

Witness Name: Andrzej Konrad (Andrew) Bolc

Statement No.: WITN09670100

Dated: 28 November 2023

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF: ANDRZEJ KONRAD BOLC

I, ANDRZEJ KONRAD BOLC, will say as follows:

I make this statement in response to the Rule 9 Request dated 24th October 2023, in relation to my role at Cartwright King Solicitors (the firm) in the criminal prosecutions of Khayyam Ishaq, Grant Allen, Angela Sefton and Anne Nield, and working with Fujitsu Services Ltd (Fujitsu).

Background

1. I graduated from the University of Manchester with a BA (Hons) Degree in Economic and Social Studies. I completed the Common Professional Examination and Law Society Finals at De Montfort University Leicester. I qualified as a solicitor in October 1995, and was accepted onto the Duty Solicitor Scheme in London several years later. I have maintained my Duty Solicitor status since that time. In April 2008 I was granted Higher Rights of Audience (Criminal Proceedings).

2. I have worked continuously as a Solicitor since qualification. I initially remained with the same criminal defence law firm in London at which I had been articled, and was employed full time as an assistant solicitor in general crime for this legal aid practice. I represented clients at the police station and magistrates court and prepared their cases in the crown court. In November 2006 I joined Cartwright King as an assistant solicitor in their Leicester office and was made a senior associate shortly afterwards. Having gained my higher rights of audience in 2008, I spent several years in the firm's Higher Courts Advocacy (HCA) department, dealing primarily with plea and sentence hearings at the Crown Court. The firm decided to set up a private prosecution department. One of the directors of the firm had previously conducted prosecutions on behalf of amongst others, the RSPCA, the Environment Agency (fishing licence prosecutions) and the Royal Mail Group (the prosecution of postal workers). I was selected to join this department. There was no separate training provided for this role as a prosecutor, although I would have maintained my professional development obligations to undertake 16 hours of training per year. With regard to the work for POL I was told that I would be assisted by experienced investigators, and that POL regularly instructed Counsel that were familiar with their prosecutions. Aside from my involvement with Post Office Limited (POL), I subsequently also undertook advocacy for the above organisations on a handful of occasions. I have undertaken defence work for the police federation. Whilst at the firm I also conducted some education law and ran a small practice in this field alongside my criminal defence work. I left the firm in 2022.

3. My understanding was that the Royal Mail and Post Office were to become separate organisations on the 1st April 2012. That prosecutions for both had up until that point been conducted by the Criminal Law Team, Royal Mail Group, but upon separation the Post Office needed to create their own department. Rather than continue to employ numerous agents around the country to conduct these prosecutions, I understood it wanted to use a single firm as much as possible, and employed Cartwright King, as Agents, to carry out this work for prosecutions in England and Wales. This was to include, but not limited to advice on the sufficiency of evidence in relation to charging decisions. Other arrangements were to be put in place for Scotland and Northern Ireland. The first "Green jacket" files containing cases prepared for prosecution that were sent to me began arriving at my office in Leicester around March 2012. From July 2013, in light of the publication of the Second Sight Report into the Horizon IT system, which disclosed the existence of bugs within it, my involvement shifted towards a review process of all previous Royal Mail / Post Office prosecutions. After a number of months, as that process was gradually completed, I was moved onto other work, and no longer had any involvement with the Post Office. I was aware that the firm continued to have some involvement with the Post Office after that time, but I do not know in what capacity, and I am unaware of when any arrangements came to an end.
4. My recollection is that cases were referred to Cartwright King by Jarnail Singh. I cannot recall if files were initially sent to him from the security team based in Salford, or came directly to us.

5. I understood that once a case had been raised and was being investigated by a security manager, they built a green jacket file containing their report, statements and exhibits, including interview transcripts. As far as I can recall, in the cases that I dealt with these files were then reviewed by the Business Unit who recommended that prosecution should be pursued provided the evidence was sufficient to do so (POL00044013). It was at this stage that the file was forwarded to Cartwright King for that advice. The report from the investigator included the potential offences that they were investigating, and on occasion the offence they believed was most appropriate for charging purposes. Once an advice had been prepared this was returned to the security team. If the advice was that the evidence afforded a realistic prospect of conviction, the file would be forwarded to the designated prosecution authority within Post Office Ltd for the authority to proceed.

Working with Fujitsu Services Ltd (“Fujitsu”)

6. The circumstances in which I had contact with Fujitsu were limited to email exchanges I had with Gareth Jenkins for the purpose of obtaining reports prepared by him on behalf of Fujitsu with regard to the integrity of the Horizon system. I do not recall any direct communication with Penny Thomas although I can see from documentation provided to me that she was copied into email exchanges between myself and Mr Jenkins, and that I have been copied into emails between her and a Post Office security manager (FUJ00156539).

7. Gareth Jenkins had previously been used by the Royal Mail Group pre separation to give evidence in criminal prosecutions as an expert witness in cases where losses had been attributed by the defence to the Horizon system. He had prepared general reports on Horizon and Horizon Online Data Integrity, and had also been used to prepare reports addressing defence expert reports in specific cases. His email footer described him as a Business Applications Architect with Fujitsu's Post Office account, so I understood him to have particular expertise in relation to the Horizon system.

8. I believe that In-house Counsel had advised on the need for an expert report into the integrity of the Horizon system and the urgency of this was raised in an email exchange between Andy Cash, a director of the firm and Jarnail Singh on the 12th September 2012, to which I was copied in (POL00020489). Mr Singh explained that he had used Gareth Jenkins of Fujitsu in the past for such a purpose but raised the issue of his lack of independence. In-house Counsel who had also been copied into this email exchange responded that someone entirely independent would have been preferred. However, it seems that a decision to use Gareth Jenkins was in due course taken in any event due to the impracticality of obtaining an independent report in the timescale available in court proceedings. I understood that Jarnail Singh was ultimately responsible for instructing him and Rachel Panter within the firm had been given responsibility for organising the delivery of the reports required as the cases progressed through the courts (FUJ00156677).

Prosecution of Khayyam Ishaq

9. I have no recollection of the criminal prosecution of Khayyam Ishaq. From the documents provided to me¹ I believe this file was allocated to my then colleague Martin Smith and that he dealt with it.
10. As far as I can now see from these documents my involvement in this case extends to being copied into a number of emails, including 26th July 2012, when this was identified as a "Horizon" case (UKGI00001432), and 6th March 2013 (FUJ00154128) when I was asked to arrange for hard copies of exhibit reports to be printed out and passed onto colleagues attending court on this matter.

Prosecution of Angela Sefton and Anne Nield

11. At some point between the 3rd February 2012 and 1st March 2012 I received a "Green Jacket" file in relation to Angela Sefton and Anne Nield at my office in Leicester. The file contained amongst other documents, which I cannot now recall, an investigation report by Stephen Bradshaw, Security Manager (the investigator), interview summaries, and a letter of instruction dated 2nd February 2012 from the Fraud Team based in Salford and addressed to Royal Mail Group Criminal Law Team, which I assumed was now for my attention (POL00044013). The file contained no separate instructions to me, either identifying my specific role, or anything else. I believed I was acting as an agent for POL in the

¹ POL00046313, POL00046349, POL00045133, POL00046224, POL00046228, POL00056596, POL00056600, POL00065000, POL00057985, POL00057078, POL00046235, FUJ00154002, POL00057543, POL00057582, POL00046253, POL00058024, POL00058035, UKGI00001432, POL00046242, POL00046244, POL00046243, POL00045134, POL00059517, POL00046264, POL00059592, POL00059652, POL00059686, POL00046272, POL00046278, POL00059887, POL00046249, POL00060315, POL00046250, POL00089393, FUJ00124229, POL00052509, POL00057580, POL00059602, POL00059874, FUJ00124337, POL00059927, FUJ00154128, FUJ00154180 and POL00060113.

prosecution. I was not supplied by way of introduction with any policy documents in relation to the conduct of prosecutions by POL, disclosure or anything else. I was not supplied with any information in relation to the Horizon system, the details of any data it generated, issues relating to its reliability, any relevant cases, or details regarding any civil actions or otherwise.

12. The letter stated, "It is the Business Unit recommendation that prosecution should be pursued provided the evidence is sufficient to do so. Would you therefore please advise on the sufficiency of the evidence in this matter. I was immediately struck by the implication that considerations in relation to the business of POL formed part of the decision-making process when deciding on whether an individual should be prosecuted. It was also not clear to me whether I was supposed to consider strictly the sufficiency of the evidence or employ the wider test used by Crown prosecutors which required a realistic prospect of conviction and consideration of the public interest. When I asked for clarification regarding the public interest test, I was advised by Jarnail Singh that he considered that this test was always met whenever there were losses to the public purse (POL monies) and they were over a certain financial threshold akin to DWP prosecutions for benefit fraud.

13. Going by the date of my letter of the 1st March 2012, POL00057495, I suspect this was the first advice on charge that I prepared for POL, and was also therefore the first charging advice I had ever given in relation to a criminal prosecution. As far as I can recall, it was one of only two cases where I provided charging advice and was involved where the integrity of Horizon became an

issue. Prior to drafting the advice I recall making a telephone call to Stephen Bradshaw to introduce myself. There would have been a discussion about the case, but I cannot recall the details.

14. I stated in my opinion there was sufficient evidence to afford a realistic prospect of conviction for false accounting based upon the admissions made in interview to that effect. I did not believe charges of theft were made out, as I thought it impossible to identify who was responsible to the criminal standard or rule out the possibility of a third party being to blame. I would like to now add that in interview both Angela Sefton and Anne Nield categorically denied stealing any money. They acknowledged that the losses could have been down to human error, and gave examples of how this had happened. I concluded that this was probably the case.

15. I returned my advice to Salford, I did not know who made the final decision to proceed with the prosecution, although the investigation report cited the Senior Security Manager as the Designated Prosecution Authority (DPA). I understand from POL00105223, a Security Operations Casework Review dated 04/02/13 that a file from that time would be forwarded to Jarnail Singh and then the DPA for a final review and authority to proceed. I do not know what happened on this occasion.

16. Summonses were issued by Liverpool Magistrates Court dated 15th March 2012 (POL00044030 and POL00044033) and proceed by way of committal to the Crown Court with a plea and case management hearing listed for the 9th August 2012 (POL00056146). I progressed the file by way of casework but did not attend

any of the hearings or conferences throughout the proceedings. I think POL used local agents for the advocacy in the Magistrates Court and John Gibson of Counsel was instructed in relation to the Crown Court proceedings. I have not seen the brief containing his instructions, so cannot recall what it now said.

17. Statements were obtained from the Sub-postmaster, the POL auditors and security team who had attended the financial audit on the 6th January 2012; and a trustee and book keeper from the charity whose cash flow had been affected (POL00059459, POL00044037 and POL00044038) . Exhibits included the 40 suppressed giro deposit slips, the jointly signed letter by Angela Sefton and Anne Nield and the interview tapes and transcripts. These were obtained to support the charges of false accounting in the criminal proceedings.

18. Stephen Bradshaw, as well as being the investigator was also the Disclosure Officer in this case. He has identified himself as such in all of the relevant schedules. This is common practice even amongst the police in routine investigations. In addition I have seen that Jarnail Singh also appointed Helen Rose as a disclosures officer for "Horizon" cases generally to deal with the specific disclosure around previous challenges to the system.

19. Hogan Brown Solicitors requested disclosure papers in their letter of the 10th April 2012 to assist with plea and mode of trial prior to the first hearing in the Magistrates Court (POL00044206). I can see from my letter of the 1st March 2012 (POL00057495) that I prepared a statement (summary) of facts for this purpose, which would have been forwarded to both solicitors, although I have not seen a

copy of this now. I can also see that I reviewed the committal disclosure schedules before they were forwarded to the defence.

20. As far as I can recall my subsequent role in respect of disclosure requests and applications in this case was to forward these onto Jarnail Singh for his instructions and to relay these back to the defence. To request the investigator to carry out more tasks related to disclosure requests, and to seek advice from Counsel.

21. The defence statement of Angela Sefton dated 18/7/12 (POL00044036) included a request for details of complaints regarding the operation of the system from 2005, the steps taken to address these, and information regarding an ongoing investigation of these complaints by POL. This was being considered by Jarnail Singh in an email of the 23rd July 2012 (POL00058115) and with a copy being escalated within POL for a response to be prepared. The defence statement of Anne Nield (POL00044042-) contained a similar request for details of complaints and investigations into the Horizon computer system. This was followed up with a S.8 application for the same disclosure dated 12th September 2012, this time including a request for access to the Horizon computer system used by the defendant for inspection (POL00058294).

22. Advice was sort from Prosecuting Counsel John Gibson in relation to this application. Instructions to him from the firm were first reviewed by a Director within the firm and also In-house counsel, who considered that the defence should be offered the opportunity to test the system. Specific instructions were sort from Jarnail Singh about direct access to the system and a timetable for

service of the Fujitsu report. He responded by saying that defence experts had in the past attended the relevant sub post offices in the past to be able to analyse the relevant data etc. but asked to clarify the specifics (POL00058303). The response from Mr Gibson is not included in the documentation I have seen, but a letter to Anne Nield's solicitors dated 18th September 2012 (POL00058306) included reference to the ongoing 2nd Sight Investigation by Independent Auditors, the pending report from Fujitsu, and the following passage: "Defence experts have in the past attended the relevant Post Offices to be able to analyse the relevant data. Access to the system beyond that would need to be specified and approved by POL before being allowed".

23. Mr Gibson provided advice regarding the disclosure of Stephen Bradshaw's statement of the 20/9/12 and exhibit SB/51. Instructions regarding disclosure were also sent to Prosecuting Counsel on the 5th April 2012, with regard to the further evidence obtained by Stephen Bradshaw, and a further disclosure request from solicitors on behalf of Anne Nield (POL00044217). My response which would have been based on the advice provided is contained in POL00060279.

24. I also liaised with Mr Bradshaw to address specific disclosure requests made by the defence. A further statement from him dated 20th December 2012 addressed his enquiries relating to call log information for the branch with the National Business Support Centre (POL00044047, POL00044160). These showed that calls had been made to the Centre starting 4th August 2005 over the following 3 weeks regarding a loss of £592.21 which was suspected to relate to the lottery. He stated that the matter had been resolved in a call on the 25th August 2005.

25. Further enquiries were conducted in respect of this loss and addressed in a follow up statement of his dated 10th April 2013 (POL00060275). Business records indicated that Kevin Ryan, then the Branch Development Manager had attended the branch on the 6th September 2005, to explore what had happened and was told by the officer in charge, (possibly Anne Neild or Angela Sefton), that it was something to do with the upgrade to Horizon online and that no errors could be found. When Mr Ryan attended the loss had cleared and there was no explanation. They also showed he had attended the branch on the 6th February 2006 regarding a shortage of £3959 in January 2006 and all documents, transactions and event logs were checked and there was no indication what had caused the loss. A history of audits undertaken at the branch was also set out as requested.
26. Gareth Jenkins had previously received instructions to prepare a report regarding the integrity of Horizon as it related to this case, and had been sent case summaries and defence statements for this purpose. I had chased this report on the 27th November 2012 as it was still outstanding and the trial was due to take place in January at that time. Rachel Panter was due to speak to him the following day and would raise it then. I received an email from Mr Jenkins on the 3rd December 2012 seeking clarification with regard to the content (POL00089394). He proposed to clarify that installation of Horizon occurred between 1999 and 2002, which did not accord with the start of losses at the branch from 2005, and refer to the migration from the original Horizon system to the new Horizon online system in 2010. He stated that it has already been established that it is not possible to examine the original Horizon system that was

operational until 2010. I took this to mean that this would have been self evident, as the counter terminals would have all been replaced in 2010 when the new system was installed.

27. There then appears to have been further discussion around events in 2005 regarding an update to the system to the weekly cash account. This was subsequently addressed in his report.

28. Mr Jenkins also makes reference to having not been presented with any audit data. By my response in an email at 14:20 that day it would appear that I had misunderstood him to be referring to the Horizon print outs obtained for the financial audit of the 6th January 2012 and had not understood the wider significance of what he was referring to (FUJ00153872).

29. I received no information by anyone from Fujitsu (or the Post Office) during the course of the criminal proceedings against Angela Sefton and Anne Nield with regard to known bugs, errors or defects in the Horizon IT system, past or current.

30. I would like to offer my apology to both Angela Sefton and Anne Nield for my part in the injustice they suffered and the awful impact this had upon them.

Prosecution of Grant Allen

31. A green jacket investigation file would have been sent to my office sometime in May or June 2012. My recollection is that my role in this case was to act as agent on behalf of POL, to include advice on the sufficiency of evidence and carry out case work as the file progressed through the prosecution.

32. When considering the file I read that a financial audit conducted on the 8th February 2012 had shown a cash shortage of £11,705 against his stock unit. Mr Allen admitted in interview inflating his cash on hand to achieve a balance, putting the approximate amount on the unusable notes line from April 2010 to February 2012. However, he had raised an issue with regard to data transfer following a relocation of his Post Office. My advice on charge in this matter is set out in full at POL00089057. In particular, at paragraph 4.iii) in the first 4 weeks there were wiring problems with the terminals, which he believed meant Horizon was not sending out (Polling) data. iv) in that period a £3,000 discrepancy arose in the accounts which could not otherwise be explained. At para 5 i) the Non polled report following the branch relocation showed that an engineer attended on the 16th and 17th March 2010 to complete a base unit build and that BT fixed a fault. However as of the 17th March 2010 the number of days Not Polled is shown as 12.

33. At para 7, "I would advise that an additional statement be provided by, I assume Mr Bradshaw, into the enquiries conducted after the interview with regard to the non polled report, and lack of calls to the Branch Conformation team and National Business Support Centre. With regard to the non polled report, a separate statement will be required explaining in lay man's terms, why this not show that data could have been lost during the 12 day period identified thus generating the £3000 loss as claimed by the defendant."

34. At para 8, "Subject to a satisfactory answer to the above query about the possibility of lost data then I would advise that a charge of fraud by false

representation would suit the circumstances described for the period covering Mr Allen's admissions in interview with regard to inflated cash declarations.... There is insufficient evidence to prove to the criminal standard who if anyone, actually stole money from the Post Office".

35. The advice with covering letter, and draft charge were emailed to Post Office security on the 4th July 2012, and copied to Stephen Bradshaw, Jarnail Singh, and members of the prosecution team within the firm.
36. A decision was taken to authorise prosecution and a summons dated 19th July 2012 was issued for Mr Allen to attend on the 30th August 2012. I prepared a summary of facts for the hearing set out in full at POL00089562, which included Mr Allen's account of the £3,000 discrepancy.
37. The case was subsequently listed for committal to the Crown Court on the 25th October 2012. Stephen Bradshaw is named as the investigator on the disclosure schedules, and I believe he would have been acting as the disclosure officer in this case. The case was then initially listed for a plea and case management hearing on the 10th December 2012.
38. Mr Allen was represented by Maidments Solicitors. I do not recall the contents of their letter from the 2nd November 2012, but I have responded to them on the 22nd November in relation to the Second Sight Report that was still pending at that time (POL00089376). I suspect that this response would have been drafted by POL. I do not know what considerations, if any were made by POL to either stay or adjourn the proceedings pending the publication of the report. I would

have thought that such a decision could only have been made at a much higher level within the organisation.

39. An entry in the investigation report (POL00089426) indicated that a telephone call had been made to the Branch Confirmation Team and they reported that they had not been contacted in relation to any £3,000 discrepancy. The call logs were also requested from the National Business Support Centre (NBSC) for the period of March 2010 to 23rd April 2012. No calls were listed with any discrepancies at the branch. A request for Help Desk Calls was made in an email to Gareth Jenkins at POL00089378.

40. Mr Jenkins was instructed to prepare reports in cases involving "Horizon" cases as already described in paragraphs 7 and 8 above. Case summaries and other relevant material was forwarded to him to be able to provide comment on specific cases to add to the general reports he had already prepared with regard to the different iterations of Horizon. Fujitsu made it clear that POL would have to pay for his time in preparing such reports. This was reiterated to the firm in an email from Jarnail Singh dated 19th November 2012 at POL00089374, which reads "the cost of obtaining data, statements is very expensive... legal, compliance and budgetary obligations puts further restraints on obtaining such data from Fujitsu. It is very important due process is strictly followed. I need to be notified if anything is required from Fujitsu". I suspect that this email may have been forwarded onto me or the general message relayed back.

41. Mr Jenkins would have been initially instructed by Rachel Panter from the firm to prepare these reports. I was not involved in that process. I contacted him on the

4th December 2012 to inform him that I had just spoken to Mr Allen's solicitor as she was going to ask the court to relist the case from the 10th December 2012 until the following January (POL00089378). I took the opportunity to ask him if he was able to comment specifically on the non polling data issue that Mr Allen had raised in interview and provided him with an extract, in addition to the case summary he had already been sent.

42. Mr Jenkins responded by email the following day. He believed he understood the issue being raised in relation to the initial loss. He stated any missing data would normally be recovered if communication issues were resolved within 35 days. He could make a general statement to that effect or carry out an analysis of the specific data to see exactly what had happened. He pointed out data retrieval was part of the standard service but his analysis would be chargeable to POL. He would not be able to carry out analysis until the new year.

43. I invited him to add his general comments at that stage regarding the safeguards in place for comms problems whilst I referred back to POL before incurring any expense as per instructions. I attached a copy of the non polling report previously obtained as I now understood its relevance. Mr Jenkins responded, "A look at the non – poll report shows that the branch was offline for 12 days, assuming it was OK after the last entry. The data should have been fully recovered assuming base units were swapped correctly and I'll cover that in what I say."

44. At page 3 of Mr Jenkin's report FUJ00124200 he stated, "(Data is held at the counter for a period of at least 35 days, so provide a comms outage is less than 35 days and operational processes regarding replacement hardware are followed

correctly, then no data should be lost.) I have not had an opportunity to examine the detailed logs from this period to see whether there were any issues, and any justifications in the claim that this resulted in apparent losses of £3,000 as claimed.”

45. I forwarded a copy of the draft report onto Mr Bradshaw for his consideration. In my email to Mr Bradshaw (POL00089380) I thought that the report had dealt with the non polling issue adequately but pointed out that “it is in fact possible for him (Mr Jenkins) to retrieve the actual data from this time to see what actually occurred at this branch.” That Mr Jenkins had stated the cost of the data was free to POL but that the analysis was chargeable. My email continues that I had told Mr Jenkins that we did not wish to incur additional costs unless unavoidable, although I hadn’t in fact said this to him. I cannot now recall why I added this comment. I asked Mr Bradshaw for his instructions. I emailed Mr Jenkins later on the 12 December 2012, to say “the investigator is happy with the report as it stands. Please could you proceed as before” (FUJ00153905). I do not know if Mr Jenkins ever conducted any analysis of the data specific to the case. Upon conclusion of the proceedings there seems to have been concern by Fujitsu that the case “might set a precedent” for comms issues to be a reason for losses.

46. I received no information by anyone from Fujitsu (or the Post Office) during the course of the criminal proceedings against Grant Allen with regard to known bugs, errors or defects in the Horizon IT system, past or current.

47. I would like to offer Mr Allen my apology for my part in the injustice he suffered and the awful impact this had upon him.

Statement of Truth

I believe the content of this statement to be true.

Signed: **GRO**

Dated: *28-11-23*

Exhibits to First Witness Statement of Andrzej Konrad Bolc

No.	URN	Reviewer Document Description	Control Number
1	POL00133265	Voucher Migration (via an OBC change).	POL-0137718
2	POL00044013	Internal Memo from Maureen Moors (POL Fraud Team) to RMG Criminal Law Team re Fazakerley Branch - Prosecution recommended (Sefton and Nield case study)	POL-0040492
3	FUJ00156539	Email chain with James Davidson, Penny Thomas, Peter Thompson and others - Re: RM v Bramwell Specifically - Horizon Integrity in general	POINQ0162733F
4	POL00020489	Email chain between Harry Bowyer, Jarnail Singh, Andy Cash and Helen Rose re Helen Rose disclosures report (defence expert reports & disclosure requests)	POL-0013681
5	FUJ00156677	Khayyam Ishaq, Ann Nield, Angela Sefton, Grant Allen case studies: Email from Rachael Panter to Gareth Jenkins, Andrew Bolc, Andy Cash and others Re: FW: POL cases raising Horizon - also regarding Kim Wylie and Jamie Dixon	POINQ0162871F
6	UKGI00001432	Khayyam Ishaq Case Study: Email from Martin Smith to Rachael Panter and Andy Cash RE: CASE no 24676- Prosecution of Ishaq	UKGI012246-001
7	FUJ00154128	Khayyam Ishaq criminal case study - Email chain with Jenkins Gareth, Andrew Bolc and Martin Smith - Re: R v Khayyam Ishaq [PKF-UK.FID2678503]	POINQ0160323F
8	POL00044013	Internal Memo from Maureen Moors (POL Fraud Team) to RMG Criminal Law Team re Fazakerley Branch - Prosecution recommended (Sefton and Nield case study)	POL-0040492

9	POL00057495	Angela Sefton and Ann Nield Case Study: Letter from Andrew Bolc to Post Office Ltd, RE: POL v Angela Marty Sefton and Anne Nield	POL-0053974
10	POL00105223	Security Operations Casework Review®	POL-0080848
11	POL00044030	Magistrates Court Summons for Angela Mary Sefton	POL-0040509
12	POL00044033	Summons letter (Magistrates Court 2267) addressed to Ms Anne Nield.	POL-0040512
13	POL00056146	Rowlands Castle Final branch Trading Statement from 16/02/2011 to 16/03/2011 re Lynette Hutchings case study	POL-0052625
14	POL00059459	Witness Statement of Tim Gordon-Pounder@Post Office Ltd re Angela Sefton and Ann Nield case studies®	POL-0055938
15	POL00044037	Witness Statement of Frances Ann Ellis	POL-0040516
16	POL00044038	Witness Statement of Christopher William Dixon	POL-0040517
17	POL00044206	Letter from Hogan Brown Solicitors to Mr S Bradshaw, Re Post office v Mrs Angela Sefton.	POL-0040685
18	POL00057495	Angela Sefton and Ann Nield Case Study: Letter from Andrew Bolc to Post Office Ltd, RE: POL v Angela Marty Sefton and Anne Nield	POL-0053974
19	POL00044036	Defence Statement re Angela Mary Sefton - R v Angela Mary Sefton	POL-0040515
20	POL00058115	Email from Jarnail A Singh to Simon Baker; Hugh Flemington, re: Horizon Challenge.	POL-0054594
21	POL00044042	Regina v Anne Nield Defence Statement	POL-0040521
22	POL00058294	Letter from Laurence Lee & Co Solicitors to Miss Waters re: Regina v Anne Neild	POL-0054773
23	POL00058303	Email chain from Jarnail A Singh to Hugh Flemington re: FW: R v Sefton & Nield Liverpool Crown Court 17th October 2012	POL-0054782

24	POL00058306	Letter from Andrew Bale to Laurence Lee & Co re: R v Anne Nield & another, Liverpool Crown Court regarding appointment of second sight.	POL-0054785
25	POL00044217	Letter from Mr Andrew Bolc (Cartwright King Solicitors) to John Gibson regarding 'R v Angela Sefton & Anne Nield', enclosing letters from the defence.	POL-0040696
26	POL00060279	Ann Nield case study: Letter to Laurence Lee & Co to Andrew Bolc re. Letter to defence where there is material to disclose - ongoing disclosure (defence case statement) R v Anne Nield & another Court and Next Hearing Date: Liverpool Crown Court - w/c 15/04.2013	POL-0056758
27	POL00044047	Unsigned Witness statement of Stephen Bradshaw - Fazakerley Branch.	POL-0040526
28	POL00044160	Extract of NBSC Call Log from Fazakerley branch	POL-0040639
29	POL00060275	Witness Statement of Stephen Bradshaw - Fazakerley Post Office – Nield & Sefton	POL-0056754
30	POL00089394	Email from Gareth Jenkins to Andrew Bolc, re: Sefton & Nield	POL-0086369
31	FUJ00153872	Email from Andrew Bolc to Gareth Jenkins re: Sefton and Nield.	POINQ0160067F
32	POL00089057	Post Office Limited Regina v Grant Ian Allen - Charging Advice	POL-0086032
33	POL00089562	Summary of facts - Post office Limited v Grant Ian Allen	POL-0086537
34	POL00089376	Letter from Andrew Bolc to Martin Bloor, RE: R v Grant Allen	POL-0086351
35	POL00089426	Post Office Ltd: Legal Investigation - Offences report	POL-0086401
36	POL00089378	Email from Andrew Bolc to Gareth Jenkins, RE: Post Office Ltd v Grant Allen	POL-0086353
37	POL00089374	Email chain from Jarnail A Singh to Rachael Panter, Andy Cash,	POL-0086349

		Martin Smith RE: POL cases raising Horizon	
38	POL00089378	Email from Andrew Bolc to Gareth Jenkins, RE: Post Office Ltd v Grant Allen	POL-0086353
39	FUJ00124200	Witness statement of Gareth Jenkins.	POINQ0130414F
40	POL00089380	Email chain from Gareth Jenkins to Steve Bradshaw, RE: FW: Post Office Limited v Grant Allen.	POL-0086355
41	FUJ00153905	Grant Allen Case Study: Email from Andrew Bolc to Gareth Jenkins re POL v Grant Allen - report	POINQ0160100F