

Thursday, 30 November 2023

1
2 (10.30 am)
3 **MR BEER:** Good morning, sir, can you see and hear
4 us?
5 **SIR WYN WILLIAMS:** Yes, I can.
6 **MR BEER:** Thank you very much.
7 **SIR WYN WILLIAMS:** Before you call Mr Singh to give
8 evidence, Mr Beer, I'd like to say a few words.
9 Many of you will know from reports in the
10 media that a former subpostmaster and Core
11 Participant, Mr Thomas Brown, recently passed
12 away. Mr Brown began his career as
13 a subpostmaster in 1979 or 1980. He was based
14 in the northeast of England and, over very
15 nearly 30 years, he managed and owned Post
16 Office branches in that area very successfully.
17 An audit in 2008 purported to show a very
18 large shortfall. That alleged shortfall was
19 based upon data produced by Horizon. Mr Brown
20 was suspended and shortly thereafter his
21 contract with the Post Office was terminated.
22 In due course, Mr Brown was declared bankrupt.
23 The Post Office began criminal proceedings
24 against Mr Brown which reached the Crown Court.
25 However, my understanding is that the Post

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1 anything but I imagine that their grounds for
2 becoming Core Participant are compelling,
3 Mr Beer.

4 **MR BEER:** Thank you, sir.

5 Can I call Jarnail Singh, please.

6 **JARNAIL SINGH (sworn)**

7 **Questioned by MR BEER**

8 **MR BEER:** Please do take a seat, Mr Singh.

9 **THE WITNESS:** Thank you very much.

10 **SIR WYN WILLIAMS:** Before Mr Beer asks you any
11 questions, Mr Singh, I think it appropriate to
12 address you as follows. Under our law,
13 a witness at a public Inquiry has the right to
14 decline to answer a question put to him by
15 Counsel to the Inquiry, by any recognised legal
16 representative or by me, if there is a risk that
17 the answer to that question would incriminate
18 the witness. This legal principle is known in
19 shorthand form as the privilege against
20 self-incrimination.

21 Mr Singh, fairness demands that I remind you
22 of that principle before you give your evidence.
23 If at any stage you wish to rely on the
24 privilege, it is for you to make that clear to
25 me in respect of any question put to you, ie you

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1 Office came to realise that there was no
2 realistic prospect of successfully convicting
3 Mr Brown of any criminal offence and,
4 accordingly, before the trial date, no evidence
5 was offered and Mr Brown was acquitted.

6 Mr Brown was a claimant in the Group
7 Litigation. He received a modest amount of
8 compensation as a consequence of that litigation
9 and I understand that, much more recently, he
10 received an interim payment under the Group
11 Litigation compensation scheme. However,
12 Mr Brown's compensation award under that scheme
13 had not been finalised prior to his death.

14 The Inquiry Team and I would like to extend
15 our deepest sympathies to Mr Brown's family and
16 friends. From all I have read and heard about
17 Mr Brown, he will be greatly missed.

18 Thank you, Mr Beer.

19 **MR BEER:** Thank you sir, I know that Mr Brown's
20 family couldn't be here today to hear you say
21 that but they are watching, each of them, from
22 the northeast, in Newcastle, and I think, in due
23 course, they're to apply to become Core
24 Participants in the Inquiry.

25 **SIR WYN WILLIAMS:** Well, one can never be certain of

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1 must tell me that you wish to rely upon the
2 privilege against self-incrimination.

3 If, therefore, any questions are put to you
4 by any of the lawyers who ask you questions or
5 by me which you do not wish to answer, on the
6 grounds that to answer such questions might
7 incriminate you, you must tell me immediately
8 after any such question is put. At that point,
9 I will consider your objection and, thereafter,
10 rule upon whether your objection should be
11 upheld.

12 I understand from Mr Beer that you are
13 represented here today by a solicitor. No
14 doubt, if the issue relating to
15 self-incrimination arises, the solicitor will
16 assist you and, if at any stage during the
17 questioning, you wish to consult your lawyer
18 about the privilege against self-incrimination,
19 you must tell me so that I can consider whether
20 that is appropriate.

21 Do you understand all that, Mr Singh?

22 **THE WITNESS:** I do, sir. I'm very grateful. Thank
23 you.

24 **SIR WYN WILLIAMS:** Thank you very much.

25 Over to you, Mr Beer.

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1 **MR BEER:** Thank you, sir.
 2 My name is Jason Beer and I ask questions on
 3 behalf of the Inquiry. Can you give us your
 4 full name, please?
 5 **A.** Jarnail Singh.
 6 **Q.** Thank you very much for coming to give evidence
 7 to the Inquiry today and tomorrow and for
 8 previously providing a witness statement to us.
 9 You should have a copy of that witness
 10 statement --
 11 **A.** I've got it here, yes.
 12 **Q.** -- in front of you. Thank you. It's 89 pages
 13 in length, excluding the indexes to the exhibits
 14 and it's dated 6 October. For the transcript,
 15 the URN is WITN04750100.
 16 **A.** Yes.
 17 **Q.** If you turn to the 89th page, please, is that
 18 your signature?
 19 **A.** That is my signature but I think we discussed
 20 before, I need to amend a few paragraphs.
 21 **Q.** Yes, before I ask you whether the contents are
 22 true to the best of your knowledge and belief,
 23 I think there are a series of corrections you'd
 24 like to make?
 25 **A.** Yes, please.

5

1 recall this meeting or ever discussing Gareth
 2 Jenkins' witness statement with him. As far as
 3 I recall, I had very limited involvement with
 4 Mr Jenkins. I cannot recall any discussions
 5 where he was informed of his duties to the
 6 Court, although I would have assumed Counsel
 7 would have informed him of the same."
 8 Which is the correction or clarification
 9 that you would like to make?
 10 **A.** The only word there is "very limited", and that
 11 can go. That can be:
 12 "I had more involvement with Mr Gareth
 13 Jenkins."
 14 **Q.** Sorry, so the sentence which says, "As far as
 15 I recall I had very limited involvement with
 16 Mr Jenkins" --
 17 **A.** I had more --
 18 **Q.** Hold on. Mr Singh, if you let me ask the
 19 question first --
 20 **A.** Sorry.
 21 **Q.** -- then when I finish speaking, if you start
 22 speaking --
 23 **A.** Yes, let me know.
 24 **Q.** So the sentence which says, "As far as I recall
 25 I had very limited involvement with Mr Jenkins",

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1 **Q.** If we go to page 19, please, and paragraph 51,
 2 if that could be brought up on the screen,
 3 please. Paragraph 51, the sentence which reads:
 4 "When the matter was committed to the Crown
 5 Court, once instructed, Counsel were asked to
 6 draft the indictment and in doing so, look at
 7 the summons, and also provide advice on
 8 evidence. Essentially they would revisit and
 9 review the whole case."
 10 **A.** Yes.
 11 **Q.** What's the correction you'd like to make to
 12 that?
 13 **A.** Just to add a paragraph just to clarify, I think
 14 for you and anybody who wants to have a look at
 15 this statement, is that if we can add:
 16 "After counsel has been instructed, the case
 17 papers are passed on or passed on to the legal
 18 executives to manage and progress the case in
 19 the Crown Court."
 20 That's all.
 21 **Q.** Thank you. Can we turn to page 25, please. On
 22 paragraph 70. This reads:
 23 "[A document] references a meeting which
 24 I attended with Gareth Jenkins, Warwick Tatford
 25 and Jon Longman in October 2010. I do not

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1 what is the amendment you would like to make --
 2 **A.** Well --
 3 **Q.** Hold on.
 4 **A.** I was looking at you --
 5 **Q.** What is the amendment you would like to make to
 6 that?
 7 **A.** That should read:
 8 "As far as I recall, I had more or greater
 9 involvement with Mr Jenkins."
 10 **Q.** So the opposite to what it says?
 11 **A.** Yes.
 12 **Q.** Is that right?
 13 **A.** Yes.
 14 **Q.** The third correction, please, page 26,
 15 paragraph 76, which is at the foot of the page.
 16 It reads:
 17 "My understanding is that when
 18 a subpostmaster was found guilty, repayment
 19 directions were given by the Court. Counsel
 20 would forward these to [the Criminal Law Team]
 21 who would make sure they were complied with by
 22 the Defence. If enforcement proceedings were
 23 needed because the directions were not complied
 24 with, the Investigation and Security Team would
 25 approach us and we would make the appropriate

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1 application to the Court. To clarify, this was
 2 before the separation of the businesses. When
 3 the businesses separated, enforcement
 4 proceedings were dealt with by [Cartwright
 5 King]."

6 What's the correction or clarification you'd
 7 like to make there?

8 **A.** Just give me a second.

9 Yes, where it says, "Counsel would forward
 10 these to CLT", if we delete -- if we add there
 11 something to the effect of:

12 "... and these were copied on to the
 13 Investigation and Security Team."

14 **Q.** Thank you.

15 **A.** And I think if you delete -- so it should read:

16 "My understanding is that where the
 17 subpostmaster is found guilty repayment
 18 directions were given by the Court. Counsel
 19 would put forward these to CLT who would in turn
 20 copy this to the Investigation and Security Team
 21 ..."

22 And if we can then --

23 "... who would make sure they were complied
 24 with by the Defence ..."

25 *(The witness read to himself)*

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1 What's the correction or clarification --

2 **A.** Ah -- I think that's where --

3 **Q.** -- hold on.

4 **A.** Sorry, I should be looking at you. Sorry.

5 **Q.** What's the correction or clarification that you
 6 would like to make to that, please?

7 **A.** I think that should be:

8 "I had more contact with Mr Jenkins ..."

9 **Q.** So it should read:

10 "I had more contact with Mr Jenkins" --

11 **A.** I had, yeah, something --

12 **Q.** -- and "am" or "am not" in a position to
 13 comment?

14 **A.** Um ... I think that's -- yeah, I think that'll
 15 be fine, I think --

16 **Q.** That should stay. So it's:

17 "I had more contact with Mr Jenkins ..."

18 **A.** Yeah.

19 **Q.** Okay. With those four corrections brought into
 20 account, are the contents of that witness
 21 statement true to the best of your knowledge and
 22 belief?

23 **A.** Yes. Yes, it is.

24 **Q.** Thank you. A copy of that witness statement is
 25 going to be uploaded to the Inquiry's website

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1 I think that's fine. That's fine.

2 **Q.** So it was the enforcement team who would made
 3 they were complied the with by the defence --

4 **A.** Yes.

5 **Q.** -- not the Criminal Law Team?

6 **A.** Yes.

7 **Q.** Is that the effect of the amendment you want to
 8 make?

9 **A.** Yes.

10 **Q.** So it should read:

11 "Counsel would forward these to the Criminal
 12 Law Team and the Enforcement Team, the latter of
 13 whom would make sure they were complied with by
 14 the defence."

15 **A.** Yes.

16 **Q.** Thank you. Then lastly page 67, paragraph 200.
 17 Towards the bottom of the page --

18 **A.** Oh.

19 **Q.** -- it reads:

20 "I had limited contact with Mr Jenkins and
 21 am not in a position to comment on any views
 22 that he expressed in relation to the disclosure
 23 being sought by the Defence and the relevance of
 24 the material sought to the case. His main point
 25 of contact was Jon Longman."

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1 and I'm not going to ask you about every part of
 2 it; do you understand?

3 **A.** Yes.

4 **Q.** That can come down, thank you. You've come
 5 today to assist the Inquiry with the issues
 6 arising in Phase 4 of the Inquiry, that is the
 7 investigation and prosecution of subpostmasters
 8 for criminal offences. We're going to ask you
 9 to return kindly next year to give evidence
 10 about the issues in Phases 5 and 6 of the
 11 Inquiry, and that includes: your interactions
 12 with Simon Clarke; your interactions with
 13 Cartwright King more generally; the
 14 circumstances in which Mr Clarke's shredding
 15 advice came to be written; your involvement with
 16 the Second Sight reviews; your communications
 17 with Susan Crichton and other senior members of
 18 the Post Office, Chris Aujard as well and Brian
 19 Altman KC.

20 I'm not going to ask you about those matters
 21 today although some of the documents I'm going
 22 to refer you to touch on Phase 4 issues, even
 23 though they were created in 2012, 2013 and 2014.

24 Can I start please with your professional
 25 background. In your witness statement,

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1 paragraphs 6, 7 and 8, which is on page 3 -- no
2 need to display it for the moment -- you
3 describe your roles within the Royal Mail Group
4 and within Post Office Limited and you exhibit
5 a copy of your CV, your curriculum vitae,
6 setting out your qualifications and your career.

7 Can I summarise it, those two sources --
8 paragraphs 6, 7 and 8 and the CV -- as follows,
9 and tell me whether I get it right:

10 Firstly, is it right that between 1985 and
11 1989 you were a legal executive in private
12 practice and that involved work in two firms.
13 In the latter firm you worked in conveyancing,
14 buying and selling houses.

15 **A.** Yes.

16 **Q.** You joined the Post Office as a legal executive
17 in December 1989 and, again, you worked in
18 conveyancing, specifically in the Post Office's
19 commercial conveyancing department?

20 **A.** Yes, I did.

21 **Q.** Whilst you were working for the Post Office you
22 were admitted as a solicitor in December 1992;
23 is that right?

24 **A.** That's right, yes.

25 **Q.** Does that mean that you were studying for your

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1 Prosecutions Department?

2 **A.** When I joined? No, I think I -- I think I --
3 the structure of the team was, I think, there
4 was the Head of Criminal Law Team --

5 **Q.** Sorry, say that again?

6 **A.** There was -- the structure of the Prosecutions
7 Department when I joined, was that there were
8 head -- Head of the Criminal Law Team.

9 **Q.** Who was that?

10 **A.** That was Mike Heath, and then you'd eight senior
11 lawyers on the same position, I think they were,
12 then you had three or four legal executives,
13 three or four admin staff, and four or five
14 secretaries.

15 **Q.** I see.

16 **A.** So --

17 **Q.** It's just in your CV, if we can have it up on
18 the screen, WITN04750101, thank you. If we look
19 at the second page, look at foot of the page, do
20 you see the last paragraph where it says:

21 "In August 1995 I transferred to the
22 Prosecution Division as the senior lawyer ..."

23 **A.** No, well, maybe "the" need to come out. I think
24 we were all on the same grade, basically. Some
25 more experienced than others but they were all

15

1 Law Society finals whilst you were working in
2 the Conveyancing Department?

3 **A.** Yes, yes I was, yes.

4 **Q.** Then in September 1993 you transferred to the
5 Post Office's Litigation Department; is that
6 right?

7 **A.** That's right, yes.

8 **Q.** That was handling civil work; is that correct?

9 **A.** No, no, the -- yeah, that was the Civil
10 Litigation Department before I joined the
11 Prosecution Department.

12 **Q.** So you transferred to the Litigation Department
13 in September 1993 --

14 **A.** '90 --

15 **Q.** -- and worked on civil work --

16 **A.** Civil work, yes.

17 **Q.** Then in August 1995 you transferred to the
18 Prosecutions Department?

19 **A.** That's right, yes.

20 **Q.** You tell us in your CV that upon transfer to the
21 Prosecutions Department, you were the senior
22 lawyer in the Prosecutions Department; is that
23 right?

24 **A.** Yes, yes, I was, yes.

25 **Q.** Was there only one senior lawyer in the

14

1 known as senior lawyers and I think subsequently
2 they changed the titles.

3 **Q.** So where it says, "the senior lawyer", that's
4 a bit misleading, isn't it?

5 **A.** Possibly.

6 **Q.** So that should be "as one of eight senior
7 lawyers and there wasn't any other grade, we
8 were all senior lawyers"?

9 **A.** Yes, I think so. I think --

10 **Q.** Okay. Did that remain the case that you were
11 one of the senior lawyers --

12 **A.** Yes.

13 **Q.** -- until separation in 2012?

14 **A.** I don't know. Subsequently, there were various
15 structures, there were various roles, name
16 changes, to principal and principal lawyers and
17 team leaders, and all sorts of things like that.
18 But, generally, we were the same grade doing
19 more or less the same work.

20 **Q.** Okay. That can come down. Thank you.

21 Did you manage other lawyers.

22 **A.** No, no, I don't think any of us did, apart from
23 the team leader or the, you know, the Head of
24 Criminal Law. I think they managed -- I don't
25 think anybody actually managed anybody else,

16

1 apart from the legal executive and they
 2 basically assisted you, they worked with you,
 3 rather than sort of managed them as such,
 4 because they were experienced.
 5 **Q.** So when the name "senior lawyer" got changed to
 6 "Team Leader", you weren't in fact leading
 7 a team at all?
 8 **A.** I think it -- I don't think anything really
 9 changed apart from separation. On separation,
 10 obviously I was --
 11 **Q.** We're talking about before separation --
 12 **A.** No, I think there was a team leader -- or not
 13 team leader, he was the Head of Criminal Law,
 14 I think that was one grade and I think he
 15 managed and supervised everybody else.
 16 **Q.** Okay, it's just a moment ago you said the name
 17 changed from senior lawyer to Principal Lawyer
 18 to Team Leader, referring to the role you were
 19 undertaking. Did that happen before separation
 20 in 2012?
 21 **A.** No, no. Sorry, it's probably -- I'm trying to
 22 sort of adjust to the Inquiry's -- yeah, there
 23 was the -- the -- yeah, sorry. Let me clarify.
 24 There was the Head of Criminal Law Team, he
 25 managed, basically, the senior lawyers, and

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1 I worked very closely with one of the senior
 2 partners in the firm, the first firm I joined,
 3 and I did about three -- three or four years
 4 with --
 5 **Q.** That was defending though, presumably?
 6 **A.** It was defending but he did quite a bit of
 7 prosecution. I assisted with him -- I assisted
 8 him. I don't know whether it was Trading
 9 Standards, or something like that now, I mean
 10 years and years ago now, but he did something
 11 and I did a lot of preparation for him. Did all
 12 the research and everything else. But I have
 13 no -- that's right, I mean, you can say that.
 14 Certainly, that was the only experience I had of
 15 criminal law.
 16 **Q.** As a legal exec?
 17 **A.** As a legal exec, yes.
 18 **Q.** Had you done any private prosecution work?
 19 **A.** No.
 20 **Q.** Had you ever had to give advice on the Full Code
 21 Test in the Code for Crown Prosecutors?
 22 **A.** Prior to --
 23 **Q.** Prior to joining as a senior lawyer in August
 24 1995?
 25 **A.** No.

19

1 I think the Principal --
 2 **Q.** Sorry, he managed the senior lawyers?
 3 **A.** He managed all the team, basically, yeah the
 4 legal executives, the secretaries, the admin,
 5 and also the, you know, the lawyers. That's
 6 basically it. He was the head of the team,
 7 and --
 8 **Q.** So from August '95 until separation in 2012, you
 9 remained the same grade --
 10 **A.** Yeah --
 11 **Q.** -- senior lawyer --
 12 **A.** More or less, yes.
 13 **Q.** More or less or, in fact, the same?
 14 **A.** Yeah, nothing changed for me, no.
 15 **Q.** At the time you became the senior lawyer you
 16 were, I think, by my calculations, two years and
 17 eight months qualified; is that right?
 18 **A.** Yes, I think so.
 19 **Q.** You hadn't practised in criminal law whilst
 20 you'd worked at the Post Office; is that right?
 21 **A.** Not with the Post Office, no.
 22 **Q.** Had you ever done any prosecution work before?
 23 **A.** In -- when I first started, I was the personal
 24 representative under the duty scheme, you know,
 25 when it came in, 1984/85, whenever it was, when

18

1 **Q.** Had you ever had to determine questions of
 2 evidential sufficiency, whether to move to
 3 a charge or a summons before?
 4 **A.** Not as a -- not on the prosecution side of it.
 5 I mean it's not anything I've looked at the
 6 evidence, taken witness statements for the
 7 senior partner -- well -- most of the
 8 preparation work was done by me.
 9 **Q.** Had you ever had to deal with whether
 10 a prosecution was in the public interest from
 11 the prosecution side?
 12 **A.** No.
 13 **Q.** Did you always report to the head of the
 14 Criminal Law Team?
 15 **A.** Well, talking about now, the Post Office
 16 prosecution?
 17 **Q.** Yes.
 18 **A.** Yes.
 19 **Q.** From August '95 --
 20 **A.** Yes --
 21 **Q.** -- to separation in 2012?
 22 **A.** -- yes, well -- well, I inherited a very small
 23 casework, but I worked very closely with the --
 24 two of the senior lawyers, very, very closely.
 25 **Q.** Who were they?

20

1 A. I worked very closely with a number -- one or
 2 two senior lawyers.
 3 Q. Yes, and who were they?
 4 A. There was Tony Brentnall and one other lady
 5 who -- Debbie Stapel.
 6 Q. Were you reporting, nonetheless, only to the
 7 Head of Criminal Law?
 8 A. I think -- I think --
 9 Q. Was he or she your line manager?
 10 A. I think -- I suppose -- yeah. Yes. I think so,
 11 yes.
 12 Q. Did that remain constant until separation in
 13 2012?
 14 A. I think it was Mike Heath originally and then
 15 when I think Rob Wilson took over, yes -- he
 16 was -- yeah.
 17 Q. So they were your line managers?
 18 A. They were the line managers, yes.
 19 Q. Where were you located?
 20 A. In, firstly, Impact House in Croydon. Then
 21 subsequently Victoria -- Eccleston Street in
 22 Victoria.
 23 Q. Were all of the lawyers located there?
 24 A. All of the prosecution team has always been
 25 together in -- you know, either in Impact House
 21

1 various guises. Then if we go to the foot of
 2 the page, please, it says April 1996 to present,
 3 "J Singh Judge Solicitors, Crawley West Sussex".
 4 A. Yes.
 5 Q. Then over the page, please:
 6 "In relation to property law, experienced in
 7 both Commercial and Residential Property Law,
 8 including Have a detailed [I think that must
 9 mean "including having a detailed"] knowledge of
 10 the Landlord and Tenant Act 1987, the Housing
 11 Act 1996" --
 12 A. Yes.
 13 Q. -- "the Leasehold Reform Housing and Urban
 14 Development Act 1993, the Land Registration Act
 15 2002 and the Commonhold and Leasehold Reform Act
 16 2002.
 17 "Acted on numerous residential conveyances
 18 in the local Crawley, Horsham and West Sussex
 19 areas, as well as lease and rental agreements
 20 for both Private and Council tenancies.
 21 Extensive experience in all property matters up
 22 to senior level dealing including the following
 23 buying and selling of residential and commercial
 24 properties [I think there are some words missing
 25 there], commercial and residential remortgage
 23

1 or Victoria.
 2 Q. Was this your full-time job?
 3 A. Yes.
 4 Q. You didn't have any other jobs?
 5 A. Well, I was -- I had a consultancy type of thing
 6 going on but that's more to do with working with
 7 somebody else to gain some other experience, but
 8 it wasn't substantive, or anything like that.
 9 It was a bit like a hobby. It would be like
 10 being monitored, you know, in a business
 11 capacity type of thing.
 12 I did a -- it was a businessman I met and he
 13 wanted me to do some work for him and he was
 14 basically acting as my mentor, and I set up
 15 a consultancy in consultation with the
 16 Law Society, and it was properly registered
 17 under the legislation, the Law Society knew
 18 about it, the Post Office knew about it, but it
 19 didn't have any impact on any other work I did
 20 for the Post Office at all.
 21 Q. Can we just look at your CV please,
 22 WITN04750101. You set out your employment
 23 history here, if we scroll down, and then if we
 24 go over the page, please, December '89 to May
 25 '15, so 26 years at the Post Office in its
 22

1 applications, transfer of equity, drafting
 2 leases, drafting commercial assignments,
 3 leases/licences, auction transactions and
 4 property litigation.
 5 "Worked with a range of clients including
 6 large and small businesses [including]
 7 acquiring, selling, leasing or developing
 8 property of all types, limited companies and
 9 limited liability partnerships and private
 10 individuals with active portfolios [then I think
 11 a full stop] Freehold commercial property
 12 acquisition and funding including the
 13 introduction of commercial lenders where
 14 appropriate.
 15 "We were an accredited Law Society
 16 Conveyancing Quality Scheme practice. Our
 17 accreditation provides [presumably that means
 18 'provided'] recognition of our adherence to good
 19 practice, management standards and commitment to
 20 providing efficient and high quality
 21 conveyancing procedures which also led to our
 22 introduction onto the panel for some major High
 23 Street Mortgage lenders."
 24 Is that all accurate, that from 1996 onwards
 25 you were doing that?
 24

1 A. Yes, it is, yes. At that time, the indemnity
 2 insurance was taken care of by the Law Society
 3 and it was practical. It worked. Yes, it did.
 4 Q. So you had two jobs?
 5 A. I didn't -- there wasn't that much work in that
 6 sense but what I did do was I worked very
 7 closely with the previous employers, referring
 8 work to them, so I -- the firm I left
 9 beforehand, and the previous firm when first
 10 I started. A lot of the work was done for the
 11 local community, more or less. They came to see
 12 me and I referred them on.
 13 It wasn't sort of a full-time job, as such,
 14 it's more or less doing the community service,
 15 like putting something back in the community,
 16 more than --
 17 Q. It looks -- I'm so sorry, I spoke over you.
 18 A. Sorry.
 19 Q. It looks like quite a lot of work?
 20 A. Well, it looks like -- on paper, it's completely
 21 different to what the reality was. The reality
 22 was that it worked for me and, instead of
 23 collecting stamps, I was able to put something
 24 back in the community. A lot of people were
 25 grateful for it, for the referral for the

25

1 A. It was, yeah -- yes, you could say that. But it
 2 didn't interfere --
 3 Q. Well, I am saying it and I'm asking you whether
 4 it's true.
 5 A. It is true. Yes. But it's -- it was true up to
 6 about year 2000/2001, and I think after that,
 7 the indemnity insurance got so much, purely
 8 because it went -- it went on the free market.
 9 Instead of £20, £30 a month, it went up to God
 10 knows what it did, and all I did then was
 11 restricted it to monitoring or mentoring --
 12 I think it is the expression -- by this
 13 businessman. I did bits and pieces for him --
 14 a bit -- you know, advised him, drafted letters
 15 and things for him because he was grateful for
 16 that.
 17 Q. You said that it is true up until 2000. If we
 18 look at the foot of the previous page, it says
 19 April '96 to present.
 20 A. Yes, presently it's true. Presently, as you
 21 know the work I've done, I'm acting as -- I'm
 22 working as a consultant for one of the firms --
 23 Q. Hold on, just stop. If we look at the next
 24 page, please, and scroll down, here, you detail
 25 what you do since you left the Post Office and

27

1 recommendations I made, and the Law Society was
 2 happy with it, because I think it was the Law
 3 Society who recommended it and I said "Look,
 4 this what I'm doing, this is my full time job,
 5 the Post Office obviously doesn't interfere,
 6 there's no conflict, but this what I want to
 7 do". And I think what they actually recommended
 8 very kindly, "Look, why don't you set it up as
 9 a consultancy? You can do both", and I think as
 10 and when the practice certificate was up for
 11 renewal --
 12 **THE STENOGRAPHER:** Sorry, can you slow down?
 13 A. As and when the practice certificate came up for
 14 renewal, it was done as a bulk renewal by the
 15 Post Office and they knew very well what I was
 16 doing, but it didn't interfere because it was,
 17 like, you know, either collecting stamps or
 18 doing something like that, which is useful to
 19 the community it was useful to me and that was
 20 a reason why I did what I had to do.
 21 Q. Is a summary of that, for the entirety of the
 22 period we were looking at, as well as being
 23 a senior lawyer in the Prosecutions Department
 24 of the Post Office, you were also in private
 25 practice?

26

1 I'm not going to ask you any questions about
 2 what you've done since you left the Post
 3 Office --
 4 A. Okay.
 5 Q. -- because that's March '16 onwards and then
 6 August 2021 onwards.
 7 A. Yes.
 8 Q. I'm asking you about this period from April 1996
 9 to the present day. You've just told us that,
 10 in fact, it was only until 2000 or 2001 that
 11 that carried on?
 12 A. Well, maybe that needs correcting or amending
 13 but, certainly, it's in existence but I don't do
 14 any work through it, purely because I don't want
 15 to do it. But I -- if I wanted to, I could do.
 16 It's there. If I want to put it into practice
 17 now, the fact is that I can't use it purely
 18 because I -- I'm inundated from a lot of
 19 paperwork from the Inquiry.
 20 So, you know, this a full-time job, dealing
 21 with the Inquiry, the questions and preparing
 22 statements and reading the documentation
 23 forwarded to me by the Inquiry. But it's in
 24 existence, any time I want to work with it I can
 25 do. It always has been and I think the Law

28

1 Society are quite happy for it to be there.
 2 I mean, there's nothing untoward in that.
 3 I mean, I don't know what's the point you're
 4 trying to make. It didn't interfere with --
 5 **Q.** I'm not making any point. I'm just letting you
 6 speak at the moment.
 7 **A.** Okay, well, you tell me what the upshot of it
 8 and I'll explain it to you.
 9 **Q.** I've asked you, is it correct that, for the
 10 entirety of the period that we're looking at, as
 11 well as being a senior lawyer in the
 12 Prosecutions Department, you were also in
 13 private practice? I think you said yes.
 14 **A.** Yes. Yes, I suppose I was. Yes.
 15 **Q.** If we scroll up this page, please. You were
 16 acting in on numerous residential conveyances in
 17 that period, correct?
 18 **A.** Correct.
 19 **Q.** You were working with large and small businesses
 20 buying and selling or leasing properties; is
 21 that correct?
 22 **A.** That's correct as well, yes.
 23 **Q.** You say this is the equivalent to having a hobby
 24 of collecting stamps?
 25 **A.** Yes.

29

1 **A.** Yes.
 2 **Q.** From 2012 onwards, from the separation of the
 3 business onwards, did you manage any other
 4 criminal lawyers within the Post Office?
 5 **A.** No. There was no other criminal lawyers there.
 6 **Q.** It was just you?
 7 **A.** Just me.
 8 **Q.** From that time onwards, from separation onwards,
 9 was the Criminal Law Team sufficiently
 10 staffed --
 11 **A.** Well --
 12 **Q.** -- ie, by you and you alone?
 13 **A.** You mean this is Post Office Limited now,
 14 1 April '12 onwards? No.
 15 **Q.** It wasn't sufficiently staffed?
 16 **A.** Well, the --
 17 **Q.** In what respect wasn't it sufficiently staffed?
 18 **A.** Well, firstly, I had no assistants. I had no --
 19 at CLT, the Criminal Law Team, before -- prior
 20 to it, I had a secretary who basically did all
 21 the typing for me because I'm not very good at
 22 IT. I had a desktop but I dictated everything
 23 to her, she put everything together and then you
 24 had the legal executives putting the bundles
 25 together for the jury, for the advance

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1 **Q.** Yes, we'll move on, thank you.
 2 In paragraph 7 of your witness statement,
 3 you say that when you transferred over to the
 4 Post Office in 2012, you were the only in-house
 5 criminal lawyer within the Criminal Law Team; is
 6 that right?
 7 **A.** That's right.
 8 **Q.** What was the reason for the Post Office reducing
 9 the number of in-house criminal lawyers?
 10 **A.** I think you'd need to ask somebody senior.
 11 I have no idea why they did that. All they did
 12 was separated the businesses and I think the --
 13 their plan, the business plan was to have one
 14 senior lawyer -- senior criminal lawyer, one
 15 commercial lawyer to head those teams and to
 16 have -- my understanding was to oversee and
 17 manage the work done by a private firm who'd
 18 done the -- tendered the work out to the private
 19 firms.
 20 I think that was their model and I fitted in
 21 with the, you know, the criminal -- criminal law
 22 aspect of it or the prosecution side of it.
 23 **Q.** So the model was to outsource the work to
 24 a firm, is that right, but to retain one lawyer
 25 in-house?

30

1 information, for the Magistrates Court.
 2 I didn't have any of that. So I basically
 3 said "Look, I can't do the job you're trying to
 4 tell me to do", so a lot of the work, basically
 5 all the work, literally from the beginning to
 6 the end of the case, went to Cartwright King.
 7 So that was the only way it worked. So the only
 8 thing I did was basically managed them and did
 9 the admin or the advice sought by the seniors
 10 within the Post Office.
 11 **Q.** Thank you. Did you complain about this?
 12 **A.** Well, I -- I don't know what you mean by
 13 complaint? I mean --
 14 **Q.** Raise a grumble, express your dissatisfaction,
 15 express annoyance or other cognate expressions?
 16 **A.** It was an open-plan office. We had the head of
 17 Legal, which was -- I've forgotten his name now,
 18 Hugh Flemington, I think it was, and the
 19 director of -- or counsel was Susan Crichton.
 20 She was a lovely lady, and Hugh, we got on
 21 really well. As and when we needed it, needed
 22 them to discuss matters, I did. I said, "Look,
 23 you know, I can't deal with it the way it is,
 24 the way I want to do it", because the whole
 25 point was it was a challenge and I have always

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1 been up for challenges.

2 And I think they understood, or they didn't
3 understand, I don't know what they did or didn't
4 do about it now but, certainly, I did the best
5 I could and I was glad that you had Cartwright
6 King with the senior experienced expertise to
7 work with, that's the sort of thing I was
8 looking for, basically, and I just fitted in
9 with their team.

10 And that's how it sort of worked out for me
11 and I was able to have a direct communication
12 with them, and I think every time I phoned,
13 there was always somebody on the other side to
14 discuss matters to help me with some of the
15 advices internally, which the Post Office needed
16 or wanted.

17 **Q.** You had a long career as a criminal lawyer
18 within the Royal Mail Group and then the Post
19 Office Limited?

20 **A.** Yes.

21 **Q.** Given that long career within the Criminal Law
22 Team, until you left the Post Office in 2015,
23 it's right, isn't it, that you presided over
24 a number of prosecutions which have subsequently
25 been found by the Court of Appeal to involve

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1 entailed the paperwork I received, I assessed it
2 in line with the law, the evidence, the public
3 interest, and whether it was appropriate for
4 charges to go before the courts.

5 So, in that respect, you know -- I didn't do
6 the complete job, I didn't do the
7 investigations, I didn't know anything about the
8 Horizon in the sense about how it operated so we
9 had a witness statement to actually explain it
10 and then we had the barristers in turn to
11 approve it, and then it went before the judge to
12 deal with the enforcement side of things, if it
13 needed.

14 So, in that respect, of course I feel very
15 upset and aggrieved that it had gone so far,
16 because the whole idea of becoming a lawyer
17 wasn't to do any wrong, and I certainly --
18 the -- I didn't want to be here today. I wanted
19 to enjoy a long legal career within the Post
20 Office and whoever, and now to carry on doing
21 the next stage of my life.

22 And certainly, in that respect, of course
23 I take responsibility for the -- what I've done
24 and sometimes you wake up, sometimes you can't
25 sleep, and say "I wish I'd done more. Why did

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1 miscarriages of justice; that's right, isn't it?

2 **A.** That's right, yes.

3 **Q.** Including a number where the Court of Appeal has
4 found that the Post Office didn't actually have
5 any proof that loss had occurred to the
6 organisation?

7 **A.** Yes.

8 **Q.** In your witness statement, would you agree that
9 you accept no personal responsible for any of
10 the actions or admissions relating to the
11 specific cases that you're asked about?

12 **A.** How do you mean? What like -- what do you mean
13 by that?

14 **Q.** You don't accept any personal responsibility for
15 any mistakes made in relation to the cases that
16 we asked you about in your witness statement --

17 **A.** Well, obviously, I -- I'm very grieved --

18 **Q.** That's a different issue.

19 **A.** -- and I'm embarrassed and sorry. I mean
20 I think maybe we ought to start by me
21 apologising directly to the subpostmasters.

22 Obviously, I do, you know, we'll their pain
23 and hurt and I can feel the same. And
24 I don't -- I've never met any of them. My
25 basically employment of job entailed, or my role

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1 I accept the fact that Horizon was robust when
2 it wasn't?" But this has been going on since
3 about the year 2000 when it first came into --
4 into place and, after that -- and I think I more
5 or less started doing more of the subpostmaster
6 work, purely because I think when Debbie Stapel
7 went off and started doing the Royal Mail work
8 and started working from home.

9 So you are relying on other people to tell
10 you that, you know, the system is working, the
11 investigation officers, again, should have been
12 the ones who should have got the evidence from
13 the operators and say, "No, you know, we need
14 more evidence", but then maybe it's our fault as
15 lawyers, and say, "No, where's your proof?
16 Prove the -- prove where the shortfall is?"

17 But I think we're a sort of -- more of us
18 are relying on the -- well, we can only do what
19 we've been given, that is the paperwork and we
20 thought that was appropriate. And we, you know,
21 we worked as a sort of team together and we
22 formulated -- I think I told you about the
23 template which we followed it religiously -- well,
24 I certainly did, religiously, so that we don't
25 overlook anything. On top of it, all our work

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1 was independently assessed and marked, if you
 2 like, by the independent Bar, independent
 3 barristers.

4 **Q.** What scores did they give you when they marked
 5 your work?

6 **A.** I don't know that they actually gave us a mark
 7 but, certainly, if there was no proof or, you
 8 know, whether there was no proof or whatever it
 9 was, they would have turned it back and said,
 10 "No, it's not good enough. We're not going to
 11 proceed with it because there's no evidence."

12 **Q.** In the long answer you've given, you reflect the
 13 approach that you've taken in your witness
 14 statement, would you agree, generating an air of
 15 detachment of you personally from everything
 16 that was going on, blaming the individual
 17 investigators, the Fujitsu witnesses and Fujitsu
 18 the company, and the independent Bar for
 19 anything that had gone wrong. That's your
 20 overall take, isn't it?

21 **A.** Absolutely not. I take full responsibility for
 22 the bits I was involved in.

23 **Q.** The bits --

24 **A.** You know, you cannot work alone on these things,
 25 can you? I mean, you know, if you're going to

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1 (*unclear*) and I think -- I was actually going to
 2 actually apologise to Julian Wilson's family,
 3 seeing that he's not here to see that his good
 4 name has been put intact and things have been
 5 put right.

6 They're the ones who were telling everybody
 7 that the Horizon system is wrong and nobody
 8 believed them and they've been proved right now
 9 and I'm with them.

10 **Q.** I think in those answers you said that you take
 11 responsibility for any mistakes that you made?

12 **A.** Well, I think we worked for the --

13 **Q.** Is that right?

14 **A.** Yes. Well, I wish none of this has happened.

15 **Q.** What mistakes did you make?

16 **A.** Well, the mistakes I made, presumably, are
 17 relying on other people to tell me how wonderful
 18 the system was. But then I wasn't the only one
 19 working there. I mean, you had -- we were --
 20 like I said, we had a team who worked on these
 21 cases. We had investigations throughout the
 22 country. Maybe it was just a big organisation
 23 and we couldn't manage it all. Maybe we were
 24 just given too much work to deal with.

25 I don't know what the answer is. But

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1 do something successful, I think no person can
 2 actually exist on his own. You've got to work
 3 it together. You've got to piece everything
 4 together. I'm not blaming the investigators;
 5 I'm not blaming the Bar, all I'm saying is that
 6 I take this -- took this -- I took this role
 7 very, very obviously. I take this -- I -- it
 8 really hurts me to actually prosecute anybody
 9 to -- somebody to go to court and then lose
 10 their livelihood and also to lose, you know, on
 11 top of it, not only that, and then, you know,
 12 the damage to the reputation and credibility
 13 when there -- when there shouldn't have been any
 14 need for it.

15 **Q.** Overall, would you agree that the impression
 16 that you seek to create in your witness
 17 statement is one of acting with the utmost
 18 professionalism at all times, but of sorrow and
 19 being hurt after the event because, if only you
 20 had known about Horizon, everything would have
 21 been very different?

22 **A.** Absolutely not. I am not that sort of person.
 23 It's not the way -- you made me come across
 24 wrong. I take full responsibility for the --
 25 you know, the hurt and the sorrow people

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1 certainly I take responsibility for everything.
 2 But the last thing I wanted to do is have what
 3 I've got -- what I'm faced with now -- faced
 4 with, you know, the subpostmasters who I advised
 5 on, saying there's sufficient evidence, being
 6 prosecuted and then being sentenced to something
 7 that they've been wrongly convicted of and then
 8 being punished when they shouldn't have been.
 9 And I hope this Inquiry give them something they
 10 can actually get on with their lives.

11 **Q.** Have you identified any mistake that you made
 12 personally?

13 **A.** Well, the mistake I made was the fact that
 14 I was, again, like everybody else, led to
 15 believe that this system was good when it
 16 wasn't.

17 **Q.** So you didn't make a mistake yourself personally
 18 in anything you did, other than placing reliance
 19 on other people?

20 **A.** Well, no, I -- you know, like anything else,
 21 I mean, I thought I was probably the one or --
 22 well, certainly I can tell you from what I did,
 23 all I did was I had a template, each and every
 24 time, I put in the tests and followed it through
 25 all the way to the actual matter going to the

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1 court, even the disclosure aspect of it.
 2 I mean, I took that very, very seriously, and I,
 3 in turn, read through it, went away, came back,
 4 made a few notes. So I -- I don't know what
 5 you're asking me to say. Yes, of course I put
 6 my hand up. Of course, I made mistakes.
 7 Everybody does. But these were very, very
 8 serious mistakes and I wholeheartedly wish they
 9 had never happened.

10 And I sometimes wish, you know, if I had the
 11 opportunity to leave the Post Office, I wish
 12 I left before this, you know, mess basically.

13 That's all it is, isn't it? Because it
 14 wasn't -- somebody senior should have said,
 15 "Well, no, where's the evidence? Where's the
 16 evidence?" Maybe the biggest mistake anybody
 17 made is not actually to say, "Well, look, this
 18 isn't good. Where is the evidence? Where is
 19 the evidence the system is actually good?"

20 Q. You said in the course of one of the previous
 21 three answers that it hurt you to prosecute
 22 anyone?

23 A. Yes.

24 Q. Can I see whether that's true. Can we look
 25 please at paragraph 206 and 207 of your witness

41

1 please. If we can focus on the email on the
 2 bottom part of the page, please.

3 Can you see that there's an email there
 4 sent -- we can just see it on the right-hand
 5 side. It's sort of squished in, Marilyn
 6 Benjamin, I think, on behalf of Jarnail Singh
 7 sent on 21 October 2010 at 2.58; can you see
 8 that?

9 A. Yes. Yes, I can.

10 Q. The subject "Regina v Seema Misra at Guildford
 11 Crown Court -- Trial -- Attack on Horizon". Can
 12 you see that this email does not appear to be
 13 part of a chain?

14 A. I don't know what you mean by that.

15 Q. Do you know what a chain of emails is?

16 A. Yes, yes I know. Yes.

17 Q. If you look, for example, at the following page,
 18 it's blank.

19 A. Yes.

20 Q. No email there.

21 A. Yeah.

22 Q. Then if we go back to page 5. If you look at
 23 the subject heading, can you see that, the
 24 subject heading? If that can just be
 25 highlighted.

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1 statement, please, which is on page 69. It'll
 2 come up on the screen. You're saying:

3 "I have considered my email dated 21 October
 4 2010 and my memo to Post Office Security and
 5 others dated 16 November 2010."

6 A. Yeah.

7 Q. "At the time, I thought the outcome of the case
 8 was a success and I was relieved that the case
 9 was concluded.

10 "There is a comment in my email that 'it is
 11 hoped the case will set a marker to dissuade
 12 other Defendants from jumping on the Horizon
 13 bashing bandwagon'. I was asked to report back
 14 to the team and in doing so, I commented on the
 15 outcome and the fact that the Defence's
 16 criticisms of the Horizon IT system were dealt
 17 with and that the prosecution case was made out.
 18 I was aware that the case was of wider interest
 19 within the business and my comment in relation
 20 to other cases was made with this in mind.

21 "The wording of the email also had some
 22 input from Counsel."

23 A. Yes.

24 Q. Can we look, please, at the email to which
 25 you're referring there. POL00093686, page 5,

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1 A. Oh, "Attack on Horizon", yeah.

2 Q. It doesn't say, "Re: Regina v Seema Misra" or
 3 "FW: Seema Misra". When you a reply to an email
 4 or forward an email, the subject heading
 5 changes, doesn't it?

6 A. I don't know. I don't know.

7 Q. You do not know that?

8 A. I don't know.

9 Q. Would you agree that this looks like
 10 an originating email from you, you started off
 11 the conversation here?

12 A. Well, I was asked -- normally -- I mean, if
 13 you've seen the previous reports, they're
 14 basically done by legal executives. The case
 15 comes in and then we've got a format for it and
 16 they do it. And I think, in this case, I did
 17 ask Phil Taylor to do it and I was told that,
 18 "Jarnail, look, you need to do this because it's
 19 going to a wider, you know, the wider audience
 20 within the business".

21 That's the reason why I did it, and then
 22 I did basically, you know -- told the first bit,
 23 saying, "Look, this case was, you know,
 24 a lengthy trial at Guildford Crown Court
 25 after" --

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1 Q. We can see what the email says. We're going to
 2 come to that in a moment.
 3 A. Okay.
 4 Q. Would you agree that you appear to have started
 5 the conversation off here by this email?
 6 A. Yes, yeah.
 7 Q. So you picked both the title and the
 8 distribution list?
 9 A. Well, I was given the distribution list. I --
 10 Q. Who gave you the description list?
 11 A. I think maybe Rob Wilson, maybe, I think, Mandy
 12 Talbot.
 13 Q. So how would they give you the distribution
 14 list, Rob Wilson and Mandy Talbot?
 15 A. Well, they said "Look, these people are
 16 interested. This business, these units are
 17 interested in this case and you need to send
 18 it". Even that Doug Evans. Doug Evans was
 19 the -- I don't know the Head of Legal,
 20 basically, of the whole business. I've never
 21 sent Doug Evans anything of that nature.
 22 Q. So would they have emailed you a distribution
 23 list or would they have told you orally to whom
 24 you need to send the --
 25 A. I don't know. I mean this is going back 12/13

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1 A. Well --
 2 Q. Or was that dictated to you?
 3 A. If there is -- it was dictated to me. If you
 4 look at one of the enclosures the Inquiry sent
 5 me, it's a cover, a brown cover on the file.
 6 I don't know where it is now, and that's what it
 7 was. You know, it said, "Jarnail, you ought to
 8 do it, you're the senior lawyer, it's your
 9 case", that type of thing, and that's when I did
 10 the first bit, then I was told that "You need to
 11 do a little bit more because it's going to go to
 12 our communication team". I didn't even know we
 13 had a communication in existence.
 14 So, basically, then that last bit about the
 15 jumping on the Horizon bashing --
 16 Q. I haven't asked you about that. All I'm asking
 17 you about at the moment is the --
 18 A. Well, let's stick with that. It wasn't my idea
 19 to put it the way it is. What I would have done
 20 is the Post Office Limited v Seema Misra, this
 21 was the result, the case was concluded after
 22 a lengthy trial and she was found guilty by the
 23 jury.
 24 Q. Whose idea was it? Who dictated to you that the
 25 words "Attack on Horizon" needed to be included

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1 years.
 2 Q. Yes.
 3 A. But yeah, I --
 4 Q. One way or another, they would have given you
 5 the distribution list?
 6 A. Yeah, I don't know any of them. I mean, even
 7 Susan Crichton, I have probably met her.
 8 I didn't know her. Certainly -- any of them.
 9 I mean, Mandy Talbot I know because I think she
 10 was in the civil litigation in the same building
 11 and Impact House at Croydon. Hugh Flemington,
 12 I don't know who he was. I mean, subsequently
 13 when I joined the -- the Post Office Limited on
 14 1 April '12, I've never met him. I don't know
 15 who he was. Jacqueline, I don't know. Jessica
 16 Madron, yes, I think she was at Impact House.
 17 John, and all the rest of them, I've never even
 18 met so I don't know who they were. So certainly
 19 I wouldn't have just plucked them out of the air
 20 and put them in.
 21 Q. So you at least picked, if you didn't pick the
 22 distribution list, you picked the subject title
 23 of the email?
 24 A. I don't know --
 25 Q. You --

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1 in the subject line?
 2 A. I don't know. I can't --
 3 Q. Help us.
 4 A. I honestly -- this is such a long time ago.
 5 I wish I could. I mean, let me, you know,
 6 the -- this thing, your papers the Inquiry has
 7 had forwarded to me, I've read them so many
 8 times you would not believe it because I do want
 9 to come and assist. And if -- that heading was
 10 not something that would naturally come to me.
 11 Let me put it to you that way. What I --
 12 Q. It was something that would come naturally to
 13 you because you viewed this case, didn't you
 14 Mr Singh, as being about an attack on Horizon,
 15 didn't you?
 16 A. Absolutely not. I had no --
 17 Q. That's why you've headed your email up that way.
 18 A. No. I can honestly say -- let me put it this
 19 way: look, Mr Beer, no.
 20 Q. Who viewed the case as an attack on Horizon?
 21 A. Well, I think after a period, I think it started
 22 off as a very simple case. I think Mrs Misra
 23 pleaded guilty --
 24 Q. No, who viewed the case as an attack on Horizon?
 25 A. I don't know. I mean, I wish I could assist.

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1 I don't know. I honestly do not know.
 2 **Q.** But you didn't?
 3 **A.** I did not.
 4 **Q.** So you're typing an email --
 5 **A.** I didn't type it.
 6 **Q.** Okay, you're dictating it to your secretary --
 7 **A.** Yes, and I think, like I told you, if you look
 8 back at the cover of the file, I don't know who
 9 I was talking to, and I -- that was where I --
 10 I didn't have a paper so I -- I jotted the notes
 11 on the cover of the file. And I, you know, if
 12 you give me time at the break I will tell you
 13 where it is. But there is a cover where there
 14 are scribbles and whatever it is on it.
 15 **Q.** I think I know the document you're referring to.
 16 **A.** Yeah.
 17 **Q.** But are you saying that somebody dictated --
 18 **A.** Yes.
 19 **Q.** -- that you needed to use the words --
 20 **A.** Yes.
 21 **Q.** -- "Attack on Horizon" --
 22 **A.** Absolutely --
 23 **Q.** Hold on. You dictated an email, even though you
 24 didn't believe it was a case about an attack on
 25 Horizon? Is that where we've got to?
 49

1 position she had at that time, but I'm sure it
 2 was a senior. And, certainly, the other people
 3 involved in it, presumably they had some sort
 4 of --
 5 **Q.** Why was this case viewed by others as an attack
 6 on Horizon, rather than simply a lady in
 7 criminal proceedings saying that she was not
 8 guilty of stealing money, rather the operation
 9 of the system and errors within it were to blame
 10 for the losses?
 11 **A.** I think you're asking the wrong person.
 12 I certainly wouldn't --
 13 **Q.** So the man that dictated the email that says,
 14 "Attack on Horizon", is the wrong person to ask
 15 why the case was viewed as an attack on Horizon?
 16 **A.** Well, I --
 17 **Q.** Is that where we've got to, Mr Singh?
 18 **A.** I think so I -- honestly, this is -- this sort
 19 of thing doesn't come naturally to me and,
 20 certainly, my -- I would have completed the
 21 case, I'm the lawyer in the case and I would
 22 have got one of the legal executives to -- in
 23 a normal scheme of things, they would have
 24 reported, concluded the case, and that would
 25 have been it.
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1 **A.** I don't know whether it's an attack on Horizon,
 2 Horizon -- I've got no stake in Horizon, I don't
 3 even know how it operated or anything of that
 4 nature. Certainly, dealing with the *Misra* case
 5 it opened my eyes to all sorts of things,
 6 I mean, before I didn't have. All I was trying
 7 to express to you originally was that my case
 8 was that you have the investigation file, you
 9 assess it, as appropriate, in line with evidence
 10 in the public interest test. And then, if
 11 there's an appropriate charge, you put it before
 12 the court for the court to decide.

13 But, certainly, this thing doesn't come
 14 naturally to me and my thing was to --
 15 I finished the job, the case is completed, the
 16 legal executives managed it and they would have
 17 done -- concluded the case -- they would have
 18 reported to the, you know, the Post Office
 19 support office, and cc'd in the officer. That
 20 would have been normal.

21 But because this case was the only case that
 22 actually had a lot of the -- you know, actually,
 23 went to trial, I think, and obviously, all of
 24 a sudden, everybody was interested in it. You
 25 know, Susan Crichton. I mean, I don't know what
 50

1 And, certainly, because of the importance of
 2 the other side -- you know, the other aspect of
 3 the business, or the wider business, internally,
 4 that's why it was dealt with in that way.
 5 **Q.** Isn't it the case that your use of these words
 6 is a fair description and it precisely
 7 represents how you saw things at the time. If
 8 someone said they weren't responsible for losses
 9 but that Horizon had system errors, that was
 10 an attack on Horizon. That's how you viewed
 11 matters, isn't it?
 12 **A.** No, absolutely not. I -- like I said, this
 13 system has been in existence. You had senior
 14 people to me with more experience who have been
 15 dealing with it and it just -- somehow or other,
 16 this case landed on my desk and I dealt with it
 17 as I felt it ought to be done.
 18 I was very careful and cautious and
 19 I think -- maybe we will be coming on to it
 20 subsequently, I think -- I put every single
 21 thing in it to make sure that it was very
 22 thorough. There should be no stones unturned to
 23 have this young -- this lady being either put
 24 through it or certainly found guilty and went to
 25 prison for it. That is not the sort of thing
 52

1 I would want to get involved in.

2 **Q.** You say in your email:

3 "After a lengthy trial at Guildford Crown

4 Court the above named was found guilty of theft.

5 This case turned from a relatively

6 straightforward general deficiency case to

7 an unprecedented attack on the Horizon system.

8 We were beset with [I think it should read

9 'an unparalleled'] degree of disclosure requests

10 by the defence. Through [the] hard work of

11 everyone, Counsel Warwick Tatford, Investigation

12 Officer Jon Longman and through the considerable

13 expertise of Gareth Jenkins of Fujitsu we were

14 able to destroy to the criminal standard of

15 proof (beyond all reasonable doubt) every single

16 suggestion made by the Defence.

17 "It is to be hoped that the case will set

18 a marker to dissuade other defendants from

19 jumping on the Horizon bashing bandwagon."

20 Would you agree that the language that you

21 used is quite breathless and rather emotive, in

22 describing the outcome of Mrs Misra's case.

23 **A.** Yes, I --

24 **Q.** Why did you use breathless and emotive language?

25 **A.** Well, I think the last bit is wrong completely,

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1 Team. I would not say anything of that nature.

2 You need to ask him as and when but I can tell

3 you now: this is not me. This is not the way

4 I would have done it.

5 **Q.** So you said it was approved by him?

6 **A.** Yes.

7 **Q.** Was he one of the dictators?

8 **A.** I don't know whether he did or not. To be

9 honest with you -- to be honest, I -- I'm not

10 here to name names. I mean --

11 **Q.** I think you just did.

12 **A.** I did, because --

13 **Q.** Because I asked you?

14 **A.** Yes. You asked me and I am here to assist and

15 help. I'm not here to, you know, deny

16 everything. I mean, like I said, from the

17 outset, what is the truth is the truth and

18 I can't get away from it.

19 **Q.** Can we move on from the platitudes, please, and

20 answer my questions.

21 **A.** Yes, go on.

22 **Q.** Who dictate this email to you?

23 **A.** I think various people had input in it but

24 I certainly dictated --

25 **Q.** Who dictated it?

55

1 I accept that, the marker. But, like I said to

2 you, it was not my language. I would not write

3 anything of that nature. All I would have done,

4 you've seen the other formats, Mrs Misra found

5 guilty at Crown Court, the sentence, and that

6 would have been it. But, obviously, because

7 this is of interest to the wider internal Post

8 Office community or the Royal Mail Group, as it

9 was, I was put in a position to do -- to

10 actually put my name to it and that's exactly

11 what I did. It wasn't --

12 **Q.** Did somebody else type an email which you cut

13 and pasted into this one?

14 **A.** No, no, no.

15 **Q.** No, okay, hold on --

16 **A.** They dictated it.

17 **Q.** Who dictated it?

18 **A.** I don't know. I mean I don't know, there was

19 probably various people over --

20 **Q.** So A collection of people?

21 **A.** Probably, yes, and I think it was approved by --

22 **Q.** Who are the possible candidates for dictating

23 your email?

24 **A.** It was -- this wording was approved by Robert

25 Wilson, Rob Wilson, Head of the Criminal Law

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1 **A.** I dictated it for my typist to type out.

2 **Q.** Who dictated it to you?

3 **A.** I don't know. I can't --

4 **Q.** Who are the possible candidates?

5 **A.** Well, I -- like I said, to you it was approved

6 by the, you know, the Head of Criminal Law Team.

7 That's all.

8 **Q.** So Rob Wilson?

9 **A.** Yes.

10 **Q.** So he may have dictated this to you and then

11 approved it when he'd seen it?

12 **A.** Well, I don't know whether he dictated it but he

13 approved it, and certainly --

14 **Q.** Who are the other candidates for dictating it to

15 you?

16 **A.** I think the -- I don't know. I mean -- I'm not

17 getting away from it. Maybe it is my fault.

18 Maybe I should have said "No, I'm not going to

19 put my name to it, if you want to do it, do it

20 yourself". Maybe, you know, that's in

21 hindsight --

22 **Q.** Is "destroying" -- the use of the word,

23 "destroying to the criminal standard of proof",

24 appropriate language --

25 **A.** No, no.

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1 Q. -- to have used, given the reality was that this
 2 was a woman going to prison?
 3 A. No, I mean, to hear that she was sentenced to
 4 prison sort of hurt me quite badly. I mean, for
 5 two or three days I think, you know, it shook me
 6 because that's not --
 7 Q. Do you now recognise that the language you used
 8 was unprofessional?
 9 A. Yeah, wholeheartedly. No, no, it shouldn't --
 10 nothing like that should ever be --
 11 Q. Would you agree that the language discloses to
 12 us, it's indicative to us, of a degraded and
 13 debased prosecutorial culture within your
 14 office?
 15 A. No. No, I wouldn't -- look, Mr Beer it's your
 16 job to ask that but it's not, no. I think
 17 I worked with those people very closely and they
 18 are -- I -- we find ourselves with -- here, and
 19 I agree with you, it's inappropriate. It
 20 shouldn't --
 21 Q. The last paragraph where you say:
 22 "It is to be hoped that the case will set
 23 a marker to dissuade from jumping on the Horizon
 24 bashing bandwagon", who within the Post Office
 25 held that hope?

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1 A. Mr --
 2 Q. It was you: you hoped it.
 3 A. No.
 4 Q. That's why you said "It is to be hoped" --
 5 A. No, absolutely not. You can ask me that ten
 6 times, the answer's going to be no, no and no.
 7 Q. Well, of course. That's why you folded your
 8 arms and are giggling?
 9 A. Well, I'm not giggling, I'm sort of hurt inside.
 10 It's giggling because it's -- it's not true.
 11 I'm not giggling at all. I mean, the idea is
 12 that, you know, making -- you know, making that
 13 sort of allegation to somebody who does not even
 14 believe in it -- I mean, I -- you know, the
 15 reason why I was there such a long time, I know
 16 if I had to go to court and actually physically
 17 see these people, then I wouldn't be able to do
 18 the job. I think I would have left a long time
 19 ago.
 20 At the end of the day, this was a paper
 21 exercise. You had the investigation file and
 22 you dealt with the paper. You basically weigh
 23 up where there's evidence, sufficient evidence
 24 for getting a realistic prospect of conviction,
 25 public interest, and a lot of the time you're

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1 A. Well, certainly not the Criminal Law Team.
 2 Certainly, I didn't. I mean, I wish I --
 3 Q. I'm not asking who didn't hold it; I was asking
 4 you who did hold it?
 5 A. Well, whoever dealt with the case. You know,
 6 I didn't even know that civil litigation had --
 7 had cases starting from the initiation of -- or
 8 the introduction of the Horizon system and,
 9 presumably, the Civil Litigation Department
 10 certainly, maybe the Communication Team. You
 11 know, those are the people whoever dealt with
 12 the Horizon, whoever had any connections with
 13 the Horizon.
 14 I mean, certainly the Criminal Law Team,
 15 I can put hand on heart, I wouldn't have thought
 16 anybody had that. I mean, you've heard evidence
 17 from, you know, a couple of -- a couple of the
 18 lawyers working there and they were quite badly
 19 shaken. I think one of the ladies -- I've
 20 forgotten her name now, Teresa -- Teresa --
 21 I mean, you saw her give evidence. I mean, she
 22 was in tears. She was really broken by that --
 23 Q. So who did hope that the Seema Misra case would
 24 be a marker that would dissuade other defendants
 25 from jumping on the "Horizon bashing bandwagon"?

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1 trying to look for a reason for not -- for them
 2 to deal with it in an alternative way out of
 3 court.
 4 Q. Mr Singh, do you now accept that the aspiration
 5 that's disclosed in this email, of dissuading
 6 subpostmasters who believed that there were
 7 system faults with Horizon from raising such
 8 system faults when they were accused of criminal
 9 offences, was entirely at odds with your
 10 professional duties?
 11 A. Well, I -- well, look, in hindsight, you can say
 12 all sorts of things. The thing is --
 13 Q. Well, I'm saying that and I'm asking you the
 14 question.
 15 A. Well, I don't know what -- are you asking me
 16 to -- what are you asking me? Please ask me.
 17 Q. Do you accept now that writing this aspiration,
 18 the hope that the outcome of the case will
 19 dissuade other subpostmasters who might think
 20 that Horizon is to blame for their losses from
 21 raising that when they're accused of criminal
 22 offences, is at odds with your professional
 23 duties?
 24 A. Of course. Of course it is. I mean, I wish --
 25 Q. How did you satisfy yourself that other

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1 subpostmasters would be jumping on the Horizon
2 bashing bandwagon?
3 **A.** I don't -- I can't. I mean, like I said, this
4 is the one and only case that's gone to trial.
5 I didn't even realise that some of the cases
6 have been started in more or less when the
7 system was installed. So I don't know. I mean,
8 you know, in your position, you can write in to
9 all sorts of things but certainly that's not my
10 thinking at all.

11 I wish -- you know, the greater the wish
12 I had was that wish this sort of case has been,
13 you know, challenged, or in the courts a lot
14 earlier. You know, the year 2001, the year
15 2002/3, so we wouldn't have to face this.
16 Certainly, it just landed on my desk and I dealt
17 with it but, certainly, that's not, you know, my
18 intentions at all, and I'm not smiling. I am
19 just sort of feeling so aggrieved that you're
20 asking me this because that's not the idea of --
21 you know, it was a challenge to qualify as
22 a lawyer and I don't -- the last thing I wanted
23 to finish this off was something like that.

24 **Q.** Well, let's look at a new document and see
25 whether you're less aggrieved by the questions

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1 Managing Director of the entire company at that
2 time; is that right?

3 **A.** I don't know. I honestly don't know who Dave
4 Smith is.

5 **Q.** Do you not recall there were two Dave Smiths on
6 the emails, David X Smith, who was head of IT,
7 and David Y Smith, who was the MD of the company
8 you worked for, no?

9 **A.** No.

10 **Q.** Okay. In any event, we know that David Y Smith
11 was the MD and he's saying:

12 "Rod

13 "Brilliant news. Well done. Please pass on
14 my thanks to the team."

15 Then if we scroll up a little bit further,
16 we can see that that email has been repurposed
17 by Mr Ismay, and has been sent back to
18 a distribution list that largely represents the
19 distribution list of your email. Can you see
20 that?

21 **A.** Yes, and --

22 **Q.** He says:

23 "Dear all -- please note Dave Smith's thanks
24 to you all for your work on this important case.

25 "Dave and the ET [the Executive Team] have

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1 I ask you. POL00169170. This is a new document
2 that's recently become available to the Inquiry,
3 as a result of recent disclosures. If we just
4 look at the foot of page 1, please.

5 We can see -- thank you, stop there -- your
6 email of 21 October 2010 at 2.58, the one we've
7 just looked at, yes:

8 "After a lengthy trial the Guildford Crown
9 Court the above named was found Guilty of
10 theft."

11 Yes?

12 **A.** Yes.

13 **Q.** Yes?

14 **A.** Yeah.

15 **Q.** Then if we go further up the page, just stopping
16 there, we can see a reply or a forwarding or
17 a cutting and pasting of your email to a new
18 collection of people and, in part, a reply to
19 Mr Ismay. It says:

20 "Rod

21 "Brilliant news. Well done. Please pass on
22 my thanks to the team.

23 "Regards.

24 "Dave."

25 That is David Y Smith there, that was the

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1 been aware of the significance of these
2 challenges and have been supportive of the
3 excellent work going on in so many teams to
4 justify the confidence that we have in Horizon
5 and in our supporting processes.

6 "This is an excellent result and a big
7 thanks to everyone.

8 "Rod Ismay

9 "Head of Product & Branch Accounting."

10 So just to scroll down a little bit, we can
11 see what happened, your email has been sent to
12 some, would you agree, big figures within the
13 organisation, including Rod Ismay; you knew who
14 he was?

15 **A.** No. I don't think so.

16 **Q.** You didn't? Presumably when you received the
17 email back you did because, under his signature
18 block, it's got that he was head of Product and
19 Branch Accounting?

20 **A.** Well, that I knew but I'd never met the guy.

21 I didn't know -- I didn't even know what the
22 head of Product and Branch Accounting was, to be
23 honest.

24 **Q.** Mike Moores, did you know who he was?

25 **A.** No.

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1 Q. Mike Young?
 2 A. No.
 3 Q. Paula Vennells?
 4 A. I -- only when I joined the Post Office Limited.
 5 Q. So that was a couple of years after this, or
 6 a year and a half after this, in April 2012?
 7 A. I mean, I probably heard the name but I'd never
 8 met her. I didn't have any dealings with her.
 9 I don't think I've directly emailed her or had
 10 any communications with her. I don't think so,
 11 I don't.
 12 Q. But, anyway, the message coming back to you is
 13 that Dave, who I've told you was the MD of the
 14 company, and the Executive Team have been aware
 15 of the significance of these challenges.
 16 A. Yes.
 17 Q. Did you know about that, when you were
 18 litigating the prosecution of Seema Misra?
 19 A. No, I don't think so.
 20 Q. That the Executive Team were keeping an eye on
 21 what was going on?
 22 A. No. I honestly did not. I just dealt with it
 23 in the normal scheme of things. I mean,
 24 obviously, it was complicated and difficult but
 25 I didn't know, you know, that there was a, you

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1 the Horizon system?
 2 A. No. That is not the way I handled this case.
 3 Q. You see that that's how Mr Ismay seems to have
 4 viewed it?
 5 A. Yeah, but then I can't, you know, control what
 6 he thinks or he doesn't think.
 7 Q. This more than a pat on the back, isn't it,
 8 a congratulatory email about the outcome of one
 9 prosecution case, rather than any others, isn't
 10 it?
 11 A. I just went -- quietly went on with my business,
 12 I mean, went on and started dealing with the
 13 other case. This case was left --
 14 Q. Presumably you didn't receive emails from
 15 exalted company like this very often at the end
 16 of each successful prosecution case, did you?
 17 A. To be honest, I don't really -- I don't know how
 18 to put it. I'm not really into all this sort of
 19 side of things. I'm not a public sort of
 20 person. I didn't think anything of that.
 21 I mean, I don't know whether I saw it, I even
 22 read it, once maybe when it came in, closed it,
 23 and I think a lot of the time I'm not really IT
 24 sort of person. I had a desktop on my desk but
 25 I don't think I paid much attention to it.

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1 know, big interest. I mean, I assume it would
 2 be, but -- because, you know, the Post Office
 3 are reliant on Horizon because, you know, it was
 4 their tailor-made for their business -- you
 5 know, I don't know, 12,000, 13,000, 14,000 units
 6 they had at the time.
 7 But, even that aspect of it, any came to my
 8 knowledge purely because having dealt with the
 9 *Misra* case. The *Misra* case opened up everything
 10 and it educated me or advanced me in the whole,
 11 you know, the whole business, I suppose.
 12 I didn't know anything about, you know, the way
 13 the system was put together.
 14 Q. Is the way that Mr Ismay describes your work as
 15 "justifying the confidence we have in Horizon"
 16 accurate?
 17 A. I don't know -- well, I don't know what he
 18 thought but, I mean, certainly --
 19 Q. Did you see it as your job to justify the
 20 confidence --
 21 A. No, no.
 22 Q. -- that the organisation had in Horizon?
 23 A. No, no, no, no.
 24 Q. Was the prosecution an exercise in justifying
 25 an existing belief, an existing confidence, in

66

1 I was a traditional, old school lawyer and
 2 I don't think -- this sort of thing is not for
 3 me. And, certainly, you can make whatever
 4 interpretations you like but that's not what
 5 this was. I mean, the -- I actually tried to
 6 assist Mrs Misra in every respect I could.
 7 When she said she wasn't, you know, good at
 8 IT, I actually for the first time, I think, got
 9 her HR record to hopefully, fingers crossed,
 10 prove that she wasn't. But, obviously, it
 11 didn't. But no, that --
 12 Q. Sorry, you're saying you sought out Mrs Misra's
 13 HR record to hopefully, fingers crossed, help
 14 her out?
 15 A. Help -- assist her in the sense that she was
 16 saying -- whatever she was saying, that she
 17 wasn't good with the -- you know, with the IT
 18 side of it, or whatever it is.
 19 Q. I'd ask you to remember that answer --
 20 A. I will, yeah.
 21 Q. -- that you were trying to help Mrs Misra out,
 22 with your fingers crossed?
 23 A. Well, not help her -- well, yeah, that's the
 24 wrong expression, because I probably, you know,
 25 the -- I'm not comfortable with the questions

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1 you're asking and I think because -- purely
 2 because that doesn't justify any of the
 3 interpretation you're putting on it. Because
 4 that -- that side of it didn't really -- wasn't
 5 what it was. I didn't even know any of the
 6 people, whatever they did or didn't do, or, you
 7 know, Paula Vennells, Mike Young. I mean,
 8 I don't know what positions they held until --
 9 even Mike Young, I don't even know how he fitted
 10 into the business. Paula Vennells, I did,
 11 purely because she was the legal executive at
 12 the Post Office Limited and she was in the same
 13 office.

14 **Q.** Mr Singh, isn't it right that the reason why
 15 this case was seen as significant and important,
 16 and the reason why you wrote your email that
 17 we've just seen is that the case was seen as
 18 essential to justify the continued confidence of
 19 the Post Office in Horizon --

20 **A.** No.

21 **Q.** -- isn't it?

22 Sir, that's an appropriate moment --

23 **THE WITNESS:** Can I just add something?

24 **MR BEER:** I'm so sorry, you've got another answer.

25 **A.** Yeah, if that was the case, I certainly wouldn't
 69

1 me?

2 **SIR WYN WILLIAMS:** Yes, I can.

3 **MR BEER:** Thank you, sir.

4 Can we move forward, please, Mr Singh to
 5 December 2013. I'm still asking you questions
 6 about culture and mindset within the Post Office
 7 prosecution lawyers team.

8 **A.** Certainly.

9 **Q.** POL00141653, please. Thank you. Can we turn to
 10 page 5, please. Just to give you some context
 11 to the questions I'm going to ask, we can see
 12 an email to you from Rodric Williams,
 13 a litigation lawyer:

14 "Jarnail -- senior management has asked for
 15 the 'current position on prosecutions -- when
 16 paused/what do we have in train'.

17 "Can [we] put something together?"

18 If you go, please, to page 3 and scroll
 19 down, you say on 4 December:

20 "Please find attached a Current snapshot of
 21 position of [Post Office] prosecution cases.
 22 Let me know if you need anything further."

23 Then if we go to the bottom of page 2,
 24 please. An email from you to David Oliver --
 25 who was David Oliver?
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1 be dealing with it. It would be somebody like
 2 Rob Wilson or maybe Juliet McFarlane. Juliet
 3 McFarlane was a lead in this sort of case, in
 4 the -- you know, the prosecution of
 5 subpostmasters. It wasn't me. I was at -- you
 6 know, just more or less dealt with the
 7 straightforward prosecutions of subpostmasters,
 8 as you would see from the case studies, you
 9 know, the cases you listed.

10 So it wouldn't have been me, it was just by
 11 pure coincidence, accident or whatever it was,
 12 that was the reason why I -- you know, I dealt
 13 with it.

14 **MR BEER:** Thank you, Mr Singh.

15 Sir, if it's convenient to you, might we
 16 take a break?

17 **SIR WYN WILLIAMS:** Yes, and what time shall we
 18 resume?

19 **MR BEER:** 12.10, please.

20 **SIR WYN WILLIAMS:** Certainly.

21 **MR BEER:** Thank you, sir.

22 **(11.52 am)**

23 **(A short break)**

24 **(12.10 pm)**

25 **MR BEER:** Good afternoon, sir, can you see and hear
 70

1 **A.** No idea, honest. I mean, at that time there
 2 were so company teams set up, so many people
 3 coming and going, so many QCs, senior lawyers,
 4 agents. I honestly don't know how he fitted
 5 into anything.

6 **Q.** Okay. So at this time, December 2013, just to
 7 orientate ourselves, Second Sight was
 8 undertaking its work, yes?

9 **A.** Yes, yes.

10 **Q.** This is after Simon Clarke from Cartwright
 11 King's Advices, yes?

12 **A.** I don't know. I mean --

13 **Q.** We know they're July and August 2013?

14 **A.** Yes, possibly.

15 **Q.** We're going to come back to all of this next
 16 year, Mr Singh --

17 **A.** Yeah, right.

18 **Q.** -- ie the extent to which the Post Office
 19 continued to prosecute people, in the light of
 20 information revealed to it --

21 **A.** Yes.

22 **Q.** -- and the advice that it received and whether
 23 there was an attempt to cover up information and
 24 documents that might have led to criminal
 25 convictions being overturned. But I'm looking
 72

1 at it for a different purpose at the moment.
 2 You say to Mr Oliver:
 3 "Following my discussions with you and
 4 Belinda ..."
 5 Can you remember who Belinda Crowe was?
 6 **A.** I think she was head of something, I mean,
 7 I don't know what. Because it -- it was
 8 difficult, because there's so much going on,
 9 people dealing with mediation, people dealing
 10 with all sorts of aspect of, you know, the
 11 mediation, Chief Executive appearing before
 12 committees, and -- you know, do you know what
 13 I mean?
 14 And Belinda, I have met her. I don't know
 15 what position. She was heading something or
 16 other but, you know, years on, I've forgotten,
 17 I don't even know her surname. I think,
 18 probably --
 19 **Q.** Crowe.
 20 **A.** Oh, there it is, there, yeah.
 21 **Q.** You continue:
 22 "... here is a quick note which may help
 23 with some of the answers to [I think that should
 24 be 'the'] board's questions."
 25 Looking at this, does it seem as if the
 73

1 "[Had] Post Office stopped every single
 2 prosecution, what signal would/does that send
 3 out about confidence in the Horizon system."
 4 Now, I'm going to come back next year to ask
 5 you about what all of this means and what was
 6 being done in terms of deciding which cases to
 7 proceed with, which cases were proceeded with
 8 because an admission had been made, which cases
 9 were proceeded with because an admission had
 10 been made but no Horizon disclosure had been
 11 given, and the like. But then you continue:
 12 "Advised On ...
 13 "Here former General Counsel [I think that
 14 should be 'gave'] instructions that no further
 15 summons to be issued for the time being.
 16 "1. Security Team wished to continue
 17 investigating and cases [I don't know this
 18 means] were advice on and prepared for the
 19 following reasons:
 20 "a) so that evidence was not lost/witnesses
 21 recollections deteriorated prior to any
 22 statements being taken.
 23 "b) so that Investigation Team could
 24 continue to process the work and get the
 25 prosecution in ready condition thereby avoiding
 75

1 board of the Post Office Limited had asked some
 2 questions; is that right?
 3 **A.** Yeah, that's what it looks like.
 4 **Q.** Then under the heading "Live Prosecution
 5 Matters":
 6 "1. It was regard acceptable to proceed
 7 with.
 8 "2. Number of the prosecutions were in the
 9 pipeline and currently in Court.
 10 "3. Looked at case by case ... and decision
 11 made on them to continue."
 12 Then over the page:
 13 "4. Certain cases terminated after review.
 14 Others were safe to continue with -- Guilty
 15 plea. Admissions and not challenged the Horizon
 16 in Court, ie Defendant made full and frank
 17 admissions, pleaded guilty, substantial amount
 18 theft of money, breach of trust, it would have
 19 been [a] miscarriage of Justice to let them walk
 20 three. Therefore the prosecution continued.
 21 "5. The cases were not stopped because it
 22 did not need to be.
 23 "6. Have Post Office stopped every single
 24 ..."
 25 I think that should read "had":
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1 impossible workload, as and when prosecution is
 2 resumed.
 3 "Hope this helps."
 4 So it seems like you're explaining which
 5 cases are going to court and which cases have
 6 been advised on, yes, and why you're continuing
 7 to work on cases and the Investigation Team are
 8 continuing to work on cases, even though General
 9 Counsel had given instructions that no further
 10 summonses were being issued, yes?
 11 **A.** Well, I mean, I don't know. I don't know how to
 12 explain this but it's such a long, long time
 13 ago. There was, you know, there's so much
 14 pressure and I think the -- it's very easy now,
 15 you've got the time to actually consider all
 16 that but that was on a -- don't forget the
 17 prosecution has been tendered out to a third
 18 party and that's more or less what their
 19 position was, for me to advise in turn. So it
 20 wasn't --
 21 **Q.** At the moment I'm not asking you to justify what
 22 was done or asking you the substance -- about
 23 the substance of what was done; this is just to
 24 give you some background to the email that we're
 25 looking at, to see in what context it was sent.
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1 **A.** Yes, it's an update.
 2 **Q.** Can we go to page 1, please. At the bottom of
 3 the page, Mr Oliver replies to you:
 4 "Jarnail,
 5 "Thanks for this.
 6 "I have a few questions now and will
 7 probably come back with a few more if okay ..."
 8 Then if we just go to the top of the page,
 9 you replied saying:
 10 "Please see my reply in red below."
 11 Yes?
 12 **A.** Yeah.
 13 **Q.** If we scroll down, there are four questions and
 14 if we can highlight those questions to start
 15 with, so we can see what they were, in yellow,
 16 please. So question 1 is:
 17 "On the live prosecution cases can you give
 18 me a few paras with why you are proceeding with
 19 the POCA enforcement hearings?"
 20 Yeah? Then there's your reply, which would
 21 have been in red in the email, in the original;
 22 do you understand?
 23 **A.** Yes.
 24 **Q.** Then over the page, please. Question 2 is under
 25 that bullet point:

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1 "These are not mutually exclusive. As the
 2 landscape now stands in most of the cases it is
 3 better that we have the expert instructed as any
 4 case begun now will attract some type of Horizon
 5 issue because this is the passing bandwagon
 6 people are jumping on. When we have a few wins
 7 under our belt the Horizon challenges will melt
 8 away like midnight snow. In some cases,
 9 eg Redman, we do not need the expert as she has
 10 made full admissions but the cases where Horizon
 11 can be completely ruled out are few and far
 12 between even if it only goes to quantum (value
 13 of loss).

14 "Much of the work requested in our charging
 15 advices is dotting Is and crossing Ts. Most of
 16 the cases advised for charge will be sound
 17 prosecutions with comparatively little extra
 18 work when we either have an expert's statement
 19 in the bundle or we can get one if the Horizon
 20 is raised in a case.

21 "If you have any further questions, please
 22 don't hesitate to get back."

23 You see in that answer -- and this is
 24 December 2013, after Second Sight has started its
 25 work, after the Clarke Advices have revealed, in

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1 "What is a PCMH stage?"
 2 Yes?
 3 **A.** Yes.
 4 **Q.** Then your reply, we can see it because it's in
 5 a different font begins "The PCMH stage is",
 6 yeah?
 7 Then question 3 is:
 8 "What is a mention before trial?"
 9 Yeah?
 10 **A.** Yes.
 11 **Q.** Then question 4 is:
 12 "Of the 31 advised on cases how many are
 13 being worked on for further evidence, how many
 14 has there been advice to charge and how many are
 15 awaiting the expert witness?"
 16 Can you see that?
 17 **A.** Yes.
 18 **Q.** So they're the four questions and everything
 19 else is your reply in red; can you see that?
 20 **A.** Yes.
 21 **Q.** On that fourth question, that's the one I want
 22 to ask you about, you reply to the question "How
 23 many have been worked on for further evidence,
 24 how many has there been advice to charge and how
 25 many are awaiting expert [evidence]", you say:

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1 Mr Clarke's view, that Mr Jenkins was
 2 a discredited prosecution witness and couldn't
 3 be relied on in court, and that disclosures
 4 needed to be made which may undermine the safety
 5 of some criminal convictions -- you're saying
 6 that people raising Horizon Issues are doing so
 7 because there's a "passing bandwagon". Why did
 8 you form that view?

9 **A.** I don't know. I had -- it's a sort of -- this
 10 isn't just one person, this -- we worked as
 11 a team, because there was so much going on, it
 12 was a team effort team view. It wasn't
 13 a decision made by me. It was a decision by
 14 people working on it, and not only internally
 15 but externally. They were people with a lot of
 16 experience in this type of work. So this is not
 17 a personal view. It was the view, the general
 18 view, put in that -- put in that answer.

19 **Q.** This is your email?

20 **A.** Yes.

21 **Q.** It's no one else's email?

22 **A.** No, but we -- we worked as a team. I don't
 23 know, I can't explain as to --

24 **Q.** Did somebody dictate this email to you?

25 **A.** Possibly. I don't know. I mean, certainly --

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1 I honestly can't answer that. It's such a long
 2 time ago. Certainly, when you're -- pressurised
 3 situation is completely different. Now, it's
 4 completely different because now we've got the
 5 time to consider it, time to actually digest it
 6 all, but that's what it was at that time.
 7 But I can't give you any explanation of why
 8 it was put in that way because there's too many
 9 issues that came together.
 10 **Q.** Why in December 2013 did you and the team still
 11 view the Horizon issue as a passing bandwagon
 12 that people were jumping on?
 13 **A.** I don't know, I've got no -- I can't explain it
 14 to you. I don't know why that view was at that
 15 time. I don't know.
 16 **Q.** What evidence had you got by December 2013 that
 17 there were no issues with Horizon affecting the
 18 integrity of the data that it produced?
 19 **A.** I don't know.
 20 **Q.** Why was it important to get some wins under your
 21 belt?
 22 **A.** Again, I don't know.
 23 **Q.** Why did you say, "When we've got some wins under
 24 our belt the Horizon challenges will melt away
 25 like midnight snow"?

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1 **A.** No.
 2 **Q.** -- "There's nothing wrong with Horizon" --
 3 **A.** No.
 4 **Q.** -- "people who say there is are jumping on
 5 a bandwagon. We're going to get some wins and
 6 the issue will melt away like the midnight
 7 snow"?
 8 **A.** No.
 9 **Q.** Look at the last paragraph, you say:
 10 "Much of the work requested in our charging
 11 advices is dotting Is and crossing Ts. Most of
 12 the cases advised for charge will be sound
 13 prosecutions with comparatively little extra
 14 work."
 15 Is that reflective of how you, in your time
 16 acting in the Criminal Law Division, worked,
 17 namely your role was just to dot Is and cross
 18 Ts?
 19 **A.** Where are we talking about, old Street or are
 20 you talking about Eccleston Street? Are you
 21 talking about the Criminal Law Team or are you
 22 talking about the Prosecution Support?
 23 **Q.** Let's divide them up, then --
 24 **A.** Yeah, please do that.
 25 **Q.** -- from August 1995, until separation in April

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1 **A.** I don't know.
 2 **Q.** Please help us.
 3 **A.** I wish I could. It's such a long time ago.
 4 **Q.** Are you struggling because you realise the
 5 crassness of what you wrote --
 6 **A.** No.
 7 **Q.** -- and you haven't got a justification?
 8 **A.** Not at all. If I could, I would, but at the
 9 moment I'm struggling in the sense that I can't
 10 explain to what happened in the year 2013, and
 11 we're in the year 2023, on to '24. At that
 12 time, you know, the situation was what it was.
 13 Now, you know people had been wrongly done, and
 14 they've been complaining about something for
 15 such a long time and they've been proved right.
 16 And I feel aggrieved about it as much as
 17 they do, probably not even more, because I was
 18 in a position to do something and I didn't.
 19 **Q.** Is this email further evidence that the mindset
 20 that you displayed in your evidence of October
 21 2010, after the conclusion of the Seema Misra
 22 trial --
 23 **A.** No.
 24 **Q.** -- continued and was still your mindset in
 25 December 2013 --

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1 2012, was your role then, as a criminal lawyer,
 2 to dot Is and cross Ts on advice files?
 3 **A.** No.
 4 **Q.** After April 2012 and before December 2013, was
 5 your role as a criminal lawyer, when advising on
 6 charge, to dot Is and cross Ts?
 7 **A.** No, because I didn't do any of that work.
 8 **Q.** Why did you say "most of the work is dotting Is
 9 and crossing Ts"?
 10 **A.** I don't know. I honestly can't help you
 11 because, from what you're suggesting, I didn't
 12 advise of any of it. It was tendered out.
 13 **Q.** Is that how you viewed matters? You didn't take
 14 a serious look at the evidence. You didn't
 15 evaluate its strengths and weaknesses, you
 16 didn't apply a critical eye to the evidence in
 17 a case: you just dotted the Is and crossed the
 18 Ts?
 19 **A.** No.
 20 **Q.** So why did you write this?
 21 **A.** As I tried to explain to you, CLT -- this
 22 doesn't refer to the Criminal Law Team in the
 23 sense that we're in the year 2013. In the year
 24 2013, I'm basically working with the agents.
 25 The agents are the ones who are doing all the

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1 work. They're -- presumably, that's what their
 2 position was and I'm just highlighting to the --
 3 within the business as to where we are.

4 **Q.** Can we move on and look at a different summary
 5 of the outcome you gave of Mrs Misra's case.

6 **SIR WYN WILLIAMS:** Mr Beer, before that comes down,
 7 there is one thing that occurs to me. If you
 8 hadn't asked the questions because you're going
 9 to do it in a different context, I won't ask any
 10 now but, otherwise, I'd be interested to know
 11 who the expert witness is referred to in the
 12 paragraph that's highlighted.

13 **A.** Sir, which one? Where are we?

14 **SIR WYN WILLIAMS:** I'm asking Mr Beer first of all
 15 whether he wants to deal with it in a different
 16 way or whether I should ask you the question.

17 **MR BEER:** Sir, can I answer it in two ways.
 18 Firstly, I hadn't presently intended to look at
 19 that issue but it may help us in our
 20 investigatory work, on reflection, in readiness
 21 for next year. So I don't think any harm will
 22 be done by asking now.

23 **SIR WYN WILLIAMS:** Right.
 24 Well, then, Mr Singh, do you see the
 25 paragraph which begins "Of the 31 advised on
 85

1 Horizon system as relates to the Post Office.

2 **SIR WYN WILLIAMS:** Yes.

3 **A.** And I think one or two times I did attend with
 4 them, some at the university, some of the
 5 professors, they weren't -- you know, in
 6 Cartwright King's view, they weren't good enough
 7 to deal with it. So I don't know -- at that
 8 time, we didn't find an expert.

9 **SIR WYN WILLIAMS:** So when you reply "As the
 10 landscape now stands in most of the cases it is
 11 better that we have the expert instructed", you
 12 are there indicating, are you, that there should
 13 be an expert instructed but you don't know who
 14 that person is at that moment in time?

15 **A.** Sir, the position there was that all -- I didn't
 16 do any of the work; it was tendered out
 17 exclusive to a third party, Cartwright King, and
 18 it's basically they are telling me -- I've asked
 19 for a progress report, how to reply to it, and
 20 it's basically their answer. They say, "Look,
 21 this is the position", and all I'm doing is
 22 relaying to the business, so I don't -- it's not
 23 something that I have a personal knowledge of.

24 **SIR WYN WILLIAMS:** As far as you can recall,
 25 Mr Singh, was an expert ever identified in late
 87

1 cases", which is highlighted?

2 **A.** Is it -- at the top, isn't there? I can't see
 3 it, sir.

4 **SIR WYN WILLIAMS:** It's about halfway down the
 5 screen --

6 **A.** Oh, yes, sorry, I've got that.

7 **SIR WYN WILLIAMS:** -- and it's the fourth question
 8 that you were going to answer, all right, and it
 9 ends by saying -- well, let me read the
 10 question:
 11 "Of the 31 advised on cases, how many are
 12 being worked on for further evidence, how many
 13 has there been advice to charge and how many are
 14 awaiting the expert witness?"

15 It's that last bit I want to ask you about,
 16 all right?

17 **A.** Mm.

18 **SIR WYN WILLIAMS:** Because I'd like you to tell me,
 19 if you could, the identity of the expert witness
 20 there being referred to.

21 **A.** Sir, at that time, from -- my understanding is
 22 that Cartwright King were looking for an expert
 23 and they couldn't find any, because, as you --
 24 I think, you know, you've been hearing a lot of
 25 evidence, this system is very specialist, this
 86

1 2013 when this email being written, or
 2 subsequently?

3 **A.** Sir, no. It wasn't.

4 **SIR WYN WILLIAMS:** Right. All right. Thank you.

5 **MR BEER:** Thank you, sir, that can come down.
 6 Can we look at a further summary of the
 7 outcome of Mrs Misra's case, much later, please.
 8 POL00113015, and can we start at page 10,
 9 please.

10 We can see an email exchange between Lena
 11 Hameed and Sophie Bialaszewski -- I'm sure I've
 12 mispronounced that -- saying:
 13 "Hi Sophie,
 14 "We haven't got that much information as
 15 there's not CQR yet. But I imagine the legal
 16 team will have the criminal case files -- so
 17 Jarnail will be able to provide a breakdown of
 18 the merits of the case. As far as the scheme is
 19 concerned, this is a summary of what we have:
 20 "Seema Misra was given I post from [some
 21 dates are given].
 22 "MP at the time of her application was
 23 Jonathan Lord.
 24 "Incidents reportedly occurred in the summer
 25 of 2005.
 88

1 "No specific references to Horizon Issues --
 2 cites lack of support as the main factor leading
 3 to the losses.
 4 "Alleges that [Post Office] threatened her
 5 and used mental torture.
 6 "Howe+Co represented -- funding agreement
 7 signed in November.
 8 "Still waiting on a CQR from the
 9 applicant -- apparently SS [I think that's
 10 Second Sight] have it for refinement."
 11 Go to page 9 and look at the bottom, please.
 12 We can see who Sophie was, a Public Affairs
 13 Manager in the Post Office. She now copies you
 14 in to this email on 11 June 2014:
 15 "Thanks so much, Lena. Rodric/Jarnail would
 16 you be able to provide me with a bullet [point]
 17 or two on the legal position eg unanimous guilty
 18 verdict by jury or whatever it would be."
 19 Then up the page, please. You reply:
 20 "Sophie
 21 "Something along the lines of:
 22 "Seema Misra was subpostmistress at West
 23 Byfleet. She was accused of stealing
 24 £74,000-odd between 2005 and 2008. On 21/10/10
 25 after a seven-day trial, she was found guilty by
 89

1 Court the above named was found Guilty of
 2 theft."
 3 Is this looking familiar to you, Mr Singh?
 4 A. Well, yes.
 5 Q. Why does it look familiar to you?
 6 A. Because it's cut and paste from the previous
 7 one -- previous -- you know, the final result --
 8 Q. The one from four years earlier?
 9 A. Yeah.
 10 Q. "This case turned from a relatively
 11 straightforward general deficiency case to
 12 an unprecedented attack on the Horizon system",
 13 et cetera, et cetera.
 14 A. Yeah.
 15 Q. Then you say, outside the inverted commas,
 16 albeit it is a quote from your original email of
 17 October 2010:
 18 "It is to be hope that the case will set
 19 a marker to dissuade other Defendants from
 20 jumping on the Horizon bashing bandwagon."
 21 Those were sentiments that you still felt,
 22 in June 2013, weren't they?
 23 A. No, I --
 24 Q. Why did you write this, then?
 25 A. I didn't feel them from the outset. I don't
 91

1 the jury of the theft."
 2 Then bottom of page 8, please. Reply:
 3 "Hi -- the Comms Team might need a bit more
 4 to help them tell our side of the story
 5 (Sophie -- please correct me if I'm wrong!)
 6 "Is there any more detail you could provide,
 7 eg around:
 8 "the trial being a fully contested
 9 adversarial proceeding, with X number of
 10 witnesses (including experts) being
 11 cross-examined;
 12 "that no appeal was ever pursued against
 13 conviction or sentence or both (or if it was,
 14 how far it went);
 15 "the implications of a jury advert (eg that
 16 it's 12 people unanimously agreeing that all
 17 elements of the offences were proved beyond
 18 reasonable doubt etc)?"
 19 Then if we continue to scroll up, please,
 20 Sophie says:
 21 "Yes please! Thanks Rod."
 22 Then scroll up again. Then you reply:
 23 "How about the following [in inverted
 24 commas]:
 25 ""After a lengthy trial Guildford Crown
 90

1 feel it then. It was just basically reiterating
 2 what was said before. I mean, so, no, that is
 3 not true.
 4 Q. Why did you write an email to media and PR
 5 people, who were asking you for something that
 6 would allow the Post Office to tell its side of
 7 the story to the public in June 2014, which you
 8 didn't believe was true or to be the case?
 9 A. Well, look, sir, the position then and now is
 10 completely different. So I can only apologise
 11 to everybody, maybe it's hurt their feelings or
 12 even hurt them deeply, but I can't explain,
 13 sorry.
 14 Q. Can we look at the response from Sophie in
 15 public affairs, at the top of the page:
 16 "Thanks for this, would it be possible to
 17 get the bullets Rodric sent below with the
 18 correct numbers in?"
 19 Then the three questions are repeated, and
 20 she says to you:
 21 "Your para is too emotive for us to use and
 22 so a factual account would be best."
 23 Was it often the case that public affairs
 24 and PR people told you that your copy was too
 25 emotive for them?
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1 A. No. I had very little to do with them, to be
2 honest. I wish I had even less.

3 Q. It's normally the other way round, isn't it? PR
4 people are trying to get you to give good copy,
5 say things that aren't emotive?

6 A. I'm sorry, sir, I can't answer that. I don't
7 have much dealings with them. I don't have much
8 experience with them so that was the first
9 experience and probably the last, and I'm happy
10 with that.

11 Q. She was asking you just to give her the facts,
12 not to overlay emotion onto it, wasn't she?

13 A. I don't know what she was asking. It's such
14 a long time ago, I have no idea. Hard to
15 explain that to you but not -- that was never my
16 motive from the outset, up to now.

17 Q. By the time you wrote your email, in June 2014,
18 where you cut and pasted your email of four
19 years earlier, from the last day of the trial,
20 that we looked at this morning, you knew about
21 the Helen Rose report, didn't you?

22 A. I know it was set up. I know they wanted some
23 help to help her to -- needed some help. That's
24 about it. I don't think I had much more to deal
25 with it. I had, by that time, I think

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1 time.

2 Q. Had the Post Office been able to find an expert
3 that would stand up in court and back the
4 Horizon system by June 2014?

5 A. I -- again, it's a matter for Cartwright King.
6 It wasn't a matter for me. They were physically
7 and practically involved in finding it and
8 finding it suitable for the Post Office to
9 authorise and approve and pay for, to deal with
10 it. But I didn't have any dealings with it.

11 Q. You were overseeing their work, weren't you?

12 A. Only a matter -- no, no, I wasn't.

13 Q. What were you doing?

14 A. I was helping the Post Office. As I tell you,
15 there was too many other --

16 Q. Sorry?

17 A. There was other pressing matters.

18 Q. What was more pressing than the possible
19 wrongful conviction of dozens or even hundreds
20 of subpostmasters?

21 A. That side of it was taken over by the QC, at
22 that time, Brian Altman. You had, you know,
23 senior clerks -- senior barristers, counsel from
24 Cartwright King, and I think they had a few
25 other people involved. They had the senior

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1 Cartwright King had taken care of the
2 prosecution side of it because I didn't have the
3 capacity or know-how or support to deal with it,
4 so they basically were dealing with the
5 prosecution side of it. They were dealing with
6 her directly.

7 Q. You knew by then that Simon Clarke had advised
8 that Mr Jenkins was a discredited witness who
9 had breached his obligations as an expert
10 witness --

11 A. Yes.

12 Q. -- and that the Post Office that breached its
13 obligations of disclosure as a prosecutor,
14 didn't you?

15 A. Yes, I did, yes.

16 Q. You knew that those points applied in Seema
17 Misra's case, didn't you?

18 A. I think it applied all over the board. I mean,
19 I -- you know, from the outset, of the
20 installation of the actual system itself, yes.

21 Q. You knew the Post Office had stopped prosecuting
22 because it had been unable to find an expert
23 that would stand up in court and back the
24 Horizon system, didn't you?

25 A. No, I wasn't involved in the prosecution at that

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1 management involved. As you will probably see,
2 a lot of this email I'm not cc'd in, so no.

3 Q. So, given that you knew that Simon Clarke had
4 advised that Mr Jenkins was a discredited
5 witness who had breached his obligations as
6 an expert witness and that the Post Office had
7 breached its disclosure obligations as
8 a prosecutor, and that those two points applied
9 in the Seema Misra case, why were you churning
10 out the same old PR message?

11 A. I don't know. I can't answer that because
12 I can't explain it to you years -- you know,
13 years and years ago.

14 Q. That had previously been an internal message,
15 hadn't it?

16 A. Yes.

17 Q. But you were now repurposing it for public,
18 external consumption, weren't you?

19 A. Absolutely not. If I'd known that, then
20 I wouldn't have done. This is internal team and
21 it's not just for communication; it's for other
22 people as well. I mean, I wasn't involved in it
23 and I was cc'd in and I told them what the
24 position was in the *Misra* case, that's all --
25 how the results came out and what results were,

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1 basically updating them to whatever the
2 conclusion of the case was.
3 **Q.** Can we go to what your reply was to Sophie's
4 suggestion that your paragraph was too emotive
5 to use and ask for a factual account instead.

6 Page 1 of this email chain, then if we scroll
7 down. Your email back to her, to Sophie, with
8 other people copied in, including Chris Aujard,
9 you say:

10 "Sophie
11 "Mrs Misra continues to protest her
12 innocence via the media. The summary below
13 shows that there was ample evidence to justify
14 a conviction."

15 Then if you just look at the document,
16 paragraphs 1, 2 and 3, and then if you go over
17 the page and then just scroll through it,
18 please. Then you sign it off "Hope it helps".

19 First of all, who actually drafted this
20 email?

21 **A.** Various people. I had a -- there was various
22 people involved in drafting. It's not just --
23 it was -- err --

24 **Q.** It appears to contain no spelling mistakes or
25 missing words, which, if you'll forgive me for

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1 **A.** No, no. I --

2 **Q.** So this tends to suggest it is somebody else who
3 is writing it?

4 **A.** Possibly, yes. To be honest, I -- now that you
5 mention it, you keep -- you know, you've got the
6 time to analyse it, scrutinise it but, at that
7 time, it was difficult, I mean, to do what did,
8 for an individual, it was next to impossible.
9 So you had people assisting, helping, putting
10 stuff together.

11 You're right on that but, certainly, Jo
12 Hamilton case, Noel Thomas case, I've never
13 dealt with them. I don't know --

14 **Q.** Can we go to page 5, paragraph 20, please. Your
15 email says:

16 "Horizon is a complicated computer system
17 about which even eminent experts can make
18 mistakes. There was no reason to doubt
19 Professor McLachlan's expertise and good faith
20 but time and time again he had to be corrected
21 by Mr Jenkins. Professor McLachlan is not the
22 only expert to have misunderstood Horizon.

23 I have spoken to colleagues who prosecute these
24 cases and they have come across other experts
25 who have also fallen into error. I can say that

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1 saying, is your normal way of writing, ie with
2 spelling mistakes and missing words, and it
3 doesn't appear to be in your style of writing.

4 **A.** I can't help you on that. I don't know, but
5 there's -- it's such a long time ago. I mean --
6 I have no idea. But there are, you know, it's
7 a teamwork. It's not one individual to put it
8 all together and the other thing is I'm not
9 a good typist, as you probably worked out. I'm
10 used to dictating work, and I don't -- it
11 probably had gone to somebody to have it typed
12 for me to approve with a few others.

13 **Q.** Can we look at some of the other contents to see
14 whether it helps you. Page 4, paragraph 18,
15 please, the author says:

16 "The two criminal files I looked at are of
17 some significance. Jo Hamilton and Noel Thomas
18 have been prominent critics of Horizon in the
19 media. Their cases were similar to Mrs Misra's.
20 Both were [subpostmasters] who chose to hide
21 deficiencies by false accounting over a long
22 period of time, rather than declare their
23 losses", et cetera.

24 Is that something that you did, look at the
25 criminal files of Jo Hamilton and Noel Thomas?

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1 both sides in *Misra* were completely beholden to
2 Gareth Jenkins and his deep knowledge of
3 Horizon."

4 Again, is that you speaking there? "I have
5 spoken to colleagues"?

6 **A.** Possibly not. Haha, I don't know.

7 **Q.** Or is it somebody else?

8 **A.** I have -- my job was enjoyable because I was
9 talking to a lot of people, I was gaining a lot
10 out of it. It was stretching. It was
11 complicated. But that's the sort of thing
12 I enjoy. So it was enjoyable in that sense but
13 I can't say to you -- that certainly -- you
14 know, that more or less goes back to the fact
15 that there was a number of people involved in
16 assisting and advising and putting these sort of
17 things together.

18 **Q.** So this might be you actually writing this?

19 **A.** No. Maybe a contribution towards it. There's
20 a lot of people making contributions towards
21 these things --

22 **Q.** At the moment, Mr Singh, I'm just trying to work
23 out, by taking you to bits of this email, to
24 help you to work out whether this is your work
25 or whether you've cut and pasted something else

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1 that somebody else has said and repurposed it
 2 for yourself.
 3 **A.** Well, as you know, I mean when you do this work,
 4 you obviously do have help and, certainly, I had
 5 a lot of help over that period because it was --
 6 **Q.** I'm asking about something different, which is
 7 cutting and pasting somebody else's work --
 8 **A.** Yeah.
 9 **Q.** -- and passing it off as your own.
 10 **A.** Yeah, you will get a lot of that everywhere and
 11 certainly the work I deal with, that was the
 12 only way I could cope with it and deal with it
 13 and I did and that probably was a paragraph from
 14 somewhere or probably a lot more than
 15 a paragraph, might be quite a few from it, and
 16 maybe I asked somebody "Look, the *Misra* case,
 17 can you help me, can you highlight or bullet
 18 point the lessons we learnt from the *Misra*
 19 case?" Yes.
 20 **Q.** Which other lawyers, other than you and Warwick
 21 Tatford, were involved in the Seema Misra case?
 22 **A.** I think Rob Wilson, Juliet McFarlane, maybe
 23 Debbie -- I don't know what was -- she's changed
 24 her name now, hasn't she?
 25 **Q.** Debbie Stapel?

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1 Somebody has got to put their name to it and, if
 2 it wasn't me, it probably would have been
 3 somebody else.
 4 **Q.** But in that case, you would say at the beginning
 5 "This is a summary with multiple contributions.
 6 I, Jarnail Singh, can't vouch for everything"?
 7 **A.** Sir, you would do because you're such a wise and
 8 experienced practitioner. But when you come to
 9 my level --
 10 **Q.** Did you lack experience and lack wisdom; is that
 11 what you're saying?
 12 **A.** No, no, my level is different.
 13 **Q.** Sorry?
 14 **A.** It's a different level. It's a different degree
 15 of work. Certainly, you know, if I was doing it
 16 now, then I probably would have done but, at
 17 that time, there is pressure of time, and
 18 there's other matters to be dealt with. People
 19 wanted these sort of advices, these sort of
 20 prompters, yesterday, not today, not in seven
 21 days' time, not in 14 days' time. So what you
 22 do or what I did was to get help and put
 23 something together to pass it on.
 24 **Q.** Can we go back to the beginning of the email
 25 then and look at the content. Page 1, please:

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1 **A.** Staples (*sic*). I don't know. Certainly maybe
 2 somebody else from Bell Yard. Certainly the two
 3 legal executives, the Investigation Officer.
 4 You name it, it was a big team because it was
 5 a big -- it was just unmanageable. I mean, the
 6 Post Office is so vast, to deal with it as one
 7 individual, it's --
 8 **Q.** I'm looking at potential authors because the
 9 person --
 10 **A.** Ah, I'm giving you the -- you know, given you
 11 basically, you know --
 12 **Q.** You were happy to put your name to this and say
 13 you own this email and the contents of it,
 14 weren't you?
 15 **A.** Well, I was happy to put my name to it, purely
 16 because a lot of it -- you know, from again the
 17 *Misra* case, I didn't go to court for seven days.
 18 I think I started it off, certainly I had a lot
 19 of counsel's opinions and views and advises on
 20 it, as you know. But certainly --
 21 **Q.** Mr Singh, you wouldn't write an email with all
 22 of this content unless you were happy with the
 23 content, would you?
 24 **A.** Well, like I said to you, these things work
 25 purely because it's not for one individual.

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1 "Mrs Misra continues to protest her
 2 innocence in the media. The summary below shows
 3 there was ample evidence to justify
 4 a conviction."
 5 That was still your belief, was it, in June
 6 2014?
 7 **A.** No.
 8 **Q.** Why did you very it then?
 9 **A.** Because that was the job I was asked to do.
 10 I was asked to summarise it.
 11 **Q.** It was your job to say things you didn't
 12 believe?
 13 **A.** Well, I -- I can't answer that. I mean, you
 14 know, at that time I wrote it and now, I regret
 15 it, I suppose.
 16 **Q.** I'm asking you why you wrote it. Not whether
 17 you regret it now?
 18 **A.** I don't know. It was -- I was asked to
 19 summarise it, and the -- you know, with the help
 20 of other people, I summarised it. So you asked
 21 earlier why didn't I put a summary. There it
 22 is, the summary below shows, and a lot of the
 23 people who made a contribution towards it
 24 obviously made a contribution to assist me at
 25 that time.

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1 Q. But you're adopting this as your work. There's
2 nothing on this that tells the reader that this
3 isn't you speaking here?

4 A. No. When you do work, you have a lot of
5 researchers, don't you? Do you actually put
6 their names to every single thing, that certain
7 people made a contribution towards it? It's
8 a team effort. People know whose work it is
9 because they worked with me at that time. It
10 wasn't an individual. I couldn't sit down and
11 churn that out within, I don't know, two hours
12 or three hours or a day, when I was asked to do
13 it. So the only way I could get the work done,
14 it was to, you know, seek a contributions from
15 the people who could help, and they did and here
16 we are.

17 Q. You say:

18 "The *Misra* case at Guildford Crown Court in
19 2009-2010 as far as I am aware, is the only
20 criminal trial where a jury has been required to
21 consider in detail the integrity of the Horizon
22 system."

23 Paragraph 2 is a cut and paste of your
24 earlier email. 3:

25 "Mrs Misra claimed that, although she was
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1 protest her innocence via the media and that she
2 is one of number of vocal critics of Horizon.
3 It is perhaps worthwhile setting out the facts
4 of her case and what happened at trial because
5 some of the critical reports of the case have
6 not been accurate."

7 You set out in paragraph 6 what happened in
8 the audit.

9 In 7, a plea and case management hearing.

10 Then 8:

11 "When Mrs Misra's case was listed for trial
12 in June 2009 she brought to Court material from
13 the Internet detailing number of complaints
14 about the Horizon system made by former
15 subpostmasters. The Post Office Limited agreed
16 to an adjournment of the trial to allow the
17 Defence to pursue this line of inquiry, even
18 though it was likely that Ms Misra was jumping
19 on a bandwagon now that she had realised her
20 original defence didn't work."

21 So it was still your view in 2014 that
22 Mrs Misra was a bandwagon jumper; is that right?

23 A. I think hindsight is -- if I'd known what
24 I known now, then, obviously, no, but the thing
25 is then -- no, that was not the case, but it
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1 guilty of false accounting, she had not stolen
2 the money whose loss she had concealed. She
3 suggested that one possible reason why the money
4 appeared to be missing might be computer error.
5 The jury heard from expert witnesses for the
6 Crown and Defence. Their evidence was
7 sufficiently detailed as to have lasted two full
8 days. The jury's verdict showed that it was
9 sure that computer error played no role in the
10 case. There has been no appeal against
11 conviction."

12 Then over the page, please:

13 "The Defence made very wide ranging requests
14 for disclosure and the prosecution was asked to
15 review material relating to a number of other
16 offices where subpostmasters had made complaints
17 about Horizon. That disclosure process was
18 fraught with difficulties, mainly because the
19 disclosure requests were unfocused and often
20 irrelevant. If we had complied with every
21 disclosure request, the Investigation Department
22 would probably have been paralysed for six
23 months, the investigators being unable to deal
24 with any other work.

25 "I am aware that Mrs Misra continues to
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1 was, like I said, a teamwork or people who knew
2 the -- knew the case, made a contribution
3 towards it, and I think it was decided to put it
4 in.

5 But, certainly, you know, it wasn't my
6 decision to put it in. Let's put it that way.
7 I certainly wouldn't have -- wouldn't have
8 thought of that, originally, now or any time,
9 because that's not the way I write. I mean as
10 you know -- rightly say, I'm not that good at
11 typing, I'm not very good at putting something
12 like that together but that's why I'm probably
13 one of those that can't work without a team.

14 I'm not a guy who can just come and work.
15 I need -- every time I did something in life,
16 I would certainly -- in the profession, I always
17 had people around me. I mean, I can do certain
18 things very well certain things not so well, and
19 if I don't, I have people who can. So I put
20 it -- put a sort of team together to do, to be
21 able to exist and then certainly hopefully to do
22 a job or do the work to a high standard, and
23 that's what I've done. It was a team effort.

24 Q. You continue in paragraph 9:

25 "Mrs Misra changed solicitors and there then
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1 followed a difficult period when [Post Office
 2 Limited] was subjected to an avalanche of
 3 disclosure requests. We were also served with
 4 a series of so-called 'interim reports' by
 5 a newly instructed defence expert called
 6 Professor Charles McLachlan. These reports
 7 raised theoretical possibilities of things that
 8 might go wrong with Horizon. The reports
 9 contained no evidence for the theories and no
 10 explanation as to why any of these theories
 11 might be relevant to the West Byfleet office.
 12 Our efforts to control these disclosure requests
 13 fell on deaf ears. We repeatedly made the point
 14 that the case was not about whether the Horizon
 15 system was perfect. No computer system can be
 16 in perfect and errors can arise on any system.
 17 The issue was whether anything had gone wrong at
 18 West Byfleet. The person who would know that
 19 was Mrs Misra. At the very least she should be
 20 able to identify what sort of problems she had
 21 encountered and where on the accounts the
 22 deficiencies were emerging. She would know this
 23 because she would have physically checked the
 24 stock against the computer records."

I'm going to come back to that belief that
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1 could have contributed to the deficiency.
 2 "In his evidence to the jury Professor
 3 McLachlan conceded that all of the theoretical
 4 problems he had raised were now irrelevant. He
 5 abandoned most of his theories after being
 6 assisted to a better understanding by
 7 Mr Jenkins. Other theories he had checked
 8 against the transaction logs and found to be
 9 baseless. In a nutshell his final conclusion
 10 was this: he hadn't found any problem but there
 11 might still have been a problem that he and
 12 Jenkins might have missed. The jury clearly
 13 rejected this as wishful thinking, after
 14 considering all of the evidence in the case."

13, about three lines in:

16 "She [Mrs Misra] was on the scene to witness
 17 the symptoms of any computer problems while the
 18 experts could only trawl through the data long
 19 after the event. Any sensible [subpostmaster]
 20 would have hunted high and low to ascertain
 21 where in the accounts the losses were occurring.
 22 A [subpostmaster] should be able to find the
 23 location of the problem even if they could not
 24 solve it. Mrs Misra had not made any such
 25 rigorous checks. She had simply accepted each

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1 you had that it's the subpostmaster who would
 2 know most about the operation of Horizon, later:
 3 "10. It emerged in the trial that in spite
 4 of our requests for a focused approach defence
 5 expert Professor McLachlan had never sought any
 6 information from Mrs Misra. His theories were
 7 simply his own. Mrs Misra had given him no
 8 guidance whatsoever as what might be going wrong
 9 at West Byfleet.

10 "[The Post Office Limited] instructed their
 11 own expert, Mr Jenkins, from Fujitsu. This was
 12 a turning point in the case. Professor
 13 McLachlan fairly conceded that Mr Jenkins had
 14 given him very great assistance in understanding
 15 Horizon. Mr Jenkins was able to explain to
 16 Professor McLachlan how many of his theories
 17 were not valid and based on a misunderstanding
 18 of Horizon. Mr Jenkins advised that the only
 19 way to assess any problems at West Byfleet was
 20 to obtain the transaction logs and to examine
 21 them for potential problems. Obtaining the logs
 22 was expensive and their analysis was time
 23 consuming. However, after both experts had
 24 completed their analysis, neither could find
 25 evidence of any computer error whatsoever that

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1 loss rather than declare the deficiency in the
 2 monthly balance, as she was required to do, she
 3 had hidden it by false accounting."

Over the page. If we go to paragraph 17:

5 "It can be seen from this summary that there
 6 was ample evidence to justify a conviction. The
 7 jury was entitled to conclude that there was
 8 only one sensible reason for Mrs Misra to cook
 9 the books: to hide her own stealing. An honest
 10 [subpostmaster] would have reported the loss
 11 immediately. This is what they are required to
 12 do. It is also the obvious step out of
 13 self-interest. At the very least it would nip
 14 any problem in the bud and limit the amount of
 15 money the subpostmaster might have to repay.
 16 Also, if a genuine problem was found with the
 17 computer system, there would be no question of
 18 repayment. Mrs Misra claimed that she had not
 19 wanted to lose the Post Office and that is why
 20 she had been so secretive. This ignored the
 21 obvious fact that she had allowed the loss to
 22 grow to such a catastrophic amount that it would
 23 have been better to give the business away. The
 24 jury was entitled to reject her evidence as
 25 absurd and to conclude that her belated attack

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1 on Horizon was nothing but a desperate
 2 distraction [technique]."
 3 Was that your view, in June 2014, that
 4 Mrs Misra's questions as to the integrity of the
 5 Horizon data were nothing but a desperate
 6 distraction tactic?
 7 **A.** Well, no.
 8 **Q.** So why did you write it?
 9 **A.** I didn't. It was -- as I say, it was a team
 10 effort as a unit. Somebody wanted a summary of
 11 what happened in year 2012 -- year 2010, at the
 12 trial, and that's basically bringing them up to
 13 date to what happened in the *Misra* case.
 14 **Q.** So who in the team was responsible for this
 15 effort?
 16 **A.** It was joint effort, put together by number of
 17 people, I think. I more or less told you the
 18 people who were involved in it, who had a hand
 19 in it and that's basically all I can help assist
 20 you with.
 21 **Q.** Was it representative of an underlying
 22 assumption by that team, even in June 2014, that
 23 subpostmasters raising Horizon Issues during
 24 investigations were lying about the causes of
 25 losses at their branch and were doing so as part
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1 information about your matters.
 2 "Could you please create a list of your top
 3 5 matters including a short description of each
 4 matter."
 5 Yes.
 6 **A.** Yes.
 7 **Q.** Then can we go to page 2, please. Can we see
 8 your reply, to Renata and to Piero:
 9 "Renata
 10 "Please see below Top five matters in
 11 Criminal prosecutions."
 12 Yes?
 13 **A.** Yes.
 14 **Q.** If we scroll down, please, number 1 is "Auditors
 15 Training".
 16 **A.** Yes.
 17 **Q.** If we go over the page, at the bottom of the
 18 page, I don't think it's in bold, number 2 is
 19 "Scotland".
 20 **A.** Yes.
 21 **Q.** Number 3 is "Expert". One of the important
 22 issues has been to locate a suitable expert and
 23 instruct them, I translate that as.
 24 **A.** Yes.
 25 **Q.** "Identified an expert. Accompanied [Cartwright
 115

1 of a distraction technique?
 2 **A.** No.
 3 **Q.** Can we move, please, to POL00108394.
 4 Can we look, please, at page 4, please, and
 5 scroll down, please. Can we see this is
 6 an email to you of March 2014 from --
 7 **A.** Yes.
 8 **Q.** -- a paralegal --
 9 **A.** Yes.
 10 **Q.** -- Renata Prywerek?
 11 Did Renata Prywerek work in Post Office
 12 Limited Legal, or Royal Mail Group.
 13 **A.** No, Legal. She assisted all of us in the team.
 14 I think those are the names of all the people in
 15 the team.
 16 **Q.** She says:
 17 "Hi all
 18 "I have been asked by Piero ..."
 19 Who was Piero?
 20 **A.** I think -- I don't know -- '12, '14, maybe -- he
 21 may have been a joint team leader or head of
 22 legal when Hugh, I think, left by then. So
 23 I suppose he was a joint Head of the Legal Team
 24 at the Post Office Limited.
 25 **Q.** "I have been asked by Piero to collect
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1 King] to a number of meetings with expert and it
 2 is hoped expert [will] be instructed shortly.
 3 "In these meetings discussed important
 4 issues and assisted in briefing of the expert.
 5 "By liaising with different areas of Post
 6 Office Limited gathering information on
 7 technical aspects and funding and Fujitsu as
 8 appropriate and liaising between external
 9 lawyers and internal Post Office Limited
 10 departments.
 11 "Feeding information to experts, who then
 12 become better informed to be able to deal with
 13 Horizon issues/scope.
 14 "Current and ongoing prosecutions cannot
 15 [recommence] until instruction [of] independent
 16 [Post Office Limited] computer expert is
 17 instructed and his report is [in] hand."
 18 **A.** In hand, yes.
 19 **Q.** Yeah? How many experts did you approach?
 20 **A.** I didn't personally approach any.
 21 **Q.** How many meetings did you attend of experts that
 22 were approached?
 23 **A.** That was left in the capable hands of Cartwright
 24 King and, I think, Simon Clarke was basically
 25 given the task but I don't know what he did but,
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1 certainly, you know, that's what it was.

2 **Q.** You say here that you accompanied Cartwright
3 King to a number of meetings?

4 **A.** I --

5 **Q.** How many experts did you attend upon?

6 **A.** I personally -- I think probably one or two, but
7 a lot of it was their CVs, I think they passed
8 it over to me. But it was tasked for Cartwright
9 King because they had the experts there, they
10 wanted to know what they were looking for.
11 They're the ones who will prosecute or not
12 prosecute. They're the ones who would advise on
13 those things, so it was left in their capable
14 hands.

15 So this is basically a one-to-one. I mean
16 she wanted to know five matters I'm involved in
17 and I gave her five matters.

18 **Q.** They're all about Horizon, aren't they?

19 **A.** Well, yeah. I suppose, yes.

20 **Q.** "4. [Post Office] Mediation Scheme."
21 Then:
22 "5. Revised Prosecution Policy and Future
23 of [Post Office Limited] Prosecutions."
24 You say:
25 "Post Office Limited has an in-house
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1 cultural shift within the business, greater ever
2 assist will be placed on fraud prevention and
3 early intervention activities. It is envisaged
4 that a number of fraud risk programmes will be
5 initiated this year driven by emerging patterns
6 ... the success of these programs will only be
7 achieved by collaborative approach with other
8 Security strands and key stakeholders."
9 You're reflecting here that there was
10 a fundamental shift in 2014 to the approach to
11 prosecutions, aren't you?

12 **A.** That's what I put -- that's what --

13 **Q.** That's true, there was a fundamental shift,
14 wasn't there?

15 **A.** That's what the business decided. I mean,
16 I think it was probably at other meetings, or
17 whatever it is, but it's not my decision, it's
18 what the business was going to do, or what going
19 to do. I don't know. I mean, I'm not part of
20 the management. I'm not part of the board,
21 the -- maybe one of the meetings, I was part of,
22 and that's what they decided what -- the way
23 they were going to go.
24 So all I'm doing is putting down -- putting
25 down is one of the things I'm working or part
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1 security and prosecution team. As part of its
2 remit it undertakes investigations and where
3 deemed appropriate will undertake criminal
4 prosecutions in line with the business
5 prosecution policy. If an incident is
6 considered to have sufficient evidence to
7 prosecute, it is passed to the Post Office
8 Limited Legal team for review and consideration
9 against the evidential and public interest
10 tests. Legal teams recommendations are then
11 passed to the Head of Security and if satisfied,
12 he will then make a decision on prosecution."
13 Then you say:
14 "a) There is no doubt that this year will be
15 the most challenging in terms of number of key
16 factors; the findings of the Second Sight
17 review; the £20,000 threshold on anomalies for
18 potential audit and prosecutions policy and
19 significantly proposals have been submitted for
20 Contract Advisers not to precautionary suspend
21 as a matter of course, without first considering
22 whether or not the subject [remains] in the Post
23 Office.
24 "b) Following the Second Sight review and
25 revised prosecution policy with the resultant
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1 of.

2 **Q.** Prior to that time, had the Post Office enjoyed
3 a culture of prosecuting cases?

4 **A.** Oh, was that a question, sorry?

5 **Q.** Yes.

6 **A.** You have to ask --

7 **Q.** The senior lawyer within the Criminal Law Team?

8 **A.** Maybe I'm a senior lawyer, maybe that's just the
9 title but I didn't get involved in any of that.
10 I don't know what it is, I think it is probably
11 somebody like Rob Wilson, maybe somebody -- you
12 had Mr Marsh, who was Head of Security, maybe
13 somebody from the board, maybe -- whatever it
14 is. But I don't -- I can't answer that question
15 because I don't know. I wasn't part of it.
16 But all I can tell you is that the reason
17 why it's there, because obviously I was told
18 that's what they -- they were going to do, going
19 forward. You know, what the future looked like.

20 **Q.** Prior to this shift in prosecution policy, were
21 criminal investigations and proceedings launched
22 without a proper basis?

23 **A.** Of course not. I wouldn't -- no, no.

24 **Q.** Why was a change necessary, then?

25 **A.** I don't know. As I said to you, I wasn't
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1 involved in the first incident of what you're
2 describing as, I don't recognise it. And the
3 second bit is I'm highlighting what I've been
4 told. You know, that's what the Post Office
5 wanted to do and I'm just saying "Well, that's
6 what the Post Office wanted to do in the future,
7 or presently", or -- but I can't answer that
8 because I was not part of any decision making,
9 wasn't part of -- in the management of. I'm
10 just a little bit, more or less a case worker,
11 in the sense I described in my statement.

12 **Q.** If we go over the page, please, to (c):
13 "Cases will only be raised for criminal
14 investigation once all alternative avenues which
15 may culminate in a successful outcome have been
16 explored and dismissed. The decided course of
17 action needs to be proportionate, justified and
18 necessary. Cases raised for investigations will
19 be limited to those likely to seriously damage
20 the brand or reputation of the Post Office.
21 Other cases will be considered where there's
22 a clear and obvious business need to conduct
23 a criminal investigation."

24 Who decided that cases raised for
25 investigation would be limited to those likely
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1 then, that prosecutions would be launched if
2 they damaged seriously the brand or reputation
3 of the Post Office?

4 **A.** Well, I think again, it's not down to me.
5 I don't think I was part of it. I was probably
6 told about it. It would be the Head of Legal,
7 the board, maybe Head of Security. Certainly,
8 you know, you probably have seen so much work,
9 so much is emailed. I'm not probably copied
10 into most of it. I mean, I'm copied in as and
11 when they need some advice or assistance on the
12 legal front but, even on the legal front, I'm
13 passing it over to Cartwright King because
14 they're more handle because they're actually
15 dealing, physically dealing with the prosecution
16 on our behalf.

17 **Q.** Why were decisions as to whether to launch
18 criminal investigations and pursuing
19 prosecutions clouded by concerns over the
20 reputation of the Post Office?

21 **A.** I can't help you with that because I don't know.
22 I mean, I'm not part of the -- the thing is that
23 if they flash those words out, it may have some
24 meaning but then a lot of the work at that time
25 and even now is all bullet points and -- you
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1 seriously to damage the Post Office's brand?

2 **A.** I don't know. I mean, presumably the board,
3 presumably the management. Maybe the head of
4 the Legal -- Legal, but certainly this is,
5 again --

6 **Q.** But this time you were the Head of the Criminal
7 Law Team, weren't you?

8 **A.** I wasn't head of anything, to be honest with
9 you. I just went in as a challenge, as
10 an opportunity and I can reassure you I was not
11 Head of Criminal Law.

12 I think the outside world did, probably did,
13 because I was the only criminal lawyer and
14 I think originally they wanted Rob Wilson to go
15 in, and at the last minute he dropped out, and
16 I was put forward and I think in the last
17 minute, in the last -- I think this post was on
18 1 April '12 and I think I was more or less told
19 the end of March, probably the middle of March,
20 "Do you want it?"

21 And I considered it, went to see Cartwright
22 King, I liked it and I knew it would be tough,
23 so I took that opportunity as a challenge and
24 that's what I did.

25 **Q.** Who at the Post Office was driving the message,
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1 know, so you need some sort of content to it,
2 some sort of background to understand what it
3 always means. But I wasn't part of any of that,
4 as to why they decided to do what they did,
5 decided to do.

6 **Q.** Can we turn please to POL00127280 and look at
7 page 2, please, and scroll down, please. Can we
8 see an email from you here to Angela van den
9 Bogerd, of May 2014?

10 **A.** Yes.

11 **Q.** In the second paragraph, you say:

12 "There will be cases in which it will be
13 clear from the outset that [Post Office Limited]
14 will need to conduct [a] criminal investigation
15 with [a] view to potential prosecution to
16 protect [the Post Office Limited] brand and
17 reputation and for business purposes."

18 Why would the protection of the Post Office
19 brand and reputation be a relevant consideration
20 in deciding whether to prosecute?

21 **A.** I've told -- you know, I've repeated it many
22 times. I have been told that's what they wanted
23 to do. All I'm doing is highlighting it to the
24 rest of the team, as to where they're going.
25 I mean, as to whys and hows and the purposes,
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1 I wasn't the person to give you the answer to
2 that. I don't know who -- where you would be
3 able to get the answer now. I don't know who
4 else is coming to give evidence to the Inquiry
5 but, certainly, I can't assist you any more than
6 what I have. All I've done is highlighted
7 where -- what the Post Office wanted to do and
8 how they want to do it.

9 **Q.** What were the business purposes you referring to
10 there when you say that "sometimes there will be
11 cases where a criminal investigation with a view
12 to potential prosecution needs to be commenced
13 for business purposes?" What were the business
14 purposes?

15 **A.** I don't know.

16 **Q.** What business purposes could justify a criminal
17 investigation?

18 **A.** 7 May 2014 -- I don't know. I mean, I -- you
19 know, such a long time ago. I've been away from
20 this sort area of work and, certainly, the Post
21 Office, for a long time, and I've been involved
22 in other matters, other legal work. I can't,
23 you know, say hand on heart, to tell you exactly
24 what it was because I don't -- I don't remember
25 as to what the purposes were. I've forgotten

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1 that way. I mean, my thing was --

2 **Q.** If we've ruled out those two things, the
3 business purpose of protecting the integrity of
4 Horizon, and the business purpose of recovering
5 debt from subpostmasters as a motivator or
6 a relevant consideration for prosecution, what
7 were the business purposes to which you're
8 referring?

9 **A.** I'm not referring to anything. All I'm doing is
10 repeating what I've been told to tell the rest
11 of the team.

12 **Q.** So just following orders, really?

13 **A.** Yes.

14 **MR BEER:** Thank you very much.

15 It's 1.20, sir. Might that be an
16 appropriate moment to break? Could I ask that
17 we come back at 2.10, please?

18 **SIR WYN WILLIAMS:** Yes, fine.

19 **MR BEER:** Thank you very much, sir.

20 (1.20pm)

(The Short Adjournment)

22 (2.10 pm)

23 **MR BEER:** Good afternoon, sir, can you see and hear
24 me?

25 **SIR WYN WILLIAMS:** Yes, I can, thank you.

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1 about it. That's the past. It's been left
2 there.

3 **Q.** Earlier in the piece, between, say, 2000 and
4 2012, were business purposes brought into
5 account when deciding whether to prosecute or
6 not?

7 **A.** I think the -- the -- I don't know. I mean,
8 I don't know. I mean I -- you know, it's such
9 a long time ago. You know, to try to explain it
10 all to you would be wrong of me to tell you
11 because I can't honestly answer that.

12 **Q.** Was one of the business purposes you're
13 referring to there the protection of the
14 integrity of the Horizon system --

15 **A.** I don't know. Only the person who --

16 **Q.** -- ie we'll prosecute --

17 **A.** -- who made the decision would know. I don't
18 know what they were thinking, or the reason for
19 it being there.

20 **Q.** Was one of the business purposes debt recovery
21 using criminal prosecution in order to recover
22 debt from postmasters?

23 **A.** I don't -- personally, no, but I don't know what
24 the other people thought or why they did what
25 they did, but I certainly didn't think of it

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1 **MR BEER:** Good afternoon, Mr Singh. Can we pick up,
2 please, with POL00101851, please, and start by
3 looking at pages 2 and 3.

4 Let's start on 3, and scroll down, please.

5 Can we see this is an email signed off by Nick
6 Wallis, the journalist, and scroll up, please,
7 and if we look at the date of the email it's
8 initially to Melanie Corfield, asking for
9 an interview and he says:

10 "Thank you for your help with The One Show
11 transmitted on Tuesday, 9 December. We're now
12 preparing a second film which is due to go out
13 on The One Show on BBC One at around the same
14 time next week. We would be most grateful if
15 the Post Office would be prepared to offer
16 an interview expressing its view in the
17 continuing dispute with some subpostmasters over
18 Horizon and associated issues.

19 "2) The film we're broadcasting once again
20 refers to concerns over Horizon. This time it
21 features the story of Steve Phillips from Nelson
22 in South Wales, as well as interviews from
23 a group of former subpostmasters, including Noel
24 Thomas, Jo Hamilton, Julian Wilson, who say they
25 felt under pressure to sign off incorrect

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1 accounts even though they did not understand how
2 sums could be missing.

3 "3) In our film former postmasters say it is
4 difficult to investigate the causes of
5 shortfalls for which they are held liable,
6 because of the way Horizon and associated Post
7 Office processes and policy function. They say
8 in order to open for business the day after the
9 close of a trading period they had to agree to
10 pay back alleged shortfalls (either by settling
11 to cash or settling centrally, which implies
12 payment later). They say this put them in
13 a very difficult position", et cetera.

14 Then, if we scroll up the email, please, and
15 just a little bit more. Thank you. You'll see
16 Melanie Corfield forwards it to Belinda Crowe,
17 Mark Davies, Patrick Bourke, Rod Williams, Ruth
18 Barker, Tom Wechsler, copied to Angela van den
19 Bogerd:

20 "To see below. Can I suggest we have
21 a meeting/call to discuss please.

22 "Copying Angela to see if we can get any
23 knowledge about Steven Phillips -- looks as
24 though he is a serving subpostmaster. The other
25 allegations and accusations are all themes we

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1 in, into -- I can't -- I don't know what the
2 answer to that is.

3 **Q.** Who was leading on the development of robust
4 lines within Post Office at this time?

5 **A.** I was told the Communication Team, presumably,
6 community -- community -- Communication Team,
7 and presumably higher management or the board or
8 Chief Executive, I presume. I certainly wasn't.
9 By that time, every time something happened,
10 I just went through our external lawyers because
11 they're the ones who were actually prosecuting
12 or deciding on issues to do with, you know, the
13 way they were going to deal with the
14 subpostmasters going forward or presently.

15 **Q.** This isn't about prosecuting; this is about
16 promulgating robust lines to a journalist who is
17 about to broadcast a programme on the BBC, on
18 BBC One.

19 **A.** I can only assume, I mean I can't assist you
20 either way, presumably it was the Communication
21 Team. That's their job, isn't it, or that's
22 what they're employed for but, certainly --

23 **Q.** They're employed to communicate and to develop
24 communication strategies and they're employed
25 for media relations reasons. They're not

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1 have robust lines about and also of course that
2 we are preparing for Jo S.

3 "But I think we need to be extremely robust
4 about opinion from specialists who have not been
5 involved in this and are commenting from the
6 sidelines."

7 Then scroll up a little further, please. We
8 can ignore that email. A little bit further.

9 At the top, Rod Williams says to the copy list:

10 "Please copy Jarnail."

11 Indeed, you are then added to the copy list,
12 can you see that?

13 **A.** Yes.

14 **Q.** Just going down to the top of page 2, please.

15 The line "The other allegations are all themes
16 we have robust lines about and we need to be
17 extremely robust about opinion from
18 specialists", is it your recollection that, at
19 this time, this is December 2014, that was still
20 the Post Office's position?

21 **A.** To be honest, I can't say "yes" or "no" to that.
22 I don't know. I don't know what there was. As
23 I said, at that time, I more or less was
24 an observer. There were so many things going,
25 so many people doing things. I wasn't copied

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1 employed of their own volition to develop --

2 **A.** No.

3 **Q.** -- robust lines; they've got to come from
4 somewhere, haven't they?

5 **A.** Yes, it's not coming from me. It's above my
6 head. I mean, I don't know how this thing
7 works. That's what I'm saying to you, sir,
8 I don't know.

9 **Q.** Why were you, at this stage, copied in on this
10 chain, ie the development of robust lines ready
11 for a BBC One broadcast?

12 **A.** Presumably from a criminal aspect, criminal law
13 aspect of it because the guy who said that
14 I should be copied in presumably had been asked
15 from a civil litigation point, this is the
16 criminal litigation side of it. So that's
17 probably why he said, well, maybe we ought to
18 get another person on board who can give you
19 other aspect of the -- you know, this side of
20 it.

21 **Q.** Or is it because, at this time, December 2014,
22 you would have continued to say what we've seen
23 in all of the emails we've seen this morning:
24 that subpostmasters are guilty?

25 **A.** No.

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1 Q. To the extent to which they raise questions
2 about Horizon, they're jumping on a bandwagon or
3 acting to distract from their own guilt?
4 A. No, I have never held that view. Maybe in the
5 email that's how it comes across but no, the
6 answer is no, no, no.
7 Q. Every email that we've looked at shows that you
8 wrote that. There isn't a single email showing
9 you held the opposite view.
10 A. Do you think --
11 Q. Why is that?
12 A. I don't know. You know, that's -- my answer is
13 no, that's not the view I held from the outset.
14 I never held that view. You're bringing this up
15 over and over again and my answer is no, no and
16 no. I just --
17 Q. Can you try and engage with the question rather
18 than just saying, "My answer is going to be no
19 no and no"? If you genuinely --
20 A. I am engaging but you're repeating the same
21 question about ten different times. The answer
22 is going to be the same, isn't it?
23 Q. If I'm doing anything wrong the Chairman will
24 intervene, so kindly answer my question,
25 Mr Singh?

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1 difficult case.
2 Q. How did they drag you?
3 A. Well, they didn't drag me, in that sense --
4 Q. Why did you just say they dragged you?
5 A. Dragged, in the sense that I was unfortunate to
6 have this case that had all sorts of
7 complications in it. I mean, if it wasn't
8 a straightforward case, then you would have got
9 somebody senior, like, you know, Juliet
10 McFarlane who was the principal lawyer or the
11 Head of Criminal Law. So, no, the answer is to
12 that.
13 Q. Was there, in 2014, December 2014, still a siege
14 mentality within the Post Office: "We need still
15 to be defending the robustness of Horizon"?
16 A. Not from me. I don't know what the other people
17 were thinking or whatever it was, but certainly
18 I -- by that time, I wasn't prosecuting, and
19 I think I was just assisting as and when was
20 required, as you can see from the email.
21 Somebody said, "Well, have you included Jarnail
22 Singh in?" and, all of a sudden, they remember
23 and copy me in.
24 Q. Can we move on, please, to POL00101857. Can we
25 scroll down, please. Can we see an email of

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1 A. Okay.
2 Q. If you held the view -- if you had an open mind
3 about the integrity of Horizon, rather than the
4 view we've seen expressed in countless emails
5 now, why did you not reduce it to writing?
6 A. How do you mean? What do you mean?
7 Q. Sorry?
8 A. Why did I put it in writing?
9 Q. Why did you not put it in writing? If you had
10 a genuinely open mind about Horizon, rather than
11 "Everyone's guilty, if they blame Horizon,
12 they're just jumping on a bandwagon, we'll win
13 a few cases and those people will melt away like
14 the midnight snow", why do we not see any emails
15 to say, "Look, I've got an open mind about this,
16 we need properly to investigate it"?
17 A. Because I'm not involved in that level. That's
18 why, and I've never held that view. I will
19 never hold that view. It's just unfortunate
20 that the -- I was sort of dragged into
21 prosecuting these sort of cases or this
22 particular case --
23 Q. Who dragged you in?
24 A. Well, just it was my case, straightforward case,
25 and it turned out to be quite a complex and

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1 yours of 14 December 2014. You say:
2 "All
3 "My comments on Nick Wallis' One Show email
4 dated 12/12/14 to [Melanie Corfield] by numbered
5 paragraphs as relevant to criminal law are as
6 follows ..."
7 So this is a response to the email that we
8 looked at, yes?
9 A. Yes, yes, yes.
10 Q. You pick up his paragraphs in each case, so his
11 paragraph 3, and you say:
12 "Here there are more options for the
13 [subpostmaster] ..."
14 Then his paragraph 4. His paragraph 4 read:
15 "We asked one former subpostmaster why she
16 pleaded guilty to false accounting in court when
17 she believed herself to be innocent. She told
18 us that she felt she couldn't defend herself
19 because she didn't have proper records, that the
20 Post Office had taken some potentially useful
21 items and paperwork away during their
22 investigation and she felt she would be
23 prosecuted for theft as well as false accounting
24 if she had not pleaded guilty to false
25 accounting."

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1 Your reply is:

2 "[Post Office Limited] cannot comment on
3 individual cases. We don't know which case this
4 is. Maybe it is someone who said one thing in
5 interview under caution, which entailed
6 admission of offence of dishonesty, but later
7 chooses to misrepresent the facts purposely.
8 Without knowing who it is and what she says we
9 cannot respond further. Maybe it is
10 somebody, who we prosecuted recently, ie file
11 still exists and if the BBC provides the
12 information, we may then be able to verify this
13 or otherwise."

14 Why was your initial reaction, without
15 knowing which case Mr Wallis was referring to,
16 that the subpostmaster may have admitted
17 dishonesty and then later purposely
18 misrepresented the facts?

19 **A.** It wasn't my view. As I said previously,
20 I've -- I have no experience of any of these
21 type of responses to the media. I obviously
22 sought on the whole content of it from
23 an expert -- expert being a senior legal adviser
24 or the criminal barrister -- criminal
25 specialist, and I said "Well, look, this is what
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1 haven't got the time -- and to focus on the
2 particular aspect because, you know, you've got
3 the tray full of other stuff to deal with.
4 That's what I did. So that's what I've done on
5 Sunday because Monday to Friday I haven't had
6 the energy or the time to deal with this. So
7 that's -- where are we, 11.00 on Sunday morning?
8 So this --

9 **Q.** So who was the legal expert that dictated this
10 to you?

11 **A.** I think over the time, I've used various people
12 I've known or made contact through my workings
13 with them. But I think this is probably more
14 likely to be, you know, Cartwright King.

15 **Q.** So what, you get the email from Melanie Corfield
16 saying the BBC is going to go to press, go to
17 broadcast The One Show, can we have some
18 comments please? That's forwarded on to you.
19 You don't reply. You instead go off to
20 Cartwright King and say, "What should I reply?"
21 and Cartwright King dictate an email to you
22 which says this, and then you send it out as if
23 it's your own work?

24 **A.** Well, I think there is a -- part of it would be.
25 I mean, I would, like, any person -- I mean, I'm
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1 I'm faced with. This is the advice I'm seeking.
2 Please advise".

3 And that's -- basically I've used that, that
4 advice, to respond to it. It's not a personal
5 response because I didn't have the expertise to
6 deal with it. So what I'd done, like everything
7 else I do, is to seek expert legal advice to
8 pass on to the business.

9 **Q.** So where it says, "My comments", these aren't
10 your comments?

11 **A.** No. They're not, they --

12 **Q.** It shouldn't say, "My comments". It should
13 say --

14 **A.** It should --

15 **Q.** -- I don't know anything about this"?

16 **A.** Yes, I sought advice, yes, on Nick Wallis' One
17 Show thing. I might even have gone further.
18 Now in hindsight, from experience and knowledge,
19 I might have said "Look, I am not an expert,
20 I will seek advice and will revert back to you"
21 and the next email would have been "This is the
22 advice I've had, this is a copy".

23 That's what I'd have done now, looking in
24 hindsight, but, at that time, the pressure of
25 the time -- times -- time where you are you
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1 not an expert at everything in the law, there
2 are certain aspects I know, personally I can
3 make a contribution towards, but this is advice
4 which I'm seeking because I'm not a specialist
5 in that area and I want the business to have the
6 best advice there is.

7 **Q.** So it wasn't your view that the person that the
8 BBC were referring to, who they had interviewed,
9 was somebody who may have said one thing in
10 interview under caution, in which they admitted
11 dishonesty, but then later chose to misrepresent
12 the facts. That wasn't your view at all?

13 **A.** I don't know. I mean, this is going back years
14 now. I mean, presumably, from past experience,
15 knowledge, maybe, maybe not. But I can't say,
16 yes, or -- I can -- I can't say "yes" or "no" to
17 that, so I don't know.

18 **Q.** So we should be able to find an email exchange,
19 should we, on all of these things where you're
20 going back to Cartwright King and saying, "Look,
21 I've received this. Although I'm a senior
22 criminal lawyer, I'm not expert in the criminal
23 law. Can you help me out as to what I should
24 say?"

25 Then we should be able to find a reply from
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1 Cartwright King saying, "Jarnail, say this"?

2 **A.** I don't know whether it would be email or just
3 me chatting to them and they'd either dictating
4 it and me making notes. I can't -- you know,
5 it's years later -- tell you exactly what
6 happened. But I presumably, if there is
7 an email, you will be able to lay your hands on
8 it because, you know, it's there on the system,
9 wherever you got this from.

10 **Q.** Well, that's the problem: it's not. What we've
11 got is the email sent to you and then your reply
12 saying, "My comments are as follows".

13 **A.** I don't know. I don't know what the answer to
14 that, you know, this years on. You know, my
15 thing is you just -- I can't -- I can't assist
16 you further.

17 **Q.** But you wouldn't associate yourself with this,
18 would you? There's a case of a subpostmaster
19 blaming the Horizon system. Your response
20 wouldn't be "Well, hold on, there might be
21 someone who said things under interview, under
22 caution, in which they admitted dishonesty and
23 they're now misrepresenting the facts"; without
24 knowing about a case you wouldn't say that,
25 would you?

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1 I had to do --

2 **Q.** Even though you're the author of an email which
3 rather discloses that state of mind?

4 **A.** I may be the author of it but I -- as I said to
5 you, no individual person can do this. It's got
6 to be a team effort. It's got to be a unit
7 because, otherwise, it wouldn't work.

8 **Q.** But you put your name to all of these emails?

9 **A.** Because --

10 **Q.** You weren't some naive *ingénue*, were you?

11 **A.** Probably, looking in hindsight, maybe I was, you
12 know, maybe I didn't think it through, probably
13 didn't have the time to think it through.
14 Thinking it through now, I probably wouldn't
15 have.

16 **Q.** Can we turn, please, to POL00060974. If we
17 scroll down, please, if we just look at the
18 whole email first, you can see it's an email
19 from you to Susan Crichton, heading "Second
20 Sight and QC", 28 July 2013. Then scroll on,
21 please, so we can see the whole of the email and
22 then scroll on, and scroll on. You can see
23 you've signed it off, yeah?

(No audible response)

If we just go back to page 1, please, and

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1 **A.** No, no --

2 **Q.** Because that's just wild speculation, isn't it?

3 **A.** That's what it would be but then it wouldn't be
4 speculation in the sense that there may be
5 some -- you know, if you come across a case, you
6 might have formed that view, you kept it, and
7 then subsequently used it. But without any
8 knowledge or personal experience, I wouldn't
9 have just put it down to like that, or maybe the
10 person who is helping and assisting in that case
11 have come across it, and they highlighted it
12 and -- maybe rightly or wrongly, maybe
13 I shouldn't have used it. I don't know.

14 **Q.** Is this emblematic of the Post Office's attitude
15 towards subpostmasters who challenged the Post
16 Office's approach to prosecutions, that we
17 assume that they may themselves have done
18 something wrong; we can't countenance the idea
19 that they might actually be right?

20 **A.** That's not my view. But, certainly, whether the
21 Post Office has the view then I think the
22 witnesses you had in the past and the future,
23 you'll have to ask them. I can't say for the
24 Post Office. I know certainly I would -- it's
25 not my view, I didn't -- you know, I did what

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1 scroll down, please. So the context from the
2 heading "Second Sight and QC" appears to be the
3 review that was being undertaken at this time by
4 Second Sight, and the involvement or possible
5 involvement of a QC, and presumably that would
6 be Brian Altman QC, at that time; is that right?

7 **A.** That's right, yes.

8 **Q.** You say:

9 "I was thinking about what we have been
10 working on. Here are my thoughts."
11 You say:

12 "I was the Prosecution lawyer in the case of
13 *R v Misra* at Guildford Crown Court in 2009-2010.
14 As far as I am aware, this is the only criminal
15 trial where a jury has been required to consider
16 in detail the integrity of the Horizon system.
17 I can say generally about what lessons can be
18 learned from the case, in the hope that this may
19 be of some assistance to the business in
20 response to the Second Sight Interim Report and
21 proposed appointment of a QC.
22 "The lessons to be learned from the *Misra*
23 case."
24 Scroll down, please:
25 "There are a number of lessons that can be

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1 drawn from *Misra*. I'm aware of the independent
2 nature of the inquiry and its expertise. I am
3 seeking to merely set out some lessons and
4 tentative suggestions I have derived from
5 completion of a difficult case."

6 Was this your own work?

7 **A.** No. It's not completely all my work. It's --
8 as I say, I first sought the help and assistance
9 and advice from others who know -- you know, who
10 could assist with the --

11 **Q.** So when you say, "I am aware", "I am seeking",
12 and you're making "tentative suggestions", and
13 "I have derived" ...

14 **A.** Yeah, I mean, looking in hindsight, I mean that
15 probably would have been wise to say "Look" --
16 maybe even name -- say "Look, I've sought advice
17 from A, B, C and D, these are the thoughts of
18 a number of people, and that will help you in
19 appointing, you know, the QC, Brian Altman, or
20 who else because this is the sort of area we're
21 looking at, the complexity of the Horizon system
22 and you need to be aware of that", basically.

23 I mean, I don't think there was anything in
24 it. I mean, that's basically more or less what
25 I done previously. So --

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1 I needed other people's input to complete it and
2 this is just assisting legal counsel in the Post
3 Office to help her to appoint somebody.

4 **Q.** Can we scroll down, please. In the last
5 paragraph on this page, you say:
6 "It is very easy for a dishonest
7 [subpostmaster], as Mrs Misra was proved to be,
8 to make vague accusations against Horizon where
9 other lines of defence are closed. It is not
10 difficult to attract sympathy for such false
11 claims. A [subpostmaster] is likely to be
12 viewed as a hard-working person of good
13 character. Most [subpostmasters] who steal do
14 so because they are in financial difficulties,
15 often stealing simply to prop up their failing
16 shop business. In such circumstances there will
17 be no evidence of luxurious living. A dishonest
18 [subpostmaster] can use these factors to create
19 a false picture that he or she is the honest,
20 hard-working victim of a complicated yet flawed
21 computer system."

22 Where did that description of the dishonest
23 subpostmaster come from?

24 **A.** I don't know. I don't know where that came
25 from, presumably a number of cases the Post

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1 **Q.** You continue:

2 "Horizon is a complex computer system, about
3 which even eminent experts can make mistakes."

4 Can you see we've seen this before, haven't
5 we?

6 **A.** Yes, it's the same.

7 **Q.** This is a rehash --

8 **A.** Yes.

9 **Q.** -- of another email?

10 **A.** Yes.

11 **Q.** "There was no reason to doubt Professor
12 McLachlan's expertise and good faith but time
13 again he had to be corrected by Mr Jenkins."

14 **A.** Yes. The same.

15 **Q.** "... not the only expert to have misunderstood
16 ... I have spoken to colleagues", et cetera.

17 So here you're passing off as your own
18 thoughts a cut and paste on an email, which
19 itself was passing off as your own thoughts
20 something that was, in fact, written by somebody
21 else? Is that where we've got to?

22 **A.** It's -- yes, I suppose you could say that, yes.

23 **Q.** Well, I do say that and I'm asking you, that's
24 where we've got to, Mr Singh?

25 **A.** I think -- I mean, I was involved in it.

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1 Office --

2 **Q.** You're talking about Mrs Misra here, aren't you?

3 **A.** Well, that's the -- well, I -- the fact that
4 Mrs Misra's case has been the one that's been
5 more detailed, then that's the reason why it's
6 been highlighted as the *Misra* case, but it would
7 be -- generally, it wouldn't be just one case,
8 you would assume, it would be a lot -- you know,
9 generally the picture has emerged. It wasn't
10 just my view; it was the view of the people who
11 made a contribution towards this.

12 **Q.** Cartwright King hadn't been involved in the
13 prosecution of Seema Misra, had they?

14 **A.** No, they hadn't. No.

15 **Q.** So was it your view that you're referring to
16 here then?

17 **A.** No, I didn't deal with the whole of the case.
18 As I said to you, that's because it was one of
19 those cases where it was difficult. I was away
20 quite a bit in that year because it was
21 a difficult year for me personally. So you had
22 other people picking up the case on and off, and
23 dealing with it.

24 **Q.** Whose view are you referring to here?

25 **A.** Well, all the people in the -- in our -- in the

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1 Criminal Law Team.

2 **Q.** Is that the collective view of the Criminal Law
3 Team that we see revealed there, then?

4 **A.** No, I don't think so. It just --

5 **Q.** Who within the Criminal Law Team did not hold
6 that view?

7 **A.** I don't think any of us did. It's just a --

8 **Q.** I thought you just said that --

9 **A.** Well, I --

10 **Q.** -- this is the view of the Criminal Law Team?

11 **A.** It's not the view, it's -- when you're writing
12 something, you just -- it's something that came
13 about but I can't give you -- I can't say that
14 that's the view we generally held or -- in
15 hindsight, it was silly, stupid thing to do,
16 I suppose.

17 **Q.** Sorry, in hindsight?

18 **A.** In hindsight, it wouldn't be written like that,
19 would it? I mean, maybe at that time.

20 **Q.** Not with you sitting here having to justify it,
21 if that's what you call hindsight?

22 **A.** No, what I mean is, you know, when you had
23 reviews, and so forth, then obviously you know
24 there's something wrong. But at that time,
25 nobody was aware. Everybody was relying on it,

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1 a case, and that you acted as a point of contact
2 between the Post Office Limited and Cartwright
3 King and would request or forward information as
4 and when required. You made a correction to
5 that part of your statement this morning,
6 I think.

7 In paragraph 7, you give the impression that
8 you were essentially a postbox between the Post
9 Office and Cartwright King; would that be fair?

10 **A.** Um --

11 **Q.** This is post-separation.

12 **A.** I think at the beginning I wanted to do things
13 in a certain way but I think, as soon as Second
14 Sight came on board, it was different because
15 I had other pressures internally. I didn't have
16 the resources. I didn't have the support and
17 I think I mentioned to you early this morning
18 that I highlighted that to Susan and Hugh, and
19 Cartwright King, basically, more or less sat in
20 the seats of the Criminal Law Team, as they were
21 before.

22 And yes, they -- that's right. I mean, as
23 and when they needed me, I was there; as and
24 when I needed them, they were there.

25 **Q.** What level of supervision and oversight did you

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1 I think, so we assumed that everything was fine.
2 So at that particular moment in time, the year
3 2010, it was -- the system was working perfectly
4 as everybody was -- as far as everybody was
5 concerned.

6 **Q.** This is July 2013, when everyone knew that
7 everything wasn't fine?

8 **A.** Well, it's the background. Susan wanted the
9 background or something, I think she mentioned
10 something in a passing "Jarnail, can you help",
11 and that's probably why I mentioned it.

12 **Q.** But you're still running the line, aren't you,
13 that there's a presumption of dishonesty with
14 subpostmasters; they're to blame, not Horizon?

15 **A.** No, that's not the case. I never held that
16 presumption. I never assumed anything. It's
17 just the -- what it was at that particular
18 moment in -- at that particular date or time.

19 **Q.** Can we move on, that can come down, please.

20 You refer in your witness statement to the
21 supervision of prosecutions or investigations
22 and charging decisions, undertaken by Cartwright
23 King. You say in paragraph 7 that, in respect
24 of criminal prosecutions, Cartwright King took
25 over full responsibility for the lifetime of

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1 perform post-separation when Cartwright King
2 took over responsibility in the way that you
3 describe?

4 **A.** How do you mean -- the Criminal Law Team, or --

5 **Q.** Post-separation, you're the only criminal lawyer
6 in Post Office Limited. Cartwright King, you
7 say, take over responsibility and you acted as
8 a point of contact between the Post Office and
9 Cartwright King and I'm asking what level of
10 supervision and oversight of Cartwright King's
11 work did you undertake?

12 **A.** I didn't. I don't -- I think you're right,
13 probably was more of a -- I can't remember, to
14 be honest. It was -- it just -- I don't know,
15 I mean, is the answer to that. I certainly --
16 it was more like I described to you, it's
17 a relationship where they basically knew
18 I worked very well, and I think they came on
19 board on the subpostmasters' cases early 2011.

20 **Q.** That's what I was going to ask you. When did
21 Cartwright King take over full responsibility
22 for the lifetime of a criminal case?

23 **A.** I think more or less March, year 2011, something
24 like that. Because we didn't have the capacity
25 in-house and I think, more or less, some of the

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1 cases where I did one or two initial advices,
 2 that is the year -- March 2011 and I think
 3 I went up to Rob Wilson and said, "Look, how are
 4 we going to manage this?"
 5 And I think he then -- I think, soon after
 6 the decision was made to pass all the
 7 subpostmaster cases to Cartwright King. And
 8 I think they formalised the position even more
 9 after 1 April 2012. But they'd been dealing
 10 with our cases, or the subpostmaster cases --
 11 prosecution of subpostmaster cases the year
 12 before, March '11.

13 **Q.** So between March 2011 and April 2012, who in the
 14 Post Office was responsible for the supervision
 15 of the conduct of prosecutions undertaken by
 16 Cartwright King?
 17 **A.** Presumably the Head of Criminal Law Team.
 18 **Q.** Did any of the criminal lawyers take part in
 19 search supervision of prosecutions conducted by
 20 Cartwright King?
 21 **A.** I don't know to that, I mean, I -- I --
 22 honestly, I don't know. I certainly -- I think
 23 one of the problem was -- the reasons being,
 24 I think the principal lawyer -- I think she had
 25 some medical problem. I think she had to take
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1 as you know, "Jarnail, can you help with it, can
 2 you help with that?" Because there's a lot
 3 going on, you've got a Second Sight law, you've
 4 got the mediation, you've got all sorts of
 5 people reviewing it, shifting through the cases.
 6 The Chief Executive period --

7 **Q.** When you say "shift", do you mean sifting
 8 through the cases?
 9 **A.** Sifting, sorry -- shit, sorry about that. Yes.
 10 So it was very exhausting, it was very
 11 extending but it was enjoyable in the sense of
 12 something new and the beauty -- the good thing
 13 was that I had experts, Cartwright King, the
 14 barristers, in Bell Yard, assisting and helping,
 15 so, from a development point of view, it was
 16 quite good, but from --

17 **Q.** I'm less interested in your professional
 18 development and how fulfilled you felt --
 19 **A.** I'm filling in, purely because, you know, there
 20 were other things to do with in-house but
 21 I can't list all of them because it was Susan,
 22 Hugh, other team members. You've got the civil
 23 litigation lawyers, again, dealing with the
 24 mediation side of it.
 25 **Q.** So would this be right, between March 2011 and
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1 six months or ten months off, and I said "Well,
 2 look, Rob, I can't deal with this. There's just
 3 too much". I don't know what number of cases
 4 were we're involved with now but that's when the
 5 decision is made to -- the subpostmaster cases
 6 just went to Cartwright King, from then on.

7 **Q.** So you can't help us as to who within the Post
 8 Office was responsible for the supervision of
 9 the conduct of prosecutions by Cartwright King
 10 between March 2011 and April 2012?
 11 **A.** It would be Rob Wilson, I would assume.
 12 **Q.** Just Rob Wilson?
 13 **A.** Yeah, I would have thought.
 14 **Q.** Okay.
 15 **A.** It certainly wasn't me because -- it wouldn't
 16 have been on my sort of, you know, grade or
 17 whatever it is they call it, yeah.
 18 **Q.** Okay. If all of the prosecutions were being
 19 undertaken and they undertook full
 20 responsibility for the lifetime of criminal
 21 cases, Cartwright King --
 22 **A.** Yes.
 23 **Q.** -- between March 2011 and April 2012, what were
 24 you doing?
 25 **A.** Well, I -- almost everything in-house. I mean,
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1 April 2012, you were engaged in work that
 2 concerned the fallout from the discovery of some
 3 problems or potential problems with Horizon and
 4 liaison with parts of the business the Second
 5 Sight review, the setting up of the Mediation
 6 Scheme, and other things like that, rather than
 7 the conduct of prosecutions?

8 **A.** I mean, with mediation and the setting up other
 9 aspects, they're just on the periphery of it or
 10 the outside. I wasn't heavily involved in any
 11 of that because I wasn't part of that. But any
 12 criminal aspect, getting data together, I think
 13 they -- the board wanted some sort of sheet as
 14 to, you know, how many cases are being
 15 prosecuted, how many cases are not. The
 16 progress side of things.
 17 And I think -- I don't know what the remit
 18 of Hugh -- I think he used to email me "Jarnail,
 19 can you give me this? What does that mean?",
 20 you know, from a criminal aspect. You know,
 21 generally that.

22 **Q.** After then, after April 2012, post-separation,
 23 where you were the only criminal lawyer within
 24 Post Office Limited --
 25 **A.** Yes, I was the only criminal lawyer there, yes.
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1 Q. -- who was responsible in the Post Office for
 2 supervising the conduct of prosecutions that
 3 were run by Cartwright King?
 4 A. Well, I suppose it would be Hugh. Hugh had
 5 quite an input into it. He always wanted to
 6 know what was going on, and I think --
 7 Q. What was Hugh's job then?
 8 A. He was Head of Legal.
 9 Q. Civil?
 10 A. No, overall.
 11 Q. So you, as the only criminal lawyer didn't, have
 12 any role in the supervision of the conduct of
 13 criminal prosecutions run by Cartwright King?
 14 A. I think they kept me informed as to what was
 15 going on. I did ask a lot of the time, "Look,
 16 Hugh wants to know that", "Susan wants to know
 17 that", "Business wants to know that", and they
 18 were very helpful, and they used to -- and also
 19 I think I had quite a good relationship with
 20 their lawyers, four or five of them, and they
 21 all said, "Jarnail" -- they used to flag things
 22 up for me, so I can, in turn, keep myself up to
 23 date and communicate that to, you know, Hugh and
 24 Susan.
 25 Q. Was there a system for reviewing how Cartwright
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1 out of the loop, were you?
 2 A. Well, I think, as you can probably see from the
 3 emails, that yes, most of the time, I was a bit
 4 sort of -- as and when there was advice to be
 5 sought, or some input, they included me in. But
 6 I think a lot of it is things that have been --
 7 they've been there -- civil litigation has been
 8 part of the Post Office Limited or some of the
 9 people been there longer than have, I don't --
 10 before even their separation, and it was
 11 business as usual.
 12 The criminal lawyer side was something that
 13 was new to them and we had Cartwright King in
 14 place, we had the Bell Yard lawyers --
 15 barristers in place.
 16 Q. What were the Bell Yard barristers doing?
 17 A. Well, they were prosecuting.
 18 Q. Talking in April 2012 onwards?
 19 A. I think there was ongoing cases which they
 20 brought forward which they were already part of,
 21 and I think then, subsequently, Cartwright King
 22 either decided to keep in-house or to use them
 23 as and when there was London cases but I can't
 24 help you with that.
 25 Q. Can you just help us, I'll ask one last time: as
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1 King or indeed any other external solicitors
 2 were conducting their prosecutions?
 3 A. I don't know whether there was official policy
 4 but I wasn't aware of it. But that would have
 5 been -- I wasn't copied into anything like that.
 6 I've not seen any policy as to how they've been
 7 reviewed but I think they were sort of more or
 8 less -- because Second Sight came in on board
 9 more or less June/July '12, I think it was, and
 10 I think, after that, I was -- from a different
 11 position to where I wanted to be.
 12 And I think then that, again, is something
 13 that Hugh and Susan would have monitored or had
 14 something in place to chat to them and work out,
 15 do their appraisal and --
 16 Q. So it's Hugh and Susan's job, not yours?
 17 A. No, no.
 18 Q. Was there any system in place to your knowledge
 19 to ensure that Cartwright King would be aware of
 20 any potential Horizon system issues or user
 21 issues relating to Horizon?
 22 A. I would assume so but I can't say "yes" or "no"
 23 because I wasn't part of it. I wasn't told one
 24 way or the other.
 25 Q. So as the only criminal lawyer, you were kept
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1 the person with the 15-year history of
 2 prosecuting cases, as the person who was the
 3 criminal lawyer, why after April 2012 did you
 4 have such a limited role, even though you were
 5 the only criminal lawyer in the Legal team?
 6 A. Well, yeah, that was what was required, it just
 7 fitted in with whatever the business wanted.
 8 I mean the -- a lot of the -- you know, well all
 9 of the prosecutions dealt with by outside,
 10 that's the -- their model or that's the way they
 11 wanted to go forward, and that's what the other
 12 areas of the law were. Same with the civil
 13 litigation, there was only Rodric, I think,
 14 there and the same as the company commercial,
 15 there was only one lawyer overseeing that, and
 16 that's the model. Maybe they misunderstood how
 17 it was going to work but that's how it worked
 18 and then subsequently other things took over.
 19 Q. Can I turn to prosecution policies and charging
 20 decisions. In your witness statement,
 21 paragraphs 19 and 20, you say, during the period
 22 when the Post Office was still part of the Royal
 23 Mail Group, so this is up to April 2012, files
 24 would be prepared by Investigators and sent to
 25 the Criminal Law Team for advice as to
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1 prosecution and appropriate charges, correct?
 2 **A.** Where are we?
 3 **Q.** 19 and 20.
 4 **A.** Okay. Do you know want to put it on the screen
 5 or can't we put it on the screen, or there's no
 6 need?
 7 **Q.** Yes, we can put it on the screen if you want.
 8 Witness statement page 8., foot of the page. Do
 9 you want to read those to yourself?
 10 **A.** Where are we, number 20 or 19?
 11 **Q.** Both.
 12 **A.** 19, okay.
 13 **Q.** So my summary of that was: in paragraphs 19 and
 14 20 of your witness statement, you describe that,
 15 during the period when the Post Office was still
 16 part of the Royal Mail Group, ie up to April
 17 2012, files would be prepared by Investigators
 18 and sent to the Criminal Law Team for advice as
 19 to prosecution and charges; is that correct?
 20 **A.** Yes.
 21 **Q.** Right. Good. That can come down, then.
 22 In paragraph 3 of your witness statement you
 23 say:
 24 "As a criminal prosecutor, I will always do
 25 my best with the knowledge and evidence that
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1 **A.** Well, the Criminal Law Team, no.
 2 **Q.** You were not involved in any of the development
 3 of those policies nor contributing to them?
 4 **A.** Not that I'm aware of, no.
 5 **Q.** You tell us in paragraph 15 that, although
 6 you're described as the owner of a policy, that
 7 simply means that you adopted the policy on
 8 behalf of the Post Office --
 9 **A.** Yes.
 10 **Q.** -- on its separation from Royal Mail Group; is
 11 that right?
 12 **A.** That's right, yes.
 13 **Q.** So, if we saw policies with you listed as the
 14 owner, that does not mean that you contributed
 15 to the content nor approved of the content; is
 16 that right?
 17 **A.** Apart from 1 April, year 2012, I would have --
 18 no, I'd be very surprised if there is one.
 19 **Q.** You tell us in paragraph 16 that the aim and
 20 rationale behind subpostmaster prosecutions was
 21 both to hold the offender to account and to
 22 deter potential offenders, yes?
 23 **A.** Yes.
 24 **Q.** How was compliance with the policies monitored?
 25 **A.** How do you mean? Can you sort of elaborate
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1 I have in front of me, and at the time of each
 2 subpostmaster case I followed the relevant
 3 codes, policies and procedures and genuinely
 4 thought I was doing the right thing."
 5 Is that right?
 6 **A.** Yes, yes.
 7 **Q.** In paragraphs 12 to 15 of your witness
 8 statement, you refer to policies governing
 9 prosecution and charging decisions and the
 10 conduct of prosecutions, and you tell us that
 11 you were not involved in contributing to or
 12 developing any of the policies that you list
 13 correct?
 14 **A.** That's CLT, isn't it? Are we looking at
 15 Criminal Law Team now?
 16 **Q.** Yes, we've always been looking at the Criminal
 17 Law Team in this set of questions.
 18 **A.** Yes, yes.
 19 **Q.** I'm talking about before April 2012?
 20 **A.** Yes. Yes.
 21 **Q.** So you were not involved in the development of
 22 any of the policies that you list in
 23 paragraph 14 --
 24 **A.** No, not --
 25 **Q.** -- sorry, in paragraph 12.
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1 a little bit so I can help you?
 2 **Q.** There are a series of policies --
 3 **A.** Yes.
 4 **Q.** -- that say when you're conducting
 5 investigations and prosecutions you should do
 6 these things?
 7 **A.** Yes.
 8 **Q.** How was compliance with those things assessed or
 9 monitored?
 10 **A.** When I advised -- I think it was all to do with
 11 the prosecutor's code, basically. I've
 12 obviously read them, when I joined the Criminal
 13 Law Team and subsequently, but, as far as the
 14 monitoring side of it is concerned, that wasn't
 15 part of my remit. I didn't get involved in it.
 16 Certainly, I made the results known of every of
 17 my cases as to how they were put together. Who
 18 put them together, it wasn't part of my
 19 employment or part of my role.
 20 **Q.** What about you not as the monitor but as
 21 somebody who was monitored?
 22 **A.** If I was -- it would be appraisals. I think we
 23 had appraisals every three months or every two
 24 months and I think, certainly, the -- when I was
 25 away, people might have looked at my files, the
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1 advices I gave, and I think some people who went
2 to court on a certain case said it was on their
3 case and my case was, you know, for a hearing on
4 the same day or same time, they would review it.
5 That type of thing is the only monitoring I can
6 think of. I can't think of any --

7 **Q.** By that, do you mean monitoring your advocacy?

8 **A.** No, they would physically have my file in front
9 of them and, certainly -- Rob certainly looked
10 at it because, I think, appraisal times, or
11 subsequently, as and when he looked at it, he
12 would advise on it, "You should have done this,
13 you should have done that, be careful on that",
14 you know, and I think once or twice he might
15 have even said, "Look, this is the way you
16 should have done it, why didn't you consider
17 that?"

18 So that was the sort of way it was
19 monitored. There was no set, you know,
20 procedure or --

21 **Q.** So it was chats, essentially?

22 **A.** I don't know. I don't know what he did with it.
23 I don't know whether he in subsequently reported
24 further down to his line managers, I don't know.
25 But certainly --

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1 by defence lawyers?

2 **A.** No, that's one of the things I mentioned and
3 several others. You know, you learn from it
4 don't you, as and when somebody is, you know,
5 reacting to it? But, certainly, it would be
6 appraisals. I think every three months, every
7 six months, I don't know now and, certainly, you
8 know, we had conferences with the barristers,
9 and they did the advocacy, they would do the
10 opinions.

11 But I don't know what my line manager did or
12 what he did with the others, or whatever, but
13 certainly it would have been the line managers
14 who would deal with it, or the team leaders --
15 the Head of Criminal Law.

16 **Q.** What about from April 2012 onwards, when you
17 were the sole criminal lawyer within Post Office
18 Limited? Did you take on responsibility for the
19 ongoing review of all Post Office policies
20 relating to prosecutions and criminal law?

21 **A.** That -- I think that was Hugh or Susan, I think
22 they were more hands on that.

23 **Q.** Hugh and Susan again?

24 **A.** Susan Crichton and Hugh. They, in turn, dealt
25 with all that. I didn't get involved in that.

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1 **Q.** I'm talking about between August 1995 and April
2 2012. So there's a 17-year period as --

3 **A.** Yeah, there's --

4 **Q.** I'm asking you as a lawyer how you felt, that
5 your adherence to policy was monitored and
6 assessed?

7 **A.** Well, certainly when the matter is before the
8 courts, then you -- we briefed counsel because
9 they had the right of audience, we didn't. They
10 certainly came back, you know, with their own
11 advice and opinions and then you had a lot of
12 the time, maybe a lot even of the defence
13 lawyers come up with all sorts of -- I don't
14 know, in their defence statements --

15 **Q.** Are you saying that your performance was
16 monitored by defence lawyers?

17 **A.** Well, not monitored but then you could see, from
18 the way they're responding to it, you're
19 engaging with them in that way. But, certainly,
20 internally, it would be appraisals by the Head
21 of Criminal Law Team.

22 **Q.** Can I just get this right, Mr Singh. In answer
23 to my question how, over a 17-year period as
24 a prosecution lawyer, was your compliance with
25 Post Office policy monitored, you've answered:

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1 **Q.** Why not as the criminal lawyer?

2 **A.** I don't know. I can't honestly answer that.
3 I can tell you that I wasn't involved in it.

4 **Q.** Was it because people didn't view you as having
5 expertise?

6 **A.** I can't tell what the other people thought.

7 **Q.** Surely, as the only criminal lawyer in the
8 business, there's a suite of criminal law
9 policies here, wouldn't you put your hand up and
10 say, "Hold on, that's my job"?

11 **A.** I didn't. Well, maybe I should have done, in
12 hindsight.

13 **Q.** You're not involved in any prosecutions, you've
14 told us; that's Cartwright King.

15 **A.** Yeah.

16 **Q.** You're not involved in supervision of any
17 prosecutions; that's Susan and Hugh.

18 **A.** Mm.

19 **Q.** You're not involved in maintenance or review of
20 the policies; that's Susan and Hugh. What were
21 you doing?

22 **A.** Well, as you say, the -- what I did do was the
23 obviously picked up on various aspects of it,
24 the training of the Investigation Officer, which
25 I did with the Cartwright King. I was involved

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1 in getting Simon Clarke to look at the
2 prosecution policy. I was also involved in
3 getting advices on Auditors being -- you know,
4 how the Auditors ought to function, how they
5 ought to deal with their role, within the
6 criminal law.

7 There was so much there, you would not
8 believe. I didn't have -- I mean, ideally,
9 I would have -- that's what I would have done.
10 I would have basically taken over and made it my
11 own, but it didn't sort of quite work out that
12 way.

13 **Q.** Can we look, please, at POL00122123, please. If
14 we scroll down, please. Sorry, keep scrolling,
15 thank you.

16 An email of yours of 31 January 2013. So
17 the period that I'm referring to, ie post-April
18 2012. You say:

19 "Hugh, Susan, John and Alwen

20 "Please find copies of the following papers
21 for the above meeting.

22 "Current POL prosecution policy.

23 "Proposed ... enforcement", et cetera,
24 et cetera.

25 So a series of criminal prosecution and
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1 or Hugh wanted it -- wanted them to be copied in
2 to it, so all I did was collected all of them
3 and sent it on to the relevant people to get --
4 have a meeting on 4 February and then,
5 subsequently, you know, go through it and agree
6 it, or not --

7 **Q.** You were just a postbox, really?

8 **A.** Yeah, yeah.

9 **Q.** A collector together of pieces of paper and
10 a postbox?

11 **A.** Yeah, I mean postbox in that respect but there
12 was other aspects I was involved in, as well,
13 but yeah, I suppose in -- in -- realistically,
14 maybe you're right. I agree.

15 **Q.** Just a postbox?

16 **A.** Well, I wouldn't say "just a postbox" but if
17 that's -- you say that, maybe yes.

18 **Q.** Can we look, please, at POL00125197. If we can
19 go to the last email in the chain, please. If
20 we scroll up from there, email from Bond
21 Dickinson, and if we scroll up, from Gavin
22 Matthews at Bond Dickinson, to Chris Aujard and
23 you in May '14:

24 "... I understand from Brian that he is
25 close to having a first draft of the POL
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1 investigation and enforcement policies, agreed?

2 **A.** Yes, yes.

3 **Q.** This is seemingly for a prosecutions policy
4 meeting on 4 February, looking at the title; can
5 you see that?

6 **A.** Yes.

7 **Q.** If you had no involvement, as you've told us, in
8 investigation and prosecution policy formation
9 or development, why were you sending on
10 prosecution and investigation policies and
11 enforcement policies for a meeting that you were
12 going to attend?

13 **A.** Well, I -- that -- I've collected everything
14 together, sent it on to them, to -- we will
15 discuss it. I think they wanted that to be --
16 because -- on separation, they wanted the board
17 to approve it. I mean, there was some sort of
18 process or procedure they were going through and
19 they asked me for those, so the -- as I said to
20 you, the Post Office Prosecution Policy was more
21 or less adopted from the Royal Mail and the same
22 as the other aspect of it, the Internal Protocol
23 for Criminal Investigative Enforcement. That
24 was adopted by the Investigation Team and all
25 the people who had interested party in it, Susan
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1 prosecution policy document.

2 "He does have some questions."

3 Then just looking at an example:

4 "What were the hierarchy of POL prosecution
5 decision making be in the future? Ie who will
6 be making the final decision on authorising
7 prosecution -- Jarnail or Chris (as General
8 Counsel) or will the role be split ..."

9 Then the answer comes back:

10 "Jarnail will be the decision maker for Post
11 Office Limited prosecutions. We recommend the
12 procedure be put in place to enable the
13 Investigation Officer to appeal to Chris (as
14 General Counsel) in the event that he/she
15 disagrees with Jarnail's decision."

16 Then if we scroll up, please. Your reply:

17 "Please see in blue below Chris and my reply
18 to [Brian Altman QC's] two questions on the POL
19 prosecution policy."

20 That does show you, does it not, Mr Singh,
21 involved in the formation of policies in at
22 least 2014?

23 **A.** No, what happened there was, I think, Brian
24 Altman was advising on it, on instructions or
25 brief from Gavin Matthews and I think he
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1 formulated some draft. I think he sent it to me
 2 to have a word with Chris, who was the interim
 3 General Counsel for the Post Office and I think
 4 I sent it to him. He wanted some sort of input
 5 from me and I advised, and that never came into
 6 fruition. It never came into being at all. For
 7 some reason or another, I don't know where it
 8 landed, but, when I left, I have never made any
 9 decision on any prosecutions.

10 **Q.** I'm not asking about the substance at the moment
 11 whether you, in the event, became the decision
 12 maker --

13 **A.** No.

14 **Q.** -- on prosecutions?

15 **A.** No, no.

16 **Q.** I'm just asking you the question, in the light
 17 of the evidence you have had given in your
 18 witness statements and today orally, that you
 19 had no role in the formulation or the
 20 development of policy, why we see in this email
 21 Brian Altman QC asking a question and you
 22 replying "Please see Chris and my reply", which
 23 tends to suggest you had some role in the
 24 development of prosecution policy, doesn't it?

25 **A.** No, no. That -- Brian Altman was asked to draft

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1 **Q.** Was it not your reply then?

2 **A.** Well, it's -- I'm working for an organisation,
 3 it's a joint sort of -- I mean, he's the General
 4 Counsel, he asked me to come and explain certain
 5 aspects of it, and I did. And I -- and then he
 6 said "Well, Jarnail, I agree, I disagree.
 7 Jarnail, I don't understand point -- one or two
 8 of these questions, or can you pose those two
 9 questions for Brian to clarify?" That's my
 10 involvement in it.

11 It wasn't something that I put forward or
 12 didn't put forward. I mean, it was not -- you
 13 know, nothing sinister in that, maybe -- that's
 14 it, as far as I can help you with. I can't help
 15 you any more than that.

16 **Q.** Well, you've been very helpful. Can we move on
 17 please to POL00104747. This is a Casework
 18 Management Policy and, if we look at the foot of
 19 the page, please -- sorry, that's it. That's
 20 unfortunate, it doesn't include the date. If we
 21 can just go to the end of the document, please,
 22 and scroll up. Thank you.

23 You can see that this is effective from
 24 March 2000, with a review date of January 2001,
 25 okay?

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1 it by Bond Dickinson, and they -- I don't know,
 2 I wasn't part of that briefing. It was sent to
 3 me as the only criminal lawyer. I passed it to
 4 Chris. Chris wanted to discuss it or go through
 5 it and various aspects of it.

6 I, in turn, advised him I think or we
 7 discussed it, and there was couple of
 8 points/questions he wanted to clarify or put
 9 forward to Brian. I passed it on to Gavin
 10 Matthews of Bond Dickinson and he passed it
 11 back. And I think then Brian came to have
 12 a meeting, and I think that's where it was left.
 13 Nothing went forwards or backwards --

14 **Q.** Mr Singh, this does not say, "Please see below
 15 Chris's reply to Brian Altman's questions". It
 16 says, "Please see below Chris and my reply";
 17 it's your reply, isn't it?

18 **A.** Well, it's my email, I suppose, but --

19 **Q.** No, it's not just your email because I wouldn't
 20 be asking you questions if this email just said,
 21 "Please see below Chris' reply".

22 **A.** Well, obviously --

23 **Q.** I'm asking you the questions because it says,
 24 "Chris and my reply".

25 **A.** Well, because we discussed it. I mean, I --

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1 **A.** Okay.

2 **Q.** If we go back to page 1, please. We can see the
 3 aim of the policy, its "Purpose" is described to
 4 be:

5 "... to ensure that adequate controls are in
 6 place to maintain standards throughout
 7 investigation processes."

8 Would this have been a document with which
 9 you were familiar back in March 2000 onwards?

10 **A.** It's just too long ago. I mean, I -- I probably
 11 read it at some stage but I can't tell you one
 12 way or the other where it landed or what we did
 13 or didn't do with it.

14 **Q.** Can we go forward to page 4, please. Scroll
 15 down, please. I'm so sorry, if we scroll up,
 16 please. I'm looking for paragraph 3.2, please.
 17 Thank you.

18 "Prosecution Casework", this would have been
 19 a policy, whether you remember it now or not,
 20 that applied to you as a prosecutor from March
 21 2000 onwards, agreed?

22 **A.** I don't know whether this is a prosecution
 23 policy because I think all I relied on, most of
 24 the time, was the prosecutors code.

25 **Q.** By that, do you mean the Code for Crown

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1 Prosecutors?
 2 **A.** Yes.
 3 **Q.** The CPS document?
 4 **A.** Yes.
 5 **Q.** What about any internal Post Office policies?
 6 **A.** Well, I think in prominence was the -- you know,
 7 was the prosecutors code. I don't know the
 8 other side of it, to be honest. I mean it's
 9 such a long time ago as to I padded out or I had
 10 any influence or input into it but that was the
 11 one we concentrated on.
 12 **Q.** Sorry, you're dropping your voice there,
 13 I couldn't hear you?
 14 **A.** It had dried up.
 15 **Q.** If you just take a drink, thank you.
 16 So this isn't something that you now
 17 remember as something you worked to when you
 18 were conducting prosecutions from March 2000
 19 onwards?
 20 **A.** I don't remember it now, just --
 21 **Q.** Let's have a look at it anyway to see whether
 22 any of it jogs your memory. It says:
 23 "Details of evidential requirements and
 24 casework preparation and submission timescales
 25 are set out in the Prosecution Guidelines,

1 got to see at the point on deciding evidential
 2 sufficiency and public interest. I am asking
 3 you: is that a list of the things that a lawyer
 4 would see when they made an evidential
 5 sufficiency decision and a public interest
 6 decision?
 7 **A.** I would have thought that would be the basic,
 8 maybe later more would be added on to it.
 9 I don't know but, certainly, that seems, you
 10 know, more or less what every investigation file
 11 would have or should have.
 12 **Q.** So it included at least this, but maybe more?
 13 **A.** I would have thought -- assumed so, yes. I mean
 14 to be honest, I've been out of practice on the
 15 Post Office side of it for such a long time,
 16 I -- and especially the date of the document,
 17 I don't know whether they modified it, there's
 18 more to it. I don't know.
 19 **Q.** When you got files, importantly, did they
 20 include Schedules of Unused Material?
 21 **A.** Yes. I would have -- yes, they should do.
 22 I would hope so, yes.
 23 **Q.** Hope is --
 24 **A.** Well, there should be.
 25 **Q.** -- is a great thing. I'm asking you whether

1 issued to all Investigators.
 2 "To maintain standards and ensure
 3 consistency, official form should always be used
 4 in preference to locally produced forms ..."
 5 Then scroll down, looking at the fourth
 6 bullet point:
 7 "Enclosure envelope should be used to
 8 enclose the following supporting documents:
 9 "Appendix A ...
 10 "Appendices B, C ..."
 11 You can say the list of documents that
 12 should be enclosed, I think, when a file was
 13 sent to Legal Services. Does that list of
 14 documents remind you of the type of documents
 15 that you got when a file was sent to Legal
 16 Services?
 17 **A.** At that time, maybe there's more or less, but
 18 I -- that seemed the standard, isn't it?
 19 Everything is there, the search, the friend
 20 form, disclosure forms, confidential report,
 21 copy of a tape-recorded interview, that type of
 22 thing, yes?
 23 **Q.** The reason for asking, can I make it plain,
 24 Mr Singh, is the Inquiry is interested in the
 25 nature and extent of the material that a lawyer

1 they did?
 2 **A.** Yeah, well, I -- yes.
 3 **Q.** So you would be able, when you're advising on
 4 evidential sufficiency and public interest, to
 5 see what unused material there was, at least by
 6 list?
 7 **A.** There should -- I think -- if you look at the --
 8 yeah, I -- I didn't do the training but
 9 I thought must -- it's a must, isn't it? Yes.
 10 **Q.** But never mind whether you did the training.
 11 You were receiving these things for 17 years?
 12 **A.** I -- yes, I -- I suppose, yes, but I don't
 13 recall it now, as to each and every single file
 14 had it. I don't know to that. But that looks
 15 like it should be in the file, yes.
 16 **Q.** Which documents did you have regard to when
 17 making a decision on evidential sufficiency?
 18 **A.** Well, I -- all of them. Well, I mean,
 19 disclosure forms, confidential report,
 20 interview, tape recorded interview,
 21 investigators report. I mean they're all
 22 relevant, aren't they? The search records,
 23 friend forms, they should all be there,
 24 shouldn't they, because, if they're not, then
 25 how can you advise without them?

1 Q. So you wouldn't just read the investigation
2 reports, you would read the underlying material;
3 is that right?

4 A. I think so. Well, yes. Yeah.

5 Q. Never mind the documents that you should
6 receive, thinking about the approach that you
7 should take or the test that you applied, you've
8 told us, I think, that you had regard to the
9 Code for Crown Prosecutors?

10 A. Yes.

11 Q. Was there any Post Office Limited document that
12 helped you on how to apply that test in the
13 context of a private prosecution?

14 A. I don't know. I don't know, unless it was
15 the -- with the Inquiry papers, I can't --
16 I don't know.

17 Q. Because the Code for Crown Prosecutors is
18 written for Crown Prosecutors and it's written
19 at a level and aimed at an audience that is
20 broad and diverse, because it involves
21 shoplifting in Newcastle and murder in Bodmin.

22 A. Yes.

23 Q. Was there anything that applied that to private
24 prosecutors in the context of the Post Office,
25 carrying it into effect, in your business?

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1 Q. Sorry, just taking them in turn. There was the
2 figure of some 5,000 somewhere?

3 A. I think it was 5,000. I think -- from the back
4 of my mind, if there's less than 5,000 or around
5 about 5,000, was the figure, it's not in the
6 public interest of the Post Office --

7 Q. When did that criterion apply?

8 A. I think -- I can't say whether it's always been
9 there but I can't tell you the precise date.
10 Certainly, the health --

11 Q. Hold on, so, on that one, the alleged loss was
12 £5,000 or less?

13 A. I think the -- yeah, it's about that -- I think
14 it was about 5,000, around about that time.
15 I can't tell you as and when but that figure,
16 for some reason, comes to mind.

17 Q. Okay, and so health: that's the health of the
18 defendant?

19 A. The health of the defendant, his family, the
20 circumstances, the period of offending, was it
21 a one-off offence? Whether they -- I think part
22 of it was the -- whether they repaid the money
23 back and, also, I think the cost of prosecution
24 in light of the overall -- you know, the overall
25 case.

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1 A. Well, that's the way I was trained, that's the
2 way the other lawyers I worked with, and we
3 adopted the same. I mean, the evidential test,
4 the public interest test and the disclosure.

5 And an alternative way of dealing with it,
6 in view of the, you know, the public interest
7 test. That's what we applied. I don't know
8 what more you are asking me about. I don't know
9 any more than that.

10 Q. Can you recall any case in which you concluded
11 that there was sufficient evidence to prosecute,
12 to provide a realistic prospect of conviction,
13 ie meeting limb 1 of the full code test but,
14 nonetheless, you decided that prosecution wasn't
15 in the public interest under the second limb?

16 A. I think so. I think a few, I think, in -- well,
17 quite -- probably a few. I mean, I -- I can't
18 give you the names, but I think I --

19 Q. Can you remember -- sorry, this document can
20 come down so the Chairman can see you.

21 What was the context, even if you can't
22 remember the names, full code limb 1 met, but
23 it's not in the public interest to prosecute?

24 A. Well, there was the -- I think there's a figure
25 of 5,000 somewhere, health --

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1 Q. Thank you.

2 A. There's about five or six of them, I think --

3 Q. In your time --

4 A. Yeah.

5 Q. -- in the 17 years before separation?

6 A. Yeah, I think what I did have a template, I had
7 a habit of actually, on the side of it, the
8 public interest test about six or seven
9 different bits I used to look at, and sometimes
10 even go round chatting to people and saying,
11 "Look, this is what I've got, it's sort of
12 marginal, what do you think? What else should
13 I need to do to, you know, either prosecute or
14 not?" That sort of thing, yeah.

15 There was various aspects. I mean, I'm sure
16 there was number of cases -- but, certainly,
17 there has been where we'd not prosecuted because
18 of the public interest test.

19 MR BEER: Thank you.

20 Sir, I don't know whether that is
21 a convenient moment for you. It is in terms of
22 the topics I'm addressing. Might we break for
23 15 minutes until 3.35?

24 SIR WYN WILLIAMS: Yes, fine.

25 MR BEER: Thank you very much, sir.

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1 (3.20pm)

2 (A short break)

3 (3.35 pm)

4 MR BEER: Sir, good afternoon, can you see and hear
5 me?

6 SIR WYN WILLIAMS: Yes, thank you.

7 MR BEER: Thank you.

8 Mr Singh, if, as a Criminal Law Team lawyer
9 reviewing a file, you took the view that the
10 Full Code Test was not met, would you,
11 nonetheless, refer the case to a nominated
12 decision maker within the business for
13 a charging decision or would your advice that
14 the Full Code Test was not met have been
15 decisive without the need for the case to then
16 be referred to a decision maker within the
17 business?

18 A. No, it'd be closed. I wouldn't take it further.
19 It's closed, there's no evidence. Why would it
20 go to a decision maker? There's no decision to
21 be made, is there? Well, that's my view. I
22 mean, I would say no.

23 Q. So, in that case, the lawyer was the decision
24 maker?

25 A. Well, the decision in the sense there is no
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1 A. Again, the test has not been met, so there would
2 be -- well, I don't know physically where it
3 lands but, certainly, as far as the prosecution
4 team is or Criminal Law Team is concerned, it
5 finishes where, I would have thought, yes.

6 Q. In your statement, you tell us that cases were
7 kept continuously under review in accordance
8 with the Code for Crown Prosecutors, by the
9 lawyer with the conduct of the case and by
10 counsel instructed in the case; is that right?

11 A. Yes, where are we, have we got --

12 Q. I'm not taking you back every time.

13 A. Oh, sorry, yes.

14 Q. If you can just trust me, for the moment, to
15 summarise what you're saying. It's paragraph 21
16 of your witness statement.

17 A. Sure, sure.

18 Q. Does that mean that, even after a decision was
19 made to charge someone with an offence, the case
20 was kept under review to ensure that the Full
21 Code Test remained met?

22 A. Yes, continuous. It's an obligation, I think,
23 and a duty, yes.

24 Q. Would such continued duty be discharged into
25 both the evidential sufficiency part of the Full
187

1 evidence.

2 Q. Or no sufficient evidence?

3 A. Yeah, there's no sufficient evidence, there's no
4 realistic prospect of conviction, so what
5 decision is there made? There is no decisions
6 to be made is there?

7 Q. So an individual within the business,
8 a non-lawyer, could not form the view that there
9 was sufficient evidence, if the Criminal Law
10 Team member had advised that there was not?

11 A. Well, I -- I would have assumed -- well, I --
12 well, I -- yeah, that would have been my view.
13 I would have just probably taken it to the Head
14 of Criminal Law Team and say, "Look, this is
15 where it is, we're closing the file, what do you
16 want to do with it?" But I don't know how it
17 padded out but, certainly, there's no evidence,
18 there's no case, is there?

19 Q. If you, as the Criminal Law Team lawyer
20 reviewing the file, decided that it was not in
21 the public interest for there to be
22 a prosecution, would your advice be
23 determinative or would the case then need to be
24 referred to a nominated decision maker within
25 the business to actually decide the issue?
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1 Code Test and the public interest element of the
2 Full Code Test?

3 A. Those two elements have got to be in existence,
4 hasn't it, for there to be a prosecution case?

5 Q. Was that formalised in any way, ie periodic
6 review?

7 A. I don't know. I mean, I can't say one way or
8 the other. I don't know whether there was --
9 I would have thought the only person, certainly
10 within the Criminal Law Team, would be the Head
11 of Criminal Law. I don't know whether -- what
12 sort of -- what he did with it or whether he had
13 a file or paper trail or something, but
14 certainly he did review the cases, I know for
15 sure, because he did amend one or two of my
16 advices and, also, it would be taken up at the
17 appraisals.

18 Q. I'm talking about you as the criminal lawyer
19 with conduct of the prosecution. Did you
20 periodically review whether both elements of the
21 code test were met, ie a set period of time,
22 we're three months in, we're six months in,
23 we're nine months into the investigation or the
24 prosecution, let's conduct a review; let's have
25 a stocktake, let's stand back and see where we
188

1 are. It sounds not ...

2 **A.** No, it's -- it's the way we were structured.
3 Certainly, when the case was continuous, I --
4 there was letters -- there was physical letters
5 coming in at that time, Rob will look at it,
6 he'll pass it to me. If it was already in the
7 Crown Court, the file would be with the legal
8 executives and I would pick it up and there was
9 times when I would go through it really
10 thoroughly.

11 There was a period -- I can't say every
12 three months, every six months, I don't know --
13 but there was a period when I would look at
14 every single file, you know, as to -- I can't
15 say, you know, every three months, every March,
16 every June or every September, I can't say for
17 sure -- but there was a period when I would look
18 through quite a few of the prosecution files.

19 **Q.** Was there any record kept of that, ie the
20 continuous review at periodic stages in the life
21 of a prosecution?

22 **A.** I didn't keep any records. I -- to be honest,
23 I didn't. As to whether Rob did, as Head of
24 Criminal Law Team, I don't know.

25 **Q.** I think it's right you conducted some of the
189

1 **Q.** To what extent were local agents or the
2 barristers from Bell Yard told that they should
3 conduct a review of the continuing merits in
4 evidential terms of a prosecution?

5 **A.** I think when they were briefed. Once the matter
6 was committed for -- committed to the Crown
7 Court for trial or plea -- you know, when the
8 pleas have been entered, we had a committal
9 bundle, where we sent everything to them and
10 they were asked to advise on evidence and settle
11 the indictment.

12 Then I think, you know, at that stage, they
13 would -- I would assume they would read all the
14 papers and they would advise whether those two
15 tests are met or not.

16 **Q.** Did you understand the advice on evidence to be:
17 (a) an Advice on evidential sufficiency,
18 pursuant to the Full Code Test of sustaining
19 an allegation or allegations under the criminal
20 law; or (b) an Advice on what evidence should be
21 obtained?

22 **A.** I think they would have contained both. I mean
23 sometimes -- well, it would be evidential,
24 importantly only and, secondly, they would
25 advise whether further evidence is required.
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1 advocacy, is that right, in the Magistrates
2 Court?

3 **A.** In the Magistrates Court, yes.

4 **Q.** Was that just for your own cases or did you
5 conduct the advocacy on the behalf of the Post
6 Office for other case holders?

7 **A.** I think at the beginning, when I first started,
8 the first two years, or maybe longer, I did
9 advocacy and the KCs, and the conferences, Crown
10 Court cases for the free case holders, and also
11 mine, and depending on if there was my case
12 listed or somebody else's case listed at the
13 same time, and it would be one of the guys -- me
14 or somebody else would deal with somebody else's
15 case as well.

16 **Q.** So when did you stop doing advocacy?

17 **A.** I think towards the end because we didn't have
18 the bodies. We didn't have the lawyers to do
19 it.

20 **Q.** So towards the end, you mean by reference to
21 April 2012; how close to that?

22 **A.** I don't know, probably when I think -- Debbie
23 Stapel started working from home, then we had
24 our local agents or the barrister from Bell Yard
25 would do the advocacy. They would deal with it.
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1 **Q.** So when you were sending instructions to counsel
2 to advise on evidence, you expected them to
3 advise on evidential sufficiency in maintaining
4 the proposed allegations?

5 **A.** I -- yes.

6 **Q.** Did you expect them to advise in writing?

7 **A.** I think most of the time they would do, but
8 there was the odd occasion where they'd just
9 phone up because they're dealing with the case
10 or long trial, two or three -- but most of the
11 time it would be an email or, I think when they
12 settled the indictment, assume they'd read the
13 papers, and they thought there was sufficient
14 evidence for the case to be, you know, put
15 forward to the -- in the Crown Court, to
16 progress in the Crown Court.

17 **Q.** That was my second question.

18 **A.** Sorry, yes.

19 **Q.** We're going to come on to what settling the
20 indictment meant to you. Can we just stick with
21 what the advice on evidence meant to you?

22 **A.** Yes, yes.

23 **Q.** You took your instructions to counsel to settle
24 an advice on evidence to be, "Please advise us
25 whether the evidence meets the Full Code
192

1 Test" --
 2 A. Yes.
 3 Q. -- "in respect of the proposed allegations"?
 4 A. Yeah, I would enclose the draft indictment or
 5 the copy summons, yeah.
 6 Q. Did you receive back advices on evidence saying,
 7 "Charge 1, I've read the witness statement of
 8 Mr A, the witness statement of Mrs B, and it
 9 seems to me that, if you take those two
 10 together, plus some exhibits, there's a case
 11 disclosed that meets the Full Code Test"?
 12 A. Sorry, say that again, sorry?
 13 Q. Did you actually receive advices back from
 14 barristers which said, "I've looked at the
 15 papers, I've read them, and this is the evidence
 16 that discloses that the Full Code Test is met"?
 17 A. We had opinions, we had advice. I mean, I can't
 18 tell you exactly what that -- you know, that's
 19 what it said. Sometimes, you just had the
 20 indictment back. But there was occasions where
 21 they advised that, you know, further evidence is
 22 required for this --
 23 Q. That's a slightly different issue, that further
 24 evidence is required. I'm asking you what
 25 advice you got back from barristers that said,

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1 Q. So you would infer from the act of sending back
 2 an indictment --
 3 A. Yes.
 4 Q. -- that counsel believed that there was
 5 a realistic prospect of maintaining each of the
 6 counts in the indictment?
 7 A. Yes, because you -- yes. That's -- yes, and the
 8 other thing is sometimes I would -- well, most
 9 of the time I would draft the indictment for
 10 them and say "Counsel, here's a draft
 11 indictment", and they would say "Jarnail, your
 12 draft is fine, lodge it". So there would be
 13 just one line in an email or they would even
 14 attach a copy or put a copy in the post
 15 depending on, you know, what period we're
 16 talking about.
 17 Q. When you were providing legal advice on
 18 prosecution decisions and evidential
 19 sufficiency, when you were assessing whether to
 20 recommend a prosecution or not, did you give any
 21 consideration to the accuracy of Horizon data?
 22 A. I think the way it was worked out was that we
 23 had a witness statement or I always asked for
 24 a witness statement to say that the Horizon
 25 system had been properly installed, it was

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1 "I've looked at the papers, I've analysed them.
 2 In my view, there is a realistic prospect of
 3 a conviction", or "In my view there is
 4 a realistic prospect of a conviction because",
 5 A, B and C?
 6 A. I can't recall, to be honest, if it was like
 7 that. But certainly -- yes, I can't recall.
 8 But there probably was occasion, such -- you
 9 know, it's a while ago.
 10 Q. What about settling the indictment. You send
 11 instructions to a barrister to settle the
 12 indictment. You get back by email a hard copy,
 13 an indictment, did you infer or take from the
 14 sending back of an indictment anything as to
 15 evidential sufficiency?
 16 A. Two ways they could have done, they done the
 17 opinion plus they settled the indictment, saying
 18 "We agree with it but you need to do A, B, C or
 19 D", or they say, "We're happy with the
 20 paperwork, lodge the indictment, here is
 21 a copy". So I'd assume from that that
 22 everything was in order. We got the -- we
 23 complied with the witness statements and
 24 whatever the barristers were, they were happy
 25 with it. Yeah, yeah. I think that, you know --

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1 working in order, how did it operate? That was
 2 the initial and then, I think subsequently, if
 3 there was, in the interview, they mentioned the
 4 fact that, you know, the -- there was a -- in
 5 the interview, the subpostmaster mentioned the
 6 fact that, you know -- pointed to say the -- you
 7 know, "It was the Horizon, it wasn't me", then
 8 certainly I would ask the Investigation Officers
 9 to, you know, actually find out what the problem
 10 is.
 11 Q. So in the first of those instances where
 12 somebody had not raised an issue in interview,
 13 or otherwise in a defence case statement or the
 14 like, you nonetheless believed it was important
 15 or necessary to be able to prove that the data
 16 produced by Horizon was accurate and reliable?
 17 A. Yes, absolutely, yes.
 18 Q. Why was that?
 19 A. Because it's -- it's -- it's a machine, isn't
 20 it? It's a machine. So there was a standard
 21 line I certainly put in when I worked with the
 22 other people when I did the advocacy, or the
 23 barristers in conference used that line always
 24 and they always had someone come back to say
 25 that it's properly working, it was properly --

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1 you know, how it operated and it was working.
 2 I think there was two or three things I always
 3 used to put in, because it's a machine. It can
 4 go wrong. So we need somebody to say, "Look" --
 5 how it operated, whether it worked or it didn't.
 6 **Q.** So it was your view that it was a necessary
 7 element --
 8 **A.** I -- absolutely.
 9 **Q.** -- of the prosecution case right from the
 10 beginning, irrespective of whether a prospective
 11 defendant had raised a Horizon integrity issue?
 12 **A.** Well, it was a standard one that everybody
 13 agreed with and I used. I didn't look behind
 14 it, or maybe I should have done. That's what we
 15 did. And then we had somebody, I don't know
 16 who, actually had a witness statement to that
 17 effect. And then, you know, subsequently, if it
 18 was raised, like the Mrs Misra case, it would
 19 have been investigated and further enquiries
 20 made and further documents obtained. But that's
 21 the way, you know, the -- our advice was
 22 structured.
 23 **Q.** How did you satisfy yourself that there was
 24 an actual loss in each case?
 25 **A.** Well, it would be the interview, then you had
 197

1 know, that's when it was triggered off. But
 2 the -- initially, that's -- those are the way
 3 the, you know, the case actually progresses from
 4 the outset.
 5 And then, as and when the case progressed
 6 further, further evidence -- the Horizon Issues,
 7 if they came about, that's when the data
 8 transaction logs were requested but they weren't
 9 requested by -- I requested from the
 10 Investigation Officer and the Investigation
 11 Officer obtained it from whoever, and now we
 12 know there they -- where they should have got it
 13 and maybe they should have got it from the
 14 outset, I don't know. But we didn't at that
 15 stage, at that time.
 16 **Q.** Was it your view that it was a matter for the
 17 defence to raise an issue with the working of
 18 the Horizon system for the defence to ask for
 19 ARQ data?
 20 **A.** I don't know whether -- it was not my view.
 21 I think that's the way we operated. If it was
 22 raised in interview, it certainly would have --
 23 the officer should have done that from the
 24 outset. But, looking back on it now, I'm
 25 surprised that nobody picked it up that that
 199

1 the --
 2 **Q.** Sorry, the interview?
 3 **A.** Not -- well, they -- interview in the sense
 4 that, you know, what's the subpostmaster's
 5 explanation, what he's saying. Then you firstly
 6 have the Auditors. The Auditors would go in and
 7 they would sort of audit the, you know, the
 8 branch and they find a shortage. Then there was
 9 the interview. Then it was the operation of the
 10 system itself. Then you had witness statements.
 11 The access, who actually, you know, put the
 12 figures on the system itself.
 13 You know, that type of -- that's the sort of
 14 evidential side of it, I would have looked at,
 15 initially. Then as the matter progressed, you
 16 got more and more evidence that adds to it.
 17 **Q.** Was audit data or were transaction logs sought
 18 as part of the initial investigation or only if
 19 the subpostmaster raised the Horizon integrity
 20 issue?
 21 **A.** Well, looking back on it now I think that was
 22 essentially done -- that should have been done
 23 right from the outset, but it wasn't. That was
 24 if the subpostmaster raised the issue or
 25 subsequently Section 8 application, or -- you
 198

1 should have been obtained, you know, initially
 2 from every single case.
 3 **Q.** Can we look at a passage in your witness
 4 statement, please?
 5 **A.** Where are we.
 6 **Q.** It's page 34, paragraph 99 and 100.
 7 **A.** Sorry, say it again?
 8 **Q.** It will come up on the screen, Mr Singh.
 9 Page 34, paragraphs 99 and 100.
 10 **A.** Okay.
 11 **Q.** Thank you.
 12 **A.** 99, yeah.
 13 **Q.** And 100. You're here dealing with Mr Blakey's
 14 case and it's just something you say. You say:
 15 "From my recollection and from reviewing the
 16 documents, the workings of the Horizon system
 17 were never raised as an issue and ARQ data was
 18 never requested by the defence. I cannot
 19 comment on any investigation as this would have
 20 been carried out by the Investigation and
 21 Security Team, prior to me receiving the file.
 22 "Mr Blakey was represented by solicitors and
 23 Counsel who were entitled to request any
 24 evidence that they needed to support his
 25 defence. In addition, the Defence are able to
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1 make a Section 8 application for disclosure
2 should his legal representatives have thought
3 that evidence was being withheld from him.
4 Mr Blakey pleaded guilty and no such request was
5 made."

6 The ratio, the essence of the Court of
7 Appeal's decision in *Hamilton* is that obtaining
8 the evidence that the Post Office relied on to
9 prove that it had sustained a loss was not
10 something to be subcontracted to the defence to
11 raise.

12 A. Yes.

13 Q. It was a necessary step for the prosecution to
14 prove the case. I think you understand that now
15 having read --

16 A. Yes, of course, yes.

17 Q. -- the Court of Appeal's decision. Aren't you
18 here in these paragraphs throwing the obligation
19 back on the defence? Isn't that what you're
20 doing by these paragraphs?

21 A. Well, obviously I'm wrong. I mean, it should
22 have been done from the outset. I mean, yeah,
23 I agree. It should have been done from the
24 outset. That's what we did. It was wrong and,
25 I think, certainly counsel's opinion/advice

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1 I accept that wholeheartedly, and I --

2 Q. It's just that you were still saying it in your
3 witness statement here, which is 6 October 2023.

4 A. I'm saying it because that's what we did.

5 I mean, if I put it like that, how could
6 I actually say that? I can't say that, can I?
7 This is how we worked. This is how we did
8 things in the year -- you know, from the year
9 2000 to 2012. I mean, if I put -- you know, all
10 that sort of stuff, you'd be taking me to the
11 contrary view. You didn't do it, why didn't you
12 do it? Mr Blakey, why didn't --

13 You know, maybe I'm saying too much but I do
14 feel it very strongly, I do feel really hurt
15 that we didn't, that we let 12 years go by and
16 nobody picked that up and said "Where are the
17 ARQ, how the hell are we proving this?" You
18 know, but that's the way we did and that's why
19 we are here today, and we shouldn't be here.

20 Q. That can come down, thank you. I think it's
21 right, therefore, as you tell us -- I'm not
22 going to ask for these to be put up, but it's
23 paragraphs 89, 109, 123 and 146 -- that audit
24 data was not requested in a number of criminal
25 proceedings which ended up in a conviction?

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1 didn't come -- said that we should. Maybe one
2 of us should have done, and, you know, sort of
3 said, "No, we're not having it, we need that",
4 and that is a sad reflection of where we are
5 today, and we shouldn't be.

6 Q. Is what you express here in these paragraphs, in
7 99 and 100, essentially the view that was
8 operative throughout your time in the Post
9 Office when you prosecuted, that the obligation
10 was on the defence to raise Horizon integrity
11 and proof of loss, ie essentially reversing the
12 burden of proof?

13 A. Well, otherwise, I wouldn't have put it in,
14 would I? I mean, that's my witness statement,
15 to the best of my -- you know that's the
16 statement I made. That's what we did. But as
17 to the -- your second bit, I'm not sure I would
18 go as far as that. I mean, I don't -- I think
19 we're sort of -- I mean certainly from my point
20 of view, I'm a normal person, if I thought there
21 was something wrong, we needed to obtain it,
22 I would have done it. But, obviously, I didn't
23 and I was wrong.

24 Looking back on it, you know, it's in black
25 and white why the Court of Appeal have -- and

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1 A. Please explain to me, it's late in the day, I'm
2 not as young as I used to be. Say that again,
3 slowly, please?

4 Q. You tell us passages in your witness statement
5 when you're referring to case studies that we're
6 looking at, and it's paragraphs 89, 109, 123 and
7 146, so four cases --

8 A. Yes.

9 Q. -- that audit data was not requested in criminal
10 proceedings?

11 A. Is that what I say? Where do I say that, audit
12 data?

13 Q. Let's have a look, if you want to look at it --

14 A. Are you talking about whatever it is, AQ,
15 whatever it is?

16 Q. ARQ data. Paragraph 89.

17 A. Sorry, yeah, hang on.

18 Q. On page 30.

19 A. 89. (*The witness read to himself*).

20 Yeah.

21 Q. There is no data --

22 A. Yeah.

23 Q. So what I've done is I've looked at each of the
24 passages in your statement, over four different
25 cases, where you say, "We didn't seek ARQ data

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1 in those cases".

2 **A.** We didn't, no. Whether the officers did at the

3 outset, but we didn't get copies and, as I say,

4 if I'm making this statement I wouldn't be

5 saying that, would I? Certainly in the Blakey

6 case, you had Jayne Kaye explaining the system,

7 the workings of the Horizon system and the

8 operation of it, but as to the logs, they

9 weren't there.

10 **Q.** If we look forward to page 37, paragraph 100,

11 that's Suzanne Palmer's case, yeah? No Horizon

12 data was requested in this case, yes?

13 **A.** Did you say page 37?

14 **SIR WYN WILLIAMS:** Yes, I think Mr Beer means

15 paragraph 109 --

16 **MR BEER:** Oh, I'm so sorry.

17 **SIR WYN WILLIAMS:** -- on page 37.

18 **MR BEER:** Thank you.

19 **A.** Yeah, yeah sorry, yeah, yeah, well, that's what

20 it says. I mean, I looked at the paperwork you

21 supplied, and it wasn't there, so if it wasn't

22 there, we didn't request it or the officers

23 didn't request it.

24 **Q.** Page 41, please, paragraph 123. This is dealing

25 with Susan Rudkin's case, no Horizon data was

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1 and maybe it's something -- I don't know the ins

2 and outs of it.

3 **Q.** So in these cases, and there are many, many

4 more --

5 **A.** Yes.

6 **Q.** -- the Post Office did not obtain audit data,

7 correct?

8 **A.** Yes, correct.

9 **Q.** Thank you. That can come down.

10 Why did the Post Office not routinely obtain

11 audit data to inform investigative and

12 prosecutorial decisions.

13 **A.** I don't know. I mean, I am not the part of the

14 team to make that decision and, like I explained

15 to you, the initial advice was formulated the

16 way I explained to you.

17 **Q.** At the time, why did you think it was

18 appropriate for the Post Office to launch

19 criminal proceedings against branch staff

20 without first confirming, through audit data,

21 that there was proof of an actual loss?

22 **A.** Well, I -- in the whole business, including the

23 lawyers -- now, of course, we were wrong, should

24 have been requested -- we didn't. We were led

25 to believe that the system was perfect. We had

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1 obtained in this case or requested in this case,

2 correct?

3 **A.** Yeah.

4 **Q.** Paragraph 146, on page 46, at the foot of the

5 page on page 46.

6 **A.** Yeah, well --

7 **Q.** Just scroll down, thank you:

8 "No Horizon data was requested from Fujitsu

9 in this case. However in my advice note [it

10 says] I have requested further witness

11 statements, including a statement addressing the

12 IT system?

13 **A.** That's the Julian Wilson case, isn't it?

14 **Q.** It is?

15 **A.** Yeah, I think that's -- I think he mentioned

16 that there's a problem with the Horizon.

17 I think I did, in my advice, ask for it but

18 subsequently counsel confirmed it. I did sort

19 of send counsel's advice and requested it but

20 it's -- subsequently Mr Wilson/counsel, they

21 pleaded guilty for the data was in hand. But

22 I -- that case was -- I think there was advised,

23 or whatever it is, subsequently, by Rob Wilson

24 and I think he also amended the charges and

25 I think also the basis of plea was agreed by him

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1 training and I think even the trainer said it

2 was a foolproof system. Firstly, I think when

3 the system was first put in place, I went to

4 training and then I think when I moved to Old

5 Street on 1 April, I took a lot of our

6 barristers from the southwest, I think it was,

7 and the Midlands, for the training, and he

8 explained it in such a way that he said "Well,

9 it's foolproof. You put in what you get out",

10 type of thing.

11 **Q.** Sorry, who told you the system was foolproof?

12 **A.** The trainer. The trainers from -- who trained

13 everybody on the Horizon system, including the

14 Legal team. And I -- because I had been through

15 the Misra case, I was conscious of the fact that

16 every person who dealt with the -- with any of

17 the subpostmasters should go on that training.

18 I went on it, I took some of the barristers

19 chambers, prosecutors, and we wouldn't -- nobody

20 would prosecute unless they'd been on that

21 training. So we were obviously misled, or

22 whatever you like to call it, that the system

23 worked very well.

24 **Q.** Was it the Post Office's strategy to put the

25 onus on subpostmasters to request audit data in

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1 prosecutions, rather than the Post Office
 2 obtaining it and disclosing it as a matter of
 3 practice?
 4 **A.** Not that I'm aware of but, certainly, what
 5 I explained to you, the way the initial advice
 6 was formulated to the Investigation Team, it
 7 should have done. They should have -- I mean,
 8 it wouldn't have taken very long to put in
 9 a paragraph instead of saying "Get in somebody
 10 to do a witness statement", to actually say "No,
 11 get this data". But nobody picked it up, and
 12 certainly people above me, who had more
 13 experience and knowledge of it didn't, and
 14 I don't know whether I was in a position to do
 15 it or not to do it, but certainly we didn't.
 16 **Q.** Can we look at the way you approach things by
 17 using Ms Misra's case as an example, and look at
 18 POL00053746. We see this is a letter dated
 19 11 January 2010 to Coomber Rich --
 20 **A.** Oh, yes.
 21 **Q.** -- foot of the page, written by you.
 22 **A.** Yeah, that's me.
 23 **Q.** Then if we scroll up, thank you. You say:
 24 "I have now reviewed the papers in the above
 25 case, particularly your request for disclosure,
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1 our disclosure obligations by the absence of
 2 an adequate defence statement. The credibility
 3 of your client may be also damaged at trial if
 4 no adequate defence statement is served."
 5 But was it the Post Office's general
 6 strategy, looking at this document, to require
 7 subpostmasters to fully particularise the
 8 problems with the Horizon system in their
 9 defence?
 10 **A.** I can't give you an answer that but, certainly,
 11 in this particular case, it's the view we took,
 12 yeah -- I mean, the view I took, and I think
 13 I took it on the advice of the -- I think it's
 14 gone to the Crown Court, hasn't it? Where are
 15 we?
 16 **Q.** By this time it had. It was in the Crown Court.
 17 **A.** In March, and what's the date of this email, is
 18 it --
 19 **Q.** It's a letter and I think, if we scroll to the
 20 top, we'll see it's January 2010?
 21 **A.** That's early -- earlier in the year. I think --
 22 hmm. I don't know the details of it, from what
 23 my recollection is, that it would help us to
 24 assist all parties if we knew where the starting
 25 point was, and I think the whole idea of
 211

1 and comment as follows.
 2 "We will respond to all reasonable requests
 3 and seek material that may undermine the
 4 prosecution case and support your client's
 5 defence. We understand in general terms that
 6 you are seeking to challenge the integrity of
 7 the Horizon system. We feel obliged to point
 8 out, however, that you have not as yet served
 9 a defence statement which raises any issue
 10 whatsoever with the Horizon system. If any
 11 apparent errors were occurring in the indictment
 12 period, your client should have a good knowledge
 13 of what they might be, simply because she would
 14 have regularly been checking the stock against
 15 the Horizon records. We take the view that
 16 a detailed defence statement is required in this
 17 case which fully particularises any problem with
 18 Horizon upon which your client would seek to
 19 rely at trial. The defence statement should
 20 obviously make clear what the issues in the case
 21 are. At the moment, we do not know whether your
 22 client still claims she was hiding thefts by
 23 members of staff and to what extent those
 24 alleged thefts contributed to the deficiency at
 25 the office. We are handicapped in fulfilling
 210

1 a defence statement is exactly that: what is the
 2 issues? What is your client saying there about
 3 the Horizon system or the operation of the
 4 apparatus?
 5 **Q.** But you were placing a burden here on the
 6 subpostmaster of particularising flaws in the
 7 Horizon system, weren't you?
 8 **A.** No, I don't think so. I think the -- my
 9 approach, in any case I dealt with, is always
 10 incorporation, working together, and here,
 11 I think -- I don't know who -- was it Issy Hogg?
 12 I used to have a long conversation with her, you
 13 know, and -- you know, well, not longest
 14 conversations, but one or two long enough, and
 15 say "Look, you know, we need to -- can you help
 16 with this? Can you help with that?" And
 17 I think, in turn, returned a lot of favours and
 18 said to her: "Look, I can do this, I can do that
 19 and then we can actually agree on certain
 20 aspects of it, so that I can start sort of
 21 moving or progressing this case forward".
 22 So I -- the way this pads out was the
 23 defence statement was, if they particularised --
 24 is it not the -- I mean I don't know -- I mean,
 25 I -- going back now, I mean, trying to think on
 212

1 it, is it not that the idea of the defence
2 statement is exactly that? What is your
3 client's defence? What are the issues? What
4 are the -- what are you saying that we did wrong
5 or what's -- you know, that's the way
6 I understood it, and that's where we were with
7 it. I mean, it wasn't --

8 **Q.** At this time, the Post Office hadn't disclosed
9 any audit data or call logs to Mrs Misra,
10 correct?

11 **A.** I don't know. I mean, I --

12 **Q.** Take it from me, the Post Office had not
13 disclosed any call logs or audit data to
14 Mrs Misra by 11 January 2010?

15 **A.** Yeah --

16 **Q.** How was Mrs Misra to fully particularise the
17 Horizon Issues experienced at West Byfleet
18 without at least access to that information?

19 **A.** It's a while ago. I mean, I -- I can only go by
20 what I've read and what the paperwork you sent
21 me -- I think there was no ulterior motive in
22 that. I think that the only way would be -- is
23 to try to assist and agree, you know, the
24 starting point more than anything else. I mean,
25 if it was up to me, I would have more or less

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1 something if I missummarise?

2 **A.** No, no, sorry, I take it. Sorry, about that.

3 Of course.

4 **Q.** It slows it down if every time we have to go
5 back and --

6 **A.** No, no, no, sorry, of course.

7 **Q.** I'm just summarising, so we don't have to get it
8 up on the screen.

9 **A.** No, perfect.

10 **Q.** You tell us that you played a role in obtaining
11 the audit data in the proceedings against
12 Mrs Misra because it was required by the
13 Investigation and Security Team, okay?

14 **A.** Yes.

15 **Q.** Can we look, please, at UKGI00014895, please.
16 It's an email from the defence solicitor, Issy
17 Hogg, to you, saying:

18 "We refer to Judge Critchlow's order ..."

19 There's a problem with their office system.

20 "We ... enclose a request for disclosure."

21 Third paragraph:

22 "We note that your response ... makes

23 a suggestion that our expert meets with your

24 investigating officer and representatives of

25 Fujitsu. Can we endorse that and emphasise that

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1 said, "Look, from the moment she started work,
2 or even the year before, here's the data and
3 even the year after", but the thing is it wasn't
4 as simple as that, and that's -- probably my
5 mistake in this case was that I thought it was
6 straightforward.

7 You know, the Post Office would want to
8 provide it but, then they had all sorts of
9 contract and agreement with the third party.
10 That's where the problem laid. But that here,
11 it wasn't what you're suggesting. I mean
12 certainly not when I read that email. It was
13 really a starting point with a view to
14 progressing it and trying to assist the defence
15 any which way I could.

16 Sorry, it's a long answer, I shouldn't
17 really -- no, that's not what this is about.

18 **Q.** You tell us in your witness statement at
19 paragraph 256 that you played a role in
20 obtaining the audit data in the criminal
21 proceedings against Mrs Misra because it was
22 required by the Investigation and Security Team;
23 okay?

24 **A.** To -- 156?

25 **Q.** Again, I'm sure your solicitor will say

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1 we have, since July last year, been requesting
2 that our expert has access to data records,
3 a request that has been repeatedly rebuffed on
4 the grounds of cost and the work involved."

5 Why was the Post Office refusing to provide
6 Mrs Misra's defence expert with access to audit
7 data?

8 **A.** I don't know now but I -- certainly, it was out
9 of my hands. I think I did as much as I could,
10 but then there was that contractual commercial
11 relationship that the Post Office had with
12 Fujitsu, but it wasn't something that I didn't
13 want, or obstructing. I mean, obviously I'm the
14 lawyer in the case. I did all I could to
15 progress it, help it along, but it was --

16 **Q.** You knew that the only way to test whether
17 a problem had arisen at a particular office was
18 for a detailed analysis to be undertaken of the
19 relevant transaction logs, the audit data, at
20 a particular branch, didn't you?

21 **A.** Yes. No, I accept that but, I mean, it was not
22 lack of trying and not obtaining it. I wanted
23 to obtain it. I mean, I think if you go back --
24 you know, I don't know, September, October,
25 November, the first thing I did was to actually

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1 copy -- copied in the investigation and said,
 2 "Look, this is what the defence want disclosed.
 3 This is their enquiries. Please deal with it".
 4 Then I think subsequently matters transpired
 5 that it did.

6 **Q.** If we fast forward a couple of years, three
 7 years or so, to POL00060974, and look at page 3,
 8 please. Sorry, it's the bottom of page 2. If
 9 we scroll down, please, four lines up from the
 10 bottom, you say:

11 "The only way to test whether a problem has
 12 arisen at a particular office is for a detailed
 13 analysis of the relevant transaction logs to be
 14 undertaken as happened in the *Misra* case."

15 Then over the page:

16 "I imagine that the independent inquiry will
 17 be examining some, perhaps all, of the cases on
 18 Second Sight's requested schedule. In none of
 19 these cases were the transaction logs ever
 20 examined? This is time consuming and expensive
 21 though it may be the only way to investigate the
 22 concerns raised by these former
 23 [subpostmasters]."

24 So you knew that the only way to test
 25 whether a problem had arisen at a branch was for
 217

1 other things that I read from the impact
 2 statements, no.

3 **Q.** Okay, we'll go back to the story, then, back in
 4 February 2010. FUJ00122713. We've looked at
 5 the defence requests already for disclosure,
 6 from Issy Hogg, of audit data. Can we look now,
 7 please, at an email to you from David Jones, if
 8 we just scroll down a little bit further.

9 Thank you. You can see he's the Head of
 10 Legal in Fujitsu.

11 **A.** Yeah, yeah.

12 **Q.** If we scroll up we can see the date of this,
 13 February 2010.

14 "Jarnail,

15 "Thanks for your email ...

16 "I met this morning with Gareth Jenkins who
 17 came back into the office briefly to meet with
 18 me. Gareth will help with this matter."

19 Next paragraph:

20 "Attached is a first draft of a statement
 21 from Gareth ...

22 "You will see that there are some areas
 23 where Fujitsu cannot deal with the Defendant's
 24 expert's criticisms as they are about POL's
 25 procedures or requirements and it seems evident
 219

1 a detailed analysis of the transaction logs,
 2 didn't you?

3 **A.** Yes. Well, I said so in black and white.

4 **Q.** So if that was the only way to test whether
 5 there were Horizon Issues at a branch, why
 6 wasn't that obtained in each investigation and
 7 in each prosecution case?

8 **A.** Well, I -- you know, as you -- as previous,
 9 we -- that's the way the Post Office operated.
 10 That's the way they dealt with it, like
 11 I previously advised -- as I previously told
 12 you.

13 **Q.** Do you accept that expense and time is not
 14 a sufficient reason to obtain the audit data if
 15 it was the only way to determine whether there
 16 were problems at a branch?

17 **A.** That, the expense and the time consuming bit,
 18 didn't affect me at all. I wanted it but it
 19 was --

20 **Q.** That's an answer to a different question. Do
 21 you accept that time and expense is not
 22 a reason --

23 **A.** No, it's not a reason.

24 **Q.** -- to not obtain the data?

25 **A.** Not when somebody's liberty is at stake and the
 218

1 there will be a need for a POL internal 'expert'
 2 who can work with Gareth to deal with these
 3 areas."

4 Then this:

5 "One concern is that the [Post Office
 6 Limited] have not apparently requested
 7 transaction data for West Byfleet for the period
 8 and transactions in question. This would
 9 normally be provided in previous cases and would
 10 include Fujitsu extracting log files from the
 11 system to enable us to provide details of
 12 transactions. Surprisingly, this has not been
 13 requested in this case. Perhaps you would
 14 consider the need for this."

15 So it wasn't just the defence that were
 16 saying to you that you need to obtain the audit
 17 data; it was the people who developed, operated
 18 and ran the system were telling you it too,
 19 weren't they?

20 **A.** Yes, yes. There's no dispute about that. Yes,
 21 of course. You need them. It's essential.
 22 It's a must.

23 **Q.** Was audit data ever requested before a person
 24 was suspended or dismissed?

25 **A.** I don't know. That's a question for the
 220

1 Investigation Team. I didn't get involved in
2 that.

3 **Q.** Did you ever see a case in which audit data was
4 obtained before a person was suspended or
5 dismissed?

6 **A.** As I said to you, the Legal team saw the
7 investigation file. We -- what happened prior
8 to it, it didn't -- I can't say.

9 **Q.** Was audit data ever obtained before the file was
10 submitted to you for advice?

11 **A.** I don't know.

12 **Q.** Did you ever see an advice file that contained
13 audit data where you were asked to advise on
14 evidential sufficiency, ie before the lawyer was
15 asked to advise?

16 **A.** Not any of my files, no.

17 **Q.** Is the answer to the question, I was about to
18 ask why, the same as before: "It's just because
19 we didn't do it that way"?

20 **A.** Yeah. Are you asking specifically about
21 Mrs Misra here or are you asking generally?

22 **Q.** Generally.

23 **A.** Yeah. Well, you've read the papers. That's
24 what it is.

25 **Q.** Can we move forwards, please, to FUJ00122735.
221

1 an internal matter for the other departments.
2 I think if you -- from the emails you've
3 provided me with, there's a lot of emails which
4 I'm not copied into, whereby the Head of Fujitsu
5 Legal, David Jones, is having conversations
6 about that with the Commercial and Contract
7 Teams of the Post Office. And I think, at the
8 same time, the Investigation Officer says all he
9 can to get authority. And I think when we do
10 obtain authority, we got Penny Thomas, who was
11 the Prosecution Support Team, who -- Fujitsu
12 work with the Post Office, asking it's got to be
13 done in a certain way by a certain person within
14 the Post Office.

15 So that's where the answer is. It's not
16 because I don't want it or didn't request it;
17 it's the way the whole system operated.

18 **Q.** Can we see what you did when you were confronted
19 with this three-pronged request: defence
20 solicitor, Fujitsu and Mr Jenkins.

21 FUJ00152957, look at page 2, please.
22 I should just look at page 1, so you can see the
23 date of this, and scroll down. That's it.

24 Yes, your email, your secretary, on behalf
25 of you, to David Jones, 8 February. We've just
223

1 This is the same day. Mr Jones, Head of Legal
2 at Fujitsu, forwarding you an email from
3 Mr Jenkins, saying:

4 "Please see attached and Gareth's comments
5 on the need for an examination of the underlying
6 log files and timing of this."
7 If we scroll down, please.
8 Mr Jenkins said:
9 "The simple answer is that without
10 retrieving the logs everybody is speculating and
11 as discussed this morning nobody has bothered to
12 ask us for any logs. At this stage it is not at
13 all clear what transactions are thought to be
14 missing at what time or even in what time
15 period. Analysing logs over a long period is
16 very, very time consuming. This is not going to
17 happen by Monday."
18 So again, the defence solicitor was asking,
19 the Head of Legal for the firm that developed
20 and operated the system was asking, and
21 Mr Jenkins, the proposed witness, was asking for
22 the logs -- the ARQ data -- to be obtained. Why
23 hadn't it happened by now?

24 **A.** Well, I think you've got the emails.
25 I certainly requested it. It's really
222

1 been looking at email exchanges of 5 February,
2 so we're three days later now. Over the page,
3 please, you say, fourth paragraph:

4 "We are keen that the defence are given
5 suggestions as to how they can efficiently test
6 their theories against the Horizon data. We
7 don't want them to say they will not have time
8 before the trial. We anticipate that it would
9 not be very difficult to test their theories
10 against a short but ..."

11 I think that's supposed to be
12 "representative"; is that right?

13 **A.** Yeah, represented, yeah.

14 **Q.** "... but [representative] span of data [for]
15 example from the months when Mrs Misra has
16 admitted false accounting, (15 November to
17 14 December 2006, 16 May to 16 June 2007,
18 14 November 2007 to 15 December 2007 and
19 9 January 2008). It would be helpful if
20 Mr Jenkins could consider practical and
21 efficient ways in which the defence might be
22 able to test their theories."
23 So you said that the Post Office essentially
24 was keen for a short but representative span of
25 data. Where did you get these dates from?
224

1 **A.** Well, I'm now working with the barrister in the
2 case. I'm conscious of the fact of the
3 complexity of the case. So what I'm doing is
4 two things: firstly saying, "Look, this is where
5 we are. What do we do?" and I think his advice
6 has been, "Well, let them start with this", and
7 that's more or less what I have asked.

8 **Q.** These dates seemed to be dates for the months in
9 respect of which Mrs Misra admitted to false
10 accounting.

11 **A.** I think --

12 **Q.** What was the relevance of those months?

13 **A.** I don't know. I mean, looking -- the problem
14 I have today is that -- or generally has been,
15 is -- because I can't go back in time. I mean,
16 at that time, obviously I had more detail, a lot
17 more information as to where we are. Today
18 I can't give an explanation as to where I got
19 the dates.

20 But, certainly, you know, it would have been
21 from advice and discussions with the trial, you
22 know, the barrister who had been briefed or
23 instructed on that, because that's the way
24 I worked. I have always -- before I'm making
25 these sort of decisions, I would always get

1 a formulated, constructive advice before I move
2 forward. And I was given those dates, "This
3 would be helpful, and suggest that". Then
4 I did.

5 **Q.** So do you think you got those from Mr Tatford?

6 **A.** Yes, I would have, yes.

7 **MR BEER:** Thank you, sir.

8 Sir, that's a convenient moment to break for
9 the day.

10 **SIR WYN WILLIAMS:** All right. Thank you very much.
11 I don't suppose you will want to talk about
12 this case overnight, Mr Singh, but if you do,
13 please don't. All right?

14 **THE WITNESS:** Thank you, sir.

15 **SIR WYN WILLIAMS:** We'll resume again at 10.00
16 tomorrow morning.

17 **MR BEER:** Thank you, sir.

18 **(4.27 pm)**
19 **(The hearing adjourned until 10.00**
20 **the following day)**

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24
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<p>would... [195] 44/9 45/4 45/13 45/22 45/23 46/4 47/19 48/8 48/10 48/12 50/16 50/17 50/20 51/20 51/21 51/23 51/24 53/1 53/20 54/2 54/3 54/6 55/1 55/4 57/11 58/23 58/24 59/18 61/1 64/12 66/1 70/1 70/8 74/18 75/2 77/20 82/8 89/15 89/18 92/6 92/16 92/22 94/23 95/3 102/23 103/2 103/4 103/7 103/16 106/22 108/16 109/18 109/22 109/23 110/1 111/20 112/10 112/13 112/17 112/22 117/12 121/25 122/22 123/1 123/6 124/18 125/2 126/10 126/17 128/14 128/15 132/22 135/8 136/22 138/21 139/24 139/25 141/2 141/18 141/25 142/3 142/24 144/5 145/15 148/6 148/8 148/8 149/19 151/3 151/9 154/11 154/11 154/13 155/25 157/4 158/4 158/13 158/19 158/22 160/24 161/17 163/17 164/22 165/4 165/8 165/12 166/20 167/5 167/9 167/13 167/14 169/7 169/9 169/9 169/10 176/8 176/18 179/4 179/7 179/7 179/8 179/11 179/13 179/21 179/22 180/3 181/2 185/10 185/13 185/19 185/22 186/11 186/12 186/13 186/22 186/23 187/1 187/5 187/24 188/9 188/10 188/16 189/7 189/8 189/9 189/13 189/17 190/13 190/14 190/25 190/25 191/13 191/13 191/13 191/14 191/22 191/23 191/24 192/7 192/11 193/4 195/1 195/8 195/9 195/11 195/12 195/13 196/8 197/18 197/25 198/6 198/7 198/14 199/22 200/19 202/14 202/17 202/22 205/5 208/20 210/13 210/18 211/23 213/22 213/25 214/7 220/8 220/9 220/13 224/8</p>	<p>224/19 225/20 225/25 226/3 226/6 would/does [1] 75/2 wouldn't [32] 46/19 51/12 57/15 58/15 59/17 61/15 69/25 70/10 96/20 102/21 108/7 108/7 120/23 141/17 141/20 141/24 142/3 142/8 143/7 143/14 148/7 149/18 154/15 168/9 171/16 174/19 181/1 185/18 202/13 205/4 208/19 209/8 write [8] 54/2 61/8 84/20 91/24 92/4 102/21 108/9 113/8 writing [10] 60/17 98/1 98/3 99/3 100/18 134/5 134/8 134/9 149/11 192/6 written [7] 12/15 88/1 146/20 149/18 181/18 181/18 209/21 wrong [24] 35/17 37/19 38/24 39/7 51/11 51/14 53/25 68/24 83/2 90/5 109/8 109/17 110/8 126/10 133/23 142/18 149/24 197/4 201/21 201/24 202/21 202/23 207/23 213/4 wrongful [1] 95/19 wrongly [3] 40/7 82/13 142/12 wrote [6] 69/16 82/5 93/17 104/14 104/16 133/8</p>	<p>193/4 193/5 194/25 194/25 200/12 201/22 204/17 204/20 204/22 205/11 205/19 205/19 205/19 205/19 206/3 206/6 206/15 209/22 211/12 213/15 219/11 219/11 221/20 221/23 224/13 224/13 year [33] 12/9 27/6 36/3 61/14 61/14 65/6 72/16 75/4 82/10 82/11 84/23 84/23 85/21 113/11 113/11 118/14 119/5 148/20 148/21 150/2 152/23 153/2 153/11 160/1 163/17 166/2 166/23 203/8 203/8 211/21 214/2 214/3 216/1 years [23] 1/15 18/16 19/3 19/10 19/10 22/25 46/1 65/5 73/16 91/8 93/19 96/12 96/13 96/13 140/13 141/5 141/14 180/11 184/5 190/8 203/15 217/6 217/7 yellow [1] 77/15 yes [235] yesterday [1] 103/20 yet [3] 88/15 147/20 210/8 you [1067] you'd [7] 5/23 6/11 9/6 15/10 18/20 30/10 203/10 you'll [3] 97/25 129/15 142/23 you're [58] 29/3 32/3 34/11 37/25 41/5 42/2 42/25 47/8 49/4 49/6 49/15 51/11 59/25 61/19 61/25 68/12 69/1 69/3 76/4 76/6 80/5 81/2 84/11 85/8 99/11 103/7 103/11 105/1 119/9 121/1 126/12 127/7 133/14 133/20 140/19 143/2 145/12 146/17 148/2 148/15 149/11 150/12 152/5 152/12 163/6 164/4 166/18 168/13 168/16 168/19 171/14 177/12 180/3 187/15 200/13 201/19 204/5 214/11 you've [30] 12/4 28/2 28/9 37/12 37/13 38/2 38/3 44/13 48/17 54/4 58/16 69/24 76/15 86/24 99/5 100/25 139/2 143/23 155/3</p>	<p>155/3 155/4 155/22 166/25 168/13 170/7 175/16 181/7 221/23 222/24 223/2 young [5] 52/23 65/1 69/7 69/9 204/2 your [160] 3/22 4/9 4/10 4/17 5/3 5/18 5/22 11/21 12/11 12/12 12/15 12/16 12/24 12/25 13/3 13/5 13/5 13/6 13/6 13/25 14/20 15/17 21/9 21/17 22/2 22/21 22/22 30/2 32/14 34/8 34/16 36/15 37/5 37/13 37/19 38/16 41/25 47/8 48/6 48/17 49/6 52/5 53/2 54/23 57/13 57/15 59/7 60/9 60/22 61/8 62/5 62/17 63/19 63/24 64/11 66/14 68/22 69/16 77/20 78/4 78/19 80/19 81/20 82/20 82/24 83/15 83/17 84/1 84/5 91/16 92/21 92/24 93/17 93/18 97/3 97/4 97/7 98/1 98/3 99/14 100/24 101/9 102/12 104/5 104/11 105/1 105/23 107/21 113/3 115/1 115/2 115/8 128/10 130/18 137/1 137/14 138/10 139/23 140/7 140/12 141/7 141/11 141/19 143/8 145/6 146/17 146/19 148/15 150/20 151/5 155/17 158/18 160/20 161/14 161/22 162/7 165/7 166/5 166/15 166/24 168/9 172/16 173/17 174/17 174/19 175/1 177/12 177/22 181/25 184/3 185/13 186/22 187/6 187/16 190/4 192/23 195/11 197/6 199/16 200/3 202/8 202/17 203/2 204/4 204/24 209/25 210/4 210/12 210/18 210/21 211/3 212/2 213/2 214/18 214/25 215/22 215/23 219/15 223/24 223/24 yours [3] 136/1 158/16 169/16 yourself [7] 40/17 56/20 60/25 101/2 141/17 161/9 197/23</p>	