

Tuesday 30 April 2024

1
2 (9.45 am)
3 **MR STEVENS:** Good morning, sir, can you see and hear me?
4 **SIR WYN WILLIAMS:** Yes, I can, thank you.
5 **MR STEVENS:** Thank you. We'll be hearing from Mr Flemington
6 this morning.
7 **SIR WYN WILLIAMS:** Yes.
8 **HUGH MEYRICK FLEMINGTON (sworn)**
9 **Questioned by MR STEVENS**
10 **MR STEVENS:** Please could you state your full name.
11 **A.** Hugh Meyrick Flemington.
12 **Q.** Thank you for providing evidence to the Inquiry today
13 and also for providing a detailed written statement.
14 I want to turn to that statement, it should be in
15 a bundle of documents in front of you. Do you have
16 that, dated 9 March 2024?
17 **A.** Yes, I do.
18 **Q.** It runs to 195 paragraphs?
19 **A.** Yes.
20 **Q.** Can I ask you, please, to turn to page 47 of the
21 statement?
22 **A.** Yes.
23 **Q.** Do you see your signature?
24 **A.** Yes, I do.
25 **Q.** Can I ask you to confirm whether the contents of that

1

1 non-contentious matters; is that correct?
2 **A.** Yes, yes.
3 **Q.** So the conduct of civil and criminal litigation fell to
4 a different team within the Royal Mail Group?
5 **A.** Yes.
6 **Q.** When Post Office Limited separated, so 1 April 2012, you
7 transferred to Post Office Limited as an employee?
8 **A.** Yes.
9 **Q.** At that point, the Post Office Limited Legal Team became
10 responsible for civil and criminal litigation?
11 **A.** Yes.
12 **Q.** At that point, you reported to Susan Crichton?
13 **A.** Yes.
14 **Q.** Your responsibilities as Head of Legal, were they ever
15 written down in a single document?
16 **A.** I believe I would have had a contract of employment,
17 obviously, and the Head of Legal role would have been
18 defined somewhere.
19 **Q.** So defined somewhere but can you recall roughly what
20 those responsibilities were?
21 **A.** It would be in relation to managing the team of lawyers,
22 managing the budgeting, managing them from a personal --
23 personnel point of view.
24 **Q.** Would that have included managing lawyers responsible
25 for criminal and civil litigation?

3

1 statement are true to the best of your knowledge and
2 belief?
3 **A.** Yes, it is.
4 **Q.** For the transcript, that is document reference number
5 WITN08620100. That now stands as your evidence in the
6 Inquiry, it will be published on the Inquiry's website
7 soon. I'm going to ask you some questions about it now.
8 Just start with your background, is it right you
9 qualified as a solicitor in 1996?
10 **A.** Yes.
11 **Q.** In terms of what's relevant to this Inquiry you were
12 employed by Royal Mail Group as a lawyer in the Group
13 Tech and IP Team in June 2009?
14 **A.** Yes.
15 **Q.** Before then you practised as a solicitor, both in firms
16 and in-house, in the areas of mergers and acquisitions
17 and in other commercial matters?
18 **A.** Yes.
19 **Q.** As I say, you started in Royal Mail Group in 2009, you
20 became Head of Legal for Post Office Team in Royal Mail
21 Group in August 2011 --
22 **A.** Yes.
23 **Q.** -- so still within the Royal Mail Group but on the Post
24 Office Legal team. Your evidence is that, at that
25 point, the Post Office Legal Team was only dealing with

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1 **A.** So there's an important distinction to make here, which
2 is that it would be managing them from a personnel point
3 of view but, in terms of supervising the litigation,
4 that was to be done by Susan Crichton.
5 **Q.** We'll come back to that in due course. The reporting
6 lines: were you the only Head of Legal at this point or
7 were there others?
8 **A.** Yes, I was the only Head of Legal from when I was
9 appointed in 2011.
10 **Q.** In due course, were there additional Heads of Legal
11 appointed when you were there?
12 **A.** Not when I was there.
13 **Q.** I want to come to the first topic, which is a few
14 matters in 2010 concerning audit data and the first
15 point is Track II data?
16 **A.** Mm-hm.
17 **Q.** Can I start, please, with POL00416959. This is a letter
18 addressed to you, dated 12 February 2010 from Stephen
19 Dilley at Bond Pearce, who became Bond Dickinson and
20 then Womble Bond Dickinson.
21 **A.** Yes.
22 **Q.** If we can just go down slightly. It talks about
23 potential deletion of Track II data. We see in the
24 first paragraph under background, it states:
25 "... Track II data contains the 15 to 19 character

4

1 primary account numbers relating to customer
2 transactions, expiry date of the card, information about
3 what the card can be used for and how it should be
4 handled at the point of payment and other discretionary
5 data."

6 So this is all personal data relating to customers'
7 debit and credit card transactions; is that right?

8 **A.** I believe so.

9 **Q.** It goes on to say that:

10 "You believe that Track II data has to be destroyed
11 to comply with PCI DSS."

12 Just pausing there, does that stand for Payment Card
13 Industry Data Security Standards?

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

15 **Q.** Do you recall what it was in lay terms?

16 **A.** In lay terms, it would be the rules that the PCI
17 operated, that you had to abide by if you took card
18 payments in your business.

19 **Q.** So PCI being the Payment Card Industry?

20 **A.** Yes.

21 **Q.** So there was presumably, at the time, or at least Post
22 Office believed there was a need to comply with PCI
23 standards to delete this Track II data?

24 **A.** Yes.

25 **Q.** If we go down to "Fujitsu's advice", it says:

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1 "Can we delete it or not", and I was told that there was
2 a risk of deleting it in relation to the Horizon cases.

3 **Q.** Well, let's go to the next document. It's FUJ00230908.

4 If we could go to the bottom of page 1, please. We
5 see there's an email there from Gareth Jenkins on
6 17 February 2010. Carry on down to the bottom, please.
7 That's fine, thank you.

8 "Geoff/Suzie,

9 "My suggested answers to most of the questions below
10 prefixed [GIJ] in bold italics lower down in the email
11 trail".

12 If we can go down to that, it's page 4, please.

13 Yes, that's great. Thank you. We see your email of
14 15 February to Jean-Philippe Prenovost, and you
15 describe:

16 "Below is the magic list of questions compiled from
17 a few people today since our call this morning. Would
18 Fujitsu be able to get us responses by close of play on
19 Friday [please]?"

20 If we could go down a bit further, please, we see at
21 (1) the question is:

22 "Before Track II data is deleted, would Fujitsu be
23 able to say precisely what impact the deletion would
24 have eg what additional data would also be deleted or
25 amended and if so, how it would be amended."

7

1 "Fujitsu's corporate legal counsel, Jean-Philippe
2 Prenovost, has stated in his email of 12 February 2010
3 to you that if Track II data is destroyed, Fujitsu would
4 not be able to testify that historical data is true,
5 accurate and (crucially) unchanged."

6 You account some matters to clarify, such as the
7 reliability of the system, et cetera. That document can
8 come down for the time being, it's just for background.

9 So setting the scene for track data, effectively the
10 Post Office wanted to delete data that wasn't essential
11 for branches' transactions or the branch accounts.

12 **A.** So there was a PCI compliance audit done, I believe and,
13 as part of that, it was found that the system held
14 Track II data, as I recall, and the PCI expert said that
15 that was counter to the PCI rules.

16 **Q.** Yes, so going to my question, which was deleting this
17 data, it wasn't data on which the branches relied to
18 generate their branch accounts?

19 **A.** I can't -- I wouldn't have known and I can't recall what
20 kind of data it would have been.

21 **Q.** Well, if you're asking to delete data that was relevant
22 to the generation of branch accounts, that would seem
23 quite surprising, wouldn't it?

24 **A.** At the time, I would have just known that there was this
25 data that we held and the question in front of me was

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1 There's a lengthy explanation there from Gareth
2 Jenkins towards the end saying:

3 "The result of this is that the audit of the
4 original message would be changed and it would no longer
5 be possible to assert it has not been changed since
6 originally recorded. Also the revised audit file would
7 need to be resealed again indicating that it has not
8 been tampered with since the time of the 'official'
9 change."

10 So, at this time, do you recall if this message was
11 passed on to you?

12 **A.** I don't recall. I remember that the sort of list of
13 questions would have come from the PCI consultant.

14 **Q.** Right.

15 **A.** So I didn't have a technical knowledge of what was being
16 asked or what the discussions were around the data.

17 **Q.** Were you broadly aware that -- well, firstly you're
18 trying to delete this Track II data, you're aware of
19 that?

20 **A.** So there was a proposal of should we delete the Track II
21 data, and it was trying to find out is there an issue
22 with deleting that Track II data?

23 **Q.** Could it affect other data --

24 **A.** Yeah, yeah.

25 **Q.** -- which we'll come to in a second, what that other data

8

1 was. You were presumably aware that the concern was
 2 that, if other data in the audit files was disturbed, it
 3 could affect Post Office Limited's ability to bring or
 4 defend claims concerning subpostmasters?
 5 **A.** So at the highest level, it was explained to me that, if
 6 you did something with this data, there might be a risk
 7 that it would prejudice the ability to bring those
 8 cases.
 9 **Q.** Right.
 10 **A.** But I didn't understand the detail of that.
 11 **Q.** If we can turn the page, please, to page 6 and if we
 12 could go to the bottom, please. We see, paragraph 5:
 13 "What is the probability that the deletion would
 14 affect the data contained in the following?"
 15 It includes data relating to cash receipts from
 16 branch, data relating to transactions and, in
 17 particular, "Data relating to transactions says":
 18 "These may be affected if they are card related."
 19 I think you said you can't remember in detail if you
 20 received these answers to the questions. Given these
 21 were important questions, would you have followed up on
 22 this and got answers to them? Do you think that's
 23 likely?
 24 **A.** It's possible, yes.
 25 **Q.** Do you think it's likely?

9

1 it a legitimate deletion, Post Office is considering
 2 a proposal to delete data from the audit files for data
 3 protection purposes and to comply with this PCI
 4 guidance?
 5 **A.** Yes, it was driven by complying with the PCI rules.
 6 **Q.** But Post Office was aware that, in doing that, there was
 7 a risk to the integrity of the remainder of the data in
 8 the audit file?
 9 **A.** So, as I understood it from my non-technical
 10 understanding, it was expressed that there was
 11 a possibility it would be harder to bring cases on the
 12 Horizon issue if this data was touched at all.
 13 **Q.** That understanding you have, did you share that with
 14 others on, say, ExCo, the Executive Committee?
 15 **A.** The PCI matter, I was reporting to Susan Crichton on it,
 16 as my line manager, and it's likely that the consultant
 17 was working as part of the CIO's team.
 18 **Q.** Would you, do you personally know if this was brought up
 19 at Board level?
 20 **A.** Can't recall.
 21 **Q.** Do I take it from that that you didn't discuss with
 22 anyone on the Board about this PCI issue?
 23 **A.** I can't recall that or any paper on it.
 24 **Q.** I want to go to the second topic on audit data,
 25 concerning duplicate transactions. Please can we bring

11

1 **A.** I don't know because I can't say for certain whether
 2 what then happen would have been a call between the PCI
 3 consultant and Fujitsu. This was all very technical and
 4 I wouldn't have understood what they were talking about,
 5 necessarily, in terms of all the different types of data
 6 or the implications. So I would have spoken to the PCI
 7 consultant about it.
 8 **Q.** Did you understand, let's go back and understand this
 9 much: firstly, that it was possible for Fujitsu to
 10 delete data that was in the audit file?
 11 **A.** I'm not sure I would have understood that point, no.
 12 **Q.** Well, let's -- you were here talking about what the
 13 effect of deleting Track II data would be. If Fujitsu
 14 couldn't delete the data, do you think the simple answer
 15 would be "We don't need to answer all these questions,
 16 we can't delete the Track II data"?
 17 **A.** Yes, I wouldn't have necessarily thought about that but,
 18 yes.
 19 **Q.** So, if you'd turned your mind to it, at least, you
 20 accept that you must have been aware that Fujitsu could
 21 delete files within the audit record?
 22 **A.** Or that it might be possible, I don't --
 23 **Q.** It might be possible?
 24 **A.** Yeah.
 25 **Q.** In this case, what was being suggested is -- let's call

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1 up FUJ00121097. Could we turn to page 2, please, and
 2 the email towards the bottom, the -- yes, that's it.
 3 Thank you.
 4 So this is an email from Penny Thomas, dated 30 June
 5 2010, and one which has been seen by the Inquiry before.
 6 It's sent to Sue Lowther, Mark Dinsdale and Jane Owen.
 7 Do those names ring a bell to you?
 8 **A.** Mark Dinsdale, because he comes up in one of the other
 9 documents in the bundle, but not the others.
 10 **Q.** I won't ask the others you don't remember but Mark
 11 Dinsdale, was he in your line management chain at all?
 12 **A.** He wasn't anything to do with Legal, I remember that.
 13 **Q.** It says:
 14 "We have identified that number of recent ARQ
 15 returns contain duplicate transaction records."
 16 It goes on to explain how that's happened, that the
 17 HNG-X retrieval mechanism does not remove duplicates.
 18 Now, you're aware -- well, let's rephrase that, sorry.
 19 Were you aware at the time about ARQ and audit data
 20 being used for civil proceedings and prosecutions?
 21 **A.** No. My technical knowledge wouldn't have known anything
 22 about that kind of thing.
 23 **Q.** Well, this is June 2010 and we saw earlier, when
 24 relating to the PCI matter, you were raising questions
 25 about audit data and Post Office ability rely on it in

12

1 criminal and civil proceedings. Are you saying you
 2 weren't aware of --
 3 **A.** So the questions that I was raising in PCI would have
 4 been provided by the PCI consultant. I wouldn't have
 5 understood all the technical things that they were
 6 talking about.
 7 **Q.** Would you say that's particularly technical, the fact
 8 that Post Office were relying on audit data for civil
 9 and criminal proceedings?
 10 **A.** So I wouldn't know what data they were relying on, just
 11 that there was some data that was important to the
 12 criminal cases.
 13 **Q.** Let's move on. If we turn to page 1, please, of this.
 14 Penny Thomas' email of 2 July says:
 15 "I have just completed a conference call with Mark
 16 Dinsdale, Alan Simpson and Jane Owen."
 17 Five bullet points down, it says:
 18 "I talked them through the ARQs affect list and
 19 asked that they confirm whether the West Byfleet and
 20 Porters Avenue ..."
 21 Pausing there, do those, West Byfleet and Porters
 22 Avenue, ring any bells for you?
 23 **A.** No.
 24 **Q.** West Byfleet and the *Seema Misra* trial, does that --
 25 **A.** So the name "Misra" rings a bell.

13

1 relating -- was it IP and IT?
 2 **A.** So, if you're talking about 2010 --
 3 **Q.** Yes.
 4 **A.** -- I was in the Post Office Legal Team at that point and
 5 there's about four lawyers and Susan Crichton.
 6 **Q.** Yes.
 7 **A.** The IP/IT Team at Royal Mail is separate, the Criminal
 8 team is separate, and they're based at two other
 9 different offices.
 10 **Q.** So there is an entirely separate office?
 11 **A.** Yes.
 12 **Q.** The Criminal Team is a physically separate office from
 13 where you are?
 14 **A.** So the Criminal Team sat in a physically separate office
 15 on its own. The Royal Mail IP/IT Team and Royal Mail
 16 Civil Litigation Team sat in a Royal Mail office and
 17 then Post Office Legal was in a third office at the Post
 18 Office Headquarters.
 19 **Q.** So is it fair to say that day-to-day discussions, the
 20 Post Office Legal team, your evidence is, didn't really
 21 have much communication with the Civil Litigation or
 22 Criminal Litigation team?
 23 **A.** No, no.
 24 **Q.** Well, let's move to look at that and some of the
 25 response to problems raised regarding Horizon. We don't

15

1 **Q.** "... where the only cases listed where it progressed to
 2 Court ...
 3 "I asked them to confirm whether transaction records
 4 of West Byfleet had actually been presented at Court or
 5 whether records had only been passed to the defence
 6 expert ..."
 7 So there appears to be a discussion here on how the
 8 affect of these duplicate records in the audit data had
 9 affected any court proceedings. Were you made aware of
 10 this at the time?
 11 **A.** I can't recall that. I wasn't involved in any of the
 12 criminal litigation, so it's unlikely that I'd have been
 13 given any information about the cases.
 14 **Q.** We'll come to that shortly. So let's put ourselves in
 15 the Legal Team. On the one hand, earlier in the year
 16 you were dealing with an issue relating to audit data
 17 for PCI?
 18 **A.** Yes.
 19 **Q.** Later in the year, there's an issue about audit data for
 20 these duplicate transactions and your evidence is that
 21 you weren't aware of this later duplicate?
 22 **A.** No, I can't recall that at all.
 23 **Q.** Pausing there, within the Legal Team, what level of
 24 discussion was there about matters between, say, the
 25 Civil Litigation Team and your team which was

14

1 need to turn this up but in page 12, paragraph 52 of
 2 your witness statement, I think your evidence is you
 3 don't recall specifically reading the May 2009 Computer
 4 Weekly article; is that right?
 5 **A.** That's right.
 6 **Q.** But you can remember hearing reference to it?
 7 **A.** Yes, and in the additional bundle of documents that
 8 I was given, I believe there's a reference to being told
 9 about in early 2010.
 10 **Q.** Can you recall about your views were of the allegations
 11 raised when you first heard of them?
 12 **A.** I think when I first heard of them it was in the context
 13 of PCI Track II and the criminal lawyer was explaining
 14 to me that criminal cases existed and there had been
 15 some noise in an article in Computer Weekly.
 16 **Q.** Can I ask, when you say the "criminal lawyer", who was
 17 that?
 18 **A.** That was, I believe, Juliet McFarlane. It's in the
 19 additional bundle of documents, I think around January
 20 2010.
 21 **Q.** So you say "some noise", was that the words used?
 22 **A.** That's my word. That would have been -- in her email
 23 she talks about there being criminal cases and that
 24 there are some allegations about the Horizon computer
 25 system.

16

1 Q. Did you take them seriously at that time?
 2 A. Yes.
 3 Q. When you said "some noise", do you think the use of the
 4 phrase "some noise" indicates that you're taking it
 5 seriously or that the complaints had merit?
 6 A. Sorry, that was just words I came out with at this point
 7 in time.
 8 Q. Do you recall around this time, so 2010/2011, whether
 9 there were any discussions of bugs, errors or defects
 10 within the Legal team, beyond the Computer Weekly
 11 article?
 12 A. So there were the allegations, I think, in terms of the
 13 civil cases and I think --
 14 Q. Are you referring to the Shoosmiths litigation?
 15 A. I'm -- I'm thinking, I think there was a Mandy Talbot
 16 email, in the additional bundle, of 7 October.
 17 Q. We'll come to some of those shortly.
 18 A. But I can't recall whether there was earlier mention of
 19 the civil cases.
 20 Q. Did Susan Crichton ever discuss bugs, errors and defects
 21 with you?
 22 A. I can't recall, no.
 23 Q. Let's look at some of the emails on the response to
 24 Horizon challenges. Can we start, please, with
 25 FUJ00156122. If we could go to page 7, please. So

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1 "In the case referred to as Cleveleys an independent
 2 expert was appointed. Unfortunately [Post Office
 3 Limited] and Fujitsu did not manage this spectacularly
 4 well and probably fielded the wrong people or at the
 5 very least insufficiently briefed people. I read the
 6 so-called expert's report and I have to say it was far
 7 from the professional effort I would have expected."
 8 Pausing there, were you aware of the Cleveleys case
 9 at the time in 2010?
 10 A. No.
 11 Q. No?
 12 A. No.
 13 Q. Did you become aware of the Cleveleys case at any point
 14 whilst you were at Post Office Limited?
 15 A. I can't recall but I don't think so.
 16 Q. If we could carry on to page 2, please. An email from
 17 Gareth Jenkins on 25 February, it says:
 18 "Suzie/Tom
 19 "Please see email trail below. This is another
 20 example of postmasters trying to get away with 'Horizon
 21 has taken my money'. Dave Smith seems to have put me
 22 forward as the expert to go to on this."
 23 Then over on page 1, please, the response says:
 24 "Gareth, I have asked JP to liaise with Hugh
 25 Flemington on this -- don't reply at the moment. I'll

19

1 an email from Mandy Talbot on 17 February 2010 to David
 2 X Smith, Head of Change and IS, at that point. Do you
 3 recall what team Mandy Talbot was in at the time?
 4 A. So she was in the Royal Mail Civil Litigation Team.
 5 Q. So separate building --
 6 A. Yes.
 7 Q. -- separate team?
 8 A. Yes.
 9 Q. Okay. It says:
 10 "Has [Post Office Limited] received requests like
 11 this [referring to the email below] and if so has it
 12 responded to them? Does the business in principle have
 13 any objection to meeting with a 'computer expert' and
 14 explaining to him how the system works. Possibly even
 15 showing him the data."
 16 If we go to, starting with the bottom of page 5, we
 17 see David X Smith's response there. Over the page it
 18 says:
 19 "As long as the argument is carried out on the level
 20 of what could happen, then we will always struggle to
 21 win it. Our greatest chance of winning the argument
 22 case by case is to fix the debate on what actually
 23 happened."
 24 It goes on to refer to two cases, the first being
 25 Cleveleys. It says:

18

1 let you know in due course how we are going to handle
 2 this."
 3 Do you recall what involvement you had with this
 4 matter, namely whether Gareth Jenkins was going to be
 5 instructed to give expert evidence.
 6 A. No, I was surprised when I saw this and I think that the
 7 Fujitsu account manager would have had my name in mind
 8 because I'd been asking about Track II and, if I'd have
 9 got contacted by JP, I'm sure I would have, once
 10 realised it was about a Mandy Talbot matter, I would
 11 have pointed him in the direction of Mandy Talbot.
 12 Q. At that point, do you recall any conversation with
 13 either Mandy Talbot or with Fujitsu, people at Fujitsu,
 14 regarding Post Office Limited's request for expert
 15 evidence?
 16 A. No. I wasn't involved in those cases and there would be
 17 no reason for me to be.
 18 Q. So your evidence is it's simply a misdirected email?
 19 A. Yes.
 20 Q. Nothing further to do with you?
 21 A. Yes.
 22 Q. Please can we go to POL00409718. So this is October
 23 2010, 7 October 2010. We've an email from Mandy Talbot,
 24 it's to Susan Crichton. We know she was sort of sitting
 25 at the top of the tree, essentially, for the Post Office

20

1 Limited matters?

2 **A.** Yeah.

3 **Q.** There's you and Jessica Madron. Do you remember who

4 Jessica Madron was?

5 **A.** She was Post Office Legal lawyer that worked on

6 subpostmaster contracts.

7 **Q.** So, at this point, was she level with you in seniority?

8 **A.** She was, I think, level with me in seniority at this

9 point. She had been there longer, much longer.

10 **Q.** She'd been there longer but, in terms of your actual

11 postings, you were level?

12 **A.** I can't recall the precise clarifications, I'm afraid.

13 **Q.** It says:

14 "Dear All

15 "We need as an organisation to determine how best to

16 deal with all the cases where allegations are being made

17 about Horizon and where there is money owed by the

18 former postmasters to the business."

19 Why were you being brought into this email at this

20 stage?

21 **A.** I don't know. I can't recall.

22 **Q.** Well, let's pause there. Mandy Talbot is in the Civil

23 Litigation Team at Royal Mail?

24 **A.** Yes.

25 **Q.** She must have an understanding of where responsibilities

21

1 **Q.** Yes. So --

2 **A.** But not me taking on civil litigation or being involved

3 with civil litigation.

4 **Q.** So is your evidence at this stage that, again, this was

5 just an email sent to you and you weren't involved in

6 insisting with Post Office Limited strategy on

7 responding to Horizon litigation?

8 **A.** Correct. I can't recall being involved in that.

9 **Q.** Sorry, you can't recall that or are you firmly saying

10 you -- well, let me rephrase that, sorry.

11 Is your evidence you can't recall being involved in

12 the response to Horizon challenges or your evidence is

13 that you're positively saying that you weren't involved?

14 **A.** I can't recall but it would be very unlikely.

15 **Q.** If you could just go down, please, to include the

16 paragraph starting "Number 1". It says:

17 "... should we wait until the conclusion of the case

18 of *Misra* which is currently going through the criminal

19 courts."

20 You said you're now aware of the case of *Misra*,

21 Seema Misra.

22 **A.** So, I was aware of the name because, right at the

23 beginning of 2010, Fujitsu emails me, probably because

24 I'd been dealing with a Track II issue, and asked me did

25 I know who was dealing with a case called *Misra*? So

23

1 lie for issues such as civil litigation within the

2 group?

3 **A.** Yes.

4 **Q.** She's emailed a relatively small distribution list of

5 three people, correct?

6 **A.** Correct.

7 **Q.** Can you explain why Susan Crichton was included in that

8 list?

9 **A.** I would assume because she was head of the POL legal

10 operation at that point.

11 **Q.** Was it actually the case that you were included because,

12 with working on the Post Office Limited team, you were

13 being involved in determining the strategy for

14 responding to Horizon challenges?

15 **A.** So I can't recall being involved in that strategy. When

16 I saw this, I thought it was possible that I'd been

17 included because we were starting to plan for

18 separation.

19 **Q.** Why would that be a reason for you to be included?

20 **A.** So, at separation, we would have to take civil

21 litigation cases on.

22 **Q.** So that's including you not in terms of advising on the

23 separation itself but almost in preparation for your

24 work to come?

25 **A.** Yes, in terms of planning for separation.

22

1 I found out who that lawyer was and I told the Fujitsu

2 lawyer who'd asked me. So that was my involvement with

3 *Misra*.

4 **Q.** Further on in this paragraph, it says:

5 "Assuming that the case is concluded within that

6 time period, some of the issues set out below will fall

7 away but if it is adjourned or we lose it the following

8 points will become relevant. *Misra* is the prosecution

9 case involving Issy Hogg, one of the lawyers used by

10 Postmasters for Justice. If the prosecution is fully

11 successful it will make the civil claims much easier to

12 deal. With if the prosecution is only partially

13 successful then it is likely to make the civil claims

14 very difficult to proceed with if we cannot rely on the

15 Horizon data."

16 Can you recall any discussion about whether the

17 *Misra* case was being used as a test case?

18 **A.** No, I can't.

19 **Q.** Can we please look at POL00055590. If we can go to the

20 bottom, please. This is an email from Mandy Talbot

21 again on the 21 October. You're first, it says, "To:

22 Hugh Flemington". It says:

23 "I have been made aware of the fact that many of us

24 are on annual leave next week because of half term. In

25 the circumstances it seems likely that we will have to

24

1 reschedule again. Please accept my apologies for this.
 2 I will get my secretary to reschedule."
 3 The subject is "Horizon".
 4 So, at this point, on 21 October 2010, so a few
 5 weeks after the email we just went to, Mandy Talbot
 6 appears to be still trying to get you to attend
 7 a meeting on Horizon.
 8 **A.** I can't recall any such meeting or going to any such
 9 meeting.
 10 **Q.** But would you accept that you were -- again, what
 11 appears to be happening is you are being -- or Mandy
 12 Talbot is trying to bring you into and involve you in
 13 discussion on Horizon matters?
 14 **A.** Yes, trying to. But I can't recall where that went.
 15 **Q.** Well, if we look up, please, to the Jarnail Singh email,
 16 this is a well-known email to the Inquiry, you received
 17 this, we can see, on 21 October. Do you recall
 18 receiving this?
 19 **A.** I do, because of the language used and the tone.
 20 **Q.** What was it about the language used and the tone that
 21 struck you?
 22 **A.** Things like the word "destroy". I thought that was
 23 emotive.
 24 **Q.** Did you think it was appropriate for a legal
 25 professional to use this language?

25

1 **A.** Yes. I think so.
 2 **Q.** Were you aware at that point that there was
 3 consideration being given for an independent auditor or
 4 expert such as Second Sight to produce a report on the
 5 system?
 6 **A.** Yes. I think I was.
 7 **Q.** Who told you about that?
 8 **A.** Susan Crichton.
 9 **Q.** So it's arranged to consider, we see, Horizon
 10 litigation, and it says:
 11 "The proposal to instruct an independent expert to
 12 prepare a report on the Horizon system is the highest
 13 risk response to the issue."
 14 Now, at this point, there's also civil litigation
 15 potentially in the frame from Shoosmiths.
 16 **A.** Mm-hm.
 17 **Q.** Can you recall if this paragraph is referring to
 18 an independent expert such as Second Sight or the Second
 19 Sight exercise, or is this is an independent expert to
 20 address the specific civil proceedings brought against
 21 Post Office Limited?
 22 **A.** I couldn't recall.
 23 **Q.** You say in your statement -- we don't need to bring up
 24 it up on the screen but it's page 15, paragraph 56, and
 25 this was in September 2011, I should say -- the

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1 **A.** I thought it was over the top.
 2 **Q.** This is an email -- as you see, it says, "Marilyn
 3 Benjamin on behalf of Jarnail Singh". Were you aware of
 4 Jarnail Singh as a lawyer at that point?
 5 **A.** No, other than his name when I provided it to Fujitsu
 6 back in 2010.
 7 **Q.** Did you form a view about Jarnail Singh at this time?
 8 **A.** No, I would have just thought it's an email which uses
 9 emotive language. So I'd have been surprised by it but
 10 I wouldn't have formed a view on him.
 11 **Q.** We see Ms Talbot was trying to organise some sort of
 12 meeting about Horizon. Following this email, in the
 13 weeks following, can you recall whether Ms Talbot tried
 14 to rearrange the meeting again or did that trail run
 15 cold?
 16 **A.** I can't recall at all. I believe she may have left the
 17 business shortly in 2011.
 18 **Q.** Please can we bring up POL00006484. This is a note of
 19 conference at Maitland Chambers with Richard Morgan QC,
 20 as he was. Susan Crichton and you are listed in
 21 attendance from Post Office Limited. Do you have any
 22 recollection of this conference?
 23 **A.** I vaguely recall it, yes.
 24 **Q.** This was before the announcement of the Second Sight
 25 investigation?

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1 understanding at Royal Mail Group and Post Office at
 2 that time was that the system was robust, so it was
 3 logical and important that these claims be defended;
 4 that's your evidence?
 5 **A.** Right.
 6 **Q.** On what basis did you understand the system to be robust
 7 at this stage?
 8 **A.** Was that -- did you say September 2011.
 9 **Q.** That was September 2011, yes.
 10 **A.** So there had been, I think at that point, possibly the
 11 Rod Ismay report on the system.
 12 **Q.** Pausing there, did you see the Rod Ismay report?
 13 **A.** I can't recall seeing that, no.
 14 **Q.** Well, if you can't recall seeing it how do you know if
 15 that was the basis --
 16 **A.** It would have been, I think, talked about.
 17 **Q.** It was talked about?
 18 **A.** Yes.
 19 **Q.** Yes?
 20 **A.** And the message was from, I think, the Civil Litigation
 21 Team that the system was robust -- from the CIO team,
 22 that the system was robust.
 23 **Q.** So your basis for believing the system was robust came
 24 from colleagues telling you as such?
 25 **A.** Yes, I'm trying to recall if there was any further

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1 detail. I think it was the stance at the business that
 2 it was robust.
 3 **Q.** We've seen a couple of occasions here referring to
 4 an independent expert and the documents I took you to
 5 before, members of the Legal Team considering whether
 6 independent expert evidence was necessary or desirable,
 7 correct?
 8 **A.** Do you mean in terms of the conference with counsel in
 9 2012 here?
 10 **Q.** Well, yes, here and the documents I took you to earlier,
 11 which showed querying whether an expert input was
 12 required, the emails from Mandy Talbot.
 13 **A.** Yes, sorry, yes.
 14 **Q.** Why was the Legal Team considering whether expert
 15 evidence was required on a regular basis?
 16 **A.** I don't know. I don't know. I wasn't involved with
 17 those Civil Litigation Team or the Criminal Team. So
 18 how they were approaching it was very much down to them.
 19 **Q.** At this point, when you are involved in the conference,
 20 what, if any, internal investigation did the Legal Team
 21 do to understand what documents Post Office Limited held
 22 that were relevant to the issue of whether Horizon was
 23 robust or not?
 24 **A.** I can't recall, but Mr Singh and Susan Crichton were
 25 running the criminal litigation at that time, so I would

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1 **Q.** Please can we turn to POL00107760. If you could go down
 2 the page, please. This is an email from Jason G
 3 Collins; do you remember who that was?
 4 **A.** No.
 5 **Q.** 10 August 2012, he says:
 6 "Are speaking with Andy Garner today ..."
 7 Do you remember who Andy Garner was?
 8 **A.** No, I remember the name but not who he was.
 9 **Q.** "... I asked him to draw together the email below to
 10 enable me to forward to you for sight/advice. My
 11 understanding is that all matters 'Horizon' should pass
 12 through you before any agreed actions to support wider
 13 activity is made."
 14 Were you, at this point, the point of contact,
 15 essentially, in the Legal Team for Horizon matters?
 16 **A.** Not that I can recall, I was surprised when I saw this
 17 email, because I cannot remember being badged as such.
 18 **Q.** Can you explain why Mr Collins would have been
 19 misunderstood on that issue?
 20 **A.** He may have been given a mis-steer by Mr Garner. I had
 21 worked with Mr Garner before. I can't remember in what
 22 context but he would know me, so he might have thought
 23 that he was -- I was the person he knew in the Legal
 24 team and that Jason should reach out to me.
 25 **Q.** Was there a sin point of contact for Horizon issues at

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1 have expected them to consider that issue.
 2 **Q.** So that's their issue, you say, not for you. So why
 3 were you attending the conference, then, if it wasn't
 4 for you?
 5 **A.** I think I'd been asked by Susan Crichton to turn up at
 6 the conference, possibly because she wanted another
 7 view. We only had a Bond Dickinson secondee who was
 8 doing civil litigation, possibly also because it was the
 9 holiday season and, therefore, Second Sight might be
 10 appointed shortly and she wanted coverage, someone else
 11 who knew what the issues were.
 12 **Q.** Did you turn your mind to thinking whether you should
 13 look for documents held by Post Office that were
 14 relevant to the integrity of the Horizon IT System?
 15 **A.** I would have assumed that Mr Singh was dealing with that
 16 and doing that very thing.
 17 **Q.** At that time, were you aware of a Problem Management
 18 Team within Post Office Limited?
 19 **A.** Sorry, could you repeat the question?
 20 **Q.** Were you aware of the Problem Management Team within
 21 Post Office Limited?
 22 **A.** I can't recall that no.
 23 **Q.** Did you have any knowledge of something called the KEL
 24 database or the Known Error Log?
 25 **A.** No.

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1 this time, within the Legal Team?
 2 **A.** I can't recall, sorry.
 3 **Q.** Could we look, please, at POL00 -- sorry, sir?
 4 **SIR WYN WILLIAMS:** Yes, by this time, of course,
 5 Mr Flemington, separation had occurred, had it not?
 6 **A.** Yes, that was on 1 April.
 7 **SIR WYN WILLIAMS:** So no doubt there were processes being
 8 put in place for dealing with these issues within Post
 9 Office Limited, as opposed to Royal Mail?
 10 **A.** Yes, I believe so. Unfortunately, my father passed away
 11 unexpectedly on 1 April, so the first three or four
 12 weeks I wasn't around in the business.
 13 **SIR WYN WILLIAMS:** Well, I'm sorry to have heard that but
 14 I wasn't being critical; I was just seeking
 15 an explanation for why you may have been included in
 16 things because this was all new, in reality, wasn't it?
 17 **A.** Well, I was about to say that Susan Crichton and Jarnail
 18 Singh would have been sort of working up and setting up
 19 the criminal prosecution side of things in those few
 20 weeks. I know that there had been some of the MPs
 21 reaching out by this time and that was driving
 22 a discussion about would a Second Sight sort of
 23 independent review be created.
 24 And, as I said, I was surprised when I saw myself
 25 being badged in this email as "all matters Horizon

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1 should go through Hugh". It may have been they were
2 aware that I was being involved in the Second Sight
3 thing, such as the conference with counsel, by Susan
4 Crichton.

5 **SIR WYN WILLIAMS:** Well, it may be no more and no less than
6 you were the Head of Legal, officially, and Susan
7 Crichton was your boss and she's copied into it.

8 **A.** Yes, yeah.

9 **SIR WYN WILLIAMS:** All right. Fine.

10 **MR STEVENS:** So rounding off those emails, Mr Flemington,
11 that you've been taken to, we see in your evidence,
12 actually, it's page 5, paragraph 21, please -- thank
13 you -- you say:

14 "My involvement with Horizon was initially sporadic
15 and peripheral ..."

16 You refer to a specific example there relating to
17 resourcing for Jon Longman. You say:

18 "... sporadic and peripheral ... until the ... end
19 of June 2013 when, before going on sabbatical from
20 12 July to around 3 September ... I became involved in
21 the response to emerging issues regarding Horizon."

22 So, having gone through those documents -- just to
23 summarise -- your evidence is, whilst you may have been
24 copied in on various things or taken to conference, you
25 weren't involved, actually, in the strategy --

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1 of Jarnail Singh?

2 **A.** Yes.

3 **Q.** I want to just go over a couple of issues on your
4 knowledge of criminal law. Presumably you were aware of
5 the criminal standard of proof, convincing the jury such
6 that it's sure of guilt?

7 **A.** So, in terms of the criminal side of criminal cases to
8 be taken by POL Legal, I had already agreed with Susan
9 Crichton that, because I had no knowledge of criminal
10 law, I felt unable to supervise Jarnail Singh on
11 criminal matters.

12 **Q.** I will come to that in a moment but, if we can just go
13 through what your knowledge of criminal -- a few matters
14 of criminal law. Firstly, were you aware that Post
15 Office Limited, if it brought a prosecution, had to
16 convince a jury such that it was sure of guilt?

17 **A.** I was aware that we would have certain duties but I was
18 totally reliant on Mr Singh advising correctly on those.

19 **Q.** Okay, I'll ask it again. Were you aware of the criminal
20 standard of proof --

21 **A.** I cannot recall being specifically aware of that.

22 **Q.** You say you were aware of certain duties. Presumably
23 you would have known that there was a duty of disclosure
24 on Post Office when it prosecuted cases?

25 **A.** I recall a duty of disclosure being talked about by

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1 **A.** No.

2 **Q.** -- of responding to Horizon matters?

3 **A.** It was a very *ad hoc* engagement.

4 **Q.** Secondly, at least following separation at least, your
5 evidence is that responsibility lay within the Legal
6 Team --

7 **A.** Yes.

8 **Q.** -- with Susan Crichton and Jarnail Singh?

9 **A.** Yes.

10 **Q.** Thank you. That can come down, thank you. I want to
11 look at a different topic now and it's the issue of how
12 criminal matters were dealt with in the department. You
13 say candidly in your witness statement that you had very
14 little civil litigation experience?

15 **A.** Mm-hm.

16 **Q.** Did you have any criminal litigation experience?

17 **A.** No.

18 **Q.** Presumably you were aware or you say you became aware,
19 sorry, of prosecutions being made by Post Office in 2010
20 or 2011?

21 **A.** It's 2010, it's mentioned. It's that Track II PCI.

22 **Q.** So it's that point when you're aware, yeah?

23 **A.** Yeah, but literally of their existence, not any detail.

24 **Q.** When we get to 2012 and separation, we'll come to the
25 precise scope of it, but you take over line management

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1 Mr Singh or mentioned by Mr Singh in relation to the
2 context of criminal cases.

3 **Q.** Did you understand that Post Office was required to
4 disclose documents it possessed or had access to that
5 might reasonably be considered capable of undermining
6 the case for the prosecution or of assisting the case
7 for the accused?

8 **A.** I can't recall what specific knowledge I had on the
9 criminal cases.

10 **Q.** Were you aware that Post Office owed a duty of
11 disclosure following conviction?

12 **A.** Again, I can't recall specific awareness.

13 **Q.** Let's turn -- well, actually, you've said it in
14 evidence, we don't need to turn there, but your evidence
15 on supervision of Jarnail Singh is that you would
16 effectively deal with normal management issues, as you
17 put it?

18 **A.** Yes.

19 **Q.** You say it's matters like annual leave and salary
20 reviews?

21 **A.** Yes.

22 **Q.** But criminal prosecutions, you say those were supervised
23 by Susan Crichton?

24 **A.** Yes.

25 **Q.** Were you aware of what experience in criminal law Susan

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1 Crichton had?
 2 **A.** I wasn't, no.
 3 **Q.** So, at this point, Susan Crichton, was she responsible
 4 for the entire Legal Department?
 5 **A.** Yes. She was effectively the *de facto* GC.
 6 **Q.** So a much wider remit than you?
 7 **A.** Yes.
 8 **Q.** Ms Crichton's evidence was that she had no criminal law
 9 experience. In those circumstances, why would she agree
 10 to supervise Mr Singh's work?
 11 **A.** I don't know why she decided to but she did decide.
 12 **Q.** To are you aware of how Ms Crichton supervised
 13 Mr Singh's work?
 14 **A.** No.
 15 **Q.** Was, in effect, Mr Singh left to run the prosecutions
 16 independently, based on what you're saying, without
 17 supervision?
 18 **A.** I couldn't comment on that because I don't know what
 19 interaction there was between Susan Crichton and
 20 Mr Singh over the criminal prosecutions.
 21 **Q.** Can we turn, please, to POL00141439. If we could start
 22 with page 3, please -- sorry, page 2, my apologies, the
 23 bottom of page 2.
 24 So we see this is an email from John Scott to
 25 Jarnail Singh, into which you're copied.

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1 rationale of why to prosecute or not, or a caution in
 2 this particular instance."
 3 We don't need to see the rest -- actually, we can go
 4 over, please, to the top of page -- thank you. We see
 5 it says:
 6 "Cartwright King solicitors have set a benchmark in
 7 terms of reporting and substance of advice and, for
 8 consistency purposes, to ensure decision making is
 9 robust, fair and consistent, this level needs to be
 10 maintained."
 11 If you can go back to page 2, please. Just slightly
 12 down, please. Thank you. We see you remain in copy,
 13 Jarnail Singh comes back with a few comments and we see
 14 John Scott's reply immediately above. It says:
 15 "When we discussed this yesterday before I saw the
 16 papers you were critical of CK overplaying their writeup
 17 (I acknowledge they are commercial and would wish to
 18 increase their opportunity). You were defensive of your
 19 position, failed to listen and struggled to take on
 20 board learning improvements. I keep with my statement
 21 below that CK are the benchmark and you've failed to
 22 meet it (whether or not this is suitable for
 23 caution/prosecution or vice versa and with [Cartwright
 24 King]).

25 "I now have concerns in the overall management of

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1 **A.** Mm-hm.
 2 **Q.** Do you remember who John Scott was?
 3 **A.** He was the Head of Security, I believe.
 4 **Q.** What working relationship did you have with him?
 5 **A.** So he would have been, I think at the time, reporting
 6 into Susan Crichton, as I was.
 7 **Q.** Sorry, I missed that?
 8 **A.** Sorry, I think at the time he was reporting into Susan
 9 Crichton alongside me -- myself.
 10 **Q.** So did you have any working relationship with him?
 11 **A.** A little but not a lot.
 12 **Q.** Do you remember on what areas you would work with
 13 Mr Scott?
 14 **A.** Only on something like this, if he would appear and make
 15 a comment about someone like Mr Singh.
 16 **Q.** We see it says:
 17 "Jarnail
 18 "Thanks. Can you sent your report ..."
 19 So he's referring to an advice on caution:
 20 "... with the whole file please, as I like to see
 21 the full officer's report, taped interview notes, etc."
 22 Next paragraph says:
 23 "Your report is also very brief advising a caution
 24 and has not sufficiently outlined the case, supporting
 25 evidence, discussion around defence options and the

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1 this part of the process."
 2 Why did that criticism of Mr Singh's work come to
 3 you?
 4 **A.** I can't say why it came to me, other than John Scott
 5 knew me and knew to speak to me.
 6 **Q.** But he would know to speak to Susan Crichton, wouldn't
 7 he, if it was known that she was supervising Mr Singh?
 8 **A.** I think he may not have wanted to have raised this in
 9 the first instance with Susan Crichton. I remember
 10 I went round and spoke to Susan Crichton about this
 11 because I thought it was a criticism that would be
 12 levelled at her, not me, and I remember, I think, John
 13 Scott -- it was discussed with John Scott and it was
 14 discussed with Mr Singh, in terms of what might have
 15 gone wrong, what could be done differently, et cetera.
 16 But this was all with Susan Crichton.
 17 **Q.** So your evidence is you have a specific recollection of
 18 discussing this with Susan Crichton?
 19 **A.** Yes.
 20 **Q.** To what extent were you involved in providing advice or
 21 anything else on the substance of Mr Singh's work at
 22 this point?
 23 **A.** This was probably one of the only points when I got
 24 drawn into that.
 25 **Q.** What did you advise or tell Mr Singh to do in respect of

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1 this?

2 **A.** I can't remember the specifics of where it came out but
3 I know the matter was thrashed out.

4 **Q.** Were you concerned with Mr Singh's competence at this
5 point?

6 **A.** So, at this point, the context for me, I suppose, was
7 that Mr Singh had been as a criminal lawyer in Royal
8 Mail Group for 17 years so he was quite a senior
9 practitioner, he'd been recommended by Rob Wilson.
10 I remember early on he'd mentioned, after separation,
11 that he was organising training for the Investigators
12 and I remember that involved Cartwright King, and
13 I remember Cartwright King, after that, saying to me he
14 was competent.

15 So there were various pointers which said to me,
16 actually, you know, he's -- he knows what he's doing.
17 He's been there a long time. He wouldn't have survived
18 at Royal Mail for 17 years without knowing what he was
19 doing. If I had any concerns, like the one raised by
20 John Scott, I would have flagged it to Susan Crichton.
21 But that's the only one I can remember.

22 **Q.** Did you discuss with Susan Crichton whether Mr Singh was
23 being appropriately supervised?

24 **A.** I can't recall whether that discussion happened.

25 **Q.** This is quite a serious criticism from the Head of

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1 Northern Ireland or Scotland?

2 **A.** I can't recall specifically, no, although, at some
3 point, it would have been alluded to and talked about in
4 the context of this whole Horizon issue.

5 **Q.** In the -- sorry, in --

6 **A.** In the context of the whole Horizon issue and dealing
7 with the emerging Horizon issue.

8 **Q.** Are you talking after Second Sight's report, when you
9 say that?

10 **A.** Possibly, that's where I'm thinking, yes.

11 **Q.** Do you know how the Post Office Legal Team satisfied
12 itself that it was acting in compliance with the law of
13 Scotland, insofar as it brought prosecutions?

14 **A.** Not *per se*, no. That would have been something that
15 I would have assumed that Susan Crichton and Mr Singh
16 were dealing with.

17 **Q.** Do I take it from that that the same applies for
18 Northern Ireland as well?

19 **A.** Yes.

20 **Q.** I'm going to jump forward in the chronology, just whilst
21 we are here. Are you aware of any steps Post Office
22 took to raise issues of Horizon integrity with the
23 Procurator Fiscal --

24 **A.** Not specifically that I can recall, no.

25 **Q.** -- or the Public Prosecution Service?

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1 Security, would you accept that?

2 **A.** It is but I remember at the time feeling that it was
3 slightly personal, that there was something -- some
4 personal animosity between John Scott and Jarnail Singh.

5 **MR STEVENS:** Sir, that's probably a good time to take the
6 first morning break, if we can come back at 11.00.

7 **SIR WYN WILLIAMS:** Certainly.

8 **MR STEVENS:** Thank you, sir.

9 (10.49 am)

10 (A short break)

11 (11.00 am)

12 **MR STEVENS:** Good morning, sir, can you see and hear me
13 again?

14 **SIR WYN WILLIAMS:** I can, thank you.

15 **MR STEVENS:** Thank you.

16 Mr Flemington, I want to ask you a few questions
17 about the Legal team in Post Office Limited's approach
18 to the devolved nations. Was anyone in the Post Office
19 Legal team qualified in Scots Law --

20 **A.** Not that I recall.

21 **Q.** -- or the law of Northern Ireland?

22 **A.** Not that I recall.

23 **Q.** At any point when you were at Post Office Limited, did
24 you have a discussion with anyone in the Legal team
25 about how Post Office Limited handled prosecutions in

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1 **A.** No.

2 **Q.** You say in your witness statement that you weren't
3 involved in the instruction of Cartwright King --

4 **A.** Mm-hm.

5 **Q.** -- Cartwright King being an external firm that Post
6 Office Limited relied on for legal advice in relation to
7 criminal matters?

8 **A.** Yes.

9 **Q.** Do you know who did instruct Cartwright King?

10 **A.** I had understood it was Mr Singh or Susan Crichton.

11 **Q.** Did you take any steps to understand or satisfy yourself
12 as to what Cartwright King's retainer was or its
13 instructions?

14 **A.** I think I would have asked about its retainer on the
15 return to the office after my -- the burial of my
16 father. It would have been at that point I probably
17 would have looked to see what retainer letter,
18 et cetera, was in place.

19 **Q.** Do you recall, in broad terms, what they were retained
20 to do --

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

22 **Q.** Is this another matter that you say would fall to Susan
23 Crichton and Jarnail Singh?

24 **A.** Yes.

25 **Q.** Womble Bond Dickinson was another firm instructed by

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1 Post Office Limited.
 2 **A.** Yes.
 3 **Q.** When I say Womble Bond Dickinson, I include Bond
 4 Dickinson and Bond Pearce, et cetera.
 5 **A.** Mm-hm.
 6 **Q.** Chris Aujard gave evidence that Womble Bond Dickinson
 7 were, at times, like an extension of the in-house Legal
 8 Team for Post Office Limited; would you agree with that?
 9 **A.** I could see that he might think that, if he's dealing
 10 with a particular partner on a regular basis, for
 11 example, or a particular fee-earner from Womble Bond
 12 Dickinson on a regular basis, in the context of
 13 something like Horizon, purely because there were
 14 moments when they were probably providing a lot of
 15 support to us.
 16 **Q.** In terms of Horizon, what was your working relationship
 17 with Womble Bond Dickinson?
 18 **A.** In terms of Horizon issues, I would have dealt with
 19 them -- I would have dealt with them when they were
 20 engaged on Horizon issues, to the extent I was also
 21 engaged on that particular Horizon issue. So, for
 22 example, in the 2012 QC con, I believe that might have
 23 been arranged with their help and then, in the emerging
 24 issue the following year in July, they were obviously
 25 involved to a degree in that, and so was I, so I would

1 paragraph 255 of WITN00220100. Her evidence was:
 2 "At some point around the time of the separation,
 3 I made it clear, including to the Security Team, that no
 4 further prosecutions were to be commenced which were
 5 reliant on Horizon evidence."
 6 Do you recall that instruction being given?
 7 **A.** No, I don't.
 8 **Q.** Can we look, please, at POL00180855. So if we could
 9 turn to the bottom of page 2, please, we have an email
 10 from Rachael Panter right at the bottom, about the case
 11 of *Wylie*. It says:
 12 "As anticipated, please see attached letter from
 13 defence solicitors in *Wylie* asking for our position on
 14 the ongoing Horizon investigation."
 15 That's relating to Second Sight, isn't it?
 16 **A.** Yes, yes.
 17 **Q.** If we can go up, please, slightly to the email from
 18 Jarnail Singh -- thank you -- it says:
 19 "Hugh/Susan -- please see Cartwright King's email.
 20 I raised this with you and briefly discussed this with
 21 Hugh last week with our possible approach ..."
 22 I think you say in your witness statement that you
 23 have no recollection of that discussion; is that
 24 correct?
 25 **A.** That's correct.

1 have been involved speaking to them about things then.
 2 **Q.** Did you think the level of reliance on Bond Dickinson
 3 was appropriate or usual for a business such as Post
 4 Office Limited?
 5 **A.** I didn't at the time think it was unusual or feel it was
 6 unusual. We were a growing team. We were originally
 7 four, we'd grown to about 12. We weren't allowed to
 8 grow more at that point because there were restrictions
 9 on the HR template.
 10 **Q.** When you say HR template, is that in terms of headcount?
 11 **A.** In headcount, yeah. So you had to still maintain
 12 a degree of externalisation to help support on
 13 day-to-day matters.
 14 **Q.** I want to look at some topics now to do with the Second
 15 Sight investigation, starting with the effect on
 16 prosecutions. Did you receive any instructions about
 17 whether or not to continue prosecutions -- sorry, I'll
 18 rephrase that.
 19 Do you recall receiving any instructions about
 20 whether or not Post Office Limited should continue
 21 prosecutions of subpostmasters based on Horizon data,
 22 once the review by Second Sight had been announced?
 23 **A.** I can't recall, no. Not specifically.
 24 **Q.** Susan Crichton gave evidence in her witness statement,
 25 which we don't need to turn up but, for the record, it's

1 **Q.** Well, just pausing there, in your career, you handed
 2 really dealt with criminal law matters before?
 3 **A.** Not at all, no.
 4 **Q.** So, at this point, you're being brought into discussions
 5 about Post Office's position on whether to continue
 6 prosecutions pending an investigation by Second Sight --
 7 **A.** Correct.
 8 **Q.** -- and there would be severe ramifications for the
 9 business if Second Sight uncovered any systemic
 10 problems?
 11 **A.** Yes, correct.
 12 **Q.** So it's a high-stake situation?
 13 **A.** Yes.
 14 **Q.** It was an unusual moment in your career; would you
 15 agree?
 16 **A.** It was interesting.
 17 **Q.** Is it really your evidence that you can't remember your
 18 discussion with Jarnail Singh around this time?
 19 **A.** No, because my -- I can't recall but, because I wasn't
 20 involved in the prosecutions, my suspicion would be that
 21 I would have said this needs to be discussed with Susan.
 22 **Q.** Well, if we look, you are involved, still --
 23 **A.** Yes.
 24 **Q.** -- now in the decision making, yes?
 25 **A.** Yes.

1 Q. If we go to page 1, please. To the bottom. Sorry,
 2 that's fine, thank you. Some other emails, and Jarnail
 3 Singh comes back on 10 July, this time just to you --
 4 A. Mm-hm.
 5 Q. -- saying:
 6 "Hugh, what we say to ..."
 7 Then 3 and 4 is:
 8 "Do we agree to defendants request for stay or
 9 adjournment pending completion of the audit report or
 10 let the court decide.
 11 "What are we going to do with existing, pending and
 12 future investigations and losses ..."
 13 So, effectively, he's asking for guidance on Post
 14 Office's position --
 15 A. Yes.
 16 Q. -- on prosecutions --
 17 A. Yeah.
 18 Q. -- during --
 19 A. Yeah.
 20 Q. -- the Second Sight investigation?
 21 A. Yeah.
 22 Q. If we see at the bottom there, he's specifically taken
 23 out Susan Crichton out of copy, hasn't he?
 24 A. Yes.
 25 Q. Why would he do that if you weren't supervising on

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1 have been one of my earliest experiences of him and I'm
 2 looking at this chain, I've been drawn into it, I've
 3 told him before: "Actually, you're working with Susan
 4 Crichton on these matters". I'm trying to make
 5 constructive points and move it along.
 6 I'm probably getting frustrated at this point. I've
 7 got other matters I'm dealing with. So it would be more
 8 like frustration over this particular moment than
 9 anything larger around Mr Singh.
 10 Q. So did you remain satisfied that Jarnail Singh was
 11 an appropriate person to be dealing with this issue in
 12 criminal prosecutions?
 13 A. So I would have discussed any concerns I had with Susan
 14 Crichton about Mr Singh. I can't recall, on the back of
 15 this, whether or not I discussed any concerns.
 16 Q. I'm going to go to Harry Bowyer's advice of 11 July 2012
 17 now, so just after this email chain. Before I do,
 18 I understand it that you accept that you received and
 19 read this advice by 16 July 2012; is that right?
 20 A. Yes.
 21 Q. Thank you. Well, we can go straight to the advice then,
 22 please. It's POL00026567. You see it's an advice in
 23 the case of *the Crown v Wylie*, and it sets out the facts
 24 of the allegations. We can go down, please, to
 25 paragraph 2. Thank you. It's referring in

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1 criminal law matters?
 2 A. So I don't know because occasionally, sporadically he
 3 would copy me in on criminal law matters, I would remind
 4 him that he should be dealing with Susan on them.
 5 I took a pragmatic approach, which is, if there was
 6 anything I could progress to move matters along, then
 7 I would. But, most of the time when he did this, it
 8 would end up being -- going to get Susan in a discussion
 9 with Jarnail over the issue.
 10 Q. If we can go up the chain, please. We see you say:
 11 "Okay are you able to advise Susan and I or do you
 12 want this to go to counsel?"
 13 He says:
 14 "Hugh -- if I can have some answers, steer and
 15 stance, I can then [I think it should be 'advise']
 16 Cartwright King and have input from them."
 17 A. Mm-hm.
 18 Q. If we go further up, please, you say -- this is now to
 19 Susan Crichton:
 20 "He doesn't seem to be able to do recommendations,
 21 does he ..."
 22 Were you having concerns about Mr Singh's competence
 23 at this point?
 24 A. I think this was about my first dealing with Mr Singh,
 25 after separation, after he'd arrived. So this might

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1 paragraph 2 -- we don't need to read it out -- but it's
 2 referring to the Second Sight investigation and the
 3 ramifications Mr Bowyer thought that caused.
 4 Paragraph 3, please. It says:
 5 "The first consequence is that we have now given
 6 ammunition to those attempting to discredit the Horizon
 7 system. The argument will be that there is no smoke
 8 without fire and we would not have needed to audit
 9 a bomb proof system. We can expect this to go viral in
 10 that any competent defence solicitor advising in a case
 11 such as this will raise the integrity of the Horizon
 12 system and put us to proof as to its integrity. As all
 13 of our cases depend on the system to compute the alleged
 14 losses this is likely to affect a considerable
 15 percentage of our cases."
 16 So what were your thoughts, when you read that
 17 paragraph?
 18 A. I suppose it's essentially flagging the idea that Second
 19 Sight being appointed might end up with a lot of claims
 20 against the Post Office, if they find particular issues
 21 with Horizon. It's similar to -- I think it's mentioned
 22 as "floodgates" in the Morgan conference advice, and
 23 I remember thinking at the time that, once you had
 24 instructed Second Sight to do an independent review,
 25 there were two logical outcomes: either it would find

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1 nothing or it would find something and you would have to
2 deal with the consequences. So, for me, that was always
3 a logical possibility.

4 **Q.** When you thought about that, did you turn your mind to
5 what should happen in between, so what should happen to
6 criminal cases whilst the investigation was ongoing?

7 **A.** No, because I saw that as for Susan Crichton and
8 Mr Singh to make a decision on.

9 **Q.** We'll come back to that point shortly. If we could go
10 down, please, to paragraph 6(i). This is the advice
11 Mr Bowyer gives on what to do, on next steps. It says:

12 "We should identify the contested cases, civil and
13 criminal, in which the Horizon system has been
14 challenged. We should identify the areas of challenge
15 and how we neutralised them."

16 So advising, effectively, a looking-back exercise of
17 past times when the Horizon IT System had been
18 challenged, correct?

19 **A.** Yes.

20 **Q.** When you read this, did you consider whether Post Office
21 should have reviewed whether there was any material that
22 may assist the defence in those past cases?

23 **A.** I would have expected Mr Singh and Susan Crichton to
24 already have been looking at that as part of the ongoing
25 prosecution of the cases.

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1 to page 2 -- thank you -- and to the bottom, please.
2 Jarnail Singh's email of 16 July 2012 to Andy Cash,
3 Cartwright King, and you are copied in with Susan
4 Crichton.

5 **A.** Mm-hm.

6 **Q.** It refers to the defence approach to staying of
7 prosecutions until the review is completed. It says:
8 "Post Office view is that such an approach [would]
9 be resisted. Review to be conducted is limited in scope
10 in few and isolated cases."

11 It goes on to say:

12 "There are no legal or forensic grounds to argue
13 defendants will not get fair trial or abuse of process.
14 There is no reason to justify the case being stayed."

15 If we can go over the page, please, to page 1, down
16 slightly, it's an email from you, 16 July 2012, Jarnail
17 Singh, Susan Crichton and Alwen Lyons in copy. It says:

18 "One for our 3.30 meeting I think."

19 Presumably that's referring to the decision on
20 whether to oppose or agree to applications for stays
21 made by defendants?

22 **A.** Yes, this may have been the case that we already had
23 a meeting scheduled on something else and so I'm saying,
24 okay, this issue has come up, I've tried to distil down
25 on this email what the things are for discussion, and

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1 **Q.** So, effectively, you thought it wasn't your
2 responsibility?

3 **A.** No, because I wasn't dealing with those cases and
4 I didn't have supervision or carriage of them.

5 **Q.** If we could carry on over the page, please. It says:

6 "An expert should be identified and instructed to
7 prepare a generic statement which confirms the integrity
8 of the system and why the attacks so far have been
9 unfounded. This expert should be deployed in all cases
10 where the Horizon system is challenged and he should be
11 prepared to be called to reply to defence experts on
12 a case-by-case basis."

13 Did you agree with that advice?

14 **A.** I wouldn't have had the experience or the expertise to
15 disagree with it.

16 **Q.** So you didn't think, for example, that, actually, it was
17 a Post Office duty to investigate cases on
18 a case-by-case basis to see if there was a problem in
19 the Horizon IT System in that particular case?

20 **A.** So I would have been expecting and relying on Mr Singh
21 and his expertise, and Ms Crichton's supervision of the
22 criminal matters, to ensure that all that was done
23 properly.

24 **Q.** Well, let's look at some of the emails surrounding this
25 time, please. It's POL00141400, please. If I can turn

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1 then a discussion can be had on it.

2 **Q.** So you're involved in the decision making at this point?

3 **A.** I wouldn't have been involved in the decision making;
4 I would say that I was facilitating a discussion at this
5 point. I've been reached out to by Jarnail Singh, not
6 of my doing. I'm trying to progress the matter in
7 a sensible way but I'm making sure that, ultimately,
8 there's a discussion between Jarnail Singh and Susan
9 Crichton.

10 **Q.** Why did it require you to facilitate a discussion
11 between the General Counsel and someone you say is being
12 supervised by her?

13 **A.** It was a point of frustration from time to time that
14 I would have with Mr Singh.

15 **Q.** What, can you expand on that, please?

16 **A.** Because he would email me or include me in an email and
17 I would say "Jarnail you're meant to be doing the
18 criminal cases with Susan Crichton, please".

19 **Q.** Did you ever approach Susan Crichton and say, "Please
20 can you exercise more oversight of Jarnail Singh because
21 he keeps emailing me"?

22 **A.** I recall flagging the issue to her and saying, "I keep
23 getting copied into things".

24 **Q.** Do you recall what was discussed at the meeting at 3.30
25 on 16 July 2012?

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- 1 **A.** I can't, no.
- 2 **Q.** Please can we turn to POL00058155. If you can go to
3 page 2, please, and to the bottom, please. Thank you,
4 that's perfect. So this is an email from you to Susan
5 Crichton on 24 July, forwarding an email about a week
6 earlier from Jarnail Singh, and you say:
7 "This is the story text which J [presumably Jarnail]
8 put together following our meeting last week. Any
9 comments [please] before we release it?"
10 Do you remember the background to this?
11 **A.** I think this was in relation to the appointment of
12 Second Sight and explaining why Post Office had
13 appointed Second Sight, and so I think Mr Singh will
14 have involved me originally because he will have known
15 that I would have been drawn into the Second Sight issue
16 by Susan Crichton so, for example, you see me going to
17 that con with counsel. So I'm reached out to, he
18 obviously needs to put a draft statement together, and
19 this is the progression of that statement.
20 **Q.** This is quite a significant time for Post Office
21 Limited's Legal Team, isn't it?
22 **A.** In the sense of?
23 **Q.** In the sense that it's dealing with a how to progress
24 prosecutions in the face of the Second Sight
25 investigation?

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- 1 If we go down, please. At the bottom, we see the
2 sentence:
3 "When the system has been challenged in criminal
4 courts, it has been successfully defended."
5 Which was taken from Mr Singh's draft of the copy as
6 well.
7 Did you take any steps to satisfy yourself that that
8 was accurate?
9 **A.** I can't recall.
10 **Q.** Do you think you should have done?
11 **A.** I would have been relying on Mr Singh and Ms Crichton to
12 run the prosecutions in an appropriate manner, so if
13 that was required, then I would have expected them to be
14 doing that.
15 **Q.** This is slightly different, isn't it, from running the
16 prosecutions. This is a statement on the position in
17 respect of Second Sight, and it's one on which you've
18 become involved. Did you not think it was incumbent on
19 you to check that this was accurate?
20 **A.** So I would have been relying, I suppose, on people who
21 have pulled this together.
22 **Q.** Were you aware of the acquittals following trial in
23 criminal proceedings of Maureen McKelvey and Suzanne
24 Palmer at this stage?
25 **A.** No.

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- 1 **A.** Yes, although there were lots of important moments along
2 the way.
3 **Q.** But is it the case that you were actually being brought
4 into this because it was an important matter for the
5 Post Office Legal team to deal with?
6 **A.** I'm not sure that was the case. It might have been more
7 *ad hoc* than that.
8 **Q.** Sorry, can you repeat the last bit?
9 **A.** It might have been more *ad hoc* than that, in that I'd
10 been involved by Jarnail at the start of the email
11 conversation, and it snowballed from there.
12 **Q.** If we go to page 2, please. We see there the signature
13 is from Ronan Kelleher, Head of PR and Media at Post
14 Office Limited. Do you know why a PR person was brought
15 in for this?
16 **A.** No, and I can't recall their name.
17 **Q.** The last sentence -- actually, no, in fairness to you,
18 I should show you the start of the email, please --
19 thank you -- it says:
20 "As this [email] will most probably find its way
21 into the media, we do need to get the message across
22 [from', it should be] the start that we continue to
23 have full confidence in the robustness of the Horizon
24 system and then reinforce it so I suggest the following
25 tweaking to the proposed wording from Jarnail ..."

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- 1 **Q.** Could we please turn to POL00120723. This is a letter
2 from Cartwright King, we see it's in the case of *Post*
3 *Office Limited v Wylie*. If we go down, please, to just
4 under halfway, we see it says:
5 "The Crown's position on the integrity of the
6 Horizon system is set out in Steve Bradshaw's statement
7 dated 20 November 2012."
8 If we turn to page 5, please. That's the statement
9 from Stephen Bradshaw and it's effectively the statement
10 that was drafted by the PR person we saw and, if you
11 could go over the page, again, we see:
12 "When the system has been challenged in criminal
13 courts it has been successfully defended."
14 Were you aware of a decision in the Post Office
15 Legal Team for that copy to be used as witness
16 statements in criminal proceedings?
17 **A.** No, I wasn't.
18 **Q.** Do you think that's a failure, that you were sort of
19 involved in an *ad hoc* basis but not aware of the wider
20 issues and how a statement such as that was being used
21 in criminal proceedings?
22 **A.** So I think, because I was involved in an *ad hoc* way and
23 involved not at my choosing but someone reaching out to
24 me, then it was clearly impossible to control what was
25 happening. I had always understood that those

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1 prosecutions were being run appropriately, in good faith
 2 by Susan Crichton and Mr Singh.
 3 **Q.** Did you take any steps to satisfy yourself that that was
 4 accurate?
 5 **A.** I can't recall.
 6 **Q.** Could we please turn to POL00133644. We see this is
 7 a witness statement of Gareth Jenkins, dated 27 November
 8 2012. If we look over the page, please, midway down, it
 9 says:
 10 "I have been asked to provide a statement in the
 11 case of Kim Wylie."
 12 So it's the *Wylie* case we've seen appear a few times
 13 now. Over at page 3, please, Mr Jenkins says:
 14 "I also note a comment made about it being possible
 15 to remotely access the system. It is true that such
 16 access is possible; however in an analysis of data
 17 audited by the system, it is possible to identify any
 18 data that has not been input directly by staff in the
 19 Branch. Any such change to data is very rare and would
 20 be authorised by Post Office Ltd."
 21 I should ask first, did you see this statement at
 22 the time?
 23 **A.** Sorry?
 24 **Q.** Did you see this statement at the time?
 25 **A.** No, I wouldn't have seen any witness statements on
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1 this looks like me rushing to get an email out just
 2 before people go home for the weekend on a Friday,
 3 because things needed to happen.
 4 **Q.** We don't need to turn it up on the screen but, at
 5 paragraph 115 of your statement, page 27, you refer
 6 specifically to this email and you say:
 7 "I must have spoken to Jarnail Singh before drafting
 8 this email as I would have been unfamiliar with the
 9 criminal case and procedural issues, such as
 10 adjournments."
 11 **A.** Mm-hm.
 12 **Q.** First, can you recall what Mr Singh told you about bugs,
 13 errors or defects, if anything?
 14 **A.** Sorry, can you repeat?
 15 **Q.** Did Mr Singh tell you anything about bugs in the Horizon
 16 IT System?
 17 **A.** No.
 18 **Q.** That can come down. Thank you.
 19 I want to explore your knowledge of bugs. Before
 20 June 2013, were you aware of any bugs, errors or defects
 21 in the Horizon IT System?
 22 **A.** Not that I can recall, no.
 23 **Q.** Would you accept that, in early July 2013, you became
 24 aware of something called the Callendar Square bug?
 25 **A.** Yes.
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1 criminal prosecution cases.
 2 **Q.** Did anyone in the Post Office Legal team make you aware
 3 of this aspect of the statement about remote access?
 4 **A.** No.
 5 **Q.** Did anyone at Cartwright King raise this with you?
 6 **A.** No.
 7 **Q.** I want to go to a different matter now, again relating
 8 to Second Sight, and that's about bugs, errors and
 9 defects. Can we turn to POL00060572, please. If we
 10 turn to page 2, please, so we see your email of 28 June,
 11 and we can see you referring to various -- well, you see
 12 it says:
 13 "this Comms statement to include:
 14 "... found the 64 and 14 bugs", which we know are
 15 called the receipts and payments mismatch bug and the
 16 suspense account bug.
 17 So, at this point, I understand you accept you were
 18 involved with the response to challenges to Horizon more
 19 directly.
 20 **A.** Yes, I think this might have been the first day, because
 21 I'm not in the office. It's a Friday and I wouldn't
 22 work on a Friday. But I think Susan Crichton was away
 23 on holiday and I think I got reached out to and,
 24 probably before this email, there will have been
 25 a conference call with the people on the email because
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1 **Q.** Did you know, at that point, so by July 2013, when Post
 2 Office first had knowledge of the cash accounts bug?
 3 **A.** Is this the Falkirk bug?
 4 **Q.** Yes, I'm so sorry, yes. Callendar Square/Falkirk?
 5 **A.** I think in the bundle there is an email, I think, to
 6 Susan Crichton and I, talking about that bug at around
 7 that time.
 8 **Q.** Yes, well, we can turn to that, or at least what I think
 9 you're referring to, it's POL00029628. Just bear with
 10 me, sorry. I have to catch up.
 11 At the top, we see from Lesley Sewell and we see
 12 your name is at the very far right and left, so it's
 13 sent to you.
 14 **A.** Mm.
 15 **Q.** If we go down, please, to the email from Gareth Jenkins,
 16 it's subject "Callendar Square":
 17 "I've found some details on the problem ...
 18 "It was first raised in September 2005. The fix was
 19 applied as part of S90 which was rolled out February/
 20 March 2006."
 21 Next paragraph down, it says:
 22 "We reported the problem to [Post Office Limited]
 23 but I don't know how much of an investigation was
 24 carried out into the scope and the number of affected
 25 branches. I was not involved in the issue at the time
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1 and only really became aware of it as part of the *Misra*
 2 case in 2010."
 3 At that point in time, July 2013, when did you think
 4 that Post Office were first made aware of the Callendar
 5 Square bug?
 6 **A.** Having seen this, I would have assumed it was
 7 September -- no, he doesn't say that, does he? I don't
 8 know. I don't know.
 9 **Q.** Did you take any steps to find out?
 10 **A.** So I would have expected this to have come out of the
 11 enquiry stream that we were running at this time. So
 12 when that Friday, the 28th had occurred and the two
 13 other bugs were mentioned, the first priority, as I saw
 14 it, was, "Let's understand what the impact is for the
 15 criminal cases and the civil cases and, first and
 16 foremost, what do we need to do about those?" And, as
 17 part of that, I would have assumed that what would have
 18 come out would have been fact finding around the bugs
 19 and this one, as well, as to who knew what when.
 20 **Q.** Can you recall what the answer to "who knew what when"
 21 was?
 22 **A.** I can't recall, no, I'm sorry.
 23 **Q.** Did you see any documents that were relevant to when
 24 Post Office Limited discovered the Callendar Square bug?
 25 **A.** I can't recall.

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1 I think. We'll look at the 14 --
 2 **A.** Yeah, okay.
 3 **Q.** -- which I call the suspense account bug. In early July
 4 2013, do you accept you were aware that Post Office had
 5 knowledge of the suspense bug in June 2012?
 6 **A.** That's the one we just saw on the --
 7 **Q.** Let's go to the document, so it may be easier that way.
 8 **A.** Thank you.
 9 **Q.** POL00029641, please. Thank you. We see you're the
 10 sendee at the top --
 11 **A.** Yeah.
 12 **Q.** -- the sender, sorry, dated 4 July 2013, to Susan
 13 Crichton. You say:
 14 "We need to keep each other copied in on
 15 everything."
 16 You see, "Timeline for Local Suspense Problem."
 17 If we can go down, please. It says, email from
 18 Rodric Williams:
 19 "All -- here's my summary of my call with Andy Winn
 20 ..."
 21 It says:
 22 "Issue first surfaced at [Post Office Finance
 23 Centre] on 6 February 2012, at the close of Branch
 24 Trading period."
 25 You see that that was resolved without noting the

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1 **Q.** Do you remember how Post Office Limited searched for
 2 documents on that issue?
 3 **A.** No.
 4 **Q.** Moving to the receipts and payments mismatch bug, do you
 5 accept that you were aware in late June 2013, firstly,
 6 about the receipts and payments mismatch bug?
 7 **A.** This is one of the ones I would call the 14 --
 8 **Q.** The 14 bug?
 9 **A.** Yes, yes.
 10 **Q.** Can we turn, please, to POL00107948. At the bottom of
 11 that page, please, we see an email from Rodric Williams,
 12 1 July, to you and others, yes?
 13 **A.** Yes.
 14 **Q.** It refers to a draft briefing note. If you carry on
 15 further down, please, to page 4, and to the bottom,
 16 please. You see an email from Simon Baker, "Summary of
 17 Receipts Payments problems", and the timeline set out:
 18 March 2010, first incidence occurred; March 2011, letter
 19 sent to branches and corrections made.
 20 So, at this time, July 2013, you were aware, weren't
 21 you, that Post Office Limited had been aware of this
 22 receipts and payments problem by at least March 2011?
 23 **A.** Yes, I think at this point this information is coming,
 24 yes.
 25 **Q.** So the receipts and payments mismatch was the 62,

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1 bug. If we go over the page, please -- that was my
 2 error, slightly up -- thank you:
 3 "On 6 February 2013, the Willen [branch
 4 subpostmaster] contacted [the NBSC] to report the same
 5 discrepancy in his branch trading as the previous year.
 6 "NBSC passed this on to Fujitsu between 6 and
 7 8 February 2013.
 8 "Fujitsu then notified FSC ..."
 9 That's Post Office Finance Service Centre, isn't it?
 10 **A.** I don't know, sorry.
 11 **Q.** Well, if you look at the top, first bullet point?
 12 **A.** Oh, okay, sorry. Thank you.
 13 **Q.** "... of the problem on 28 February 2013."
 14 So, by this point, you were aware on this issue, the
 15 suspense account issue, Post Office had knowledge of it
 16 from 28 February 2013.
 17 **A.** Yes.
 18 **Q.** Was this common knowledge at this time in the Legal
 19 team?
 20 **A.** I think it would have been known between the lawyers,
 21 Susan Crichton, myself, Mr Singh and Rodric Williams,
 22 and this week was a whirlwind, so information was coming
 23 every day. There were briefing notes to be commented on
 24 every day. This was a very busy week.
 25 **Q.** At that point did you think there would have been

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1 documents relevant to those bugs to which Post Office
 2 Limited had access?
 3 **A.** I can't recall that specific thought. Our priority was
 4 to get the criminal and civil advice to see how we took
 5 it forward, if there were any issues around the
 6 convictions, et cetera, that were unsafe.
 7 **Q.** Well, at this point, you're finding out that Post Office
 8 had knowledge, over a number of years, of various --
 9 three bugs, correct?
 10 **A.** Yes, I think so.
 11 **Q.** And you're considering what advice is necessary on civil
 12 and criminal --
 13 **A.** Yes.
 14 **Q.** -- including criminal convictions?
 15 **A.** Yes. We're seeking that advice from the external
 16 specialists.
 17 **Q.** Surely it must have occurred to you that one of those
 18 issues would be, "Well, have we disclosed documents that
 19 are relevant to these bugs, to people who have been
 20 convicted on the basis of Horizon data"?
 21 **A.** I assume that was part of what the externals were
 22 considering at looking at, yes.
 23 **Q.** Why weren't you considering it?
 24 **A.** So in -- I thought it was being dealt with by the
 25 externals in conjunction with Mr Singh and Mr Williams.

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1 **Q.** Well, in these discussions at the time, was anyone
 2 saying, "We need to look for these documents"?
 3 **A.** I can't recall that, no.
 4 **Q.** Can we look at POL00145142. So this is your email to
 5 Martin Smith and Simon Clarke, they're both
 6 representatives of Cartwright King?
 7 **A.** Yes.
 8 **Q.** We see Jarnail Singh, Susan Crichton and Rodric Williams
 9 in copy. You're asking for whether advice had been
 10 changed because of a new timeline on the local suspense
 11 account bug. You put two questions. The first is:
 12 "Do you still have to look back to cases since it
 13 first happened in Jan 2012 (we will want you to
 14 anyway)."
 15 Can I just ask you to explain what advice you were
 16 seeking in that question?
 17 **A.** I can't recall offhand. I must have thought there was
 18 a logical question to be asked and I asked it.
 19 **Q.** You can't assist us further?
 20 **A.** It looks like I'm asking about do we have to go back and
 21 review past cases?
 22 **Q.** At that point, why was January 2012 being picked?
 23 **A.** I don't know. I can't recall.
 24 **Q.** Can you recall whether anyone raised the review going
 25 back to 2005, when the Callendar Square bug was

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1 **Q.** But you're being brought in here, aren't you?
 2 **A.** Yes.
 3 **Q.** Do you accept, on its face, there's a potential serious
 4 disclosure failing here, if information about these bugs
 5 hadn't been communicated to subpostmasters who'd been
 6 convicted on the basis of Horizon data?
 7 **A.** Yes, and I understood that was the advice we were
 8 seeking.
 9 **Q.** Is your evidence that, at that point, it didn't occur to
 10 you to look for documents yourself that may be relevant
 11 to those bugs, errors and defects?
 12 **A.** I can't recall that specific issue.
 13 **Q.** Do you think you would have thought that? Is it likely
 14 that you would have thought that?
 15 **A.** It's difficult to say. Why is it difficult to say?
 16 **Q.** Why is it difficult to say?
 17 **A.** Because of my lack of knowledge of criminal law.
 18 **Q.** But, standing back, do you need knowledge of criminal
 19 law to know that, if someone has been convicted on the
 20 basis of Horizon data and Post Office is aware or had
 21 been aware of bugs in the Horizon system, that it was
 22 necessary to disclose documents relevant to that?
 23 **A.** I would have expected any direction around that to come
 24 from the external advice and say, "Okay, you need to do
 25 X, Y and Z".

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1 identified?
 2 **A.** I can't recall, sorry.
 3 **Q.** You say, number 2:
 4 "Does this mean the only GJ ..."
 5 Presumably that's Gareth Jenkins?
 6 **A.** I would expect so, yeah.
 7 **Q.** "... the only [Gareth Jenkins] statements that might
 8 give concern are the ones since February 2013?"
 9 Do we take it from that that, at this point, you
 10 were aware of the advice that was subsequently given in
 11 writing by Simon Clarke that Gareth Jenkins, in his
 12 view, was in breach of his duties as an expert?
 13 **A.** I can't recall. I may have gone to that gone to that
 14 con on the 3rd. I can't recall.
 15 **Q.** Well, what else would that mean?
 16 **A.** I don't know if someone was talking about the statements
 17 in a high-level way, I just can't recall, I'm afraid.
 18 There's clearly an issue that I've picked up on but
 19 I can't remember any of the detail about it.
 20 **Q.** We know as a matter of fact what happened. On 15 July,
 21 Simon Clarke gave advice on Gareth Jenkins, in stating
 22 he was in breach of his duty as an expert. That was
 23 a written advice. Are you aware of anything else that
 24 this email could refer to relating to Gareth Jenkins'
 25 statements, other than concerns raised by Martin Smith

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1 and Simon Clarke as to his duties as an expert?
 2 **A.** I'm afraid I just couldn't remember and I couldn't think
 3 of anything but I can't recall with any certainty.
 4 **Q.** I'm going to put it one final time: do you accept, at
 5 this stage, 4 July 2013, you were aware of the concerns
 6 about Gareth Jenkins as an expert and whether he was in
 7 breach of his expert duties?
 8 **A.** I may have been but I just cannot recall.
 9 **Q.** You say:
 10 "Susan and I have to brief the CEO at 9.45."
 11 **A.** Mm-hm.
 12 **Q.** Can you remember what that briefing was about?
 13 **A.** No.
 14 **Q.** I expect I know the answer to this but do you remember
 15 what you told the CEO and whether you told her anything
 16 in relation to Gareth Jenkins?
 17 **A.** I'm afraid I don't.
 18 **Q.** Please could we go to POL00296821, and if we could go --
 19 we see there, sorry, you're sent this email by Alwen
 20 Lyons on 28 June. If we go down slightly, we see:
 21 "FYI -- summary advice on the impact of bug 14 on
 22 Bowness Road."
 23 Then, back to the top, Alwen Lyons says:
 24 "Can we call bugs incidents from now on please."
 25 Do you remember receiving this email?

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1 for a period of time and I think there was challenge
 2 because Rodric Williams was due to be away the following
 3 week and Mr Singh, I believe.
 4 **Q.** Why was that relevant to the conference?
 5 **A.** I think the genesis of the conference might be Susan
 6 Crichton seeking a degree of high-level support from
 7 Bond Dickinson at that point.
 8 **Q.** At 3, we see it says:
 9 "The Board want to sack SS ..."
 10 Does that refer to Second Sight?
 11 **A.** I believe so, yes.
 12 **Q.** "... and of course are now not coping well with the fact
 13 that they are independent. [Susan Crichton] is going to
 14 arrange to meet [Second Sight] and she asked if she
 15 could use our offices next Tuesday."
 16 What was the discussion on --
 17 Well, no, let's start first, does "the Board" refer
 18 to the Board of Post Office Limited?
 19 **A.** I believe so.
 20 **Q.** What can you recall about this discussion?
 21 **A.** I can't recall anything specifically about this
 22 discussion.
 23 **Q.** It's quite significant, isn't it, the Board saying they
 24 want to sack Second Sight?
 25 **A.** I remember that particular thought being mentioned,

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1 **A.** I don't remember receiving it but I do remember some
 2 people wanting to use different words for bugs.
 3 **Q.** What do you remember about that?
 4 **A.** I remember thinking at the time it was slightly idiotic,
 5 in that people would know what was being talked about,
 6 so why would you use a different word?
 7 **Q.** Did you ask for the reasons behind this message?
 8 **A.** I can't recall if I did or no.
 9 **Q.** Was it because people in Post Office wanted to play down
 10 the impact of the word "bug"?
 11 **A.** I don't know. It may have been but I don't know.
 12 **Q.** Did you follow this advice?
 13 **A.** I can't recall personally following it.
 14 **Q.** Can we, please, go to POL00407582. This is
 15 an attendance note with Simon Richardson. Is he of Bond
 16 Dickinson?
 17 **A.** Yes, I think he was one of the senior partners at Bond
 18 Dickinson.
 19 **Q.** It's on 10 July, you and Susan Crichton are noted to be
 20 in attendance. If we could just go down so we can see
 21 more of the body of the attendance note, please. Can
 22 you remember what the purpose of this conference was?
 23 **A.** No.
 24 **Q.** At 3 --
 25 **A.** I think it was in the context of I was about to go away

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1 probably by Susan Crichton, at some point in these two
 2 weeks because I was surprised because I'd always thought
 3 Second Sight was the way to go. So I wasn't persuaded
 4 by those floodgate arguments, et cetera, back in the
 5 previous summer when they were appointed. And
 6 I thought, once you had appointed them and signed up to
 7 an independent review, then there was always the chance
 8 that you would get an answer that wasn't an answer that
 9 you were expecting.
 10 So to have a reaction suggested by, you know,
 11 somebody's view was "sack Second Sight", that seemed to
 12 be slightly odd because that would be a very public
 13 event.
 14 **Q.** Well, if you thought it was slightly odd -- you say you
 15 thought it may have been Susan Crichton -- did you ask
 16 her why they wanted to sack them?
 17 **A.** I may have done but I can't remember when sacking them
 18 was first mentioned.
 19 **Q.** Well, this was an attendance note of 10 July 2013, so
 20 it's mentioned by that point.
 21 **A.** Yes, yeah.
 22 **Q.** Do you recall why or were there any reasons given as to
 23 why it was said the Board want to sack Second Sight?
 24 **A.** No, I can't recall any specific conversation or
 25 explanation of reasons.

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1 Q. Just before we take the break, you've referred to you
 2 were about to go way for a period of time and in your
 3 witness statement you say that was for a sabbatical?
 4 A. Yes.
 5 Q. When was it arranged that you would go on sabbatical?
 6 A. Probably the previous year because it was driven -- my
 7 wife had a sabbatical at her place of work.
 8 Q. So it was unconnected to Second Sight?
 9 A. Totally unconnected.
 10 MR STEVENS: Sir, that's probably a good time to take the
 11 second morning break. If we could come back at 12.10.
 12 SIR WYN WILLIAMS: Yes, okay. But we're going to finish
 13 this witness this morning, I take it?
 14 MR STEVENS: Yes, absolutely. I've not many more questions.
 15 SIR WYN WILLIAMS: That's fine, Mr Stevens, okay.
 16 MR STEVENS: Thank you, sir.
 17 (11.59 am)
 18 (A short break)
 19 (12.10 pm)
 20 MR STEVENS: Good afternoon, sir, can you see and hear me?
 21 SIR WYN WILLIAMS: Yes, I can, thanks.
 22 MR STEVENS: Okay, I'll carry on.
 23 I went earlier to your knowledge of Gareth Jenkins
 24 and the advice of Simon Clarke, that he was in breach of
 25 his expert duties.

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1 Gibson, it may have been that some information needed to
 2 be given to a Government minister.
 3 Q. Would you have put this together yourself or would you
 4 have relied on --
 5 A. Absolutely not. This would have come from Mr Singh.
 6 Q. Mr Singh?
 7 A. Yeah.
 8 Q. Would you have taken any advice from Cartwright King, as
 9 well?
 10 A. I can't recall. I think it might be Mr Singh because
 11 also he is copied in on the email.
 12 Q. It says:
 13 "MISRA case
 14 "Defendant pleaded not guilty to theft (but pleaded
 15 guilty to [false accounting])
 16 "Defendant produced computer expert to argue Horizon
 17 issues
 18 "[The Post Office] used Fujitsu expert to argue
 19 Horizon issues
 20 "Outcome -- found guilty by a jury of theft after
 21 a 7-day trial
 22 "Evidence relied to convict --
 23 "She alleged it was either Horizon computer or her
 24 employees
 25 "She said after she got rid of employees the losses

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1 A. Mm, yeah.
 2 Q. I asked you, by 4 July 2013, were you aware of that and
 3 you said you couldn't recall. Do you now have
 4 a positive recollection as to when you first became
 5 aware of those issues?
 6 A. Not a precise, positive recollection, no, sorry.
 7 Q. Can we turn to POL00060681, please. So this is an email
 8 from you to Will Gibson --
 9 A. Mm-hm.
 10 Q. -- on 9 July 2013. It says, next to Will Gibson's name
 11 "ShEx", that's the Shareholder Executive, isn't it?
 12 A. Yes, that's the department, the BIS Government
 13 Department that's responsible for the Post Office.
 14 Q. So, effectively, the agency that oversaw the Crown's
 15 shareholding interests --
 16 A. Yes, yes.
 17 Q. -- in Post Office. Did you often report to people at
 18 Shareholder Executive?
 19 A. No, by exception.
 20 Q. You see you say:
 21 "URGENT -- Will -- intel on MP cases -- JFSA case
 22 intel to follow."
 23 You set out a matter on the *Misra* case. Do you
 24 remember why you were asked to provide this information?
 25 A. No, it may have been -- given it was ShEx and Will

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1 got worse
 2 "Therefore she blamed Horizon (at a late stage in
 3 proceedings -- after it was listed for trial -- so this
 4 trial got adjourned whilst each side got Horizon
 5 evidence together)
 6 "It was a jury trial -- so no explanation as to what
 7 evidence was relied on by them re conviction."
 8 Why didn't you refer to the advice that had been
 9 given about Gareth Jenkins, that he was in breach of his
 10 duties as an expert?
 11 A. I can't recall. I know this would have been provided by
 12 Mr Singh and I would have been relying on him to give me
 13 the correct picture.
 14 Q. I know you say you can't recall when you became aware of
 15 the allegations about Gareth Jenkins, if you were aware
 16 of those matters at the time you sent this email, did
 17 you accept you should have included it in this email?
 18 A. I wouldn't have necessarily assumed that, because
 19 something around that might have been dealt with by
 20 Susan Crichton, at that level, with ShEx.
 21 Q. On the basis that you were aware of the issues to do
 22 with Gareth Jenkins, this summary of the *Misra* case
 23 isn't a full and fair description of the issues Post
 24 Office Limited was facing in relation to this *Misra*
 25 case, was it?

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1 A. Sorry, I think the context of this email was that
 2 an urgent turnaround on it was needed and I think it's
 3 done in a matter of minutes, if you look at the timing,
 4 so --
 5 Q. It wouldn't take you long, would it, to write, "We have
 6 advised that the expert evidence in this trial was
 7 provided by an expert who has been in breach of his
 8 duties"?"
 9 A. I agree with you but I'm not -- I can't recall at the
 10 time whether I took the point or not.
 11 Q. You didn't raise the point, did you?
 12 A. I didn't raise the point because it's not on that email,
 13 no.
 14 Q. The issue is why; do you know why?
 15 A. I can't recall at the time.
 16 Q. Can you think of a good reason why you didn't?
 17 A. I'm sorry, I can't.
 18 Q. Would you accept that it's a failing not to have
 19 referred to it?
 20 A. I don't know if it's a failing because I don't know if
 21 that information was being separately communicated to
 22 ShEx.
 23 Q. Well, would it be incumbent on you to check if it was
 24 being separately communicated to ShEx?
 25 A. So, if you see, I've also copied in Susan Crichton and

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1 either because you didn't know or you assumed that one
 2 of those would tell him; is that it in a nutshell?
 3 A. I think that's probably it in a nutshell, sir.
 4 **SIR WYN WILLIAMS:** Fine.
 5 **MR STEVENS:** Thank you, sir. That document can come down.
 6 Before you went on your sabbatical, did anyone raise
 7 a concern about how Gareth Jenkins had been instructed,
 8 namely whether he'd been advised of his duties as
 9 an expert?
 10 A. I can't recall specifically that matter being raised.
 11 That's not to say it wasn't discussed by someone but
 12 I can't recall it.
 13 Q. Can you recall whether there was any investigation into
 14 the manner in which Gareth Jenkins had been instructed
 15 by the Post Office Limited Criminal Law Department?
 16 A. I can't recall that during the -- those July weeks in
 17 the run-up to the sabbatical.
 18 Q. Did you discuss this with Jarnail Singh at all?
 19 A. I can't remember if I discussed it with him or not.
 20 Q. Would you accept that it was important for the Post
 21 Office Legal Department to examine how Mr Jenkins had
 22 been instructed and whether he'd been instructed
 23 properly?
 24 A. Yes, I would.
 25 Q. Who do you say was responsible for that?

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1 Alwen Lyons.
 2 Q. Did you take steps with them to see that they were
 3 communicating the issues with Gareth Jenkins to
 4 Shareholder Executive?
 5 A. I may have done but I can't honestly recall.
 6 **SIR WYN WILLIAMS:** I think you told me that this email was
 7 either drafted by -- these are my words, not yours, so
 8 let's see if I've got it right -- it was either actually
 9 drafted for you by Mr Singh or the information came from
 10 Mr Singh, so, if Mr Singh knew of the advice about
 11 Gareth Jenkins, have you got a view about whether he
 12 should have included it or told you about it?
 13 A. If he knew about it and he thought it was pertinent from
 14 the criminal perspective, then, yes, I suppose he should
 15 have put it on the email.
 16 **SIR WYN WILLIAMS:** Ms Crichton and Ms Lyons were copied into
 17 this email and, if they knew of the advice about
 18 Mr Jenkins, should they have in some way intervened to
 19 ensure that the shareholder was given that information?
 20 A. I would have expected them to, which is probably why
 21 I've included them on copy in the email.
 22 **SIR WYN WILLIAMS:** So, one way or another, it seems to me
 23 that you are accepting that the shareholder should have
 24 been told about the information, assuming that any of
 25 these people knew about it, and you didn't tell him,

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1 A. So I was going on sabbatical and I would have thought
 2 an issue like that would have been dealt with by Susan
 3 Crichton with support from Mr Singh or Mr Williams.
 4 Q. The advice on Gareth Jenkins, dated 15 July -- I can
 5 bring it up if it assists -- do you recall reading it?
 6 A. I recall I might have read it when I came back from
 7 sabbatical.
 8 Q. You say you might have.
 9 A. I can't recall specifically but it would be likely
 10 I would have read it when I came back from sabbatical.
 11 Q. Did you, when you read it, check whether any steps had
 12 been taken to examine how Mr Jenkins had been
 13 instructed?
 14 A. So I remember having conversations with Susan Crichton
 15 when I came back and it was, I think, on the cusp of her
 16 resigning around -- in the -- sorry, in the wake of her
 17 resigning, I suppose, what matters needed addressing,
 18 and I can't recall that being on a live list of matters
 19 as a point to be resolved.
 20 Q. Did you read the 2 August -- I can show it if you
 21 need -- advice by Simon Clarke regarding allegations
 22 that documents had been shredded?
 23 A. I can remember, I think, seeing that when I returned
 24 from sabbatical.
 25 Q. Presumably, that came as a --

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1 A. That was quite a -- yeah.
 2 Q. -- significant surprise?
 3 A. Yes.
 4 Q. What steps did you take, if any, to see whether those
 5 matters had been investigated?
 6 A. So I remember having a conversation, it might have been
 7 Mr Singh, it might have been with Susan Crichton,
 8 because I saw Susan Crichton, the correspondence that
 9 related to that, subsequently, and I have a vague
 10 recollection that it was described as a 'dealt with'
 11 matter and, in fact, there hadn't been any document
 12 disruption. But that's a vague recollection only.
 13 Q. I want to cover one final topic before there will be
 14 some Core Participant questions, which I anticipate will
 15 take us to lunch. Can we please bring up POL00192214.
 16 Could we go to the bottom of page 3, please. So we see
 17 discussed is a letter received from the CCRC -- from
 18 Susan Crichton, I should say, sorry -- you're in copy
 19 and it says:
 20 "... their advice feels odd to me as if given on
 21 a take it or leave it basis and I am not comfortable
 22 that's particularly useful in this context. Could we
 23 discuss, I am happy to go to another firm that
 24 specialises in criminal law, or a barrister, somehow it
 25 feels as if there is a conflict here which I am not sure

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1 estimate of 20 to 25 minutes; Mr Henry, I think he said
 2 ten minutes; and Mr Jacobs says five minutes.
 3 SIR WYN WILLIAMS: Well, we'd better crack on, because
 4 they're all going to finish by 1.00, Mr Stevens.
 5 MR STEVENS: Yes, I was going to say. Sir, I'm in your
 6 hands. Would you --
 7 SIR WYN WILLIAMS: Let's have the two short ones first, and
 8 please stick to the shortness of the questioning that
 9 you predicted.
 10 MR STEVENS: Yes, so on that basis, then, it'll be Mr Jacobs
 11 first.

12 **Questioned by MR JACOBS**

13 MR JACOBS: Mr Flemington, I represent a large
 14 number of subpostmasters.
 15 Could we go very quickly to POL00143379. It's
 16 an email from Jarnail Singh to yourself, dated 16 July
 17 2012, and you deal with it at paragraph 88 of your
 18 witness statement so we know you've seen it. This was
 19 an email chain in light of Harry Bowyer's advice, dated
 20 11 July when he talks about what's been described as
 21 a floodgates issue, and there was severe recriminations
 22 for the business if Second Sight uncovered any systemic
 23 problems. I think you dealt with that with Mr Stevens
 24 at 11.00 this morning, yes?
 25 A. Yes.

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1 I understand."
 2 Do you recall there being any conversation about
 3 whether or not Cartwright King had a conflict of
 4 interest in overseeing matters related to the CCRC and
 5 the review of past convictions?
 6 A. No, I don't.
 7 Q. You were copied in to this email, did you not discuss
 8 this with Susan Crichton at the time?
 9 A. No, because I think, by this stage, I had left and I was
 10 on sabbatical. I think I went on sabbatical Friday, the
 11 12th.
 12 Q. So you can't assist at all with any discussions on --
 13 A. Sorry?
 14 Q. You can't assist at all with discussions on a potential
 15 conflict of interest?
 16 A. No, I don't think I was -- I know there are occasions
 17 where I am on sabbatical and I respond to emails and
 18 there's one mention of me doing a call with Beachcroft
 19 over (*unclear*) but, other than that, I can't recall
 20 being on any phone calls or any discussions whatsoever.
 21 MR STEVENS: Thank you. That's all the questions, I have,
 22 sir.
 23 We have questions from three sets of Core
 24 Participants: I understand the recognised legal
 25 representative for Gareth Jenkins, who has given a time

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1 Q. So what we have here is Mr Singh saying, if we could
 2 scroll down to the sixth line:
 3 "All this will mean we have to provide extra
 4 evidence as defence would put us to proof as to systems
 5 integrity. Also increase in vast disclosure requests,
 6 cases being transformed, from general deficiency trials
 7 into boundless enquiry into the Horizon system. This
 8 would mean vast scope of disclosure requests, task would
 9 be close to overwhelming, only way to comply with
 10 prosecution disclosure obligations would be to instruct
 11 an expert at Fujitsu ..."
 12 It then talks about sticking points:
 13 "Sticking points in disclosure processes would be
 14 costs of obtain Horizon data. Transaction logs would be
 15 obtained from Fujitsu that show the details of every
 16 single transaction at a post office."
 17 Then he goes on to talk about costs:
 18 "For example dense request could be for logs from
 19 six months prior to the defendants tenure to the present
 20 time and cost of obtaining that data would frankly be
 21 astronomical.
 22 "It is expensive to obtain this material because
 23 expense simply results from post offices contractual
 24 obligations to Fujitsu."
 25 So he's talking about the contract:

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1 "For example to obtain six months data would cost
2 £20,000 and mountain of information covering more than
3 5 years would cost???"

4 So what we have here is the Head of Criminal Law at
5 Post Office saying that, because of the contract with
6 Fujitsu, there is a bar to compliance with disclosure
7 obligations in criminal cases because the costs are
8 untenable or unaffordable. Do you accept that, that
9 that's what he's effectively saying, Mr Flemington?

10 **A.** I think he's saying that the costs are high or
11 significant. My reaction to that would have been that
12 this shouldn't be driven by cost.

13 **Q.** Yes. It's Mr Singh's concerns, though, that the
14 floodgate point that Mr Bowyer raises would have
15 an impact on ability to comply with disclosure. Do you
16 accept that?

17 **A.** I suppose, in one sense, he's saying the floodgates
18 would be very, very costly and the way I would have
19 looked at this would be to say, well, there might
20 technically be a limit on costs, et cetera, but
21 everything on the commercial side would be up for
22 renegotiation.

23 **Q.** Didn't this put you on notice, Mr Flemington, that there
24 was a concern that Post Office had not been complying
25 with their disclosure obligations in criminal cases

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1 **A.** I think there may have been discussions with Fujitsu
2 around assistance for disclosure obligations. I can't
3 recall when those would have been but they may have been
4 in 2012/2013.

5 **Q.** Did you make any enquiries as to whether this had been
6 a problem or an issue with disclosure in past criminal
7 prosecutions, such that they might be unsafe?

8 **A.** I can't recall that.

9 **Q.** Why not, given what Mr Singh says?

10 **A.** Sorry, I simply can't remember.

11 **MR JACOBS:** Okay, very well. I don't have any further
12 questions, thank you?

13 **SIR BRIAN LANGSTAFF:** Thank you Mr Jacobs. Is it Mr Henry
14 or Ms Page?

15 **MR STEVENS:** Mr Henry.

16 **Questioned by MR HENRY**

17 **MR HENRY:** Thank you very much, sir.

18 Mr Flemington, if it were to be suggested that your
19 evidence is a sustained study in accountability, what
20 would you say?

21 **A.** I've tried to answer the questions, sir, to the best of
22 my recollection.

23 **Q.** I want to pick up on what Mr Jacobs has said and you
24 saying that you would have given unequivocal advice that
25 costs shouldn't enter in the issue concerning data. Do

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1 where Horizon issues were raised because of the
2 contractual issue with Fujitsu, because of the cost of
3 providing that information?

4 **A.** I don't recall making that conclusion.

5 **Q.** Because the implication from Mr Singh is "Well, we can't
6 afford to provide this disclosure in criminal cases
7 because it's too expensive and let's just hope that
8 somehow Post Office can muddle through". Isn't that
9 something that's quite worrying when you're thinking
10 about criminal prosecutions and disclosure and how
11 important disclosure is?

12 **A.** So my view would have been that cost would not be
13 a restriction on us complying with our legal
14 obligations; how could it be?

15 **Q.** Did you respond to Mr Singh and say, "No, absolutely
16 not, this cannot be the Post Office's approach"?

17 **A.** I can't recall, I'm afraid.

18 **Q.** Did you speak to anyone about it?

19 **A.** It's likely I would have spoken to Susan Crichton about
20 it.

21 **Q.** Was the matter ever resolved between Post Office and
22 Fujitsu? Are you aware of any meetings where it was
23 said, "We simply can't afford to be bled dry in this way
24 because we have absolute disclosure obligations in
25 criminal cases"?

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1 you remember, you've just --

2 **A.** Yes.

3 **Q.** Could we go, please, to POL00143384, and could we go
4 down, please, to -- well, we can see:

5 "Do you think we should invite Simon Baker to the
6 call?"

7 So that's the Company Secretary asking for your
8 opinion on that. So you're clearly, you know, being
9 consulted by the Company Secretary as to whether
10 Mr Baker should be involved, correct?

11 **A.** Yes.

12 **Q.** Go down, please, to your email and that is 16 July 2012.
13 This, of course, is in the aftermath of Second Sight,
14 and it looks like full steam ahead for the Post Office,
15 doesn't it?

16 "... assume your recollection hasn't changed and is
17 still to keep fighting any such application?"

18 That would be an abuse of process application:

19 "Issues appear to be:

20 "Comms brief needed to rebut the myths/untrue
21 reporting about Second Sight review.

22 "Clarity [regarding] Second Sight's terms of
23 reference, timetable etc.

24 "A plan/bible of what information we are going to
25 provide our legal teams [with] and the courts if we have

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1 to fight applications to stay.
 2 "Plan to deal with disclosure requests, eg how we
 3 balance obtaining transaction logs and other Horizon
 4 data alongside the costs of doing so."
 5 Do you want to reflect on the answer you gave to
 6 Mr Jacobs?
 7 **A.** So point 4 is about -- in terms of doing sensible
 8 budgeting and it's basically saying that we would have
 9 to be able to find the money to do these activities.
 10 **Q.** Well, it doesn't actually say that, does it? How we
 11 balance obtaining transaction logs --
 12 **A.** Sorry, I think it's a poor choice of words by me because
 13 I think it's ambiguous but --
 14 **Q.** But they are your words, Mr Flemington.
 15 **A.** And I agree but the sentiment of them was that we were
 16 going to have to have budgeting issues in order to find
 17 the money to do this.
 18 **Q.** You seemed to be quite involved in criminal law for
 19 somebody who said that you weren't involved in criminal
 20 law at all. What do you have to say to that?
 21 **A.** I found myself getting drawn into these matters
 22 occasionally and sporadically, and I would always try to
 23 progress the matter in good faith where I could but,
 24 where I couldn't, I would escalate up to Susan Crichton.
 25 **Q.** I want to go back now to October 2010, and no need to
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1 have happened if, for example, Seema Misra's case had
 2 ended in an acquittal? You would have that to have been
 3 involved in dealing with the aftermath of that,
 4 consistent with your responsibility?
 5 **A.** There's two things would like to say to that, sir, one
 6 is that I can't recall any meetings ever happening on
 7 that and that particular work strand going forward; and,
 8 secondly, this probably was in the context of separation
 9 and the fact that, actually, Mandy Talbot was thinking
 10 in terms of, eventually, Royal Mail Civil Litigation
 11 won't be doing these cases and will hand over conduct of
 12 them to Post Office. So my -- I can't recall, but
 13 I think it's likely she was starting to think about
 14 planning that transition over.
 15 **Q.** I suggest that's a rationalisation and, of course, it
 16 would have absolutely nothing to do, that answer, with
 17 your receipt of the Horizon bandwagon email, would it --
 18 **A.** I believe --
 19 **Q.** -- later that afternoon?
 20 **A.** No, I remember, I quite remember the email you're
 21 talking about because that was the one where I thought
 22 the language was not good.
 23 **SIR WYN WILLIAMS:** Inappropriate.
 24 **A.** Yes.
 25 **SIR WYN WILLIAMS:** Right.
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1 get it up on the screen because you'll remember the
 2 emails from Mandy Talbot but, just before the *Seema*
 3 *Misra* trial begins, you're contacted by her in
 4 an attempt to arrange, and I quote:
 5 "A conference call to discuss how we deal with these
 6 cases going forward, possibly on 20 October as by then
 7 I anticipate that *Misra* will have concluded."
 8 Then on 21 October 2010, when the jury was out in
 9 Mrs Misra's case, Mrs Mandy Talbot sent you another
 10 email, a second attempt at organising a conference and
 11 you're first on the distribution list.
 12 Now, your evidence, as I understand it, is that
 13 you're accidentally drawn into those emails because,
 14 really, it's nothing to do with you?
 15 **A.** So if I was drawn into things, such as the conference
 16 about Second Sight or the *Wylie* emails, or the like, it
 17 wasn't at my choosing, it wasn't at my control and, at
 18 that point, I thought, "I will try to progress matters
 19 as best I can and, where I can't, I will escalate them".
 20 **Q.** May I make a suggestion: these cases concerning Horizon
 21 that Mandy Talbot was involving you in, in October 2010,
 22 reflected the Post Office's policy of bringing test
 23 cases and, of course, nobody knew what the outcome of
 24 the *Misra* trial would be and you were involved in this
 25 to, as it were, deal with policy, because what would
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1 **A.** But there was a point -- I think there was another email
 2 not in my bundle but someone else's, where there's
 3 a thank you for involvement on *Misra* and I think I might
 4 have been on that, and I remember contacting the person
 5 who sent it and said, "Thank you for the sentiment but
 6 I'm absolutely not involved in the *Misra* case".
 7 **MR HENRY:** You say that but, of course, in July 2013, as we
 8 saw from Mr Stevens' last questions to you, there's the
 9 Will Gibson email, just after the second break, and you
 10 say that was drafted by Jarnail Singh.
 11 **A.** Yes, sir.
 12 **Q.** So why do you copy him into it, if he's drafted it?
 13 **A.** Because if Mr Gibson had any further follow-up questions
 14 he could go to Mr Singh.
 15 **Q.** I see. I want to go to one final document, please,
 16 POL00031352. That is sent on 1 July, and it's "Discuss
 17 of defect in Horizon in court Seema Misra and Lee
 18 Castleton".
 19 By that stage, you were aware, were you not, of the
 20 difficulties with Gareth Jenkins?
 21 **A.** I can't recall.
 22 **Q.** You can't recall? You were shortly aware thereafter,
 23 your answers to Mr Stevens, about the difficulties with
 24 Gareth Jenkins.
 25 **A.** There would have been some point at which Gareth Jenkins
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1 as an issue was flagged during those two weeks in July
 2 but I cannot recall precisely when.

3 **Q.** I mean, it's clear -- you're the first recipient of
 4 this, together with the Company Secretary, also the
 5 Chief Information Officer, Lesley J Sewell. It's clear
 6 that Gareth Jenkins is the linchpin of your defence in
 7 Horizon and then he was, to your knowledge, "damaged
 8 goods". Why wasn't the CCRC immediately informed of
 9 this, Mr Flemington?

10 **A.** I wouldn't have the knowledge to know to inform them and
 11 I would be relying on Mr Singh and Cartwright King to
 12 flag that.

13 **Q.** Is that your evidence, Mr Flemington, that you wouldn't
 14 have appreciated what you, as Head of the Legal
 15 Department, ought to have urgently tabled for
 16 discussion?

17 **A.** I was surrounded by other lawyers and expert advisers
 18 and external counsel, and I cannot recall that point as
 19 an urgent matter being highlighted at all.

20 **Q.** So this all becomes, does it not, part of a picture of
 21 mutually delegated irresponsibility: somebody else is
 22 dealing with it?

23 **A.** No, sir, we are trying to take advice, taking advice and
 24 acting on it in good faith.

25 **MR HENRY:** Thank you, Mr Flemington.

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1 **SIR WYN WILLIAMS:** Fine okay.
 2 Next, please.

3 **Questioned by MS OLIVER**

4 **MS OLIVER:** Thank you, sir, it's Ms Oliver today.
 5 Good afternoon, Mr Flemington. I ask questions on
 6 behalf of Gareth Jenkins. You've said that you have no
 7 criminal litigation experience.

8 **A.** Correct.

9 **Q.** The thrust of your evidence had been that you left
 10 supervision of Jarnail Singh largely to Susan Crichton?

11 **A.** I didn't leave supervision to Susan Crichton; Susan
 12 Crichton was the GC and that is the way she organised
 13 the department set-up. She said at the outset, "You
 14 won't be supervising Criminal Litigation or Civil
 15 Litigation. I will do that".

16 **Q.** You've said that you were not aware of whether
 17 Ms Crichton had herself any experience in criminal
 18 litigation?

19 **A.** Correct.

20 **Q.** Did you consider that to be appropriate, that there was
 21 one lawyer in POL responsible for the prosecution of
 22 subpostmasters but who was, in effect, working
 23 unsupervised by anyone with criminal litigation
 24 experience?

25 **A.** So that was the way it was dictated to me it would be

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1 **SIR WYN WILLIAMS:** Thank you, Mr Henry.
 2 So is it Ms Dobbin or Ms Oliver?

3 **MR STEVENS:** Thank you. There's one point I need to clarify
 4 now arising from those questions. It's an answer
 5 Mr Flemington gave on the [draft] LiveNote, page 95,
 6 line 18. Mr Flemington you said:
 7 "But there was a point -- I think there was another
 8 email not in my bundle but someone else's where there's
 9 a thank you for involvement on *Misra* and I think have
 10 been on that and I remember contacting the person who
 11 sent it and said thank you for the sentiment but I'm
 12 absolutely not involved in the *Misra* case."

13 **A.** Yes.

14 **Q.** Can I check what bundle you're referring to?

15 **A.** Not in my bundle, I'm sorry.

16 **Q.** Yes, but you say "I think there was another email not in
 17 my bundle but someone else's"?

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

19 **Q.** Have you read someone else's bundle of documents for
 20 these Inquiry proceedings?

21 **A.** No, I haven't. I will have seen something on one of the
 22 publicly available live feeds.

23 **MR STEVENS:** Thank you.
 24 Sir, that was a simple point of clarification I
 25 wanted to make.

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1 set up. I had asked before separation, "Would we go and
 2 recruit a criminal lawyer?" and was told, no, that it
 3 had been agreed at quotes "a high level" that one lawyer
 4 was enough and that they were being transferred over
 5 from the Criminal Law Department.

6 **Q.** Do you agree that made POL Legal significantly reliant
 7 on the expertise and competence of Mr Singh?

8 **A.** To a degree but you have to consider that we also had
 9 Cartwright King and, subsequently Brian Altman reviewing
 10 the work of Cartwright King, if you will, and there was
 11 no restraint or limit on how much Cartwright King could
 12 be used or deployed in the business in relation to the
 13 criminal prosecutions.

14 **Q.** When criminal prosecutions came within your purview as
 15 Head of Legal, did you take any steps to understand or
 16 familiarise yourself with any of the criminal law upon
 17 which POL bought those prosecutions?

18 **A.** So, I would not say that they came within my purview.
 19 They were always to be supervised and within the purview
 20 of Susan Crichton.

21 **Q.** When they came within your team, then, did you take any
 22 steps to understand or familiarise yourself with any of
 23 the criminal law that was applicable?

24 **A.** I did get an initial briefing from Jarnail Singh on the
 25 overarching aspects of the criminal law, in relation to

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1 POL prosecutions but, again, I was not responsible for
 2 those -- the carriage of those prosecutions or the
 3 supervision of Mr Singh?
 4 **Q.** Did you ever review the POL prosecution files or dip
 5 sample the prosecutions that were being conducted?
 6 **A.** No, I did not.
 7 **Q.** In relation to Cartwright King, then, did POL have any
 8 arrangements for reviewing their work or sampling the
 9 files on cases that they were responsible for
 10 prosecuting?
 11 **A.** I can't recall the specific provisions of their retainer
 12 and their engagement letter.
 13 **Q.** All right. Can we turn, then, please to the Simon
 14 Clarke Advice. Do you recall that that was sent to you
 15 on 17 July 2013?
 16 **A.** I don't recall off the top of my head no, but --
 17 **Q.** Do you think that sounds about right or would you like
 18 to go to the email?
 19 **A.** May we go to the email, please? Sorry.
 20 **Q.** Of course. It's POL00192249, please. Thank you. If we
 21 can go down to the third email, please. So this is
 22 an email from Martin Smith to Susan Crichton copying
 23 you:
 24 "Susan
 25 "Please find attached Simon Clarke's Advice
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1 **Q.** Right. You respond to one of those email threads on
 2 17 July. Do you think that makes it more likely that
 3 you would have seen the Simon Clarke advice at the time
 4 it was sent to you?
 5 **A.** Not necessarily because -- I tell you why very
 6 specifically, in that I hated reading attachments on the
 7 BlackBerry. I would read cover-notes but attachments
 8 I found difficult to see with eyesight. So, for that
 9 reason, I would tend not to read attachments. In terms
 10 of the content of those other emails, there's
 11 a possibility I was at the con on 3 July and that
 12 matters got mentioned out of those. It's possible that
 13 matters got mentioned out of other discussions that
 14 happened in those first two weeks when I was in the
 15 office but I can't, hand on heart, specifically recall
 16 seeing the printed advice at this time.
 17 **Q.** All right. In terms of the substance of those
 18 discussions, then, can we please go to POL00407582,
 19 please. Thank you. This the attendance note that
 20 you've already been taken to --
 21 **A.** Yes.
 22 **Q.** -- of a conference at Bond Dickinson that you attended
 23 with Susan Crichton. It starts by saying:
 24 "I had some time with HF ..."
 25 Presumably that's you?
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1 concerning Gareth Jenkins.
 2 "Kind regards,
 3 "Martin."
 4 Do you recall receiving that on 17 July?
 5 **A.** I don't know because -- I don't recall receiving it
 6 sorry. I was on sabbatical by then.
 7 **Q.** Do you agree that, during the course of your sabbatical,
 8 you continued to engage with emails that were sent
 9 during that time?
 10 **A.** Very occasionally.
 11 **Q.** Did --
 12 **A.** Sorry, I'd been given a specific lecture by Ms Crichton
 13 to try to not look at the BlackBerry because I'd already
 14 been raising issues about splitting up my role.
 15 **Q.** We can go to some examples, if necessary, but do you
 16 agree that those emails that you did engage with
 17 involved correspondence with Susan Crichton, Jarnail
 18 Singh, Rodric Williams, lawyers from Bond Dickinson,
 19 lawyers from Cartwright King?
 20 **A.** I think there were about three or four emails, from my
 21 recollection.
 22 **Q.** Do you recall that they concerned topics such as the
 23 review of criminal cases, questions of disclosure, the
 24 instruction of the criminal QC?
 25 **A.** Yes, they may have done.
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1 **A.** Yes.
 2 **Q.** "... before Susan Crichton joined us", and there was
 3 a discussion about Cartwright King and Rob Wilson.
 4 If we go down then, please, to point 6, and here
 5 it's recorded:
 6 "The real worry was around the Fujitsu expert who
 7 appeared to have known of some of the problems but not
 8 referred to them in his report or statement even though
 9 they could be dismissed. There are non-disclosure
 10 issues here. They are looking at replacing that expert
 11 with somebody else."
 12 Do you recall that being a feature of the
 13 discussion?
 14 **A.** I don't recall it specifically.
 15 **Q.** Do you agree that that seems to indicate that, even if
 16 the Simon Clarke Advice was something you didn't engage
 17 with during your sabbatical, you must have been aware
 18 that there was a real worry within POL about Mr Jenkins'
 19 statements being used in previous prosecutions, that
 20 these concerns related to non-disclosure of the bugs
 21 revealed to Second Sight and that there was
 22 an understanding that he could not be used as an expert
 23 in prosecutions going forward.
 24 **A.** It's possible, yes, but I would have expected that Susan
 25 Crichton was then dealing with that.
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1 **Q.** You've agreed with questions from Counsel to the
 2 Inquiry, that, once knowledge of those concerns came to
 3 POL, it would be very important for the Post Office to
 4 understand how Mr Jenkins had been instructed; do you
 5 remember giving that evidence?
 6 **A.** I don't but, yes, if you ...
 7 **Q.** Your evidence is that you would have expected
 8 Ms Crichton to do that; is that right?
 9 **A.** Yes.
 10 **Q.** Did you take any steps to understand what investigations
 11 she had undertaken or what she had learned of those
 12 features?
 13 **A.** I can't recall that being discussed when I came back.
 14 That's not to say it wasn't.
 15 **Q.** Did you, before you left or when you came back, ever ask
 16 to see any instructions which POL or Cartwright King had
 17 provided to Mr Jenkins?
 18 **A.** I can't recall, sorry.
 19 **Q.** You've said you can't remember speaking to Mr Singh
 20 about how he instructed Mr Jenkins. Do you remember
 21 speaking to the external lawyers at Cartwright King
 22 about whether Mr Jenkins had been instructed about his
 23 expert duties of disclosure?
 24 **A.** I don't specifically remember, no.
 25 **Q.** Did the issues that were being raised about Mr Jenkins

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1 addressed to Fujitsu, which Mr Williams said were:
 2 "... to put us 'on the record' with Fujitsu about
 3 the issues raised in Second Sight's Interim Report."
 4 One is described a "shot across the bow"; the other
 5 as a "letter of claim".
 6 Despite this being during the period of your
 7 sabbatical, do you agree you appear to reply on the same
 8 day to ask whether the draft documents have been
 9 discussed within Legal? That's the next email up, if we
 10 can scroll up, please.
 11 **A.** Yes, I do.
 12 **Q.** If we can please go to one of the attachments, which is
 13 POL00140620, and page 2, paragraph 4 -- thank you -- we
 14 see there that it's said:
 15 "Post Office was therefore disappointed to discover
 16 that witness evidence prepared by Fujitsu may not have
 17 been fully disclosing historic (albeit known and
 18 resolved) defects. This has led to Post Office having
 19 to review all its historic criminal prosecutions for the
 20 last 3 years ... to ensure that it has not breached its
 21 duties of disclosure under the Criminal Court rules."
 22 Do you agree that your email we just looked at
 23 rather suggests that this was an attachment that you
 24 would have opened?
 25 **A.** I honestly didn't look at attachments and I -- so

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1 by Cartwright King, before and after the publication of
 2 the written advice by Simon Clarke, give rise to any
 3 concern on your part that they might be indicative of
 4 broader prosecutorial failings on the part of POL?
 5 **A.** No.
 6 **Q.** Do you think that was an oversight on your part?
 7 **A.** No, I just don't think I'd have thought about the point.
 8 **Q.** Were you aware of the obligations that POL held in
 9 relation to how they handled expert evidence in the
 10 course of criminal prosecutions?
 11 **A.** So that's why I felt we were taking expert advice from
 12 Cartwright King at this point, that any issues like this
 13 would be flushed out and then could be addressed.
 14 **Q.** Did you ever consider that an appropriate course might
 15 be to speak to Mr Jenkins in order to understand the
 16 circumstances in which he came to give evidence in these
 17 cases?
 18 **A.** Again, I suppose I would have thought that Susan
 19 Crichton was dealing with that. This was surfacing just
 20 before I was going away and she would have had conduct
 21 of it for the next six weeks.
 22 **Q.** Can we go to POL00193383, please. Thank you. If we can
 23 go to the third email, please, this is an email from
 24 Rodric Williams to Lesley Sewell copying Susan Crichton,
 25 Simon Baker and you. It attaches two draft documents

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1 I wouldn't have opened and seen this.
 2 **Q.** So is it something that you looked at when you returned
 3 to POL, after your period of sabbatical?
 4 **A.** I would have -- I remember speaking to Susan Crichton
 5 when I returned and, because, in the context she was
 6 resigning, there was very quickly activity around
 7 dividing up matters and responsibility for matters and
 8 I cannot remember this being assigned to me, in terms of
 9 progressing that -- if it was to be progressed, it was
 10 being progressed by someone else but I can't honestly
 11 remember.
 12 **Q.** Can you recall any discussion at all as to whether to
 13 write to Fujitsu in these terms?
 14 **A.** No, I can't.
 15 **Q.** What decision was ultimately made in that regard?
 16 **A.** I can't recall anything in that -- in relation to that,
 17 sorry.
 18 **Q.** Thank you. One final document from me, please. It's
 19 POL00155555. This is a handwritten note, we know that
 20 it was authored by Rodric Williams. The date of the
 21 note, at the top right-hand corner, appears to be
 22 2 September 2013, which was the Monday before you, in
 23 your statement, say that you returned from your
 24 sabbatical. You returned on 3 September; is that right?
 25 **A.** I think I may have returned on the 2nd.

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1 Q. All right. So you returned on the very day that this
 2 note appears --
 3 A. Yes.
 4 Q. -- to have been authored?
 5 A. Yes.
 6 Q. The note refers to conversations with Martin Smith of
 7 Cartwright King. If we can please go down to the bottom
 8 of page 1, do you see, in the right-hand box, the
 9 question:
 10 "What were we doing to instruct GJ?"
 11 A. Yes.
 12 Q. Do you understand that's likely to be a reference to
 13 Mr Jenkins?
 14 A. Yes, yeah.
 15 Q. Then, in the left-hand list, first arrow point down:
 16 "Don't think he's ever been advised of his duties."
 17 Do you see that?
 18 A. Yes.
 19 Q. Were the contents of this note ever discussed between
 20 you and Mr Williams?
 21 A. I can't recall discussing this at all.
 22 Q. Can you recall whether it was known within POL by
 23 September 2013 that POL had failed to instruct
 24 Mr Jenkins as an expert witness in his expert duties or
 25 that there was at least a very serious question as to

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1 thought about and worked on and discussed.
 2 **MS OLIVER:** Thank you. Those are my questions.
 3 **SIR WYN WILLIAMS:** Well, that's extremely good timing. So
 4 my gratitude to the representatives of the Core
 5 Participants who have tailored their questions to finish
 6 promptly at 1.00.
 7 So thank you, Mr Flemington, for coming to give
 8 evidence and providing a witness statement. I'm
 9 grateful for your participation in the Inquiry.
 10 **THE WITNESS:** Thank you, sir.
 11 **SIR WYN WILLIAMS:** Mr Stevens, 2.00?
 12 **MR STEVENS:** Yes, sir.
 13 **THE WITNESS:** Sir, may I just make one point --
 14 **SIR WYN WILLIAMS:** Yes.
 15 **THE WITNESS:** -- which is I had agreed with Mr Stevens that
 16 I would have actually like to say some words at the
 17 start to express how sorry I was.
 18 **SIR WYN WILLIAMS:** Well, please say what you wish to now.
 19 **THE WITNESS:** Thank you.
 20 So I just wanted to say how sorry, personally,
 21 I felt for all the pain and suffering that has been
 22 caused by this scandal to all the people who have
 23 suffered. I hope today that, in some small way, my
 24 witness appearance will help the Inquiry establish
 25 lessons learned.

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1 whether it had ever instructed him in that way?
 2 **A.** I would have -- I would have probably known of the issue
 3 *per se* but I can't recall what level of knowledge there
 4 was across POL, if that was your question, sorry.
 5 **Q.** Would you have regard it as significant information that
 6 you ought to have been told the contents of this note?
 7 **A.** Yes.
 8 **Q.** Do you know whether it was for this reason that a draft
 9 letter of claim was not sent to Fujitsu?
 10 **A.** No, I don't know.
 11 **Q.** Do you recognise that POL's failure, referred to in this
 12 note, to instruct Mr Jenkins in his expert duties and in
 13 accordance with their legal duties, was an exceptionally
 14 serious matter because it gave rise to real questions
 15 about the basic competency of its prosecutors?
 16 **A.** So, obviously, it's not my note and I didn't author it
 17 and I can see there it's talking about raising questions
 18 of what were we doing and don't think -- but I don't see
 19 it's conclusively coming to a conclusion that there is
 20 an issue there.
 21 **Q.** Do you think that the serious question over whether
 22 Mr Jenkins had been advised of his expert duties is
 23 something that POL ought to have treated with the utmost
 24 seriousness?
 25 **A.** Yes, but if I look at this note, the issue is being

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1 **SIR WYN WILLIAMS:** Thank you, Mr Flemington.
 2 All right. We will start again at 2.00.
 3 **MR STEVENS:** Thank you, sir.
 4 (1.01 pm)
 5 (The Short Adjournment)
 6 (2.00 pm)
 7 **MS PRICE:** Good afternoon, sir, can you see and hear us?
 8 **SIR WYN WILLIAMS:** Yes, I can, thank you.
 9 **MS PRICE:** May we please call Mr Bowyer.
 10 **HARRY BOWYER (affirmed)**
 11 **Questioned by MS PRICE**
 12 **MS PRICE:** Could you confirm your full name, please,
 13 Mr Bowyer?
 14 **A.** Yes, it's Harry Bowyer.
 15 **Q.** Thank you for coming to the Inquiry to assist it in its
 16 work. As you know, my name is Emma Price and I will be
 17 asking you questions on behalf of the Inquiry.
 18 You should have a hard copy of a witness statement
 19 provided by you to the Inquiry in front of you; do you
 20 have that?
 21 **A.** I have that.
 22 **Q.** It is dated 2 April 2024. If you turn to page 32 of
 23 that, please, does your copy have a visible signature?
 24 **A.** It does.
 25 **Q.** Is that your signature?

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- 1 **A.** It is my signature.
- 2 **Q.** I understand there is a correction to the statement
3 you'd like to make; is that right?
- 4 **A.** Yes. I state in paragraphs 26 and 69 that I wasn't
5 aware of the backdoor into the Horizon system until the
6 Deloitte report. I've seen emails since, which show
7 that I was told about it in November 2012.
- 8 **Q.** With that correction made, are the contents of that
9 statement true to the best of your knowledge and belief?
- 10 **A.** To the best of my knowledge and belief.
- 11 **Q.** That statement, for which the reference is WITN10990100,
12 is now in evidence and will be published on the
13 Inquiry's website in due course.
- 14 Starting, please, with your professional background.
15 You joined Cartwright King Solicitors in the summer of
16 2008, is that right --
- 17 **A.** That's correct.
- 18 **Q.** -- having been in practice at the independent Bar before
19 that since 1990?
- 20 **A.** Yes.
- 21 **Q.** Your practice at the independent Bar had been
22 exclusively criminal?
- 23 **A.** Exclusively criminal.
- 24 **Q.** You had been involved in both prosecution and defence
25 work?

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- 1 **A.** No, the expansion was at the time there was a proposal
2 that legal aid firms would be limited to a very few in
3 each legal aid area. So what they were trying to do was
4 put themselves in as many legal areas so they could bid
5 for the contracts.
- 6 **Q.** Did the fairly ruthless reorganisation you refer to have
7 any impact on the Post Office work which was being done
8 at the time by the Advocacy Department?
- 9 **A.** I don't think so.
- 10 **Q.** That can come down. Thank you.
- 11 Did members of the Advocacy Department prosecute
12 Post Office cases in both the Magistrates Court and the
13 Crown Court?
- 14 **A.** There was quite a lot of work that was prosecuted in the
15 Magistrates Court and the Crown Court but most of the
16 Crown Court work went out to external counsel.
- 17 **Q.** The Advocacy Department was based in the Nottingham
18 office; is that right?
- 19 **A.** That's correct.
- 20 **Q.** The head of department was initially one of the equity
21 partners, Steve Gelsthorpe?
- 22 **A.** That's correct.
- 23 **Q.** Then Andy Cash took on the role, followed by Mark
24 Hopwell?
- 25 **A.** That's right.

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- 1 **A.** Indeed.
- 2 **Q.** You say in your statement that when you joined
3 Cartwright King, you were the first employed barrister
4 in the firm; is that right?
- 5 **A.** Yes, I was.
- 6 **Q.** But in the few years which followed, the firm expanded
7 their advocacy department by employing a large number of
8 barristers and solicitors with higher rights to cover
9 almost the entirety of their Crown Court work?
- 10 **A.** That's correct.
- 11 **Q.** Can we have on screen, please, paragraph 5 of
12 Mr Bowyer's statement, that's page 2. At paragraph 5
13 you say this:
- 14 "When I joined [Cartwright King] they had 3 offices,
15 Nottingham, Derby and Leicester. They embarked on
16 a period of rapid expansion by acquiring other firms of
17 solicitors. At their peak they had around 20 offices
18 from London to Newcastle. This involved a great deal of
19 fairly ruthless reorganisation as they cut away the dead
20 wood."
- 21 Thinking back to the rapid expansion that took
22 place, was the reason behind this that it would enable
23 Cartwright King to prosecute Post Office cases in-house?
- 24 **A.** No.
- 25 **Q.** No?

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- 1 **Q.** You say in your statement that it was Andy Cash who
2 introduced the then Royal Mail Group work to Cartwright
3 King?
- 4 **A.** That's right.
- 5 **Q.** He was based in the Derby office but spent more time in
6 the Nottingham office when he became Head of the
7 Advocacy Department?
- 8 **A.** That's correct.
- 9 **Q.** Was there any provision at Cartwright King for training
10 in relation to private prosecutions and, in particular,
11 prosecution disclosure obligations in private
12 prosecutions?
- 13 **A.** There was very little.
- 14 **Q.** Very little as in none or some?
- 15 **A.** Well, as far as I was concerned, the private
16 prosecutions that they did was the Royal Mail work
17 initially. They did some RSPCA work and Andy Cash
18 brought in the POL work, I think, around about 2012.
19 But as far as actual training was concerned, I certainly
20 wasn't trained and I don't know what happened to those
21 who were doing the POL work because it was being done in
22 other offices apart from mine.
- 23 **Q.** What were you told when you were first introduced to the
24 Royal Mail Group and then later Post Office Limited work
25 about the basis on which prosecutions were brought by

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1 the Post Office and the history of this?
 2 **A.** I'm not sure I was told very much at all.
 3 **Q.** You were aware, though, that the Post Office was
 4 bringing private prosecutions --
 5 **A.** Oh, absolutely, yes.
 6 **Q.** -- and that was the work you were doing?
 7 **A.** Yes.
 8 **Q.** At the time, did you recognise any risk arising from the
 9 Post Office being simultaneously victim, investigator
 10 and prosecutor?
 11 **A.** Well, at the time, I wasn't really involved with it. If
 12 I'd addressed my mind to it then, yes, I probably would
 13 have seen the difficulties that you've put forward. But
 14 the Post Office work that -- the Royal Mail Group work
 15 initially tended to be postmasters who -- or Royal Mail
 16 workers who were stealing from the post and then, in due
 17 course, the POL work was the work that this Inquiry is,
 18 in fact, looking into. But, as far as I was concerned,
 19 I didn't do very much of it at all, until Andy Cash came
 20 into the Advocacy Department and then he started to pick
 21 the brains of the various advocates there about various
 22 issues and would ask us to write the odd advice,
 23 charging advice, et cetera.
 24 **Q.** You address at paragraph 31 of your statement the
 25 training you received on the Horizon system. Can you

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1 above those as a member of the Advocacy Department?
 2 **A.** There were various responsibilities: file reviews was
 3 one of the main ones, so we had to review the files of
 4 other people in the department.
 5 **Q.** But you say you held no equity in the firm; is that
 6 right?
 7 **A.** No, no. It was more of a rewards that came up with the
 8 rations, rather than a pay rise.
 9 **Q.** You resigned from Cartwright King in December 2015; is
 10 that right?
 11 **A.** That's right.
 12 **Q.** What was the reason for your resignation?
 13 **A.** Myself, Martin Smith and Simon Clarke wanted to set up
 14 our own business.
 15 **Q.** Is that something you went on to do?
 16 **A.** That's something we went on to do.
 17 **Q.** Turning, please, to your involvement in the Royal Mail
 18 Group and, later, Post Office Limited work and dealing
 19 first with the period prior to the Interim Second Sight
 20 Report coming to your attention in 2013. Could we have
 21 paragraph 8 of Mr Bowyer's statement on the screen,
 22 please, that is page 2. On the last line on this page
 23 you say:
 24 "The RMG work was more provincial at that stage but
 25 in 2012 Andy Cash bought the POL work into the firm

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1 help with when you received this training? Do look to
 2 the statement if you need to?
 3 **A.** I can't recall. I think it would have been about 2012.
 4 **Q.** You say that training did not cover the reconciliation
 5 of balances; what did it cover, can you recall?
 6 **A.** Well, I can't remember where it was. It was somewhere
 7 up north. But they had a Horizon system and,
 8 effectively, myself and a number of external counsel
 9 were actually shown how the system worked, effectively
 10 from a cashier's point of view.
 11 **Q.** Were members of the Advocacy Department responsible for
 12 keeping up to date with their own continuing
 13 professional development obligations?
 14 **A.** To an extent, yes.
 15 **Q.** Was there any oversight of that by --
 16 **A.** Yes, there was. You had to show that you'd done your
 17 CPC.
 18 **Q.** You say in your statement that you were made a director
 19 of Cartwright King during the period covered by the
 20 Inquiry?
 21 **A.** Yes.
 22 **Q.** Can you recall when it was that you became a director?
 23 **A.** I can't, I'm afraid.
 24 **Q.** You say you were one of around 30 directors. What
 25 responsibilities did you have as a director, over and

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1 which was nationwide in nature."
 2 You say that the Post Office work was nationwide.
 3 Can you help with the scope of Cartwright King's
 4 instructions to act for the Post Office and, in
 5 particular, whether the general instruction of
 6 Cartwright King covered criminal cases in Scotland and
 7 Northern Ireland.
 8 **A.** The answer is I can't help with that very much. We
 9 didn't tend to do Scotland and Northern Ireland. That
 10 was outsourced to other solicitors. Obviously, you've
 11 got the Scottish law problem, which none of us were
 12 capable of doing Scottish law.
 13 **Q.** Certainly by around 2013, that was a firm called BTO
 14 Solicitors from Scotland?
 15 **A.** Those are the ones, yes.
 16 **Q.** Can you recall the names of any other firms that were
 17 involved, either for Scotland or --
 18 **A.** I can't recall. BTO was the one we dealt with most.
 19 **Q.** What was your understanding of the prosecution process
 20 for cases in these jurisdictions?
 21 **A.** I didn't have an understanding at all, I'm afraid.
 22 **Q.** Looking, then, at paragraph 9 of your statement. You
 23 say:
 24 "The bulk of the POL/RMG work was done by Martin
 25 Smith, based in Derby and Andrew Bolc based in

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1 Leicester. They would prepare the cases and brief them
2 out to counsel. The RMG work involved some of the same
3 type of cases as the later POL work but also involved
4 postmen stealing from the mail."

5 Then paragraph 10:

6 "When he was in Nottingham Andy Cash would ask my
7 opinion about the POL/RMG cases both informally, and on
8 occasion he would ask me to settle an indictment or
9 an advice on evidence. This would involve the file
10 being brought to Nottingham so that I could work on it.
11 It would then be returned to the lawyer working on it
12 and I would be unlikely to see it again as it would
13 usually be briefed out to counsel."

14 So that's what you were referring to earlier in
15 terms of cases going to counsel --

16 **A.** Essentially, yes.

17 **Q.** -- in Crown Court work.

18 You address a case you prosecuted involving
19 a manager of a Crown Post Office at paragraph 12 of your
20 statement and you say it was a case that post-dated the
21 cessation of prosecution of Horizon cases and it was
22 a case that didn't rely upon Horizon evidence.

23 **A.** Yes.

24 **Q.** With this exception, is it your evidence that you did
25 not prosecute a trial?

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1 were you not taking direct instructions from the Post
2 Office?

3 **A.** No, I would be instructed from someone within Cartwright
4 King.

5 **Q.** I see. What was your working relationship with Mr Singh
6 like?

7 **A.** Pretty limited. I met him, I think, on two or three
8 occasions, once when Simon Clarke and I went down to
9 their Old Street offices in London and a couple of times
10 when he came up to Nottingham or Derby, and I spoke to
11 him on the phone and emailed. Occasionally, he would
12 email with questions and the like and I would respond
13 but the main point of contact between Cartwright King
14 and the Post Office was Martin Smith.

15 **Q.** You say at paragraph 38 of your statement that you were
16 aware from the beginning that the Horizon system was
17 being challenged by the Justice for Subpostmasters
18 group. By "from the beginning", do you mean from the
19 point that you became involved in any Post Office
20 prosecutions relying on Horizon evidence?

21 **A.** Yes, I only really became involved in about 2012.

22 **Q.** What about the system did you understand was being
23 challenged?

24 **A.** I understood that there were allegations that it was
25 throwing out false figures.

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1 **A.** I never prosecuted a trial for Post Office, I never had
2 conduct of a prosecution brief as counsel or as
3 litigator. I think I did a sentence in Nottingham
4 because it was in Nottingham and that's where I was
5 based but, apart from that, I don't think I did any
6 other court work.

7 **Q.** So this case at paragraph 12, when you so you prosecuted
8 it, are you saying it's not one that went to trial?

9 **A.** It pleaded.

10 **Q.** Okay. I understand. That can come down now. Thank
11 you. You say at paragraph 18 of your statement that
12 your direct contact with Post Office personnel was
13 fairly limited but that you had dealings with Jarnail
14 Singh, who you understood to be Head of Crime at Post
15 Office Limited. Who did you obtain instructions from at
16 the Post Office?

17 **A.** Well, I wasn't actually, as I said, instructed in any
18 cases. So I became involved either because Andy Cash
19 would ask me to do something on a case or ask me my
20 opinion about one of the cases, and I would also --
21 I was also involved during the sift process, after the
22 Second Sight review came out. But, again, I would have
23 been asked by either Andy Cash or Simon Clarke to do the
24 work that I was doing.

25 **Q.** So in the instances where you provided written advice,

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1 **Q.** Did you consider, at the time you provided advice on
2 Post Office prosecution cases, that you were under
3 a duty to act as a minister of justice in preference to
4 the interests of the client who had instructed you in
5 relation to the prosecution --

6 **A.** Yes, certainly.

7 **Q.** -- that this entailed observing the highest standard of
8 integrity and having regard for the public interest --

9 **A.** Yes.

10 **Q.** -- and that you owed a duty to the court to ensure that
11 the proceedings were fair?

12 **A.** Yes.

13 **Q.** Prior to being alerted to the content of the Interim
14 Second Sight Report, did you ever question whether the
15 evidence generated by the Horizon system could be relied
16 upon for the purposes of prosecutions?

17 **A.** Yes, we were assured, and it was our instructions, that
18 the system was robust.

19 **Q.** Who did you ask, if you questioned it, whether the
20 evidence could be relied upon?

21 **A.** The various caseworkers that -- the Investigators that
22 we were in touch with; later on, the various Post Office
23 lawyers that we came across. But they were all --
24 I mean, one kept an eye on it because this was something
25 that we were going to have to counter. So, as far as

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1 allegations that the system wasn't robust, we were
 2 keeping our eyes out to see if there was any truth in
 3 it, if there were any patterns.

4 **Q.** Did you receive assurances from Jarnail Singh?
 5 **A.** I would have done, yes.

6 **Q.** You refer in a number of places in your statement to
 7 assurances that you received from all sides that the
 8 system was robust and that there was nothing that could
 9 undermine the integrity of the system. Were these
 10 assurances ones given before the Interim Second Sight
 11 Report?
 12 **A.** Yes.

13 **Q.** In this period, that is prior to the Interim Second
 14 Sight Report, did you ever have difficulty getting
 15 something from the Post Office in relation to
 16 prosecutions?
 17 **A.** Well, I was doing remarkably little of the work before
 18 the Second Sight Report, so the answer is no. If
 19 I wanted information, I could get it but, as I say,
 20 I didn't hold the brief and I wasn't litigating the
 21 cases. It was a question that people would ask me to
 22 advise on a certain part of a case. It may be that they
 23 wanted an interim advice or they may want an advice on
 24 a particular thing; it might have been that the advice
 25 they asked for was verbal; I would be asked a question

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1 and when we'd effectively stopped prosecuting cases.

2 **Q.** Can you help with what you had in mind when you refer to
 3 proper oversight from people with actual experience of
 4 prosecuting cases?
 5 **A.** Well, there are various things, disclosure of course is
 6 a main one. Charging advices is a second one. You
 7 know, as far as the two individuals who were preparing
 8 the cases, as I said, I don't think they had any
 9 experience of preparing prosecution cases until they
 10 were given this role at Cartwright King.

11 **Q.** Who should have provided this oversight, do you think?
 12 **A.** Well, it should have been someone, their Head of
 13 Department. Having them in different offices can't have
 14 helped. There should have been a Post Office department
 15 where they were in the same room, where they were
 16 actually able to pool what knowledge they had together.
 17 But that wasn't the case.

18 **Q.** It may follow from your answer given just now, but was
 19 this lack of proper oversight something which you
 20 recognised at the time that you were doing Post Office
 21 work?
 22 **A.** Well, it -- I became more aware of it after the Second
 23 Sight came in and we were doing the Sift Reviews, as to
 24 what was actually going on. But, as I said, I was based
 25 in Nottingham; they were in different counties.

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1 by Andy Cash and I would answer it there and then but,
 2 as I said, I wasn't actually working on these cases
 3 a very great deal, I had a full caseload of the defence
 4 work that I was actually employed by Cartwright King to
 5 do.

6 **Q.** Could we have on screen, please, paragraph 21 of
 7 Mr Bowyer's statement. That's page 5 towards the
 8 bottom, please. At paragraph 21 you say this:
 9 "It is probably fair to say that the [Cartwright
 10 King] Post Office department would have benefited from
 11 proper oversight from the earliest stages from people
 12 with actual experience of prosecuting cases rather than
 13 different individuals in different offices doing their
 14 own thing."
 15 What do you mean by "different individuals in
 16 different offices doing their own thing"?
 17 **A.** Well, as I said, the bulk of the work was done by Martin
 18 Smith in Derby and Andrew Bolc in Leicester. When I was
 19 first aware of the Post Office work, I wasn't -- I was
 20 aware that they were doing it and I was aware that they
 21 were briefing external counsel. I didn't realise that
 22 both had such limited prosecution experience at the time
 23 and, as far as that was concerned, you know, that
 24 plainly wasn't a safe state of things. But I discovered
 25 about that much more when we were reviewing the cases

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1 **Q.** Did you raise it at the time with anyone else within
 2 Cartwright King as a suggestion?
 3 **A.** Not at the time, no, because, as I said, by the time it
 4 really became apparent, we weren't prosecuting any more.

5 **Q.** Could we have on screen, please, reference POL00293276.
 6 This is a letter from Cartwright King to Rodric Williams
 7 from the Post Office. It's dated 13 January 2020, so
 8 post-dates your departure by around four years.
 9 **A.** Yeah.

10 **Q.** I'd like to ask you, however, about an observation made
 11 in this letter about the relationship between Cartwright
 12 King and the Post Office. The context for this letter
 13 is a review by Cartwright King of the work it had done
 14 for the Post Office since April 2012, which concluded
 15 that there were a number of improvements and changes in
 16 practice which could be made.
 17 Going, please, to point 3 on the second page of this
 18 document, the author says this:
 19 "Further to the two points noted above, we are
 20 becoming increasingly concerned at the somewhat
 21 disjointed way in which we presently approach POL work.
 22 This arises because there is no single dedicated point
 23 of contact within [Cartwright King] for [Post Office
 24 Limited], as witnessed by the common use of cc'd emails
 25 to all three [Cartwright King] lawyers undertaking [Post

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1 Office Limited] work. The problem here is that a lack
 2 of continuity on individual pieces of work, together
 3 with deficit in oversight over the landscape in which
 4 [Cartwright King] meets [Post Office Limited]
 5 requirements and advises thereon. In plain English,
 6 this means that there is an increasing risk that advice
 7 on one topic might fail to take into account the impact
 8 of that topic on another area of [Post Office Limited]
 9 work, with the consequent risk that [Post Office
 10 Limited], and [Cartwright King], are exposed. Of
 11 particular concern here is [Post Office Limited's]
 12 disclosure duties arising out of the recent judgment,
 13 and the need to advise [Post Office Limited] on current
 14 and future Crown Prosecution Service prosecutions."

15 Do you agree with the assessment here of the
 16 potential consequences of a lack of oversight and, in
 17 particular, the risk that advice on one topic might fail
 18 to take into account the impact of that topic on another
 19 area of Post Office work?

20 **A.** Yes.

21 **Q.** Would you agree that that risk was relevant to Post
 22 Office disclosure duties in 2012 and onwards, not just
 23 at this point --

24 **A.** Absolutely, yes.

25 **Q.** -- in 2020?

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1 POL00424121. This is the covering email from you to
 2 Robert Daily, dated 28 October 2011. Was Robert Daily
 3 the Investigator in the case?

4 **A.** Very probably but I can't recall.

5 **Q.** It is copied to Rob Wilson, Head of the Royal Mail Group
 6 Criminal Law Team at the time; is that right?

7 **A.** I think so. I think this is probably still under the
 8 RMG umbrella.

9 **Q.** It is also copied to Andy Cash and Rachael Panter. Can
 10 you help with what Rachael Panter's role was at the
 11 time?

12 **A.** Well, at the time, I wasn't aware of her role. She was
 13 based in Leicester with Andrew Bolc. She was, as
 14 I understand it -- I think she passed her Bar exams but
 15 I think she was a comparative baby to the role that she
 16 appears to have been conducting.

17 **Q.** Going, then, to the initial advice itself, could we have
 18 that on screen. The reference is POL00424122. Can you
 19 help, having had the opportunity to read this document,
 20 with the purpose of this initial advice and, in
 21 particular, was it an advice on whether the prosecution
 22 test was met in the case?

23 **A.** Yes. Having read it, I can see that there is no
 24 discussion of the evidential test or the public interest
 25 test, which, looking back on it, there should have been.

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1 **A.** Yes.

2 **Q.** Is this the type of risk you had in mind when you flag
 3 up in the statement to the Inquiry the lack of proper
 4 oversight?

5 **A.** Yes.

6 **Q.** Is it a risk that you recognised at the time?

7 **A.** Like -- as I said, my appreciation of how Cartwright
 8 King were doing it increased when I got into the sift
 9 work because that was when I was actually concentrating
 10 on reviewing the cases. But, yes, it was plainly
 11 unsatisfactory.

12 **Q.** That document can come down now. Thank you.

13 I'd like to move, please, to the advice you gave in
 14 the case of Kim Wylie. You deal with your advice dated
 15 11 July 2012 at paragraph 39 of your statement, if you
 16 wish to follow. At the time of providing your
 17 statement, you had not seen your earlier advice, which
 18 is referred to in that July 2012 advice. The Inquiry
 19 has relatively recently located that initial advice and
 20 I understand that that has been provided to you.

21 **A.** I've seen it.

22 **Q.** That is, in fact, dated October 2011 rather than 2010?

23 **A.** Yes.

24 **Q.** I think that 2010 date comes from the date given in the
 25 July 2012 advice. Could we have on screen, please,

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1 It's not to say that I wasn't aware of those two
 2 particular issues but I should have discussed them in
 3 the advice. It would have been an advice that would
 4 have been at the very early stages as to what -- the
 5 evidence we required and the charges that we should
 6 prefer.

7 **Q.** You set out the prosecution case in the first paragraph,
 8 in that:

9 "At the end of June 2010, Ms Wylie received a letter
 10 informing her that Winlaton Post Office would be
 11 migrating to Horizon Online. On 9 July 2010 she
 12 reported a £33,142.96 shortage in trading period 4. She
 13 could not explain how the shortage had occurred. The
 14 HOL Advisor, Brian Cordery, reported concerns that he
 15 had been presented with money twice whilst conducting a
 16 cash check prior to migration. On 10 September 2010
 17 an audit was carried out at Winlaton sub post office
 18 branch by Mr Ged Dresser and Bryan Marshall, Post Office
 19 Field Support Advisors, which revealed a deficit in the
 20 accounts of £5,434.93."

21 There is then a summary of what Ms Wylie said in
 22 interview, which included the fact that she could not
 23 explain the shortages as she hadn't done anything
 24 incorrectly. She says she was aware that the cash would
 25 be checked after she received the letter about migration

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1 to Horizon Online. She reported the cash shortage after
2 receipt of this letter.

3 Just going over the page, please. She denied theft
4 and false accounting and cast doubt on the integrity of
5 the Horizon system, blaming it for the error.

6 You then say this of the defence case:

7 "The most obvious route for the defence in this case
8 is to suggest that the Horizon system is flawed or
9 possibly that another member of staff stole the money."

10 Just pausing there, this initial advice pre-dates
11 the instruction of Second Sight?

12 **A.** Yes.

13 **Q.** You do not seem surprised in this advice that Ms Wylie
14 was blaming the Horizon system for the loss. Does that
15 mean that this was not the first case in which you were
16 involved where a subpostmaster was attributing
17 a shortfall to the problems with the Horizon system?

18 **A.** It was certainly within my knowledge that people were
19 blaming the Horizon system at that stage, yes.

20 **Q.** Can you recall how many cases of this nature you had
21 been involved with previously?

22 **A.** As I said, very few at the time.

23 **Q.** You deal with the statements which would be needed in
24 the next paragraph and, at the last bullet point in this
25 section, you say:

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1 You cite there the *Eden* case.

2 **A.** Mm.

3 **Q.** This was a case in which a subpostmaster had denied
4 theft and false accounting in interview and had raised
5 the integrity of the Horizon system, blaming it for the
6 error in interview, correct?

7 **A.** I can't recall this, I haven't read *Eden* for 12 years.

8 **Q.** Well, just going over the paragraphs that we have, this
9 was something that had been raised in interview by the
10 subpostmasters?

11 **A.** Oh, absolutely. Yes, of course.

12 **Q.** There is no suggestion, on the face of this initial
13 advice, though I appreciate you may have had limited
14 information at an early stage, but there's no suggestion
15 here that there had been any investigation of whether
16 the Horizon system was working properly in Ms Wylie's
17 branch; would you agree with that --

18 **A.** Yes, we're talking very early stages. This is
19 an initial advice. I think the advice is dated -- what,
20 October, is it -- and the audit was September.

21 **Q.** In October, yes, October 2012?

22 **A.** So we're at an extremely early stage of the case.

23 **Q.** Would you have expected the Investigator in the case to
24 look into whether the Horizon system was working
25 properly in Ms Wylie's branch?

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1 "We will need to prove the integrity of the Horizon
2 system as there appears to be apocryphal evidence on the
3 Internet that it is causing big losses to postmasters."

4 Can you recall what the evidence on the Internet
5 that the Horizon system was causing big losses to
6 postmasters was?

7 **A.** I'm afraid I can't but the subpostmasters were making
8 a lot of noise at this particular stage and, obviously,
9 we'd heard about it.

10 **Q.** Can you recall the basis for your conclusion that it was
11 apocryphal?

12 **A.** Well, because we had no evidence that the Horizon system
13 at that stage was producing these errors, apart from the
14 fact that people said it was.

15 **Q.** At the time, did you consider the alternative
16 explanation that those saying that the Horizon system
17 was causing big losses might be right?

18 **A.** Yes, we certainly considered that and we asked about it.
19 But our instructions were that the system was robust.

20 **Q.** You go on, under "Discussion", to conclude that, "The
21 case could properly be charged as two counts of theft",
22 and noting that:

23 "The courts generally do not like theft and false
24 accounting charges to be charged in tandem for the same
25 course of conduct."

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1 **A.** I would have expected, as I said earlier in the advice,
2 that we would need to show that the system was working
3 properly.

4 **Q.** It isn't something that you advised should be done in
5 this advice. Can you recall whether there was any
6 discussion about whether there should be --

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

8 **Q.** It was a reasonable line of inquiry, wasn't it, that
9 should have been pursued, the issue having been raised
10 in interview, as a line of inquiry which might point
11 away from the guilt of the suspect; do you accept that?

12 **A.** Yes.

13 **Q.** Did you recognise that at the time?

14 **A.** Yes, I'm sure I did.

15 **Q.** What did you do to ensure that that investigation
16 happened?

17 **A.** Well, nothing because I wrote this advice. It then went
18 off to whichever of the CK solicitors who was
19 prosecuting the case did, and I don't think I saw much
20 more of it until Andy Cash asked me to do the second
21 *Wylie* advice. As I said, this wasn't my case. I was
22 asked to do the charging advice but I wasn't in charge,
23 I wasn't the case -- the file owner.

24 **Q.** You've already recognised that there is no reference to
25 the evidential or public interest tests for prosecution

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1 in this initial advice. What prosecution test were you
2 applying when you concluded the case could be properly
3 charged as theft?

4 **A.** Well, I would have had those two tests in mind. As
5 I conceded, there should have been discussion of those
6 two factors in this advice. This advice, to that
7 extent, is sub par.

8 **Q.** Your advice in relation to statements which would need
9 to be sought, including you flagging up that "We will
10 need to improve the integrity of the Horizon system".

11 Who did you mean by "we"?

12 **A.** The prosecution.

13 **Q.** Did this include Cartwright King?

14 **A.** Yes.

15 **Q.** Was it your view that, if evidence of the integrity of
16 the Horizon system overall could be obtained, then this
17 would obviate the need for any specific line of inquiry
18 as to the operation of Horizon in Ms Wylie's branch?

19 **A.** No.

20 **Q.** Did you consider at the time of providing this initial
21 advice what the Post Office's disclosure obligations
22 were in the case, in respect of other cases in which
23 subpostmasters were raising Horizon integrity issues?

24 **A.** Not at this particular stage, no, because, as I said,
25 this is an extremely early advice. Statements hadn't

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1 more recent events at paragraph 2. You say this:

2 "The position of Post Office Limited has, up until
3 now, always been robust. When the system has been
4 challenged in the criminal courts the system has always
5 been successfully defended. I understand that the Post
6 Office has announced that it has appointed independent
7 forensic accountants, Second Sight Limited, to conduct
8 an independent review of 10 cases based on the Horizon
9 system. Whether this announcement was well considered
10 or not is not an area that I intend to address but the
11 bell cannot be unrung and there will be consequences
12 that will have to be dealt with."

13 Before we deal with the substance of this paragraph,
14 I'd like to explore, please, what prompted this
15 particular advice. Could we have on screen, please,
16 POL00141393. This is a letter dated 6 July 2012. It is
17 from Ms Wylie's defence solicitors to Cartwright King.
18 It reads:

19 "Our client has brought to our attention that the
20 Post Office Management have decided to allow forensic
21 accountants to examine Horizon. This decision appears
22 to have been made after our client appeared in the
23 Magistrates Courts for the first hearing.

24 "In view of the decision that has now been made, as
25 of course our client is maintaining she has not stolen

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1 been got in and the initial bundle, I don't think, had
2 been prepared. So no. But, as I said, I wasn't running
3 the case and I wasn't responsible for the disclosure
4 schedules.

5 **Q.** As a general principle, at the time, would you have
6 understood that subpostmasters raising Horizon integrity
7 issues in other cases might be disclosable in this one?

8 **A.** They might be disclosable, yes.

9 **Q.** Would it depend on the particular circumstances of the
10 case as to whether they would be?

11 **A.** Well, it would depend on the defence raised in the
12 defence statement. Obviously, in those stages, at that
13 stage we were looking at, obviously, primary disclosure
14 which was matters which would undermine our case and, as
15 I understood it at the time, there hadn't been
16 a successful challenge of the Horizon system. We were
17 not told about any bugs at the time.

18 **Q.** Moving, please, to your advice in the Wylie case dated
19 11 July 2012. Could we have that on screen, please.

20 The reference is POL00180894.

21 Going first, please, to the bottom of the third
22 page, we can see there the date of the advice, 11 July
23 2012 and your name at the bottom. Going back to the
24 first page, please, you refer back to your initial
25 advice in the first paragraph and then you deal with the

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1 any money and that the fault is due to the Horizon
2 system, what is your position with regards to how this
3 matter is now to proceed.

4 "Clearly, we would submit that if the Post Office
5 are now looking at the possibility that there may be
6 an error in the Horizon system then this case should not
7 proceed further at this time.

8 "Perhaps you could advise us as to what stance is to
9 be taken to enable us to consider matters further with
10 regards to possible abuse of process etc arguments that
11 may be advanced on behalf of our client."

12 This letter pre-dates your advice by five days.
13 Were you advising in response to this letter?

14 **A.** I may have been. I didn't see the letter but Andy Cash
15 asked me to write the advice and he may have been
16 triggered by that letter.

17 **Q.** Could we have the advice back on screen, please. It's
18 POL00180894. Could we turn, please, to the third page
19 of this document, which is subparagraph 6(iii) and here
20 you say this:

21 "We should ascertain why we have decided to instruct
22 Second Sight Limited. I presume that it was not because
23 of any doubt that we had in our system. If so we should
24 be robust in stating that that is so. I presume our
25 thinking was that as we have nothing to hide we have no

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1 objection to our practices being scrutinised in which
2 case we should say so."

3 Does it follow from this that, at the time of
4 providing this advice, you did not know the basis on
5 which Second Sight had been instructed to undertake its
6 investigation.

7 **A.** I didn't.

8 **Q.** Did you ask for any information about the basis on which
9 Second Sight was instructed from the Post Office before
10 providing the advice?

11 **A.** I didn't.

12 **Q.** Were you provided with any by anyone else?

13 **A.** No.

14 **Q.** In circumstances where you were providing this advice,
15 do you think you should have sought further information
16 as to the basis of Second Sight's instruction?

17 **A.** Oh, in the light of everything I now know, then yes,
18 certainly.

19 **Q.** We will come on to the detail of your advice in a moment
20 but, in general terms, you were advising, were you not,
21 on the approach the Post Office ought to take to ongoing
22 prosecutions which relied upon Horizon data; is that
23 fair?

24 **A.** Yes.

25 **Q.** In light of that, do you think that you should have

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1 **Q.** Did anyone tell you about the acquittal of Suzanne
2 Palmer in 2007, having also raised Horizon issues?

3 **A.** Again, if they did, I can't remember it.

4 **Q.** Well, your understanding in both your statement and set
5 out here, seems quite clear, that the message to you was
6 the system had always been successfully defended?

7 **A.** Yes.

8 **Q.** It was not a criminal case but did anyone tell you about
9 the claim brought by the Post Office against Julie
10 Wolstenholme, which was settled in 2004 after a joint IT
11 expert provided an opinion to the effect that the
12 technology installed at the branch was clearly
13 defective?

14 **A.** No, I -- if they did, I can't remember it.

15 **Q.** Also at paragraph 36 of your statement, you say you were
16 told that there were never any alleged surplus figures
17 generated by the system?

18 **A.** Yes.

19 **Q.** Again, can you recall who told you that?

20 **A.** It would have been the Investigators or what I picked up
21 from the people who were doing the Post Office cases.

22 **Q.** Can you think of a single person who told you that?

23 **A.** I can't recall no but I can recall that that's what
24 I was told.

25 **Q.** Similarly at paragraph 36, you say that very few of

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1 recognised at the time the need to seek more information
2 before providing this advice?

3 **A.** Well, the difficulty is this advice is, I think, almost
4 12 months before the Second Sight Interim Review, and
5 the forensic accountants of Second Sight, when they made
6 their interim review, they came out with the fact that
7 they could find no systemic fault in the Horizon system
8 and they came out with two bugs, and that was after
9 a year of speaking to subpostmasters, access to Fujitsu
10 and access to Post Office. I don't see that I would
11 have done very much better than they would have done.

12 **Q.** Going back, please, to the first page of the advice at
13 paragraph 2., who was it who told you that when the
14 system had been challenged in the criminal courts, the
15 system had always been successfully defended?

16 **A.** I don't know. I think it might have been Andy Cash.

17 **Q.** I'm sorry can you say --

18 **A.** It might have been Andy Cash but I don't know.

19 **Q.** This is a point which you list at paragraph 36(x) of
20 your statement to the Inquiry in support of your
21 understanding at the time that the Horizon system was
22 robust. Did anyone tell you about the acquittal of
23 Maureen McKelvey by a jury in 2004, Mrs McKelvey having
24 raised Horizon issues in her case?

25 **A.** If they did, I can't remember it.

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1 these problems were being reported in Crown post
2 offices. How did you know that very few such problems
3 were being reported?

4 **A.** Because, again, I was told that, I think, by
5 Investigators.

6 **Q.** Looking at the next line in your advice at paragraph 2,
7 where did you get the information that Post Office had
8 announced that Second Sight had been appointed to
9 conduct the review?

10 **A.** Andy Cash.

11 **Q.** The last sentence in this paragraph:

12 "Whether this announcement was well considered or
13 not is not an area that I intend to address but the bell
14 cannot be unring and there will be consequences that
15 will have to be dealt with."

16 What was your view on whether the announcement was
17 well considered? It appears from this that you thought
18 it was not; is that fair?

19 **A.** I don't think that the announcement itself was a very
20 good -- I'm not saying that I didn't think that the
21 investigation wasn't a good idea, because obviously if
22 there are people saying that the system is false, those
23 particular doubts have to be chased but the actual
24 announcement of the Second Sight review led to various
25 difficulties, people wanting to adjourn their cases

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1 until they had reported, et cetera.

2 I think, in fact, in the *Wylie* case, there was such
3 an application for the case to be adjourned until after
4 the Second Sight Report, which would have, as things
5 turned out, been over 12 months, hence ...

6 **Q.** Why would that have been a negative thing, people
7 seeking to adjourn, pending the outcome of
8 an investigation into the system they were blaming for
9 their losses?

10 **A.** Well, as far as that was concerned, it would have
11 created a log jam. The position of Post Office was very
12 strong: this system was robust.

13 **Q.** Was your reaction to the fact of Second Sight having
14 been instructed, the same as your reaction to the
15 announcement of it --

16 **A.** No.

17 **Q.** -- as in, did you think that was negative?

18 **A.** No, if it were me, I wouldn't have done it. If I were
19 the people that -- in charge of Post Office, I would
20 have made absolutely certain through Fujitsu that the
21 system was robust. I would have done an internal
22 inquiry and made sure that Fujitsu could guarantee that
23 there were no bugs that could cause what the
24 Subpostmasters for Justice complaining about.

25 **Q.** Going on, please, to the next paragraph in your advice,
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1 accused to prove that no such loss had occurred.

2 Is your concern here evidence of that approach, the
3 reversing of the burden of proof?

4 **A.** I don't think so.

5 **Q.** Does it suggest that you didn't think it would do for
6 the Post Office to have to evidence the reliability of
7 the data provided to the court in support of its
8 prosecutions?

9 **A.** No, I suggested at this time that we needed an expert in
10 order to demonstrate the reliability of the system.

11 **Q.** This last line of paragraph 3, where you highlight that
12 "All of our cases depend on the system to compute the
13 alleged losses", was this not a reason for you, as
14 a barrister advising on Post Office prosecutions, to be
15 concerned about the potential implications for those who
16 had and were being prosecuted by the Post Office?

17 **A.** Well, of course, it's a concern that the system is
18 challenged but there were, at that time, no successful
19 challenges to it. Now, at that time, I hadn't seen and
20 I hadn't reviewed other cases, but, later on, obviously,
21 I did get to review cases where there were experts who
22 gave -- or who provided statements for the defence and,
23 you know, we did not actually have any positive evidence
24 of the system not being robust until the Second Sight
25 presented their Interim Review 12 months later, and that
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1 that is paragraph 3, you say here:

2 "The first consequence is that we have now given
3 ammunition to those attempting to discredit the Horizon
4 system. The argument will be that there is no smoke
5 without fire and we would not have needed to audit
6 a bomb proof system. We can expect this to go viral in
7 that any competent defence solicitor advising in a case
8 such as this will raise the integrity of the Horizon
9 system and put us to proof as to its integrity. As all
10 of our cases depend on the system to compute the alleged
11 losses this is likely to affect a considerable
12 percentage of our cases."

13 You say in your statement to the Inquiry that you
14 have read the judgment of the Court of Appeal in
15 *Hamilton v Others*; is that right?

16 **A.** I have.

17 **Q.** At paragraph 137 of that judgment, and I don't intend to
18 take you to it, I hope you'll take it from me --

19 **A.** I'll take your word.

20 **Q.** -- there is a criticism that, by representing Horizon as
21 reliable and refusing to countenance any suggestion to
22 the contrary, the Post Office was effectively seeking to
23 reverse the burden of proof, treating what was not more
24 than a shortfall shown by an unreliable system as an
25 incontrovertible loss, proceeding as if it were for the
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1 said that they found nothing systemic with the system.

2 So even then, when we stopped the prosecutions, it
3 wasn't because we thought that the Horizon system was
4 not robust; it's because we thought we had problems with
5 our expert.

6 **Q.** At this point in time, all you knew was that Second
7 Sight had been instructed --

8 **A.** Precisely.

9 **Q.** -- without any information about the basis for that
10 instruction --

11 **A.** Precisely.

12 **Q.** -- and you didn't know what the outcome of the
13 investigation was going to be, did you?

14 **A.** No, of course not.

15 **Q.** So did you think, well, if the outcome of this
16 investigation is that there's a problem with the system,
17 a considerable percentage of prosecutions might have
18 proceeded and might continue to proceed on the basis of
19 unreliable evidence?

20 **A.** Well, that didn't concern me at the time because we were
21 going to -- my advice was we were going to get an expert
22 who was going to attest as to the reliability of the
23 system.

24 **Q.** You go on at paragraph 4 to say this:

25 "The extra evidence which we will be obliged to
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1 gather will be as nothing in comparison to the potential
2 disclosure problems that we may face. Until the Second
3 Sight investigation is concluded we will be in a limbo."

4 One reading of this is that you considered the
5 Second Sight investigation to be problematic because it
6 might give rise to potential issues in relation to
7 disclosable material. Is that the case?

8 **A.** Well, yeah, to an extent, yes, because obviously as far
9 as Second Sight was concerned, it might raise stuff that
10 was disclosable. But I don't think that I thought that
11 it was going to produce material that was going to be of
12 any relevance to the defence in the future because we
13 were told in terms that the system was robust and what
14 we needed to do was get an expert in to demonstrate that
15 it was.

16 Now, obviously, if Second Sight came back and they
17 discovered faults, that was going to create problems in
18 the future. But that's not what happened.

19 **Q.** From the perspective of a prosecutor, is this approach
20 not the wrong way round? In other words, if there was
21 a possibility that an investigation might produce
22 material capable of assisting the defence, or
23 undermining the prosecution, then that was a reason to
24 investigate, not a problem.

25 **A.** I can see what you're saying. But, as far as I was
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1 sees is that the postmaster in interview under caution
2 has blamed Horizon, would the fact of the investigation
3 then have become disclosable?

4 **A.** I'm sorry, sir, I don't think I understand the question.

5 **SIR WYN WILLIAMS:** Let me try again. We've got a case which
6 comes to light shortly after Second Sight has been
7 instructed --

8 **A.** Indeed.

9 **SIR WYN WILLIAMS:** -- to investigate -- and I'm putting this
10 loosely -- the reliability of Horizon within the terms
11 of reference of the Inquiry, all right?

12 **A.** Yes, certainly.

13 **SIR WYN WILLIAMS:** We then have a case in which there is
14 an apparent shortfall, as demonstrated by data from
15 Horizon, and when the subpostmaster is confronted with
16 that, in interview under caution, says, "Well, I can't
17 explain it. It can only be due, however, to some fault
18 in Horizon". Now, either, as part of primary
19 disclosure, but probably more specifically as part of
20 secondary disclosure, would not the fact of the Second
21 Sight review become disclosable?

22 **A.** I'm not entirely sure it would.

23 **SIR WYN WILLIAMS:** All right. I want your view about this,
24 if I may.

25 **A.** Because the whole point of the Second Sight Report being
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1 concerned, if we got an expert who was actually able to
2 attest to the robustness of the system, and the
3 expectation was that Second Sight wasn't going to find
4 anything.

5 **Q.** You go on in paragraph 4 to say this:

6 "It is essential that this enquiry is completed as
7 soon as possible and that we can live by its findings.
8 We will have to find out when this enquiry will report
9 in order that we can choose our strategy. If it is
10 a matter of weeks then cases can be put over until after
11 it reports. If we are talking months then the courts
12 will not wear such delays."

13 Might it not have been the case that a judge
14 presented with a well-made application supported by
15 evidence would have seen it as important to adjourn or
16 stay proceedings pending the outcome of the
17 investigation?

18 **A.** Well, that's certainly one point of view. It was
19 plainly not my view at the time.

20 **SIR WYN WILLIAMS:** Mr Bowyer, can I ask you, you're
21 impliedly, if not expressly, critical of the Post Office
22 decision to announce the Second Sight review but, in
23 case X, shall we say, which comes to light, shall we
24 say, two weeks after Second Sight has been instructed
25 and one of the first things that the prosecuting team
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1 commissioned doesn't actually support a defence that
2 Horizon doesn't work because, if the Second Sight Report
3 comes back and it says the system is robust, that
4 doesn't support the defence. The fact that someone's
5 investigating it is a worry, in that it does back up, as
6 I say in the advice, there's a no smoke without fire
7 argument. But there is no support for a defence by the
8 fact that someone is investigating.

9 **SIR WYN WILLIAMS:** Remind me, is the test for disclosure
10 that it does undermine the prosecution or support the
11 defence, or that it may?

12 **A.** I think it's "may".

13 **SIR WYN WILLIAMS:** Right. So, on any view, surely, if it's
14 "may", then it would be a disclosable document? Oh,
15 sorry, not disclosable --

16 **A.** Disclosable fact --

17 **SIR WYN WILLIAMS:** Yes.

18 **A.** But the fact the Post Office have made the announcement
19 meant it was in the public domain anyway.

20 **SIR WYN WILLIAMS:** But that's what was intriguing me, that
21 you appeared to be critical of an announcement which was
22 in effect inevitable since, once there was a case, it
23 would have to be disclosed.

24 **A.** You may be right.

25 **SIR WYN WILLIAMS:** Thank you.
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1 **MS PRICE:** You were in this advice advising on what the Post
 2 Office should do in relation to prosecutions going
 3 forward, relevant prosecutions. Would you accept that
 4 the question which mattered at this point was whether it
 5 was possible or fair to continue to prosecute whilst the
 6 Second Sight investigation was ongoing?
 7 **A.** Well, at the time, I thought it was.
 8 **Q.** I'm sorry, can you clarify your answer on that? You
 9 thought it was what?
 10 **A.** I thought it was fair to prosecute if we got
 11 an expert demonstrating that the system was robust.
 12 **Q.** There's no express consideration in this advice, is
 13 there, of whether or not it was possible or fair to
 14 continue with prosecutions?
 15 **A.** No, there wasn't.
 16 **Q.** Was there any assessment of that question in your mind
 17 at all, or was it a foregone conclusion that
 18 prosecutions could and should continue?
 19 **A.** My view at the time was that they could continue.
 20 **Q.** At paragraph 5 of your advice, you say this:
 21 "I assume that we still contend that the system is
 22 foolproof in which case we should defend it
 23 aggressively. I understand that the manufacturers have
 24 not been helpful up until now."
 25 Had someone told you, before you drafted this
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1 Office bookkeeping being restored for future
 2 prosecutions will be astronomical."
 3 Did you understand, at the time, that, if the system
 4 was compromised then, as a prosecutor, the overriding
 5 concern should be the impact that this might have on the
 6 fairness of past and present prosecutions?
 7 **A.** Yes.
 8 **Q.** Is it fair to say that this advice does not read as
 9 though that was your overriding concern?
 10 **A.** As an exercise in reading the future, it actually looks
 11 fairly good. Yeah, if the system was compromised, the
 12 consequences would be catastrophic, and that's what's
 13 happened.
 14 **Q.** Well, the last sentence here you say:
 15 "They should be made to understand that this is
 16 a firefighting situation and it is not just our house
 17 that would be burned down if the system were
 18 compromised."
 19 Was it your view that Post Office prosecutions were
 20 facing an existential threat?
 21 **A.** If the system turned out to be compromised, then yes, it
 22 would have been disastrous for them. In fact it has
 23 proved to be disastrous. That's why we're here today.
 24 **Q.** Did "our house" include Cartwright King?
 25 **A.** No, it was Post Office. As far as Cartwright King was
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1 advice, that the system was foolproof?
 2 **A.** That was the impression that I got, yes.
 3 **Q.** Those are quite strong words, "foolproof". Had someone
 4 else used those words in describing this to you?
 5 **A.** I can't recall where I got it from.
 6 **Q.** "Foolproof" is very absolute and you're making
 7 an assumption here that that was the Post Office's
 8 position. Given the Post Office decision to instruct
 9 Second Sight to carry out an investigation into the
 10 system, was it a safe assumption to make about such
 11 an unequivocal position like this?
 12 **A.** Well, with hindsight, no, it wasn't. But, at the time,
 13 it's -- I thought it was.
 14 **Q.** You comment in this paragraph in relation to your
 15 understanding about the manufacturers not having been
 16 helpful up until now, and would not provide expert
 17 evidence without large fees being sought. Where did
 18 that understanding come from?
 19 **A.** I think that came from Andy Cash.
 20 **Q.** You go on:
 21 "This will not do. If the integrity of the system
 22 is compromised then the consequences will be
 23 catastrophic for all of us including them. The
 24 financial consequences of convictions and confiscation
 25 orders being overturned and confidence in the Post
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1 concerned, we were acting on instructions.
 2 **Q.** You set out a number of steps which should be taken at
 3 paragraph 6 of your advice, and we'll come to those in
 4 a moment. What we do not see here is an identification
 5 of the need for a reasoned and rational basis for
 6 continuing to prosecute cases using Horizon evidence
 7 when an investigation into the system was ongoing; is
 8 that fair?
 9 **A.** That is fair.
 10 **Q.** Would you accept, looking at it now, that that is what
 11 was called for in these circumstances?
 12 **A.** Certainly, with hindsight.
 13 **Q.** Was that something you should have recognised at the
 14 time?
 15 **A.** Yes, I -- as far as that was concerned, if I had my life
 16 all over again, I think the advice would be slightly
 17 different.
 18 **SIR WYN WILLIAMS:** Ms Price, we need to take a break, so
 19 just choose a moment shortly, all right?
 20 **MS PRICE:** Yes, sir.
 21 That is an appropriate moment for the break, sir, if
 22 that's convenient. If we can have 15 minutes, and
 23 I make it just past 3.10, so 3.25?
 24 **SIR WYN WILLIAMS:** Yes, certainly.
 25 **MS PRICE:** Thank you, sir.
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1 (3.11 pm)

2 (A short break)

3 (3.25 pm)

4 MS PRICE: Hello, sir, can you still see and hear us okay?

5 SIR WYN WILLIAMS: Yes, I can.

6 MS PRICE: Mr Bowyer, turning, please, to what you did
7 advise in terms of approach and paragraph 6(i), so if we
8 could have that document back up on screen, please.
9 It's POL00180894. There we are. 6(i), if we can go to
10 page 3, please. Starting -- there we are. You say:

11 "In my view we should attend to the following:

12 "We should identify the contested cases, civil and
13 criminal, in which the Horizon system has been
14 challenged. We should identify the areas of challenge
15 and how we neutralised them. Any expert reports should
16 be retained for evaluation. An expert should be
17 identified and instructed to prepare a generic statement
18 which confirms the integrity of the system and why the
19 attacks so far have been unfounded. This expert should
20 be deployed in all cases where the Horizon system is
21 challenged and he should be prepared to be called to
22 reply to defence experts on a case-by-case basis."

23 To what extent was your advice here, to obtain
24 a generic statement, influenced by your understanding in
25 relation to how helpful the manufacturers had been in

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1 reached. First of all, would you accept that what was
2 in fact needed was case-specific expert evidence, rather
3 than a generic statement, even where the expert was
4 prepared to be called to reply to defence experts on
5 a case-by-case basis?

6 A. Well, the expert report should always be relevant to the
7 case in point but certain parts of it, rather like
8 a drug statement, will remain the same. So, if you are
9 giving -- having an expert who is actually commenting on
10 why the system is robust, what the attacks were made on
11 it in the past were and why they didn't actually have
12 consequence, then that could be deployed in each case
13 with reference to what happened in this particular case
14 because we had all sorts of different cases alleged.
15 There were people who were alleged to be taking it out
16 of the till, there were people who were alleged to be
17 putting in PIN numbers; there were people who were
18 alleged to be crossfiring Postal Orders and so each case
19 would be different, and the allegation as to why Horizon
20 was not working would be different in each case, and
21 that, as far as I saw it, was the way it would work.

22 So the guts of the thing would be there, why it's
23 robust, the attacks on the past but he would refer to
24 the case itself, otherwise it would be fairly useless in
25 court.

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1 the past when it came to providing expert evidence, if
2 at all?

3 A. I don't think it was influenced by that at all. The
4 idea was that an expert should prepare a statement where
5 the guts of it would be what has actually occurred in
6 the past and what challenges have been made and that
7 they could comment on the particulars of the particular
8 case that he was being served in.

9 Q. Having had the opportunity to refresh your memory by
10 reference to some of the correspondence which followed
11 this advice, is it right that your advice led to the
12 production of a generic statement in Gareth Jenkins'
13 name?

14 A. It did. I wasn't happy with Gareth Jenkins because
15 I didn't think he was independent but I was --

16 Q. We'll come on to that shortly. I think you've seen
17 a transcript of the evidence given by Duncan Atkinson,
18 King's Counsel, on 18 December last year --

19 A. I have.

20 Q. -- is that right? He was asked a number of questions
21 about your advice on expert evidence in the *Wylie* case
22 and more broadly. I don't intend to take you to the
23 transcript but, if, at any point, you'd like me to,
24 please do say and we'll look to it but I'd like to just
25 run through some of the conclusions Duncan Atkinson

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1 Q. Looking at the way that you have worded paragraph 6(i),
2 which we have just been through, would you accept that
3 this advice was seeking to protect the system rather
4 than to assess the reliability of fundamental evidence
5 in the prosecution of subpostmasters?

6 A. No. I don't accept that. The advice was to say that
7 the system was robust and respond to it. There's no
8 protecting involved. If the system has got faults, they
9 should be disclosed. The whole point was to actually
10 put forward the attacks that had been made on it and
11 this would be an expert who could actually say the
12 system was robust and it was also a windmill for the
13 defence experts to tilt at if they were able to actually
14 come up and the previous attacks on it would be helpful
15 to the defence in that respect.

16 Q. Was the purpose of advising that a generic statement for
17 use in all Horizon cases should be obtained to obviate
18 the need to investigate, as a reasonable line of
19 inquiry, whether problems with the Horizon system might
20 have created a loss, an illusory loss, in the branch of
21 a specific suspect?

22 A. Well, no because such a statement wouldn't, in fact,
23 work in that way. If you were prosecuting a case, you
24 would need to know. If I was prosecution counsel in
25 an individual case, I would need to know why the defence

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1 suggestions weren't actually right and, so, therefore,
2 they would need to be investigated by the expert on
3 a case-by-case basis. I wasn't suggesting having a case
4 to serve blanket in each case, because trial counsel
5 wouldn't have wanted that. They'd have said, "Well,
6 that's all very well in the past but, in this particular
7 case, they're alleging that this has happened, what
8 about it?"

9 **Q.** Was the purpose of advising that this statement be
10 obtained to obviate the need to identify material
11 capable of undermining the truth case or, if it was in
12 the Post Office's possession, might undermine the
13 prosecution case, in any specific case?

14 **A.** No. The point of it was to actually address the system
15 as to why it was safe and, as far as the defence were
16 concerned, give their expert something to actually get
17 into and give them an expert that they could deal with.

18 **Q.** Looking, please, to paragraph 7 at the bottom of this
19 page, you conclude:

20 "I can appreciate that the above might be expensive
21 but it will be as nothing should the integrity of the
22 Horizon system be compromised."

23 Taking a step back and looking at your advice as
24 a whole, do you accept that there was too much focus in
25 this on the potential fallout for the Post Office,
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1 response must be dependent on timescales for completion
2 of the inspection. We are only just beginning to see
3 these issues raised by defence solicitors and the sooner
4 we grasp the problem the better. If you want any more
5 do call, otherwise I will await the outcome of your
6 consultations before responding to the defence."

7 Then, going further up, please. We can see the
8 email above that in the chain, the email from Jarnail
9 Singh to Andy Cash, copied to Susan Crichton and
10 Mr Flemington, dated 16 July 2012. Mr Singh says this:

11 "Andy.

12 "Thank you.

13 "I agree defence will approach to stay the
14 prosecution until the review by Second Sight is
15 completed will become increasingly common. Post Office
16 view is that such an approach be resisted. Review to be
17 conducted is limited in scope in few and isolated cases.
18 Second Sight would work with a number of MPs (two at
19 present) to review cases that have been raised by their
20 constituents. Second Sight's appointment is presently
21 being agreed with the MPs and Justice for
22 Subpostmasters. There is no legal or forensic grounds
23 to argue defendants will not get fair trial or abuse of
24 process. There is no reason to justify the case being
25 stayed. The fact that the review is being carried out
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1 Fujitsu and Cartwright King, if the integrity of the
2 system was found to be compromised, and insufficient
3 consideration of the implications for the people who had
4 been and continue to be prosecuted on the basis of
5 Horizon data?

6 **A.** No. What I was intending to do was actually create
7 a situation whereby these cases could be prosecuted
8 fairly, with proper disclosure to the defence. Our
9 instructions at the time was that this system was robust
10 and, as far as that was concerned, it would have been
11 a pity if we didn't actually defend the system properly
12 because, if a breach in the robustness of Horizon seemed
13 to have been created, as far as that was concerned, that
14 would have been disastrous and so what we wanted to do
15 was demonstrate that it was robust, and there was no
16 covering this up. You know, as far as disclosure is
17 concerned, we have always advised disclosure.

18 **Q.** Could we have on screen, please, POL00143377. Starting,
19 please, towards the bottom of this page. Little further
20 down, please.

21 This is the email from Andy Cash sending your advice
22 to Jarnail Singh on 11 July 2012. He says he encloses
23 advice from Harry Bowyer:

24 "I know it will be unpalatable, but for what it may
25 be worth I share his view. In the instant case, our
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1 is not an acknowledgement that there is an issue with
2 Horizon. The system working properly and is being used
3 up and down the country. When the system has been
4 challenged in criminal courts has been successfully
5 defended. There is no mileage in this position but is
6 in fact superficial."

7 This was a clear view being expressed by Mr Singh
8 that the Post Office would not agree to stay relevant
9 prosecutions; would you agree?

10 **A.** Yes.

11 **Q.** Going up to the top of the page we can see you were
12 copied in to Mr Cash's response, and Mr Cash says:

13 "Thanks for this. Do we take it that we 'resist'
14 defence requests in the terms of your email? I would
15 like formal confirmation bearing in mind the view taken
16 by counsel. If further consultation with Harry or
17 otherwise would assist please let me know. I will need
18 to reply to Kim Wylie's solicitors this week."

19 Did you understand these to be your instructions:
20 that you should resist requests for a stay from the
21 defence.

22 **A.** Well, as I say, I wasn't instructed in any of these
23 cases.

24 **Q.** Did you understand that to be Cartwright King's
25 instructions from this email?
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1 A. It seems fairly clear, yes.
 2 Q. In respect of Mr Singh's comments on your advice more
 3 generally, you say in your statement at paragraph 50
 4 that you thought Mr Singh was somewhat over-optimistic
 5 as to the limited affect of commissioning the Second
 6 Sight review. Can you explain, please, why you say
 7 that?
 8 A. Well, he thought that the Second Sight review was going
 9 to be limited. I didn't.
 10 Q. Did you consider at the time that Mr Singh was
 11 minimising the significance of Second Sight's
 12 instruction?
 13 A. I don't think I gave it that amount of thought but,
 14 actually, if I had addressed it, yes, I suspect that
 15 would have been my view.
 16 Q. At that time, did you have any reason to think that
 17 Mr Singh was not being fully frank with you about
 18 whether there was an issue with the Horizon system?
 19 A. At that stage, no. I had no reason to believe it.
 20 Q. You say in your statement that you were told by Andy
 21 Cash that the Post Office did not like your advice and
 22 that you were not asked to advise formally on the issue
 23 after that. What were you told about the reason why the
 24 Post Office did not like your advice?
 25 A. Andy Cash -- it's a throwaway comment from Andy Cash
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1 "Hopefully Helen will confirm that the Horizon
 2 system has never been successfully challenged. I have
 3 yet to see any signs of experts briefed on behalf of the
 4 defence.
 5 "When she has completed her exercise she should
 6 prepare a summary of those cases where there is a proper
 7 attack on the system rather than a gripe that the system
 8 is at fault (although she should record these cases so
 9 that we can say that they have been kept under review --
 10 they will become more numerous as the bandwagon picks up
 11 speed).
 12 "The expert will need to address the report to the
 13 followed issues ..."
 14 You set out four points:
 15 "A description of the Horizon system (in layman's
 16 terms so that a jury can understand what it is and what
 17 it does)
 18 "[Second] A declaration that it has yet to be
 19 attacked successfully.
 20 "[Third] A summary of the basic attacks made on the
 21 system concentrating on any expert reports served in
 22 past cases. If there are none then state that no expert
 23 has yet been found by any defence team civil or criminal
 24 to attack the system (at the moment there seems to be
 25 little more than griping by the defendants that the
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1 that they'd seen my advice and didn't like it.
 2 Q. I'd like to turn, please, to the generic Gareth Jenkins
 3 statement, which was produced following the July 2012
 4 advice. Could we have on screen, please, POL00141416.
 5 This top email is from you to Jarnail Singh, copied to
 6 Andy Cash and entitled "Horizon integrity project". So
 7 scrolling down a little. We don't see the sender at the
 8 top but we do see "Harry" at the bottom there.
 9 It is responding to the email below from Jarnail
 10 Singh, dated 6 August 2012. Can we scroll down to that.
 11 Thank you. His email is to you, copied to
 12 Mr Flemington. He says this:
 13 "Harry -- it was good to chat with you. I confirm
 14 that Helen Rose has been given the task to gather the
 15 data. Please find her email and spreadsheet. It would
 16 be useful at this stage if you could look at what
 17 information Helen has provided and advice accordingly in
 18 readiness to instruct an expert as part of providing
 19 an advance pack disclosure."
 20 Below that is an email from Helen Rose explaining
 21 where her work pulling together information relating to
 22 cases in which Horizon issues had been raised. Going
 23 back up, please, to the top of the first page, to your
 24 email, and you say:
 25 "This appears to be what we want.
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1 system must be at fault without saying how)."
 2 Further:
 3 "Plainly, like all accounting systems, there is room
 4 for human error (keying in the wrong amounts etc) but
 5 the expert should be able to state that innocent human
 6 error is unlikely to produce the types of discrepancies
 7 of many thousands of pounds over many months.
 8 "A decent report along these lines will go a long
 9 way to putting this issue to bed."
 10 Can you help with why you considered the factual
 11 position on whether there had been an effective legal
 12 challenge to the Horizon system was a matter for expert
 13 IT opinion?
 14 A. Well, I don't think I meant legal decision. I meant had
 15 there been an attack made by an expert on the system?
 16 Had there been any faults found? Had there been any
 17 faults suggested?
 18 Q. Helen Rose was putting together a spreadsheet of cases
 19 based upon Post Office records, wasn't she?
 20 A. Yes.
 21 Q. Can you help with why someone from the Post Office was
 22 not identified to give evidence about these previous
 23 cases or produce records of them?
 24 A. Well, I assumed that the database that was put together
 25 would be something that would appear on the disclosure
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1 schedule and would be useful for a defence expert to
 2 look at.

3 **Q.** Looking at the four issues you advised that the generic
 4 priorities should address, did you consider that these
 5 issues were sufficient to form the basis of a generic
 6 report on Horizon integrity?

7 **A.** Well, I'm not a computer expert so, at this particular
 8 stage, I hadn't heard of any bugs in Horizon and so what
 9 I wanted to do was actually take everything that there
 10 was that was critical of Horizon, because there was
 11 nothing from the Post Office side and so the best angle
 12 I thought was the attacks that had been made in previous
 13 cases, because they would actually give the best in if
 14 there were any faults to be found with it.

15 **Q.** These four issues do not actually address the
 16 fundamental question of whether a problem with the
 17 system could cause illusory shortfalls in branch, do
 18 they?

19 **A.** No, they don't.

20 **Q.** Quite apart from the issue of whether a generic, as
 21 opposed to case-specific, approach was what was
 22 required, wasn't that the question at the heart of
 23 things?

24 **A.** You may well be right. Obviously, I'm not a computer
 25 expert and so I went about it the way that I thought the

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1 with defence boundless enquiry into the whole Horizon
 2 system. Perhaps we need to reconsider whether to
 3 instruct him as he may be viewed too close to the system
 4 but instruct somebody entirely independent? Your
 5 thoughts please and also whether you or Harry have
 6 anybody in mind."

7 Then you reply to this in the top email on the page,
 8 saying:

9 "I would have preferred someone entirely independent
 10 but this is such a specialist area that we would be hard
 11 pushed to get a report in the timescale that we
 12 require -- we might open our expert up to allegations of
 13 partiality but his expertise will be unlikely to be
 14 challenged.

15 "We need to get this report off the skids as soon as
 16 possible as we have PCMHs and trials galloping up on
 17 us."

18 Was the urgency of the expert report being driven by
 19 the court timetabling in the case of *Wylie* and the other
 20 cases due to become --

21 **A.** It was a factor, certainly.

22 **Q.** In this email, you express a preference for someone
 23 entirely independent and you explain at paragraph 55 of
 24 your statement that this was because the potential for
 25 allegations of bias or actual conflicts of interest, as,

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1 system, you know, could be best explained and best
 2 presented for the defence. Again, if I was able to
 3 write the advice from this email all over again, I may
 4 well have approached it differently. But, at the time,
 5 I didn't know.

6 **Q.** Towards the --

7 **A.** You can see it from the Jarnail Singh email, where he
 8 says it's robust. That's the information we got
 9 constantly at this time: that the system was fine apart
 10 from human error and manual entry mistakes.

11 **Q.** Could we have on screen, please, POL00020489. Towards
 12 the bottom of the first page, please, is an email from
 13 Andy Cash to Jarnail Singh, copied to you, among others,
 14 and dated 12 September 2012, and he says this:

15 "Harry advises that the report, provided it is
 16 comprehensive, is what is needed and we now need the
 17 experts report on it as soon as practicable in view of
 18 the current cases timetables."

19 The email replying to this is above and from Jarnail
 20 Singh. He says:

21 "Andy
 22 "Thinking about a choice of expert in this case.
 23 I have in the past instructed Gareth Jenkins of Fujitsu
 24 in the case of *Misra* which [identical] was the only
 25 challenge on Horizon, he provided expertise in dealing

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1 in the event, were plainly relevant, were obvious.

2 Can we take it from this that you were alive to the
 3 fact that Mr Jenkins was not a functionally independent
 4 witness?

5 **A.** Yes.

6 **Q.** Was consideration given at this stage to applying to
 7 adjourn these cases to enable time to find
 8 an appropriate expert, other than Mr Jenkins?

9 **A.** I don't think so, no.

10 **Q.** Do you think consideration should have been given to
 11 that?

12 **A.** With hindsight, certainly.

13 **Q.** You say at paragraph 56 of your statement to the Inquiry
 14 that you were made firmly aware that finding another
 15 expert was impracticable. Who was it who made you
 16 firmly aware of this?

17 **A.** I was made aware by Post Office, and it was such proved
 18 to be the case, when we actually tried to find another
 19 expert after Mr Jenkins developed his problems and so
 20 actually trying to find experts, I think Martin Smith
 21 and Simon Clarke approached quite a number of people to
 22 try to get a report done on this case and Post Office
 23 weren't helpful during that time, and actually finding
 24 someone with the expertise to be able to give a report
 25 on the Horizon system was very difficult indeed. But we

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1 certainly were not going to be able to do it in any
 2 short period of time because, obviously, you know, they
 3 had to be told what was wanted. They had to give their
 4 estimate as to what it was going to cost in order to
 5 provide such a report, et cetera.

6 **Q.** Would you agree that Mr Jenkins' lack of functional
 7 independence made it all the more important to ensure
 8 that he was aware of and understood the nature of expert
 9 duties?

10 **A.** Yes.

11 **Q.** Could we have on screen, please, POL00096997. Towards
 12 the bottom of this page is the start of an email from
 13 you to Martin Smith, dated 2 October 2012 and entitled,
 14 as the chain of emails is, "Horizon Fujitsu report very
 15 urgent". You are responding to an email from Martin
 16 Smith which was forwarding on to you a report prepared
 17 by Mr Jenkins in draft. Going to page 4 of this
 18 document, please, we can see an email further down in
 19 the chain which was forwarded to you, an email from
 20 Jarnail Singh, there we are, dated 1 October 2012, which
 21 was sent to Gareth Jenkins and copied to Penny Thomas,
 22 Hugh Flemington and Martin Smith.

23 We see there an introductory paragraph and, about
 24 halfway down:
 25 "You will need to consider the Disclosure Officer's
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1 requests for further disclosure (see attachment). Can
 2 you put this past Mr Jenkins."

3 So dealing first, then, with the amendment you made
 4 to the draft, could we have the amended draft on screen.
 5 It's POL00058369. This the draft generic Horizon
 6 integrity report, which had been sent by Mr Jenkins, and
 7 this version shows the amendment that you had made
 8 referred into your email. If we can go to page 9 of the
 9 report, please. This is section 3 entitled "Horizon
 10 Integrity". Casting your eye down the page to see
 11 what's been taken out, we see a large chunk which has
 12 been deleted. Just scrolling further down, please, and
 13 over to the top of the next page, the change that you
 14 had made was to delete the reference to the Helen Rose
 15 spreadsheet and the summary of the specific cases which
 16 Mr Jenkins had taken from that spreadsheet as well as
 17 any reference made by Mr Jenkins to specific cases.
 18 Would you agree with that as a characterisation of the
 19 amendment?

20 **A.** Yes.

21 **Q.** Can you explain why that amendment was made?

22 **A.** Because this is the -- effectively, the basis of any
 23 statement made in a case and, as far as those matters
 24 are concerned, if you go back to the previous page at
 25 the top of it, there is an awful lot there that would
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1 document/spreadsheet (see attachments) [that's the Helen
 2 Rose spreadsheet] and need to address in your report the
 3 following issues ..."

4 We see there -- I won't read them out again -- what
 5 looks like a copy and paste of the four points from your
 6 earlier correspondence. These instructions were
 7 contained in an email chain which was forwarded on to
 8 you when you considered Mr Jenkins' draft. They are, in
 9 effect, the instructions to Mr Jenkins. Did you
 10 consider these instructions sufficient for the
 11 instruction of a prosecution expert at the time?

12 **A.** Well, at the time I plainly did, yes.

13 **Q.** Do you consider them sufficient, looking at them now?

14 **A.** No, I -- if I went back, knowing what I know now, then
 15 obviously I would -- I'd have done different.

16 **Q.** Going back up to your email of 2 October, please, that's
 17 the bottom of page 1, going over to the top of the next
 18 page. So having been sent the draft report, you say:
 19 "At first sight this/these took good, look like
 20 a good base upon which our reports can be based (as most
 21 are fishing expeditions they will do in the current
 22 form)."
 23 You say:
 24 "I have edited the last report (last paragraph)
 25 because as it currently stands it is an invitation for
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1 have to be changed every time. So "HR Spread", this is
 2 a spreadsheet prepared by Helen Rose summarising 25
 3 cases. As we went on, that number would have to change.
 4 It lists the number of cases that he didn't have
 5 anything to do with and, as far as this is concerned, it
 6 lists the cases that he did have something to do with
 7 but there's nothing there that undermines the
 8 prosecution case in this. All of this would be
 9 disclosable but would be stuff for a disclosure
 10 schedule, not for the statement itself.

11 That's why I removed it because all that would
 12 happen is we would be asked for vast quantities of
 13 paperwork in every case relating to these cases.

14 Now, if they, actually -- as I said, none of it is
 15 primary disclosure but later it would be secondary
 16 disclosure and, in due course, they could get that from
 17 the disclosure schedule.

18 **Q.** At the time, did you consider that it was appropriate
 19 for you to amend the expert's draft report?

20 **A.** Yes, I was asked to look at it. It would be absurd if
 21 someone couldn't put papers in front of their lawyers to
 22 say "Is this right?" and the amendments that I made,
 23 I then asked Martin Smith to put in front of Mr Jenkins
 24 to see if he approved. The actual flavour of the thing
 25 is exactly the same. It says what Mr Jenkins says but
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1 it doesn't provide vast quantities of names of other
 2 defendants which, again, whether that's proper to put in
 3 a statement at this stage.
 4 **Q.** Did you ensure that the original unamended draft was
 5 recorded on the unused schedule in the case of Wylie or
 6 any other case in which it was disclosed?
 7 **A.** No, because I wasn't actually litigating that case.
 8 **Q.** Can you help with whether Helen Rose's spreadsheet was
 9 treated as unused material, potentially disclosable in
 10 other cases?
 11 **A.** I never saw the disclosure sheets.
 12 **Q.** Looking, please, to the last page of the draft report
 13 again. There's no expert's declaration on this draft
 14 report, is there?
 15 **A.** Not that I've seen.
 16 **Q.** I think you've had a chance to review the document in
 17 its entirety ahead of today?
 18 **A.** Yes.
 19 **Q.** Would you agree that it does not set out the substance
 20 of Mr Jenkins' instructions?
 21 **A.** Yes.
 22 **Q.** That can come down now. Thank you.
 23 In your email to Martin Smith of 2 October 2012, you
 24 asked that he draft generic section 9 statements for
 25 Mr Jenkins to produce the reports. Why was it that you

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1 expert evidence?
 2 **A.** I don't know. It was a work in progress.
 3 **Q.** At this point or at any other point, did you take any
 4 steps to ensure that Mr Jenkins had been properly
 5 instructed as an expert --
 6 **A.** No.
 7 **Q.** -- and made aware of his duties as an expert?
 8 **A.** No.
 9 **Q.** Can you help with why? Was it that this was someone
 10 else's responsibility, or?
 11 **A.** I wasn't, as I said, litigating in the case and I wasn't
 12 counsel instructed. But a counsel instructed in the
 13 case would, I hope, have spotted if the expert's report
 14 didn't have an expert's declaration on it.
 15 **Q.** Can we have on screen, please, POL00097216. This is
 16 an email chain from November 2012 containing emails from
 17 Rachael Panter, Gareth Jenkins, Andy Cash, Jarnail Singh
 18 and some others. Looking, first, please, at page 3.
 19 This is an email from Mr Jenkins, dated 27 November
 20 2012. In the third paragraph -- this is to Rachael
 21 Panter, you are not in the copy list of this at this
 22 stage -- Mr Jenkins says:
 23 "Reading through the defence statement I see it does
 24 make some specific points which my statement doesn't
 25 currently address, specifically the challenges regarding

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1 considered that was the format that these should be put
 2 into, rather than a form of an expert report?
 3 **A.** I don't know. It's what I decided at the time.
 4 **Q.** Did you at the time advise Mr Singh or anyone else at
 5 Cartwright King that the report or statement needed to
 6 set out the requirements for expert evidence in criminal
 7 proceedings, as required under the common law and the
 8 Criminal Procedure Rules?
 9 **A.** I don't know. I hope I would have done but I don't
 10 know.
 11 **Q.** It may follow, were you aware at the time of the need
 12 for an expert to include a statement to the effect that
 13 the expert has complied with his or her duty to the
 14 court to provide independent assistance by way of
 15 objective, unbiased opinion in relation to matters
 16 within his or her expertise and an acknowledgement that
 17 the expert will inform all parties and, where
 18 appropriate, the court, in the event that his or her
 19 opinion changes on any material issues?
 20 **A.** I'm sorry, I don't understand the question.
 21 **Q.** I'm asking if you were aware that the wording I've just
 22 read out was a mandatory requirement for inclusion?
 23 **A.** Yes. Yes, I was.
 24 **Q.** Can you help with why you didn't flag up, certainly on
 25 the email that we've just seen, the requirements for

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1 robustness and remote access to the system. Do you want
 2 me to try to address those specifics?"
 3 Scrolling up, please, to Ms Panter's reply on the
 4 same day. She says this in her first paragraph:
 5 "Many thanks for this ... If you feel that you are
 6 able to deal with the issues of robustness and the
 7 Remote Access system fairly swiftly then I would like
 8 you to address those points that have been raised, so
 9 that we can deal with every area that they have
 10 criticised."
 11 Scrolling up again, please. We see an email from
 12 Mr Jenkins, and he proposes adding in to the report some
 13 new sections. And he says:
 14 "I have been asked to provide a statement in the
 15 case of Kim Wylie. I understand the integrity of the
 16 system has been questioned and this report provides some
 17 general information regarding the integrity of Horizon."
 18 There is then reference to the robustness of Horizon
 19 in the next paragraph, including:
 20 "... I would say that Horizon has been designed such
 21 that it does not break down easily and is not affected
 22 by a single application failure. Also, Horizon does
 23 recovery quickly from failures and does hold up well
 24 under exceptional circumstances and is not wholly
 25 affected by a bug in one aspect of it. However as the

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1 report below shows, that in those cases where there is
2 a failure, the integrity of the data recorded is
3 maintained and any discrepancies resulting from the
4 failure are restricted to the transactions being
5 processed at the time of failure, whose amounts are
6 normally insignificant compared to the amounts
7 identified in shortfalls of cash as found during
8 an audit of a branch."

9 He goes on to address remote access.

10 "I also note a comment made about it being possible
11 to remotely access the system. It is true that such
12 access is possible; however in an analysis of data
13 audited by the system, it is possible to identify any
14 data that has not been input directly by staff in the
15 branch. Any such change to data is very rare and would
16 be authorised by Post Office Limited. As I have not had
17 an opportunity to examine data related to this branch,
18 I cannot categorically say that this has not happened in
19 this case, but I would suggest it is highly unlikely."

20 Coming then to the email at the top, which is
21 Ms Panter's reply. She says:

22 "I have had our in-house counsel Harry Bowyer read
23 this and he is happy for all of it to go in, including
24 the section about remote access. Harry has suggested
25 that in order for us to deal with that potential avenue,

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1 about the whole thing.

2 **Q.** Having had the opportunity to refresh your memory by
3 reference to this document, do you now recall being made
4 aware, in November 2012, about remote access?

5 **A.** No, not remotely. When -- there were a couple of shock
6 moments in this, as far as we were concerned. Number 1
7 was Second Sight discovering that there were bugs, and
8 the second one was the Deloitte report, which said that
9 there was remote access because by that stage Post
10 Office had been quite voluble about the fact that there
11 wasn't, and this particular email exchange, I just don't
12 remember because, as I said, my memory was the shock of
13 the Deloitte report.

14 **Q.** Does it follow from your answers that you don't recall
15 feeling shock when you found out about remote access
16 from Gareth Jenkins in November 2012?

17 **A.** Well, I don't think it was such an issue at that
18 particular stage, because when we got into 2013, people
19 were denying that it was possible and, you know, it was
20 when the Deloitte report came out that that was proof
21 positive that it was possible. And, as I said, my
22 reaction was shock in 2013 and I just didn't remember
23 this exchange. I'm pleased to say that -- pleased to
24 see that I actually advised disclosure of that and
25 I suggested that it should be followed up in the

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1 that we ask the investigator to check if there have been
2 any occasions where the system has been accessed
3 remotely. Their findings either way can then be added
4 in a further covering their lines of inquiry."

5 So is Ms Panter right that you read and approved the
6 wording proposed by Mr Jenkins that --

7 **A.** She must be, yes.

8 **Q.** You have this morning made a correction to your
9 statement, to the effect that the Deloitte report was
10 not the first time you became aware that remote access
11 was possible.

12 **A.** No.

13 **Q.** Was it looking at this document --

14 **A.** It was looking at this document. This document dates
15 back to November 2012, when the backdoor wasn't an issue
16 that was bothering us. That became more live in July of
17 the next year, some eight months later, and I'd clean
18 forgotten it. You can see with the Gareth
19 Jenkins-Rachael Panter, he emails her first at I think
20 about 12.00 and her response is at 12.21. I have
21 telephoned Rachael Panter so I plainly wasn't close to
22 my keyboard, so I probably read the email on my
23 telephone, responded that I was happy for it to go in,
24 and suggested that we ought to cover whether it had been
25 remotely accessed and then, I'm afraid, I clear forgot

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1 statement.

2 **Q.** Do you think you understood the implications of this in
3 November 2012?

4 **A.** No, I don't think I did. It was plainly disclosable and
5 that's why I advised disclosure. But it was the next
6 year that the backdoor became an issue.

7 **Q.** I'd like to move, please, to the Second Sight Interim
8 Report. Could we have on screen, please, paragraph 60
9 of Mr Bowyer's statement, page 15. You say here:

10 "As far as Cartwright King's concerns with the
11 Second Sight Interim Report were concerned we were very
12 much alive to the fact that a system that we had been
13 told was robust did indeed have bugs in it. This was
14 plainly going to cause [Post Office Limited]
15 difficulties."

16 At 61:

17 "I remember being taken aback when we discovered
18 what the Second Sight Interim Report would contain as it
19 flew in the teeth of what we had been told. Again, it
20 was not of direct concern to me, as I was not a member
21 of the Post Office department."

22 Do you mean the Cartwright King Post Office
23 department by that?

24 **A.** Yes.

25 **Q.** You say at paragraph 14 of your statement that you

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1 became aware, through conversations that Martin Smith
 2 had had with senior Post Office Limited executives that
 3 the Second Sight Interim Report would reveal the
 4 existence of bugs in the Horizon system. How long
 5 before the publication of the Interim Report did these
 6 conversations take place; can you remember?
 7 **A.** It happened at the very end of June, I think. What
 8 happened was Martin Smith reported to Simon Clarke that
 9 the Second Sight Report would disclose bugs. Simon
 10 Clarke actually had a Post Office case that he was
 11 prosecuting as counsel, and so he and Martin had
 12 a conversation with Gareth Jenkins and I think the
 13 Inquiry has got Martin's note of that particular
 14 conversation. As a result of that, Simon asked to see
 15 all Gareth Jenkins' previous statements or a number of
 16 them and discovered that none of this material had been
 17 made available there, which caused a worry about that
 18 particular witness. That's what, effectively, inspired
 19 the clerk report, which I think was about 15 July.
 20 **Q.** When Martin Smith was told that the Interim Report was
 21 going to make reference to bugs in the system, did
 22 anyone from Cartwright King ask anyone from the Post
 23 Office how long they had known about these bugs?
 24 **A.** I don't know.
 25 **Q.** Did you?

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1 involved with."
 2 Then at 64 you address the implications of this.
 3 You say quick:
 4 "The implications of this were plainly enormous and
 5 it was our joint view that [Post Office Limited] could
 6 not continue to prosecute on his evidence and there
 7 would have to be a revisiting of previous cases with
 8 disclosure in mind. This was unlikely to be popular
 9 with [Post Office Limited] and our employers,
 10 [Cartwright King]."
 11 You say, however, that the management at Cartwright
 12 King turned out to be supportive of your position; is
 13 that right?
 14 **A.** Yes. It was a nasty time, because, you know, if they
 15 hadn't have been it could have made our lives very
 16 uncomfortable.
 17 **Q.** Did it surprise you that Cartwright King management were
 18 supportive of your position at the time?
 19 **A.** I was actually quite pleasantly surprised by it.
 20 I thought they were going to be more difficult about it.
 21 **Q.** You say at paragraph 65 there that:
 22 "... the matter was canvassed at the highest levels
 23 with the equity partners as [Post Office Limited] was
 24 an enormous client even for a firm the size of
 25 [Cartwright King]."

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1 **A.** I certainly didn't but I came in later because I wasn't
 2 part of the telephone call to Gareth Jenkins, so that
 3 was Martin and Simon.
 4 **Q.** Did this make you question, when you got this message,
 5 whether Cartwright King would have been told about the
 6 existence of these bugs by the Post Office, were it not
 7 for the impending report?
 8 **A.** Yes, I mean, this is -- this, as I said, was one of the
 9 shock moments because a system that we were told was
 10 robust, whilst it didn't have anything systemic in it,
 11 it did have bugs and we should have known about them and
 12 we should have been disclosing them.
 13 **Q.** At paragraph 62 of your statement, you deal with the
 14 information you received about Gareth Jenkins' knowledge
 15 of bugs, and you say -- this is the point at which you
 16 became involved:
 17 "... when I was approached by Simon Clarke who told
 18 me about the conversation that he and Martin Smith had
 19 had with Gareth Jenkins in late June about the case that
 20 Simon was prosecuting.
 21 "The thrust of the conversation was that it was
 22 Gareth Jenkins who had provided the information about
 23 the two bugs mentioned in the Second Sight Interim
 24 Report. This was clearly not consistent with statements
 25 that he had given in the criminal cases that he had been

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1 **A.** Yes.
 2 **Q.** So was that part of the reason why you were pleasantly
 3 surprised, because of the significance of this client --
 4 **A.** Yes.
 5 **Q.** -- to the firm?
 6 **A.** Yes. I mean, effectively, that was the stage that we
 7 stopped the Post Office prosecuting and we also were
 8 aware that there were disclosure problems, as far as
 9 previous convictions. It may well be that Cartwright
 10 King are not covered in glory, as far as their role as
 11 independent lawyers are concerned but, actually, we did
 12 stop the prosecutions at that stage and we did begin the
 13 disclosure sifts.
 14 **Q.** You deal at paragraph 66 with the Post Office reaction
 15 to the Interim Second Sight Report and you say that:
 16 "[Post Office Limited] were philosophical in regard
 17 to disclosure of the Second Sight Interim Report to
 18 current and previous defendants."
 19 What do you mean when you say Post Office was
 20 philosophical in regard to disclosure of it?
 21 **A.** Well, we made it clear that these -- as far as the
 22 Second Sight Interim Report and later the Helen Rose
 23 report disclosed stuff that should have been made
 24 available to previous defendants who had either been
 25 convicted or who had pleaded, and so Simon Clarke put in

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1 the sift regime and Post Office, very shortly after
 2 that, instructed Brian Altman QC, as he was then.
 3 **Q.** Can you recall which individuals at the Post Office in
 4 particular were philosophical in this respect?
 5 **A.** I think Jarnail Singh was someone I remember discussing
 6 the case with Simon and Martin.
 7 **Q.** You go on to say:
 8 "The attitude then was still that the system was
 9 essentially robust and, once the new expert was
 10 instructed, they could prosecute again. They were very
 11 concerned at the new cases being investigated piling
 12 up."
 13 **A.** Yes.
 14 **Q.** What was the reasoning given by the Post Office for
 15 continuing to believe the system to be robust,
 16 notwithstanding the bugs which were identified in the
 17 interim Second Sight Report?
 18 **A.** Well, the bugs themselves were identified by Second
 19 Sight as not being systemic and so, at that particular
 20 stage, the belief was that an expert who was reliable,
 21 or who was independent of Fujitsu, who could give the
 22 Horizon system a clean bill of health, would, in fact,
 23 fix the situation and they would be able to continue to
 24 prosecute.
 25 **Q.** Did no one think, well, if there have been these two
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1 disclosed was the Second Sight Interim Report and the
 2 Helen Rose Report when it must have been known at [Post
 3 Office Limited] and Fujitsu that the problems with
 4 Horizon ran much deeper. We were under the impression
 5 that whilst there were a couple of minor bugs revealed
 6 by Second Sight and we had a problem with a dishonest
 7 witness the Horizon system was fundamentally sound and
 8 once that had been demonstrated by an independent expert
 9 witness that prosecutions would proceed again. If we
 10 knew then what we know now then there should have been
 11 a root and branch reappraisal of the past prosecutions
 12 and a complete moratorium on prosecutions based on
 13 Horizon until it could be demonstrated to be sound."
 14 At around the time of the publication of the Second
 15 Sight Interim Report, you had been told that Mr Jenkins
 16 was the one who had told Second Sight about the two bugs
 17 identified in the report?
 18 **A.** That was my impression, yes.
 19 **Q.** You were concerned, along with your colleagues, enough
 20 about his non-disclosure of bugs in the past that you
 21 considered the Post Office could not continue to
 22 prosecute based on his evidence. So in those
 23 circumstances, did you not question, at the time,
 24 whether there might be problems running deeper with
 25 Horizon about which he and others were not being
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1 bugs, there might be others?
 2 **A.** Well, to an extent, the Second Sight had been at this
 3 for over a year, and they had been, as far as we knew,
 4 in contact with Fujitsu, with the postmasters. They
 5 were forensic accountants and this is all they'd come up
 6 with.
 7 **Q.** Did anyone think there have been these bugs, there might
 8 have been others in the past outside the period being
 9 looked at by Second Sight?
 10 **A.** I don't know if anyone thought that but, as far as I was
 11 concerned, I thought that Second Sight had actually
 12 spent a fair amount of time doing this but that was the
 13 whole point of getting the expert to take a look at the
 14 thing, to see if it was, in fact, you know, robust as
 15 Post Office said.
 16 **Q.** Can you recall who was expressing concern about new
 17 cases being investigated piling up?
 18 **A.** I think that was Jarnail.
 19 **Q.** Could we turn, please, to page 22 of Mr Bowyer's
 20 statement, at paragraph 107, towards the bottom, please.
 21 In the context of a question about how the Cartwright
 22 King review, to which we'll come, should have been done
 23 differently, you say this:
 24 "Plainly the review was conducted on the false
 25 premise that the only material that needed to be
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1 forthcoming?
 2 **A.** Well, at the time, no.
 3 **Q.** Who was it at the Post Office that made the decision to
 4 cease prosecutions until another expert can be found, as
 5 far as you were aware?
 6 **A.** I wasn't aware and it was as a result of Simon's advice.
 7 **Q.** Turning then, please, to the Cartwright King review --
 8 **SIR WYN WILLIAMS:** Well, hang on, Ms Price. We're now
 9 getting close-ish to 4.30. What's the plan?
 10 **MS PRICE:** Sir, I think it's unlikely that I will finish
 11 this afternoon. I don't have much more but I won't be
 12 finished by 4.30, I'm afraid, sir. We had envisaged
 13 going into tomorrow, in any event, ahead of Mr Smith's
 14 evidence, to deal with Core Participant questions and,
 15 sir, I wonder if it might be acceptable for me to finish
 16 my questioning in the morning before we commence that?
 17 **SIR WYN WILLIAMS:** Yes. Well, subject to me just confirming
 18 with Mr Bowyer that he's ready, able and willing, so to
 19 speak, to return tomorrow.
 20 I understand that's the case, is it?
 21 **A.** Yes, sir, I indicated a while ago that I could come
 22 tomorrow.
 23 **SIR WYN WILLIAMS:** Fine. So I think it is a convenient time
 24 to stop now. We've been working since 9.45. So,
 25 overnight, please don't talk about your evidence, I'm
 192

1 sure you won't, and we'll resume again at 9.45 tomorrow.
2 Thank you.
3 **THE WITNESS:** I'm obliged.
4 **MS PRICE:** Thank you, sir.
5 **(4.23 pm)**
6 **(The hearing adjourned until 9.45 am the following day)**
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