

Witness Name: Deborah Stapel

Statement No.: WITN08900100

Dated: 15th October 2023

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF DEBORAH STAPEL

I, DEBORAH STAPEL, will say as follows

INTRODUCTION

This witness statement is made to assist the Post Office Horizon IT Inquiry (the “**Inquiry**”) with the matters set out in the Rule 9 Request dated the 8th September 2023 (the “**Request**”).

BACKGROUND

1. I was called to the Bar in 1987. I worked for a short time as a legal assistant at Hallett & Co prior to joining the Criminal Law Team in 1989.
2. My main role as a senior lawyer in the Criminal Law team was to advise on case papers submitted by the Security Team and where prosecution was advised to conduct the case through to its conclusion. I would also deal with any other matter allocated to me by the Head of the Criminal Law Team. In November 1997 I had a years maternity leave followed by a three year

career break. I returned to work in the autumn of 2001. From that date to 2006 I advised on both "letter" and "counter" cases. "Letter" cases related to postmen and postal packets and "counter" cases to Crown Office employees and SPMs and their assistants. From 2006, with the exception of the case of Carl Page, I ceased dealing with "counter" cases and was responsible for all "letter" cases in the geographical area covered by our Agents.

3. I left Royal Mail in March 2013.

Policies / practices in place and the Criminal Law Team's role relating to relevant prosecutions

4. The Criminal Law Team's role relating to the prosecution of SPMs, managers, assistants and Crown Office employees alleged to be responsible for shortfalls shown by data from the Horizon IT System was to review, advise on and to prosecute cases, where appropriate, based on the evidence submitted by the investigation manager. All lawyers had a copy of the Code for Crown Prosecutors. Prior to any decision being made lawyers would need to be satisfied that they had all the information necessary to make a decision and that the evidence was admissible, reliable and credible and where appropriate case files would be returned for further information to be obtained. Where it was considered that there was sufficient evidence to afford a realistic prospect of conviction based upon the evidence and any defence that had been put forward, lawyers would consider the public interest test namely whether there were public interest factors tending

against prosecution which outweighed those tending in favour. One of the factors tending in favour of prosecution was the fact that suspects were usually in a position of trust. Any advice on prosecution would be sent to the Casework Manager who in turn would forward it to the decision maker within POL to authorise the prosecution.

The rationale behind the practice of bringing private prosecutions

5. The rationale behind RMG and POL's practice of bringing private prosecutions against its agents/staff where they were suspected of financial crime is historic. It had been doing so for centuries. In the present day, POL investigators were familiar with most of the accounting systems in place and the procedures that had to be followed on a daily and weekly basis. They also knew where to source documentation from. On occasions the police would contact POL after arresting a suspect with a request that POL assisted at interview and took over the investigation. The CPS made similar requests.
6. POL did not cease the practice of bringing private prosecutions before I left.

Policies governing prosecution and charging decisions and the conduct of prosecutions

7. I have been asked to consider documents POL00030659, POL00031012, POL00039945, POL00039951, POL00039952, POL00030578, POL00104812, POL00031011, POL00030580, POL00030579, POL00026573, POL00031008, POL00030598, POL00104853,

POL00104855, POL00030685, POL00030800, POL00031034,
POL00104929 and POL00105226.

8. I can say that POL00039945, POL00039951 and POL00039952 were policies that I reviewed. I would have been aware of the contents of the Post Office Internal Prosecution Policy (dishonesty) (December 1997) (POL00030659) and paragraph 3.3 of the Investigation and Prosecution Policy (March 2000) (POL00031012). The remaining documents came into being after I stopped working on "counter" cases. The author of the Post Office Internal Prosecution Policy (dishonesty) (December 1997) (POL00030659) document was Andrew Wilson and I am not sure to whom this document was circulated. In it, Andrew Wilson sets out the Post Office's prosecution policy, namely that acts of dishonesty in relation to the illegally acquiring of Post Office property or assets, or the property or assets of Post Office customers and clients while in Post Office custody would normally be prosecuted where this is deemed to serve the public interest. He recommended that a single point within the Personnel Department of each Business Unit should be the prosecution decision maker. In relation to Paragraph 3.3 of the Investigation and Prosecution Policy document (POL00031012). I would say that the reference to "in accordance with the criminal law" would include The Code for Crown Prosecutors. The Code for Crown Prosecutors was the key document followed when prosecution decisions were made. The other documents were published after I stopped doing "counters" cases.
9. In relation to POL00039945, POL00039951 and POL00039952 I would have been provided with a draft policy document and asked to make any

amendments necessary. I cannot now recall whether any such amendments were necessary. These documents would have been reviewed annually, usually by the Head of Criminal Law.

10. In my time working for POL, I believe that in the main only theft or false accounting charges were considered. The Fraud Act came in shortly before I stopped doing "counters cases". The appropriate charge(s) would reflect the seriousness and extent of the offending as supported by the evidence. Rob Wilson reinforced the fact on numerous occasions that it was inappropriate to draft the charges in the alternative. I believe there was case law regarding this. The Code for Crown Prosecutors also indicated that prosecutors should not proceed with a more serious charge to encourage a Defendant to plead guilty to a less serious one. In relation to false accounting, I believe that there was a policy that prosecution would not be considered when the sum involved was less than £5000. This was on the basis that it was not in the public interest for such cases to be prosecuted. I believe this conclusion was reached following the courts imposing nominal penalties in such cases.
11. The Criminal Law Team was led by the Head of Criminal Law who would allocate cases and any other work to the individual lawyers in the department. Lawyers would hold the position of lawyer, senior lawyer or principal lawyer. There were also two legal executives who would deal with Crown Court work and two secretaries. Up until 2006 all lawyers would undertake both "letters" and "counters" cases. In 2006 my role changed, and I was responsible for dealing with all "letters" cases in the Agents area. The remainder of the team advised on "counters" cases and "letters" cases in the office area. I retained conduct of the case of Carl Page.

12. In general terms the Criminal Law Team would advise on evidence and where appropriate draft charges. The decision to prosecute would be made by a designated decision maker. The person making that decision changed over the years. In the event that prosecution was authorised, summonses would be issued and either Agents or Counsel would be instructed to appear at the Magistrates court on behalf of POL. In an Agents area case, following committal proceedings the case was handed over to our Agents who would have conduct of the case. In office area cases Counsel would be instructed to draft the Indictment and advise on evidence. Conferences would be routinely held with Counsel to discuss both evidential and disclosure matters.
13. Rob Wilson was responsible for supervising or reviewing the conduct of private prosecutions. Prior to Mr Wilson becoming Head of Criminal Law, Mr Heath would have had that responsibility.
14. Mr Wilson would not have received any training but was an experienced prosecuting solicitor who had worked for POL for many years. The same applied to Mr Heath.
15. Mr Wilson would expect any issues on cases to be raised with him. He would also see the post each morning and raise any concerns in correspondence with the lawyer. He would also periodically check files.
16. There was no independent oversight exercised in relation to the conduct of prosecutions.
17. I am not aware that Post Office policy regarding prosecution of Crown Office employees differed from the policy and practice regarding prosecution of SPMs and their managers/assistants. This did not change whilst I conducted "counters" cases.

Involvement of the Criminal Law Team in advising on investigations

18. I have considered The Casework Management document at POL00104747 and POL00104777, POL00118096, POL00118108, POL00118109, POL00118101, POL00118102, POL00118103, POL00118104, POL00118105, POL00118106 and POL00118107.

19.

- I. I can say that I was not working for POL in 2000 and therefore do not believe that I have previously had sight of the Casework Management document at POL00104747. The 2002 version at POL00104777 is not a document that I recognise as having previously seen and I did not have any input into the document.
- II. As stated I do not believe that I have previously had sight of either POL00104747 or POL00104777. Whilst working for POL I was unaware that there were bugs, errors or defects in Horizon.
- III. I was not working for POL in May 2011 and do not believe that I had sight of the documents attached to Dave Posnett's email.
- IV. I was not involved in the development, management or amendment of the documents.

- V. I was not familiar with these documents.
 - VI. I was not involved in the drafting of the document entitled "Identification Codes" at POL0011804 nor have I seen that document before. I was aware that Identification Codes were used by the Security Team. In the preamble to the Investigator's report there was a heading, "Identification Code".
 - VII. I was not aware of the "Identification Codes" document.
 - VIII. My understanding was that in the event of a conviction certain information was required by the police including the ethnicity of the person convicted.
20. The Criminal Law Team did have input into the formulation of RMG/POL policies and guidance in relation to the applicable statutory provisions, codes of practice issued under statute, guidelines and guidance. This was normally undertaken by the Head of Criminal Law. The Security Team had a database that contained all their policies and I believe any new policy was either circulated to the investigators or they were advised that it had been added to the database. Policies on procedure e.g the conduct of tape recorded interviews, the completion of notebook entries etc were reviewed on a regular basis and the reviewing lawyers name would be on the document. From the documents I have had sight of I reviewed POL00039945, POL00039951 and POL00039952. I may have reviewed other policy

documents of a similar nature but after the time that has elapsed I cannot give specifics.

21. I recall that as part of their training members of the Security Team took part in a mock trial. The case papers would contain numerous errors to highlight the importance of following the correct procedures. Junior counsel would be instructed to act as prosecuting and defence counsel and a member of the Criminal Law Team would play the part of the judge. Lawyers were also expected to highlight any problems in case papers and further training would be given by the Security Team to the investigators involved where this was deemed necessary.
22. When case files were submitted prosecution decisions were made if the lawyer considered the evidence contained therein was sufficient for such a decision to be made. Where further enquiries were needed to enable that decision to be made or for the public interest test to be properly assessed the papers would be returned with a request for further evidence to be obtained or lines of enquiry to be made.

Process for prosecution and charging decisions

23. Where the evidence was sufficient to afford a realistic prospect of success and it was in the public interest for a prosecution to ensue the lawyer would advise appropriate charges. The file would then be returned to the casework manager who would in turn forward it to the relevant person for authorisation. I can see from POL00030659 that in 1997 the recommendation was that a single point within the Personnel Department of each business unit would

make that decision. From POL00031012 it would appear that in 2000 the relevant person for authorising the prosecution was SIS. After the passage of time I can no longer recall who that person was. The person authorising the prosecution would be addressing the public interest test and would have had a copy of the Code for Crown Prosecutors. I was not working for POL on the dates that the remaining documents were published and can therefore not assist with the contents of those documents.

24. Prosecution and charging decisions in respect of SPMs, managers, assistants and Crown Office employees alleged to be responsible for shortfalls shown by data from the Horizon IT system were made by the lawyer who had conduct of the case. This did not change during the period that I was employed within the Criminal Law Team.
25. Charging decisions were taken at the same time as prosecution decisions. This did not change during the period that I was employed within the Criminal Law Team.
26. The legal advice would be given by lawyers in the Criminal Law Team and during the period I worked on POL cases I am unaware that this changed. A very small percentage of cases were sent to Counsel to advise on the sufficiency of the evidence and whether it was in the public interest to prosecute. These tended to be complex cases where it was considered that it would be helpful to have Counsel's input from the beginning. I can not recall this changing whilst I did POL cases.
27. All lawyers were either barristers or solicitors. In addition to their legal training each lawyer, on joining the Criminal Law Team, would be supervised

by other lawyers in the team for a period of up to two years to ensure that cases were properly advised on and that a consistent approach was taken.

28. Those involved in investigating a suspected offence would outline in the offender report the charges that they believed were supported by the evidence and any undermining material that existed. They would also highlight any matters that might impact on the public interest test, for example the ill health of the suspect. They did not have input into whether the test for prosecution was met.

The test applied

29. Prosecution decisions were made in accordance with the Code for Crown Prosecutors namely whether the evidence was sufficient to afford a realistic prospect of conviction of a suspect on a criminal charge. In reaching a conclusion an assessment of the evidence would need to be made namely whether the evidence submitted was reliable, credible and admissible. Any evidence that undermined the prosecution case or assisted the Defence case would also need to be considered. In the event that this test was made out a decision would have to be made as to whether it was in the public interest for a prosecution to ensue. In the event that there were public interest factors tending against prosecution which outweighed those in favour a decision would be made that it was not in the public interest for a prosecution to be brought. From memory cases where a decision was made that it was not in the public interest to prosecute usually involved the health of the suspect. I recall that it was agreed that it was not in the public interest for cases of false

accounting involving a shortfall of less than £5000 to be prosecuted. Of the policy documents I have been asked to consider only POL00030659 had been published whilst I worked on "counters" cases. The author of this document was Andrew Wilson and I am not sure to whom it was circulated. From the content I would be surprised if it had been approved by a lawyer. The document is titled "POST OFFICE INTERNAL PROSECUTION POLICY (DISHONESTY)" and I have been asked to consider paragraph 5. It appears to be directed to the "letters" side of the business and despite its title, reference is made to offences of wilful delay of mail, opening mail and criminal damage, offences that do not involve dishonesty. It contains huge generalisations. Paragraph 5 states that, "in order to provide a deterrent and to serve the public interest it is clearly necessary to prosecute offenders in the criminal category". No reference is made to the public interest factors set out in the Code for Crown Prosecutors. The conclusion that offenders in the "irresponsible" and "irrational" categories would not be prosecuted did not reflect the position regarding the types of offences that were prosecuted on the "letters" side of the business. This is not a document that lawyers took into consideration in deciding whether a prosecution should take place. POL00030578, POL0031011, POL00030580, POL00030598, POL00030685, POL00030800 and POL00031034 were all published after I ceased doing "counters" cases.

30. I do not consider that the guidance contained within the policy documents on the test to be applied when making prosecution and charging decisions was adequate. As stated at paragraph 29 I do not consider that was the purpose

of POL00030659. The guidance in the Code for Crown Prosecutors was followed at all times.

31. Whilst I was employed at POL advice was only sought from Counsel before a decision to prosecute was made in complex cases. I cannot recall the position changing during the period I advised on POL cases.
32. As a matter of policy it was the Criminal Law Team's role to provide advice on the public interest stage of the prosecution test. In considering this stage of the prosecution test, the papers would on occasion be returned to the investigator for further enquiries to be made. The prosecution decision maker would have had a copy of the Code for Crown Prosecutors. The prosecution decision maker was expected to consider the public interest test and would have received training on how to do so. I was not involved in providing that training nor did I participate in it. On rare occasions the prosecution decision maker would return the papers to casework flagging up a public interest factor that the Criminal Law team had been unaware of.

The conduct of prosecutions

33. The following legislation, codes and principles governed the conduct of POL prosecutions:- the Code for Crown Prosecutors issued under section 10 of the Prosecution of Offences Act 1985 gave guidance on the general principles to be applied when making decisions about prosecutions, the relevant statutes and case law set out the actus reus and mens rea of a particular offence and how to prove it, the Police and Criminal Evidence Act 1984 dealt with police powers of investigation, the Criminal Procedure and

Investigations Act 1996 set standards to regulate the investigation process and the recording and retention of material found or generated during the course of an investigation together with Codes of Practice. POL00030659 sets out the fact that the usual course was to prosecute all breaches of the criminal law by employees which affect the Post Office and which involve dishonesty. POL00031012 refers to the fact that the prosecution guidelines of the business will be used in making any decision to proceed under criminal law. Where prosecution was advised this was in accordance with the Code for Crown Prosecutors.

34. England and Wales were divided into office and Agent areas. With the exception of a minority of office area cases Counsel were instructed by lawyers in the Criminal Law team from the first hearing in the magistrates Court to the conclusion of the case. In a minority of cases Counsel were instructed to advise on the sufficiency of evidence and whether it was in the public interest for charges to be brought. In Agents cases, if my recollection is correct, lawyers in the Criminal Law team would advise on charges and evidence and would prepare the committal bundle. Agents would be instructed from the first hearing in the magistrates court and after committal proceedings would take over the conduct of the case in the Crown court which would include instructing counsel and drafting the Indictment. In complex cases the Criminal Law team would retain Agent area cases and use Agents to attend Magistrates court hearings only. I am not aware that this changed.

Disclosure

35. I do not believe that the purpose of the prosecution policy documents at paragraph 7 above were aimed at the disclosure obligations on the Prosecution. The Intranet would have had policy documents on disclosure and the completion of the forms. These documents would have been reviewed by a lawyer.
36. I believe a policy document regarding disclosure from third parties would have also been on the intranet.
37. My understanding of the disclosure obligation on POL as prosecutor was to disclose to the accused any material which might reasonably be considered capable of undermining the prosecution case or assisting the case for the accused which had not previously been disclosed. The duty of disclosure was an ongoing one throughout proceedings and involved the disclosure of relevant material. The duty of disclosure imposed an obligation for investigators to pursue all reasonable lines of enquiry whether they pointed towards or away from the suspect. The disclosure officer would prepare schedules of unused material which would be served on the Defence with the committal papers. Copies of the material listed would be provided unless the volume of the material was vast. Copies of any material that were considered to undermine the prosecution case or assist the Defence would always be copied. When a Defence statement was received a copy would be forwarded to the disclosure officer and Counsel to ascertain whether further material needed to be obtained. A conference would normally be held with Counsel to discuss the Defence statement and disclosure.

38. I believe that in the majority of cases the lead investigator would hold the role of disclosure officer in relation to private prosecutions brought by POL.
39. The person who held the role of disclosure officer would also usually be the lead investigator. They would have received training from the training department. Where there were changes in legislation and guidelines, the security department and training wing would be informed, policy documents would be amended and circulated to all investigators.
40. Whilst I was employed by POL I would have reviewed the disclosure in every case from when the file was submitted to the conclusion of the case. If my memory is correct in Agents cases, the Agents instructed would take over the conduct of the case in the Crown Court. Up to the point that that happened disclosure would be my responsibility.
41. The person(s) holding the roles of investigation officer, officer in charge and/or disclosure officer did not make decisions about the conduct of prosecutions.
42. After the passage of time it is difficult to recall advice that was given to investigators about their disclosure obligations. Investigators certainly understood that all material generated during the course of an investigation needed to be retained and enquiries were needed to ensure that any material that may undermine the Prosecution or assist the Defence was obtained. As a matter of routine they would for example be asked to make enquiries from the helpdesk if this had not already be done. When the Defence statement was received it would be copied to the disclosure officer and Counsel so that disclosure could be reviewed. Advice would be given regarding material that

should be sought. In Crown court cases a conference would usually take place where both evidence and disclosure would be discussed.

43. Where the integrity of the Horizon IT system was being challenged the investigator would be asked to obtain any relevant data/ information from Fujitsu. At the time I conducted POL cases I was unaware of any bugs or defects in the system and believed that Horizon was a robust and reliable system. Dr Jenkins, in his expert witness statement would have asserted that and as an expert would have been under a duty to disclose any information that undermined that position.
44. After committal proceedings or a transfer to the Crown Court Counsel would be instructed to draft the Indictment and advise on evidence and disclosure. In Agent area cases Counsel would have been instructed by our Agents.
45. Counsel who were instructed to prosecute were familiar with Horizon. When Horizon was initially installed in offices, Counsel and Agents who were regularly instructed on POL cases attended a training day where they were shown how entries were physically made onto Horizon and how the system worked. The witness bundle would have contained a statement regarding the operation of Horizon.
46. Having reviewed the Defence statement, it would have been forwarded to both the disclosure officer and Counsel. I would have given advice regarding the areas that needed to be addressed. A conference with Counsel would usually take place to discuss the Defence statement. If further disclosure was triggered a further schedule of unused material would be prepared and served on the Defence.

47. Other than the case of Carl Page I cannot now recall any other case I dealt with where a discrepancy was attributed to problems with the horizon IT system in the Defence statement. Pension and Allowance order books were still in existence up to 2003 and as such many of the cases up to that time would have involved the wrongful encashment of orders from those books. Cases solely involving a discrepancy between Horizon generated cash and stock and the actual physical position determined following an audit increased after order books were phased out. In such cases the Defence statement would be forwarded to Dr Jenkins who would, if necessary, make a further statement addressing the issues raised. Were Dr Jenkins aware of any information which would undermine his evidence he had a duty to inform the prosecutor who would in turn have to disclose such information to the Defence. The disclosure officer would also be asked to look into any matter raised and obtain any relevant material. I cannot now recall whether ARQ logs were always requested from Fujitsu.
48. At no time that I dealt with POL cases was I aware of any potentially relevant known bugs, errors or defects in the Horizon IT system. Had I known that any such bugs, errors or defects existed then such an allegation in a Defence Case Statement or Defence Statement would clearly have triggered an obligation to disclose such information.

Experts

49. I do not know what information was provided to experts instructed by the prosecution as to their role, including, in particular, their duty to the court and

the meaning and importance of the expert's declaration. The statements were obtained by the investigators. Dr Jenkins statement included the words "I understand that my role is to assist the court rather than represent the views of my employers or Post Office Ltd". The words are self-explanatory. My recollection is that when Horizon was rolled out the Head of the Criminal Law team instructed Counsel to advise on the expert evidence that would be required and what the statement needed to cover. I believe Fujitsu were then asked who in their company would be able and willing to provide that expert evidence. I do not know what instructions were given. As far as I recall only Dr Jenkins provided an expert witness statement in cases I dealt with.

50. I cannot recall any policies or guidelines in place regarding the provision of evidence by employees of Fujitsu whilst I worked in the Criminal Law Team.
51. At the time I believed that Dr Jenkins was the ultimate expert on Horizon. It did not occur to me that there could be a potential conflict of interest. I do not recall a challenge ever being made by the court or the Defence regarding the use of Dr Jenkins as an expert witness. His role was to provide objective, unbiased opinion on matters within his expertise to assist the court and not the prosecution.

Criminal enforcement proceedings

52. I worked three days a week and as such was not required to deal with criminal enforcement proceedings.
53. As above.
54. As above.

55. As above. As I did not deal with criminal enforcement proceedings I am not familiar with the Financial Investigation Unit process documentation (POL00084988 and POL00084989) which was appended to the 2009 "Former Subpostmaster End to End Debt Review" (POL00084977), as well as POL00051382

Audit data from Horizon to support investigation, prosecution and / or other legal proceedings

56. I cannot recall what the contractual requirements on Fujitsu were. I am aware that there were limits on the number of ARQ requests which could be made without additional costs being occurred. I do not know how any requests above the limits were dealt with or charged but this would not have been a factor taken into consideration in deciding whether such documentation should be obtained. I was not working for POL when Horizon online was introduced. I had no role in obtaining audit data. I do not know who authorised an ARQ request. I cannot recall who from Fujitsu was responsible for the provision of this data or how the data was presented. I do not know of any additional prosecution support Fujitsu was contractually obliged to provide.
57. The documents titled "Conducting Audit Data Extractions at CSR" dated 4th May 2000 at POL00029169 and "Conducting Audit Data Extractions at Live" dated 27th November 2001 at FUJ00152176 are the only documents that were published whilst I was conducting POL cases. I do not recall having seen them before. The versions of the document entitled "Management of

the Litigation Support Service" dated 27th October 2009 (FUJ00152212), 14th February 2012 (FUJ00152220) and 23rd April 2012 (FUJ00152225), as well as the version marked "withdrawn" at FUJ00152235 were published after I stopped doing POL cases. The same applies to the versions of the document entitled "Audit Data Extraction Process" dated 13th September 2010 (FUJ00152216), 1st March 2011 (FUJ00152218) and 14th February 2012 (FUJ00152221) and the document entitled "Security Management Service: Service Description" (SVM/SDM/SD/0017) dated 24th August 2006 (FUJ00002033), 31st December 2008 (FUJ00080107) and 15th October 2010 (FUJ00002264).

Your involvement in Criminal Prosecution Case Studies

R -v- Carl Page

58. I believe I first became involved in the case involving Carl Page and John Whitehouse when the investigation file was submitted to the office. Mr Wilson will have allocated the case to me to deal with. Unusually he made the decision that he would be the second lawyer on the case.
59. I have considered the fax from Manish Patel to the Custody Sergeant at Stafford Police Station at POL00093900, the email from me to Manish Patel dated 7th April 2004 at POL00093930, the letter from Frisby & Co solicitors to me dated 23rd April 2004 at POL00093933, the internal memo from Manish Patel to me dated the 2nd June 2004 and case conference note dated 6th July 2004 (final page) at POL00093910, the internal memo from Manish Patel to me dated the 5th July 2004 at POL00093931, the letter from me to Frisby &

Co solicitors dated 23rd September 2004 at POL00094100, letter from me to Frisby & Co solicitors dated 7th October 2004 at POL00067072, the letter from me to JMW solicitors dated 7th October 2004 at POL00067074, letter from me to Frisby & Co solicitors dated 8th November 2004 at POL00067082, the internal memo from Manish Patel to me dated 8th November 2004 at POL00093928, the two electronic memos from Lisa Baddevithana to me dated 16th November 2004 and my reply dated 19th November 2004 at POL00067116, the electronic memo from me to Lisa Baddevithana dated the 19th November 2004 at POL00067114, the electronic memo from Lisa Baddevithana to me dated 19th November 2004 and the electronic memo from Manish Patel to Lisa Baddevithana with me cc'd of the same date at POL00067085, the letter from me to Frisby & Co solicitors dated 23rd November 2004 at POL00067089, the letter from me to Frisby & Co solicitors dated 25th November 2004 at POL00067090, the letter from Frisby & Co solicitors to me dated the 29th November 2004 at POL00067088, the letter from me to Frisby & Co solicitors dated 1st December 2004 at POL00067087, electronic memo from Lisa Baddevithana to me dated 2nd December 2004 and my reply dated 3rd December 2004 at POL00067093, letter from Frisby & Co solicitors to me dated 25th January 2005 at POL00067097, the letter from me to Frisby & Co solicitors dated 17th March 2005 at POL00067099, the electronic memo from Frisby & Co solicitors to me dated 16th May 2005 at POL00067104, letter from me to Frisby & Co solicitors dated 20th May 2005 at POL00067108, letter from Frisby & Co solicitors to me dated 20th May 2005 at POL00067109, letter from Frisby & Co solicitors to me dated the 23rd May 2005 at POL00067110, letter from Frisby & Co solicitors to me dated

26th May 2005 at POL00067081, letter from me to Frisby & Co solicitors dated 27th May 2005 at POL00067084, letter from me to Frisby & Co solicitors dated 23rd February 2006 at POL00066545, memo from me to the Investigation Team Post Office Ltd at POL00053309 and memo from me to the Investigation Team Post Office Ltd dated 3rd July 2014 at POL00066519.

60. I have considered the documents set out at i) to xii) namely The Case File Events Log at POL00093908, the records of interview from 14th January 2003 at POL00093702 (commencing at 17:17) POL00093701 (commencing at 18:06) and 23rd April 2003 at POL00093703 (commencing at 16:31), POL00093760 (commencing at 17:18) and POL00093759 (commencing at 18:02) and POL00093758 (commencing at 18:54), the prosecution case summary dated 3rd June 2004 POL00065034, the witness statement of Andy Dunks FUJ00122250, the witness statement of Glyn Burrows POL00093714, the witness statement of Kevin Orgill POL00093733, the witness statement of Deborah Alison Edwards POL00093897, the witness statements of Manish Patel POL00093755 and POL00093868, the bundle of witness statements at POL00066551, the expert accountant's report of David Liddell, dated 16th May 2005 POL00062201, the expert report of Mr Taylor, dated 7th April 2006 POL00061214 and the transcript of Mr Page's evidence at POL00067005
61. I first became involved in the case involving Carl Page and John Whitehouse when the investigation file was submitted to the office. Mr Wilson will have allocated the case to me to deal with. Unusually he made the decision that he would be the second lawyer on the case. His role included being familiar with the evidence, considering disclosure and attending conferences with Counsel.

62. My knowledge and understanding of the initial investigation was that H.M Customs & Excise suspected Mr Whitehouse of money laundering. I am unaware whether any audits were carried out by H.M Customs & Excise although I can say that an audit of the Post Office was not undertaken by H.M Customs & Excise.
63. My Understanding is that Staffordshire Major Crime Unit were called in by H.M Customs & Excise after officers from H.M Customs & Excise arrested Mr Whitehouse as he attended a Bureau de Change facility. He had in his possession 585000 euros and a receipt from Rugely Post Office dated that day for a bureau transaction for £360000 worth of Euros at an exchange rate of 1.62. Post Office investigators attended Staffordshire Police HQ facility to liaise with DI Mark Abbotts and his team (POL00093908 Case File Events Log). Mr Page was arrested by the police who conducted a search of the Post Office and subsequently conducted a short interview with him that evening. Post Office investigators were present at the search to point out items that should be seized. A police officer was present at a second interview, with Mr Patel being the lead interviewer. On the 14th January 2003, at a meeting with officers from Staffordshire Major Crime Unit Post Office investigators agreed that the Post Office would take charge of the investigation and any resulting prosecution, with the police assisting with the financial investigation and undertaking phone analysis.
64. I have considered POL00045921, a letter from Staffordshire Police to Mr Whitehouse dated the 7th May 2003. I am unaware of any discussions that took place with the police before a decision to charge Mr Page and Mr Whitehouse was made. I was somewhat surprised by the conclusion of the

police not to press charges on the basis that their enquiries had "not provided any clear evidence of criminal conduct either by, or between, the two men" given that the police had not conducted the investigation but had passed it to the Post Office to do so. I do not know when I became aware of the existence of this letter

65. Stephen John made the charging decision in this case. Mr Page and Mr Whitehouse were jointly charged with conspiracy to defraud and Mr Page was additionally charged with theft.
66. Stephen John was instructed to advise on whether there was sufficient evidence so as to afford a realistic prospect of the conviction of Mr Page and Mr Whitehouse and whether it was in the public interest for a prosecution to take place. His advice was that a conspiracy to defraud charge should be brought against Mr Page and Mr Whitehouse and a charge of theft against Mr Page.
67. I can no longer recall who authorised the prosecution of Mr Page.
68. Mr Patel was the lead investigator in these proceedings. After 19 years I am not able to describe any discussions that I had with him during the course of this case. I can say that there were numerous conferences with Counsel where both evidence and disclosure were discussed.
69. I cannot recollect whether any Horizon data was requested from Fujitsu in this case.
70. I have been asked to consider the report of David Liddell at POL00045867 and his supplemental report at POL00045868. I would have become aware of these reports when they were served on the Prosecution. I have been asked to consider paragraph 2.7 of the first report. This was an extremely

complicated case and I have little memory of it. My recollection is that the Prosecution agreed that a surplus could not have physically built up in the "AM" stock or elsewhere. Mr Patel's schedules showed that all the euros sent to the Rugeley Post Office were entered into the Forde Moneychanger and were accounted for. I believe that this was the prosecution's case and therefore Mr Liddell's conclusion would not have undermined the basis of the theft charge against Mr Page. It was not considered that the timing differences set out in paragraph 2.8 of the first report could account for the alleged shortfall. The dates and times of the Euros deposited by Mr Whitehouse refuted this. Glyn Burrows in his statement at POL00093714 outlines what he and his team did in conducting the audit. He explained that he would request an "office snapshot" printout from Horizon which provided a summary of all the cash and stock which should have been present at the office at that time together with a summary of all receipts and payments in relation to transactions conducted at the office since the beginning of business on the 9th January 2003. He explains that the process was then to verify the cash and stock actually on hand at the office to see if it agreed. There is no suggestion in his statement that data was verified back to source documentation.

71. Mr Wilson, Mr John, Mr Tafford, Mr Patel and I were all responsible for ensuring primary and secondary disclosure was carried out. Stephen John was clear throughout that the Prosecution were to carry out disclosure correctly and not give blanket disclosure. He requested sight of all correspondence relating to disclosure and after discussion would draft the replies.

72. As previously stated after 20 years I cannot recollect the evidence that was relied upon by the Post Office.
73. Unfortunately, after the time that has elapsed, I cannot detail all the disclosure requests that were made by the Defence or how those requests were responded to. From the correspondence that I have had sight of it appears that all requests were addressed, material obtained and subsequently disclosed. The exception was material held by Customs which is addressed at paragraph 80 below.
74. I have been asked to consider the case conference note dated the 6th July 2004 at POL00093910. I can say that I am not the author of this note. It is not my handwriting. I do not know whether I was present at the case conference, who was present and what was discussed.
75. I would have had no involvement in drafting the witness statements. The investigators obtained all the witness statements. I would have reviewed any witness statement taken.
76. I have been asked to consider a letter to Frisby & Co solicitors dated the 25th November 2004 (POL00067090). I cannot assist regarding the conversation on the 19th November 2004 referred to therein. It would logically relate to the service of an additional list of witness statements and exhibits in relation to the Notices of Additional Evidence previously served.
77. I have been asked to consider the letter that I sent to Frisby & Co solicitors dated the 1st December 2004 (POL00067095). I cannot provide details of the recent conversation referred to.
78. I have considered the letter from Frisby & Co solicitors dated the 25th January 2005 (POL00067097) and am asked whether I responded to this

letter and the details of my response. I have no recollection of the letter and after some 18 years can not assist as to whether it was responded to. In the unlikely event that it was not Frisby & Co solicitors would clearly have chased a reply.

79. I have been asked to consider the letter from Frisby & Co solicitors dated the 23rd May 2005 (POL00067110). I cannot recall details of any conversation with Mr Cleary. I cannot recall the directions hearing and do not know whether contact was made with Mr Cottier.
80. I have considered the letter from Frisby & Co dated the 26th May 2005 (POL00067081) and my response dated the 27th May 2005 (POL00067084). I have no recollection of my letter dated the 24th May 2005 which preceded these letters. I cannot now recall my reaction to the observation made by Frisby & Co in the final paragraph but did not agree with their observation. Although I have no recollection of the visit, Stephen John, Rob Wilson and myself had attended H.M Customs & Excise headquarters and viewed the material. I can no longer recall what that material was. We concluded that the material did not fall for disclosure. Prior to the trial commencing the Defence agreed that HHJ W Wood QC would examine the material and decide whether it should have been disclosed. The material was brought to court and HHJ W Wood QC concluded that it was not disclosable.
81. Stephen John was prosecution counsel. At some point, and I can not recall when, Mr John asked whether Warwick Tafford could be his junior. Mr Tafford's role was to assist Mr John in the preparation of the case. My role was to ensure that Mr John was properly instructed so that he was able to conduct proceedings in a fair and objective manner. He was provided with all

witness statements, exhibits, schedules and copies of material disclosed to the Defence, documentation including memos from Mr Patel, correspondence from the Defence solicitors, the Defence statements and experts report.

82. As detailed at paragraph 66 above Stephen John was instructed prior to charges being brought. There were numerous conferences at which evidence, disclosure, the Defence statements and the expert report were discussed.
83. I am not sure that I had a reaction. It was the jury's role to decide on the Defendants guilt or innocence.
84. POL has always followed the guidance given by prosecuting counsel. Stephen John was of the view that it was in the public interest for a retrial to take place and the business agreed. My recollection is that Mr John was of the view that the prosecution case had come up to proof and in view of the amount alleged to have been stolen that a retrial was the appropriate course of action.
85. I believe that Stephen John advised on the further evidence that should be obtained, transcripts of some of the evidence given in court were ordered, and disclosure triggered by the first trial, the second Defence statement and the expert report were considered.
86. I have considered the Defence statement in Mr Page's retrial at UKG100012306. At the time that it was received I would have been fully conversant with the evidence in this case. After the time that has elapsed I have little independent memory of it. The Defence statement at paragraph 2 suggests that in the original trial the theft charge was related to the

conspiracy to defraud charge. That was not and never was the prosecution case. When the office was audited following the arrest of Mr Page a number of cheques paid by Mr Whitehouse were found. Initially it appeared that they related to Bureau transactions conducted by Mr Whitehouse. Mr Page later admitted that Mr Whitehouse had given him a cheque in the sum of £278181.82 as three cheques used to purchase euros in December had not been honoured. He was holding the cheque pending error notices being issued. The prosecution's case was and remained that the £282000 audit shortage had been stolen over an unknown period of time by Mr Page. The snapshot printout of Mr Page's stock indicated that there should have been £72159.03 in cash and £282000 in currency. Investigations made by Mr Patel showed from accounting period week ending 28th August 2002 through to week ending the 8th January 2002 the figure declared for currency in the cash accounts had been inflated commencing with an inflated figure of £188000 and by the date of the audit reaching £282000, the amount shown as foreign currency in Mr Page's stock. The inflated figures relied on the data from the Forde Money changer. I can no longer recall what steps were taken upon receiving the Defence statement although clearly it would have been forwarded to Counsel and the investigator and consideration would have been given to whether any further evidence or disclosure were required. I cannot recall whether Dr Jenkins made a further statement. The theft charge relied on the Horizon shortfall and at the time I believed, as did Counsel and Trevor Lockey (the investigation officer who took over from Mr Patel), that Dr Jenkins statement regarding the robustness and integrity of Horizon was factually correct and could be relied on. I believed that Dr Jenkins would

have disclosed any material which cast doubt on his opinion. I was also unaware of any bugs or problems with the Horizon data that had come to light in any other case.

87. I have been asked to consider the expert report of Mr Taylor at POL00061214. I can not comment on why Mr Page instructed a new expert.
88. I have been asked about my view of the conclusion reached by Mr Taylor in his report. Had I believed his conclusions were correct, the prosecution of Mr Page would not have continued.
89. I have considered the notification of disposal to police at POL00053308. I was surprised at Mr Page's guilty plea.
90. In relation to POL00066519 I cannot explain why the memo was dated the 3rd July 2014.
91. At the time I believed the case was fairly and competently conducted. I had no knowledge that there were any issues with Horizon. Had I been aware that there were bugs, errors and defects in the system that could, and did, cause discrepancies and shortfalls in branch accounts then prior to instructions being sent to Counsel enquiries would have been made to ascertain whether these could be excluded in relation to the Horizon data being relied on. Clearly were we not in a position to do this there would have been no basis for the prosecution of Mr Page on the theft charge. I have considered the Judgement of the Court of Appeal in Josephine Hamilton & Others v Post Office Limited (2021) EWCA Crim 577 at POL00113278. Mr Whitehouse was never charged with theft. The case against Mr Page at both the first trial and the retrial was the same. In his case summary at the first

trial Stephen John states that "Page alone is charged with theft within the same period of £282000, that being the deficiency found on audit".

R -v- Oyeteju Adedayo

92. I have no independent recollection of the criminal prosecution of Oyeteju Adedayo and my responses are based on the documents I have been provided with.
93. I have considered the documents POL00068926, POL00044360, POL00066742, POL00066745, POL00064797, POL00044361, POL00052904, POL00052916, POL00052910, POL00044363, POL000644364, POL00044367, POL00052911, POL00044362, POL00044362, POL00052588, POL00044365, POL00047897, POL00044370, POL00047865, POL00052907, POL00044358, POL00052902 and POL00052911.
94. I would have been allocated the case by Mr Wilson when it was sent to the Criminal Law Team for advice.
95. I have not seen the case papers for 18 years and therefore cannot say with certainty what exhibits and other documentation were enclosed with the investigation file.
96. I can see from POL00044361 that I advised that the evidence was sufficient to afford a realistic conviction of Mrs Adedayo on charges of false accounting. In my view false accounting reflected the seriousness and extent of the offending. Mrs Adedayo had advised the auditors who were already present when she attended the office that the accounts would be about £50000 short. Mrs Adedayo subsequently handed the auditors a note that

said "I have today 5th September confessed to the auditor regarding the sum of £50000 taken, with my mentioning it to my assistant that I was going to be repossessed and, since I have equity, no mortgage on the Rainham Hill property, I have already applied for a £50000 loan to pay back to the Post Office, as this had not been my intention to take somebody else's money."

Mrs Adedayo attended a voluntary interview with Post Office investigators in which she admitted to removing a total of £50000 on three separate occasions from the Post Office to repay monies owed to friends and family who were no longer prepared to wait for the monies to be repaid. She said that they wanted their money or would start plastering, "repossession" on the door. She was shown sample cash accounts and admitted that the cash on hand figures had been inflated and included the monies that she had removed. She accepted that she was aware that she was not allowed to use Post Office money for her own use. Mrs Adedayo indicated that her assistant ran the office and she would come in to do the balancing and cover when her assistant was absent. She was asked if she was confident using the Horizon system and said that she was. She said that her assistant was good with it and they did the balancing together. Mrs Adedayo said that the investigators could come to her house and she would give them the paperwork regarding the applications for a remortgage. It was agreed that she would forward the information by Special Delivery. Mrs Adedayo's legal rights were explained at the beginning of both taped interviews and she confirmed that she had not been asked any questions in relation to the enquiry prior to the interview. My view was that the admission made to the auditor and the interview itself were admissible and reliable. In my view the public interest required the

prosecution of Mrs Adedayo given the seriousness of the offences. Mrs Adedayo's actions involved a serious breach of trust aggravated by the fact that she involved her elderly assistant by informing her of what she was doing.

97. I made the charging decision in this case.
98. After the passage of time I do not know who authorised the prosecution of Mrs Adedayo
99. Natasha Bernard was the lead investigator in this case.
100. As indicated at paragraph 95 above, after 18 years I cannot say for certain what exhibits were contained in the file. The evidence relied upon would have been the handwritten admission made to the auditors, the audit shortage, the cash accounts and the admissions made at interview that Mrs Adedayo had falsified the cash accounts to hide the fact that she had borrowed money from the Post Office.
101. I do not believe that any Horizon data was requested from Fujitsu in this case.
102. Natasha Bernard was the disclosure officer in this case.
103. My role would have been to ensure any material that may undermine the prosecution case or assist the Defence case was disclosed. This was a continuing duty.
104. I have no recollection of any disclosure requests being made by the Defence in this case. I have not been provided with any correspondence from the Defence solicitors. Had any request been made, it would have been replied to.

105. I do not know who prosecuting counsel was in this case. Counsel was initially instructed to conduct the hearing at the magistrates court. Mrs Adedayo pleaded guilty at Chatham Magistrates Court on the 19th January 2006. Jurisdiction was declined. I do not know whether I or one of the legal executives instructed counsel to represent POL at the sentencing hearing.
106. I cannot recall having any discussions with Counsel.
107. I do not know who made the decision to commence confiscation proceedings in respect of Mrs Adedayo.
108. I had no involvement in the confiscation proceedings. I see from the Financial Investigation Events log (POL00047897) that I spoke to Michael Matthews regarding a prosecutors statement. I will have passed this to Mr Wilson to deal with.
109. I have considered the transcript of Mrs Adedayo's evidence to the Inquiry at INQ00001039. At the time I advised on evidence there would have been nothing in the papers to indicate that anything untoward had happened on the day of the audit and interview. I was not present on that day so do not know what occurred and it would therefore be inappropriate to comment save to say that on Mrs Adedayo's evidence her interview would have been ruled inadmissible. Her account of the impact that the prosecution had on herself and her family are truly heartbreaking.

R -v- Susan Rudkin

110. My involvement in the Susan Rudkin case was limited to dealing with a letter that would have been received from John Dove informing Mr Singh of the outcome of the hearing on the 26th March 2009.
111. I have considered POL00046550, POL00045243 and POL00045246, POL00050026, POL00050123, POL00046485, POL00046576, POL00046488, POL00045220, POL00050347, POL00046505, POL00046506, POL00046537, POL00051256, POL00051248, POL00051250 and POL00051252.
112. My first and only involvement with the Susan Rudkin case was dealing with a letter notifying Mr Singh that Susan Rudkin had pleaded guilty, jurisdiction had been declined and the case had been adjourned for sentence.
113. I was not involved in the prosecution of Susan Rudkin therefore would not have had sight of POL00060416, POL00061521 or POL00065265.
114. I did not give any advice on whether Susan Rudkin should be prosecuted.
115. I do not know who authorised the prosecution of Susan Rudkin.
116. I was not involved in the prosecution of Susan Rudkin and therefore do not know what evidence was obtained and relied upon by the Post Office in these proceedings.
117. I do not know whether any Horizon data was requested.
118. I have considered POL00051044, POL00059762, POL00044916 and POL00060421.
119. I have not seen the correspondence at paragraph 118 above before.
120. As stated, save for notifying the relevant parties of the outcome of the hearing on the 23rd March 2009 I had no involvement in this case. I therefore have not previously seen the letter from Richard Nelson solicitors to Mike

Wilcox dated the 7th April 2009 at POL00046524 and the enclosed letter from Dr A T Peden dated 22nd February 2009 at POL00050993.

121. I do not know who the disclosure officer was in this case.
122. I do not know who the investigation manager was in this case.
123. I had no role in relation to disclosure in this case.
124. Mr John Dove, Solicitor Advocate conducted the hearings. I had no role in instructing him save for my letter to him on the 26th March 2009 at POL00051250.
125. I did not have any discussions with Mr John Dove.
126. I had no involvement in the criminal enforcement proceedings taken against Susan Rudkin. I have considered the documents POL00050242, POL00051380, POL00052020, POL00052094, POL00055156, POL00055203 and POL00057602. I have not had sight of these documents before. Reference is made to my letter dated the 8th July 2009 at POL00052029. This is in fact a letter from Mr Singh to Richard Nelson solicitors.
127. As stated, I had no involvement in these proceedings so cannot reflect on the way the investigation and prosecution of Susan Rudkin was conducted or the outcome of the case.

General

128. Save for the prosecution of Carl Page I did not advise on POL cases from 2006 onwards. I was not aware of any issues impacting Horizon at the time that I had conduct of POL cases. Had I been aware that there were bugs,

defects or any faults in Horizon then clearly a challenge to the integrity of Horizon in one case would be relevant to other ongoing or future cases. It is now clear that Horizon was not the robust system it was held out to be. In my view no proceedings should have been started unless the Post Office were able to prove that those bugs, defects or faults could not have impacted on the operation of Horizon i.e that the evidence being relied on was reliable.

129. There are no other matters that I would like to draw to the attention of the Chair.

Statement of Truth

I believe the content of this statement to be true.

Signed: **GRO**

Dated: 15th October 2023.

Index to First Witness Statement of Deborah Stapel

No.	URN	Document Description	Control Number
1	POL00030659	Post Office Internal Prosecution Policy (Dishonesty), Andrew Wilson December 1997	POL-0027141
2	POL00031012	Investigation Policy Appendix 16 - Investigation and prosecution policy	POL-0027494
3	POL00039945	Investigation Policy - Interview Recording, v.4.0	POL-0036427
4	POL00039951	Investigation Policy - Notes of Interview England & Wales v3 Nov 02. Appendix 2a.	POL-0036433
5	POL00039952	Investigation Policy: Notes of Interview - Northern Ireland	POL-0036434
6	POL00030578	S02 Royal Mail Group Criminal Investigation and Prosecution Policy December 2007	POL-0027060
7	POL00104812	"Royal Mail Group Ltd Criminal Investigation and Prosecution Policy"	POL-0080444
8	POL00031011	RMG Prosecution Policy (undated) V2.1	POL-0027493
9	POL00030580	Post Office Ltd - Security Policy: Fraud Investigation and Prosecution Policy v2	POL-0027062
10	POL00030579	Post Office Ltd Financial Investigation Policy, May 2010	POL-0027061
11	POL00026573	RMG Procedures & Standards - Proceeds of Crime Act 2002 & Financial Investigations doc 9.1 V1	POL-0023214
12	POL00031008	RMG Ltd Criminal Investigation and Prosecution Policy v1.1 November 2010	POL-0027490
13	POL00030598	Royal Mail Prosecution Decision Procedure	POL-0027080

14	POL00104853	Post Office's Financial Investigation Policy	POL-0080485
15	POL00104855	Post Office Ltd. Anti-Fraud Policy	POL-0080487
16	POL00030685	Royal mail Group Prosecution Policy, v3.0, April 2011 - Rob Wilson (Head of Criminal Law Team)	POL-0027167
17	POL00030800	RMG Policy - Prosecution (S3) Version 3.0	POL-0027282
18	POL00031034	Post Office Prosecution Policy V1	POL-0027516
19	POL00104929	"Post Office Limited: Internal Protocol for Criminal Investigation and Enforcement (with flowchart)"	POL-0080561
20	POL00105226	Undated Appendix 1 - POL Criminal Investigations and Enforcement Procedure (flowchart)	POL-0080851
21	POL00104747	Investigation Policy: Casework Management (England & Wales) v1.0	POL-0080387
22	POL00104777	Investigation Policy: Casework Management (England & Wales) v4.0	POL-0080417
23	POL00118096	Email from Andrew Wise to Michael Stanway forwarding an email re Casework Compliance	VIS00012685
24	POL00118108	Appendix 1 - Case Compliance checklist. Undated (date taken from parent email)	VIS00012697
25	POL00118109	Appendix 2 - File construction and Appendixes A, B and C: "Compliance Guide: Preparation and Layout of Investigation Red Label Case Files" Undated - date taken from parent email	VIS00012698
26	POL00118101	Appendix 3 - Offender reports and Discipline reports: "Compliance Guide to the Preparation and Layout of Investigation Red Label Case Files" - undated (date taken from parent email)	VIS00012690

27	POL00118102	Appendix 4 - Offender reports layout: "POL template Offender Report (Legal Investigation)" - undated (date taken from parent email)	VIS00012691
28	POL00118103	Appendix 5 - Discipline reports layout: "POL template Offender Report (Personnel Investigation)" - undated (date taken from parent email)	VIS00012692
29	POL00118104	Appendix 6 - Identification codes (undated - date taken from parent email)	VIS00012693
30	POL00118105	Appendix 7 - Tape Interviews. "POL Security Operations Team guide: Summarising of Tape Recorded Interviews." Undated - date taken from parent email	VIS00012694
31	POL00118106	Appendix 8 - Notebooks: Guidance on using notebooks in investigations. Undated (date taken from parent email)	VIS00012695
32	POL00118107	Appendix 9 - Case Progression Toolkit. Undated (date taken from parent email)	VIS00012696
33	POL00029169	ICL Pathway Conducting Audit Data Extractions at CSR Process (v1)	POL-0025651
34	FUJ00152176	Conducting Audit Data Extractions at Live - ICL Pathway Ltd - v2.0	POINQ0158370F
35	POL00093900	Fax from Manish Patel to Custody Sergeant re John Whitehouse - Release from bail on 2 June 2003.	POL-0094022
36	POL00093930	Carl Page Case Study: Email from Deborah Helszajn to Manish Patel re Relating to Carl Page	POL-0094052
37	POL00093933	Carl Page case study: Letter from Andrew Broome to Debbie Helszajn re R v Carl Page, Stafford Crown Court.	POL-0094055
38	POL00093910	Internal POL memo from Manish Patel to Deborah Helszajn re: POST OFFICE Ltd v PAGE & WHITEHOUSE	POL-0094032

39	POL00093931	Internal memo from Manish Patel to Deborah Helszajn re Post Office Ltd v Page & Whitehouse - Further documentation	POL-0094053
40	POL00094100	Letter from Debbie Helszajn to Frisby & Co Solicitors re H M Customs & Excise investigation	POL-0094222
41	POL00067072	Letter from Debbie Helszajn to Messrs Frisby & Co Solicitors for the attention of Andrew W Broome re: Regina v Carl Adrian Page Stafford Crown Court - Trial - 4 January 2005	POL-0063551
42	POL00067074	Letter from Debbie Helszajn to Messers JMW Solicitors. Re: Regina v Carl Adrian Page Stafford Crown Court - Trial - 4th Jan 2005	POL-0063553
43	POL00067082	Letter from Debbie Helszajn to Messrs Frisby & Co re: Regina v Carl Page Stafford Crown Court Trial - 4th January 2005	POL-0063561
44	POL00093928	Internal memos between Manish Patel to Deborah Helszajn re Post Office Ltd v Page & Whitehouse. SIMS/6299.	POL-0094050
45	POL00067116	Memo chain from Deborah Helszajn to Lisa Baddevithana Re R v Page	POL-0063595
46	POL00067114	Memo from Deborah Helszajn (Royal Mail) to Lisa Baddevithana Re disclosure in R v Page	POL-0063593
47	POL00067085	Electronic Memo and email chain from Lisa Baddevithana to Deborah Helszajn RE: Request for updated schedules for statements and exhibits (Carl Page)	POL-0063564
48	POL00067089	Letter from Debbie Helszajn on behalf of legal services to Frisby & Co solicitors Re R v Carl Page	POL-0063568
49	POL00067090	Letter from Debbie Helszajn to Frisby & Co solicitors Re R v Carl Page	POL-0063569

50	POL00067088	Letter from Andrew Broome to Debbie Helszajn re: R v Carl Page Stafford Crown Court	POL-0063567
51	POL00067087	Letter from Debbie Helszajn to Messrs Frisby & Co Solicitors for the attention of Andrew W Broome re: Regina v Carl Adrian Page Stafford Crown Court - Trial - 4 January 2005	POL-0063566
52	POL00067095	Letter from Debbie Helszajn (Royal Mail) to Andrew W Broome of Frisby & Co Solicitors enquiring about expert report, proposed jury bundle and amendments to the interviews - R v Carl Edward Page	POL-0063574
53	POL00067093	Memo from Deborah Helszajn to Lisa Baddevithana Re R v Carl Page	POL-0063572
54	POL00067097	Letter from Andrew Broome of Frisby & Co Solicitors to Debbie Helszajn Re R v Carl Page	POL-0063576
55	POL00067099	Letter from Debbie Helszajn to Andrew W Broome of Frisby & Co Solicitors Re R v Carl Adrian Page	POL-0063578
56	POL00067104	Memo from Tom Cleary to Debbie Helszajn, RE: Interview Tapes and Transcripts (R v. Page)	POL-0063583
57	POL00067108	Letter from Debbie Helszajn to Frisby & Co Solicitors Re R v Carl Adrian Page and John Edward Whitehouse	POL-0063587
58	POL00067109	Letter from Tom Cleary of Frisby & Co Solicitors to Debbie Helszajn Re R v Carl Page	POL-0063588
59	POL00067110	Letter from Tom Cleary of Frisby & Co Solicitors to Debbie Helszajn of Royal Mail Re R v Carl Page	POL-0063589
60	POL00067081	Letter from Andrew Broome to Debbie Helszajn re: R v Carl Page Stafford Crown Court	POL-0063560
61	POL00067084	Carl Page case study: Letter from Debbie Helszajn to Messrs Frisby & Co for the attention of Andrew W	POL-0063563

		Broome re: Regina v Carl Page Dudley Crown Court	
62	POL00066545	Carl Page Study: Letter from Post Office to Messrs Frisby & Co containing Mr Page Evidence transcript.	POL-0063024
63	POL00053309	Carl Page case study: Memo from Debbie Helszajn to POL Investigation Team re: Regina v Carl Adrian Page - Report on Final Result	POL-0049788
64	POL00066519	Memo from Debbie Helszajn to Investigation Team Post Office re: Regina v Carl Adrian Page report on final result Case 6299	POL-0062998
65	POL00093908	Case File Events Log - Rugeley MPSO, SPM Mr Carl Page	POL-0094030
66	POL00093702	Transcript of Police Station Interview of Carl Adrian Page on 14/01/2003. Tape 2	POL-0093824
67	POL00093701	Transcript of Police Station Interview of Carl Adrian Page on 14/01/2003. Tape 3	POL-0093823
68	POL00093703	Record of Tape Recorded Interview of Carl Adrian Page	POL-0093825
69	POL00093760	Transcript of tape recorded interview of Carl Page. Interviewed by Manish Patel and Colin Price (17:18 start time)	POL-0093882
70	POL00093759	Carl Page Case Study: Transcript of tape recorded interview of Carl Page. Interviewed by Manish Patel and Colin Price.	POL-0093881
71	POL00093758	Transcript of tape recorded interview of Carl Page. Interviewed by Manish Patel and Colin Price.	POL-0093880
72	POL00065034	Case Summary - R -v- Carl Adrian Page and John Edward Whitehouse in the Crown Court at Stafford	POL-0061513

73	FUJ00122250	Andy Paul Dunks' witness statement (v.3)	POINQ0128464F
74	POL00093714	Carl Page Case Study - Witness statement of Glyn Burrows (Audit Manager), version 3.0 11/02	POL-0093836
75	POL00093733	Carl Page (WITN0151) case study. Witness Statement of Mr Kevin Orgill RE: Rugeley PO branch investigations.	POL-0093855
76	POL00093897	Witness statement of Deborah Edwards.	POL-0094019
77	POL00093755	Witness Statement of Manish Patel.	POL-0093877
78	POL00093868	The Queen v Carl Page and John Whitehouse - Notice of Additional Evidence.	POL-0093990
79	POL00066551	Carl Page Case Study: Witness Statement of Sarah Jane Boardman, Mrs Elaine Lievesley, Mark Irvin, Michael Joseph Cooksey, Mr Steve Geraty, James Gerard Coney, Mrs Shirely Brocklehurst, Mrs Mary Elizabeth Peet, Mr Douglas Paul Brown, Mr Stephen Charles Cartwright, Mrs Gwen Talbot, Pippa Barker, Andrew Wood, Barry Jamieson, Colin Richard Price and Manish Patel.	POL-0063030
80	POL00062201	Expert Accountant's Report of David Liddell 2005, R-V-Carl Adrian Page	POL-0058680
81	POL00061214	Between Regina and Carl Adrian Page Report to the Court prepared by T Taylor, a Director in KPMG LLP.	POL-0057693
82	POL00067005	Carl Page case study: Evidence of Karl Adrien Page (R v Page and another) before Judge W Wood	POL-0063484
83	POL00045921	Letter from DC Deans to Staffordshire police regarding John Whitehouse dated 7/5/2003.	POL-0042400

84	POL00045867	Expert Accountant's Report of David Liddell In the Crown Court at Dudley - R v Carl Adrian Page	POL-0042346
85	POL00045868	R v Carl Adrian Page, Expert Accountant's Report of David Liddell	POL-0042347
86	UKGI00012306	Carl Page case study: Regina and Carl Adrian Page Defence Statement	UKGI023102-001
87	POL00113278	Approved Judgment between Josephine Hamilton & Others and Post Office Limited	POL-0110657
88	POL00068926	Audit report of Rainham Road Post Office (FAD098941X) by Deepak Valani	POL-0065405
89	POL00044360	Theft/False Accounting report - Oyeteju Adedayo	POL-0040839
90	POL00066742	Transcribed note on Oyeteju Adedayo Interview	POL-0063221
91	POL00066745	Transcript of Oyeteju Adedayo Interview - Tape 2	POL-0063224
92	POL00064797	Internal Memo from Darryl Owen to Criminal Law team recommending prosecution be pursued (Oyeteju Adedayo)	POL-0061276
93	POL00044361	Memo from Debbie Helszajn to Ms Natasha Bernard regarding prospect of conviction in Post Office Ltd v Oyeteju Adedayo case	POL-0040840
94	POL00052904	Internal memo from Terry Crowther to Natasha Bernard, RE: Solicitors Advice on Prosecution and Schedule of Charges (Oyeteju Adedayo)	POL-0049383
95	POL00052916	Letter from Natasha Bernard to Debbie Helszajn, RE: Oyeteju Adedayo Summons	POL-0049395
96	POL00052910	Memo letter from Debbie Helszajn to Natasha Bernard Re Post Office Ltd v Oyeteju Adedayo Case POLTD/0506/0336	POL-0049389

97	POL00044363	Notification of proceedings to police - Oyeteju Adedayo - False accounting	POL-0040842
98	POL00044364	Notification of proceedings to Police - Oyeteju Adedayo - False accounting	POL-0040843
99	POL00044367	Schedule of charges for Oyeteju Adedayo in Post Office Ltd v Oyeteju Adedayo	POL-0040846
100	POL00052911	Memo from Debbie Helszajn (Royal Mail) to Investigation Team Post Office Ltd Re Post Office Ltd v Oyeteju Adedayo - Pleaded guilty, on notice of compensation	POL-0049390
101	POL00044362	Oyeteju Adedayo case study - Memo from Phil Taylor to the Post Office Investigation Team regarding Regina v Oyeteju Adedayo	POL-0040841
102	POL00052588	Letter from Michael F Matthews to Stephens and Sons Solicitors, RE: Mrs Oyeteju Adedayo	POL-0049067
103	POL00044365	Form NPA 03 1/97 - Notification of disposal to police - Oyeteju Adedayo	POL-0040844
104	POL00047897	Oyeteju Adedayo Case Study - Financial Investigation Events Log, Case Number: FI 0506 0336	POL-0044376
105	POL00044370	Statement of information relevant in accordance with section 16 (6) of the proceeds of Crime Act 2002 Regina v Oyeteju Adedayo	POL-0040849
106	POL00047865	Financial Investigation Document Schedule FI 0506 0336	POL-0044344
107	POL00052907	Memo from Phil Taylor to Investigation Team Post Office Ltd, RE: R v Oyeteju Adedayo, Maidstone Crown Court	POL-0049386
108	POL00044358	Memorandum for the information of the accused - Oyeteju Adedayo	POL-0040837
109	POL00052902	Antecedents form for Oyeteju Adedayo	POL-0049381

110	INQ00001039	Transcript (21/02/2022): Post Office Horizon IT Inquiry - John Dickson [WITN0166], Pauline Thomson [WITN0258], Timothy Burgess [WITN0187], Siobhan Sayer [WITN0183] and Oyeteju Adedayo [WITN0178]	INQ00001039
111	POL00046550	Audit report from Paul Field to Glenn Chester re Audit of Post Office Ibstock, Branch Code 223217	POL-0043029
112	POL00045243	Handwritten statement in re to subpostmaster debt recovery (undated - date estimated from audit date) Susan Rudkin	POL-0041722
113	POL00045246	Handwritten note re: Interview at Ibstock Post Office	POL-0041725
114	POL00050026	Record of tape recorded interview of Susan Jane Rudkin dated 20/8/08.	POL-0046505
115	POL00050123	Email from Mike Wilcox to Williamson and finance investigation in re to Susan Rudkin	POL-0046602
116	POL00046485	Investigation report in re to theft/money laundering in re to Susan Jane Rudkin	POL-0042964
117	POL00046576	Antecedents in re to Susan Jane Rudkin	POL-0043055
118	POL00046488	Susan Rudkin case study: Memo in re to Jarnail Singh to Fraud team post office limited and Mole Willcox in re to ' Post office limited v Susan Jane Rudkin dated 3/10/2008.	POL-0042967
119	POL00045220	Schedule of charges - Post Office Limited v Susan Jane Rudkin	POL-0041699
120	POL00050347	Email from David Pardoe to Fraud Team Post Office, RE: DAM Authority-Susan Jane Rudkin Ibstock	POL-0046826
121	POL00046505	Letter from Mike Wilcox to Jarnail Singh in re to Susan Jane Rudkin	POL-0042984

122	POL00046506	Memo from Jarnail Singh to Fraud team post office in re to Susan Jane Rudkin	POL-0042985
123	POL00046537	Susan Rudkin case study: Summons, Hinckley magistrates court in re to Susan Jane Rudkin.	POL-0043016
124	POL00051256	Letter from Debbie Helszajn to Fraud Team Post Office Limited c.c. Mike Wilcox re: REGINA v SUSAN JANE RUDKIN	POL-0047735
125	POL00051248	Memo from Debbie Helszajn to Fraud Team Post Office Limited c.c. Mike Wilcox, Ged Harbison and Press Office RE: R v Rudkin (Guilty Plea to theft on 23 March 2009)	POL-0047727
126	POL00051250	Memo from Debbie Helszajn to Mr John Dove re: REGINA v SUSAN JANE RUDKIN	POL-0047729
127	POL00051252	Letter from Debbie Helszajn to The Chief Clerk re: REGINA v SUSAN JANE RUDKIN	POL-0047731
128	POL00060416	Susan Rudkin case study: Letter from Mr EM Rudkin to Paul Hemley Re: Suspense account	POL-0056895
129	POL00061521	Letter from Paul Hemley to E M Rudkin re: Suspense account query	POL-0058000
130	POL00065265	Susan Rudkin case study: Incident Report for Ibstock Post Office Branch	POL-0061744
131	POL00051044	Email from Jarnail A Singh to Tahira Rasool in re to Michael and Susan Rudkin (Ibstock) Leicester post office.	POL-0047523
132	POL00059762	Email from Glenn Chester to Sarah Howards, Re: Urgent Advice needed-Flag Case FCT728	POL-0056241
133	POL00044916	Letter from Mr Michael Rudkin to POL re: Requesting withdrawal of suspension & prosecution	POL-0041395

134	POL00060421	Letter from E M Rudkin to Mr Goerge Thomson re: Private, In the Strictest Confidence and without Prejudice.	POL-0056900
135	POL00050242	Restraint Order Prohibiting Disposal of Assets - Susan Jane Rudkin	POL-0046721
136	POL00051380	Susan Rudkin case study: Memo from Rob Wilson to Fraud Team cc Mike Wilcox, Ged Harbinson and Press Office re: R v Susan Jane RUDKIN - report on final result	POL-0047859
137	POL00052020	STATEMENT OF INFORMATION RELEVANT IN ACCORDANCE WITH SECTION 16 (3) OF THE PROCEEDS OF CRIME ACT 2002, REGINA V SUSAN JANE RUDKIN	POL-0048499
138	POL00052094	STAFFORD CROWN COURT - CONFISCATION HEARING - 21st AUGUST 2009, THE QUEEN v SUSAN JANE RUDKIN, BRIEF TO COUNSEL FOR THE PROSECUTION	POL-0048573
139	POL00055156	Letter from Charlotte Knight to Mr Singh, Re: R v Susan Jane Rudkin- Outstanding Confiscation Order- 29.894.15 Deadline for payment Wednesday 18 August 2010	POL-0051635
140	POL00055203	Letter from Jarnail Singh to Charlotte Knight, re: Regina v Susan Jane Rudkin Outstanding Confiscation Order	POL-0051682
141	POL00057602	Financial Investigation Events Log, POLTD/0809/0101 Susan Rudkin	POL-0054081
142	POL00052029	Letter from Jarnail Singh to Messrs Richard Nelson Solicitors re: Regina v Susan Jane Rudin Stafford Crown Court Confiscation Hearing - 21st August 2009	POL-0048508