

Friday, 15 December 2023

1
 2 (10.00 am)
 3 MR BLAKE: Good morning, sir, can you see and hear
 4 me?
 5 SIR WYN WILLIAMS: Yes, I can, thank you.
 6 MR BLAKE: Thank you very much, sir. This morning
 7 we're going to hear from Mr Bolc.
 8 **ANDRZEJ KONRAD BOLC (sworn)**
 9 **Questioned by MR BLAKE**
 10 MR BLAKE: Thank you very much. Can you give your
 11 full name, please?
 12 A. Andrzej Konrad Bolc, known as Andrew.
 13 Q. Thank you very much, Mr Bolc. You should have
 14 in front of you a bundle containing a witness
 15 statement behind tab A.
 16 A. Yes.
 17 Q. Is that statement dated 28 November 2023?
 18 A. It is.
 19 Q. Can I ask you to turn to the final substantive
 20 page, that's page 19?
 21 A. Yes.
 22 Q. Can you confirm that is your signature?
 23 A. It is.
 24 Q. Is that statement true to the best of your
 25 knowledge and belief?

1

1 was that your first job as a solicitor?
 2 A. Yes, I worked as a solicitor from qualification
 3 in 1995 at a different firm.
 4 Q. Up until you joined Cartwright King?
 5 A. Yes.
 6 Q. Was that a role involving prosecution or defence
 7 or something else?
 8 A. Criminal legal aid defence work.
 9 Q. Thank you, you were promoted to senior associate
 10 shortly before you joined Cartwright King --
 11 A. Yes.
 12 Q. -- and you spent several years in the Higher
 13 Courts Advocacy Department; is that correct?
 14 A. Correct.
 15 Q. Then you joined, I think, what you've called the
 16 Private Prosecutions Department; is that
 17 correct?
 18 A. Yes.
 19 Q. Can you recall what year it was that you joined
 20 that Private Prosecutions Department?
 21 A. 2012.
 22 Q. Thank you very much. Were there a number of
 23 different private prosecutions that were carried
 24 out by Cartwright King within that department?
 25 A. So one of the directors of the firm had previous

3

1 A. It is. Can I say I need to make an amendment in
 2 relation to one aspect of it. It relates to
 3 paragraph 29 and 46.
 4 Q. Thank you very much. Are those the paragraphs
 5 relating to your knowledge of bugs, errors or
 6 defects in the Horizon system? Can you just
 7 clarify for us what is the amendment that you
 8 would like to make?
 9 A. Subsequent to this statement, I received further
 10 documentation including an email I was copied
 11 into. It related to the case of *Wylie*, in that
 12 it mentioned that in the instance of a terminal
 13 failure, the transaction, that incident
 14 transaction, wouldn't be recorded. To that
 15 extent, I suspect that would be counted as
 16 potentially a defect in the system.
 17 Q. Thank you very much. That witness statement,
 18 WITN09670100, is now in evidence and will be
 19 published on the Inquiry's website in due
 20 course.
 21 I want to begin today by asking you about
 22 your background. You joined Cartwright King in
 23 2006 as an assistant solicitor; is that correct?
 24 A. Correct.
 25 Q. Were you a solicitor somewhere else before or

2

1 experience of prosecutions with the Royal Mail
 2 Group, and RSPCA, Environment Agency and maybe
 3 some others.
 4 Q. Thank you. How many of you were involved in
 5 Post Office prosecutions?
 6 A. There was a director overseeing matters, myself,
 7 Martin Smith, and a couple of in-house counsel.
 8 Throughout the period other people would come
 9 and out to do pieces of work.
 10 Q. You said there was somebody supervising. Who
 11 was that?
 12 A. Well, I don't know about supervising but the
 13 director was Andy Cash.
 14 Q. Thank you. Do you report directly to Andy
 15 Cash --
 16 A. Um --
 17 Q. -- or was there somebody in between the two of
 18 you?
 19 A. Potentially Martin Smith and then Andy Cash --
 20 Q. Thank you.
 21 A. -- maybe in that order.
 22 Q. In terms of people who were directly involved in
 23 Post Office prosecutions, we have yourself,
 24 you've mentioned Andy Cash, I think you've
 25 mentioned Martin Smith; is that correct?

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- 1 A. Correct.
- 2 Q. We'll see the name Rachael Panter?
- 3 A. Yes.
- 4 Q. Can you assist us with who she was?
- 5 A. I believe she was an assistant solicitor at the
- 6 time. She helped with the evidence provided by
- 7 Gareth Jenkins, primarily, I believe, and some
- 8 casework assistance.
- 9 Q. Did you supervise her or was there a working
- 10 relationship between the two of you?
- 11 A. Well, we worked together. I wasn't her
- 12 supervisor.
- 13 Q. You were the senior associate; she was, I think
- 14 you said, an assistant solicitor at that time?
- 15 A. Yes.
- 16 Q. Was there somebody who you both reported to or
- 17 supervised the two of you together?
- 18 A. I don't recall a specific supervision structure.
- 19 Q. That's three, four names. Were there more
- 20 people involved in Post Office prosecutions?
- 21 A. On an *ad hoc* basis there were some others,
- 22 I don't recall. There were some in-house
- 23 counsel, Mr Clarke, Mr Bowyer, some other
- 24 in-house counsel, on occasion, I believe.
- 25 Q. One of those is Harry Bowyer; is that correct?

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- 1 training you all or informing you all?
- 2 A. Not that I'm aware of, no.
- 3 Q. You've described in your witness statement as
- 4 acting as an agent for the Post Office?
- 5 A. Yes.
- 6 Q. What did you understand acting as an agent to
- 7 mean?
- 8 A. I think I said in my statement that the role was
- 9 quite unspecified and it wasn't clear exactly
- 10 where our duties started and ended in terms of
- 11 the overall prosecutions.
- 12 Q. Was there somebody who informed you about the
- 13 role that you were to play?
- 14 A. In what respect?
- 15 Q. Well, let's take Cartwright King on the one
- 16 hand. Was there somebody at Cartwright King who
- 17 said that you, as an agent, played a particular
- 18 role or were governed by a particular policy?
- 19 A. No, not that I recall.
- 20 Q. Who did you consider to be the prosecutor for
- 21 the purposes of the Criminal Procedure and
- 22 Investigations Act?
- 23 A. Well, the prosecuting authority I considered to
- 24 be Post Office Limited.
- 25 Q. Did you consider yourself to be bound by the

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- 1 A. Correct.
- 2 Q. What was your relationship with Mr Bowyer?
- 3 A. Sorry, in what respect?
- 4 Q. Did you work next to each other, in the same
- 5 room?
- 6 A. So I worked out of the Leicester office by
- 7 myself primarily, and Mr Smith worked in Derby.
- 8 I believe the others were based in Derby,
- 9 certainly from July 2013. I can't be certain
- 10 where they were based before that.
- 11 Q. Was there a reason why you were based in
- 12 a separate office at all?
- 13 A. I had always worked in Leicester.
- 14 Q. Were there others working on the Post Office
- 15 prosecutions in Leicester with you?
- 16 A. No, I believe my trainee at that time, at some
- 17 point, got involved and assisted with attending
- 18 court on one or two cases potentially.
- 19 Q. Thank you. Were there regular meetings between
- 20 those who prosecuted on the Post Office's
- 21 behalf?
- 22 A. There were meetings. I can't say that they were
- 23 regular. Most of the communication would have
- 24 been potentially via email or over the phone.
- 25 Q. Was there somebody who took responsibility for

6

- 1 same regulatory framework and standards when you
- 2 were acting for the Post Office, as when you
- 3 were acting for other private prosecutors?
- 4 A. I would have thought so, yes.
- 5 Q. Can you assist us with understanding the
- 6 relationship between Cartwright King and the
- 7 Post Office in terms of delineation of
- 8 responsibilities at all?
- 9 A. As I say, I think that was very blurred, as far
- 10 as I was concerned.
- 11 Q. Let's take as an example a disclosure schedule.
- 12 Did you see that as your responsibility or the
- 13 responsibility of the Post Office?
- 14 A. Well, the disclosure schedules in the cases
- 15 I dealt with were sent to me, so I took
- 16 responsibility for them, yes.
- 17 Q. In terms of your relationship with the Post
- 18 Office, was there somebody in particular who you
- 19 liaised with?
- 20 A. The Head of the Criminal Law Team was Jarnail
- 21 Singh, so he was my main point of contact with
- 22 the Post Office.
- 23 Q. Were there others who you liaised with that you
- 24 can recall?
- 25 A. The Investigators.

8

1 Q. Thank you. Do you remember when you first met
 2 Jarnail Singh at all?
 3 A. I remember where I met him. It was at the Derby
 4 office. I'd been called there for a meet and
 5 greet session, I believe, with him.
 6 Q. I think you said you joined in 2012. Was it
 7 February/March 2012?
 8 A. Yes, from the documentation I've seen it was
 9 around that time, yes.
 10 Q. Is it around that time that you met Jarnail
 11 Singh for the first time?
 12 A. It must have been pretty soon afterwards.
 13 I can't say when.
 14 Q. Did you have any views as to his abilities?
 15 A. Yes, I did.
 16 Q. Can you assist us with what those might have
 17 been?
 18 A. I wondered how he was in the position he was.
 19 Q. Why do you say that?
 20 A. I'm not sure he was suited to the
 21 responsibilities that he had.
 22 Q. Can you elaborate a little more?
 23 A. It's difficult to say, really. I just --
 24 Q. You're being quite diplomatic.
 25 A. Yes.

9

1 experienced Investigators. Are we to read
 2 anything into your choice of words in your
 3 statement?
 4 A. No, exactly that.
 5 Q. But was the reality any different?
 6 A. Oh, I see what you're saying. Well, they were
 7 certainly experienced, I believe. Yes.
 8 Q. I think you're suggesting perhaps that
 9 experience doesn't equate to competence; is that
 10 what I'm to read into --
 11 A. I'm not sure I would go that far but perhaps
 12 they were set in a certain way of doing things,
 13 yes.
 14 Q. Which way was that?
 15 A. Well, in terms of their investigation of the
 16 cases perhaps wasn't as thorough as it could
 17 have been.
 18 Q. Was that something that you were concerned about
 19 at the time or is that a later realisation?
 20 A. I think it became a later realisation, yes.
 21 Q. You also have said in your witness statement
 22 that the Post Office regularly instructed
 23 counsel that were familiar with the
 24 prosecutions?
 25 A. Yes.

11

1 Q. Was there anything about his abilities as
 2 a lawyer as you had concerns about?
 3 A. I wasn't sure about his abilities, no.
 4 Q. How about his conduct as a lawyer?
 5 A. Again, at times, it did raise an eyebrow.
 6 Q. Can you give us an example?
 7 A. I'm struggling to give you a specific example
 8 but perhaps some of the language he used.
 9 Q. What do you mean by that?
 10 A. He liked to keep things very simple. In terms
 11 of his understanding of the computer system, he
 12 described it as, I believe, a "fancy computer":
 13 "It adds money in, it deducts money going out.
 14 What could go wrong?" I think was the phrase he
 15 used, which I thought was somewhat of
 16 an oversimplification.
 17 Q. Sometimes we've heard in this Inquiry we've
 18 heard reference to a calculator. Did you mean
 19 computer or calculator?
 20 A. Sorry, yes, a calculator. A "fancy calculator"
 21 is how he described it.
 22 Q. Thank you. At paragraph 2 of your statement you
 23 say, "I was told I would be assisted by
 24 experienced Investigators". You say that you
 25 were told that you would be assisted by

10

1 Q. Did that also turn out to be incorrect or was
 2 that a fair summary of the position?
 3 A. In the cases I dealt with, the counsel
 4 instructed was John Gibson and I understood he
 5 had dealt with a number of these cases before.
 6 Q. Do you have any views as to his conduct of the
 7 cases that he dealt with for you?
 8 A. Not particularly that I recall. I never met him
 9 in person.
 10 Q. I want to ask you in general terms about the
 11 prosecutions you had conduct of. You say that
 12 the first Green Jacket files were passed to you
 13 in March 2012. Can you assist us with what
 14 a Green Jacket file is?
 15 A. I believe it was the Investigator's
 16 investigation file, essentially. It contained
 17 what I believed to be the documents that had
 18 been amassed during the course of their
 19 investigation, including an investigator's
 20 report and a letter from the business unit.
 21 Q. Would you receive that directly from the
 22 Investigator, from the business unit or from
 23 a lawyer?
 24 A. It just arrived on my desk, I don't know --
 25 Q. In hard copy?

12

1 A. In hard copy, indeed, yes.

2 Q. I think you said your first case was in March
3 2012; is that correct?

4 A. I believe so, yes.

5 Q. We're going to come to case studies probably
6 later this morning, Sefton and Nield and also
7 the case of Allen.

8 A. Yes.

9 Q. Were they your first or was there an earlier
10 case you were involved in?

11 A. They were the first -- the very first handful of
12 cases I gave advice on. There was a case of
13 *Bramwell*, which seemed to be coming to its
14 conclusion and that was included with the pile
15 of cases that I was given.

16 Q. Do you think *Bramwell* was probably the first
17 prosecution you were involved in, in that case?

18 A. Yes.

19 Q. Let's start by looking at a *Bramwell* chain of
20 emails. Can we look at FUJ00156530 and if we
21 could start looking at page 3, please.

22 Thank you very much. We have there an email
23 from Emma Haley at Stone King. Can you assist
24 us with what the relationship was at Stone King?

25 A. I think they've been instructed by the Post
13

1 stage, you're being made aware that there are
2 issues raised in a prosecution regarding the
3 Fujitsu Horizon system?

4 A. Yes, you could say that, yes.

5 Q. There's then reference to barrister training in
6 Cardiff. This is an email we've seen before in
7 this Inquiry. Are you aware of what that
8 involved at all?

9 A. No.

10 Q. If we scroll up, you then send the email to
11 Graham Brander, who is the Security Manager at
12 the Post Office.

13 A. I think he was the Investigator.

14 Q. Thank you. You say:
15 "Could you see if Fujitsu can work with
16 these rather vague instructions, otherwise
17 I think the only way forward is for you to meet
18 with Sue as soon as possible to help her
19 understand the system and iron out the specifics
20 ... "
21 If we scroll up on the second page, thank
22 you. There is then an email from Graham Brander
23 to Penny Thomas at Fujitsu, who points her to
24 the email below, and he says:
25 "Counsel would like Gareth to advise on what
15

1 Office to deal with the case locally.

2 Q. So despite both having the name "King" in your
3 titles --

4 A. No relation, yes.

5 Q. -- no relationship at all?

6 A. No.

7 Q. Did you, as a firm, assist Stone King? Did they
8 assist you? Did they pass cases on to you?

9 A. As far as I can recall, this was the only case
10 that we had any dealings with them.

11 Q. Okay. This email, 13 March, that's pretty early
12 on in your time?

13 A. Absolutely, yes.

14 Q. It's about the case of *Bramwell*, and she says:
15 "Counsel would, bluntly, like Fujitsu, like
16 to pour as much cold water as possible on the
17 defence report. If the expert is saying we
18 cannot disagree with anything at all, then we
19 are potentially in some difficulty. I have
20 asked Counsel to provide a specific list of
21 questions, but really the essence is: how much,
22 if anything, can we rebut? And can we explain
23 the accounting system to a jury in a way they
24 will find easy to understand?"
25 So it looks as though, from a very early
14

1 from the defence expert report faxed to you last
2 week that he is able to rebut if anything."

3 So quite early on in your career at
4 Cartwright King it seems as though you are
5 having some sort of involvement with Gareth
6 Jenkins; is that right?

7 A. Yes, it is.

8 Q. Thank you. I'd like to move on to another
9 email, and that's POL00096464. We're sticking
10 still with the case of *Bramwell*. Thank you.

11 If we look at the bottom email on that page,
12 we have Rachael Panter. So you've said she was
13 the associate solicitor at Cartwright King, or
14 assistant solicitor, sorry?

15 A. I think so. I'm not sure exactly what her title
16 was.

17 Q. 10 April. She is sending you emails regarding
18 Chris Bramwell and if we scroll down, that
19 includes, if we scroll down to the bottom of the
20 second page, a chain from Gareth Jenkins who
21 says:
22 "I was asked a couple of weeks ago about
23 papers covering Horizon integrity.
24 "I have a couple of such papers and it has
25 now been agreed I can pass them on to you."
16

1 There are two papers that he is attaching
2 there, one on Horizon integrity and the other on
3 Horizon Online integrity.

4 **A.** Yes.

5 **Q.** One further document I'd like to look at and
6 that is POL00058016. We're now moving to June
7 2012. I'll take you to the case studies in due
8 course but I'm just looking in very broad terms
9 at the kinds of issues that were cropping up
10 quite early on in your time at Cartwright King.
11 The bottom of page 1, we have an email of
12 12 June from Rachael Panter, to yourself, Andy
13 Cash and Martin Smith. She says:

14 "Dear All

15 "I have saved a copy on my personal file of
16 a Fujitsu report which covers all aspects to do
17 with the integrity of the Horizon system.

18 I think we forgot that we had this and they are
19 very expensive to have done. Luckily it is
20 a generic report that is not specific to one
21 particular case and will be able to assist you
22 when drafting advices where the integrity of the
23 Horizon system can be called into question.

24 "I will scan and save a copy of the [Post
25 Office] file for you to access when needed. We

17

1 this email chain but otherwise not.

2 **Q.** Issues about the cost of obtaining a report from
3 Fujitsu, is that something you were familiar
4 with?

5 **A.** Certainly became aware of that, yes.

6 **Q.** You became aware of that?

7 **A.** Yes.

8 **Q.** We'll see in due course various emails on that,
9 approximately when do you think you became aware
10 of the cost issues?

11 **A.** It could have been triggered by this email,
12 I suppose.

13 **Q.** Did you have a view or do you have a view on
14 using a generic report to rebut the criticisms
15 of the Horizon system?

16 **A.** Well, I think each case was specific. So
17 I would have thought any report would have
18 needed to address those specifics to be of any
19 worth.

20 **Q.** If we look at that top email we have from Andy
21 Cash to "all.Prosecution", so was that a generic
22 email address for everybody involved in Post
23 Office prosecutions or was that the prosecutions
24 team in general at Cartwright King?

25 **A.** I think they would have overlapped, yes.

19

1 have the case ..."

2 This the case of *Wylie*. I know it's
3 redacted there, we actually have an unredacted
4 version that will be uploaded to the document
5 management system in due course for Core
6 Participants to view:

7 "... in Newcastle at the moment where
8 counsel has encountered problems with defence
9 solicitors in the past where they had questioned
10 the Horizon system and unfortunately due to not
11 having any evidence to rebut such criticisms,
12 had to drop the case against them. This report
13 should hopefully prevent [that] from happening."

14 If we scroll on the first page to the
15 substantive email halfway down that page -- just
16 pausing there actually, the Horizon integrity,
17 the report that she is referring to, do you
18 recall that document?

19 **A.** No. No, I'm not sure if it's the same one that
20 was subsequently served or not.

21 **Q.** There's a later document that we will come to
22 but this is June 2012. How about the case of
23 *Wylie* and the Newcastle case? Was that
24 something you were aware of?

25 **A.** Only in the sense of being referred to it in

18

1 **Q.** He says:

2 "I copy this to all prosecution team for
3 info. Rachael, Martin and Andy B have most of
4 the work in hand now and we are building some
5 good relationships with officers.

6 "Rachael Excellent, well done on securing
7 this resource."

8 Then he talks about a chat with Jarnail
9 Singh. It seems as though Rachael, Martin and
10 yourself are identified as those with most of
11 the work in that area, is that a fair --

12 **A.** Yes.

13 **Q.** -- description?

14 **A.** It is.

15 **Q.** I'd now like to move to July, so the next month
16 in 2012. Can we look at POL00026567, please.
17 This is an Advice written by Harry Bowyer who
18 I think you've said was an advocate, he was
19 a barrister employed by Cartwright King?

20 **A.** In-house barrister, yes.

21 **Q.** An in-house barrister, thank you. Do you
22 remember this advice at all?

23 **A.** No.

24 **Q.** I'd like to take you through the advice and see
25 what you recall of the contents of the advice in

20

1 terms of broad picture, having been at
2 Cartwright King at the relevant time.

3 **A.** Can I just say, I've just seen this, this
4 morning.

5 **Q.** Yes. We're going to start on paragraph 1. This
6 is talking about the *Wylie* case, so that's the
7 Newcastle case that we've just been looking at
8 in emails. He says as follows. He says:

9 "In interview she attempted to blame the
10 shortfall on the Horizon accounting system. In
11 my early advice I advised that we would need to
12 prove the integrity of the Horizon system as
13 there was apocryphal evidence on the Internet
14 and elsewhere that the system was leading to
15 injustice."

16 Now, I had to look up the word apocryphal.
17 It means "doubtful authenticity". Do you recall
18 that being the view of your colleagues at
19 Cartwright King at the time, that around summer
20 of 2012, there was evidence of doubtful
21 authenticity on the Internet and elsewhere that
22 Horizon integrity was --

23 **A.** Yes, I would have been aware of that. I can't
24 say exactly when but yes. Pretty soon into the
25 process, yes.

21

1 I understand that the Post Office has announced
2 that it has appointed independent forensic
3 accountants, Second Sight Limited to conduct
4 an interpreter review of 10 cases based on the
5 Horizon system. Whether this announcement was
6 well considered or not is not an area that
7 I intend to address but the bell cannot be
8 unring and there will be consequences that will
9 have to be dealt with."

10 Were you aware, at that time, of concerns at
11 Cartwright King about the consequences of the
12 Second Sight investigation?

13 **A.** I don't recall exactly when I knew that that
14 Second Sight investigation had begun.

15 **Q.** If we say broadly the summer of 2012, so six
16 months or less into your time at Cartwright
17 King, were you aware of concerns about the
18 impact of the Second Sight investigation or
19 potential impact of the Second Sight --

20 **A.** Yes, at some point, yes.

21 **Q.** Thank you. If we could now look at paragraph 3.
22 He says:

23 "The first consequence is that we have now
24 given new ammunition to those attempting to
25 discredit the Horizon system. The argument will

23

1 **Q.** Was the view of your colleagues, and perhaps
2 yourself, that that evidence on the Internet was
3 not of substance?

4 **A.** I'm not sure if I had a view on that. I tried
5 to deal with the evidence that was presented to
6 me, rather than rely on what the Internet said.

7 **Q.** But if you believed what was on the Internet, no
8 doubt that would have been a very serious
9 matter, wouldn't it?

10 **A.** Of concern, absolutely, yes.

11 **Q.** So were you not concerned about it as at the
12 summer of 2012?

13 **A.** Yes.

14 **Q.** Yes, you were concerned or weren't concerned?

15 **A.** Yes.

16 **Q.** You were concerned about problems with Horizon
17 in the summer of 2012?

18 **A.** Yes.

19 **Q.** Yes.

20 **A.** Yes.

21 **Q.** Paragraph 2, please.

22 "The position of Post Office Ltd has, up
23 until now, always been robust. When the system
24 has been challenged in the criminal courts the
25 system has always been successful defended.

22

1 be that there is no smoke without fire and we
2 would not have needed to audit a bomb proof
3 system. We can expect this to go viral in that
4 any competent defence solicitor advising in
5 a case such as this will raise the integrity of
6 the Horizon system and put us to proof as to its
7 integrity."

8 Is that a concern that you shared at that
9 time?

10 **A.** It was a concern that was filtered through to
11 me and hence the need to get a report from
12 someone to say that the system was robust, yes.

13 **Q.** Are you able to assist us with how it was
14 filtered to you?

15 **A.** I can't recall.

16 **Q.** We look at paragraph 4, please. Paragraph 4
17 says:

18 "The extra evidence which we will be obliged
19 to gather will be as nothing in comparison to
20 the potential disclosure problems that we may
21 face. Until the Second Sight investigation is
22 concluded we will be in a limbo."

23 Was that a concern that you had at that
24 time?

25 **A.** Sorry?

24

1 Q. Did you consider that there may be implications
 2 as to whether or not to actually proceed at all
 3 with prosecutions whilst the Second Sight
 4 investigation was ongoing?
 5 A. In terms of staying the proceedings and the
 6 like; is that what you mean?
 7 Q. Yes.
 8 A. I have to be honest, it's not something I'd
 9 considered personally. I would have thought
 10 that would have been a decision taken at
 11 a higher level within the Post Office.
 12 Q. The disclosure problems that we may face,
 13 though, were something that you were aware of.
 14 The potential implications for disclosure of
 15 Second Sight's investigation, was that
 16 a firm-wide concern?
 17 A. I can't be sure.
 18 Q. Can we look at paragraph 5, please. Paragraph 5
 19 says:
 20 "I assume that we still contend that the
 21 system foolproof in which case we should defend
 22 it aggressively."
 23 Pausing there, did you consider that it was
 24 appropriate for a prosecutor to defend the
 25 Horizon system aggressively? Do you think
 25

1 astronomical. They should be made to understand
 2 that this is a firefighting situation and it's
 3 not just our house that would be burned down if
 4 of the system were compromised."
 5 Again, "our house".
 6 A. I'm not sure exactly what he's referring to.
 7 Q. Absolutely. I'm not asking you to interpret his
 8 words but the feel of this advice is that there
 9 were serious concerns within Cartwright King
 10 about the implications for the firm. Did you
 11 understand that feeling at the time?
 12 A. I'm not sure that I did, in that sense. I knew
 13 that this was a serious issue.
 14 Q. If we go down to paragraph 6, please. He makes
 15 three recommendations of things that he
 16 considers should be done. The first is:
 17 "We should identify the contested cases,
 18 civil and criminal, in which the Horizon system
 19 has been challenged. We should identify the
 20 areas of challenge and how we neutralise them.
 21 Any expert reports should be retained for
 22 evaluation. An expert should be identified and
 23 instructed to prepare a generic statement which
 24 confirms the integrity of the system and why the
 25 attacks so far have been unfounded. This expert
 27

1 that's an appropriate term to use for
 2 a prosecutor?
 3 A. Possibly not, no.
 4 Q. "I understand that the manufacturers have not
 5 been helpful up until now. My understanding is
 6 that they will not provide expert evidence
 7 without large fees being sought."
 8 That's something we discussed earlier about
 9 costs of --
 10 A. Yes.
 11 Q. -- of assistance.
 12 A. It certainly was an issue, yes.
 13 Q. "This will not do. If the integrity of the
 14 system is compromised then the consequences will
 15 be catastrophic for all of us including them."
 16 Just pausing there: "all of us". Were you
 17 aware at that time of general concerns within
 18 Cartwright King of the implications with the
 19 firm itself?
 20 A. I think I was aware it was a hot potato, if
 21 I could put it that way.
 22 Q. "The financial consequences of convictions and
 23 confiscation orders being overturned and
 24 confidence in the Post Office bookkeeping being
 25 restored for future prosecutions will be
 26

1 should be deployed in all cases where the
 2 Horizon system is challenged and he should be
 3 prepared to be called to reply to defence
 4 experts on a case-by-case basis."
 5 Is that something at that time that you were
 6 aware of, that there was a proposal for
 7 a generic statement to be obtained from
 8 an expert?
 9 A. I was aware that they needed to get a statement.
 10 I wasn't sure if it was supposed to be generic
 11 or not.
 12 Q. The second recommendation:
 13 "The material gathered should be monitoring
 14 and added on a case-by-case basis for
 15 disclosure. It would be sensible to have
 16 a nominated individual in charge to whom the
 17 case officers can come. There is little point
 18 in weaving a web without having a spider in it."
 19 "The material should be monitored and added
 20 on a case by case basis for disclosure"; were
 21 you aware of a central hub that was developing
 22 for disclosure purposes?
 23 A. No.
 24 Q. Third, he said this:
 25 "We should ascertain why we have decided to
 28

1 instruct Second Sight limited."

2 Just pausing there, we'll see the use of
3 "we" and "our" quite often there. At Cartwright
4 King, was it quite common to refer to "us" when
5 talking about Post Office prosecutions or was
6 there something ...

7 **A.** I'm not sure, to be honest, no.

8 **Q.** "I presume that it was not because of any doubts
9 that we had in our system. If so, we should be
10 robust in stating that is so. I presume our
11 thinking was that as we have nothing to hide, we
12 have no objection to our practices being
13 scrutinised in which case we should say so."

14 He finishes on paragraph 7 by saying:

15 "I can appreciate that the above might be
16 expensive but it will be as nothing should the
17 integrity of the Horizon System be compromised."

18 It seems from this advice that a colleague
19 of yours was seriously worried about the Horizon
20 system being undermined.

21 **A.** Mm.

22 **Q.** Was that a concern that was widely shared with
23 your small group of colleagues?

24 **A.** Sorry, in what sense?

25 **Q.** The concern set out in quite strong terms in

29

1 **Q.** I mean, in that email there's almost a sense
2 of -- sorry in the advice, there's almost
3 a sense of fear, really, for the future. Was
4 that something that was shared throughout your
5 team?

6 **A.** I'm not sure the word "fear" would be
7 appropriate: concern.

8 **Q.** Concern?

9 **A.** Yes.

10 **Q.** Concern for the Post Office, concern for
11 Cartwright King or concern for something else?

12 **A.** I don't know. Concern that the system worked.

13 **Q.** Concern that the system didn't work?

14 **A.** Or didn't work, yes, yes.

15 **Q.** Can we look at UKGI00001432. This is an email
16 about the case of *Ishaq*. I'm not going to ask
17 you in detail about that case because I think
18 you've said in your witness statement that you
19 don't really recall very much.

20 **A.** No.

21 **Q.** But this is just over a month later. It's
22 another case that's challenging the Horizon
23 system. So, when I say a month later, a month
24 after the previous case that we looked at.

25 **A.** Yes.

31

1 this advice, but irrespective of the terms, was
2 the challenge to the integrity of the Horizon
3 system something that featured quite prominently
4 amongst the team at Cartwright King?

5 **A.** Well, I would have thought so because a lot of
6 the prosecutions were based on the evidence of
7 the system.

8 **Q.** Let look briefly at another email. It's
9 POL00141396. This is an email from Andy Cash
10 passing on this advice from Harry Bowyer to
11 Jarnail Singh. It's the same day. He says:

12 "Dear Jarnail,

13 "I enclose advice from Harry Bowyer. I know
14 it will be unpalatable, but for what it may be
15 worth I share his view."

16 So you have Andy Cash and Harry Bowyer, both
17 of the views expressed in Harry Bowyer's advice.
18 Presumably that was a view that was shared
19 throughout your team?

20 **A.** Sorry, the view being?

21 **Q.** The serious concern about challenges to the
22 integrity of the Horizon system and the need to
23 rebut that as strongly as possible?

24 **A.** Well, the system was crucial to the prosecution,
25 so, yes, in that sense.

30

1 **Q.** It's in the same kind of period that the advice
2 had been written and sent on. We have there
3 an email from Martin Smith to Rachael Panter
4 copied to Andy Cash and, in relation to this
5 case, he says:

6 "The defendant's solicitor made it clear
7 that the functionality of the Horizon system
8 would be an issue. The defendant has instructed
9 them that the correct amount of money will be
10 there in the accounts somewhere and that there
11 is an error with Horizon. 'Everyone has heard
12 about the problems with Horizon!'.

13 "This is going to be another one of those
14 cases where we will have to anticipate and deal
15 with the Horizon issue and consider our
16 approach."

17 Talking to Andy Cash, he says:

18 "Andy -- I think we should draw up
19 a separate list of cases in which we anticipate
20 Horizon arguments so that we can ensure that we
21 have appropriate answers/material and agreed
22 tactics with the [Plea and Case Management
23 Hearings] the dates of which will undoubtedly
24 arrive well before the Post Office are likely to
25 have obtained any reports."

32

1 If we scroll up, please, this is an email,
 2 I think, from Andy Cash. You're an addressee of
 3 that email.
 4 **A.** Yes.
 5 **Q.** It says:
 6 "Martin, please talk to Andy and Rachael to
 7 get a list up. Please also advise Jarnail when
 8 reporting, that we have another one.
 9 "We need to consider counsel in the Bradford
 10 case as well. We can't expect HB ..."
 11 I think that's Harry Bowyer?
 12 **A.** Yes.
 13 **Q.** "... to take them all. Rachael please check
 14 available with [two other people]."
 15 Do you recall the request to get a list up?
 16 Do you recall at this period a coordination of
 17 the various cases and various Horizon
 18 challenges?
 19 **A.** A list was gathered shortly after this,
 20 I believe, yes.
 21 **Q.** Were you involved in gathering the list?
 22 **A.** No. Contributing to it, I suppose, by
 23 identifying those particular cases to Martin or
 24 Rachael.
 25 **Q.** Did you see the list once it had been compiled?

33

1 think you attended.
 2 **A.** A handful.
 3 **Q.** A handful being five or thereabouts or?
 4 **A.** Yes.
 5 **Q.** Yeah. If you look at page 3, just by way of
 6 example, we have Rhigos branch there, the third
 7 entry. It says:
 8 "Debt of £24k. Subpostmaster blaming
 9 Horizon.
 10 "Live subpostmaster and therefore internal
 11 processes need to be exhausted. Push through
 12 normal processes to see if a Horizon issue
 13 identified.
 14 "May be some challenges around the
 15 subpostmaster refusing to follow standard
 16 process (ie wants solicitor to attend meetings,
 17 etc). This is to be managed in the usual way."
 18 Was this typical of the kinds of things that
 19 were discussed in those meetings? So issues
 20 where subpostmasters had blamed the Horizon
 21 system for losses?
 22 **A.** My understanding of these conference calls was
 23 that it was supposed to raise across the
 24 business all the Horizon Issues, so that people
 25 were aware.

35

1 **A.** Yes, I've been copied into emails. I think
 2 there's a list of cases, relevant cases, yes.
 3 **Q.** Thank you. My final document on your general
 4 knowledge in the 2012/2013 period, I'm going to
 5 take you to just some minutes from a "Regular
 6 Call re horizon Issues", that's POL00083936.
 7 This is just an example. We have many
 8 different notes from what's called "Regular Call
 9 re Horizon Issues". Do you remember when those
 10 calls started happening?
 11 **A.** They were back on the advice prepared by Simon
 12 Clarke to generate some kind of meeting for
 13 information to go sideways through the business,
 14 rather than up and down, I guess.
 15 **Q.** You're there listed as the representative from
 16 Cartwright King. Is there a reason why you were
 17 chosen to take that role?
 18 **A.** So I sat in on a handful of these hearings when
 19 Martin Smith wasn't available in conference
 20 calls.
 21 **Q.** Martin Smith was the main attendee at these
 22 meetings, was he?
 23 **A.** Yes.
 24 **Q.** If we look at page 3, please, can you give us
 25 an approximation of how many of these calls you

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1 **Q.** Do you recall this particular issue at all?
 2 **A.** No.
 3 **Q.** Thank you. That can come down. Just by way of
 4 an overview, consolidating all of those
 5 documents that we've just been looking at, you
 6 started working on Post Office's cases in
 7 February or March 2012?
 8 **A.** Yes.
 9 **Q.** By March, there was liaison with Fujitsu about
 10 the *Bramwell* case?
 11 **A.** Yes.
 12 **Q.** April/May, there were references to reports on
 13 Horizon integrity that we saw?
 14 **A.** Yes.
 15 **Q.** We've seen in June 2012 the Horizon integrity
 16 report that is circulated by Rachael Panter --
 17 **A.** Yes.
 18 **Q.** -- and a body of Horizon cases that are being
 19 dealt with by your team?
 20 **A.** Yes.
 21 **Q.** In July we have the advice from Mr Bowyer and we
 22 then have, by 2013, those regular calls that you
 23 case occasionally attended?
 24 **A.** Yes.
 25 **Q.** Was concern about the Horizon system, in effect,

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1 a constant from the beginning of your time at
 2 Cartwright King to the end of your time?
 3 **A.** The end of my time in that department?
 4 **Q.** Yes.
 5 **A.** Yes.
 6 **Q.** Thank you.
 7 I'd like to move on to a different topic and
 8 that is --
 9 **SIR WYN WILLIAMS:** Mr Blake before you do that, and
 10 I may have missed it, so I apologise if I am
 11 asking for information about something that has
 12 already been given, but do we know, and when
 13 I use the word "we" I mean the Inquiry, so have
 14 any documents, for example, been received which
 15 that show who commissioned Mr Bowyer's advice in
 16 July 2012? It's in the context of the *Wylie*
 17 case, I appreciate that --
 18 **MR BLAKE:** Yes.
 19 **SIR WYN WILLIAMS:** -- but do we actually know why he
 20 was asked to write it?
 21 **MR BLAKE:** I think my answer to you will be: we'll
 22 come to you on that one.
 23 **SIR WYN WILLIAMS:** Fine. That's fine. I was just
 24 interested to see -- interested to know, if
 25 possible, why an in-house counsel had been asked

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1 **A.** Yes.
 2 **Q.** Do you recall this piece of work at all?
 3 **A.** I think I've seen it when reviewing the
 4 documents that were sent to me, yes, or
 5 reference to it.
 6 **Q.** Do you recall your involvement or receiving it
 7 at the time?
 8 **A.** Not specifically, no.
 9 **Q.** Could we turn to the first page, please, and
 10 we'll start at the bottom. Andy Cash to Jarnail
 11 Singh.
 12 "Jarnail,
 13 "Harry [I think that's Harry Bowyer] advises
 14 that the report, provided it is comprehensive,
 15 is what is needed and we now need the expert's
 16 report on it as soon as practicable in view of
 17 the current cases timetables."
 18 If we scroll up, we have a response from
 19 Jarnail Singh, you're copied in. He says:
 20 "Andy
 21 "Thinking about the choice of expert in this
 22 case. I have in the past instructed Gareth
 23 Jenkins of Fujitsu in the case of *Misra* which
 24 incidental was the only challenge on Horizon, he
 25 provided expertise in dealing with defence's

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1 to write in the terms that he ended up writing,
 2 in, so to speak.
 3 **MR BLAKE:** Mr Bolc, are you able to assist us at
 4 all.
 5 **A.** I'm afraid I can't, no.
 6 **SIR WYN WILLIAMS:** No. Okay, fine.
 7 **MR BLAKE:** Moving on to the role of an expert, and
 8 we'll see how it plays out in various case
 9 studies in due course, but can we begin by
 10 looking at POL00020489. We are now in September
 11 2012, so after the advice had been written by
 12 Mr Bowyer.
 13 Can we start on the second page, please.
 14 Thank you. There's an email from Jarnail Singh
 15 to Andy Cash and yourself and it says:
 16 "Andy/Andrew.
 17 "Please see Helen Rose disclosures final
 18 draft report on her analysis of Horizon cases.
 19 I look forward to receiving your comments
 20 before forwarding the data for an expert
 21 report."
 22 We know and we've seen advice from Helen
 23 Rose, or a report that was written by Helen
 24 Rose, a year later, June 2013, and it's
 25 a separate piece of work.

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1 boundless enquiry into the whole Horizon system.
 2 Perhaps we need to reconsider whether to
 3 instruct him as he may be viewed too close to
 4 the system but instruct somebody entirely
 5 independent? Your thoughts please and also
 6 whether you or Harry have anybody in mind."
 7 If we scroll up, we have a response from
 8 Harry Bowyer. He says:
 9 "I would have preferred somebody entirely
 10 independent but this is such a specialist area
 11 that we would be hard put to get a report in the
 12 timescale that we require -- we might open our
 13 expert up to allegations of partiality but his
 14 expertise will be unlikely to be challenged."
 15 Were you aware of the discussion about the
 16 identity of the Post Office's expert witness?
 17 **A.** The identity of the expert, sorry?
 18 **Q.** Yes. So these discussions about whether to use
 19 Gareth Jenkins, was that something -- you're
 20 certainly on this chain, you're not in the final
 21 email, but --
 22 **A.** No.
 23 **Q.** -- were you aware of discussions about, for
 24 example, Gareth Jenkins' independence?
 25 **A.** I can't recall but, yes, it's clearly an issue,

40

1 because he worked for Fujitsu.

2 **Q.** Did you understand him to be an expert witness

3 in the sense that he was subject to, for

4 example, common law duties and requirements of

5 the Criminal Procedure Rules?

6 **A.** I certainly understood him to be an expert in

7 his field. I didn't know if he'd been trained

8 as an expert witness or had any training in that

9 regard.

10 **Q.** I think in your witness statement, it's

11 paragraph 8 of your witness statement, you say:

12 "I understood that Jarnail Singh was

13 ultimately responsible for instructing Gareth

14 Jenkins."

15 What do you mean by that?

16 **A.** In terms of giving instructions to him to do

17 a piece of work, ie prepare the report.

18 **Q.** In terms of identification of his various

19 obligations to the court and duties, whose

20 responsibility did you see as that falling on?

21 **A.** Mr Singh's.

22 **Q.** In general terms, did you see the Post Office or

23 Cartwright King as being responsible for the

24 instruction of experts, irrespective of whether

25 it's Mr Jenkins or somebody else?

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1 organisations. Generally, when you instructed

2 an expert, would you use a standard template

3 explaining the role --

4 **A.** Yes.

5 **Q.** -- and duty of an expert?

6 **A.** Yes, you would, yes.

7 **Q.** Did such a template exist in the case of Post

8 Office prosecutions?

9 **A.** I don't know. Not a separate template. I don't

10 know.

11 **Q.** Did you ever see formal instructions to

12 an expert?

13 **A.** I did not.

14 **Q.** No. Did you ever question yourself as to why

15 you didn't see any instructions to an expert?

16 **A.** I didn't consider them to be that -- that part

17 of it to be my responsibility. I accept when we

18 actually got the report from Mr Jenkins it

19 didn't include those relevant paragraphs; it

20 should have done.

21 **Q.** Did you query that with anybody at the time?

22 **A.** I did not, no.

23 **Q.** Did anyone discuss that with you at the time?

24 **A.** No.

25 **Q.** Can we look at POL00141416, please. This is

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1 **A.** Again, I come back to my previous comments about

2 these lines being very blurred. Yes.

3 **Q.** Did you, at that time, have any concerns about

4 Mr Jenkins acting in that role?

5 **A.** Well, clearly, he worked for Fujitsu, so that

6 was a concern. Ultimately, that kind of thing

7 does happen. Police investigations, police

8 officers write reports on valuations in drug

9 cases. They're deemed to be experts but they're

10 still part of the police, so it does happen.

11 **Q.** Do they write reports on cases that they have

12 personal involvement in?

13 **A.** Well, they will -- yes, look at the drugs and

14 assess them regarding quality, weight and the

15 rest of it.

16 **Q.** Was that something that you had previous

17 involvement in, the instruction of an expert,

18 prior to joining the Post Office team?

19 **A.** So, yes. We would instruct experts. The case

20 management system we used would have a template

21 letter setting out all of the obligations

22 an expert would be obliged to consider.

23 **Q.** So is that -- I mean, you don't have to give the

24 name of a particular client but you mentioned

25 you worked for the RSPCA and other

42

1 an email from Harry Bowyer to Jarnail Singh.

2 You're not copied in so I don't expect you

3 necessarily to have read that at the time. But

4 I'd like to know whether you were aware either

5 of its contents or in broad terms.

6 **A.** Sure.

7 **Q.** Here he sets out what is expected from the

8 expert. He says:

9 "Hopefully Helen will confirm that the

10 Horizon system has never been successfully

11 challenged. I have yet to see any sign of any

12 experts briefed on behalf of the defence.

13 "When she has completed her exercise she

14 should prepare a summary of those cases where

15 there is a proper attack on the system rather

16 than a gripe that the system is at all (although

17 she should record those cases so that we can say

18 that they have been kept under review -- they

19 will become more numerous as it bandwagon picks

20 up speed)."

21 Just pausing there, "bandwagon", was that

22 a phrase you were familiar with?

23 **A.** I seem to recall it was a phrase used

24 repeatedly, yes.

25 **Q.** Repeatedly by who?

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1 A. I can't be specific, certainly Mr Singh.
 2 I can't say who else.
 3 Q. It then says:
 4 "The expert will need to address the report
 5 to the following issues:
 6 "1) A description of the Horizon system ...
 7 "2) A declaration that it has yet to be
 8 attacked successfully.
 9 "3) A summary of the basic attacks made on
 10 the system concentrating on any expert reports
 11 served in past cases. If there are none then
 12 state that no expert has yet been found by any
 13 defence team civil or criminal to attack the
 14 system (at the moment there seems to be little
 15 more than griping by defendants that the system
 16 must be at fault without saying how).
 17 "4) Plainly, like all accounting systems,
 18 there is room for human error (keying in wrong
 19 amounts etc) but the expert should be able to
 20 state that innocent human error is unlikely to
 21 produce the types of discrepancies of many
 22 thousands of pounds over many months."
 23 He then says:
 24 "A decent report along those lines will go
 25 a long way to putting this issue to bed."

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1 a report and it's then sent, in the middle
 2 email, from Martin Smith to William Martin,
 3 Harry Bowyer, Andy Cash, Rachael Panter. Who
 4 was William Martin?
 5 A. I don't know. He didn't work for Cartwright
 6 King, as far as I know.
 7 Q. Let's scroll up and that will hopefully assist
 8 us. So you're not on that email distribution
 9 list but, if we look at that email at the top of
 10 this page from Harry Bowyer to Martin Smith,
 11 copied to Andy Cash, he says as follows:
 12 "Martin,
 13 "At first sight this/these look like a good
 14 base upon which our reports can be based (as
 15 most our fishing expeditions they will do in
 16 their current form)."
 17 Down that email, he says:
 18 "If there is a specific challenge in a case
 19 then the statement and the report can be tweaked
 20 to cover the eventuality.
 21 "My view is that most challenges to the
 22 Horizon system should now vanish away before the
 23 trial."
 24 Were you aware of the production of
 25 a statement that could be tweaked to cover

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1 Were you aware that that was going to be
 2 forming the basis of a statement?
 3 A. No.
 4 Q. Looking at it now, how appropriate do you
 5 consider those issues and the way they're put to
 6 be?
 7 A. Sorry, it's a bit difficult to take it all in.
 8 Which -- are you --
 9 Q. For example, there seems to be a focus on
 10 litigation and how it has yet to be attacked
 11 successfully, rather than, for example, asking
 12 the expert to comment in detail about the
 13 existence of bugs, errors or defects in the
 14 system. Do you consider those topics that the
 15 expert will need to address to be the right
 16 topics, appropriate topics?
 17 A. Sorry, it's a bit difficult for me to say on the
 18 spot like that. I would have thought
 19 concentrating on the system itself would have
 20 been more appropriate.
 21 Q. Were you involved in any discussions about what
 22 the expert might put in the report?
 23 A. No.
 24 Q. Can we look at POL00096997, please. Can we
 25 start on the second page. Mr Jenkins produces

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1 various different eventualities?
 2 A. Ultimately, yes, because the statement he
 3 produced, he was then provided with the case
 4 summaries and defence statements and asked to
 5 address those issues.
 6 Q. So were you aware that it was a generic
 7 statement that would then be tweaked, as
 8 appropriate, to the particular case?
 9 A. That's how it panned out, yes.
 10 Q. Are you able to assist us with who at Cartwright
 11 King had carriage of the statement, if anybody,
 12 so who it was that, for example, put it in
 13 statement form rather than in the form that it
 14 may have been sent in?
 15 A. No, I thought that had been done by Mr Jenkins,
 16 rather than by Cartwright King.
 17 Q. Thank you very much. I'm going to come back to
 18 the generic statements in the context of those
 19 specific case studies that we're going to get to
 20 after the break.
 21 But just one last document before the break
 22 on the topic of expert evidence, and that is
 23 POL00323641. We're moving back to the *Bramwell*
 24 case. We're now in May 2012 in the *Bramwell*
 25 case, and it is an email from yourself to Steve

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1 Bradshaw. Steve Bradshaw was, I think, the
 2 Investigator in that case; is that right?
 3 **A.** I believe so, yes.
 4 **Q.** It's that substantive paragraph that I would
 5 like to ask you about, the bottom one. It says:
 6 "With regard to your statement which is in
 7 effect being treated as an expert's report about
 8 the Horizon system, the Judge has directed that
 9 you are to liaise with Mr Jenner the author of
 10 the defence report, in the usual way between
 11 experts, to identify the issues of disagreement
 12 between you. This could be done by telephone
 13 [et cetera]. The purpose would be to identify
 14 prior to trial what can be agreed and what is
 15 disputed about the Horizon system, narrowing
 16 down the issues and making evidence quick and
 17 relevant!"
 18 It seems there as though the suggestion is
 19 that his witness statement is being treated, in
 20 effect, as an expert report. Would it be
 21 possible for the person who is, in fact,
 22 investigating an offence to write a report and
 23 for it to have the status of an expert report?
 24 **A.** No, so I think when he actually served his
 25 statement he made it clear that he wasn't

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1 formal instructions to an expert at all?
 2 **A.** No.
 3 **Q.** Do you recall any conversations that you had
 4 with Mr Jenkins or others within your team about
 5 the duties of an expert?
 6 **A.** No.
 7 **MR BLAKE:** Thank you, sir. That might be
 8 an appropriate moment to take a mid-morning
 9 break, before we move on to the case studies.
 10 **SIR WYN WILLIAMS:** Yes, certainly. What time shall
 11 we resume?
 12 **MR BLAKE:** If we come back at 11.20, please.
 13 **SIR WYN WILLIAMS:** Yeah, fine.
 14 **MR BLAKE:** Thank you very much.
 15 (11.05 am)
 16 (A short break)
 17 (11.22 am)
 18 **MR BLAKE:** Thank you, sir.
 19 **SIR WYN WILLIAMS:** Yes.
 20 **MR BLAKE:** Moving on to the case study of Angela
 21 Sefton and Anne Nield.
 22 **A.** Yes.
 23 **Q.** I want to begin just by taking you to the Court
 24 of Appeal judgment in *Allen and others*, which is
 25 the case that contains their appeal. Can we

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1 an expert, but a lay witness talking about the
 2 system. In this email, I'm obviously referring
 3 to the fact that he's being asked to discuss
 4 what he says with the defence expert, in a way
 5 that would have been done by an independent
 6 expert witness.
 7 **Q.** We've spoken already about a blurring occurring
 8 in terms of who had responsibility for
 9 instructing the expert and the instructions that
 10 were provided to the expert. Was a particular
 11 witness's status also something that there was
 12 some degree of blurring?
 13 **A.** Yes, I'd agree with that.
 14 **Q.** Why do you think that was?
 15 **A.** I'm not sure. The system was obviously quite
 16 a unique one, so the only people who really
 17 understood it were the people who were involved
 18 in it, on a daily basis, either because they
 19 were developing it or were using it or
 20 investigating it.
 21 **Q.** Do you recall communications with experts being,
 22 for example, recorded in the disclosure
 23 schedule?
 24 **A.** No.
 25 **Q.** I think you say you hadn't, in fact, seen any

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1 look at POL00113343, thank you very much, and
 2 it's paragraph 23, I think it should be at
 3 page 6. The Inquiry has looked at this before,
 4 so I'll only very briefly take you through some
 5 brief facts of this case. It says there at
 6 paragraph 23 that:
 7 "... Angela Sefton and Anne Nield each
 8 pleaded guilty to one count of false accounting
 9 with which they were jointly charged. The
 10 allegation against them was in short that
 11 between 1 January 2006 and 6 January 2012 they
 12 had falsified giro deposit entries on Horizon in
 13 relation to the receipt of [£34,000] in
 14 donations made to the charity Animals In Need."
 15 Thank you very much, if we could scroll down
 16 to the bottom of that page, at paragraph 28, we
 17 see it says there that:
 18 "On 20 January 2012, Ms Sefton and Ms Nield
 19 were each interviewed. Ms Sefton said that they
 20 only ever delayed payments and had never
 21 withheld them. Animals In Need had been
 22 significantly affected because the charity had
 23 continued to use giro deposit slips which needed
 24 a date stamp rather than (as in nearly all other
 25 cases) moving to a swipe card or barcode system.

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1 She and Ms Nield did not report the losses
2 because they were 'too terrified'. It appears
3 that Ms Nield gave a broadly similar -- or at
4 least consistent -- account. She said that she
5 did not know where the shortages were coming
6 from."

7 Scrolling down, it says at 29:

8 "Both Ms Sefton and Ms Nield submitted
9 defence statements which questioned whether the
10 losses were genuine or Horizon generated."

11 Next paragraph, paragraph 30:

12 "Ms Nield repeated the disclosure request
13 with the result that [the Post Office] agreed
14 that a defence expert should be allowed to
15 attend the branch to analyse the data. [The
16 Post Office] served a witness statement by
17 Gareth Jenkins in which he maintained that there
18 was no problem with Horizon.

19 "Call logs show that some difficulties with
20 Horizon had been sporadically reported to the
21 Post Office between 2005 and 2011, other records
22 show numerous difficulties with Horizon in
23 2009."

24 It says at paragraph 32:

25 "[The Post Office] accepts that this was
53

1 unsafe.

2 Now, if I could take you to your witness
3 statement, that's WITN09670100, paragraph 11,
4 that's page 6. You introduced the case of asset
5 and Nield on page 6, paragraph 11, and you say
6 you received a Green Jacket file between
7 3 February and 1 March 2012. At the bottom of
8 that page you say:

9 "The file contained no separate instructions
10 to me, either identifying my specific role, or
11 anything else. I believed I was acting as
12 an agent for [the Post Office] in the
13 prosecution. I was not supplied by way of
14 introduction with any policy documents in
15 relation to the conduct of prosecutions by [the
16 Post Office], disclosure or anything else.
17 I was not supplied with any information in
18 relation to the Horizon system, the details of
19 any data it generated, issues relating to its
20 reliability, any relevant cases, or details
21 regarding any civil actions or otherwise."

22 Having worked on other private prosecutions,
23 not Post Office prosecutions, did you consider
24 that to be unusual?

25 A. So this case was the first private prosecution

55

1 an unexplained shortfall case and that evidence
2 from Horizon was essential to the prosecution of
3 both Ms Sefton and Ms Nield. The Post Office
4 failed to carry out a proper investigation into
5 Horizon Issues and failed to disclose full call
6 logs and other records indicating that there had
7 been problems with Horizon at the branch. In
8 addition, Mr Jenkins had informed the Post
9 Office's solicitors that he had 'no information
10 regarding complaints or investigations into
11 Horizon and it has already been established that
12 it is not possible to examine the original
13 Horizon system that was operational until 2010.
14 Similarly, I have not been presented with any
15 audit data relating to any of these cases to
16 examine'. These defects in Mr Jenkins' evidence
17 were not disclosed. Nor were two earlier,
18 relevant reports disclosed."

19 The Court of Appeal concludes in the
20 paragraph below:

21 "In these circumstances [the Post Office]
22 concludes that the prosecution of Ms Sefton and
23 of Ms Nield was unfair and an affront to
24 justice."

25 They conclude that the convictions were

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1 I'd dealt with.

2 Q. Were you expecting to receive the information
3 that you've listed there?

4 A. I was expecting to receive some kind of
5 briefing, yes.

6 Q. Did you see your role in this case as advising
7 on, for example, which lines of inquiry the Post
8 Office should pursue?

9 A. Well, the letter that was addressed from the
10 business unit asked for an analysis of the
11 sufficiency of evidence. I don't recall it
12 saying any more than that.

13 Q. Did you see your role as being involved in any
14 way in the investigation strategy, for example?

15 A. Well, the investigation part of it should be
16 left to the investigator, to some extent, but,
17 yes, I would imagine a prosecutor would assist
18 with that if he felt appropriate.

19 Q. How about meeting the Post Office's disclosure
20 obligations? Did you see your role as being
21 involved in helping meet its disclosure
22 obligations?

23 A. Ultimately, yes.

24 Q. Having received an inadequate amount of
25 information, did you say, "Where's my letter of

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1 instruction? Where are the policy documents?
 2 Please provide me with sufficient information?"
 3 **A.** No, I just tried to get on with it.
 4 **Q.** Looking back, was that the right or the wrong
 5 thing to do?
 6 **A.** That was unwise.
 7 **Q.** Can we look at POL00044013. This is the letter
 8 I think you were just talking about, 2 February
 9 2012. It's a letter from Maureen Moors in the
 10 Fraud Team or Security Team. She says there --
 11 and it's addressed to the Royal Mail Group
 12 Criminal Law Team:
 13 "The outcome of enquiries in this case are
 14 reported by Steve Bradshaw Fraud Advisor at
 15 pages 2 to 14 together with the taped interview
 16 summary ...
 17 "It is the Business Unit recommendation that
 18 prosecution should be pursued provided the
 19 evidence is sufficient to do so. Would you
 20 therefore please advise on the sufficiency of
 21 evidence in this matter."
 22 You've said in your witness statement that
 23 this immediately struck you. Why did it
 24 immediately strike you?
 25 **A.** Because there was some sense here that the

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1 subpostmaster available and hard to replace,
 2 there might be -- the Post Office might be less
 3 inclined to prosecute them, as opposed to
 4 an inner city environment where a replacement
 5 would be easily obtainable.
 6 **Q.** Who told you that?
 7 **A.** I can't recall.
 8 **Q.** So somebody told you that, whether or not a Post
 9 Office was busy or whether a postmaster was
 10 replaceable or not, fed into the prosecution
 11 decision?
 12 **A.** I believe so, yes.
 13 **Q.** Did that strike you as concerning at all?
 14 **A.** I was surprised, yes.
 15 **Q.** Did you raise it with anybody?
 16 **A.** I can't recall.
 17 **Q.** You said that Mr Singh considered the public
 18 interest test was always met whenever there were
 19 losses to the public purse that were over
 20 a certain threshold; is that correct?
 21 **A.** Yes.
 22 **Q.** Was that something that you agreed with?
 23 **A.** No, I thought the test was wider.
 24 **Q.** Did you question it?
 25 **A.** No.

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1 interests of the business were involved in the
 2 decision to prosecute.
 3 **Q.** Was this a letter that was sent to you or
 4 received by you on top of your green file or?
 5 **A.** It was just contained within the file. I came
 6 across it because it was probably on top of the
 7 documents inside.
 8 **Q.** The request, "Would you therefore please advise
 9 on the sufficiency of evidence in this matter",
 10 did you understand that to be an instruction to
 11 you or to somebody else?
 12 **A.** Well, it was addressed to the Royal Mail Group
 13 Criminal Law Team but I understood that this was
 14 now my job. So, yes, this is the sum total of
 15 my instructions.
 16 **Q.** The fact that Business Unit had recommended that
 17 prosecution should be pursued, you've said that
 18 struck you. Did you raise that with anybody?
 19 **A.** I did ask about this. I think the explanation
 20 I was given related to their service
 21 requirements for having a Post Office within
 22 a certain geographical distance of a population
 23 source or something like that. So, for example,
 24 if something awry had gone on at an isolated
 25 Scottish island where there was any one

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1 **Q.** The letter asks whether the evidence is
 2 sufficient and I think in your statement you've
 3 said that you weren't sure whether the test was
 4 one of a realistic prospect of conviction or
 5 something else. It wasn't clear to you; is that
 6 correct?
 7 **A.** Yes.
 8 **Q.** Did you, at the time, consider that this was not
 9 sufficient to properly instruct you?
 10 **A.** You could say that, yes.
 11 **Q.** Did you raise that with anybody?
 12 **A.** No, I just did the best I could and adopted the
 13 Code.
 14 **Q.** Can we please look at your advice, that's
 15 POL00057495. This is dated 1 March 2012. First
 16 paragraph, you say:
 17 "In my opinion the evidence is sufficient to
 18 afford a realistic prospect of conviction in
 19 respect of the draft charges attached. In light
 20 of their admissions in interview, the prospects
 21 of success are good."
 22 You then say:
 23 "In view of the nature of the charges, the
 24 amount involved which has not been repaid and
 25 the breach of trust aspect, this not a case

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1 suitable for a caution."

2 Prior to taking up your post involved with
3 prosecuting Post Office cases, had you ever been
4 involved in giving people cautions or the
5 provision of cautions?

6 **A.** No. As I said, this was the first case I was
7 involved in where I'd been asked to provide
8 charging evidence -- or advice, sorry.

9 **Q.** Had you ever received training in the principles
10 underlying the issuing of a caution?

11 **A.** Well, I was aware of them from a defence
12 perspective, yes, but --

13 **Q.** Had anybody in Cartwright King talked to you
14 about the matters that you would take into
15 account in order to issue a caution?

16 **A.** No.

17 **Q.** What did you understand to be the power of the
18 Post Office to issue a caution?

19 **A.** I'm not sure that I considered that.

20 **Q.** If we look at the various advices that you gave
21 in Post Office cases, will we ever see you
22 having recommended a caution?

23 **A.** I don't believe so no.

24 **Q.** The fourth paragraph says, as follows:

25 "Whilst there remains a suspicion that both

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1 **A.** Yes.

2 **Q.** You did take that into account?

3 **A.** I did.

4 **Q.** Is that set out in this advice?

5 **A.** No, it's not.

6 **Q.** We'll get to the issue of call logs but might
7 the fact that, for example, they called a help
8 line be relevant to an issue of dishonesty?

9 **A.** Potentially, yes.

10 **Q.** Is there any assessment of that issue?

11 **A.** Not in this advice, no.

12 **Q.** Do you think that this advice in itself is
13 a sufficient advice or do you think it's too
14 brief?

15 **A.** It's far too brief. As I said, it was the first
16 one that I dealt with, I believe, and I tried to
17 improve them subsequently.

18 **Q.** Were you copying a format from colleagues? Was
19 this something you'd been told to do?

20 **A.** I think I copied a format from either the
21 *Bramwell* case, or another one that I'd seen,
22 with the initial files that had been sent to me.

23 **Q.** Were you provided with any training from anybody
24 at Cartwright King as to what to do on receipt
25 of instructions from the Post Office?

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1 Sefton and Nield were involved in theft of the
2 losses concerned given their prolonged attempt
3 to cover these up, they could blame each other,
4 making individual responsibility difficult if
5 not impossible to ascertain, and at present
6 there is insufficient evidence surrounding the
7 handling of cash at a branch to rule out the
8 possibility of a third party being responsible.
9 On the other hand they have made clear
10 admissions to false accounting, admitting intent
11 to cause loss, even if only for a temporary
12 period. The prospect of them ever making good
13 the losses of course dwindled as the losses
14 increased."

15 If a third party might be responsible, how
16 did you have sufficient information to consider
17 that they had been dishonest?

18 **A.** The dishonesty arose from the method of the
19 false accounting, in the sense that they were
20 suppressing the Giro cheques, so that's what
21 I was considering.

22 **Q.** Did you take into account, for example, the
23 admissions that they made interview? Did that
24 have any effect on your assessment of whether
25 dishonesty was involved in this particular case?

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1 **A.** No.

2 **Q.** Was it effectively a baptism of fire on joining
3 that team?

4 **A.** Yes.

5 **Q.** Did you voice any concerns about that at the
6 time?

7 **A.** No.

8 **Q.** On reflection, why do you think that was?

9 **A.** I think they just assumed I should get on with
10 it.

11 **Q.** Were you overloaded with work? Were you
12 insufficiently supervised? Was there some other
13 reason why the level of work is not up to the
14 standard that you would expect?

15 **A.** Just lack of experience.

16 **Q.** Can we please look at POL00057496. These are
17 the proposed charges. Was that something that
18 you drafted?

19 **A.** I believe so.

20 **Q.** Can we please turn now to POL00166331, please.
21 It's an email from you to Steve Bradshaw, the
22 Investigator, on 3 July 2012. Thank you.

23 You say there:

24 "Andrea mentioned at the hearing that both
25 Solicitors indicated that they were intending to

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1 plead not guilty to the charges despite their
 2 apparent admissions.
 3 "I don't think that this could have anything
 4 to do with the independent Horizon review as
 5 this case relates to simple cheque suppression
 6 as opposed to any audit trail, etc."
 7 Now, the independent Horizon review, is that
 8 what we know as the Second Sight investigation?
 9 **A.** It must be, yes.
 10 **Q.** So you're there giving thought to whether the
 11 Second Sight investigation might be relevant to
 12 the issues in this particular case --
 13 **A.** That's correct.
 14 **Q.** -- and, at that stage, concluding that they
 15 weren't?
 16 **A.** Yes. The Giro credits were kept in a drawer so
 17 I assume that was outside of the system.
 18 **Q.** The comments they made interview, did they not
 19 influence your decision at organisational?
 20 **A.** They ought to have done, I couldn't see past the
 21 offence of false accounting that I had seen.
 22 **Q.** But you say that they ought to have done.
 23 **A.** With hindsight, yes.
 24 **Q.** You say there:
 25 "However in light of this indication it may
 65

1 that's page 7. I think it's over the page.
 2 Three disclosure requests;
 3 "(a) Any material that points towards other
 4 suspects ...
 5 "(b) Details of any bad character of any
 6 prosecution witness;
 7 "(c) Details of complaints and
 8 investigations into the Horizon computer
 9 system."
 10 So, within her defence statement, she has
 11 requested details of complaints and
 12 investigations into the Horizon system.
 13 We then have your response over the page,
 14 please, 28 August, and this is a response to her
 15 solicitors. You say, as follows:
 16 "On the basis of the defence statement you
 17 have provided, I have not identified any further
 18 prosecution material which is disclosable to you
 19 in accordance with the CPIA.
 20 "Specifically, in relation to the points
 21 raised in your statement:
 22 "1. There were no [known] other suspects in
 23 the case, and no material relating to the same."
 24 (2), which is details of bad character, you
 25 say, "None known".
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1 be prudent to fill any potential gaps in our
 2 case at this time and to that end a statement
 3 from Animals In Need would be useful",
 4 et cetera.
 5 I now want to move on to the defence
 6 statement, that is POL00058300, and it's page 5.
 7 This is the defence statement from Ms Nield and
 8 it says, as follows, at the bottom of the page,
 9 it says:
 10 "The defendant accepts that losses were
 11 shown on the Horizon computer system from 2005.
 12 The defendant does not know how the losses were
 13 incurred. The defendant now believes that such
 14 losses may have shown as a result of the
 15 failures of the Horizon computer system."
 16 If we scroll down to (c), about halfway down
 17 that paragraph, it says:
 18 "... this was not done with a dishonest
 19 intent or with any intention to make a gain or
 20 cause the complainant any loss. Rather, it was
 21 a desperate attempt to make good the apparent
 22 losses on the system. At no stage were Animals
 23 In Need ever deprived of the money", et cetera.
 24 We have a response from you. There are
 25 certain disclosure requests at the bottom, so
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1 (3), which was the request for details of
 2 complaints and investigations into the Horizon
 3 computer system, you say as follows:
 4 "Your client is charged with false
 5 accounting by failing to make entries on to the
 6 Horizon system, regarding the deposit slips
 7 found, and thus the offence has occurred outside
 8 of the system. Material relating to the Horizon
 9 system is therefore not deemed disclosable at
 10 this time."
 11 Do you accept now that what was going on in
 12 the system was relevant to the issue of
 13 dishonesty?
 14 **A.** Yes.
 15 **Q.** The phrase "outside of the system", was that
 16 a phrase you had heard used by others or was
 17 that your own phrase?
 18 **A.** I'm not sure. Possibly my own. I can't ...
 19 **Q.** Do you recall this decision -- the decision not
 20 to disclose information relating to the Horizon
 21 system, was that your decision or was that
 22 somebody else's decision?
 23 **A.** I'm not sure.
 24 **Q.** Why is it that you're not sure?
 25 **A.** I can't remember if I discussed that with anyone
 68

1 beforehand or not.

2 **Q.** As the solicitor with carriage of the case

3 corresponding with the solicitors for the

4 defendant and criminal prosecutions, do you see

5 yourself as responsible for the decision?

6 **A.** Yes.

7 **Q.** Yes. When you say you're not sure who made the

8 decision, was that, again, a blurring of the

9 lines or something else?

10 **A.** Potentially, yes.

11 **Q.** Were there cases that you recall where the

12 disclosure decisions that you passed on to

13 defence solicitors was a decision that had been

14 made by somebody else?

15 **A.** Yes, absolutely.

16 **Q.** In respect of material relating to the Horizon

17 system, did you ever question the responses that

18 had been provided?

19 **A.** Well, they were provided by our client,

20 essentially. So no.

21 **Q.** We've seen the Harry Bowyer advice, for example.

22 We're here in the, I think it was August 2012.

23 Do you think at that time you should have

24 thought more about the disclosability of

25 material relating to the Horizon system?

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1 complaint is the fact that the Horizon computer

2 system is to blame for these apparent losses due

3 to some form of technical malfunction."

4 Her request, at the bottom, she requests at

5 number 3:

6 "Details of any complaints made to the Post

7 Office regarding the operation of the Horizon

8 computer system from 2005 onwards, and details

9 of the steps taken to deal with those

10 complaints."

11 Over the page there's also a request in

12 relation to correspondence with Members of

13 Parliament or from Members of Parliament.

14 Can we please bring up on screen

15 POL00166335, please. If it's possible, can

16 I have alongside this document on screen

17 POL00044036 at page 2. So this is the defence

18 statement we just looked at and we have those

19 three requests at the bottom there. You are

20 contacting Steve Bradshaw, the Investigator, and

21 you say:

22 "Dear Steve,

23 "Please find enclosed defence case

24 statements served on behalf of Angela Sefton.

25 Please can you see if there is any material to

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1 **A.** Yes.

2 **Q.** Can we go to POL00044036. This is the defence

3 statement in relation to the co-accused,

4 Ms Sefton. Again, paragraph 5 of her defence

5 statement, she says:

6 "The defendant asserts that significant

7 shortages/losses had been a common experience in

8 the past. Losses started to occur from 2005.

9 The defendant had to make good a great deal of

10 those losses out of her own pocket, but as the

11 losses increased the defendant could not afford

12 to repay them from her own resources."

13 If we go over the page, please,

14 paragraph 11, it says:

15 "The defendant also prays in aid in her

16 defence the fact that the Post Office computer

17 system known as Horizon installed sometime in

18 2005 has been the subject of criticism in the

19 press. A firm of solicitors in the Midlands

20 Shoosmiths is acting on behalf of over 100

21 subpostmasters who in the past have wrongly been

22 accused of fraud and false accounting, and have

23 been compelled by the Post Office to repay

24 significant sums of money, or face criminal

25 prosecution presumably. At the heart of their

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1 disclose on points 1 and 2 raised on page 2 ..."

2 So we see there (1) is "All notes,

3 statements and other materials" concerning any

4 other suspect and (2) "All such notes,

5 statements and other materials relating to any

6 other witness", et cetera.

7 Then you say in your email on the left-hand

8 side:

9 "John Gibson has been advised of the

10 developments so far as the Second Sight review

11 is concerned."

12 Now, it doesn't look there as though you've

13 tasked Mr Bradshaw with looking into the

14 request 3, that is details of any complaints

15 made regarding the operation of the Horizon

16 system.

17 **A.** Mm.

18 **Q.** Can you assist us with why he wasn't tasked with

19 that?

20 **A.** Is it because there was a separate Disclosure

21 Officer tasked with those specific areas?

22 **Q.** That's what we'd like to know?

23 **A.** Yes.

24 **Q.** I mean John Gibson, who was he?

25 **A.** That was the prosecuting counsel in the case.

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1 Q. So he has been advised of the developments so
 2 far as Second Sight is concerned. Is that you
 3 providing Mr Gibson with advice?
 4 A. I'm not sure. I can't remember who.
 5 Q. When you refer to a second person looking into
 6 issues, are you talking about Helen Rose there?
 7 A. Yes, I believe so, yes.
 8 Q. Did you see Helen Rose as responsible for
 9 compliance with the disclosure requirements
 10 under the criminal --
 11 A. Seem to remember seeing an email from Jarnail
 12 Singh appointing her as a Disclosure Officer to
 13 do with the previous Horizon complaints.
 14 Q. I'd like now to look at a specific application
 15 for disclosure that was made in this case. Can
 16 we look back at POL00058300. Ms Nield makes
 17 an application for specific disclosure. Thank
 18 you very much. That's 13 September 2012. Can
 19 we please look at page 2. This is the
 20 application. Is says there at paragraph 4:
 21 "The defendant has sought and has been
 22 refused disclosure of the following ..."
 23 So this is what was sought by Ms Nield and
 24 what was not provided:
 25 "Details of complaints and investigations
 73

1 says:
 2 "The defence are therefore confident that
 3 the Prosecution have in their possession, or
 4 easily accessible to them, records of complaints
 5 and investigations into the Horizon system."
 6 Then the application gives the reasons for
 7 the application. First is that it goes to the
 8 issue of dishonesty. At paragraph 12, it says:
 9 "When the Jury consider whether the
 10 attribution of monies in this way by the
 11 defendant was dishonest, it is a relevant
 12 consideration whether or not the losses were
 13 'real' and whether they were attributable to
 14 her. If the losses were the result of
 15 a computer error then the Jury may well take
 16 a very different view of the defendant's mental
 17 state than they would if she had taken the
 18 money."
 19 It also, they say, goes to the issue of
 20 intent to gain or cause loss:
 21 "The second relevant issue is the question
 22 of the defendant's intention; whether she
 23 intended to make a gain for herself or cause
 24 a loss to another."
 25 Further down, they make submissions.
 75

1 into the Horizon computer system;
 2 "Access to the Horizon computer system used
 3 by the defendant ..."
 4 So if there had been a separate Disclosure
 5 Officer, it appears that, certainly at this
 6 stage, there had been no -- in fact no
 7 disclosure of details of complaints and
 8 investigations into the Horizon computer system;
 9 would you agree with that?
 10 A. Yes.
 11 Q. Could we scroll over the page, please,
 12 paragraph 8. It says as follows:
 13 "The defence are aware from articles in the
 14 press and communications from the House of
 15 Commons that the Horizon system has been the
 16 subject of much controversy over the past few
 17 years and that a significant number of
 18 subpostmasters allege that the Horizon system
 19 published incorrect losses on the system.
 20 Further, that they have in many cases been
 21 wrongly convicted of False Accounting. The
 22 issue is serious enough to have warranted the
 23 involvement of a Member of Parliament",
 24 et cetera.
 25 If we scroll down to paragraph 9, please, it
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1 Paragraph 15 says:
 2 "It is submitted that material which
 3 suggests that the Horizon system has accounting
 4 faults is therefore relevant to, and of
 5 potential assistance to, the defence for the
 6 reasons outlined and paragraphs 12-14 above."
 7 I'd like to look at the response to this.
 8 Can we please look at POL00058303. If we can go
 9 to the bottom of page 2, thank you. So we have
 10 an email there from yourself, 14 September, to
 11 Andy Cash, and you say:
 12 "Following discussion with Harry ..."
 13 So that, it seems, is Harry Bowyer; is that
 14 right?
 15 A. Yes, that's correct.
 16 Q. 14 September 2012, so we're now two months after
 17 Mr Bowyer's advice that we saw this morning:
 18 "... please see draft email to Outside
 19 Counsel in this case."
 20 Then if we look below, we have the draft
 21 email.
 22 "Dear Sir,
 23 "Please place the attached Section 8
 24 application together with the brief already held
 25 by counsel John Gibson."
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1 So that's the disclosure application that
 2 we've just seen; is that correct?
 3 **A.** Yes.
 4 **Q.** "Counsel is invited to contact instructing
 5 Solicitors to discuss the prosecution response
 6 and should be aware of the following:
 7 "1. Post Office Limited have appointed one
 8 of their Investigators, Helen Rose as Disclosure
 9 Officer dealing with Horizon challenges."
 10 That's exactly as you said a moment ago:
 11 "She has prepared a document/spreadsheet
 12 detailing all such cases past and present,
 13 approximately 20 in total, although none thus
 14 far successfully argued in court. It is felt by
 15 in-house counsel that this currently a working
 16 document and currently undisclosable as it
 17 contains some personal opinion."
 18 Now, pausing there, in-house counsel, is
 19 that Harry Bowyer or is that somebody else?
 20 **A.** It must be him.
 21 **Q.** So it's not to be disclosed because it's
 22 a working document and contains some personal
 23 opinion. Do you think that that's a fair
 24 assessment?
 25 **A.** Of what it says? Yes.

1 content of that document?
 2 **A.** Repeat the question, sorry.
 3 **Q.** Are you able to say whether a document about the
 4 Horizon system, about 20 cases, should not be
 5 disclosed because it contains some personal
 6 opinion? How is the fact that it contains
 7 personal opinion relevant or not to whether it
 8 should be disclosed?
 9 **A.** Surely that must depend on what the personal
 10 opinion was.
 11 **Q.** Can you give me an example of where personal
 12 opinion might make something not disclosable?
 13 **A.** Where the personal opinion wasn't appropriate or
 14 supported by evidence, for example.
 15 **Q.** So, if something isn't appropriate or isn't
 16 supported by evidence, it shouldn't be
 17 disclosed?
 18 **A.** Depending on what that is, yes.
 19 **Q.** Where do you get that from? Is that from
 20 a rule, a procedure, Criminal Procedure and
 21 Investigations Act, or where do I see something
 22 that might make that as a rule for disclosure?
 23 **A.** Without seeing the document, I can't say.
 24 **Q.** "2. In addition to the Second Sight review,
 25 [the Post Office] have been advised to obtain

1 **Q.** Do you think that the fact that something is
 2 a working document or contained opinion is
 3 relevant to whether it should be disclosed or
 4 not?
 5 **A.** I can't remember the content of what her report
 6 said.
 7 **Q.** How about the detail, some of the detail that
 8 was contained, that there were 20 cases and
 9 perhaps some of the detail of those 20 cases.
 10 I mean did you, for example, for yourself, look
 11 at the document that had been compiled and
 12 assess for yourself whether the information
 13 contained within it was disclosable?
 14 **A.** I can't -- I can't recall if I did or not.
 15 **Q.** Do you think you did or didn't?
 16 **A.** I can't recall.
 17 **Q.** Would you agree that that document that is
 18 referred to, or drafts of it, would be
 19 disclosable, irrespective of whether it contains
 20 personal opinion or not?
 21 **A.** Without looking at it, I can't say. I don't
 22 know the extent of the personal opinion --
 23 **Q.** Well, isn't personal opinion a bar to disclosure
 24 of a Horizon document of about 20 Horizon cases;
 25 are you able to answer that without seeing the

1 and are in the process to of doing so,
 2 an expert's report from Fujitsu UK, the Horizon
 3 system developers, confirming the system is
 4 robust."
 5 Is that what we will come to see the
 6 statement of Gareth Jenkins?
 7 **A.** Yes.
 8 **Q.** Do you think it is appropriate to tell
 9 prosecuting counsel that you are obtaining
 10 a statement from Fujitsu that confirms the
 11 system is robust?
 12 **A.** With hindsight, I can see what you're saying.
 13 It should be the other way round. It should be
 14 looking at whether the system works properly.
 15 **Q.** "3. [Post Office] maintain the system robust,
 16 but in light of adverse publicity, the view of
 17 in-house counsel is that defence should be given
 18 an opportunity to test system, should they still
 19 wish to do so, on consideration of our report."
 20 If we scroll up on the page before, we can
 21 see that you've sent the email to Jarnail Singh
 22 at the Post Office, and you say:
 23 "Please see below draft email I am proposing
 24 to send out to [counsel].
 25 "Andy Cash has asked me to seek specific

1 instruction from [the Post Office] in two
 2 issues.
 3 "1. Would we allow a defence expert direct
 4 access to Horizon system.
 5 "2. Is a 6 week timetable realistic for
 6 Fujitsu to prepare the report proposed."
 7 Can you assist us with what level of
 8 involvement Jarnail Singh had in this matter and
 9 why it is that you are contacting him?
 10 **A.** Because he, in my mind, was responsible for
 11 commissioning the report from Fujitsu in the
 12 first place and he would be able to clarify the
 13 Post Office's stance on this access to the
 14 system by a defence expert.
 15 **Q.** Can we scroll up to the first page, the bottom
 16 of the first page, please. We have a response
 17 from Jarnail Singh. He says:
 18 "1. As you may be aware in the past defence
 19 expert has attended the relevant sub post office
 20 and has been able to analysis the relevant data,
 21 etc. However this vague is very vague and
 22 general, are you able to clarify specifics.
 23 "2. Gareth Jenkins has previously provided
 24 reports in the past, he is presently on holiday
 25 for two weeks are you able to wait for his
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1 pursuant to their application for disclosure.
 2 You say, as follows:
 3 "Over the years, some post offices under
 4 investigation for losses have claimed that the
 5 Horizon system is at fault. A number of these
 6 cases have made their way through the courts but
 7 to date none have been successful.
 8 Notwithstanding this, a review of the number of
 9 cases is due to take place and details of this
 10 are attached."
 11 We'll come to see that attachment.
 12 "b. In addition to this review, it is
 13 understood that a further report from Fujitsu
 14 UK, the Horizon system developers, confirming
 15 the integrity of the system is being prepared.
 16 At present the working assumption is that it
 17 will take six weeks to prepare but the timescale
 18 may change. Defence experts have in the past
 19 attended the relevant post offices to be able to
 20 analyse the relevant data. Access to the system
 21 beyond that would need to be specified and
 22 approved by the Post Office before being
 23 allowed."
 24 Over the page we have the level of detail
 25 that is provided in respect of the challenges
 83

1 return?"
 2 The email before that, please, you say:
 3 "You are right. I will explain that defence
 4 experts have attended sub post offices in the
 5 past to analyse data, but access to the system
 6 beyond that would need to be clearly specified
 7 and approved by [the Post Office] before being
 8 allowed."
 9 Are you able to assist us with what you
 10 meant by "clearly specified"? What level of
 11 detail would they have to --
 12 **A.** I think it was in response to him saying that
 13 the request was vague and needed clarifying.
 14 **Q.** Would the Post Office ever, in your experience,
 15 provide assistance to a defendant in criminal
 16 proceedings as to what it is that they may need
 17 to show or may need to be looking at in the
 18 Horizon system?
 19 **A.** I wasn't aware of instances where defence
 20 experts had been to the Post Office before,
 21 sorry.
 22 **Q.** I'm going to now look at your letter Ms Nield's
 23 solicitors. Can we look at POL00058306, please.
 24 We're now on 18 September, and this is the
 25 information that you are providing to them
 82

1 through the courts -- sorry, over the page
 2 again. This is detail that's provided and I'm
 3 just going to read that. It says:
 4 "After a number of meetings between Post
 5 Office Management and Members of Parliament in
 6 relation to the court cases, it was agreed that
 7 the Post Office would undertake an external
 8 review of the cases which had been raised by
 9 Members' constituents. As the Post Office
 10 continues to have absolute confidence in the
 11 robustness and integrity of its Horizon system
 12 and its branch accounting processes, it has no
 13 hesitation in agreeing to an external review of
 14 these few individual cases."
 15 So this is referring to the Second Sight
 16 review, isn't it?
 17 **A.** Yes.
 18 **Q.** So it says there "a few individual cases." Were
 19 you aware of the Second Sight review involving
 20 a few individual cases?
 21 **A.** I thought there was more, yes.
 22 **Q.** Yes.
 23 "In order to provide assurance to the
 24 interested parties, it was proposed that the
 25 review be undertaken by independent Auditors,
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1 Second Sight. The review will be specifically
 2 restricted to the cases raised by the MPs as
 3 well as reviewing the accounting procedures,
 4 processes and reconciliations undertaken in
 5 relation to the cases in question", et cetera.

6 Then in the final paragraph it says:

7 "All the above is accepted based on the
 8 terms of the Review being carried out, but this
 9 is in no way an acknowledgement by the Post
 10 Office that there is an issue with Horizon.

11 Over the past ten years, many millions of branch
 12 reconciliations have been carried out with
 13 transactions and balances accurately recorded by
 14 more than 25,000 different subpostmasters and
 15 the Horizon system continues to work properly in
 16 post offices across the length and breadth of
 17 the UK. When the system has been challenged in
 18 criminal courts, it has been successfully
 19 defended."

20 Are you aware of who drafted this document?

21 A. So from the email chains I think I've seen, this
 22 was the considered response of the Post Office
 23 and was drafted in conjunction with Jarnail
 24 Singh and others above him in the hierarchy.

25 Q. Four days earlier, we have the email that we've

1 A. I beg your pardon? What kind of step?

2 Q. If you had seen a list of 20 cases involving
 3 challenges to Horizon, would that be something
 4 that was memorable or is that something that is
 5 forgettable?

6 A. I don't know.

7 Q. Can we look at POL00097138, please. Can we
 8 please start at the second page. It's an email
 9 from Rachael Panter to Gareth Jenkins. Were you
 10 working closely with Rachael Panter in relation
 11 to -- I mean, two of your cases at least are
 12 mentioned --

13 A. Yes.

14 Q. -- three cases, in fact, that we know you had
 15 involvement in, Ishaq, Sefton and Nield and
 16 Allen?

17 A. Ishaq would have been Martin Smith's case but,
 18 yes, I was aware of it.

19 Q. Were you closely involved with the work that
 20 Rachael Panter was doing in relation to those
 21 cases in which you had conduct?

22 A. Well, she assisted in obtaining the report, in
 23 that respect, yes.

24 Q. You say that she "insisted"?

25 A. Assisted, assisted.

1 seen, the discussion about a spreadsheet with 20
 2 cases challenging Horizon. Am I right in saying
 3 this is all they're getting in response to their
 4 disclosure request?

5 A. That's correct, yes.

6 Q. Yes. What is your view as to the adequacy of
 7 that response?

8 A. It's not adequate.

9 Q. How is it that an inadequate response was sent
 10 to these defendants?

11 A. It was the response that the Post Office had
 12 scripted and had asked to be sent to them.

13 Q. Do you take any personal responsibility insofar
 14 as that disclosure is concerned?

15 A. Well, I should have challenged it but it was the
 16 client's response, so we forwarded it on.

17 Q. Did you yourself look at those 20 cases that
 18 were on that list to see if there was any
 19 overlapping information that might be
 20 disclosable?

21 A. I can't recall.

22 Q. You can't recall?

23 A. I can't recall that, no.

24 Q. Would you recall having taken that kind of step
 25 in these proceedings?

1 Q. She says in the email to Gareth Jenkins:

2 "As you may already be aware, your expert
 3 report detailing the reliability of the Horizon
 4 system has been served as evidence in a number
 5 of Post Office cases that are at various stages
 6 of the court process, most of which are listed
 7 for trial in the early part of next year."

8 She says:

9 "As we already have your detailed report,
 10 I would like to serve it in each case listed
 11 below. All of the following cases have raised
 12 issues with the reliability of the Horizon
 13 system."

14 We have there the case study that we're
 15 currently talking about, Sefton and Nield.

16 The final paragraph there, she says:

17 "I would like to stress that I do not
 18 anticipate that all of the above cases will
 19 reach trial stage. Please could you read the
 20 case summaries attached and send 5 original
 21 signed and dated copies of your report to me as
 22 soon as possible."

23 Were you aware then that there was a request
 24 to Gareth Jenkins to tailor what was a generic
 25 report to those six cases, or to at least the

1 cases that you were involved in, amongst those
2 six?

3 **A.** That's what he did, ultimately, so yes.

4 **Q.** You were aware of that at the time?

5 **A.** I became aware, certainly, yes.

6 **Q.** I mean, you had conduct of the case,
7 presumably --

8 **A.** Yes.

9 **Q.** -- you played a part in that decision making?

10 **A.** Yes.

11 **Q.** Can we scroll up to page 1, please. These the
12 response from Gareth Jenkins. He says:

13 "Rachael,

14 "Can't you use the report I have already
15 send you? There is no mention of the case on
16 the report.

17 "You should really be addressing such
18 requests through Post Office Limited rather than
19 directly to myself.

20 "As far as I know there is no commercial
21 cover in place for me to spend any time on such
22 activities (and that includes [and he gives the
23 name of a case])."

24 Can you assist us, we spoke earlier about
25 financial issues, cost of assistance, was that

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1 **Q.** So she is sending, as you say, case summaries
2 and indictments in those cases to Gareth Jenkins
3 and asking him to provide a signed and dated
4 report which deals with each individual case; is
5 that correct?

6 **A.** Yes, and to comment on the -- on those
7 enclosures.

8 **Q.** She says further down this email:

9 "The remaining cases of Grant Allen, Ishaq,
10 Dixon and Sefton & Nield all require a report,
11 with the most pressing one being Grant Allen.
12 I am hopeful that I can get a form from the
13 court which will allow you to claim some of your
14 expenses for attending to give evidence,
15 although this more commonly used when acting
16 from a defence perspective, so I do not
17 anticipate receiving a considerable sum."

18 Is it fair to say that there were no
19 meaningful instructions provided to Mr Jenkins,
20 save what we can see here; certainly no formal
21 instructions?

22 **A.** That's correct, yes.

23 **Q.** Did this, at the time, raise any issues for you?

24 **A.** I'm not sure I was copied into this email, is
25 that right?

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1 something you recall at this particular time?

2 **A.** Yes, around this time, certainly.

3 **Q.** What do you recall the issue being?

4 **A.** Well, the issue of finance.

5 **Q.** Was it, for example, seen as a better use of
6 finance to tailor a generic report than to
7 commission individual reports on each occasion?

8 **A.** I see. I'm not sure if that was the purpose.

9 Potentially, yes, I can see that now.

10 **Q.** Can we please look at FUJ00156677, please. This
11 is an email on 30 November from Rachael Panter
12 to Gareth Jenkins. You are copied in on this
13 email. She says:

14 "Hello Gareth

15 "Hope you are well. Further to my previous
16 email, please can you consider the attached and
17 provide a signed and dated report which deals
18 with each individual case. I would also like to
19 update you on the developments on a couple of
20 cases."

21 Sorry, if we zoom out a little bit you can
22 see the attachment so the attachments there are
23 Dixon, Ishaq, Sefton and Nield and one other
24 case.

25 **A.** Yes.

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1 **Q.** If we scroll out, I do think you were copied
2 into that, yes.

3 **A.** I beg your pardon.

4 **Q.** Would you have --

5 **A.** Yes, I --

6 **Q.** -- seen this as a standard email sent to Gareth
7 Jenkins?

8 **A.** I'm not sure if there'd been any instructions
9 prior to this email. I wasn't sure at that
10 point.

11 **Q.** But I think you've said that you didn't see any
12 instruction at all?

13 **A.** No, I hadn't seen any.

14 **Q.** Was this typical of the kind of correspondence
15 that would go between yourselves and Gareth
16 Jenkins in respect of a request to produce
17 a witness statement?

18 **A.** Yes.

19 **Q.** Can we look at FUJ00153865, please. This is
20 an email from yourself to Rachael Panter and
21 copied to Gareth Jenkins. You say:

22 "Dear Rachael/Gareth,

23 "Please find enclosed outlines of the two
24 cases which involve me.

25 "Of the two, I would say that the Sefton and

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1 Nield case is the more urgent, and therefore
2 Gareth I would be grateful if you could
3 concentrate on that one first. It is listed for
4 trial in Jan", et cetera.

5 Again, was that a typical kind of
6 correspondence from yourself to Gareth Jenkins
7 requesting a statement?

8 **A.** Yes.

9 **Q.** Can we now move to POL00089394, please. Thank
10 you. We're now into December, 5 December, and
11 I'd like to start on page 2. If we look at
12 page 3 on this chain, we have that email we've
13 just looked at, and then there's a response from
14 Gareth Jenkins on page 2. He says as follows:

15 "My understanding from Rachael was that all
16 that is required is a signed version of
17 a standard report I produced a couple of months
18 ago (attached -- together with 2 related
19 documents). If that is the case then I can get
20 that produced, scanned and emailed to you in
21 a couple of days.

22 "However having read through the info you've
23 given me, perhaps you want me to cover some
24 further things. Some observations:

25 1 in the case of Nield and Sefton, it is
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1 of cash account. Could you clarify what this
2 means and discount it as a possible explanation
3 for the losses beginning to occur at the time in
4 the Sefton and Nield case.

5 "The audit reports will simply show the
6 money is missing, so will not take things
7 further."

8 Just pausing there, can you assist us. You
9 say "The audit reports will simply show the
10 money missing, so will not take things further";
11 why did you say that?

12 **A.** Potentially for a couple of reasons. I may have
13 been confused with the financial audit reports
14 conducted by the Investigators when they
15 attended for the audit, financial audit, as
16 opposed to what I think he is talking about,
17 which is audit data.

18 **Q.** Yes. So that's one explanation.

19 **A.** One explanation.

20 **Q.** Is there another explanation?

21 **A.** The second explanation may be that, in his
22 report, he talks about transaction logs being
23 available, and I may have come to the conclusion
24 that, simply looking at the transaction logs,
25 would simply get him back to the same point
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1 stated losses started in 2005 and this is linked
2 to the installation of Horizon. My report shows
3 that Horizon was rolled out between 1999 and
4 2002, so 2005 doesn't seem to tie in with
5 Horizon being installed. NB I have no records
6 as to exactly when Horizon was installed in any
7 branch and I don't know if Post Office Ltd have
8 any such records. Similarly I have no idea if
9 this mismatch of dates is material.

10 "2. At some point in 2010 the post office
11 would have been migrated from the original
12 Horizon system to the new Horizon Online system.
13 This is mentioned in the *Grant Allen* case but
14 not in the *Nield & Sefton* case."

15 He says at the end there:

16 "Note that I have no information regarding
17 complaints and investigations into Horizon and
18 it has already been established that it's not
19 possible to examine the original Horizon system
20 that was operational until 2010."

21 If we could scroll up, please. At the
22 bottom there you have a response from yourself
23 to Mr Jenkins, and you say:

24 "The only clarification I think I need at
25 the moment relates to the timeline, 2005 removal
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1 where the financial audit indicated that losses
2 had been incurred.

3 **Q.** Do you think you were qualified to make that
4 decision?

5 **A.** Absolutely not.

6 **Q.** Do you think you were sufficiently informed
7 about the Horizon system to make that decision?

8 **A.** I was not, no.

9 **Q.** If we look at the top email, from Gareth Jenkins
10 to yourself, he says:

11 "I have now amended my witness statement to
12 refer to the specific case and to mention the
13 removal of the cash account in 2005.

14 "Does this provide sufficient detail?"

15 He had told you in his email that he had no
16 details of the complaints or investigations into
17 Horizon, et cetera. Did you think at the time
18 that that might be something that was worth
19 including in the witness statement?

20 **A.** I think, in paragraph 3 of his reports, Horizon
21 integrity, he goes on to say that he'd been
22 involved in a number of cases personally where
23 issues had arisen. So I'm not quite sure how
24 that matches with that comment.

25 **Q.** So when you considered that statement and
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1 considered the communication between yourselves,
2 did you think to yourself "Hang on a minute,
3 these two things don't match up"?

4 **A.** Possibly, I can't recall.

5 **Q.** You possibly did think that there's an
6 inconsistency --

7 **A.** Yes, I can't recall it at the time.

8 **Q.** Pardon?

9 **A.** I can't recall at the time if I did or not.

10 **Q.** Would it not have caused you serious concern to
11 have seen such a significant inconsistency?

12 **A.** Yes, potentially.

13 **Q.** Would you not remember such a significant --

14 **A.** I can't, no.

15 **Q.** You can't remember?

16 **A.** I can't remember.

17 **Q.** In the bottom email you say:

18 "Could you clarify what this means and
19 discount it as a possible explanation for the
20 losses?"

21 Do you think it's right to have asked
22 somebody who is seen by some people as an expert
23 witness to discount something as a possible
24 explanation, rather than, for example, explore
25 it?

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1 **Q.** Could we scroll over the page, please. It says
2 in the middle of that page:

3 "I have been asked to provide a statement in
4 the case of Angela Sefton and Anne Nield.
5 I understand that the integrity of the system
6 has been questioned and this report provides
7 some general information regarding the integrity
8 of Horizon."

9 There's then a paragraph below that which
10 says:

11 "I note that in the Defence Statement there
12 is a statement that losses started in 2005 and
13 a statement that Horizon was installed at that
14 time. As I mention below, Horizon was rolled
15 out between 1999 and 2002, so I am surprised at
16 the reference to 2005. However there was
17 a significant change to Horizon that was
18 implemented late in 2005, namely the removal of
19 the weekly Cash Account report and the mover to
20 the monthly Branch Trading Report. These
21 changes were thoroughly tested at the time (as
22 is the case with any change to Horizon) and
23 there has been no indication of there being any
24 issues regarding this change. In particular the
25 changes had no impact on the overall integrity

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1 **A.** Yes, it's inappropriate, yes.

2 **Q.** The conversation reads a little like you're
3 asking Mr Jenkins to narrow his report or to
4 keep it within narrow confines. Do you think
5 that's a fair --

6 **A.** I'm not sure that's what I was attempting to do
7 but, yes, it can be read like that.

8 **Q.** What do you think you were attempting to do?

9 **A.** To explain the issue around the 2005 removal of
10 cash, cash account.

11 **Q.** Let's have a look at the witness statement that
12 was produced. It's POL00059424. Some bits are
13 a little hard to read, they're a little faint,
14 but I just want to start by looking at the first
15 paragraph. It says:

16 "I am employed by Fujitsu Services Limited
17 who have been contracted by the Post Office to
18 provide the Horizon systems operating in post
19 offices around the country. However
20 I understand that my role is to assist the court
21 rather than represent the views of my employers
22 or Post Office Limited."

23 Are you able to assist us with how that
24 final sentence came into being?

25 **A.** No, I'm not.

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1 of the system as outlined in this statement."

2 Then, if we zoom out, it goes on to talk
3 about the Horizon system in general, in general
4 terms. Am I right in saying those two
5 paragraphs that we've looked at, are those
6 effectively the tailoring of that generic
7 statement --

8 **A.** Yes.

9 **Q.** -- in this particular case?

10 Do you consider that that bottom paragraph,
11 about the Horizon system, do you consider that
12 to be expert evidence or is that Mr Jenkins'
13 personal experience of matters that he was
14 involved in? Or what did you understand or do
15 you understand that to be?

16 For example, "These changes were thoroughly
17 tested at the time (as is the case with any
18 changes to Horizon)"; is that expert evidence
19 from what you can see or is that something else?

20 **A.** I'm not sure. I'm not sure I'd be able to make
21 a determination whether that's expert evidence
22 or something else.

23 **Q.** What did you see it being at the time?

24 **A.** Expert evidence, probably.

25 **Q.** Can we please scroll down to the penultimate

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1 page. We have at the bottom "Horizon
2 Integrity". This, I think we will see in
3 another witness statement, it seems to be part
4 of the generic statement but do correct me if
5 I'm wrong on that.

6 **A.** Mm.

7 **Q.** It says:

8 "This is described in the separate integrity
9 documents ... which I now produce [and he
10 exhibits them].
11 "I have been involved personally in a number
12 of challenges to the integrity of the original
13 Horizon system and produced Witness Statements
14 for a number of cases where the integrity has
15 been challenged. I am not aware of any cases
16 where the integrity of Horizon Online has yet
17 been successfully challenged in court.
18 "The main challenges in the cases in which
19 I have been involved were presented as
20 'hypothetical issues' and my previous Witness
21 Statements went thorough each of these
22 hypotheses and showed that there was no specific
23 evidence for any of them in the data presented.
24 "In summary, I would conclude by saying that
25 I fully believe that Horizon will accurately

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1 at paragraph 12, over the page, request 12, they
2 ask for:
3 "The set of system issues recorded for
4 consideration by Fujitsu during the tenure of
5 our Client across the Horizon system and those
6 systems it interfaces to, together with those
7 systems issues unresolved at the commencement of
8 our Client's tenure."

9 Are you aware of anything in this case being
10 disclosed to the defendants relating to issues
11 with the Horizon system along those lines over
12 and above what we've seen?

13 **A.** No.

14 **Q.** I'm going to move on now to the Grant Allen case
15 study.

16 Sir, I wonder whether -- I can continue
17 until 1.00 today, or we could take another break
18 and it might be possible that we continue
19 through the lunch period. I am in your hands.
20 We will certainly finish by 3.00. We can either
21 do it by me continuing for half an hour now and
22 taking a lunch, or we can take a slightly longer
23 break now instead of lunch.

24 **SIR WYN WILLIAMS:** Let's canvass what the people in
25 the room with you, Mr Blake, what they'd prefer?

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1 record all data that is submitted to it and
2 correctly account for it. However it cannot
3 compensate for any data that is incorrectly
4 input into it as a result of human error, lack
5 of training or fraud (and nor can any other
6 system)."

7 Those final bits sound very much like the
8 requirements that we saw from Mr Bowyer earlier
9 on of the things that he said he would like to
10 be included in a witness statement. Are you
11 aware of how these paragraphs came to feature?

12 **A.** I'm not no, no.

13 **Q.** Can we please look at POL00323672. We're now in
14 2013, April 2013, and there's a disclosure
15 request.

16 "Dear Steve,

17 "Please see attached request received today.

18 As discussed please could you indicate
19 a timescale, cost for dealing with these queries
20 so Mr Gibson can consider the position ..."

21 I'll very briefly just take you to the
22 request itself, that's POL00323673. This is yet
23 another disclosure request in this particular
24 case. The solicitors for Ms Nield are asking
25 for a number of different things and, if we look

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1 I'm really essentially neutral about it but, if
2 the consensus is that we should have less than
3 a full lunch break but a reasonable break now,
4 and then forego a lunch break, if that's the
5 consensus, I'm happy with that.

6 **MR BLAKE:** There may be quite a few questions,
7 actually, on behalf of Mr Jenkins, so perhaps
8 we'll continue going now.

9 **SIR WYN WILLIAMS:** All right, fine.

10 **MR BLAKE:** Thank you.

11 The case of Mr Allen. I'd like to very
12 briefly take you through the case summary.

13 **A.** Yes.

14 **Q.** It's at RLIT0000039. Can we go, please, to
15 page 4, and it starts at paragraph 16. I'm
16 going to very briefly summarise this because, as
17 I say, those in this room have seen these case
18 studies on a few occasions:

19 "On 24 January 2013, in the Crown Court at
20 Chester ... Mr Allen pleaded guilty to a single
21 count of fraud ... [He] entered a guilty plea on
22 a basis (accepted by [the Post Office] and the
23 court) that he could not account for the loss
24 but admitted covering it up. He was sentenced
25 to a 12-month community order."

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1 If we look over the page very briefly, I'll
2 just take you through a few brief paragraphs.
3 Paragraph 18, halfway down, it says:
4 "He described inexplicable small losses as
5 well as some large losses which had been
6 attributed to one member of staff. He denied
7 that he had stolen any money. He expressed
8 a willingness to repay the losses but disputed
9 that the sums represented actual loss to [Post
10 Office] and maintained that they had been caused
11 by issues with the system."

12 Next paragraph.

13 "A number of logs retained by the Post
14 Office demonstrate that Mr Allen reported the
15 relocation problems and his concerns about
16 faults with Horizon."

17 Next paragraph, please:

18 "During the course of criminal proceedings,
19 on 2 November 2012, Mr Allen's solicitors
20 requested disclosure of an independent review of
21 the Horizon system."

22 So here we get into the Second Sight issue.

23 A. Yes.

24 Q. "[Post Office's] agents, Cartwright King,
25 responded by indicating that the review was

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1 plea, Mr Allen's conviction is unsafe."

2 Your involvement in this case, I think,
3 began in May and June 2012; is that correct?

4 A. Yes, I believe so.

5 Q. Can we look at POL00089426. This is the
6 investigation report produced by Mr Bradshaw; is
7 that right?

8 A. Yes.

9 Q. Yes. Is this the kind of document that you
10 would receive in your green pack?

11 A. Yes.

12 Q. Yes. Just pausing there, do you have any view
13 as to the abilities of Mr Bradshaw?

14 A. There was a consistent failure to investigate
15 the losses properly in relation to the cases
16 that I dealt with with him.

17 Q. Was that a feeling you held at the time or is
18 that a subsequent feeling?

19 A. Subsequently.

20 Q. At the time, did you think that he was
21 thoroughly investigating those cases that you
22 were involved in?

23 A. Not in relation to the Grant Allen case when
24 I had a communication from Mr Jenkins indicating
25 that he would be able to delve more deeply into

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1 still pending. Cartwright King stated that, on
2 receipt of the report, the Post Office would
3 consider their continuing duty of disclosure and
4 provide a copy if appropriate."

5 The next paragraph says:

6 "[The Post Office] served a witness
7 statement from Gareth Jenkins ..."

8 It says this, about halfway down that
9 paragraph:

10 "Mr Jenkins made clear that he had not seen
11 detailed logs to see whether Horizon could be
12 responsible for the losses at Mr Allen's branch.
13 He concluded that Horizon 'will accurately
14 record all data that is submitted to it and
15 correctly asked for it'. Correspondence between
16 Cartwright King and Mr Jenkins indicates that
17 Cartwright King instructed Mr Jenkins not to
18 analyse the detailed logs, in order to avoid
19 incurring additional costs."

20 Then over the page:

21 "[The Post Office] accepts that the
22 prosecution was unfair and an affront to justice
23 and the Court of Appeal says POL is right to do
24 so.

25 "In our judgment, notwithstanding his guilty
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1 the issue about the data loss, and I had
2 previously instructed, in my advice, for
3 enquiries to be made into that precise issue and
4 it clearly hadn't been.

5 Q. So, in your view, Mr Bradshaw hadn't carried out
6 an instruction to --

7 A. An advice.

8 Q. An advice to what, to look at particular logs?

9 A. I believe the advice is in the papers somewhere,
10 if you could bring that up, then it will help
11 with --

12 Q. We will have a look at it shortly.

13 A. Yes.

14 Q. But is your view that that investigation was
15 insufficient in some way --

16 A. Yes.

17 Q. -- because of a lack of thoroughness?

18 A. Yes.

19 Q. That was something that you had advised on at
20 an early stage of the prosecution?

21 A. Yes, I'd asked them to look into this issue.

22 Q. Was it seen as important to you at the time?

23 A. Yes.

24 Q. Can we please look at the bottom of page 3.

25 This is the interview with Mr Allen. This

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1 summarised by Mr Bradshaw. It says:
 2 "Mr Allen said that between the period of
 3 November 2009 and March 2010 he had to make good
 4 losses in the region of £1,400 and this ... can
 5 be seen in his business accounts."

6 If we go over the page, please. If we could
 7 highlight the top 3 paragraphs, it says:

8 "Mr Allen explained that during the period
 9 of March 2010 and April 2010 there was
 10 a discrepancy in the accounts of £3,000, he said
 11 that he had checked all the paperwork but could
 12 find no explanation for this discrepancy. He
 13 then made admissions that this £3,000 was never
 14 made good and had been rolled over from each
 15 Branch Trading Period until the next audit took
 16 place ...

17 "Mr Allen's explanation for this discrepancy
 18 was that due to the relocation of the branch the
 19 Horizon system was not communicating,
 20 (ie polling) and the data on the Horizon system
 21 was not being sent.

22 "Mr Allen also explained that for each
 23 subsequent Branch Trading Period, unless the
 24 discrepancy in the accounts was small ... the
 25 discrepancy was added on to the original £3,000
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1 sufficiency of evidence?

2 **A.** Yes, because it -- I mean, it says there "Please
 3 see attached charging advice for further
 4 information", yes.

5 **Q.** Yes, so there is, attached to this,
 6 a substantive advice that we're going to come
 7 to.

8 **A.** Yes.

9 **Q.** Can we, before we look at that, look at
 10 POL00089455, please. This is a draft of the
 11 proposed charge. Was that drafted by you?

12 **A.** Yes.

13 **Q.** Now we'll look at the separate charging advice,
 14 POL00089057. Can you assist us with why, in
 15 this case, there was charging advice but in the
 16 previous case study that we saw, there wasn't?

17 **A.** As I said, as I took on more of these advices,
 18 I developed my approach.

19 **Q.** So this is you gaining experience on the job?

20 **A.** Yes, yes.

21 **Q.** You refer there to the prosecution case. In the
 22 audit, paragraph 2, you say that he admitted
 23 that his stock would be short:

24 "He hoped for an 'overscale' payment to ...
 25 make good the shortages", et cetera.
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1 discrepancy ..."

2 It seems as though he gives quite
 3 a straightforward explanation or description of
 4 the problem with Horizon in interview; would you
 5 agree with that?

6 **A.** Absolutely, yes, he had what he believed to be
 7 a data loss issue during his installation
 8 process.

9 **Q.** Certainly, your initial advice is at
 10 POL00089454. Having read that investigation
 11 report, you then give what is a very brief
 12 advice that says:

13 "In my opinion the evidence is sufficient to
 14 afford a realistic prospect of conviction. The
 15 draft charge is attached. In light of his
 16 admissions in interview, the prospects of
 17 success are good.

18 "In view of the nature of the charge, amount
 19 involved and breach of trust element, this is
 20 not a case suitable for a caution."

21 We've dealt with cautions already.

22 **A.** Yes.

23 **Q.** Then it goes on to talk about mode of trial but
 24 would you accept that this is even briefer than
 25 the advice that we saw before, in respect of the
 110

1 If we go over the page, there's reference to
 2 the interview. If we look at, say,
 3 paragraph 4(iii):

4 "In the first 4 weeks there were wiring
 5 problems with the terminals, which he believed
 6 meant Horizon was not sending out (polling)
 7 data."

8 So this is his account in interview. He
 9 says at (iv) that:

10 "In that period a £3,000 discrepancy arose
 11 in the accounts which could not otherwise be
 12 explained.

13 "(v) He never made good the loss believing
 14 a transaction correction would resolve the issue
 15 in due course.

16 "(vi) In each subsequent balancing period,
 17 anything other than insignificant discrepancies
 18 of £50 or less were added on to the original
 19 £3,000 loss.

20 "(vii) All such discrepancies were
 21 transferred across to his stock unit

22 "(viii) He inflated the cash-on-hand to
 23 achieve a balance ..."

24 Then (ix), it says:

25 "When cash was checked independently during
 112

1 migration to Horizon Online in 2010 he
2 reintroduced cash already counted into his stock
3 unit to make it balance."
4 Then you say at paragraph 5:
5 "Enquiries conducted subsequently confirmed:
6 "The non-pollled report following the branch
7 relocation showed that an engineer attended on
8 16 and 17 March 2010 to complete a base unit
9 build and that BT fixed a fault. However as of
10 17 March 2010 the number of days not polled is
11 shown as 12."

12 It certainly shows there is some consistency
13 between his in interview and the facts here.

14 **A.** Yes.

15 **Q.** There were at least 12 non-pollled days?

16 **A.** Yes.

17 **Q.** "The Branch Confirmation Team has not been
18 contacted in relation to the £3,000 discrepancy.

19 "No calls were made to [what we know as the
20 NBSC]."

21 You reference to the defence case and you
22 say:

23 "The only avenue open to him to defend
24 either of these potential charges then would be
25 to deny that he had the necessary *mens rea*,

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1 **Q.** -- rather than a statement investigating
2 something?

3 **A.** No.

4 **Q.** Do you accept now, looking at it, it would have
5 been better to have said --

6 **A.** Yes.

7 **Q.** -- "Investigate the non-polling", rather than,
8 "Please give us a statement" --

9 **A.** Absolutely, yes.

10 **Q.** -- "that explains why it doesn't prove the
11 defendant's case".

12 One thing this advice doesn't address is
13 disclosure. Did you advise on disclosure? Did
14 you provide written advice on disclosure?

15 **A.** No, no.

16 **Q.** Whose job did you consider it to be to consider
17 the implications for disclosure in respect of
18 this?

19 **A.** Again, I'm not sure whose responsibility that
20 should have been.

21 **Q.** Can we please look at FUJ00153881. If we could
22 start on the third page, please. It's
23 correspondence between yourself and Gareth
24 Jenkins. You say there:

25 "I attach an extract from Mr Allen's

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1 ie to say that he had not done so dishonestly."

2 You then give advice on the statements.

3 Could we scroll over the page, please. You say
4 this, you say:

5 "With regard to the non-pollled report,
6 a separate statement will be required explaining
7 in layman's terms, why this does not show the
8 data could have been lost during the 12 day
9 period identified thus generating the £3,000
10 loss as claimed by the defendant."

11 You then say:

12 "Subject to a satisfactory answer to the
13 above query about the possibility of lost data
14 then I would advise that a charge of fraud by
15 false representation would suit the
16 circumstances ..."

17 So it seems as though what you're asking for
18 in the paragraph above is a statement to show
19 why it doesn't show that the data could have
20 been lost. Were you aware of any basis for
21 saying that it couldn't have been lost, as in
22 similar problems to the ones we've identified
23 above, it seems as though what's being sought is
24 a statement confirming something --

25 **A.** Yes, absolutely --

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1 interview. As in the case summary I sent you,
2 he is trying to suggest that an initial loss of
3 £3,000 is attributable to lost data which has
4 not reached Head Office because of installation
5 problems. Are you able to comment on this
6 scenario at all? Ultimately we would need to
7 discredit this as an explanation that holds any
8 water. He denies stealing the subsequent losses
9 and therefore by implication may be seeking to
10 blame the system for these losses as well."

11 Do you think it was appropriate to say to
12 an expert witness --

13 **A.** No.

14 **Q.** -- that they needed to discredit an explanation?

15 **A.** No.

16 **Q.** Why did you think this was happening over and
17 over again?

18 **A.** I think it was an approach that had been adopted
19 that I'd seen in other documentation and used
20 the same approach, and it wasn't right.

21 **Q.** Was it a particular culture at Cartwright King
22 or was it something else?

23 **A.** I can't say.

24 **Q.** You said you adopted it from documentation. Do
25 you mean documentation from the Post Office,

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1 from Cartwright King or from somewhere else?

2 **A.** Well, even if you go back to the very first
3 email from the other solicitors, Stone King or
4 something, it's a similar approach right there
5 from the outset, isn't it?

6 **Q.** Can we please look at the second page and
7 there's a response from Gareth Jenkins.

8 Mr Jenkins says, as follows, and I think it --
9 I'm sorry, I have read out quite a lot this
10 morning but I'm going to read out a bit more.
11 I'm going to read out the contents of this
12 email. It says:

13 "I've had a look at the statement here and
14 I think it might be helpful to have a dig as to
15 exactly what went on in the branch at the time
16 of the initial loss. I think I understand what
17 he is claiming. However where there are comms
18 problems it is normal to recover any missing
19 data once the comms are sorted out (provided it
20 is within 35 days), so this shouldn't be
21 a reason for a loss. Also there are processes
22 in place to retrieve outstanding data where
23 there are extended comms issues lasting more
24 than 7 days ...

25 "I could just make a general statement
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1 **A.** Indeed, yes, yes.

2 **Q.** I think you said that it was important, you saw
3 it as sufficiently important to put in that
4 advice?

5 **A.** It was a clear, reasonable line of inquiry.

6 **Q.** If we turn to the first page, at the bottom of
7 the page, we have your response. It's an hour
8 later: 12.50, we're now at 1.54. You say:

9 "Thank you for considering the position so
10 promptly. I can now confirm that the case has
11 been put back ... I would appreciate if you
12 could add your general comments at this stage
13 regarding the safeguards in place for comms
14 problems to your statement, and send this to me
15 as before and I will refer back to the Post
16 Office to consider whether we go on to request
17 the retrieval of data for your further analysis.
18 I say so on the assumption that the data is
19 available for 7 years. An idea of what 2 days'
20 analysis would cost would assist in that
21 decision. With regard to Helpdesk calls I also
22 assume this is freely available to POL and
23 therefore would request that enquiry is carried
24 out. I attach the Horizon non-polling report
25 obtained by the Investigator in this case
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1 relating to that or if we retrieved the data

2 from that time I could check out exactly what
3 happened in this case."

4 He says:

5 "I have checked with Penny in our
6 prosecution support team and Post Office Limited
7 have not requested any data relating to this
8 case (she's checked back as far as April 2010),
9 nor have we been asked about Helpdesk calls
10 (which would probably have occurred if there
11 were comms issues).

12 "Is it worth asking Post Office Limited to
13 request such data for me to examine before
14 putting together a specific statement for this,
15 or is a simple generic one sufficient?"

16 "Note that data retrieval is part of the
17 standard service that Fujitsu provides but any
18 time I spend on examining the data, say a couple
19 of days, would be chargeable so there are
20 commercial considerations for you or Post Office
21 to consider."

22 Now, it seems there from his response that
23 the advice that you pointed us to earlier, as
24 suggesting that investigation should be carried
25 out, has not, in fact, been carried out.
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1 previously."

2 Mr Jenkins responds above, six minutes
3 later, 2.00, he says:

4 "Okay, I will put together some general
5 comments later this week.

6 "A look at the non-pollled report shows that
7 the branch was offline for 12 days ..."

8 So, again, confirming something that was
9 said in the defence.

10 **A.** Yes.

11 **Q.** "... assuming it was okay after the last entry.

12 "The data should have been fully recovered
13 assuming base units were swapped correctly and
14 I'll cover that in what I say.

15 "Yes, data up to 7 years is freely
16 available", and he gives you the cost.

17 So we have unexplained shortfalls or
18 discrepancies critical to the defence in this
19 case, clearly raised in interview. Mr Jenkins
20 has flag that analysis of non-polling incidents
21 would be useful. You responded, you raised
22 possible cost concerns, and that you would ask
23 the Post Office.

24 **A.** Yes, there'd been an email from Mr Singh, not
25 directly sent to me but to Cartwright King,
120

1 about getting authorisation for any costs before
 2 they were incurred.
 3 **Q.** Did you, in this particular case, make enquiries
 4 about the cost or did you dismiss it?
 5 **A.** Sorry, in this case?
 6 **Q.** Yes. So we're talking about a particular case,
 7 Grant Allen, and we have Mr Jenkins saying he
 8 can carry out an analysis for you?
 9 **A.** Yes, I have gone back to the Investigator,
 10 Mr Bradshaw, about that.
 11 **Q.** Can you assist us with that correspondence?
 12 **A.** There's an email. If you could bring it up then
 13 it will assist me, yes.
 14 **Q.** Let's have a look at POL00089380, please. Is
 15 this the email chain that you're referring to?
 16 **A.** Yes, it is.
 17 **Q.** Yes. Is it on the first page, is it the email
 18 of 12 December, 12.54 that you're referring to?
 19 **A.** 12.54, that's the email from Mr Jenkins.
 20 **Q.** Yes.
 21 **A.** Then, subsequent to that, I think I've forwarded
 22 it to Mr Bradshaw, the email above.
 23 **Q.** Okay, so we have here an email from Gareth
 24 Jenkins in the middle saying, "Sorry for the
 25 delay". He's amended the statement to cover the
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1 would be chargeable to the post office at
 2 approximately £2,500. I have told him that at
 3 present we do not wish to pursue this option
 4 unless it became unavoidable. Can you let me
 5 know your thoughts before I get him to sign it
 6 off?"
 7 Now, it doesn't look very much as though
 8 you're open to that possibility, does it, in
 9 that email? That's "I have told him we don't
 10 wish to pursue it unless it's unavoidable", is
 11 that on instructions or --
 12 **A.** Yeah, I've had to look very hard at this email
 13 to try to understand what I was meaning. I've
 14 said, "I had asked him to look at the
 15 non-polling issue raised interview. I believe
 16 that he had dealt with it adequately for our
 17 purposes".
 18 I'm not sure that that's correct. It was
 19 still inadequate because he's saying that there
 20 still might be some issue because of the
 21 installation. So, although he said, in theory,
 22 the data should have polled once it was
 23 reconnected, he is saying that might not be the
 24 case because of installation and the process of
 25 that reinstallation.
 123

1 specific case of Grant Allen, so it looks as
 2 though he's put in --
 3 **A.** The issue --
 4 **Q.** -- a couple of paragraphs into the generic
 5 statement?
 6 **A.** Yes.
 7 **Q.** "Is that sufficient for you at this stage or do
 8 I need to cover anything else? When you confirm
 9 it is all complete I can arrange to get it
 10 signed and sent to you as before."
 11 Then we have your email to Steve Bradshaw.
 12 You say as follows:
 13 "Please see the attached report from Gareth
 14 regarding this case which I propose to serve on
 15 the defence. I had asked him to look at the
 16 non-polling issue raised in Mr Allen's interview
 17 and I believe that he had dealt with it
 18 adequately for our purposes. Gareth tells me
 19 that it is in fact possible for him to retrieve
 20 the actual data from this time to see what
 21 actually occurred at this branch and that the
 22 retrieval of data is free to the Post Office.
 23 However he estimates that it will take
 24 approximately two and a half days for him to
 25 look at it and analyse what it means and this
 122

1 And then I've gone to say:
 2 "Gareth tells me that it is in fact possible
 3 for him to retrieve the actual data at this time
 4 to see what actually occurred."
 5 I think at this point I'm becoming
 6 exasperated with him because I've understood now
 7 that he hasn't done this and, clearly, this is
 8 something that was possible and should have been
 9 done. And then I think I've lost my temper with
 10 him and said "I have told him at present we do
 11 not wish to pursue this option unless it becomes
 12 unavoidable", in the sense of is this how we're
 13 really approaching this, we don't want to do
 14 anything unless we have to?
 15 "Can you let me know your thoughts before we
 16 get him to sign it."
 17 I think it has become an angry email.
 18 **Q.** So your reading of this email is that you were
 19 angrily, effectively, telling off Mr Bradshaw
 20 for not doing enough?
 21 **A.** It's the only way that it makes sense because
 22 here I'm asking him to look at it: we can do
 23 this, there's actual data, see what actually
 24 occurred, imploring him to do that and then
 25 saying, "Actually don't bother, unless it's
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1 unavoidable".

2 It's kind of -- it's conflicting.

3 **Q.** Can I suggest to you another interpretation to
4 consider. You say, for example, "I believe that
5 he had dealt with it adequately for our
6 purposes". That's --

7 **A.** Well, I say --

8 **Q.** -- present tense --

9 **A.** I say "adequate" because in the sense that, in
10 theory, he's addressed the issue but he's still
11 left open the possibility of data loss having
12 occurred because of the incorrect reinstallation
13 of the equipment.

14 **Q.** You then say "Gareth tells me it's in fact
15 possible to get it but it's going to cost this
16 much, and I've told him at present that we don't
17 wish to pursue this option unless it becomes
18 unavoidable", as in "I don't think it's sensible
19 at the present time, and we'll any do so if it
20 becomes unavoidable".

21 That seems to be something that you have
22 said to Gareth Jenkins. It doesn't, it may be
23 suggested, read like somebody who is frustrated
24 at Mr Bradshaw. It reads, perhaps, it might be
25 said, to be --

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1 1.50.

2 I think that's a yes. I'll take that as

3 a yes. 1.50, please.

4 **SIR WYN WILLIAMS:** 1.50, all right.

5 (12.57 pm)

6 (The Short Adjournment)

7 (1.50 pm)

8 **MR BLAKE:** Good afternoon, sir, can you see and hear
9 me?

10 **SIR WYN WILLIAMS:** Yes, thank you.

11 **MR BLAKE:** Thank you very much. Could we look at
12 POL00323665. It's the same email as we were
13 looking at just before the break but this one
14 just has a little more information on screen.

15 Do you recall we were looking at this
16 document and I think you were suggesting that it
17 was Mr Bradshaw rather than yourself who was
18 effectively pushing not to carry out more
19 investigations; is that correct?

20 **A.** I'm not suggesting he was pushing not to. No.

21 **Q.** No? What are you suggesting?

22 **A.** Sorry, in what respect?

23 **Q.** Well, let's have a look. So we're Wednesday
24 12 December, 2.12 pm. We then have the document
25 you mentioned just before lunch, FUJ00153884.

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1 **A.** It's not clear, I agree.

2 **Q.** Well, it may be said that it is, in fact, clear
3 and that it is clearly telling Mr Bradshaw that
4 you had told Mr Jenkins that it was not required
5 at present and would only be required if it
6 became unavoidable.

7 **A.** I think if you look at the later email, where
8 I respond to Gareth -- Mr Jenkins -- and say
9 "the Investigator is happy with the report", the
10 choice of the word "Investigator" perhaps wasn't
11 accidental and was rather in an ironic sense:
12 the Investigator, who is supposed to be doing
13 this, isn't investigating.

14 **Q.** So you think there's another email that suggests
15 that the Investigator is happy and that, in some
16 way, there is a hidden meaning to it?

17 **A.** Yes, I think so.

18 **Q.** Perhaps we'll look at that email after the lunch
19 break?

20 Sir, might that be an appropriate point at
21 which to take a lunch break?

22 **SIR WYN WILLIAMS:** Yes, certainly. So what time
23 shall we resume?

24 **MR BLAKE:** I'm just going to make it a quick -- if
25 I can be allowed by the transcriber I would say

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1 **A.** Yes.

2 **Q.** I think this is the email that you were
3 referring to. It is an email from yourself to
4 Gareth Jenkins --

5 **A.** Yes.

6 **Q.** -- not very long after, 3.29. So an hour later.

7 **A.** Yes.

8 **Q.** Saying:

9 "Dear Gareth,

10 "The Investigator is happy with the report
11 as it stands. Please can you proceed as before.
12 "Many thanks."

13 Now, I think you said that "the
14 Investigator" was said in an ironic sense.

15 **A.** Yes.

16 **Q.** How are we to read that email?

17 **A.** That I'm displeased with him because he hasn't
18 carried out his investigations.

19 **Q.** How are you showing in that email that you were
20 displeased with Mr Bradshaw?

21 **A.** I'm -- instead of just saying "POL are happy",
22 I'm using the word "Investigator" specifically,
23 I think, because I'm not happy with the way that
24 he's carried out that role.

25 **Q.** Do you think that a reasonable person, reading

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1 that email, would infer that you --

2 **A.** No.

3 **Q.** -- were displeased with the Investigator?

4 **A.** No.

5 **Q.** So is it just something that you yourself would
6 have known?

7 **A.** Yes.

8 **Q.** I mean, isn't it entirely consistent with the
9 suggestion that you made to the Investigator in
10 the previous email?

11 **A.** Also, yes.

12 **Q.** Can we look, please, at POL00089374. I think
13 this is another email that you were referring to
14 before the break and it's an email from Jarnail
15 Singh about cost. So he says in an email to
16 Rachael Panter:

17 "The cost of obtaining data, statements is
18 very expensive which simply results from Post
19 Office's contractual obligations to Fujitsu and
20 also legal, compliance and budgetary obligations
21 puts further restraints on obtaining such data
22 from Fujitsu. Therefore it is very important
23 due process is strictly followed. I need to be
24 notified if anything is required from Fujitsu."

25 I think that's the email you were referring
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1 the statement from Mr Jenkins in the *Allen* case.
2 Paragraph 1 again, same as the previous
3 statement we looked at, and it's over the page,
4 please, that we get to the specific part about
5 Mr Allen's case. He says:

6 "I have been asked to provide a statement in
7 the case of Grant Allen."

8 So similar form of words to the previous
9 case, just now reflecting the specifics of this
10 case study.

11 "I understand that the integrity of the
12 system has been questioned and this report
13 provides some general information regarding the
14 integrity of Horizon.

15 "I note that in the Summary of Facts, it is
16 stated that during the period of relocation in
17 March 2010 that Mr Allen believed that a £3,000
18 discrepancy was due to Horizon not sending out
19 data (non-polling). I have been shown extracts
20 from the Horizon non-poll reports for the
21 period in March which shows that the Winsford
22 Branch was included in this report for 12 days
23 up and to including 17 March. This in itself is
24 usual as if a branch appears to be non-poll
25 report for more than a few days, an attempt is
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1 to before.

2 **A.** It is.

3 **Q.** Was there anything -- I mean, this is in
4 November, so this isn't in the particular
5 context of that particular discussion that you
6 were having with Gareth Jenkins. Is there
7 anything over and above that that led you to
8 believe that the Post Office didn't want to
9 obtain the data?

10 **A.** No, it was simply Mr Bradshaw's inactivity in
11 getting it.

12 **Q.** One of the things that Mr Jenkins said that you
13 could obtain is the data itself, he said it was
14 free, but it's his time analysing it that costs
15 money.

16 **A.** Yes.

17 **Q.** Did you consider obtaining the data itself?

18 **A.** I think I did and I think I thought that,
19 without his analysis, it wouldn't be worth much.

20 **Q.** What about to the defendant? Might it be worth
21 something to the defendant to have the raw data?

22 **A.** Yes, absolutely. I agree with you.

23 **Q.** Do you think that was another mistake?

24 **A.** Yes.

25 **Q.** Can we please look at FUJ00124200 and this is
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1 made to retrieve the data by other means than
2 before day 10. (I have no knowledge as to
3 whether this occurred in this case or not.)"

4 Just pausing there, is that something that
5 an enquiry could have been made into?

6 **A.** Sorry, repeat that?

7 **Q.** Where he says, "I have no knowledge as to
8 whether this occurred in this case or not", he
9 may have no knowledge but do you think that
10 an Investigator could have been tasked or he
11 could have been tasked to make further enquiries
12 within Fujitsu as to whether any attempts were
13 made to retrieve data?

14 **A.** Yes, it could have been, yes.

15 **Q.** "This in itself is unusual ..."

16 Again, do you see this as expert evidence or
17 speaking from his own personal knowledge of his
18 own company's processes?

19 **A.** Probably both, is it?

20 **Q.** Then he says:

21 "This confirms the fact that there were
22 indeed communications issues between Horizon and
23 the data centre at this time. However it should
24 have no impact on data recorded locally within
25 the branch provided all operational processes
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1 were followed correctly."

2 **A.** That's the caveat, isn't it?

3 **Q.** Absolutely. So, had he looked at the data, he
4 may have been in a better position to say, one
5 way or another; would you agree with that?

6 **A.** Yes.

7 **Q.** "Also, once communications were restored, all
8 historical data [again] should have been sent
9 from the branch back to the data centre as
10 normal."

11 So do you agree that, if a thorough
12 investigation had taken place into the actual
13 underlying data, there may have been more
14 clarity in that regard?

15 **A.** Yes.

16 **Q.** He says:

17 "I have not had an opportunity to examine
18 the detailed logs from this period to see
19 whether there were any issues and any
20 justification in the claim that this resulted in
21 apparent system losses of £3,000 as claimed."

22 Now, "Not had an opportunity to examine", do
23 you think that is a fair and accurate
24 description of the correspondence that we've
25 been going through before lunch?

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1 accurately record all data". In circumstances
2 where there was an opportunity to actually look
3 at the actual data in this case, do you think it
4 is fair that a statement was submitted in this
5 case with a belief that Horizon will accurately
6 record all of the data?

7 **A.** Well, he's saying that he believes it would do.
8 He's not saying that it did and he's making it
9 clear that the data is there and available for
10 consideration.

11 **Q.** But as the solicitor with conduct of the case,
12 do you think that it was fair to submit
13 a statement that had a belief in the accuracy,
14 without a proper assessment of what actually
15 happened in the particular facts of this case?

16 **A.** I accept what you're saying.

17 **Q.** Both of those case studies that we've been
18 looking at, the *Sefton* and *Allen* cases, were
19 being considered by you in 2012, and we've
20 looked at documents up until December 2012. As
21 at this period, late 2012 going into 2013, what
22 was your view as to the number of Horizon
23 challenges?

24 **A.** That Cartwright King were dealing with, you
25 mean?

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1 **A.** Well, it's suggesting that he was told not to do
2 that, which is correct, but, equally, he would
3 have had access to the data working within
4 Fujitsu, so he could have chosen to do that
5 himself, and I believe in fact Fujitsu went on,
6 or his managers went on to task him with that.

7 **Q.** The correspondence that we saw between yourself
8 and Mr Jenkins, and also the correspondence with
9 Mr Bradshaw, do you think that Mr Jenkins had
10 an opportunity to examine the logs but was told
11 not to or was told that it wasn't necessary?

12 **A.** Well, he was told it wasn't required at that
13 time, yes.

14 **Q.** If we go to the penultimate page, we have the
15 words, the same as the previous statement on
16 Horizon integrity. Scrolling over the page, we
17 have the final paragraph that says:

18 "In summary, I would conclude by saying that
19 I fully believe that Horizon will accurately
20 record all the data that is submitted to it and
21 correctly account for it. However it cannot
22 compensate for any data that is incorrectly
23 input into it as a result of human error, lack
24 of training or fraud."

25 So "I fully believe that Horizon will

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1 **Q.** Yes.

2 **A.** It was, as far as I understood, the same ones in
3 the list you'd previous flagged up with the
4 names.

5 **Q.** What did you think about the rising challenge to
6 the Horizon system at that time, late 2012 into
7 2013?

8 **A.** Well, clearly there was widespread concerns
9 about it.

10 **Q.** Were you concerned about it?

11 **A.** Yes.

12 **Q.** Can we please look at POL00108074. This is
13 advice in a case of Farzana Akhter, and if we
14 look at the final page, page 5, this is
15 an advice that was written by you, 31 August
16 2013.

17 If we go to the page before, "Horizon
18 Issues":

19 "The case is based on data provided by the
20 Horizon system. Given the defendant's denial of
21 any wrongdoing, the inference that could be
22 drawn is that she and the complainants are both
23 telling the truth that the system at fault. One
24 would therefore expect the defence to jump on
25 the Horizon bandwagon."

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1 If you were concerned about the Horizon
 2 system as at 2012/2013, why in advice were you
 3 writing about defendants jumping on the Horizon
 4 bandwagon?
 5 **A.** It's the repeated use of that word that I've
 6 come across and I've just adopted that same
 7 phraseology.
 8 **Q.** By that stage, you were aware of the Second
 9 Sight report, for example?
 10 **A.** Yes.
 11 **Q.** Why do you think that you were referring to the
 12 Horizon bandwagon, rather than referring to
 13 genuinely believed cases?
 14 **A.** As I say, I was subjected to hearing that word
 15 used repeatedly and I've adopted it myself.
 16 **Q.** Subjected by who?
 17 **A.** "Subjected" is not quite right but I'd been
 18 hearing it repeatedly.
 19 **Q.** Who from?
 20 **A.** People around me; people in POL; Investigators.
 21 **Q.** Can we look at POL00108114. Another advice,
 22 this case Tirath Chahal. Could we look at
 23 page 8. We're now September, so a month later,
 24 September 2013, page 7, paragraph 12. Again, we
 25 see there:

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1 "Had POL been possessed of the material
 2 contained within the Second Sight Interim Report
 3 during the currency of any particular
 4 prosecution, should/would we have been required
 5 to disclose some or all of that material to the
 6 defence?"
 7 This was an exercise, I think, that you took
 8 part in; is that correct?
 9 **A.** Yes, the review -- an initial sift of all those
 10 prosecutions, yes.
 11 **Q.** If we look at page 32, paragraph 94 of
 12 Mr Altman's advice. Can you briefly tell us,
 13 what did that "sift" involve?
 14 **A.** It was taking -- all the files that had been
 15 prosecuted were transporting to the office in
 16 Derby where I was relocated and we were given
 17 a question which had been posed by Mr Clarke to
 18 capture any cases where Horizon might have been
 19 an issue -- I think was the phrase he used -- so
 20 a very wide definition to ensure that all of
 21 those cases were considered subsequently.
 22 **Q.** Mr Altman notes here that:
 23 "At the conference [he] did make the
 24 observation ... that lawyers should not be
 25 engaged in sifting or reviewing a case if they

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1 "It is likely that this defendant will grasp
 2 at any potential defence available to him, and
 3 therefore an attempt to jump on the Horizon
 4 bandwagon must be anticipated."
 5 So this was just a phrase that was routinely
 6 used at Cartwright King, at the Post Office and
 7 which you adopted as your own?
 8 **A.** Yes.
 9 **Q.** I'm going to move onto a slightly separate topic
 10 and very briefly. Can we look at POL00038538.
 11 There came a time in 2013 where you were
 12 involved in a review of previous cases involving
 13 Horizon; is that correct?
 14 **A.** Correct.
 15 **Q.** This is the General Review advice written by
 16 Brian Altman. Did you have any interaction with
 17 Mr Altman at all?
 18 **A.** No, I didn't, no.
 19 **Q.** Can we look at page 27. Top of page 27, he says
 20 during a telephone call in which representatives
 21 of the Post Office, Bond Dickinson, Cartwright
 22 King and himself participated, it was agreed
 23 that a particular start date was proportionate.
 24 Then further down the page, at 75, he says
 25 the question that's been posed is:

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1 were responsible for conducting the case at
 2 trial ..."
 3 Sorry, at the paragraph above, 93, he says
 4 that he had been told that you and Martin Smith
 5 had been involved in sifting some of your own
 6 cases.
 7 **A.** That's right. The *Sefton and Nield* file was one
 8 that I was obviously aware of and that's on
 9 Mr Clarke's desk for him to consider.
 10 **Q.** Are you able to assist us with whether there was
 11 any change to the processes after Mr Altman's
 12 advice, in terms of how the sift was carried
 13 out?
 14 **A.** I can't recall.
 15 **Q.** Did you continue to review cases that you had
 16 been involved in?
 17 **A.** I'm not sure. Most of them were not related to
 18 me.
 19 **Q.** Did you review cases that close colleagues had
 20 been involved in?
 21 **A.** The vast majority of them were from
 22 pre-Cartwright King involvement.
 23 **Q.** What proportion of them, would you say, were
 24 Cartwright King cases?
 25 **A.** Less than 5 per cent.

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1 Q. Were they the kinds of cases that we've been
2 looking at today, prosecuted by Mr Bowyer, or
3 somebody like that?

4 A. Yes.

5 Q. One other document from slightly later, 2014
6 now. Can we look at POL00323681. We're now in
7 March 2014, and this is an email from you to
8 Rodric Williams, subject "Horizon -- Expert
9 Instruction", and you say:
10 "Martin is at a funeral. He has asked me to
11 forward these documents.
12 "Also I spoke to a consultant about 15
13 minutes ago who rang to run a position statement
14 by us for the board on Monday relating to not
15 commenting on turning points in criminal cases
16 that have gone to trial. I am waiting to speak
17 to Simon on the subject, but have yet to receive
18 an email from the consultant with her details to
19 respond."
20 Are you able to assist us with your
21 recollection about that issue?

22 A. No, I'm afraid I can't. I can't remember who
23 the consultant was or what happened
24 consequently.

25 Q. Do you recall the Post Office liaising with
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1 document, we can see the draft scope. So this
2 was an expert to replace Gareth Jenkins after
3 Mr Clarke had given his advice on the use of
4 Mr Jenkins.

5 A. That's right, I believe they went on a number of
6 meetings to a number of computer departments at
7 universities to try to source someone.

8 Q. Were you involved in that process at all?

9 A. No.

10 Q. The next document is POL00323683. This was also
11 attached to that email. This is a document
12 entitled "Horizon Core Audit Process", from
13 December 2013. If we scroll over the page, it
14 has an executive summary there that refers to
15 what we know as remote access, I think it says:
16 "When a transaction is conducted at
17 a counter, an auditable mechanism has been built
18 in to ensure these transactions are taken from
19 the counter, stored in the Horizon main branch
20 database and then copied to an audit database.
21 "This mechanism can be considered a 'closed
22 loop' where information is securely exchanged
23 from the counter to the Horizon branch database
24 and then on to the audit database.
25 "Whilst copies of transaction data are
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1 yourself or your colleagues about public
2 responses to issues relating to Horizon?

3 A. So I picked up this call because Martin Smith is
4 not available. Normally, he would be the first
5 point of contact and take all these kind of
6 calls, yes.

7 Q. Apart from this particular incidence, do you
8 recall any conversations or discussion of any
9 conversations where the Post Office was running
10 position statements by your firm?

11 A. No.

12 Q. The two documents that are attached, very
13 briefly, we'll just have a quick look at those.
14 Can we look at POL00323682. You'll see there
15 are two attachments: one is "Draft Scope for
16 computer experts" and the second is "Horizon
17 Core Audit Process", executive summary.
18 This is the "Draft Scope for computer
19 experts". I'm not going to go through it in any
20 detail but, can you assist us, is this
21 a document that you are aware of the purpose?

22 A. I was aware that Mr Clarke and Martin Smith were
23 engaged in trying to source a new expert and it
24 looks like this document was for their purposes.

25 Q. Thank you. If we could scroll through that
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1 provided to numerous external systems from the
2 main Horizon database, the Core Audit Process is
3 segregated, its records are securely sealed and
4 audit records cannot be accessed for changed
5 through external interfaces."

6 Is the issue of remote access something that
7 you had to deal with at all?

8 A. No.

9 Q. Is this a document that you recall having any
10 involvement in, other than forwarding?

11 A. No.

12 Q. No. Thank you. I'm going to pass on to
13 Ms Dobbin in a moment.
14 Is there anything else that you would like
15 to address at all or would like to say to the
16 Chair?

17 A. Simply to reiterate the apology I've made in my
18 written statement.

19 MR BLAKE: Thank you.
20 Sir, do you have any questions?

21 SIR WYN WILLIAMS: No, thank you.

22 MR BLAKE: Thank you. I think Ms Dobbin has some
23 questions.

24 SIR WYN WILLIAMS: Is it just Ms Dobbin? Just so
25 I know what's happening?
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1 **MR BLAKE:** It is, yes.
 2 **SIR WYN WILLIAMS:** Fine.
 3 **Questioned by MS DOBBIN**
 4 **MS DOBBIN:** I'm grateful. Thank you, sir.
 5 Mr Bolc, my name is Clair Dobbin and
 6 I represent Mr Jenkins. I want to ask you some
 7 questions about the provenance of his generic
 8 witness statement and I'm going to take you to
 9 some documents to do that but if, at any stage,
 10 I go too fast will you please let me know, in
 11 case the documents you're not familiar with.
 12 **A.** Okay.
 13 **Q.** I wanted to start, though, if I can, at the
 14 beginning with the document POL00141416. You've
 15 seen this already, Mr Bolc, it is the questions
 16 that Mr Bowyer framed with the expert's report,
 17 yes?
 18 **A.** Yes.
 19 **Q.** You did look at those earlier. I wonder if we
 20 could just please highlight those questions.
 21 Thank you.
 22 I just wanted to focus on them, if we may,
 23 a little more, Mr Bolc. So we can see that what
 24 the expert was to address was a description of
 25 the system in layman's terms, yes?
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1 **A.** Yes.
 2 **Q.** So, in other words, that the expert wasn't going
 3 to be asked to give an account of previous
 4 errors or issues that had affected the Horizon
 5 system, yes?
 6 **A.** I'm not sure if it goes that far.
 7 **Q.** Well, let's look at it again. It certainly
 8 doesn't go that far:
 9 "3) A summary of the basic attacks made on
 10 the system concentrating on any expert reports
 11 served in past cases."
 12 **A.** Yes.
 13 **Q.** The focus is on issues that have been raised in
 14 litigation, isn't it?
 15 **A.** Yes.
 16 **Q.** Then the fourth question, the question about
 17 whether or not human error could account for
 18 discrepancies, yes?
 19 **A.** The question is?
 20 **Q.** Well, again, it's quite a narrow question, isn't
 21 it?
 22 **A.** Yes, I understand what you're saying, yes.
 23 **Q.** So you agree with me, Mr Bolc, that these
 24 questions were not intended to elicit an expert
 25 report that, for example, set out the history
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1 **A.** Yes.
 2 **Q.** A declaration that it had yet to be attacked
 3 successfully?
 4 **A.** Yes.
 5 **Q.** A summary of the basic attacks made on the
 6 system concentrating on any expert reports
 7 served in past cases, yes?
 8 **A.** Yes.
 9 **Q.** I won't go through all of it but then, plainly,
 10 the last we see at 4, the question asking about
 11 human error, correct? In other words, could
 12 discrepancies be caused by human error, correct?
 13 **A.** Yes.
 14 **Q.** As I understand your evidence, Mr Bolc, you
 15 hadn't seen these questions; is that correct?
 16 **A.** Correct.
 17 **Q.** Do you agree that those questions are narrow in
 18 their compass?
 19 **A.** Repeat that, sorry.
 20 **Q.** Do you agree that the questions are narrow in
 21 their compass?
 22 **A.** Oh, narrow. Erm ... yes.
 23 **Q.** I think you said earlier that you agreed that
 24 they were focused on litigation, rather than on
 25 the system itself, correct?
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1 of, for example, past issues or errors that had
 2 arisen in the Horizon system?
 3 **A.** Isn't that covered in question number 3?
 4 A summary of the basic attacks made on the
 5 system?
 6 **Q.** But, as we can see, concentrating on any expert
 7 reports served in past cases, yes?
 8 **A.** Yes.
 9 **Q.** Were you aware -- and I think the answer to this
 10 must be that you weren't -- that the statement
 11 you ultimately served in the cases of Ms Sefton
 12 and Ms Nield and in the case of Mr Allen, that
 13 that statement was responsive to those four
 14 questions?
 15 **A.** You're correct. I wasn't aware.
 16 **Q.** Had you been aware of that, do you think you
 17 would have viewed that statement in a different
 18 light?
 19 **A.** Quite possibly, yes.
 20 **Q.** Because, again, you would have understood that
 21 the statement was narrower in its compass than
 22 you understood, yes?
 23 **A.** Well, I would have understood it was in relation
 24 to these specific questions, yes.
 25 **Q.** Right. It's right, Mr Bolc, and you would know
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1 this, wouldn't you, that the instructions that
 2 an expert has been given are part of the
 3 necessary inclusions on an expert report or
 4 statement, yes?
 5 **A.** Yes, that is correct. Yes.
 6 **Q.** So, in other words, that these questions ought
 7 to have formed part of the statements that you
 8 served in those cases, correct?
 9 **A.** They should have done, yes.
 10 **Q.** But you didn't know about them?
 11 **A.** That's correct.
 12 **Q.** Again, had that happened, then anyone who was
 13 reading that statement would have understood
 14 that, in fact, it was responsive to four quite
 15 narrow questions, correct?
 16 **A.** Indeed they would.
 17 **Q.** Do you also agree, Mr Bolc, that this sort of
 18 background is part of the material that ought to
 19 have been recorded on a disclosure schedule? In
 20 other words, that this formed part of the
 21 background of the statements that you went on to
 22 serve?
 23 **A.** That's correct.
 24 **Q.** But, again, it didn't go on a disclosure
 25 schedule because you didn't know anything about
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1 involved in that process --
 2 **A.** I was not.
 3 **Q.** -- is that right?
 4 **A.** That's correct.
 5 **Q.** So, for example, you wouldn't have known that
 6 this report set out that Mr Jenkins didn't know
 7 anything about 21 of the cases that Helen Rose
 8 had dealt with in her report?
 9 **A.** Sorry, repeat the question.
 10 **Q.** You wouldn't have known, for example, then, that
 11 Mr Jenkins had set out in this report that he
 12 didn't know anything about 21 of the cases that
 13 Helen Rose dealt with in her report?
 14 **A.** No.
 15 **Q.** All right. Do you agree, Mr Bolc, that the fact
 16 that this sort of report existed and became
 17 a statement was also relevant to your disclosure
 18 duties --
 19 **A.** Yes.
 20 **Q.** -- and that follows because a draft report or --
 21 it's not a draft report -- a report like this,
 22 that serves as a foundation for another report
 23 or a witness statement ought to be listed on
 24 a Schedule of Unused Material; do you agree?
 25 **A.** Yes, an Investigator's notebook or something
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1 these communications --
 2 **A.** That's correct.
 3 **Q.** -- is that right?
 4 I think, again, it follows from your
 5 evidence, Mr Bolc, that you didn't know that
 6 these four questions had resulted in a report
 7 being prepared by Mr Jenkins; is that correct?
 8 **A.** That's correct.
 9 **Q.** I just want to show you the first page of the
 10 report, just to ensure that you're not familiar
 11 with it. If I may, that is document
 12 FUJ00123914. Is that a document that you've
 13 seen before?
 14 **A.** Is it one of the two attachments to the --
 15 **Q.** It's not, Mr Bolc.
 16 **A.** Oh.
 17 **Q.** So perhaps if we could just scan through that
 18 document quickly.
 19 **A.** If it's not one of the two that would have been
 20 attached to his other statement, then I'm not
 21 sure I would have seen it, no.
 22 **Q.** All right. That report becomes Mr Jenkins'
 23 generic witness statement, Mr Bolc, and it was
 24 edited or cut and pasted into a witness
 25 statement. I think you've said you weren't
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1 like that.
 2 **Q.** But, again, that didn't happen because you
 3 didn't know anything about this report?
 4 **A.** Correct.
 5 **Q.** In terms of your interactions with Mr Singh and
 6 his involvement in commissioning this witness
 7 statement from Mr Jenkins, did he ever discuss
 8 with you what had happened in the *Misra* case?
 9 **A.** No.
 10 **Q.** Did he tell you that, in the *Misra* case, in
 11 fact, there had been evidence about the
 12 Callendar Square bug?
 13 **A.** No.
 14 **Q.** Did he tell you that, in *Misra*, Fujitsu had
 15 explained that there was a locking issue that
 16 caused transactions to be lost?
 17 **A.** No.
 18 **Q.** Did he explain to you that, in *Misra*, Fujitsu
 19 had explained that there was a record of around
 20 200,000 faults, both in the testing and live
 21 system on Horizon?
 22 **A.** No.
 23 **Q.** Was that something he explained? Did he explain
 24 anything to you about an error log?
 25 **A.** No.
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- 1 Q. Did he tell you that, in fact, the approach in
2 the *Misra* case had been that Mr Jenkins had been
3 asked to examine the data for about a year for
4 that post office, in order to ascertain whether
5 or not there were any issues with Horizon at
6 that branch?
- 7 A. No.
- 8 Q. He didn't ever suggest to you that it might be
9 worth commissioning a broader report into
10 Horizon to canvass those sorts of issues?
- 11 A. No.
- 12 Q. Just, if I may, going back to how the report
13 changed, my learned friend Mr Blake took you to
14 the line that appeared in the statement which
15 set out "my duties to the court"; do you
16 remember that line in the generic witness
17 statement?
- 18 A. Very brief sentence, yes.
- 19 Q. Did you have anything to do with the insertion
20 of that line into the draft witness statement?
- 21 A. No.
- 22 Q. You didn't explain to Mr Jenkins, for example,
23 the sorts of duties that an expert was subject
24 to and what duties to the court encompassed?
- 25 A. No.

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- 1 Q. I want to pick up, then, if I may, in the
2 chronology and, if I could go to a document
3 POL00097061. Please may we go to the entry for
4 the 19 October, page 3. So can you see
5 Mr Jenkins is saying:
6 "Sorry, but I'm not aware of this case ..."
- 7 A. Yes, I see it.
- 8 Q. If we just scroll up, please, a little bit more.
9 It's the bottom of page 1. Thank you. I think
10 we can see from the bottom of this page, this is
11 in relation to the original generic statement,
12 that Mr Jenkins hadn't understood that it
13 related to a specific case, that he thought it
14 was just a general statement.
15 So --
- 16 A. Sorry, where are you --
- 17 Q. I'm so sorry, if we're looking at 19 October,
18 it's been highlighted and drawn out. It's from
19 Mr Jenkins.
- 20 A. To Sharron Jennings?
- 21 Q. Yes. This is in relation to the generic
22 statement, the original generic statement.
- 23 A. Sorry, your question?
- 24 Q. You're looking a little puzzled?
- 25 A. I am, sorry, I've lost the thread.

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- 1 Q. Were those things that you anticipated or
2 thought had been explained to him by Mr Singh?
- 3 A. Yes.
- 4 Q. We know that that report ultimately became the
5 generic statement and we've seen the email
6 discussion with Ms Panter where she mentioned
7 that she had found it; do you remember?
- 8 A. Yes.
- 9 Q. I'm not going to go back to it because it
10 doesn't matter.
- 11 A. Yes, I do.
- 12 Q. In terms of Ms Panter, can I just check with
13 you, please, she's been referred to by one
14 witness as a paralegal. Can you assist us as to
15 whether or not she was, in fact, a solicitor at
16 your firm?
- 17 A. I can't. She may have been a paralegal, I can't
18 recall.
- 19 Q. She was certainly very junior, wasn't she?
- 20 A. Yes, she was.
- 21 Q. I think we've seen some reference to her just
22 having been out of Bar School, possibly. Does
23 that accord with your recollection of how junior
24 she was?
- 25 A. It's possible, yes.

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- 1 Q. All right. We can see from the earlier emails
2 that Ms Panter referred to a statement that she
3 had found, a generic statement, yes?
- 4 A. I understand, yes.
- 5 Q. I had just wanted to pick up the chain here to
6 see if you're familiar with this, that
7 Mr Jenkins hadn't understood that that report or
8 statement was for any specific case. Was that
9 something you were aware of or understood?
- 10 A. No.
- 11 Q. So what was your understanding?
- 12 A. Of, sorry?
- 13 Q. Of the status of the generic report, Mr Bolc.
14 Did you understand that it had just been
15 prepared or provided for a case or for any
16 specific reason?
- 17 A. Sorry, I'm not sure what it's been provided for.
- 18 Q. The original generic report that you took in
19 your cases and served, so the original document,
20 the original statement.
- 21 A. Sorry, I'm getting confused. Apologies.
- 22 Q. All right. Mr Bolc, you understand that in the
23 cases that you were involved with, there was
24 a generic statement that you served, in
25 Ms Sefton and Ms Nield's case --

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1 A. Yes.
 2 Q. -- and in Mr Allen's case --
 3 A. Yes.
 4 Q. -- and that started out life as a generic
 5 statement, correct?
 6 A. Right, okay.
 7 Q. Did you understand that?
 8 A. I'm not sure that I did.
 9 Q. So where did you think that this statement had
 10 come from?
 11 A. I assumed he'd prepared it.
 12 Q. Well, let's go a little further into the emails
 13 and see if we can make sense of this. Can we
 14 please go to POL00097137. Page 2, please. You
 15 were taken to this before, Mr Bolc, yes?
 16 A. Yes.
 17 Q. So this is Ms Panter telling Mr Jenkins -- so we
 18 can see this from the first paragraph, she
 19 suggested to him that his statement, so the
 20 expert report -- yes -- has been served as
 21 evidence in a number of Post Office cases; do
 22 you see that?
 23 A. Yes, I do.
 24 Q. Now, we saw not very long before that Mr Jenkins
 25 was saying he didn't know that his report was

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1 But I agree, it's unclear, shall we say?
 2 MS DOBBIN: Yes. That's really what I'm seeking
 3 your help with, Mr Bolc: whether or not you know
 4 that was, in fact, correct, that the statement
 5 had been served?
 6 A. Oh, I see. In November?
 7 Q. Yes.
 8 A. Well, it hadn't been served in either of the two
 9 cases that I was dealing with. I can't say if
 10 it had been served in any others.
 11 Q. Yes, and if it hadn't been signed, for example,
 12 then it's very unlikely that it would have been
 13 served in other cases; do you agree?
 14 A. Yes, I do, yes.
 15 Q. So, to the extent that she was giving the
 16 impression to Mr Jenkins that his report had
 17 been served in other cases, it does look like
 18 that was wrong; do you agree?
 19 A. I see what you're saying, yes.
 20 Q. Then what she goes on to tell him is that:
 21 "It should be noted [and this is the second
 22 paragraph] that to date most, if not all cases
 23 raising the Horizon system as an issue, have
 24 been unable/not willing to particularise what
 25 specific issues they may have had with the

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1 for any specific case, correct?
 2 A. Yes.
 3 Q. So can you help us with whether or not what she
 4 was suggesting there was actually true?
 5 A. I'm sorry, I'm still a bit confused.
 6 Q. Ms Panter, your colleague, was suggesting that
 7 Mr Jenkins' report had been served in other
 8 cases.
 9 A. Yes.
 10 SIR WYN WILLIAMS: I'm sorry to interrupt,
 11 Ms Dobbin, but is that actually right? As
 12 I read it, she's saying it's been served in the
 13 Nemesh Patel case and she's seeking his
 14 permission for it to be served in cases 1 to 6.
 15 I may have misread it but, at the moment,
 16 I think that's what it means.
 17 MS DOBBIN: Sir, that's really what I'm trying to
 18 get Mr Bolc's help with because the first
 19 paragraph says:
 20 "As you may be aware, your expert report has
 21 been served as evidence in a number of Post
 22 Office cases."
 23 SIR WYN WILLIAMS: Yes. I follow but it just seemed
 24 to me that the substance of it, once she
 25 actually (*unclear*), says something different.

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1 system, and how that shapes the nature of their
 2 defence.
 3 "As we already have your detailed report,
 4 I would like to serve it in each of the cases
 5 listed below ..."
 6 Yes?
 7 A. Yes.
 8 Q. Then, as has been pointed out by the Chair, she
 9 goes on to say that the report had already been
 10 served in one case, correct?
 11 A. Yes.
 12 Q. So saying:
 13 "I would like to serve your report in the
 14 remaining cases and have attached a case summary
 15 of each case so that you can familiarise
 16 yourself with the facts."
 17 A. Yes, that's what it says.
 18 Q. So, in other words, what she was saying here is
 19 "I intend to serve your report in cases where
 20 they haven't raised a specific issue with the
 21 Horizon system", correct?
 22 A. Well, that's -- yes, I think that's what she's
 23 saying but, clearly, in some of the cases
 24 specific issues had been risen (*sic*), as in for
 25 Mr Allen.

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1 Q. I'm going to go on to deal with that, Mr Bolc?
 2 A. Okay.
 3 Q. What I'm trying to set out is the background by
 4 which the statements came to be given.
 5 A. Yes.
 6 Q. So you agree with me, there are no meaningful
 7 instructions in this email, are there?
 8 A. No.
 9 Q. She's telling him "I want to serve your report
 10 in these cases and I've attached a case
 11 summary", correct?
 12 A. Correct.
 13 Q. She's not asking him to comment on the detail of
 14 the individual cases, is she?
 15 A. She's not, no.
 16 Q. You wouldn't instruct an expert, would you, by
 17 just sending them a case summary, would you?
 18 A. No, you wouldn't, no.
 19 Q. If you were instructing an expert, you might set
 20 out what the issues were in each individual
 21 case, correct?
 22 A. You would, yes.
 23 Q. You might provide all of the documentation
 24 that's relevant to the expert's opinion,
 25 correct?

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1 A. Yes.
 2 Q. But I want to look again at what Ms Panter is
 3 suggesting her approach was going to be.
 4 A. Yes.
 5 Q. So one can see:
 6 "I half expected to receive such a response.
 7 I can clarify with Gareth that it doesn't matter
 8 that specific cases are not quoted in his report
 9 as not one of them has raised a specific issue
 10 with the Horizon System itself, they have all
 11 been generic to date.
 12 "I will confirm with him I intend to use the
 13 same report, but I have had to run it past him
 14 first as a matter of course ..."
 15 Yes?
 16 A. That's what it says.
 17 Q. So, in other words, to be clear about this,
 18 Ms Panter's approach is: none of these cases
 19 have raised a specific issue, so Mr Jenkins
 20 doesn't need to deal with any of the
 21 underlying --
 22 A. Yes.
 23 Q. -- facts or information or relevant material,
 24 correct?
 25 A. Correct.

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1 A. Yes.
 2 Q. Just to be clear, this was the position in
 3 relation to two of the cases that you had
 4 conduct of, correct?
 5 A. Yes.
 6 Q. Can we please go to the next document in the
 7 sequence. This is POL00097137. Page 1, please.
 8 I think you were taken earlier to the email
 9 that appears on the second part of this page.
 10 A. The bottom part.
 11 Q. Yes. So Mr Jenkins, in reply, is asking why the
 12 general statement that he made couldn't be sent,
 13 correct?
 14 A. Yes, he is.
 15 Q. So the statement that doesn't refer to any
 16 specific cases at all, yes?
 17 A. Correct.
 18 Q. Then what she goes on to say at the top, if you
 19 could just have a look at that -- now, first of
 20 all Mr Bolc, before you answer, you'll notice
 21 that the addressee list has been redacted.
 22 A. I see.
 23 Q. Apparently it's email addresses, so this is
 24 a document which you may not have been sent,
 25 okay?

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1 Q. If we could then go on to see what she tells
 2 Mr Jenkins, and this is FUJ00153856. Page 1,
 3 please. So this is the email that Mr Jenkins is
 4 sent, setting out what the approach -- what
 5 approach is going to be taken. So, first of
 6 all, she apologises for approaching the cases in
 7 an unconventional way; do you see that?
 8 A. I do.
 9 Q. Then we see, if we go down a couple of
 10 paragraphs:
 11 "In response to your email, Gareth, I do
 12 intend to use the report that you have already
 13 provided. It doesn't matter that you have not
 14 mentioned a specific case in your report, as
 15 there has not been any specific criticisms
 16 raised by any of the defendants provided in my
 17 list of cases. It would be [different if
 18 a specific criticism was made] as your report
 19 would have to respond to that particular issue."
 20 Perhaps, if you just read on. I won't read
 21 it out, Mr Bolc, but if you were just to read on
 22 down a bit, in terms of what she says about the
 23 approach that's going to be taken.
 24 (Pause)
 25 A. Do you want me to read to the end?

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1 Q. Well, I think if you could just read to "That's
2 why it's important for you to consider the case
3 summaries".

4 A. Yes.

5 Q. Mr Bolc, having read that, do you think that
6 there's anything troubling or problematic about
7 the approach that Ms Panter was taking these
8 cases?

9 A. Well, yes, each case is individual and unique.
10 They should have all been addressed
11 specifically, not just in a generic way, as
12 suggested in this approach.

13 Q. May I run through a number of things that might
14 be thought wrong with this approach.

15 First of all, do you agree, Mr Bolc, there's
16 the lack of formality. Again, this didn't
17 constitute the instruction of Mr Jenkins as
18 an expert, did it?

19 A. No, it didn't.

20 Q. She was telling him again, wasn't she, that it
21 did not matter that his report did not address
22 any of the facts of the cases; do you agree?

23 A. I do.

24 Q. She was proposing this approach providing him
25 with only the barest amount of information about

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1 A. Yes.

2 Q. Precisely because, as you say, it's the
3 responsibility of the prosecutor to consider
4 each case on its facts and merits, correct?

5 A. Yes.

6 Q. By this approach, Ms Panter was essentially
7 abrogating that responsibility; do you agree?

8 A. Yes.

9 Q. It's almost as though Post Office wanted to have
10 it both ways: that they want to present this
11 evidence as an expert report but absent any
12 expert instructions or any of the material that
13 an expert would need to see in order to be able
14 to provide a proper opinion; do you agree?

15 A. Well, I agree that he should have been properly
16 instructed and given all the information he
17 needed, yes.

18 Q. Can you explain why he wasn't?

19 A. I cannot.

20 Q. But it's part of a deliberate strategy, isn't
21 it, Mr Bolc?

22 A. I couldn't say.

23 Q. It's a deliberate litigation strategy not to
24 engage with any of the facts in a given case,
25 correct?

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1 each case; do you agree?

2 A. Yes.

3 Q. Then she appears to have the idea that it's
4 proper for the prosecution by this route to put
5 the onus on the defence, correct?

6 A. Correct.

7 Q. But then seemed to envisage that, if that
8 happened, Mr Jenkins might have to give evidence
9 at the trial, yes?

10 A. Might not have to give evidence, yes.

11 Q. Might have to give evidence at a trial?

12 A. Might have to?

13 Yes, suggesting it's a possibility he would
14 have to give evidence, yes.

15 Q. That's not an approach that makes very much
16 sense; do you agree?

17 A. He should have been properly instructed by
18 either Ms Panter or Mr Singh, yes, in a formal
19 way, as an expert witness, with all the
20 requirements therein.

21 Q. It was wrong to tell him that he didn't need to
22 consider the facts of any individual case; do
23 you agree --

24 A. Yes.

25 Q. -- that was the wrong approach?

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1 A. I'm not sure that I would suggest that that's
2 what she's trying to achieve.

3 Q. Well, she's telling him in terms, isn't it, that
4 it doesn't matter that he doesn't know anything
5 about the facts of a given case?

6 A. She is, yes.

7 Q. Well, can we just look, then, at how this
8 develops. Can we go, please, to FUJ00156677.
9 So again, this is what follows and, if we just
10 look at the documents that are sent, it's only
11 the summary of the case and the indictment,
12 correct?

13 A. Yes.

14 Q. Again, if we look at what the instructions, such
15 as they are, are, you can see it's:

16 "... could you consider the attached and
17 provide a signed and dated report which deals
18 with each individual case."

19 Then some information by way of update.

20 A. Yes, that's correct.

21 Q. So, again, no instructions; do you agree?

22 A. No formal instructions, no.

23 Q. So no instructions to an expert?

24 Sorry, by that, Mr Bolc, I mean that those
25 are not the sort of instructions that would be

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1 given to an expert, are they?
 2 **A.** No.
 3 **Q.** Again, on the basis of only the barest amount of
 4 information, correct --
 5 **A.** Correct.
 6 **Q.** -- and not a proper instruction to consider the
 7 issues or the facts of a given case, correct?
 8 **A.** Well, he had some information but, yes, not the
 9 complete package, yes.
 10 **Q.** Well, some information?
 11 **A.** Yes.
 12 **Q.** It's a case summary and an indictment.
 13 **A.** Yes.
 14 **Q.** There's no attempt, is there, on the part of
 15 Ms Panter, to set out in relation to any of
 16 these cases what the individual facts or
 17 circumstances or issues between the defence and
 18 the prosecution are.
 19 **A.** I think what I'm trying to say is it's not --
 20 I'm not sure that it's a deliberate strategy by
 21 her. It's probably out of inexperience that
 22 she's doing this, rather than because she's
 23 trying to achieve something.
 24 **Q.** Mr Bolc, why is she doing that in respect of
 25 cases that you have conduct of?

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1 whether he'd been formally instructed before
 2 this email.
 3 **Q.** I think Mr Blake put to you that Mr Jenkins
 4 hadn't received any meaningful instructions in
 5 the materials you had been taken to and I think
 6 you said he hadn't been given any formal
 7 instructions but Mr Blake was right, wasn't he:
 8 Mr Jenkins wasn't provided with any meaningful
 9 instructions in these cases, was he?
 10 **A.** Yes, although I wasn't aware, as I said, that he
 11 hadn't been formally instructed in the terms
 12 I've described.
 13 **Q.** Yes, but Mr Bolc, what you suggested in your
 14 evidence was that Mr Jenkins had been instructed
 15 in each case to amend his generic report in
 16 order to deal with the facts of the individual
 17 cases?
 18 **A.** Yes.
 19 **Q.** Correct. But we haven't seen any instructions
 20 thus far that actually even ask him to deal with
 21 individual cases; do you agree?
 22 **A.** Correct.
 23 **Q.** May I then please take you to FUJ00124105. You
 24 were taken to this, Mr Bolc, so I don't want to
 25 retread ground that we've already been over but,

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1 **A.** She'd been tasked to coordinate getting the
 2 expert reports.
 3 **Q.** Can we turn then to the instructions that you
 4 gave, and this is FUJ00153865. You don't add
 5 any detail, do you, Mr Bolc to those
 6 instructions or substance?
 7 **A.** Yes, I don't know what I mean by "outlines" but
 8 probably case summaries.
 9 **Q.** So you've provided some more information but you
 10 don't provide anything more by meaningful
 11 instruction, do you?
 12 **A.** Well, some of my case summaries would have been
 13 quite detailed but I can't say what papers they
 14 actually were. It says "Allen -- Sefton & Nield
 15 papers", I'm not sure what that includes.
 16 **Q.** A case summary is not instructions to an expert,
 17 is it?
 18 **A.** Again, no.
 19 **Q.** Again, this isn't the sort of instruction one
 20 might expect to see to an expert in a given
 21 case, setting out the issues, setting out what
 22 you want their opinion on, anything like that,
 23 is it?
 24 **A.** No, that's right. As I say, I wasn't aware of
 25 what previous instructions had been received or

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1 again, one can see from that that Mr Jenkins was
 2 still of the understanding that all he was
 3 required to do was sign the standard version of
 4 his report, correct?
 5 **A.** Yes.
 6 **Q.** He's asking you in this email, isn't he, whether
 7 or not, in fact, now that he's looked at it,
 8 whether he ought to go further, correct?
 9 **A.** Yes, he is.
 10 **Q.** So he's asking you for guidance about his role
 11 in this litigation; do you agree?
 12 **A.** In his role or specific information?
 13 **Q.** Well, he's asking you about the approach that he
 14 was supposed to take to these cases. He's
 15 saying to you:
 16 "However, having read through some of the
 17 info you've given me, perhaps you want me to
 18 cover some other things."
 19 **A.** Yes, he's pointing to the detail.
 20 **Q.** Yes. He's saying to you, "Well, here are things
 21 that could be explored in these cases", correct?
 22 **A.** He is, yes.
 23 **Q.** I think we may have missed this, just for
 24 completeness, at the very end, but it's there
 25 that we see he points out to you that he hadn't

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1 been provided with any of the ARQ data, correct?
 2 **A.** Sorry, what?
 3 **Q.** So if we look at the very final paragraph in
 4 that email.
 5 **A.** Yes, so he's said audit data, not ARQ data.
 6 **Q.** Sorry, that may be our familiarity with it.
 7 **A.** Yes.
 8 **Q.** But that's what he's flagging up, correct, that
 9 he hadn't looked at any audit data, yes?
 10 **A.** It is. As I say, at that stage, I wasn't sure
 11 what he was referring to.
 12 **Q.** I want to -- sorry, Mr Bolc, I didn't mean to
 13 speak over to you?
 14 **A.** It's just that I wasn't aware of what ARQ data
 15 was or that it existed.
 16 **Q.** I wanted to ask you about that, Mr Bolc. Does
 17 that mean you were prosecuting these cases
 18 without Post Office having even provided you
 19 with some basic information about how the
 20 Horizon system worked, the ARQ data that was
 21 available --
 22 **A.** There's references --
 23 **Q.** -- that sort of information --
 24 **A.** -- to data in all different shapes and forms but
 25 nowhere does it say ARQ data in the papers that

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1 **A.** Yes.
 2 **Q.** So you couldn't quite understand what he was
 3 referring to when he said, "I don't have
 4 information about complaints and
 5 investigations"?
 6 **A.** Yes.
 7 **Q.** Am I right in thinking you didn't go back to him
 8 to try and understand what he meant by that?
 9 **A.** That's correct, yes.
 10 **Q.** You didn't try and resolve why that appeared
 11 different to what he was saying --
 12 **A.** I did not, no.
 13 **Q.** -- in his statement. So, even though it looked
 14 clear that there was a misunderstanding between
 15 you, you didn't think you ought to resolve that
 16 before his statement was served?
 17 **A.** No.
 18 **Q.** Again, is there a reason, Mr Bolc, why you
 19 wouldn't want to make sure there's common
 20 understanding between you before the witness
 21 statement was served?
 22 **A.** I can't recall.
 23 **Q.** I just want one last question, if I may, please.
 24 Mr Bolc, you ultimately decided in the case
 25 of Ms Sefton and Ms Nield that you weren't going

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1 I was given or dealt with, yeah, or
 2 an explanation of what that was.
 3 **Q.** What I mean is, Mr Bolc, that when your firm
 4 took over this -- got this role or -- I don't
 5 know -- did you have a contract with Post Office
 6 to do this work or was it a more informal
 7 arrangement?
 8 **A.** Well, I couldn't tell you because -- yes.
 9 **Q.** All right. But, at the point in time when you
 10 became solicitor in these private prosecutions,
 11 you hadn't been provided with any sort of
 12 briefing or material that explained to you about
 13 Horizon, how Horizon worked or what ARQ data was
 14 available?
 15 **A.** Correct, yes.
 16 **Q.** May I also just touch again on one small point,
 17 and it was the reference in this email to
 18 Mr Jenkins having no information about
 19 complaints and investigations, yes?
 20 **A.** Yes.
 21 **Q.** I think in answer to questions by Mr Blake, you
 22 accepted that, on the face of his witness
 23 statement, Mr Jenkins had set out or provided
 24 information about challenges in previous cases,
 25 correct?

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1 to obtain any of the data, correct, and you've
 2 explained that you didn't understand that there
 3 was ARQ data and what that was, yes?
 4 **A.** Well, in the case of Mr Allen, I'd referred it
 5 back to POL to see if they wanted to get the
 6 further data.
 7 **Q.** All right, I'm just dealing with Ms Sefton and
 8 Ms Nield for the moment?
 9 **A.** Yes, in her case, yes.
 10 **Q.** You decided and you said that you thought there
 11 were two explanations, but I think they came to
 12 the same thing, that you didn't understand what
 13 the significance of that data might be?
 14 **A.** Absolutely, yes.
 15 **Q.** But is another explanation that, in fact, the
 16 prosecution was proceeding on the basis that
 17 that data didn't matter because their case was
 18 being treated as false accounting and outside
 19 the Horizon system? Do you recall that you were
 20 taken to your reply to the request for
 21 disclosure and that's what the response was?
 22 **A.** Initially, yes, but I think the case progressed
 23 after that and they -- the defence made clear
 24 that it was a Horizon challenge.
 25 **Q.** All right. So this was simply your

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1 misunderstanding at that time --
 2 **A.** I believe so, yes.
 3 **Q.** -- of what that data might demonstrate?
 4 **A.** Yes.
 5 **MS DOBBIN:** Thank you. I'm grateful.
 6 **MR BLAKE:** Thank you very much.
 7 Sir, I'm told that Mr Moloney has two
 8 minutes of questions.
 9 Well, Mr Moloney is one of the persons who
 10 tells me he is going to be two minutes and
 11 I have reasonable faith that he means it!
 12 **Questioned by MR MOLONEY**
 13 **MR MOLONEY:** I'll try to maintain that reputation,
 14 sir.
 15 Just a few questions, Mr Bolc, if I may.
 16 **A.** Yes.
 17 **Q.** You said in answer to the questions from
 18 Ms Dobbin that the four questions asked of
 19 Mr Jenkins by Mr Bowyer should have been
 20 included in this report?
 21 **A.** You'll have to point me to them, sorry.
 22 **Q.** I wanted to save time. You remember the four
 23 questions essentially saying "Please detail the
 24 attacks that had been made on the Horizon system
 25 in previous cases", and so on, those four

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1 **A.** Yes.
 2 **Q.** When Gareth Jenkins wrote statements that didn't
 3 include the usual declaration, did that not ring
 4 alarm bells for you --
 5 **A.** It should have done.
 6 **Q.** -- of the quality of the education that might
 7 have been provided by Mr Singh?
 8 **A.** It should have done.
 9 **Q.** Did you not ask yourself, for example, where is
 10 the declaration?
 11 **A.** So when I received those reports, I was focusing
 12 on the content, rather than the presentation and
 13 the proper requirements.
 14 **Q.** Right. Okay. So when you signed off,
 15 Mr Jenkins' report in Mr Allen's case in the
 16 correspondence with Mr Bradshaw that we've seen,
 17 saying it was sufficient for what you needed,
 18 you didn't think about the expert's declaration
 19 then?
 20 **A.** No.
 21 **MR MOLONEY:** Thank you very much. That's all I ask.
 22 **SIR WYN WILLIAMS:** I take it that's it, Mr Blake?
 23 **MR BLAKE:** That is, yes, sir.
 24 **SIR WYN WILLIAMS:** So thank you, Mr Bolc, for
 25 providing your witness statement and for giving

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1 questions. You said that those four questions,
 2 essentially the instructions to Mr Jenkins,
 3 should have been included within his report. Do
 4 you remember that now?
 5 **A.** Yes, I do now, yes.
 6 **Q.** Right, because the instructions to an expert of
 7 that kind should be included within the report?
 8 **A.** They should, yes.
 9 **Q.** You obviously knew that an expert report should
 10 include the usual declaration, including the
 11 expert's duties to the court, primarily, and
 12 that the expert was required to disclose
 13 anything they were aware of that might undermine
 14 the opinion they expressed?
 15 **A.** Yes.
 16 **Q.** Yes. Now, you said to Ms Dobbin that you
 17 assumed that Jarnail Singh would have educated
 18 Mr Jenkins in his role as an expert, as he'd
 19 used him in the Seema Misra case?
 20 **A.** Yes.
 21 **Q.** Yes. Now, you've spoken today of how you
 22 weren't particularly impressed with Mr Singh,
 23 that you didn't know how he had the job that he
 24 had, at the start of your evidence; do you
 25 remember that?

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1 evidence before me today. I am grateful to you.
 2 We're sitting on Monday next week, are we
 3 not, Mr Blake?
 4 **MR BLAKE:** We are, yes, with Mr Atkinson.
 5 **SIR WYN WILLIAMS:** I've said that we're starting at
 6 10.30 on Monday. There's an outside chance --
 7 and it is only an outside chance -- that it may
 8 be a few minutes later than that because I have
 9 to be somewhere for a little while on Monday
 10 morning, but if there is a delay, it won't be
 11 very much of a delay. All right?
 12 **MR BLAKE:** Thank you very much, sir.
 13 **SIR WYN WILLIAMS:** So 10.30 on Monday morning, or as
 14 soon as thereafter as I appear.
 15 **MR BLAKE:** Thank you.
 16 **(3.02 pm)**
 17 **(the hearing adjourned until 10.30 am**
 18 **on Monday, 18 December 2023)**
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I N D E X

ANDRZEJ KONRAD BOLC (sworn)	1
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