decisions about charging and prosecution. In a suspect offender report Investigators could express an opinion as to whether they thought there was sufficient evidence for a prosecution or not (based on their findings), but these opinions did not dictate the next steps that were taken. As stated above, I believe it was the POL Legal Team who would decide whether there was sufficient evidence to pursue with a prosecution, with the Senior Security Manager of the Investigation/Fraud strand approving that decision. I do not think that the Head of Security would have got involved in this decision making process.

40. I do not know the circumstances in which steps to restrain a suspect's assets by criminal Enforcement methods such as confiscation proceedings were considered. This was dealt with by the Financial Investigation Unit. Criminal Investigators did not really overlap with this team as Financial Investigators tended to get involved after a conviction was obtained and the prosecution case had come to a close. I think sometimes Financial Investigators would contact Criminal/Fraud Investigators to simply get some background information about the case.

Training, instructions and guidance to investigators within the Security team

41. As set out earlier in this statement, when I first became an Investigator I had to complete various work books and attend a 5 week training course. In doing so I believe that I did receive training and guidance on :

- i) interviewing a SPM / SPM's assistant / Crown Office employee who was suspected of a criminal offence;
- ii) taking witness statements in the course of an investigation;
- iii) conducting searches in the course of an investigation;
- iv) the duty on an investigator to investigate a case fully;
- v) obtaining evidence in the course of an investigation;
- vi) an investigator's disclosure obligations;
- vii) drafting investigation reports to enable a decision to be made about the future conduct of a case.

42. I also recall that I also attended Thames Valley Police HQ and carried out an additional search awareness course.

43. In terms of obtaining third party evidence, I think I would have learnt about this as I undertook different case types and from shadowing more Senior Investigators. In terms of evidence from Fujitsu in particular, I cannot remember how training and guidance on this was given to Investigators. I must have received some sort of guidance on this as I do remember that if data from Fujitsu was required in an investigation then the onus was on the Investigator to obtain this through the

correct process. I remember that I would have to fill out a form requesting the period of ARQ data that was required, and this would have to be signed off by a Senior Manager in the Security Team, before being submitted to Fujitsu. ARQ data (transaction log data) was very useful information to have for a variety of Investigations. This data could show which user was logged onto the Horizon system and what transactions they had conducted. Therefore, this data could help with many types of Post Office fraud such as Post Office Card Account Fraud, Postage Label Fraud, Green Giro Fraud, Benefit Fraud etc.

44. When it came to drafting investigation reports, as well as having initial training on this through the 5 weeks course, we also had a pro-forma template to follow which assisted Investigators with setting out their findings. The template was often tweaked during my time with the Investigation Department. As mentioned earlier in this statement, a completed report would be subject to review by compliance checks to identify any failings.

45. With obtaining evidence, I believe that we would have been taught in initial training about the general sort of evidence that would need to be acquired. However, the necessary evidence to obtain would be slightly different depending on the type of criminal investigation. For a new Investigator the evidence required would probably also be relayed by working closely with a more experienced Investigator and through advice from a Team Leader.

46. I confirm I have considered the following documents provided in relation to this subheading:

- i) The Casework Management document at [POL00104747] (version 1.0, March 2000) and [POL00104777] (version 4.0, October 2002);
- ii) Dave Posnett's email dated 23 May 2011 at [POL00118096] and the documents contained within the attached compliance zip file at [POL00118108],[POL00118109], [POL00118101], [POL00118102], [POL00118103], [POL00118104], [POL00118105], [POL00118106] and [POL00118107].

47. I cannot recall whether I received the 2000 or 2002 version of the Casework Management document listed above. From my review, the guidance given in the second, third and fourth bullet points on page 2 of the 2000 version and the first, second and third bullet points on page 2 of the 2002 version suggest that any procedural failures relating to products should appear on a separate report to the suspect offender report in an investigation. I believe that if Horizon integrity was offered as a reason for a shortfall during an initial investigation then I would have thought that this this would have been included in the main suspect offender report. This is because I considered the Horizon IT system to be an independent operating system and not a POL product. I do not believe I ever experienced a scenario where Horizon integrity was offered as a reason for a shortfall during an initial suspect offender interview, but had I experienced this, I would have thought it was something that the POL Legal Team should be aware of so I think I would have included the information in the Suspect Offender report.

48. Compliance checks of investigations were introduced to ensure that Investigators were consistent in putting together their suspect offender file. I cannot recall who carried out these checks but I would have thought it was likely to be the Team Leader and early on possibly the Case Work Management department before they got disbanded. I recall at one point a new form was introduced with a compliance score system, so case files were critiqued. I cannot remember when this was.

49. I do not believe that I had any role in relation to the development, management and any amendment of the suite of compliance documents attached to the email from David Posnett dated 23 May 2011.

50. I have reviewed paragraph 2.15 of the document entitled "Guide to the Preparation and Layout of Investigation Red Label Case Files – Offender reports & Discipline reports" [POL00118101]. The instructions/guidance given suggests that any security, supervision, procedures and product integrity should be highlighted in the offender report in bold text. As mentioned previously, if Horizon Integrity issues were mentioned to me during the initial investigation I believe I would have recorded this in the offender report as a matter of course. However I don't think I would have done it under this particular instruction because I did not consider it to be a POL product. As stated above, I cannot recall any suspected individual saying to me during an initial investigation interview that the Horizon IT was at fault so it is difficult for me to reflect on the relevance that paragraph 2.15 had in relation to POL's disclosure relating to information about Horizon bugs, errors and defects.

51. I do not know who drafted the document entitled "Identification Codes" at [POL00118104] and I do not recall ever seeing this form. I concur that it has been drafted in an entirely inappropriate manner. I do recall that at the end of a suspect offender interview an NPA form had to be completed which required the identification code of the offender to be entered, but it did not look like this. I recall there being references to IC1, IC2, IC3 etc, which I think related to a specific identification code. I think the reason why Investigators had to complete identification codes was so the suspect's details could be entered onto the police national database if a successful conviction ensued.

52. I have considered the email from Dave Pardoe, dated 30 August 2011 at [POL00121772] and the attachment at [POL00121773]. I recall that 'Project Golden' was a special investigation into our Financial Service Specialists (FSS) who operated out of Crown Office Branches. I believe there was a concern held that some of the FSS's were manipulating their sales figures by signing up friends and family to certain products and then cancelling those products. Investigators were asked to conduct interviews with FSS's and submit reports to the relevant Post Office stakeholders. I cannot recall what training was given on this at the time but I suspect it was to do with how FSS's carried out their role. During Project Golden I only carried out the interviews, completed the reports and issued the reports to whoever was dealing with the disciplinary side.

Analysing Horizon data, requesting ARQ data from Fujitsu and relationship with Fujitsu

53. When I was an Investigator I do not recall an SPM ever attributing a shortfall to a problem with the Horizon System at interview or during the rest of the initial investigation stages. In the Seema Misra case, this potential issue was not raised until around a year later. As such, it is hard for me to say what analysis of ARQ data would have been undertaken in such circumstances. As mentioned earlier in this statement, ARQ or Transaction Log data supplied by Fujitsu gives an Investigator information about who was logged onto the Horizon system and what transactions they had carried out. I can only comment from a hypothetical standpoint - had an SPM told me during an initial investigation that they thought a shortfall discovered was due to an error with Horizon, I believe that it is likely I would have asked the SPM when the discrepancies started to occur and whether there was a specific transaction that they made that had not been accounted for properly by the Horizon system. If a certain timeframe or specific transaction was identified then ARQ data could have been requested. Just for clarification ARQ data and transaction logs are one and the same. However, I think it would have had to be Fujitsu who undertook a thorough analysis of any ARQ and other data they may hold in this scenario as they were trained to understand the programming and how the IT operating system worked, so they would be in a much better position to understand where an error may have occurred and why.

54. As I never experienced a situation where a SPM attributed a shortfall to problems with Horizon during the initial investigation stages, I do not know whether ARQ

data was requested from Fujitsu as a matter of course in this situation, nor do I know if such data was provided to that SPM. I know that in the case of Seema Misra that the defence team were provided with ARQ data when a potential problem with the Horizon system was later raised during the trial, but I had never experienced a case previous to this where the integrity of Horizon was questioned and ARQ data being required for that reason. Previous to this case, the reason I would request ARQ data usually fell down to needing to know who logged on to the system at certain times to see who carried out a specific transaction. For example, with a suspected pension benefit fraud Investigators would want to look at the transaction log data.

55. Whenever I did need to request ARQ data from Fujitsu, my main contact was Penny Thomas. However, in the Seem Misra Case I also liaised with Andy Dunks at Fujitsu when it was raised at trial that there was a potential error with the Horizon IT system. I believe that Andy Dunks' role was to analyse fault logs where an SPM had reported issues with the Horizon system. I do not know if I ever liaised with Andy Dunks before this case. I also think that my only contact with Gareth Jenkins from Fujitsu was during the Seema Misra trial. Gareth Jenkins provided a witness statement for the trial and also attended to give live evidence. I comment further on the case of Seema Misra under the following section of this statement – *“Prosecution of Seema Misra.”*

56. Following a review of the documents provided to me, I believe that I would have understood at the time that Gareth Jenkins was an expert witness from Fujitsu who would provide an expert opinion on the integrity of the Horizon IT system in

criminal proceedings. The reason I believe I would of held this understanding is because of the language used in the email chain at [FUJ00152889]. In my email to Jane Owen and Andy Dunks dated 1 December 2012 in that chain I state “*I attach a report from the defence expert where he has highlighted a number of problems with the Horizon system. Our barrister, Warwick Tatford has asked that the problems with Horizon that he has raised in his report are replied to in a witness statement form. I presume that an employee of Fujitsu would have to produce the witness statement*”. As I used the words ‘defence expert,’ in this email I believe that it is likely that I would have thought that any witness statement produced in response (as was being requested by POL’s barrister Warwick Tatford) would also be from an expert. The email illustrates that I presumed the appropriate person to produce this witness statement in response was someone from Fujitsu. I believe I would have said this because it needed to be someone who could address the problems raised in the defence expert’s report relating to Horizon. I would have thought that someone from Fujitsu would have been best placed to do this, as they would understand the Horizon system and programming. I note that later in the chain at [FUJ00152889] on 17 December 2012 Penny Thomas also refers to Gareth Jenkins as “*our expert*” to Jane Owen, and Jane forwards that email to me later that day. Although I think I would have understood Gareth to be an expert witness, I was not aware of any specific rules governing independent expert advice and I cannot recall if I was given any advice or was assisted in this regard.

Relationship with others

57. I cannot recall any involvement that I may have had with Cartwright King Solicitors. I note that one of the documents provided to me mentions Cartwright King Solicitors, but this is dated 2013 and I had left the Security Team by then. I think that all my prosecution cases were dealt with by the Post Office Legal Team.

Prosecution of Seema Misra

58. Prior to receiving the Request I did have a good general recollection of the prosecution of Seema Misra, however, the documents provided to me in relation to this case have helped me to recall the more specific details. In terms of my involvement in the case, I was either asked by my Team Leader or the Lead Investigator to attend West Byfleet Post Office on the 14th August 2008 to assist with an audit shortage that had been reported. The Lead Investigator on the matter was Adrian Morris, I was the 2nd Investigator and a 3rd Investigator (Lisa Allen) also attended. From direct memory I could remember that the shortage was for an amount of around £77,000.

59. I arrived at the branch the same time as Lisa Allen. Adrian Morris was already there, but I am not sure how long he had been there before we arrived. I believe that prior to Lisa and I attending, Adrian Morris had already spoken to the Audit Team to get background information on the shortage and had identified that the suspect offender was Ms Seema Misra. Once Lisa and I had arrived, Adrian Morris explained the amount of the shortage to Ms Misra, cautioned her and explained the steps of the investigation that would happen during the rest of that

day. Ms Misra was then taken through the necessary forms to be completed, for example, the legal rights forms, search consent form, and the form relating to whether she wanted to have a Post Office Friend present.

60. Following this, a search of the flat upstairs was undertaken on a consensual basis.

I then assisted Mr Morris with conducting a taped interview under caution with Ms Misra. After the interview I then left the Post Office and the suspect offender report and casefile was put together by Adrian Morris.

61. I cannot recall the date but following a long period of absence by Mr Morris I was asked to take over the casefile relating to Ms Seema Misra. I think the decision to charge Ms Misra had already been made by Post Office Legal Services by this point. My role from then on was to arrange for summonses to be issued and oversee the case through the court process. I recall that at the first hearing at Guildford Crown Court, Ms Misra and her defence team informed the Post Office Legal Team that a not guilty plea would be entered and that Ms Misra was attributing the audit shortage amount to issues with the Horizon system. Following this there were requests made by the defence for further documentation to be produced relating to the Horizon system data. I was tasked with requesting all the data that the defence were asking for from the relevant people and I made sure to do so. This did not always mean that all data was provided without further question, and I deal with this in further detail below. I also recall that I facilitated a visit to West Byfleet Post Office so that Ms Misra and her defence team could view the Horizon system and hardware at the branch.

62. As indicated by the documents provided with the request, I did give evidence at court in the prosecution of Seema Misra. However, I don't remember being there for very long.

63. I confirm that I have considered the following documents:

- i) The Audit Report dated 16 January 2008 at [POL00058550];
- ii) The record of the interview of Seema Misra at [POL00119329] (part 1) and [POL00119330] (part 2);
- iii) The investigation report (legal) at [POL00044541];
- iv) The memo from Jarnail Singh to the Investigation Team dated 1 April 2008 at [POL00049658];
- v) The emails from April 2008 at [POL00049716];
- vi) The email from Jarnail Singh dated 21 April 2008 at [POL00049717];
- vii) The memo from Jarnail Singh to the Fraud Team dated 18 November 2008 at [POL00044539];
- viii) The Schedule of Charges against Seema Misra at [POL00045010];
- ix) The Summary of Facts at [POL00044613];
- x) The signed indictment at [POL00051149];
- xi) The witness statements of John Longman, dated 6 January 2009 at [POL00045495], 5 February 2010 at [POL00054041] and 12 October 2010 at [POL00055530];
- xii) The email from Phil Taylor, dated 27 May 2009 at [POL00119335];
- xiii) The financial investigation events log at [POL00119281];
- xiv) The transcript of John Longman's evidence, beginning at page 2 at [UKGI00014845].

64. As described above, I first became involved in the Seema Misra case on the 14th August 2008 when I was requested to attend West Byfleet Post Office to assist with an investigation following the discovery of a cash shortfall by Post Office Auditors. My initial involvement was to assist the Lead Investigator, Adrian Morris, with the suspect offender interview with Ms Seema Misra on the 14th August 2008. I remember that Ms Misra was very cooperative and pleasant during the interview. At one point she did get upset during the questions asked, but she confirmed that she was ok to carry on. I was also present when a search was carried out of the flat above West Byfleet Post Office. Again, Ms Misra was very pleasant and cooperative during this. The search was consensual and no items were seized. I cannot recall anything further about the search.

65. As the 2nd Investigator, I was only assisting Mr Morris as the Lead Investigator during the interview conducted with Ms Misra. It was Mr Morris who would have asked the majority of questions. My role was to ensure that Mr Morris completed all the required legal forms and that all relevant questions were asked.

66. Unfortunately I cannot recall what pre-interview disclosure was provided to Ms Misra.

67. At the time of the interview there was no mention made by Mrs Misra that the Horizon IT system was responsible for the cash shortfall.

68. It is my understanding that it was Mr Jarnail Singh (the solicitor who was in the POL Legal Team dealing with the case of Ms Misra) in conjunction with the Senior Security Manager of the Fraud/Investigation strand who made the charging decision. This also seems to be indicated in the memo from Mr Singh at [POL00049658]. I note that the email chain at [POL00119335] indicates that I was spoken to by Warwick Tatford about whether the case for theft was strong enough. I can't remember that conversation but I believe it would have been simply a conversation whereby Warwick set out his thoughts to me on the matter and as per his email, asked me to make further enquiries into the individuals that the defence say committed the thefts. I cannot remember who those individuals were. I do vaguely recall that Dave Posnett said he lived near those individuals and he went to see if they still resided at the specific address to see if they would be contactable. However, they no longer lived there and no forwarding address was available for them. I believe Dave Posnett told me this verbally, but it may have been by email. The most recent email in the chain at [POL00119335] is from Philip Taylor to me and indicates that Mr Singh agreed to Mr Warwick's analysis that the case for theft was strong enough.

69. I have no direct recollection of who authorised the prosecution of Ms Seema Misra. However, I have reviewed the email chain at [POL00049716] and this appears to confirm that it was Dave Pardoe. Whilst it was the POL Legal Team who ultimately dealt with the prosecution, I believe it was standard practice to liaise with a Senior Security Manager of the Fraud/Investigation strand for his/her agreement to proceed with a prosecution.

70. I confirm that I have considered the following documents:

- i) The Schedule of Non-Sensitive Unused Material dated 23 January 2009 at **[POL00050750]**;
- ii) The Schedule of Sensitive Material dated 23 January 2009 at **[POL00050751]**;
- iii) The Audit Record Query ("ARQ") dated 9 June 2009 at **[POL00051793]**;
- iv) The emails dated 22 June 2009 at **[FUJ00122608]**;
- v) The email from you to Andy Dunks, dated 23 June 2009 **[FUJ00152816]**;
- vi) The email from you to Andy Dunks, dated 24 June 2009 **[FUJ00152817]**;
- vii) The emails dated June and August 2009 at **[POL00052222]**;
- viii) The emails dated August 2009 at **[POL00107662]**;
- ix) The report of Charles McLachlan dated 21 September 2009 at **[POL00093689]** and the 2nd interim report of Charles McLachlan dated 19 November 2009 at **[POL00094101]** and the 3rd interim report of Charles McLachlan dated 3 February 2010 at **[POL00053992]**;
- x) The letter from Coomber Rich dated 1 October 2009 at **[POL00052487]** and the enclosed application for disclosure at **[POL00052462]** and further request for disclosure at **[POL00058503]**;
- xi) The email from me to Andy Dunks, dated 16 November 2009 **[FUJ00152838]**;

- xii) The email from me, dated 18 November 2009 [FUJ00152841];
- xiii) The email from me, dated 26 November 2009 at [FUJ00152843] and attachments at [POL00046162] and [FUJ00152845];
- xiv) The further request for disclosure, dated 30 November 2009 at [POL00124857];
- xv) The email from me dated 2 December 2009 at [FUJ00152851];
- xvi) The email from Penny Thomas, dated 17 December 2009 at [FUJ00152871];
- xvii) The email from me, dated 24 December 2009 at [FUJ00152876];
- xviii) Counsel's Advice dated 5 January 2010 at [POL00044557];
- xix) The letter from Jarnail Singh to Messrs Coomber Rich dated 11 January 2010 at [POL00053746];
- xx) The email from me, dated 27 January 2010 at [FUJ00152889] and attachment at [FUJ00122678];
- xxi) The letter from Jarnail Singh to Messrs Coomber Rich dated 27 January 2010 at [POL00044553];
- xxii) The email from me, dated 28 January 2010, at [FUJ00152897] (page 2);
- xxiii) The attendance note, dated 27 January 2010 at [POL00053849];
- xxiv) The letter to Messrs Coomber Rich dated 27 January 2010 at [POL00044553];
- xxv) My email dated 29 January 2010 at [POL00053880] and the audit report

dated 14 October 2005 at **[POL00093865]**;

xxvi) The attendance note dated 1 February 2010 at **[UKGI00014903]**;

xxvii) The email from me, dated 1 February 2010, at **[FUJ00152896]**;

xxviii) The email from me, dated 2 February 2010 at **[FUJ00152901]**;

xxix) The witness statement of Gareth Jenkins dated 2 February 2010 at
[POL00053937];

xxx) The email from Penny Thomas to me, dated 3 February 2010 at
[FUJ00152905];

xxxi) The email from me, dated 12 February 2010 at **[FUJ00154881]**;

xxxii) The ARQ Request, dated 26 February 2010 at **[FUJ00155189]**;

xxxiii) The notice of additional evidence and attached witness statements
dated 26 February 2010 at **[POL00058450]**;

xxxiv) The email from me, dated 1 March 2010 at **[FUJ00153007]**;

xxxv) The email dated 1 March 2010 at **[POL00054267]** (and what appear
to be the attachments – the 4th and 5th Interim Technical Expert's
reports prepared by Charles McLachlan - at **[POL00054126]** and
[POL00054257]);

xxxvi) The email from Penny Thomas to me, dated 5 March 2010 at
[FUJ00153029];

xxxvii) The email from me to Penny Thomas, dated 9 March 2010 at
[FUJ00153039];

xxxviii) The notice of additional evidence and attached witness
statements dated 18 March 2010 at **[POL00058440]**;

- xxxix) The email from Jarnail Singh to me, dated 6 April 2010 at **[POL00054557]**;
- xl) The email from Penny Thomas, dated 6 April 2010 at **[FUJ00153068]**;
- xli) The email from Penny Thomas, dated 8 April 2010 at **[FUJ00153073]**;
- xlii) The email from me, dated 8 April 2010 at **[FUJ00153074]** (at page 2);
- xliii) The email from me, dated 9 April 2010 at **[FUJ00153075]**;
- xliv) The email from me to Gareth Jenkins, dated 6 May 2010 at **[FUJ00153094]**;
- xlv) Gareth Jenkins' witness statement dated 8 July 2010 at **[FUJ00122906]**;
- xlvi) The email from you to the Fraud team, dated 14 July 2009 at **[FUJ00152818]**;
- xlvii) The email from Jarnail Singh to John Longman, dated 15 July 2010 at **[FUJ00153131]** (page 4);
- xlviii) The email from me to Penny Thomas, dated 15 July 2010 at **[FUJ00153132]** (page 2);
- xlix) The email from Penny Thomas to me, dated 27 July 2010 at **[FUJ00153159]**;
- l) The email from me, dated 27 July 2010 at **[UKGI00014898]**;
- li) The email from me, dated 20 August 2010 at

[FUJ00153230];

lii) The Schedule of Non-Sensitive Unused Material dated 8 September 2010 at **[POL00055217]** (the covering letter from Rob Wilson sending this to the Defence is dated 15 September 2010 and is at **[POL00055236]**);

liii) The email from Andy Bayfield to me, dated 9 September 2010 at **[FUJ00153279]**;

liv) The email from you, dated 15 September 2010 at **[POL00093841]**;

lv) The email from Marilyn Benjamin, dated 4 October 2010, at **[FUJ00153345]**;

lvi) The report of Charles McLachlan dated 4 October 2010 at **[FUJ00083736]**;

lvii) The email from me to Gareth Jenkins, dated 6 October 2010, at **[FUJ00153358]** and the attachments at **[FUJ00153359]**, **[FUJ00153360]**, **[FUJ00153361]**, **[FUJ00153362]**, **[FUJ00153363]**, **[FUJ00153364]** and **[FUJ00153365]**;

lviii) The emails between Warwick Tatford and Gareth Jenkins, dated October 2010, at **[FUJ00153368]**;

lix) The email from me to Warwick Tatford and Jarnail Singh, dated 7 October 2010, at **[FUJ00153371]** and **[FUJ00154958]**;

lx) The emails with Gareth Jenkins, dated October 2010 at **[FUJ00224966]**;

- ixi) The emails with Gareth Jenkins, dated 8 October 2010 at [FUJ00224967] and attachments at [FUJ00224968], [FUJ00224969], [FUJ00224970], [FUJ00224971];
- ixii) The draft statement of Gareth Jenkins at [POL00110275];
- ixiii) The addendum report from Charles McLachlan dated 11 October 2010 at [POL00030298];
- ixiv) The Joint Statement to the Court by Gareth Jenkins and Charles McLachlan dated 11 October 2010 at [POL00001882];
- ixv) The email from Gareth Jenkins to Charles MacLachlan, dated 11 October 2010 at [FUJ00153390];
- ixvi) The email from me, dated 11 November 2010 at [FUJ00153425].

71. As indicated by the schedules of material signed off by me at [POL00050750] and [POL00050751], it is clear that I gathered and organised the necessary disclosure schedules for the committal bundle in this matter, which I can only assume means that I was the Disclosure Officer. However, I would like to point out to the Inquiry that I did not realise at the time that I had this official title. I would have provided the committal bundle, copies of witness statements, copies of exhibits and disclosure schedules to the POL Legal Team to review and they would have dealt with providing disclosure to the defence team. I would not have had any involvement in providing disclosure to the defence team.

72. Once the defence had attributed the shortfall discovered to a problem with the Horizon system, ARQ data was then requested in the case of Ms Seema Misra. The emails at [FUJ00153007] indicate that data for the period 1st December 2006 to 31st December 2007 was retrieved from the Horizon system, and I made the request for this data based on advice from the POL Legal Team.

73. I believe I was the only person responsible for collating disclosure for the committal bundle in this matter and it was me who actioned all further disclosure request made by the defence to the relevant departments. The documents produced to me in relation to the case of Seema Misra confirm this. As explained above, some requested disclosure was provided and some was not. If requests were not forthcoming then I would have reported this back to the POL Legal Team for advice. I don't have a view on the merits of the disclosure requested.

74. It is my understanding that that the amount of ARQ requests that the defence wanted was deemed excessive as the defence wanted to see around 3 years' worth of data – I requested this data but as seen in the email from Dave Posnett in the chain at [POL00107662], there were concerns held in relation to how much of the POL's data request quota would be used up. I cannot recall my reaction to this email from Dave Posnett. From hindsight I imagine I would have thought it was a larger than usual request as I was aware that POL had a contract with Fujitsu where only a certain number of ARQ requests would be provided without further costs being incurred by POL. As you can see in the email chain, I simply referred to the Legal Team for advice.

75. I cannot recall how Penny Thomas' involvement came about in the case of Seema Misra, but I do recall that she provided ARQ data together with a witness statement. Gareth Jenkins became involved so that he could produce a witness statement in response to the defence expert's report and be called to give evidence in relation to the integrity of Horizon. My understanding is that Penny Thomas was more junior to Gareth Jenkins in that she carried out more of the administrative roles for Fujitsu. For example, she was the key point of contact to request ARQ data when required and her statements would provide an account about the provision of such data requests in cases. I believe that Gareth on the other hand would not have dealt with these administrative matters. I understood him to be a Senior Manager within Fujitsu as he provided more technical witness evidence on issues raised about the Horizon system. In the case of Seema Misra I was asked to go to the Fujitsu Head Office (which I believe was near Maidenhead) to take a witness statement from Gareth Jenkins. I cannot remember who asked me to go and take this statement – I imagine it was the Legal Team. When I arrived Gareth told me to leave it with him and that he would produce a written statement and send it over. I vaguely recall further down the line going to a meeting at Chambers. Document [FUJ00153368] suggests that the meeting took place on the 5th October 2010 and that Gareth Jenkins, Jarnail Singh, Warwick Tatford and myself were the attendees. I cannot recall if anybody else was present.

76. I cannot recall giving any direct instructions to Mr Jenkins. I imagine his instructions came from the POL Legal Team and Counsel, Warwick Tatford. As

stated above, I was asked to go and take a statement from Mr Jenkins, but in the end he produced it himself. I am sure that I probably read through Mr Jenkins' statement once provided, but I cannot recall having any views on it, nor providing any comments on it. I think it would have been Counsel who would have reviewed and critiqued Mr Jenkins' statement. The email chain at [FUJ00153371] seems to indicate this as it shows Warwick emailing Mr Jenkins on 7 October 2012 which says *"Please find attached your draft with my comments in red."* Mr Jenkins then replies to Warwick on the same day and says *"Thanks for the feedback. I'll try and amend as suggested once I've finished my further analysis."*

77. The emails produced to me in relation to this prosecution do refer to Mr Jenkins as being an expert witness in this case, examples being [FUJ00152871], [FUJ00152889], [FUJ 00152897] etc. As he was referred to by others as an expert then I would have considered him to be one. I am unaware of what the difference would have been between an expert or lay witness. I do not recall any information that was given to him by me in relation to the role of an expert witness and the duties he owed to the court if he was an expert witness. I don't think it would have been my role to give him this information. I am not sure who would have had that role.

78. I cannot recall anyone from Fujitsu or POL explaining to me that there were bugs, errors or defects in the Horizon system that would make the system unreliable, during the Seema Misra case or at any other time. I always thought the system functioned correctly. Had I been told otherwise I would have raised my concerns during an investigation.

79. I cannot recall whether Mr Jenkins expressed any views in relation to the disclosure being sought by the Defence and the relevance of the material sought to the case.

80. I confirm that I have considered the document [FUJ00153132] which refers to the duplication of the ARQ records found in this matter. I had no understanding about the duplication of the ARQ records other than it was said to have had no bearing on the accuracy of the Horizon data. As such, I do not think I would have held a view as to the impact of this had on the case.

81. I have reviewed the attendance note at [POL00053849] dated 27 January 2010 and the comment within it that states "*Jon Longman has been chased on Horizon but this has not been in hand at the moment*". Unfortunately due to the passage of time I cannot recall what this is in reference to. I can only assume that I was still waiting for some information I had requested from Fujitsu, but I cannot say this for certain.

82. I cannot provide an account from direct memory of the requests for access made by the Defence on 22 July 2010 and the response provided by POL, Therefore I am relying entirely on the documents produced to me with the Request. Document [UKGI00014898] illustrates that I requested the said information sought by the defence but this seems to have been deemed unnecessary by Chesterfield and the POL Legal Team. It appears that I was told that the Defence would have to make a Section 8 application to the court for this information. I do

not think I was entirely sure what a section 8 application was, I was simply following the advice given to me.

83. I cannot recall what criminal enforcement proceedings were taken against Ms Seema Misra. As explained above, Recovery of losses faced by the POL as result of crime committed by an SPM was something that Financial Investigators in the Security Team dealt with.

84. Other than my involvement described above, I had no further involvement in the prosecution of Ms Seem Misra. I believe that by the time sentencing took place, Adrian Morris had returned to work and he attended the sentencing hearing.

85. I have considered [POL00055759] and [POL00055590]. Unfortunately I cannot recall what my view of the outcome of this case was at the time.

86. I have reviewed the Judgment of the Court of Appeal in Josephine Hamilton & Others v Post Office Limited [2021 EWCA Crim 577 at [POL00113278]. Upon reflection on this case, I do not think that I would have done anything differently. The initial investigation and interview under caution where I assisted was all carried out in accordance with PACE and I believe we acted in accordance with how we had been trained to conduct investigations. Following my review of the offender report completed by Mr Morris during the initial investigation, it all seems compliant.

87. The record of interview with Ms Misra illustrates that she had admitted to entering incorrect data on to the Horizon system (which is false accounting) and she explains that there had been theft committed at the branch by past employees. A year had gone by before any issues were raised by Ms Misra's Defence team in relation to the integrity of the Horizon system – had any issues in relation to the reliability and integrity of the Horizon System been raised from the outset then I believe the direction of the investigation would have been different. I believe that it would have been a concern and a line of Inquiry that needed to be addressed before any decision in relation to charges and whether to prosecute was reached by the Legal Team.

Prosecution of Julian Wilson

88. I confirm that I have reviewed the following documents in relation to this case:

- i) The audit report, dated 11 September 2008 at [POL00050062];
- ii) The record of the interview at [POL00044804] and [POL00050138];
- iii) The stakeholder notification at [POL00047065];
- iv) The suspect offender report at [POL00044695];
- v) The investigation report at [POL00044692];
- vi) The case closure report at [POL00065047].

89. I would like to flag to the Inquiry that I played no role the initial investigation or the criminal proceedings that followed against Mr Julian Wilson. From a review of the documents provided to me in, I can see that this matter was allocated to Gary

Thomas and Graham Brander, who were other Investigators within the Security Team.

90. I have also reviewed the following documents:

- i) The emails from me and various individuals at Fujitsu at **[FUJ00155018]**, **[FUJ00155021]**, **[FUJ00155050]**;
- ii) The email from Pat Davies, dated 31 August 2011 at **[POL00114736]**;
- iii) The email from Pat Davies, dated 1 September 2011 at **[POL00114717]** and **[POL00114722]**;
- iv) The email from Pat Davies, dated 5 September 2011 at **[POL00114697]**;
- v) The email from Pat Davies, dated 9 September 2011 at **[POL00114706]**;
- vi) The email from Penny Thomas, dated 15 September 2011 at **[FUJ00225264]**;
- vii) The email from me to Penny Thomas at 28 September 2011 at **[FUJ00155051]**;
- viii) The email from me at **[FUJ00155070]** (page 1);
- ix) The email from me, dated 27 October 2011 at **[POL00114698]**.

91. It appears that after the conviction of Julian Wilson was already obtained, I was called to a meeting with solicitors dealing with the enforcement proceedings and I was asked if I could obtain ARQ data costings from Fujitsu where SPMs were not repaying money to POL for the loss suffered. I think that the reason they were

not paying back the losses was because they were attributing the losses to issues with the Horizon IT system. I believe the ARQ data was requested by their defence teams. In total there were four Post Offices for which ARQ data costings were requested. They were, Alderley Edge, Astwood Bank, Hockley and Splott Road.

92. I cannot recall that I was aware of any allegations made by Mr Wilson about the reliability of the Horizon IT system until I was requested to deal with defence disclosure requests relating to ARQ data, as described above. I cannot recall who or why I was asked in particular to assist with obtaining these Defence data requests. All I can say is that the above emails illustrate me making those requests to Fujitsu, so I was clearly asked to do this

93. I cannot recall who was present at the meeting I had with solicitors, nor what was discussed. I can only rely on what I have included in my email at **[FUJ00155051]**. I have been asked to explain what I meant when I said in this email that the feeling from the meeting was that a lot of the requests for information were unnecessary and should be challenged. I cannot recall directly what I meant by this and I do not know who raised this concern in particular. I can only assume that the concern related to the fact the requests being made by the Defence were large and as explained above, POL had a contract with Fujitsu where only a certain number of ARQ requests would be provided without further costs being incurred by POL.

94. I do not know who made the decision to request an undertaking from Defence solicitors to pay the costs of retrieving data from Fujitsu and cannot recall what my view was of this.

95. I confirm that I have reviewed [FUJ00225264]. It is clear from my emails in this chain that I was asked to obtain further horizon data, but I needed to get a costing estimate for such information. I cannot recall being aware of any of the email discussions in the chain after my initial two. The remainder of the emails appear to be internal ones between Fujitsu employees. I cannot recall if I was made aware by Fujitsu employees of the concerns being discussed in such emails.

96. Other than my minimal involvement post-conviction (as described above) I had no further involvement in the case of Julian Wilson.

General

97. At the time, I do not believe that I considered a challenge to the Horizon system in one case to be relevant to other cases. As explained earlier in this statement, it was never confirmed to me that there was a definite fault with the Horizon System. As such, I was under the impression that the system was operating as expected.

98. Other than the matters referred to above, I do not wish to bring any other matters to the attention of the Chair of the Inquiry.

Statement of truth

I believe the content of this statement to be true

Signed:

GRO

Dated: 08 November 2023

GRO

Index to First Witness Statement of Jonathan Longman

| No | URN | Document Description | Control Number |
|-----------|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
| 1. | POL00126360 | Curriculum Vitae of Jon Longman | POL-0132918 |
| 2. | POL00104747 | Investigation Policy: Casework Management (England & Wales) v1.0 | POL-0080387 |
| 3. | POL00104777 | Casework Management Policy version 4.0, October 2002 | POL-0080417 |
| 4. | POL00104754 | Rules and Standards Policy (version 2.0, October 2000) | POL-0080394 |
| 5. | POL00030687 | Investigation Policy - Investigation Procedures v2 January 2001 | POL-0027169 |
| 6. | POL00104762 | Disclosure Of Unused Material, Criminal Procedures and Investigations Act 1996 Codes of Practice Policy (version 1.0, May 2001) | POL-0080402 |
| 7. | POL00030578 | Royal Mail Group Ltd Criminal Investigation and Prosecution Policy", 1 December 2007 | POL-0027060 |
| 8. | POL00104812 | "Royal Mail Group Ltd Criminal Investigation and Prosecution Policy", 1 December 2007 | POL-0080444 |
| 9. | POL00104806 | "Royal Mail Group Security - Procedures & Standards - Standards of Behaviour and Complaints Procedure" , Version 2, October 2007 | POL-0080438 |
| 10. | POL00031003 | "Royal Mail Group Crime and Investigation Policy", Version 1.1, October 2009 | POL-0027485 |
| 11. | POL00030580 | "Post Office Ltd - Security Policy - Fraud Investigation and Prosecution Policy" (version 2, 4 April 2010) | POL-0027062 |
| 12. | POL00030579 | "Post Office Ltd Financial Investigation Policy" (4 May 2010) | POL-0027061 |
| 13. | POL00104848 | Royal Mail Group Security – Procedures & Standards: “Appendix 1 to P&S 9.5 Disclosure of Unused Material & The Criminal Procedure & Investigations Act 1996” (Version 1, July 2010) | POL-0080480 |
| 14. | POL00104837 | Royal Mail Group Security – Procedures & Standards: “Committal & Summary | POL-0080469 |

| | | | |
|-----|-------------|----------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| | | Trial Papers & Processes" (Version 1, July 2010) | |
| 15. | POL00026573 | "Royal Mail Group Security - Procedures & Standards - The Proceeds of Crime Act 2002 & Financial Investigations" (version 1, September 2010) | POL-0023214 |
| 16. | POL00104857 | "Royal Mail Group Security - Procedures & Standards - Initiating Investigations" (September 2010) | POL-0080489 |
| 17. | POL00031008 | "Royal Mail Group Ltd Criminal Investigation and Prosecution Policy" (version 1.1, November 2010) | POL-0027490 |
| 18. | POL00104853 | Post Office Ltd Financial Investigation Policy (version 2, February 2011) | POL-0080485 |
| 19. | POL00104855 | Post Office Ltd Anti-Fraud Policy (February 2011) | POL-0080487 |
| 20. | POL00030786 | "Royal Mail Group Policy Crime and Investigation S2" (version 3.0, April 2011) | POL-0027268 |
| 21. | POL00105229 | "Post Office Ltd PNC Security Operating Procedures" (August 2012) | POL-0080854 |
| 22. | POL00104929 | Post Office Limited: Internal Protocol for Criminal Investigation and Enforcement (with flowchart)", (October 2012) | POL-0080561 |
| 23. | POL00105226 | "Undated Appendix 1 - POL Criminal Investigations and Enforcement Procedure (flowchart)", (October 2012) | POL-0080851 |
| 24. | POL00104968 | Undated document entitled "POL – Enforcement & Prosecution Policy" | POL-0080600 |
| 25. | POL00030602 | "Post Office Limited: Criminal Enforcement and Prosecution Policy" (undated) | POL-0027084 |
| 26. | POL00031005 | "Conduct of Criminal Investigations Policy" (version 0.2, 29 August 2013) | POL-0027487 |
| 27. | POL00027863 | "Conduct of Criminal Investigations Policy" (version 3, 10 February 2014) | POL-0024504 |
| 28. | POL00030902 | "Conduct of Criminal Investigations Policy" (September 2018) | POL-0027384 |
| 29. | POL00104821 | "Condensed Guide for Audit Attendance" (version 2, October 2008) | POL-0080453 |
| 30. | POL00118096 | Dave Posnett's email dated 23 May 2011 | VIS00012685 |

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| 31. | POL00118108 | Appendix 1 - Case Compliance checklist | VIS00012697 |
| 32. | POL00118109 | Appendix 2 - File construction and Appendixes A, B and C: "Compliance Guide: Preparation and Layout of Investigation Red Label Case Files" | VIS00012698 |
| 33. | POL00118101 | Appendix 3 - Offender reports and Discipline reports: "Compliance Guide to the Preparation and Layout of Investigation Red Label Case Files" | VIS00012690 |
| 34. | POL00118102 | Appendix 4 - Offender reports layout: "POL template Offender Report (Legal Investigation)" | VIS00012691 |
| 35. | POL00118103 | Appendix 5 - Discipline reports layout: "POL template Offender Report (Personnel Investigation)" | VIS00012692 |
| 36. | POL00118104 | Appendix 6 - Identification codes | VIS00012693 |
| 37. | POL00118105 | Appendix 7 - Tape Interviews. "POL Security Operations Team guide: Summarising of Tape Recorded Interviews." | VIS00012694 |
| 38. | POL00118106 | Appendix 8 - Notebooks: Guidance on using notebooks in investigations | VIS00012695 |
| 39. | POL00118107 | Appendix 9 - Case Progression Toolkit. | VIS00012696 |
| 40. | POL00121772 | Email chain from Dave Pardoe to Allison Drake, Andrew Wise, Dave Posnett and others Re: FW: Project Golden - process/issues arising from security training | POL-0128032 |
| 41. | POL00121773 | Appendix 4 - Offender reports layout: "POL template Offender Report (Legal Investigation)" | POL-0128033 |
| 42. | POL00058550 | The Audit Report dated 16 January 2008 | POL-0055029 |
| 43. | POL00119329 | Record of Tape Recorded Interview of Seema Misra - Tape Reference Number: 060341 | POL-0119248 |
| 44. | POL00119330 | Record of Tape Recorded interview of Seema Misra -Tape ref: 060342 - Interviewing officer Adrian Morris and John Longman | POL-0119249 |
| 45. | POL00044541 | POL Investigation Report for Seema Misra (POLTD/0708/ 0249) | POL-0041020 |

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| 46. | POL00049658 | Memo from Jarnail Singh to Investigation Team Post Office Limited and Adrian Morris re Post Office Limited v Seema Misra. POLTD/0708/0249. Opinion that there is sufficient evidence to prosecute, and in the Crown Court. | POL-0046137 |
| 47. | POL00049716 | Email from Jason G Collins to Jarnail A Singh re: DAM Authority Seema Misra West Byfleet | POL-0046195 |
| 48. | POL00049717 | Email from Jarnail Singh dated 21 April 2008 | POL-0046196 |
| 49. | POL00044539 | Memo from Jarnail Singh to the Fraud Team dated 18 November 2008 | POL-0041018 |
| 50. | POL00045010 | Schedule of Charges against Seema Misra | POL-0041489 |
| 51. | POL00044613 | Summary of facts (POL v Seema Misra) | POL-0041092 |
| 52. | POL00051149 | Signed indictment | POL-0047628 |
| 53. | POL00045495 | Witness statements of John Longman, dated 6 January 2009 | POL-0041974 |
| 54. | POL00054041 | Witness statements of John Longman, dated February 2010 | POL-0050520 |
| 55. | POL00055530 | Witness statements of John Longman, dated 12 October 2010 | POL-0052009 |
| 56. | POL00119335 | Seema Misra Case Study: Email chain from Phil Taylor to Fraud Team and John Longman. Re: Regina v Seema Misra Guildford Crown Court Trial between the dates of 1 - 12 June 2009 | POL-0119254 |
| 57. | POL00119281 | POL Financial Investigation Events Log for Case Number POLTD/0708/0249 (West Byfleet Branch - Seema Misra) | POL-0119200 |
| 58. | UKGI00014845 | Transcript of John Longman's evidence | UKGI025638-001 |
| 59. | POL00050750 | Schedule of Non-Sensitive Unused Material dated 23 January 2009 | POL-0047229 |
| 60. | POL00050751 | Schedule of Sensitive Material dated 23 January 2009 | POL-0047230 |
| 61. | POL00051793 | Audit Record Query ("ARQ") dated 9 June 2009 | POL-0048272 |
| 62. | FUJ00122608 | Email from Dave Posnett to Andy Dunks re: WS for West Byfleet HSH calls | POINQ0128822F |
| 63. | FUJ00152816 | Email from Andy Dunks to John Longman re WS for West Byfleet HSH calls. | POINQ0159011F |

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| 64. | FUJ00152817 | Email to Andy Dunks, dated 24 June 2009 | POINQ0159012F |
| 65. | POL00052222 | Emails dated June and August 2009 | POL-0048701 |
| 66. | POL00107662 | Emails dated August 2009 | POL-0105957 |
| 67. | POL00093689 | Report of Charles McLachlan dated 21 September 2009 | POL-0093811 |
| 68. | POL00094101 | 2 nd Interim report of Charles McLachlan dated 19 November 2009 | POL-0094223 |
| 69. | POL00053992 | 3 rd Interim report of Charles McLachlan dated 3 February 2010 | POL-0050471 |
| 70. | POL00052487 | Letter from Coomber Rich dated 1 October 2009 | POL-0048966 |
| 71. | POL00052462 | Application by the defence pursuant to s8 of the criminal procedure and investigations act for disclosure of relevant material | POL-0048941 |
| 72. | POL00058503 | Email from Warwick Tafford to John Longman, Re: Misra further disclosure request from the defence. | POL-0054982 |
| 73. | FUJ00152838 | Email from Andy Dunks to Leighton Machin Re WS for West Byfleet - Additional Information Requested | POINQ0159033F |
| 74. | FUJ00152841 | Email from Andy Dunks to Tom Lillywhite, cc'ing Penny Thomas, re Trial of Seema Misra - Guildford Crown Court W/C 30th November 2009 | POINQ0159036F |
| 75. | FUJ00152843 | Email from John Longman to Jane Owen cc Andy Dunks re Seema Misra Trial (West Byfleet PO) - Interim technical expert's report and request from the defence regarding hardware installed at West Byfleet | POINQ0159038F |
| 76. | POL00046162 | 2nd Interim Technical expert's report to the Court prepared by Charles Alastair McLachlan, a Director of Amsphere Consulting Ltd - R v Seema Misra | POL-0042641 |
| 77. | FUJ00152845 | Card Information Flow Overview RePOS/EFT - Misra - Electronic Funds Transfer PCI Schedule | POINQ0159040F |
| 78. | POL00124857 | Further Request for Disclosure from Issy Hogg to Phil Taylor, dated 30 November 2009 | POL-0131691 |
| 79. | FUJ00152851 | Email from Jane Owen to Penny Thomas re Seema Misra West Byfleet branch, dated 2 December 2009 | POINQ0159046F |

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| 80. | FUJ00152871 | Email from Penny Thomas to Jane Owen re Seema Misra trial - Guildford Crown Court., dated 17 December 2009 | POINQ0159066F |
| 81. | FUJ00152876 | Email re Regina V Seema Misra, dated 24 December 2009 | POINQ0159071F |
| 82. | POL00044557 | Counsel's Advice dated 5 January 2010 | POL-0041036 |
| 83. | POL00053746 | letter from Jarnail Singh to Messrs Coomber Rich dated 11 January 2010 | POL-0050225 |
| 84. | FUJ00152889 | Email from Thomas Penny to Gareth Jenkins attaching expert report in case of Seema Misra, dated 27 January 2010 | POINQ0159084F |
| 85. | FUJ00122678  | Seema Misra's case study: 2nd Interim Technical expert's report to the Court prepared by Charles Alastair McLachlan, a Director of Amsphere Consulting Ltd. | POINQ0128892F |
| 86. | POL00044553 | Letter from Jarnail Singh to Messrs Coomber Rich dated 27 January 2010 | POL-0041032 |
| 87. | FUJ00152897 | Email from Thomas Pnny to Tom Lillywhite and Gareth Jenkins re West Byfleet Issues, dated 28 January 2010, | POINQ0159092F |
| 88. | POL00053849 | Attendance note, dated 27 January 2010 | POL-0050328 |
| 89. | POL00053880 | Email re West Byfleet- Latest Defence Request for Disclosure dated 29 January 2010 | POL-0050359 |
| 90. | POL00093865 | Audit report dated 14 October 2005 | POL-0093987 |
| 91. | UKGI00014903 | Attendance note dated 1 February 2010 | UKGI025696-001 |
| 92. | FUJ00152896 | Email dated 1 February 2010. | POINQ0159091F |
| 93. | FUJ00152901 | Email dated 2 February 2010 | POINQ0159096F |
| 94. | POL00053937 | Witness statement of Gareth Jenkins dated 2 February 2010 at | POL-0050416 |
| 95. | FUJ00152905 | Email from Penny Thomas to you, dated 3 February 2010 | POINQ0159100F |

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| 96. | FUJ00154881 | Email re West Byfleet- Horizon Service Helpdesk Calls dated 12 February 2010 | POINQ0161076F |
| 97. | FUJ00155189 | ARQ Request, dated 26 February 2010 | POINQ0161384F |
| 98. | POL00058450 | Notice of additional evidence and attached witness statements dated 26 February 2010 | POL-0054929 |
| 99. | FUJ00153007 | Email re West Byfleet- 162023, dated 1 March 2010 | POINQ0159202F |
| 100. | POL00054267 | Memo from Jarnail A Singh to Gareth Jenkins re. Regina v Seema Misra Guildford Crown Court Trial - 15th March 2010 | POL-0050746 |
| 101. | POL00054126 | Attachment – the 4th Interim Technical Expert's reports prepared by Charles McLachlan | POL-0050605 |
| 102. | POL00054257 | Attachment – the 5th Interim Technical Expert's reports prepared by Charles McLachlan | POL-0050736 |
| 103. | FUJ00153029 | Email chain from Penny Thomas to John Longman cc Jane M Owen re: REGINA v SEEMA MISRA GUILDFORD CROWN COURT TRIAL - 15TH MARCH 2010 | POINQ0159224F |
| 104. | FUJ00153039 | Email to Penny Thomas re West Byfleet (126023)- Witness Statement from Fujitsu, dated 9 March 2010 | POINQ0159234F |
| 105. | POL00058440 | The notice of additional evidence and attached witness statements dated 18 March 2010 | POL-0054919 |
| 106. | POL00054557 | Email from Jarnail Singh re Mrs Seema Misra - POLtd 0708/0249, dated 6 April 2010 | POL-0051036 |
| 107. | FUJ00153068 | Email from Penny Thomas re West Byfleet- 126023- Witness statement from Ian Venables, dated 6 April 2010 | POINQ0159263F |
| 108. | FUJ00153073 | Email from Penny Thomas re West Byfleet: Seema Misra Case Study, dated 8 April 2010 | POINQ0159268F |
| 109. | FUJ00153074 | Email from Thomas Penny to Ian Venables re West Byfleet – 126023, dated 8 April 2010 | POINQ0159269F |
| 110. | FUJ00153075 | Email re West Byfleet- Trial of Seema Misra, dated 9 April 2010 | POINQ0159270F |
| 111. | FUJ00153094 | Seema Misra Criminal Case Study: Email with attachment from Gareth | POINQ0159289F |

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| | | Jenkins to Penny Thomas re: Transaction Errors West-Byfleet | |
| 112. | FUJ00122906 | Gareth Jenkins' witness statement dated 8 July 2010 | POINQ0129120F |
| 113. | FUJ00152818 | Email to the Fraud team, dated 14 July 2009 | POINQ0159013F |
| 114. | FUJ00153131 | Email re Regina v Seema Misra- Experts, dated 15 July 2010 | POINQ0159326F |
| 115. | FUJ00153132 | Email re Duplication of Transaction Records in ARQ Returns, dated 15 July 2010 | POINQ0159327F |
| 116. | FUJ00153159 | Email from Penny Thomas re requests following experts meeting- R V Seema Misra, dated 27 July 2010 | POINQ0159354F |
| 117. | UKGI00014898 | Email re Seema Misra Case Study, dated 27 July 2010 | UKGI025691-001 |
| 118. | FUJ00153230 | Email re Seema Misra Trial, dated 20 August 2010 | POINQ0159425F |
| 119. | POL00055217 | Schedule of Non-Sensitive Unused Material dated 8 September 2010 | POL-0051696 |
| 120. | POL00055236 | Covering letter from Rob Wilson sending this to the Defence is, dated 15 September 2010 | POL-0051715 |
| 121. | FUJ00153279 | Email from Andy Bayfield re West Byfleet- Trial date- 11 October 2010, dated 9 September 2010 | POINQ0159474F |
| 122. | POL00093841 | Email re West Byfleet- Seema Misra, dated 15 September 2010 | POL-0093963 |
| 123. | FUJ00153345 | Email from Marilyn Benjamin, dated 4 October 2010 | POINQ0159540F |
| 124. | FUJ00083736 | Report of Charles McLachlan dated 4 October 2010 | POINQ0089907F |
| 125. | FUJ00153358 | Email to Gareth Jenkins, dated 6 October 2010 | POINQ0159553F |
| 126. | FUJ00153359 | Seema Misra Criminal Case Study: Final Branch Statement from 11/10/2006 - 21/11/2006 at West Byfleet PO branch | POINQ0159554F |
| 127. | FUJ00153360 | Seema Misra Criminal Case Study: Final Branch Trading Statement from 12/07/2006 - 18/08/2006 | POINQ0159555F |
| 128. | FUJ00153361 | Final Branch Trading Statement for West Byfleet branch (1260235) for period 10/1/2007 to 13/02/2007 | POINQ0159556F |

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| 129. | FUJ00153362 | Final Branch Trading Statement | POINQ0159557F |
| 130. | FUJ00153363 | Final Branch Trading Statement | POINQ0159558F |
| 131. | FUJ00153364 | Final Branch Trading Statement | POINQ0159559F |
| 132. | FUJ00153365 | Seema Misra Criminal Case Study - Final Branch Trading Statement for West Byfleet | POINQ0159560F |
| 133. | FUJ00153368 | Emails between between Warwick Tatford and Gareth Jenkins, dated October 2010 | POINQ0159563F |
| 134. | FUJ00153371 | Emails to Warwick Tatford and Jarnail Singh, dated 7 October 2010 | POINQ0159566F |
| 135. | FUJ00154958 | Seema Misra case study: Email from Wariwick tatford to Gareth Jenkins re: Draft Witness Statement | POINQ0161153F |
| 136. | FUJ00224966 | Emails with Gareth Jenkins, dated October 2010 | POINQ0231081F |
| 137. | FUJ00224967 | Emails with Gareth Jenkins re Witness Statement v3, dated 8 October 2010 | POINQ0231082F |
| 138. | FUJ00224968 | Table showing Total value of Transactions that can potentially be associated with Transaction Corrections with further comments from Gareth Jenkins | POINQ0231083F |
| 139. | FUJ00224969 | Fujitsu Services - Horizon Office Platform Service Style Guide - Desktop Layout - (Version 10.0) | POINQ0231084F |
| 140. | FUJ00224970 | Fujitsu Services - Hoirzon Office Platform Service Style Guide Desktop Components - (Version 10.0) | POINQ0231085F |
| 141. | FUJ00224971 | Fujitsu Services - Horizon Office Platform Service Style Guide Human Computer Interface Specification - (Version 10.0) | POINQ0231086F |
| 142. | POL00110275 | Witness Statement of Gareth Idris Jenkins@Version 3.0 11/02 | POL-0108082 |
| 143. | POL00030298 | Addendum report from Charles McLachlan dated 11 October 2010 | POL-0026780 |
| 144. | POL00001882 | Joint Statement to the Court by Gareth Jenkins and Charles McLachlan dated 11 October 2010 | VIS00002896 |
| 145. | FUJ00153390 | Email from Gareth Jenkins to Charles MacLachlan, dated 11 October 2010 | POINQ0159585F |

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| 146. | FUJ00153425 | Email re sentencing of Seema Misra, dated 11 November 2010 | POINQ0159620F |
| 147. | POL00055100 | Emails between John Longman, Jarnail A Singh and others, re. Regina V Seema Misra - Guilford Crown Court - Trial | POL-0051579 |
| 148. | POL00055150 | Email to Jarnail A Singh, Re: West Byfleet-Misra | POL-0051629 |
| 149. | POL00055146 | Letter from Jamail Singh Re: Regina v Seema Misra Guildford Crown Court Trial Case No: POLTD/07/08/0249 | POL-0051625 |
| 150. | POL00055759 | Memo re Regina v Seema Misra Case No: POLTD/0708/0249 | POL-0052238 |
| 151. | POL00055590 | Email from Marilyn Benjamin on behalf of Jarnail A Singh to Mandy Talbot, Hugh Flemington, Jacqueline Whitham, Re: Regina v Seema Misra-Guildford Crown Court-Trial-Attack on Horizon | POL-0052069 |
| 152. | POL00113278 | Judgment of the Court of Appeal in Josephine Hamilton & Others v Post Office Limited [2021 EWCA Crim 577 | POL-0110657 |
| 153. | POL00050062 | Audit report, dated 11 September 2008 | POL-0046541 |
| 154. | POL00044804 | Royal Mail Record of Tape Recorded Interview with Julian Wilson | POL-0041283 |
| 155. | POL00050138 | Julian Wilson Case Study: Royal Mail Group "Record of Tape Recorded Interview" of Julian Wilson transcript. | POL-0046617 |
| 156. | POL00047065 | Julian Wilson: Email from Gary R Thomas to Glenn Chester and Graham Brander re: Stakeholder Notification | POL-0043544 |
| 157. | POL00044695 | Email from Gary Thomas to Graham Brander re: Offender Reporting (Report for Mr Julian Wilson) | POL-0041174 |
| 158. | POL00044692 | Post Office Ltd investigation report for Julian Wilson (Astwood Bank office) | POL-0041171 |
| 159. | POL00065047 | Case closure report | POL-0061526 |
| 160. | FUJ00155018 | Email to Penny Thomas re: FW: Horizon Integrity Challenges - Alderley Edge Post Office (Scott Darlington) & Astwood Bank Post Office (Julian Wilson) | POINQ0161213F |
| 161. | FUJ00155021 | Email to Penny Thomas re: FW: Horizon Integrity Challenges - Alderley Edge Post Office (Scott Darlington) & | POINQ0161216F |

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| | | Astwood Bank Post Office (Julian Wilson) | |
| 162. | FUJ00155050 | Email from Jane M Owen to Penny Thomas, including John Longman and CC'ing Jason G Collins (on separate emails), re Horizon Integrity Challenges - Alderley Edge Post Office (Scott Darlington) & Astwood Bank Post Office (Julian Wilson) | POINQ0161245F |
| 163. | POL00114736 | Email from Pat Davies, dated 31 August 2011 | POL-0113837 |
| 164. | POL00114717 | Email from Pat Davies, dated 1 September 2011 | POL-0113818 |
| 165. | POL00114722 | Email from Pat Davies, dated 1 September 2011 | POL-0113823 |
| 166. | POL00114697 | Email from Pat Davies, dated 5 September 2011 | POL-0113798 |
| 167. | POL00114706 | Email from Pat Davies, dated 9 September 2011 | POL-0113807 |
| 168. | FUJ00225264 | Email from Penny Thomas, dated 15 September 2011 | POINQ0231381F |
| 169. | FUJ00155051 | Email to Penny Thomas at 28 September 2011 at | POINQ0161246F |
| 170. | FUJ00155070 | Karen Wilson Case Study - Email chain from Jane M Owen to Penny Thomas cc John Longman RE: Horizon Integrity Cases with handwritten notes | POINQ0161265F |
| 171. | POL00114698 | Email to Pat Davies RE: Darlington-Alderley Edge- Wilson Astwood Bank | POL-0113799 |