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Post Office Horizon IT Inquiry
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By email to: Gregg.Rowan GRO
Andrew.Lidbetter GRO Christine.Iacon GRO
Antonia.smith GRO HSFPOLInquiryService GRO

Our ref: POLR9-14/JB/20220615

Your ref:

15 June 2022

Dear Mr Rowan

Request for information pursuant to Rule 9 of the Inquiry Rules 2006 – Request Number 14 concerning documents of relevance to Phase 4

I am writing to you to make a formal request on behalf of the Chair of the Post Office Horizon IT Inquiry under Rule 9 of the Inquiry Rules 2006 for documents. This is the fourteenth request that has been made to your client under the Inquiry Rules 2006. The purpose of this request is to address issues of relevance to Phase 4 of the Inquiry. Accordingly, please provide the following information and documents:

A. Contractual Liability for Shortfalls

1. Policies and guidelines (applicable in the four countries of the United Kingdom) relating to the contractual liability of subpostmasters and other end users (such as Crown office employees) for shortfalls shown by Horizon during the relevant period¹.
2. Any formal legal advice relating to the policies and guidelines described at 1. above.
3. Please confirm which department(s) held responsibility for the policies and guidelines described at 1. above. Who held responsibility for the management and oversight of that department?
4. Any guidance, training or instruction (applicable in the four countries of the United Kingdom) given to those responsible for conducting audits of subpostmasters' branch accounts.
5. Please provide details of the experience and qualifications of those responsible for conducting audits of subpostmasters' branch accounts.

¹ As defined in the Inquiry's completed list of issues.

6. Please confirm which department(s) held responsibility for conducting audits of subpostmasters' branch accounts during the relevant period. Who held responsibility for the oversight and management of that department?
7. Any reports, reviews, formal legal advice or investigations (produced by POL or by an external firm on POL's behalf) which address the quality of the audits conducted in respect of subpostmasters' branch accounts.
8. Any guidance, training or instruction (applicable in the four countries of the United Kingdom) given to those responsible for making determinations in relation to the suspension, reinstatement or termination of subpostmasters and any consequent appeals.
9. Please provide details of the experience and qualifications of those responsible for making determinations in relation to the suspension, reinstatement or termination of subpostmasters and any consequent appeals.
10. Please confirm which department(s) held responsibility for making determinations in relation to the suspension, reinstatement or termination of subpostmasters and any consequent appeals. Who held responsibility for the management and oversight of that department?
11. Any reports, reviews, formal legal advice or investigations (produced by POL or by an external firm on POL's behalf) which address the quality of the decisions taken in relation to the suspension, reinstatement or termination of subpostmasters and any consequent appeals.
12. Any reports, briefings or formal legal advice relating to the decision to remove the contractual right of appeal from subpostmasters.
13. Any guidance, training or instruction (applicable in the four countries of the United Kingdom) given to those responsible for taking civil enforcement action to recover shortfalls shown by Horizon.
14. Please provide details of the experience and qualifications of those responsible for taking civil enforcement action to recover shortfalls shown by Horizon.
15. Please confirm which department(s) held responsibility for making determinations in relation to the bringing of civil enforcement action against subpostmasters to recover shortfalls shown by the Horizon. Who was responsible for the management and oversight of that department?
16. Any reports, reviews, formal legal advice or investigations (produced by POL or by an external firm on POL's behalf) which address the fairness and / or appropriateness of taking civil enforcement action against subpostmasters to recover shortfalls shown by Horizon.

B. Civil Case Studies

17. All records relating to the conduct of branch audits, civil interviews, decisions on suspension, reinstatement, termination and appeal, as well as the threat, instigation and pursuit of civil enforcement action in respect of the following individuals:
 - a. Aslam Ramtoola, subpostmaster between 1988 – 2000, Rochdale, England.
 - b. Katherine McAlerney, subpostmistress between 2000 – 2008, County Down, Northern Ireland.
 - c. Lee Castleton, subpostmaster between 2003 – 2004, Marine Drive, Bridlington, England.
 - d. Susan McKnight, subpostmistress between 2005 – 2009, Wigan, England.
 - e. Rachel Williams, subpostmistress 2006 – 2008, Somerset, England.
 - f. Keith Macaldowie, subpostmaster 2006 – 2011, Greenock, Scotland.
 - g. Tracey Etheridge, subpostmistress between 2008 – 2011, Gurnos Estate Post Office, Merthyr Tydfil, Wales.
 - h. Kevin Palmer, subpostmaster between 2007 – 2016, Essex, England.
 - i. Frank Holt, subpostmaster 2008 – 2017, Invernesshire, Scotland.

C. Private Prosecutions

18. Policies and guidelines (applicable in the four countries of the United Kingdom) relating to the bringing of private prosecutions against subpostmasters and other end users (including Crown Office employees) alleged to be responsible for shortfalls shown by Horizon during the relevant period.

19. Any formal legal advice relating to the policies and guidelines described at 18. above.

IRRELEVANT

21. Any reports, briefings or formal legal advice relating to the decision to suspend and / or cease the bringing of private prosecutions.

22. Any guidance, training or instruction (applicable in the four countries of the United Kingdom) given to those responsible for conducting criminal investigations into the conduct of subpostmasters and other end users alleged to be responsible for shortfalls shown by Horizon.

IRRELEVANT

25. Any reports, reviews, formal legal advice or investigations (produced by POL or by an external firm on POL's behalf) which address the quality of the criminal investigations conducted into subpostmasters and other end users alleged to be responsible for shortfalls shown by Horizon.

26. Any guidance, training or instruction given to those responsible for making charging decisions in respect of subpostmasters and other end users alleged to be responsible for shortfalls shown by Horizon.

IRRELEVANT

30. Any guidance, training or instruction given to those responsible for conducting the prosecution of subpostmasters and other end users alleged to be responsible for shortfalls shown by Horizon.

IRRELEVANT

34. Any guidance, training or instruction given to those responsible for disclosure in criminal proceedings brought against subpostmasters and other end users alleged to be responsible for shortfalls shown by Horizon.

IRRELEVANT

IRRELEVANT

37. Any reports, reviews, formal legal advice or investigations (produced by POL or by an external firm on POL's behalf) which address the fairness and / or appropriateness of the disclosure given in criminal proceedings.
38. Any guidance, training or instruction given to those responsible for the negotiation and acceptance of pleas by subpostmasters and other end users alleged to be responsible for shortfalls shown by Horizon.

IRRELEVANT

C. Criminal Case Studies

42. All records relating to the conduct of the criminal investigations and interviews, the laying of charges and the conduct of the private prosecutions, and decision in relation to the disclosure of documents, as well as the negotiation and acceptance of pleas in respect of the following individuals:
 - a. Lisa Brennan
 - b. David Yates
 - c. David Blakely
 - d. Tahir Mahmood
 - e. Hughie Thomas
 - f. Carl Page
 - g. Janet Skinner
 - h. Jo Hamilton
 - i. Paula Stonehouse
 - j. Julian Wilson (deceased)
 - k. Peter Holmes (deceased)
 - l. Seema Misra
 - m. Allison Henderson
 - n. Lynette Hutchings
 - o. Khayyam Ishaq
 - p. Angela Sefton
 - q. Ann Nield
 - r. Susan Rudkin
 - s. Susan Hazzleton
 - t. Oyeteju Adedajo
 - u. Joan Bailey
 - v. Nichola Arch
 - w. Suzanne Palmer.

All documents must be provided to the Inquiry in unredacted form. Any requests for redactions and/or applications for restriction orders should be made in accordance with the Inquiry's published Protocol on Redaction, Anonymity and Restriction Orders, which provides that such requests should not be made until after the Inquiry confirms that it wishes to disclose the document (or within 7 days of the Inquiry confirming that it will not be making the redaction on relevance grounds, if later).

In order to respond to this Request, you will be provided with a Quatrix link via email to your email address. Please provide all documents separately (i.e. do not combine several documents into one pdf). Please also provide any covering letter in response to both Solicitor@GRO and Julie.Beaumont@GRO quoting our reference above.

Deadline for responding to this request

Please respond to this Rule 9 Request **by 4.00pm on Friday 15th July 2022.**

If you have any questions, please do not hesitate to contact me. I look forward to hearing from you.

Yours sincerely

GRO

Julie Beaumont
Lawyer
Post Office Horizon IT Inquiry