

Friday, 14 June 2024

1
2 (9.45 am)
3 **ANDREW PAUL PARSONS (continued)**
4 **Questioned by MR BLAKE (continued)**
5 **MR BLAKE:** Good morning, sir, can you see and hear me?
6 **SIR WYN WILLIAMS:** Yes, I can, thank you.
7 **MR BLAKE:** Thank you very much.
8 Mr Parsons, today I'm only going to be about an hour
9 long and I just have a few miscellaneous topics to
10 cover.
11 Before I do that could we please bring up on to
12 screen WITN10390201. Yesterday when we confirmed the
13 truth of your witness statement, there were also some
14 amendments to be made, largely to spellings and
15 reference numbers. Can you confirm that, subject to
16 what we see on screen now, the statement that you
17 confirmed as true is true to the best of your knowledge
18 and belief?
19 **A.** That is correct.
20 **Q.** Thank you very much, that can come down.
21 I'm going to begin today by asking a few more
22 questions about the litigation. We left off yesterday
23 with that strategy document. I want to ask you first
24 about issues with witnesses. Could we please turn to
25 FUJ00182166, please. If we could look at the bottom
1

1 "I had a conversation this morning with Andrew
2 Parsons, the partner at [Womble Bond Dickinson] handling
3 the case, and he made it very clear that it was
4 absolutely essential for the Post Office case that Steve
5 Parker appear as witness to rebut Mr Roll's [witness
6 statement]. [Womble Bond Dickinson] did make clear that
7 Steve would receive witness training and support.
8 "He also said it was extremely urgent that we
9 convince Steve to be a witness and asked if I could
10 respond today on this."
11 Do you recall an issue with this particular witness
12 being concerned about giving evidence.
13 **A.** Yes.
14 **Q.** There's reference there to witness training. Did he
15 receive witness training?
16 **A.** I can't recall if he specifically did but we offered
17 witness training through a third-party company to,
18 I think, all of our witnesses.
19 **Q.** How about support?
20 **A.** I can't recall specifically what support was given to
21 Steve Parker.
22 **Q.** If we look at the email that was attached to that email,
23 can we please look at FUJ00182096. I don't know if you
24 will have seen this at the time but I just want to ask
25 you about the concerns that he expressed in that email:
3

1 email, it's an email of 22 October 2018, from somebody
2 called Chris Jay to David Jones. He says as follows:
3 "The claimants and Post Office are at the stage of
4 exchanging witness statements.
5 "One of the claimants' witnesses is a Richard Rolls
6 [sic]. He used to work for Fujitsu and left in about
7 2004. His witness statement is attached.
8 "We have checked to see if he left under a shadow
9 and have no evidence that he did. He did however appear
10 on the Panorama programme a few years ago about the Post
11 Office and Horizon, which I did not see, but which from
12 Womble Bond Dickinson believe that the claimants and
13 their lawyers Freeths, determined that he may be able to
14 assist with their case.
15 "One of our team, Steve Parker, worked with Mr Rolls
16 [sic] and gave him a positive reference. Steve is now
17 involved assisting Post Office the defence and has
18 commented on Mr Roll's [witness statements] (see
19 attached). He has made clear that he does not wish to
20 give a [witness statement] and appear in court as he saw
21 the effect on another colleague. See attached
22 correspondence with Jonny Gribble [sic] of [Womble Bond
23 Dickinson] on the latter point.
24 "I also attach Gareth Jenkins' commentary on Richard
25 Roll's [witness statement] for information.
2

1 "The minutes of our meeting are being turned into
2 a witness statement. I have seen this process
3 previously where a colleague signed such a statement
4 which resulted in a very stressful court appearance.
5 I am happy to continue supporting the process and
6 refining the information but I will not be signing
7 a witness statement, we need to find another way to use
8 this information.
9 "Steve."
10 Can you recall any discussions on this topic with
11 Mr Parker?
12 **A.** I can't recall any discussions directly with Mr Parker.
13 **Q.** Did you understand anything about that court appearance
14 that he is referring to in that email?
15 **A.** I don't believe I did.
16 **Q.** Could we please turn to FUJ00160244. Just on that, you
17 said you don't believe you did; do you now? Is there
18 anything you know about that now?
19 **A.** No, there's nothing I know now about that.
20 **Q.** This is on the same topic, if we start on page 4,
21 please, about halfway down, thank you. It's an email
22 from Graham Allen to Chris, Chris Jay. He says:
23 "Chris
24 "Steve and I are both early starters so I have had
25 a long conversation with Steve this morning.
4

1 "I am afraid he is adamant that he does not want to
2 voluntarily put himself through the stress he feels this
3 will generate despite wanting to defend the team from
4 that time. He was expecting someone to come back to him
5 and had already given it a great deal of thought. He is
6 aware that he may get subpoenaed and would deal with
7 that if it happened. He didn't think sharing the load
8 with another team member would help.

9 "I tried to persuade but did not want to push too
10 hard; not sure what else we can try. Steve is not the
11 sort of person to take decisions lightly or be easily
12 swayed from his chosen direction."

13 If we scroll over to the first page, we can see that
14 there is a response from you, at the bottom of the page.
15 You say:

16 "There isn't an alternative to witness evidence. We
17 could look at summoning Steve but that would be far
18 from ideal.

19 "We need to urgently (today?) work out whether there
20 is an alternative to Steve. If that hits a dead end
21 then we will need to regroup and think again."

22 If we scroll up to the top there's a response, at
23 the very top of the page, please:

24 "Andy,

25 "Have just heard back from the Account team

5

1 **Q.** Can we please turn to the third page. It sets out
2 various litigation strategy options as they then stood,
3 and I'd like you to look at number 5, "Attrition". It
4 says there:

5 "Stretch out the litigation process so to increase
6 costs in the hope that the Claimants, and more
7 particularly their litigation funder, decide that it is
8 too costly to pursue the litigation and give up."

9 It says:

10 "Recommendation: this option is not recommended as
11 we believe the pressure on, and cost to, Post Office
12 would become unbearable before the claimants gave up."

13 We see that on the right-hand side the reasons for
14 that:

15 "The claimants' litigation funder ... is
16 an experienced funder with deep pockets. It will be
17 prepared for a long piece of litigation. So long as it
18 believes the merits of the case are favourable, it can
19 be expected to fund the litigation.

20 "Over time the litigation will become more
21 disruptive to Post Office's business as more operating
22 practices are put under the spotlight and then have to
23 be overseen by lawyers in order to avoid problems in the
24 litigation process.

25 "Although media reporting on this matter is

7

1 [regarding] John Simpkins. Unfortunately he does not
2 wish to become a witness either. Suggest we rethink."

3 What did you understand the concerns of these
4 individuals at Fujitsu to be about being called as
5 witnesses in the Group Litigation?

6 **A.** I don't believe I knew anything about John Simpkins'
7 concerns. The understanding I had of Steve Parker is he
8 just had a natural reluctance to be a witness and, from
9 those emails, it appears it was because he had had
10 a friend or someone he knew had given evidence somewhere
11 else but I didn't know much more than that.

12 **Q.** Were you aware of, for example, any historic issues
13 within Fujitsu which would mean that individuals were
14 reluctant to give evidence? We've heard, for example,
15 in this Inquiry, about Anne Chambers giving evidence and
16 being unhappy about the situation that she was put in.

17 **A.** Nobody drew my attention to any connection between
18 Steve's concerns and any matters like that.

19 **Q.** I want to move on now to the strategy towards the
20 claimants themselves. Can we please turn to
21 POL00006379. This a document entitled "Litigation
22 Strategy Options" produced for the steering group
23 meeting of 11 September 2017. Was this a document that
24 you produced?

25 **A.** It was either me or my team.

6

1 presently low key, there is increasing chatter in the
2 network and a feeling that the litigation may start to
3 dissuade individuals from being postmasters. This will
4 increase as the litigation continues without a result in
5 Post Office's favour."

6 So, at that stage, the clear recommendation is not
7 to go for attrition because there are, amongst other
8 things, downsides for the business and also the costs to
9 the Post Office in pursuing that would be very
10 significant; is that a fair summary?

11 **A.** Correct. I would also just note there bullet 2 in
12 column 2, which explains that what this means in
13 practice would be agreeing with the claimants' proposals
14 for case management and they, at that time, were
15 advocating a long course for the litigation.

16 **Q.** Thank you. You've addressed this in your witness
17 statement. Can we bring up your witness statement,
18 please. It's page 204. Thank you.

19 Page 204, I think you've set it out at paragraphs
20 357 to 359. I just want to have a look at 357 and 358
21 if we may. You say there:

22 "As for option 5 [that's option 5 from the document,
23 the "Attrition" option] as the paper makes clear, this
24 was not a strategy I recommended because the cost to
25 [the Post Office] would be too high before the claimants

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1 would feel the impact of this approach. Insofar as it
 2 is to be suggested that this approach -- or indeed any
 3 approach which had the effect of applying pressure to
 4 the claimants -- would have been inappropriate (or that
 5 any individual steps that [Post Office] took that put
 6 pressure on the claimants were inappropriate),
 7 I highlight that applying a reasonable degree of
 8 pressure to one's opponent, and/or pursuing strategies
 9 which have the effect of applying pressure to one's
 10 opponent, are part and parcel of an adversarial system
 11 of litigation. It was proper to include this so [the
 12 Post Office] could see the full range of options.
 13 However, at no stage did I recommend that [the Post
 14 Office] adopt this strategy and at no stage did [the
 15 Post Office] instruct me to adopt such a strategy."

16 Just pausing there, you say that it's part and
 17 parcel of an adversarial system of litigation. For you,
 18 does it make any difference whether the party is owned
 19 by the Government or not?

20 **A.** I saw this as an ordinary piece of commercial
 21 litigation.

22 **Q.** Then 358:

23 "More generally, as explained above, where it was
 24 consistent with my duties to the Court, my client and my
 25 professional obligations for [Womble Bond Dickinson] to

1 "On 19 October 2017 there will be a Case Management
 2 Conference. At this court hearing, a judge will decide
 3 on the strategy strategic direction of the Group
 4 Litigation ...

5 "This paper explains:

6 "The nature of a CMC and the court process that may
 7 flow from it.

8 "The general strategic direction that we recommend
 9 is adopted by the Post Office."

10 Is this a document that you produced?

11 **A.** I suspect I was the primary author but it may have had
 12 input from others as well.

13 **Q.** If we scroll over the page, please, there's a section on
 14 overall Post Office strategy and it's very similar to
 15 the strategy that we saw in that email from you
 16 yesterday. I'll just read a few sections from it:

17 "There are no silver bullets in this case that will
 18 dispose of all claims in one go ...

19 "4.2 This leads us to the view that, in the fullness
 20 of time, Post Office may need to address each of the 522
 21 claims individually given the diversity of their
 22 circumstances. Taking [each] case to a full conclusion
 23 through the litigation process is unattractive as it
 24 would take years and the costs would be extremely high."

25 So again, similar: it would cost a lot of money for

1 advise on approaches which had the effect of applying
 2 pressure on Freeths and the Claimants' litigation
 3 funder, these approaches would be explained to [the Post
 4 Office] as advantages of a particular step or action.
 5 However, at no stage did I advocate taking a step purely
 6 for this effect. Where this factor infrequently arose,
 7 there was always an overarching meritorious reason for
 8 recommending a particular course of action, a byproduct
 9 of which may have been to place pressure on the opposing
 10 Legal Team."

11 So you're setting out there that, at no point, did
 12 you recommend that as a strategy, it may be a byproduct
 13 of some other strategy; is that a fair summary of that?

14 **A.** What we're talking about here is what I would call is
 15 a pure attrition strategy, where a party takes
 16 unreasonable points for the predominant purpose of
 17 causing one's opponent to incur costs. I don't believe
 18 I ever advised Post Office to take such a strategy.
 19 There were times during the litigation where there were
 20 meritorious reasons to take a point that had a byproduct
 21 of applying pressure onto the claimants.

22 **Q.** Thank you. Could we please turn to POL00006380.
 23 I think this is another document you've explained in
 24 your witness statement. We're now on 11 September 2017.
 25 It says:

1 the Post Office to pursue that kind of a strategy,
 2 therefore not recommended?

3 **A.** Not to take the entire case to conclusion because what
 4 I was anticipating is there would probably be a series
 5 of thematic trials, followed by eventually having to
 6 deal with the details of 500 plus individual claims, and
 7 I didn't think that was practically feasible.

8 **Q.** "4.3 We believe the better solution is to try to force
 9 the claimants into a collective position where they will
 10 either abandon the claims or seek a reasonable
 11 settlement. It should be remembered that the claims are
 12 financially supported by Freeths (whose fees are at
 13 least partially conditional on winning), a third party
 14 funder and insurers. Without this support these
 15 proceedings would not have been possible. All three
 16 entities will likely have the power to pull their
 17 support if the merits of the case drop below a certain
 18 level. Our target audience is therefore Freeths, the
 19 funder and the insurers who will adopt a cold, logical
 20 assessment of whether they will get a payout, rather
 21 than the Claimants who may wish to fight on principle
 22 regardless of merit."

23 So that isn't advocating, at this point, a strategy
 24 of attrition but it is saying that we need to keep
 25 an eye on those who are actually funding the litigation?

1 **A.** Yes, and the key point of that sentence is that it
 2 refers to the fact that those entities may pull their
 3 support if the merits of the case drop below a certain
 4 level. So this is advocating a merit-based strategy.
 5 **Q.** Does something change over time or is it your position
 6 that that was the approach throughout?
 7 **A.** I think that was largely the approach throughout. Later
 8 in the litigation, I think this is probably around the
 9 time of the trials, I got an impression, but I had no
 10 information, that the claimants' Legal Team were
 11 struggling, potentially, to keep up with the pace. We
 12 were also struggling, to be fair. And we did in -- and
 13 that became a bigger issue to consider, to factor in but
 14 I think always we were advocating strategies that had
 15 merit.
 16 **Q.** Could we please turn to POL00111290. So this is a year
 17 later now, if we scroll down, 1 November 2018 and, as
 18 you say, I think this is probably the document, you may
 19 have been thinking about it, thinking about a third
 20 trial. So it says:
 21 "All
 22 "This is a long email setting out some initial
 23 thoughts on a possible trial in May 2019. I presume
 24 that at some point during the [Common Issues] trial
 25 Fraser will grab one of the free days to talk about this

13

1 I'd like to take you to the fifth one of those, it
 2 begins "We should":
 3 "We should not assume that we have deeper resources
 4 than the [claimants]. We undoubtedly have more bench
 5 strength but every task is much more onerous for us (our
 6 disclosure is at least 10 times larger than the
 7 [claimants]; we will have loads of witnesses, they will
 8 have a few, etc)."

9 Then you say:

10 "That said, my instinct is the [claimants'] funding
 11 is under pressure and they do not want to be burning
 12 money on a 3rd trial."

13 Is this is the turning point you were describing
 14 just now?

15 **A.** I wouldn't describe it as a turning point, it was just
 16 an impression that we began to have, or I began to have
 17 around that time.

18 **Q.** If we please turn to page 5 there is the straw man that
 19 you are setting up for others to comment on. You say as
 20 follows:

21 "Drawing the attached together, I think we need
 22 a plan that can be [flexed] to accommodate the
 23 possibility of an appeal. Also tactically the best
 24 option for [the Post Office] are (i) to force the
 25 [claimants] to burn money and (ii) to target limitation.

15

1 and so we need a plan. The below represents a straw man
 2 for everyone to take shots at.

3 "I appreciate that everyone is extremely busy but we
 4 need to put some time aside with the full Counsel team
 5 to talk through our proposal for May. I'm going to
 6 suggest a [conference] call for Monday at 10.00. Shout
 7 now if you really can't do it.

8 "Also, I'm sure everyone can raise a million reasons
 9 why the below is crazy ... I think it's crazy ... but we
 10 need to find a way forward so we all need a positive (if
 11 deluded) mental attitude!"

12 If we scroll over to the next page, please, "Key
 13 dates". So the Common Issues trial finishes on
 14 6 December, Horizon Issues trial begins 12 March onwards
 15 and you're planning for the future.

16 "General objectives of a third trial

17 "I can see 3, potentially conflicting, objectives
 18 for a 3rd trial:

19 "1. To progress the litigation as a whole towards
 20 conclusion.

21 "2. To secure some form of tactical advantage that
 22 forces the [claimants] to quit/settle.

23 "3. To keep Fraser happy by doing something
 24 'productive' in May '19.

25 "Challenges/factors [for consideration] ..."

14

1 My straw man therefore tries to achieve these objectives
 2 whilst trying not to look tactical!"

3 Then you say, for example:

4 "We agree to a Lead Cases trial of 3 cases",
 5 et cetera.

6 Now the witness statement I took you to before said
 7 that you never advised that as a strategy. Here, we
 8 have, it seems, you're advising that at this point in
 9 time a strategy to force the claimants to burn money; do
 10 you agree with that?

11 **A.** I don't agree with that. This is a straw man discussion
 12 amongst the lawyers with the counsel team. I think
 13 I did forward it to Rodric Williams but it's expressly
 14 under cover of an email that says, "This isn't advice"
 15 I think I used the phrase "brain dump of ideas". These
 16 points were discussed, even here though the strategy is
 17 to target limitation and, if you scroll slightly up in
 18 this email, you can see I set out the advantages of
 19 targeting a limitation issue, so there was reasonable
 20 merit.

21 And, in any event, what happened in practice was
 22 that the trial date moved back and this discussion never
 23 went anywhere. So I don't believe this ever ended up as
 24 actually being advice to the client, as opposed to
 25 a point being discussed amongst the lawyers.

16

1 Q. What is the difference between a "brain dump" to
 2 a client by a solicitor and "advice" from a solicitor?
 3 A. I think Rodric Williams would have understood this, as
 4 an experienced in-house litigator, that this was just
 5 some ideas that were being knocked around amongst the
 6 Legal Team and it wasn't a settled view on the way that
 7 Post Office should have proceeded.
 8 Q. But it was your view as to how they could proceed?
 9 A. It was one option. I think if you scroll through the
 10 entire email, it sets out a whole range of different
 11 options and, as it sets out at the start, it's a starter
 12 for ten for discussion amongst the Legal Team.
 13 Q. Could we turn, please, to the judgment in the Common
 14 Issues trial. That's at UKGI00009458, and it's
 15 page 172. About halfway down that paragraph that's on
 16 the top of the page, so if we scroll up slightly,
 17 Mr Justice Fraser says as follows:
 18 "The Post Office has appeared determined to make
 19 this litigation, and therefore resolution of this
 20 intractable dispute, as difficult and expensive as it
 21 can."
 22 Does that not reflect the advice that you were
 23 giving to Post Office in 2018?
 24 A. As I say, I don't accept that that was the advice that
 25 was given to Post Office. It was an idea being

17

1 Q. Let's turn to that, then. Can we please turn to
 2 WBON0000528, please. This is in 2018, so two years
 3 after that apparent meeting. Now, this is an email from
 4 Amy Prime to you, "Subject: Notes from call with [the
 5 Post Office] on 23 March [2018]". Can you assist us, is
 6 this Amy Prime sending you notes that she took while you
 7 were having this discussion?
 8 A. Give me a moment to read, please.
 9 Q. We can scroll down, if you like. Perhaps I'll take you
 10 through some paragraphs and, at the end, you can tell me
 11 how you think this was formulated?
 12 A. Thank you.
 13 Q. She says:
 14 "Andy
 15 "Notes from the beginning of the call below:
 16 "BEIS and UKGI are taking a more proactive approach,
 17 two issues with this (1) in relation to piece of
 18 litigation they got stung so worried about no surprise
 19 in [Post Office litigation]; and (2) wish to protect
 20 public money and value for money so being quite
 21 intrusive. Bill of £110 million in compensation to
 22 supplier in nuclear procurement deal which has caused
 23 more intrusive oversight."
 24 It then refers down there to Tom Cooper. So Tom
 25 Cooper was from UKGI, he sat on the Board of the Post

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1 discussed amongst the lawyers and, ultimately, it never
 2 came to fruition because the trial date moved back and
 3 matters moved on. I don't think, actually, decisions
 4 around trial 3 were made for several months after that
 5 point.
 6 Q. I'm going to move on to another topic now and that's the
 7 Post Office's relationship with Government and UKGI.
 8 Rodric Williams has given evidence to this Inquiry
 9 describing a meeting in the middle of 2016 with the
 10 Department for Business -- I think he said that you were
 11 present at that meeting -- where the Department was
 12 asked by the Post Office to be able to conduct the
 13 litigation without external influence. Is that
 14 a meeting you have any recollection of?
 15 A. I'm afraid I have no recollection of that.
 16 Q. Do you think it's likely you attended a meeting with the
 17 Department for Business in mid-2016?
 18 A. I don't recall -- I don't recall any meetings with the
 19 Department for Business. I recall --
 20 Q. UKGI?
 21 A. Sorry, or UKGI. I recall briefing one of the Board
 22 directors who had been appointed by UKGI, I think there
 23 were some UKGI attendees at that meeting.
 24 Q. Was that Tom Cooper?
 25 A. It was Tom Cooper.

18

1 Office as well; is that right?
 2 A. Yeah, he was on the Board of directors at Post Office
 3 and, as I understood it, UKGI had the power to appoint
 4 a director to the Board.
 5 Q. So it says:
 6 "... question whether we are tying him down to
 7 an information sharing structure and signing
 8 [a non-disclosure agreement]? Not NDA, director of
 9 company so has confidentiality undertakings already.
 10 Appointment letter has made issues with confidentiality.
 11 UKGI want Tom to tell UKGI what he wants to and not be
 12 constrained in his emailed to share information."
 13 So it looks as though there is a concern being
 14 expressed at this meeting about the ability for Tom
 15 Cooper, who sat on the Post Office Board, to share
 16 information with UKGI; is that your recollection of the
 17 discussion?
 18 A. It's not my recollection because I'm not sure that I was
 19 on this call or not but that appears to be what the
 20 words are saying there.
 21 Q. Do you recall an issue at this point in time arising
 22 from UKGI wanting to know more about the litigation and
 23 perhaps the Post Office pushing back on that information
 24 sharing?
 25 A. I was aware that there was an issue with information

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1 sharing with UKGI, particularly around sharing
 2 privileged information with UKGI and how to do it in
 3 a way that would maintain privilege.
 4 **Q.** Was that a concern that you personally had?
 5 **A.** I would always be concerned about issues around
 6 privilege and making sure that Post Office were properly
 7 advised on those issues.
 8 **Q.** Having read just those couple of paragraphs, are you
 9 able to assist us any further with how this note might
 10 have come about?
 11 **A.** I'm afraid not. I don't recall this note and I don't
 12 recall the call that it appears to be referring to.
 13 **Q.** "After CCRC material, deeply suspicious about ability of
 14 UKGI to control flow of information."
 15 Is that something that you're able to assist us
 16 with?
 17 **A.** I'm afraid not.
 18 **Q.** It looks as though there was a concern that UKGI had
 19 shared some information relating to the Criminal Cases
 20 Review Commission; is that something you recall anything
 21 about?
 22 **A.** I don't recall that.
 23 **Q.** If we scroll down slightly more:
 24 "Will give board update on progress of [litigation]
 25 as per [Womble Bond Dickinson] speaking notes.

21

1 board and UKGI were mainly handled in-house by the Post
 2 Office Legal Team. I recall there was a concern, not
 3 about providing written updates but just the sheer
 4 volume of written updates that were being requested and
 5 the capacity and practicality of providing them.
 6 **Q.** The suggestion here, though, seems to be, to use the
 7 language we were speaking about yesterday, updating on
 8 a verbal basis, rather than a written basis. As you
 9 say, you've expressed concerns about privilege.
 10 **A.** Mm-hm.
 11 **Q.** Do you recall those kinds of concerns in relation to
 12 UKGI?
 13 **A.** I recall that Post Office had concerns about, if they
 14 provided information to UKGI, where else would it then
 15 go after that? Other than that high level, I don't
 16 recall what the detail was or what caused Post Office to
 17 have those concerns.
 18 **Q.** The final document on that topic, can we please turn to
 19 POL00041770. If we start on page 2, please, the second
 20 half of page 2. I think you've addressed this in your
 21 witness statement at paragraph 433. We don't need to
 22 turn to the witness statement but, if we could just have
 23 a look at this email from Elizabeth O'Neill at UKGI to
 24 Rodric Williams, it's about agreeing a protocol with
 25 UKGI, I think, for information sharing. She says:

23

1 "Discuss protocol for engagement with UKGI and
 2 concerns with appointment of Tom Cooper."
 3 Do you recall at this period a wish for Mr Cooper to
 4 stick to notes that were prepared by Womble Bond
 5 Dickinson to update UKGI, rather than, for example,
 6 being able to speak freely?
 7 **A.** I don't recall -- I don't recall that issue being raised
 8 with me.
 9 **Q.** If we scroll down, please, over the page, to near the
 10 bottom of that page. It says:
 11 "Alex Chisholm is accounting officer for Post Office
 12 and accountable for spend in [Post Office] to
 13 ministers."
 14 It says at the bottom:
 15 "Subcommittee papers to be kept to a minimum and
 16 updates from Committee to Board to be verbal, Tom Cooper
 17 will be updating UKGI which causes issues with directors
 18 duties."
 19 It might be suggested that that is quite consistent
 20 with some of the advice that we saw from you yesterday,
 21 keeping papers to a minimum, updates to the Board to be
 22 verbal. Is that advice that you gave in relation to
 23 UKGI at this time?
 24 **A.** I don't believe I was deeply involved in these
 25 discussions. The arrangements between Post Office's

22

1 "Thanks for your markup of the protocol. It looks
 2 as though we are still a long way apart on this as your
 3 draft doesn't recognise a number of things that are
 4 essential to us in order to fulfil our function as
 5 shareholder and representative of the [Secretary of
 6 State].
 7 "So I thought it would be helpful to provide some
 8 important background and explain the context in which
 9 are operating:
 10 "Alex Chisholm is the accounting officer for [the
 11 Post Office] and as such is accountable to Parliament
 12 for its actions. In order to properly fulfil this role,
 13 he requires full and comprehensive information on the
 14 progress of this litigation. This will not be possible
 15 if [Post Office] is not willing to provide written
 16 updates. We revised our requirements to provide for
 17 updates following reports to the Board to reduce any
 18 administrative burden as far as possible, but we cannot
 19 agree to a protocol which includes no obligation on
 20 [Post Office] to report progress in writing in the
 21 litigation."
 22 So UKGI seemed to have the impression, at this
 23 stage, that the Post Office don't want to report in
 24 writing relating to the litigation.
 25 If we scroll up to the email above from Jane

24

1 MacLeod, she says:
 2 "Andy, Rod
 3 "I am very concerned about this, and I'm struggling
 4 to see a way through this. Paula has offered a meeting
 5 with Alex Chisholm to explain the issues, and that may
 6 be the only way [to] get round this", and asks for
 7 thoughts.
 8 If we scroll up to the first page, you're included
 9 in this email chain but I don't think you have any
 10 comments to make on this chain. If we scroll down,
 11 please, we see, at the bottom email, Patrick Bourke,
 12 11 May, it says:
 13 "I have just come off the phone to Richard Callard
 14 when this came up.
 15 "Andy, Rod -- shall we get on a call?"
 16 Do you remember any call in 2018 relating to this
 17 issue?
 18 **A.** I think I did have a call but I can't remember the
 19 details of it.
 20 **Q.** Looking at this and just from your general reflections,
 21 to what extent do you consider the Government and UKGI,
 22 so far as you were aware, were properly sighted on the
 23 progress of the litigation?
 24 **A.** That's difficult for me to comment on because I had
 25 limited visibility as to what information was moving

25

1 **Q.** Are you able to assist us with how these kinds of
 2 minutes would be agreed?
 3 **A.** Because this was with Brian, the minutes would have been
 4 prepared by Gavin Matthews, so I don't know what process
 5 he followed. I don't recall though I think,
 6 specifically on this minute, I remember, I think, this
 7 went to Brian for approval, I think.
 8 **Q.** Brian Altman?
 9 **A.** Brian Altman.
 10 **Q.** Thank you. If we please could turn over the page to the
 11 bottom of the second page. We can see there in this
 12 draft version the penultimate paragraph, please. It
 13 says:
 14 "In relation to the cut-off date, 1 January 2010 was
 15 close to the Horizon Online rollout. Prior to the
 16 [Horizon Online] rollout there was a cash audit done so
 17 that all [Post Office] branches balanced."
 18 If we turn to page 4, we can see these are
 19 an updated version of the minutes and, if we turn to
 20 page 6, we can see the same paragraph there. It's
 21 slightly changed, so it now says:
 22 "In relation to the cut-off date, 1 January 2010 was
 23 close to the Horizon Online rollout. Prior to the
 24 [Horizon Online] rollout there was a cash audit done so
 25 that all [Post Office] branches balanced. [Brian

27

1 from Post Office to UKGI, that was mainly handled by the
 2 Post Office in-house.
 3 **Q.** From those who we saw copied in or sending those emails,
 4 did they ever give you any impressions about the desire
 5 to which they wanted to share or not share information
 6 with UKGI?
 7 **A.** Yeah, there were concerns expressed by, I think, mainly
 8 Jane MacLeod and Rodric Williams about sharing
 9 privileged information with UKGI. That's not because
 10 they didn't want to give it to UKGI; they just wanted to
 11 make sure it was being provided in a way that maintained
 12 privilege and confidentiality around that information
 13 but, beyond that, that was the only impression I had.
 14 **Q.** Did you provide advice in that respect?
 15 **A.** I provided some advice around how they might mark up the
 16 protocol to cover privilege issues.
 17 **Q.** Thank you. I'm going to move on to my penultimate
 18 topic, certain advice given by Brian Altman. Could we
 19 start with POL00333855, please. These are notes of
 20 a conference on 9 September 2013. First of all, if we
 21 scroll down slightly so you can see some of the
 22 handwritten markings, are you able to assist us with
 23 whose handwriting that is?
 24 **A.** It's not mine but I couldn't tell you whose it was
 25 otherwise.

26

1 Altman] advised that there was no positive duty to seek
 2 out individuals pre-1 January 2010 but if [the Post
 3 Office] was approached it would need to make
 4 case-specific decisions on disclosure."
 5 So it has that extra sentence added there. If we
 6 could also, please, turn to page 3 of this document, we
 7 can see there, in this first version, there's another
 8 section on Mr Altman's advice:
 9 "[Brian Altman] advised considerable caution in
 10 relation to mediation cases involving previously convict
 11 individuals (Seema Misra has already indicated
 12 an intention to be within the scheme). The concern is
 13 that lawyers acting for those individuals may be using
 14 the scheme to obtain information which they would not
 15 [and somebody has put in the word 'normally'] be
 16 entitled to in order to pursue an appeal."
 17 If we turn to page 6, the updated version, we see
 18 there that the word "normally" has been put into that
 19 paragraph, so there seems to be a process by which
 20 somebody is making handwritten changes and the minutes
 21 are updated.
 22 Could we please have on screen, side by side, the
 23 current document, and also POL00333856. If we start on
 24 the first page on both, please, now on the 856 version,
 25 there is also handwriting. Could we scroll down. If we

28

1 keep on scrolling over the page, we can see some more
2 handwriting. Are you able to assist us at all with that
3 handwriting?

4 **A.** No, other than to say it's not mine.

5 **Q.** You can see that, if we put that side by side with 855
6 but we look at page 2 of 855 -- sorry, actually, if we
7 go down the page on the left-hand side to the bottom of
8 the page -- thank you very much -- that's the "in
9 relation to the cut-off date" section. On the
10 right-hand side, if we look at the bottom of page 2,
11 please, we can see that that wasn't in the original and
12 has been added in, and we saw the further, final
13 version, which had those handwritten notes added.

14 We can see the same, if you go to page 3, on the
15 left-hand side, and 3 on the right-hand side. So the
16 right-hand side had "normally" added and that's now in
17 place on the left-hand side.

18 It looks as though quite a lot of care has been
19 taken over the minutes. Is that your understanding of
20 the practice of your firm around this time, taking these
21 kinds of minutes?

22 **A.** I don't recall that I was involved in the preparation of
23 these minutes, so I couldn't comment as to -- I suspect
24 they were prepared by Gavin and I can't comment as to
25 what approach he took.

29

1 Disclosure and Duty to Retain)."

2 Then Simon says:

3 "Think [Post Office] have resolved those issues."

4 If we move on to the actual notes that we've just
5 been looking at, can we look at POL00021998, and the
6 bottom of the first page, the note says:

7 "[Rodric Williams] then confirmed that the weekly
8 hub meetings were starting to bed in, picking up any
9 issues across the business which may relate to Horizon,
10 [Simon Clarke] said there had been some 'cultural
11 issues' at the start which had now been overcome but he
12 thought it was necessary to put duties on individuals",
13 et cetera.

14 There is no mention there of the Simon Clarke Advice
15 on the duty to retain, the shredding advice, as we know
16 it. Can you assist us with why that might be?

17 **A.** I wasn't author of these minutes, unfortunately I can't.

18 **Q.** Do you recall at that meeting that issue being
19 discussed?

20 **A.** I don't recall the meeting.

21 **Q.** You don't recall the meeting at all?

22 **A.** I recall there was a meeting, I don't recall the content
23 of the meeting.

24 **Q.** Final topic: Scotland, Northern Ireland. What was your
25 understanding of the Post Office's legal advisory

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1 **Q.** The section there on Brian Altman advising considerable
2 caution, is that something that you recall from the
3 meeting?

4 **A.** I don't recall it specifically from the meeting, but the
5 general tenor of that advice I recall around that time.

6 **Q.** Advice coming from Mr Altman himself?

7 **A.** From Mr Altman and also Cartwright King.

8 **Q.** Thank you. Could we please move on to POL00139866.
9 This is Simon Clarke's own note of that particular
10 meeting -- Martin Smith's note of that meeting, thank
11 you very much.

12 If we scroll over the page, please, we can see
13 a section there, halfway down, it says:

14 "Simon: We discussed last Friday: main problem is
15 cultural. People in different departments. Needs to be
16 a proper coming together.

17 "Rod: A lot of issues not important -- eg turn
18 computer off and then on again. And then things which
19 may affect continuity -- still need a steer.

20 "Simon: We said we would write a protocol: roles and
21 responsibilities etc, centrally archived: owners of
22 issues."

23 Then it says this:

24 "QC: Refers to a couple of non-identified
25 individuals (referring to [Simon Clarke's] Advice on

30

1 arrangements for the devolved nations?

2 **A.** In all regards, do you mean or --

3 **Q.** Yes. Did you have any particular understanding about
4 their actions in Scotland, Northern Ireland or any
5 involvement in those?

6 **A.** I -- from a civil side, I believe they operated the same
7 way as they did in England. On a criminal side,
8 I understood that there was -- that they couldn't bring
9 private prosecutions in Scotland. I can't remember what
10 the position was in Northern Ireland.

11 **Q.** Did any cases from Scotland or Northern Ireland fall
12 within the remit of the things that you were advising
13 on?

14 **A.** Yes, because there were cases from Scotland and Northern
15 Ireland within the Group Litigation.

16 **Q.** And outside of the Group Litigation?

17 **A.** There may have been some in the Mediation Scheme as well
18 but I now can't recall.

19 **Q.** Did you have any involvement with Scottish firms
20 instructed by the Post Office at any stage?

21 **A.** I can't recall any but I may have done, but I can't
22 recall.

23 **Q.** How about the Scottish CCRC?

24 **A.** I don't recall any.

25 **MR BLAKE:** Okay. Thank you very much.

32

1 Sir, those are all of my questions.
 2 **SIR WYN WILLIAMS:** Right. Now, is it still the case that we
 3 have three would-be questioners --
 4 **MR BLAKE:** That's correct, yes.
 5 **SIR WYN WILLIAMS:** -- and that one is -- well, have they
 6 agreed an order between them? Let me put it in that way
 7 first?
 8 **MR BLAKE:** I believe they have although I think they would
 9 appreciate our first morning break now, if possible,
 10 before we begin.
 11 **SIR WYN WILLIAMS:** Yes, well, I've got no problem with that.
 12 Given the timescales that you've mentioned to me for
 13 questioning, we can take 15 minutes, can we not?
 14 **MR BLAKE:** Absolutely.
 15 **SIR WYN WILLIAMS:** So we'll resume at 10.45.
 16 **MR MOLONEY:** Sir, for the benefit of (*unclear -- microphone*
 17 *off*) can I indicate that, during the course of the
 18 morning, Mr Blake has dealt with the document that
 19 I intended to focus on with Mr Parsons, so I can now say
 20 that the Inquiry will not be burdened with questions
 21 from me.
 22 **SIR WYN WILLIAMS:** Well, it's never a burden, Mr Moloney,
 23 but thank you for letting me know.
 24 **MR BLAKE:** In that case, it will be Mr Stein followed by
 25 Mr Henry -- ah, Mr Jacobs followed by Mr Henry.

33

1 **MR BLAKE:** Thank you, sir.
 2 Just to add, Ms Dobbin has a few questions, as well.
 3 **SIR WYN WILLIAMS:** Oh, well, if we're talking about minutes,
 4 then that's no problem.
 5 **MR BLAKE:** Thank you very much.
 6 (10.34 am)
 7 (A short break)
 8 (10.50 am)
 9 **SIR WYN WILLIAMS:** Are we ready? Yes. I can see Mr Jacobs
 10 preparing his microphone.
 11 **MR JACOBS:** Thank you, sir. Can you hear me, sir?
 12 **Questioned by MR JACOBS**
 13 **SIR WYN WILLIAMS:** Yes, I can, thank you very much.
 14 **MR JACOBS:** Mr Parsons, good morning. I ask questions on
 15 behalf of 156 subpostmasters who are Core Participants
 16 in this Inquiry and are represented by Howe+Co. Some of
 17 our clients attended the Inquiry yesterday and are here
 18 today, and many, many others are watching remotely
 19 through the live feed.
 20 The view that they've expressed, and I think you
 21 were asked a question yesterday on the same point, is
 22 that you became too close to your client. We saw
 23 yesterday, after the Panorama programme in 2015, you
 24 asked a question of your client whether the Post Office
 25 could start attacking the postmasters' credibility,

35

1 **SIR WYN WILLIAMS:** Mr Jacobs, fine. So that's the order.
 2 Just so that we can plan it properly, Mr Jacobs is of
 3 the order of half an hour, yes?
 4 **MR JACOBS:** Sir, I hope to be shorter but, yes, about half
 5 an hour, sir.
 6 **SIR WYN WILLIAMS:** That's fine, and Mr Henry an hour?
 7 **MR HENRY:** Sir, would you --
 8 **SIR WYN WILLIAMS:** I think we will -- sorry, Mr Henry.
 9 **MR HENRY:** I do apologise. I didn't mean to cut across you.
 10 I just wanted to see if it might be possible that
 11 I could take an hour and ten.
 12 **SIR WYN WILLIAMS:** All right. I don't think there's any
 13 problem with that. It's just ensuring that the
 14 stenographer has an appropriate break as between
 15 Mr Jacobs and you. Can I ask you, Mr Henry, do you want
 16 to do your hour and ten in one go, preferably or would
 17 you be happy to have a break in the middle of it?
 18 **MR HENRY:** I'd be very happy to have a break in the middle
 19 of it, if that is what you and the shorthand-writer
 20 would like, sir.
 21 **SIR WYN WILLIAMS:** Right. Well, we'll see how we go and
 22 I'll bear all those things in mind.
 23 So we'll have our first break now and, since I've
 24 been talking in the 15 minutes, we'll start at 10.50,
 25 Mr Blake.

34

1 calling people out as the "liars and criminals that they
 2 are", your words, page 111 of the transcript from
 3 yesterday.
 4 Mr Parsons, you had a client which was behaving
 5 badly but, instead of taking a step back, you joined in
 6 with what they were doing. You joined in and helped
 7 them, essentially, throwing subpostmasters under the
 8 bus.
 9 Now, my question for you is, having been taken to
 10 the documents that Mr Blake took you to yesterday and
 11 today, are you now able to accept that that is what you
 12 did?
 13 **A.** Back at the time, I accept that some of the language
 14 I used was too strong. I look back on some of the
 15 decisions we made and think now we could have made
 16 different decisions and, as I say in my statement,
 17 I apologise for the mistakes my firm made along the way.
 18 But back -- if we're talking back at the beginning of
 19 the process, at that time, I understood Post Office to
 20 have a fairly arguable case, that Horizon worked and, as
 21 a result of that and being their lawyer, I am required
 22 to advance their case on their behalf.
 23 **Q.** Mr Parsons, did you conspire with your client to
 24 downplay important matters so as to keep subpostmasters
 25 in the dark about the very issues which have given rise

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1 to this public scandal?
 2 **A.** I never conspired with my client in that regard. We
 3 would consider each matter as it came up. Some issues
 4 we thought were more important than others, some issues
 5 we would emphasise more than others and some issues,
 6 which we considered irrelevant, we would de-emphasise.

7 **Q.** Well, on the topic, then, of conspiring to downplay
 8 important matters can we look at POL00129392 and it's
 9 page 2 of 3, if we could scroll down.

10 Mr Parsons, while we're waiting for that to come up
 11 on our screens, it's an email dated 17 June 2014, which
 12 you sent to Chris Aujard, Jarnail Singh, Angela van den
 13 Bogerd, Belinda Crowe and others. We'll just wait for
 14 it to emerge.

15 Thank you. If we could go down to page 2., and
 16 further down, please. So it's this email here. So it's
 17 from you and you say:

18 "I've just spoken with [Cartwright King] about a new
 19 CQR from Howe+Co that references the Helen Rose Report."

20 Then you talk about the Rose Report being
 21 retrospectively disclosed in a number of prosecution
 22 cases, drawing into question statements made by Gareth
 23 Jenkins, and a copy of the report has made its way to
 24 Howe+Co.

25 The paragraph I want to highlight is the paragraph
 37

1 responding to CQRs."

2 My question for you, Mr Parsons, is: looking at this
 3 document, this clearly shows, doesn't it, that you were
 4 concerned that Howe+Co were on the brink of discovering
 5 that Post Office's expert in Horizon-based prosecutions
 6 had not been credible; that's what you were downplaying
 7 or advising to downplay, isn't it?

8 **A.** I think it's important to understand that the Helen Rose
 9 Report contained two separate pieces of information
 10 within the same document. One is the Gareth Jenkins
 11 issue, which was being addressed by the criminal
 12 lawyers, Cartwright King, and they had made a decision,
 13 some, I guess, nine months before this, to disclose the
 14 Helen Rose Report without telling subpostmasters about
 15 the Gareth Jenkins connection.

16 The second issue in the Helen Rose Report is about
 17 the reversal of transactions, which was the subject of
 18 spot review number 1. Now, from my perspective of
 19 advising on the scheme, where prosecution issues weren't
 20 being considered, the relevant part of that report was
 21 the auto reversal of transactions in spot review one.
 22 So that's my primary viewpoint on it. However, reading
 23 this again now, it seems to me that there was a more --
 24 there was a greater underlying problem here, which was
 25 the original disclosures by the criminal lawyers, and
 39

1 that begins "The point of concern", the third paragraph.

2 "The point of concern is that the M060 CQR is
 3 starting to make the link between (1) the fact that the
 4 [Helen Rose] Report makes it clear that [Gareth Jenkins]
 5 knew of issues with Horizon and (2) the fact that
 6 [Gareth Jenkins] never mentioned these issues in his
 7 prosecution evidence (see paragraph 53 ...)."

8 We don't have the CQR to hand.

9 Then you say:

10 "This line of inquiry draws into question the
 11 credibility of [Gareth Jenkins'] evidence."

12 Then you make a criticism or potential criticism of
 13 Howe+Co, and you say:

14 "The sharing of the [Helen Rose] Report between
 15 applicants is potentially a breach of solicitors
 16 ethics/contempt of court. However, [Cartwright King]
 17 and I don't believe attacking the solicitors on this
 18 point would be of benefit -- if anything it may draw
 19 more attention to the [Helen Rose] Report."

20 Then scrolling down again, the advice you give to
 21 your client is:

22 "Instead, our preferred approach is to downplay the
 23 importance of the [Helen Rose] report in any [Post
 24 Office] investigation reports. We recommend minimising
 25 or ignoring entirely the [Helen Rose] Report when
 38

1 not drawing out that Gareth Jenkins connection.

2 **Q.** But it's you, isn't it, giving the advice to downplay
 3 the importance of the Helen Rose Report, not Cartwright
 4 King. You're advising Post Office to minimise and
 5 ignore and downplay the report because you were
 6 concerned that Howe+Co were joining the dots together
 7 and would find out about Gareth Jenkins. This is what
 8 the email says, isn't it?

9 **A.** That was one of the concerns but I would just note, if
 10 you just scroll up slightly in that email, I believe it
 11 says, "I've just spoken to Cartwright King".

12 **Q.** Yeah, yeah?

13 **A.** And when it says "our approach", that is clearly
 14 referencing the joint approach of both the criminal
 15 lawyers and the civil lawyers.

16 **Q.** The Helen Rose Report was a Pandora's box, effectively,
 17 for solicitors acting for subpostmasters because it
 18 would enable them to challenge the Post Office and say
 19 on the reversals and the remote access points, "Well,
 20 you need to prove that the figures that you are accusing
 21 us of inputting actually came from the subpostmaster and
 22 not from the system or from Fujitsu". That would have
 23 been an enormously important thing for Howe+Co and other
 24 lawyers representing people to have known about; that's
 25 right, isn't it?
 40

1 A. Sorry, as I understood it, Howe+Co had the Helen Rose
 2 Report. The only information that had been redacted
 3 from it was personal data. Those redactions were
 4 applied by the criminal lawyers, so I believe the rest
 5 of the issues in the report were there to be read.
 6 Q. But not Gareth Jenkins?
 7 A. No, correct. Gareth Jenkins' names had been redacted by
 8 the criminal lawyers.
 9 Q. Well, you confirmed yesterday, didn't you, in questions
 10 put to you by Mr Blake, that you advised that Gareth
 11 Jenkins' name should stay redacted?
 12 A. As I said yesterday, I was passing on the advice of the
 13 criminal lawyers.
 14 Q. Let's have a look, shall we, going further up the email
 15 chain. So we need to scroll back up again, please.
 16 This was Jarnail Singh's response to the email I have
 17 read out, and he says:
 18 "Andy
 19 "I am happy with the proposed approach and it's
 20 sensible in the circumstances ..."
 21 Then he talks about issues being dealt with on
 22 a case-by-case basis.
 23 My question for you is: what circumstances was
 24 Jarnail Singh talking about? Don't you think he was
 25 referring to evidence having come to light which would

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1 about the original decision back in, I guess, mid-2013
 2 following the Clarke Advice and the disclosure of the
 3 Helen Rose Report by the criminal lawyers, as to why
 4 they redacted Gareth Jenkins' name and why they didn't
 5 call out at that point the connection. At this stage,
 6 I'm looking to pass on the advice from the criminal
 7 lawyers -- which is their decision, they've made those
 8 choices, I'm not a criminal lawyer -- and I'm looking at
 9 it also from the perspective of the scheme. As I say,
 10 from a scheme perspective, it's a different question.
 11 Q. I don't want to repeat myself, Mr Parsons, but this is
 12 you advising your client. This isn't a Cartwright King
 13 letter, it's your letter, isn't it?
 14 A. It is but I think it's clear from the email sent below
 15 that I'd spoken to Cartwright King, it reflected
 16 a combined approach, and they're all copied on the
 17 email.
 18 Q. We're now in 2024. It's right, isn't it, Mr Parsons
 19 that if you hadn't advised Post Office to downplay,
 20 minimise or ignore the Gareth Jenkins issue in June
 21 2014, the last ten years of the lives of hundreds of
 22 subpostmasters, who have been convicted, bankrupted,
 23 lost their reputations, would have been very different.
 24 Do you see that?
 25 A. I do see that but, as I say, I think that goes back to

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1 cast doubt on Post Office's assertion that Horizon was
 2 robust? Those were the circumstances: he knew and Post
 3 Office knew that their robust mantra could no longer be
 4 maintained.
 5 A. I don't know what circumstances Jarnail Singh was
 6 referring to there.
 7 Q. Well, isn't the inference that when he says, "I am happy
 8 to take your advice and it's sensible in the
 9 circumstances", that you would know or there would be
 10 an understanding between you as to what the
 11 circumstances were?
 12 A. I'm reading that now and I can't tell you what Jarnail
 13 Singh had in mind at that point.
 14 Q. You had read the Simon Clarke Advice, I think, about
 15 nearly a year earlier.
 16 A. Mm-hm.
 17 Q. Do you think he was referring to that because you were
 18 referring to Gareth Jenkins' credibility in the email?
 19 A. He could quite possibly, especially given that he was
 20 a criminal lawyer at Post Office.
 21 Q. So, essentially, what you were doing for your client was
 22 covering up the subject matter of the Clarke Advice,
 23 weren't you?
 24 A. I don't think that's a fair characterisation of it.
 25 I think the -- I think there is a question to be asked

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1 the original problem back in 2013 and the decisions Post
 2 Office made around their criminal disclosures at that
 3 point in time.
 4 Q. I want to move on to another topic, which is the conduct
 5 of the Mediation Scheme. I'm just going to take you
 6 to -- I'm going to refer you to a couple of statements
 7 you made in your witness statement. We don't need to
 8 turn them up. At paragraph 149.2 of your statement, you
 9 say:
 10 "If a case went to mediation, a lawyer from WBD
 11 would attend in person to represent POL. I recall
 12 attending two or three mediations personally but
 13 generally this was done by members of the WBD team who
 14 I supervised."
 15 That's right, isn't it?
 16 A. Sorry, can you give me the reference again, it hasn't
 17 come up.
 18 Q. Yes, it's paragraph 149.2.
 19 SIR WYN WILLIAMS: I think, Mr Parsons, Mr Jacobs was
 20 wanting to do this without getting this up on screen but
 21 you want it up on screen so that you can see it?
 22 A. I've got a hard copy.
 23 MR JACOBS: You have a hard copy. That might save time. So
 24 you've got that, haven't you?
 25 A. Yes.

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1 Q. I'll just read at paragraph 253.3 of your statement,
2 that might involve a bit of rapid page turning on your
3 part. I'll read it out while you're doing that. You
4 say:
5 "I was not of the view that POL were refusing to
6 engage properly in the mediation process."
7 Now, my question to you is: you must have been
8 aware, Mr Parsons, that, in practice, the Post Office
9 approach to mediations was disingenuous and amounted to
10 a sham. Post Office were not mediating in good faith,
11 were they?
12 A. I don't accept that.
13 Q. Well, I'll develop my questions to you. Because we've
14 spoken to many of our clients and let me tell you what
15 one of our clients, Peter Holloway, has told us what
16 happened to him. He says he spent a lot of work
17 preparing for the mediation, turned up, presented what
18 he wanted to say, produced lots of documents in support
19 of his arguments and then everybody went away and the
20 mediator came back to see him at about 3.00 in the
21 afternoon, looking tired, Mr Holloway says haggard, and
22 the mediator apologised to him and he said "Post Office
23 are refusing to make any offer". He couldn't quite
24 believe it. He said that "The Post Office
25 representatives had been sent to the mediation with

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1 offers, which were derisory, was they were using the
2 mediations to strengthen the position of Post Office
3 against future claims, weren't they?
4 A. I think it's fairly ordinary for two parties at
5 a mediation who reach an arrangement to enter into
6 a settlement and agreement of future claims.
7 Q. But making very derisory offers that didn't represent
8 the sort of claims that were made in the Group
9 Litigation.
10 A. I think two parties to a mediation will always have
11 different views as to the value of offers put. As
12 I say, Post Office went into those mediations in good
13 faith, having considered every case. That was my
14 understanding.
15 Q. Well, it's not good faith, is it, Mr Parsons, to send
16 representatives into a mediation with instructions to
17 make no offer and not to settle?
18 A. Well, I hope I explained that just a minute ago, that
19 the intention -- I accept that some mediations were
20 conducted on the basis that there was no mandate to
21 settle but the intention was to go and hopefully explain
22 Post Office's position, and it was thought there was
23 still value in having that conversation.
24 Q. Can I put to you an explanation of Post Office's
25 position in the mediations that has already been

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1 express instructions not to settle at all".
2 This isn't just Mr Holloway telling us this. We've
3 spoken to at least a dozen other clients who attended
4 mediations and they all say that Post Office sent
5 representatives, Bond Dickinson were there, to
6 mediations with no authority or instructions to settle.
7 That's what is what was going on, isn't it?
8 A. So each case was assessed on its own merits. Some of
9 those cases we advised Post Office to settle, some of
10 them we advised Post Office not to settle. There was
11 then a discussion internally about whether performance
12 should still attend mediations where it had no mandate
13 to settle, and the view taken was that it was
14 appropriate still to attend those mediations so that the
15 issues between the parties could be discussed. I can
16 understand why that would have been frustrating for some
17 of your clients but it was a decision taken in good
18 faith at the time.
19 Q. Well, there were offers made in some cases but our
20 instructions from our clients are the offers were always
21 derisory, and we've heard Paula Vennells talk about
22 token offers, and they were made on the basis that the
23 subpostmaster agreed not to bring any action in the
24 future against the Post Office. So, essentially, what
25 Post Office were doing, in the few cases where they made

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1 received in evidence by the Inquiry, and it comes from
2 Alan Bates. In his witness statement at
3 paragraph 157 -- and we don't need to put it on the
4 screen but the reference is WITN00050100 -- what
5 Mr Bates says is:
6 "I believe the Mediation Scheme failed as it was
7 part of a cover-up by POL. I expect POL discovered
8 things they did not like and did not want to come out.
9 There was definitely an element of not wanting to accept
10 fault. I believe POL had no intention whatsoever of
11 getting to a mutually acceptable and fair decision. If
12 anything, it seemed as if POL had been using the scheme
13 as a fishing expedition to see what evidence
14 subpostmasters actually had about Horizon."
15 My question for you, Mr Parsons, is that Alan Bates
16 is right, isn't he? You supervised this; you were using
17 the Mediation Scheme in an adversarial way in order to
18 obtain some sort of tactical advantage against the
19 subpostmasters?
20 A. I don't recognise that description of the Mediation
21 Scheme. My understanding is Post Office went into it in
22 good faith with an intention to reinvestigate the 150
23 cases and, where those cases showed errors on Post
24 Office's part, it was willing to settle.
25 Q. My final questions for you: in your witness statement,

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1 you haven't made any apology or statement of regret for
2 your actions and many of our clients have been aghast at
3 the content of the evidence that you've given, the
4 emails that Mr Blake took you to yesterday.

5 Sally Stringer is one of our clients and she emailed
6 Mr Enright, who sits next to me, at 10.20 this morning,
7 and what she says of you and your evidence:

8 "His evidence is the absolute epitome of arrogance,
9 deceit, corporate corruption and is an absolute
10 disgrace."

11 I suppose you might think that's quite strong
12 language, Mr Parsons?

13 **A.** I have apologised within my statement and, to make it
14 clear, I'll apologise again now. During my time acting
15 for Post Office, we made some mistakes along the way.
16 I apologised for them at the time and I apologise to
17 your clients for them now.

18 **Q.** Do you have anything to say for the suffering that Post
19 Office's advice and your advice to Post Office caused to
20 clients of ours, such as, for example Ms Stringer and
21 Mr Holloway?

22 **A.** Unfortunately, I don't know them personally.
23 I recognise the suffering of some of the subpostmasters
24 and, to the extent that mistakes I made contributed to
25 that, I apologise.

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1 I defended it along those lines.

2 **Q.** That was the mantra, that was the creed, but you could
3 see that that fundamentalist approach -- you must have
4 seen that that fundamentalist approach -- had yawning
5 gaps in it but you didn't confront your client about
6 that, did you?

7 **A.** I don't think it's fair to characterise it that way.
8 I think from the start, back when I began, which was
9 mid-2013, the group that I was working with had in their
10 mind that there could be another version of events out
11 there. They believed Horizon was a reliable system but
12 they were open to the possibility of it not being.

13 **Q.** They were open to the possibility?

14 **A.** They were open to the possibility of it and that is why
15 they decided, in my view, to open up a mediation scheme
16 to allow subpostmasters to raise those issues.

17 **Q.** You know perfectly well why the Mediation Scheme was set
18 up. You must have gathered that it was Paula Vennells'
19 idea, "We've been lumbered with this liability by the
20 Royal Mail Group, let's try and tie it all up, and get
21 rid of it as cheaply as possible, and avert the risk of
22 a class action". That's the whole point: it was
23 grudging; it was insincere; it was cynical.

24 **A.** No, I think it's fair to say that Post Office believed
25 the Horizon system worked and, therefore, they believed

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1 **MR JACOBS:** I just need to find out if I have any more
2 questions to ask. I may not, but Mr Stein and Enright
3 will tell me.

4 I haven't any more questions for you, thank you.

5 **SIR WYN WILLIAMS:** Thank you.

6 Mr Henry, can I invite you to take a break in your
7 questioning at some point which is convenient to your
8 line of questioning but which will give the stenographer
9 a bit of a breather?

10 **MR HENRY:** Of course, sir.

11 **Questioned by MR HENRY**

12 **MR HENRY:** Mr Parsons, on the contrary, I'm going to suggest
13 that you didn't make any mistakes at all and that what
14 you did -- I mean there were errors of judgement,
15 obviously, there were very serious departures from
16 standards that ought to have applied, but that what you
17 did was deliberate. It was clear sighted, it was
18 ruthless.

19 **A.** Sorry, are you asking me to comment on that?

20 **Q.** Yes.

21 **A.** I'm a lawyer acting for Post Office. As a lawyer, it's
22 my responsibility to defend their interests. For
23 a large part of my engagement by Post Office, my
24 instructions were that they considered the Horizon
25 system to be a reliable system and, therefore,

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1 they were in the right position but, at the same time,
2 the Mediation Scheme was set up, as much as I could see,
3 with a genuine attempt to understand the complaints of
4 the subpostmasters and, if possible, resolve them.

5 **Q.** Well, then why did you say -- and there's no need to go
6 to the email because it's already been canvassed by
7 Counsel to the Inquiry -- why did you say that you
8 didn't think there was any prospect of settling any of
9 the cases through the mediation?

10 **A.** As I explained yesterday, that email was set up -- was
11 sent before the scheme was fully developed and there was
12 an investigation phase built into it, and my expectation
13 at the point at which they built the investigation phase
14 in, is that may give rise to new information which may
15 cause Post Office to settle some cases. However,
16 I accept there was a large delta between the parties and
17 that makes it difficult to settle.

18 **Q.** But you say it was a view expressed before it was fully
19 set up and worked out but, when you look at the history
20 of the Mediation Scheme, it was a complete sham, wasn't
21 it?

22 **A.** I don't accept that for the --

23 **Q.** It ended in utter failure, didn't it?

24 **A.** I don't believe so. I think it did a lot of good work
25 investigating 150 cases and I don't have the statistics

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1 before me but, in a good number of cases, settlements
 2 were reached.

3 **Q.** I want to go back now, very briefly, to 9 September
 4 2013, and just help us, please. I don't quite
 5 understand your evidence. What are your memories of
 6 that consultation that took place at 2 Bedford Row?

7 **A.** I recall there was a consultation, I can recall being in
 8 2 Bedford Row chambers in the room but I can't really
 9 recall any of the details of what was discussed.

10 **Q.** Or is it that you don't want to, Mr Parsons?

11 **A.** I'm afraid it was a long time ago and I just can't
 12 recall the details.

13 **Q.** A long time ago, of course, but let's not forget the
 14 context. I mean, you were involved in arranging that
 15 consultation together with Mr Matthews, weren't you?

16 **A.** Primarily it was Mr Matthews but I accept that.

17 **Q.** Yes, and it was a very, very serious problem that you
 18 had because you had the coalescing of the Second Sight
 19 Interim Review and then the revelation, of course, of
 20 Gareth Jenkins and the Clarke Advice. You were made
 21 aware of the problems with Gareth Jenkins, you say, from
 22 about 8 July and you read the Clarke Advice on 17 July,
 23 correct?

24 **A.** Correct.

25 **Q.** Right. So there must have been quite a lot of

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1 going to be taking many notes!

2 Then there was Susan Crichton, she was General
 3 Counsel, rather too senior, perhaps.

4 There was Rodric Williams: was he scribbling?

5 **A.** My general recollection of Rod is he was someone who
 6 made notes. I can't recall if he was in that meeting.

7 **Q.** You would recognise his handwriting?

8 **A.** Maybe.

9 **Q.** Maybe. Mr Clarke was there, Mr Bowyer was there,
 10 Mr Smith was there. We know that Mr Smith was writing
 11 notes and then he typed them up. Your partner was
 12 there, Mr Matthews. You, however, were the senior
 13 associate, you would have been the deputed notetaker,
 14 wouldn't you?

15 **A.** I don't recall being asked to take notes in that
 16 conference. I haven't being able to locate any of my
 17 notes from that conference.

18 **Q.** You haven't?

19 **A.** We've had a look, I --

20 **Q.** What a shame. I wonder where they went to.

21 **SIR WYN WILLIAMS:** Well, hang on: he hasn't accepted that he
 22 made notes, Mr Henry.

23 **MR HENRY:** You've looked for you -- you say you've looked?

24 **A.** We've tried to locate my old notebooks.

25 **Q.** So would you have been doing it on to a computer or

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1 expectation and anticipation. I mean, "How is the great
 2 man, Mr Altman, going to get us out of this mess?" You
 3 must have been thinking like that. I mean, you did want
 4 to advance in your profession, didn't you?

5 **A.** As I've said before, I wasn't advising on the criminal
 6 side but it's fair to say I was interested to understand
 7 what Brian's advice was going to be.

8 **Q.** I'm sure you were interested, and why were you
 9 interested?

10 **A.** Because it was a serious issue.

11 **Q.** Yes, and that serious issue will have impacted with the
 12 civil cases that you were trying to keep at bay.

13 **A.** I didn't see it that way at the time, though I --

14 **Q.** You didn't?

15 **A.** -- though I recognised there was a crossover between
 16 subpostmasters who had been criminally convicted and the
 17 civil claims they might then subsequently bring --

18 **Q.** Are you really saying to the Chairman of this Inquiry
 19 that you didn't see it that way at the time?

20 **A.** It wasn't the way I was thinking about matters.

21 **Q.** Well, we'll come to that but let's just concentrate on
 22 who was there. Can I take it that you were the most
 23 junior person in the room?

24 **A.** Yes.

25 **Q.** Now, Mr Jarnail Singh was there, and I don't think he's

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1 would you have been actually writing it out?

2 **A.** I suspect, back at that time, I would have taken notes
 3 on paper.

4 **Q.** Right. I mean, it's not an invariable practice but
 5 often the most junior person in the room, the senior
 6 associate in your case, would be the notetaker because
 7 they're the least involved in the discussions and they
 8 are, more or less, observing events and so, therefore,
 9 they are there to take an assiduous note. Are you
 10 saying that you have no recollection of note taking?

11 **A.** I have no recollection of taking notes in that meeting.

12 **Q.** Right. I mean, obviously you would have wanted to have
 13 been diligent and you would have wanted to have
 14 impressed, wouldn't you?

15 **A.** Well, at that time, impressed who?

16 **Q.** Well, your partner and the other people in the room.
 17 I mean, you were a senior associate. Presumably, you
 18 had designs on partnership?

19 **A.** At the time, Gavin Matthews was the partner in the room.
 20 I knew him well and, as I explained, he was leading on
 21 that line of work.

22 **Q.** Right. Well, I want to come, please, to those notes
 23 because I'm going to suggest that the ones that were
 24 preserved by your firm were sanitised. You've already
 25 been taken to the point that there is no mention of

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1 shredding. Do you have no recollection of shredding
2 being mentioned?
3 **A.** No.
4 **Q.** There's no mention of "other Misras crawling out of the
5 woodwork". Do you remember an expression of that kind
6 being used by leading counsel?
7 **A.** I don't recall that.
8 **Q.** No. It's a rather unfortunate expression, isn't it?
9 **A.** I don't really have a view on it.
10 **Q.** You surely -- I mean, are you saying that you have no
11 recollection of that?
12 **A.** I have no recollection.
13 **Q.** No mention of a direct question post by your partner
14 Gavin Matthews, "Should we apologise to Seema Misra?"
15 and leading counsel saying, "I wouldn't"?
16 **A.** I don't recall that.
17 **Q.** And curiously at all, no mention at all whether, in the
18 circumstances, there should be prompt disclosure to
19 Mrs Misra of the discreditable conduct and breach of
20 court duties of Gareth Jenkins.
21 **A.** If that's what the minute says, that's what the minute
22 says, but I don't recall those discussions.
23 **Q.** No, I'm saying that there is no mention of it at all
24 and, surely, Mr Parsons, in a case where the Post Office
25 has relied upon Mr Jenkins as to the efficacy of the

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1 Mr Chris Aujard, and it was in connection with
2 Linklaters being approached, and the document I want to
3 put up is POL00006484. You're familiar with this
4 document?
5 **A.** I'm aware of it.
6 **Q.** You were aware of it enough to forward it to David
7 Oliver and Chris Aujard when they were considering the
8 appointment of Linklaters, and I suggest that this shows
9 what was really in the background all the time, which
10 dictated the actions that you and others, Mr Parsons --
11 because it's not just you -- that you and others took.
12 So I want to go to the second bullet point. It is
13 reported that leading counsel, Mr Morgan, said:
14 "The proposal to instruct an independent expert to
15 prepare a report on the Horizon system is the highest
16 risk response to the issue. What will it achieve? It
17 will not be able to address any of the civil/criminal
18 cases dealt with under 'Old Horizon' [so that would be
19 Legacy Horizon]. Will it seek to review particular
20 cases? If so, which ones?"
21 So immediately there, there is identified the
22 problem of pre-2010 cases; do you agree?
23 **A.** Correct, yes.
24 **Q.** Next bullet point:
25 "Whatever the findings of the expert report it will

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1 Horizon system, they would be bound to disclose material
2 which undermined his status as an expert witness,
3 wouldn't they?
4 **A.** That was a matter for the criminal lawyers to advise on.
5 **Q.** No, Mr Parsons. You're a lawyer. You were heavily
6 involved -- and we'll see how heavily you were involved
7 when I ask you further questions about this in the
8 instructions of Mr Altman -- and you had a brain.
9 I put it to you again: in a case where the Post
10 Office has relied on Mr Jenkins as to the efficacy of
11 the Horizon system, they were bound to disclose material
12 to Mrs Misra which undermined his status as an expert
13 witness?
14 **A.** That's what I understand the position to be from the
15 criminal lawyers.
16 **Q.** Yet there is no mention at all in the minutes, no
17 mention at all of that being discussed. Do you find
18 that odd?
19 **A.** Yes, I do find that odd, given that that was probably
20 the -- one of the key issues that was under review at
21 that point in time.
22 **Q.** Yes. Now, I want to come, please, to a document that
23 you sent under cover of an email which we don't need to
24 get up but, just for the sake of the record, it's
25 POL00021991, and you sent it to Mr David Oliver and

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1 not resolve the problem. [The Post Office] will be
2 'damned if they do and damned if they don't'. If the
3 findings are that there are no issues with Horizon
4 people will see that as a 'whitewash' whereas if the
5 findings are negative, that will open the floodgates to
6 damages claims by SPMs who were imprisoned for false
7 accounting and Access Legal will start to pursue all the
8 civil cases they are currently sitting on."
9 Now, can you just help us, please, who were Access
10 Legal; were they a funder?
11 **SIR WYN WILLIAMS:** No, I think they were Shoosmiths by
12 another name, weren't they?
13 **MR HENRY:** I'm very grateful, sir. Thank you.
14 So Shoosmiths, part of which Shoosmiths was one
15 firm, part of a conglomerate of solicitors' firms,
16 a network of solicitors firms; is that right?
17 **A.** That's my recollection, yes.
18 **Q.** Right. So if the findings are that there are no issues
19 with Horizon, it's a whitewash; whereas, if they're
20 negative, floodgates. That was a matter, as well, that
21 you were aware of, that there was a dam and, behind that
22 dam, there were hundreds, and hundreds, and hundreds,
23 perhaps, in fact, thousands of subpostmasters who were
24 the victim of unjust claims for compensation by the Post
25 Office in respect of fictitious losses, and a lesser

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1 number, but still in their hundreds, of people who had
 2 either been convicted or had been, through force of
 3 circumstance, forced to plead guilty to, as the example
 4 is given there, false accounting.

5 **A.** Just as a point of context, this note is from June 2012.
 6 I didn't become involved until nearly a year later.
 7 I don't recall when this note was first provided to me.
 8 As to your question, I think it was always known by
 9 people at the Post Office and the Legal Team that, if
 10 Horizon was found to be fundamentally flawed, that would
 11 lead to a large, wide range of legal liabilities.

12 **Q.** So whether you actually had personal knowledge of this
 13 note or not, it reflects, nevertheless, what would have
 14 been the concerns to of the Post Office and also the
 15 concerns of Gavin Matthews, who was handling the Post
 16 Office Account?

17 **A.** I think it's an almost natural consequence: if the IT
 18 system was found to be fundamentally flawed, there would
 19 be a wide range of legal liabilities.

20 **Q.** Yes. That's why I suggest you are part of the policy of
 21 keeping it all at bay. To put it in a nutshell: delay,
 22 deny, get rid of the judge, if you have to, but keep it
 23 all at bay. That was part of the policy that you signed
 24 up to, at Bond Dickinson.

25 **A.** I don't accept that. When I began in 2013, the

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1 "Very clear proof of technical defect in Horizon.
 2 "Risks
 3 "[The Post Office] should be slow to concede that
 4 Horizon has any technical faults."
 5 I thought you were saying they thought it was
 6 robust?

7 **A.** They believed at that time it was a reliable system. It
 8 had obviously, at that point in time, already disclosed
 9 the three known bugs, at that point in time. As
 10 I accepted yesterday, I think the bar that is set there,
 11 on reflection, is now too high.

12 **Q.** But look what you say, "to do so could open up the
 13 floodgates to a large number of claims". They must have
 14 been within your knowledge; you must have known that
 15 they were behind the damn.

16 **A.** As I said before, if -- it was always known to me, and
 17 I suspect others at Post Office, that, if there was
 18 found to be a fundamental problem in Horizon, that
 19 affected a large number of subpostmasters, then that
 20 would open them up to a large number of claims.

21 **Q.** Then, of course, you put it in terms like this: it would
 22 be almost impossible to reverse this position if
 23 conceded. I'm going to use the term "domino effect"; if
 24 the pin comes out of the grenade, then you can't predict
 25 where the shrapnel is going to end up?

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1 instructions I had is that Post Office believed the
 2 system was reliable. Second Sight had just concluded
 3 their Interim Review and found that there was no
 4 systemic problem. The basis on which we operated was
 5 that understanding. That understanding is obviously
 6 wrong but it wasn't understood to be wrong at the time.

7 **Q.** Now, do you remember, when I asked you to consider your
 8 mindset when you went to that consultation on
 9 9 September 2013 about whether you had concerns about
 10 floodgates and civil claims if criminal prosecutions
 11 were undone, and you said it wasn't operating in your
 12 mind at the time. There's no need to get it up but you
 13 do remember that, not that long after that, on 8 October
 14 2013, you made a presentation to the Sparrow Working
 15 Group, didn't you?

16 **A.** I may have done. If you can help me with --

17 **Q.** You were taken to it yesterday. If need be, if you'd
 18 like to see it again, we'll get it up on the screen.
 19 It's POL00022002, and it's page 14 of that document.
 20 Mr Blake took you to it and I think it's page 14. I do
 21 hope I'm right about that.

22 Yes. There it is:
 23 "Horizon inaccurately records data/transactions.
 24 "Recommended threshold of proof before offering
 25 a remedy.

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1 **A.** The concern at this time was that there was some
 2 underlying fault in Horizon that was causing a wide
 3 range of losses that could explain the subpostmasters'
 4 concerns. Now, we had no evidence of that at the time
 5 and that's what we were concerned to understand and
 6 that's what that's a reference to.

7 **Q.** Did you like Second Sight?

8 **A.** On a personal level, yes.

9 **Q.** Just help me with this because it may be that I've got
 10 the wrong end of the stick but could we go to
 11 POL00021686, and could we scroll down, I think it is.
 12 I always say scroll up but if we could scroll down.
 13 We've got 15 February 2016, you to Mr Bourke,
 14 Mr Underwood, Rodric Williams, copied Daniel Fawcett:
 15 "Patrick, Mark, Rodric
 16 "[For your information] below. Dan found this in the
 17 [Second Sight] emails. It looks like [Second Sight]
 18 feeding questions to Alan for use with MPs."
 19 If we scroll up, we can see that Mr Fawcett has got
 20 access to, for example, emails from Chris Holyoak to Ian
 21 Henderson, Ron Warrington; who is Daniel Fawcett?

22 **A.** He's one of the lawyers at Womble Bond Dickinson.

23 **Q.** Was he junior to you or of the same -- you were
 24 a managing associate at the time, I think?

25 **A.** Scroll up, please, so I can see the date. I would have

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1 still been a managing associate then. I think I was
 2 made up to partner on 1 May 2016.

3 **Q.** So how did you get hold of these Second Sight emails?
 4 **A.** At the end of the Mediation Scheme, Second Sight was
 5 asked to return all its emails to Post Office for
 6 safekeeping.

7 **Q.** Was there any confidentiality implied in the return?
 8 **A.** Not in --

9 **Q.** In other words, that they were, you know, returned but
 10 nevertheless remained confidential?
 11 **A.** I don't recall any.

12 **Q.** Right. So this is after they've left the scheme. What
 13 were you trying to do, accumulate dirt on them?
 14 **A.** No. It was just an observation I'd made to others at
 15 the Post Office. As I explained yesterday, one of the
 16 concerns I had about Second Sight is I felt that they
 17 were leaning too much in favour of the subpostmasters,
 18 and had lost some of their neutrality. I think
 19 I probably forwarded it because that email seems to be
 20 evidence of that point.

21 **Q.** Who instructed you to do this? I say "you", of course
 22 it was done by Mr Fawcett but you're forwarding his
 23 product. Who was instructing you to do this?
 24 **A.** Sorry, to review Second Sight's emails, do you mean?
 25 **Q.** Yes.

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1 we want to go to the next one. Yes.

2 Then there is an email from you, if we could keep on
 3 scrolling down, please -- further, please. I'm so
 4 sorry, I'm not finding the part. There is an email
 5 where you say that you "gently warned" Mr Ron
 6 Warmington. So if we could just go and see that. It's
 7 in the body of this email. It's page 2., yes. Thank
 8 you so much.

9 It's the penultimate paragraph:
 10 "Ron is going to write a response to Post Office
 11 along the above lines. I have gently warned [Ron
 12 Warmington] that he needs to be careful about anything
 13 he says in relation to criminal prosecutions as such
 14 comments are under heavy scrutiny and will have
 15 consequences.
 16 "... he is now more comfortable with how to handle
 17 the situation. Hopefully, [the Second Sight] letter
 18 will close down the issue."
 19 Can you help, please: who was heavily scrutinising
 20 Mr Warmington's comments about criminal prosecutions?
 21 **A.** I don't think it was specifically aimed at
 22 Mr Warmington's clients, he --
 23 **Q.** Well, then why did you "gently warn" him?
 24 **A.** So my recollection, and it is rather dim now, is that
 25 Mr Warmington had said at a meeting that he had material

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1 **A.** I can't recall the context here I'm just looking at the
 2 subject line, which says "POL DSARs -- SS Docs". If
 3 I remember, there was a period around 2015/2016, where
 4 Post Office received a lot of data subject access
 5 requests from subpostmasters, so it may have been they
 6 were being reviewed in that context.

7 **Q.** Well, let's go, please, now to POL00413924. We can see
 8 that the heading "Second Sight -- disclosure information
 9 to [the Post Office] on prosecutions", Mr Jarnail Singh
 10 forwards it. Could we scroll down, please, and could we
 11 scroll further down, please. Yes, there we are:
 12 "Andy
 13 "This was a formal request and needs to be dealt
 14 with formally by Second Sight. As [Mr Altman] advised
 15 it can then be reconsidered. If then Second Sight still
 16 feel uncomfortable dealing with our request for
 17 disclosure, we may ask them to provide a witness
 18 statement to clarify their position on disclosure."
 19 So this is trying to obtain information from Second
 20 Sight, is it?
 21 **A.** I believe the context to this is that, at a Working
 22 Group meeting, I think it was, Second Sight had
 23 indicated that they believed they had evidence that was
 24 relevant to prosecutions.
 25 **Q.** Yes. Can we just scroll up, please, or scroll down --

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1 that he thought was relevant to prosecutions. That had
 2 caused Post Office to respond to that and discuss
 3 whether they then needed to get access to that
 4 information, what they were going to do with the
 5 information if he did have it, et cetera, et cetera, but
 6 the output of this, actually, is Mr Warmington accepted
 7 he didn't have such information or at least he didn't
 8 have any new information.

9 And so the point of the conversation with Ron was
 10 that -- to say to him he needs to be careful of what he
 11 says because he'll set hares running on these points
 12 which causes a lot of work to be done, in this case,
 13 actually, for no purpose at all.

14 **Q.** Why didn't you say that? Why have you said instead
 15 "I gently warned him that he needs to be careful about
 16 anything he says in relation to criminal prosecutions as
 17 such comments are under heavy scrutiny and will have
 18 consequences"?
 19 **A.** I've given you my explanation for it, which is, if
 20 comments are made by people at this time that they
 21 believe they had material relevant to prosecutions, that
 22 was something Post Office was alive to and they needed
 23 to do something about.
 24 **Q.** At its most anodyne, this was an attempt to steer Second
 25 Sight away from their interest in criminal cases, the

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1 investigation of criminal cases and the prosecution of
 2 criminal cases, wasn't it?
 3 **A.** No, it wasn't.
 4 **Q.** At its worst, it has all of the appearances of a threat?
 5 **A.** No, it wasn't. I don't believe it was and I believe
 6 there is a letter, actually, from Second Sight at the
 7 end of this somewhere --
 8 **Q.** Was this is an attempt to close the lid on potential
 9 criminal appeals that might be caused by, to use the
 10 expression, "careless lips costs ships", or, you know,
 11 blurring out something which might then be used by
 12 a prospective criminal appellant?
 13 **A.** Not at all. In fact, I think it's the opposite.
 14 I think Post Office heard something in a meeting and
 15 acted diligently to figure out whether that was
 16 something of substance.
 17 **Q.** What about the hare that you said this could set
 18 running?
 19 **A.** In terms of work being done in this case for no purpose
 20 because I believe the output is that Ron decided he
 21 didn't actually have any material.
 22 **Q.** We saw that you're quite good at closing things down.
 23 I mean, for example -- no need to take you to it but
 24 Mr Blake took you yesterday to what you described as
 25 "high-level advice", which shut down the Lessons Learned

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1 **A.** I --
 2 **Q.** -- the ambit of his instructions?
 3 **A.** I recall there was a terms of reference and there was
 4 some discussion about them but, as I explained
 5 yesterday, I don't believe I had substantial involvement
 6 in them.
 7 **Q.** Well, I want to go, please, to POL00297951, and this is
 8 you to Mr Rodric Williams, copied to Mr Matthews,
 9 regarding Mr Altman:
 10 "... Brian looks like the right man for the job. In
 11 my view he was very impressive.
 12 "He's clearly undertaken this type of exercise
 13 before and is very live to the political dimension."
 14 Which was?
 15 **A.** At that time, Post Office was under pressure from
 16 a group of MPs following the publication of the Second
 17 Sight review.
 18 **Q.** And the Post Office must not fail?
 19 **A.** I don't recognise that comment.
 20 **Q.** "Big question -- is Brian's work private advice for [the
 21 Post Office] or an independent assessment of [the Post
 22 Office's] criminal law position? One for us all to
 23 think about."
 24 There, your partner -- when I say your partner, the
 25 partner above you because you hadn't yet been made

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1 Review, or, if it didn't shut it down, it diluted the
 2 Lessons Learned Review because you were concerned about
 3 proactive disclosure in criminal cases. You remember
 4 that, you were taken to it?
 5 **A.** I remember the document but I think it's important to
 6 remember that the instruction we had was to point out
 7 the risks. We weren't asked to give an opinion on
 8 whether it should go forward, hence why my email
 9 contains a series of negative statements and risks.
 10 **Q.** You also, I suggest, were quite astute in positioning
 11 Mr Altman so he did not feel it incumbent upon himself
 12 to point out a flagrant miscarriage of justice.
 13 **A.** I don't recall any such conversation with Mr Altman and,
 14 as I tried to explain yesterday, I don't believe I had
 15 substantial involvement in Mr Altman's terms of
 16 reference.
 17 **Q.** We saw yesterday, of course, Mr Matthews saying that
 18 Mr Altman should not opine on safety but wasn't there
 19 also a debate as to whether his advice should be private
 20 or public?
 21 **A.** I recall that as a topic that was discussed.
 22 **Q.** Wasn't there also some fudging about the fact that,
 23 although he was being instructed by Bond Dickinson,
 24 there was toing and froing as to establishing his terms
 25 of reference --

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1 a partner, had you?
 2 **A.** No, not at this time.
 3 **Q.** No. The partner above you is being copied. Then you
 4 say:
 5 "Short-term -- Brian is going to assist with the
 6 response to the CCRC."
 7 Would that be the holding response?
 8 **A.** I can't recall now where we were in the --
 9 **Q.** It must have been the holding response, mustn't it?
 10 **A.** It may well have been but, as I say, I can't recall the
 11 exact sequence of letters.
 12 **Q.** "Longer term -- we need to draw up some terms of
 13 reference for his work. Gavin and I will have a first
 14 stab at this and then circulate this to the team."
 15 Then could I ask you, please, could we go to
 16 POL00298123 and could we go to page 2. This is, of
 17 course, signed off by Gavin Matthews:
 18 "Our advice is:
 19 "[The Post Office] legal needs to disclose Brian
 20 Altman's interim review to [Cartwright King] and discuss
 21 it with them.
 22 "[Cartwright King] should be asked to respond in
 23 writing to the recommendations made at paragraph 24 and
 24 paragraph 15."
 25 Then this:

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1 "Bond Dickinson [that's you] should sit down with
2 Brian Altman to walk him through the spot review process
3 and the [Second Sight] Report so that he can understand
4 the impact of his review on the civil side."
5 Help us about that, Mr Parsons. What does that
6 mean?
7 **A.** I think Brian wanted to understand more about the Second
8 Sight Report and the spot review process. I don't
9 understand the comment at the end about the impact of
10 his review on the civil side.
11 **Q.** You don't understand that comment?
12 **A.** I can understand that, if any of the convictions were
13 found to be unsafe and overturned, it would have civil
14 liabilities for Post Office but I don't know what Gavin
15 had specifically in mind with that comment.
16 **Q.** It's all about the dam again, isn't it?
17 **A.** As I've accepted, my view at the time, and I believe
18 others at the time, accepted that, if Horizon was to be
19 found to be fundamentally flawed, it would give rise to
20 potential legal liabilities.
21 **Q.** It would only take one successful criminal appeal where
22 there was proper, candid disclosure, in accordance with
23 the law, and the whole dam would collapse, wouldn't it?
24 **A.** I don't recall thinking about things that way at the
25 time.

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1 (A short break)
2 (12.05 pm)
3 **SIR WYN WILLIAMS:** Ready when you are, Mr Henry.
4 **MR HENRY:** Thank you, sir.
5 Mr Parsons, solicitors have a fundamental duty to
6 act in a way that upholds justice, do they not?
7 **A.** Alongside a series of other ethical duties, correct.
8 **Q.** You don't suggest, by saying that, that that fundamental
9 principle is, as it were, subject or dependent upon the
10 other principles?
11 Let's reflect upon it: solicitors have a fundamental
12 duty to act in a way that upholds justice. Yes or no?
13 **A.** It is one of the duties. There are other duties as
14 well. I don't think those duties necessarily need to be
15 incompatible with one another.
16 **Q.** Now, just help me, please. Who was giving the advice in
17 relation to the redaction of Gareth Jenkins' name? Do
18 you say that was not your responsibility?
19 **A.** Are you talking about the Helen Rose Report?
20 **Q.** Yes.
21 **A.** No, I don't believe it was my responsibility. It was
22 redacted by Cartwright King.
23 **Q.** Anybody else?
24 **A.** Not as far as I am aware.
25 **Q.** Did you ever gather anything at all from Mr Altman about

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1 **Q.** But you don't understand, you say, so that Mr Altman can
2 understand the impact of his review on the civil side.
3 You tell the Chairman that you don't understand what "on
4 the civil side" means?
5 **A.** No, I think I've tried to explain that I understood
6 that, if a conviction was found to be unsafe, it would
7 give rise to civil liabilities. That's my general
8 understanding of the interrelation of those, of the
9 criminal side and the civil side. What I said is
10 I didn't understand what specifically Mr Matthews had in
11 mind when he drafted that sentence.
12 **Q.** I want to try and deal, please, with one, if the
13 shorthand writer, can cope with another ten minutes, I'm
14 very grateful, sir --
15 **SIR WYN WILLIAMS:** Well, hang on, Mr Henry. When you say
16 another ten minutes, does that mean you'll finish?
17 **MR HENRY:** No, sir, because I think I started at 11.20.
18 **SIR WYN WILLIAMS:** Sure, I think it was a little earlier but
19 never mind. I think, I'd prefer to take a break, if you
20 don't mind.
21 **MR HENRY:** Certainly, sir. Certainly.
22 **SIR WYN WILLIAMS:** We'll start again at 12.05, and then you
23 can keep going, so to speak, until about 1.40, 1.45.
24 **MR HENRY:** That's very kind of you, sir, thank you.
25 (11.50 am)

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1 what was to be done with Mrs Misra?
2 **A.** I don't recall Brian advising on anything specific with
3 Mrs Misra but that may simply be, because so much time
4 has passed, I can't recall it.
5 **Q.** We know he was advising on 9 September 2013 that she
6 should not be involved in the mediation process and the
7 reason for that was that it might give her a ground of
8 appeal, was it not?
9 **A.** I recall the criminal lawyers, both Cartwright King and
10 Brian, both voiced objections to subpostmasters with
11 convictions participating in the scheme.
12 **Q.** I'm talking about the actual name of Mrs Misra being
13 raised in that specific context, not just convicted
14 people but Mrs Misra herself. It's in the note.
15 **A.** It may be. I don't have it in front of me. I'm just
16 saying I can't recall that now.
17 **Q.** But you do recall -- well, you've already agreed with
18 Mr Blake. I won't need to go further.
19 What happens if a criminal lawyer is giving advice
20 which you don't understand or which you consider to be
21 wrong? That would surely put you under a duty to do
22 something about it, wouldn't it?
23 **A.** I -- if I had such awareness, I would, yes.
24 **Q.** You've already confirmed that you did have such
25 an awareness because you don't dissent from the

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1 proposition I put to you that, if the Post Office relied
 2 on Gareth Jenkins as a witness to convict any particular
 3 person, they would be bound to disclose material which
 4 undermined his status as an expert witness.

5 **A.** That was my understanding from the criminal lawyers,
 6 yes.

7 **Q.** Right. Okay. Well, I want to now deal with Mrs Misra
 8 particularly, and could we go to WBON0000746. This is
 9 you to Mr Williams, to Mr Pheasant and also to
 10 Mr Matthews:

11 "I think I've pinned down what happened with Misra.
 12 "This was a criminal case. We subsequently reviewed
 13 transcripts of the criminal proceedings to identify
 14 anything relevant to Horizon ...
 15 "[Attaches a memo, key findings].
 16 "3 tables with detailed cross-reference to the Misra
 17 court transcripts identifying all the relevant
 18 material."
 19 I omit words.
 20 "... having re-reviewed these documents, I can't see
 21 anything that looks like the 14 Bug, the 62 Bug or the
 22 Falkirk Bug. However, it does appear that the Misra
 23 case went through Horizon in detail."
 24 Can we now turn, please, to -- well, insofar as you
 25 can, by the 1 July, you got up to speed with Mrs Misra's

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1 **A.** But the rest of the document isn't in my firm's house
 2 style, so I can't now recall the provenance of the
 3 document.

4 **Q.** It's got a "4A" reference, which is exactly the same
 5 reference that was put on the "Horizon Risks" document
 6 which at one point you thought had gone to the Board and
 7 served the dual purpose of advising the Board and also
 8 notifying the insurers. So that's your firm's
 9 reference, isn't it?

10 **A.** It looks like my firm's reference.

11 **Q.** Right. So can we just go to page 2 of this document,
 12 please, paragraph 8, in brackets:
 13 "We believe [James Arbuthnot] may feel that any
 14 interim findings which disclose any issue with Horizon
 15 should result in past criminal prosecutions by Post
 16 Office Limited being reopened and overturned."
 17 Paragraph 19, on page 4, please. You're dealing
 18 with "The 2 Anomalies" there, the 62 branch,
 19 paragraph 20, page 5, the 14 branch, and then could we
 20 deal with paragraphs 30 to 32, please, on page 6. Now:
 21 "The Falkirk Anomaly was the subject of evidence in
 22 the 'Misra' criminal prosecution, where:
 23 "the defence expert asserted that its existence
 24 demonstrate that Horizon had faults which could cause
 25 losses, and therefore that possibility could not be

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1 case?

2 **A.** No. I think this was -- work was undertaken by
 3 an associate in the team, and it was undertaken to
 4 specifically look for references to bugs, and so it had
 5 a very narrow remit as per the instruction we had
 6 from --

7 **Q.** But look at the materials referred to, a memo of the key
 8 findings, three tables with detailed cross-references,
 9 et cetera, et cetera. I mean, you said at the outset,
 10 "I think I pinned down what happened with Misra".

11 **A.** Yes. Based on those documents, I would have read them
 12 at the time to identify the question we were being
 13 asked, which is was there any references to bugs? I do
 14 note and just want to correct there, "I can't see
 15 anything that looks like the Falkirk bug". I think the
 16 Falkirk bug was referred to in Misra and that was
 17 a mistake.

18 **Q.** Quite right. POL00111625, please. Can we make the
 19 bottom left-hand corner -- can we focus on the bottom
 20 left-hand corner. You drafted this, didn't you?

21 **A.** This document was provided to me at the start of today,
 22 so I've not had a chance to look into it. Though I note
 23 the bottom left-hand corner has a reference that looks
 24 like my firm's reference.

25 **Q.** Yes.

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1 excluded in Misra's case.

2 "The prosecution expert (Gareth Jenkins from
 3 Fujitsu) asserted that it could not have been
 4 responsible for the losses because its clearly visible
 5 events had not manifested themselves in the branch
 6 records, and that it had been fixed more than a year
 7 earlier.

8 "Misra pleaded guilty to false accounting, and was
 9 convicted by a jury of theft. To reach this verdict,
 10 the jury had to be satisfied that the charges were
 11 proved beyond all reasonable doubt. She was sentenced
 12 to 15 months' imprisonment. There has been no appeals
 13 against conviction."

14 Of course, anybody reading that and anybody
 15 preparing that document would realise that, in order for
 16 her to be convicted on theft, the jury would have had to
 17 have been satisfied, as it says, beyond all reasonable
 18 doubt; and who was the prosecution expert? Gareth
 19 Jenkins.

20 Now, you were aware, as you've already said today,
 21 from paragraph 87 of your witness statement, of the
 22 Gareth Jenkins problem from 8 July and you received the
 23 Clarke Advice on 17 July 2013 from Susan Crichton. You
 24 read this document, didn't you? Did you prepare it or
 25 were you part and parcel of preparing it?

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1 A. As I say, I haven't had a chance to investigate it
2 because I was only provided a copy this morning. It's
3 got our reference on it, which means it probably was
4 sent to us at some point in time at least. I can't now
5 recall whether -- what input I may have had into it or
6 not.
7 Q. Could investigations be made into who was the author of
8 that document; is that what you're saying?
9 A. It might be possible.
10 Q. Right. Well, Mr Parsons, Mrs Seema Misra and her
11 lawyers should have been provided with information of
12 Gareth Jenkins' misfeasance as soon as possible after
13 that misfeasance came to light, shouldn't they?
14 A. Looking back on it now, that seems -- that would be my
15 view but, at the time, that was being advised on by
16 Cartwright King and Brian Altman, and I followed their
17 advice.
18 Q. What about your fundamental duty to act in a way that
19 upholds justice?
20 A. At that time, I wasn't aware that there was any problem
21 with what -- the choices the criminal lawyers had made.
22 Q. Can we just focus upon that because, of course, you've
23 read the Clarke Advice, you are alerted to the problem,
24 at least a week before -- or slightly more than a week
25 before you read the Clarke Advice. Mr Jenkins,

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1 A. I haven't got it in front of me but I don't recall that
2 he was mentioned in it.
3 Q. You accept that, don't you, he's not mentioned at all?
4 A. That's right.
5 Q. That letter is indefensible because of that omission,
6 isn't it?
7 A. No --
8 Q. It gives false reassurance to the CCRC?
9 A. At that time, it was just intended with a holding letter
10 with an intention that further correspondence would
11 follow about these issues.
12 Q. The omissions -- and I've no need to repeat them, you've
13 accepted what they are -- the omissions are
14 indefensible, aren't they?
15 A. Which omission are you referring to, Mr --
16 Q. Well, that Gareth Jenkins was in breach of his duty to
17 the court, that "Oh, by the way we know he gave evidence
18 orally and in writing in numerous cases, which is said
19 to be misleading and he hasn't acted in accordance with
20 his obligations mandated by law, and the Criminal
21 Procedure Rules, Rule 19. Instead we've appointed Brian
22 Altman in relation to the Second Sight Interim Review",
23 and you continue to trade off Brian Altman's reputation
24 going forward as well, don't you?
25 A. That isn't how I recall the events. My recollection is

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1 an unreliable witness, correct?
2 A. Correct.
3 Q. Post Office could no longer call him because his
4 credibility was shot, correct?
5 A. Correct.
6 Q. Failed in his duties to the court?
7 A. That was the advice from the criminal lawyers.
8 Q. Said to have given false or misleading evidence in the
9 cases in which he was involved?
10 A. Again, that's from the advice from the criminal lawyers.
11 Q. And you knew he had given oral evidence against
12 Mrs Misra?
13 A. I did.
14 Q. Right. Isn't it obvious that the substance of the
15 Clarke Advice, the facts which were not cloaked in
16 privilege, should have been stated clearly to the CCRC
17 in the holding letter you drafted?
18 A. At that time, I was just drafting a holding letter
19 whilst Post Office sought advice from their criminal
20 lawyers.
21 Q. It seems, however, in that holding letter, that the Post
22 Office is trading on Brian Altman, all in the context of
23 the Second Sight Interim Review, but the tainted
24 witness, the unsafe witness that gave evidence against
25 Seema Misra isn't mentioned in that CCRC letter at all.

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1 that Post Office was seriously concerned about the
2 Clarke Advice and Gareth Jenkins' past testimony. That
3 is why they instructed Brian Altman, to give them a view
4 that they were doing the right things in response to
5 that situation.
6 Q. They were seriously concerned because the facts are
7 dealt with in the Clarke Advice and the Clarke Advice
8 itself is the pin in the grenade and they wanted to keep
9 the pin in the grenade, rather than the grenade going
10 off; that's the truth, isn't it?
11 A. Not as far as -- not that I can recall at that time but
12 I wasn't sighted on the decisions that were made on who
13 should get what disclosure and what disclosure should be
14 given.
15 Q. Well, you actually are concerned sometimes in cases and
16 you actually query Mr Clarke -- we'll come to it if
17 necessary -- and say, "Well, shouldn't this be given?"
18 A. I saw that as the role of Cartwright King under the
19 supervision of Brian Altman.
20 Q. Right. Advice is given, and you give this advice, that
21 the report -- that's Mr Altman's general review -- gives
22 good grounds to resist any formal external review of the
23 Post Office's historic prosecutions, ie by the CCRC --
24 that document is POL00123004, I don't need to take you
25 to it -- but no one is mentioning Seema Misra, are they?

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1 **A.** Do you mean in that particular document?
 2 **Q.** Yes.
 3 **A.** I don't recall her being mentioned in that document.
 4 **Q.** No. Again, an indefensible position. The advice is
 5 given that the report gives good grounds to resist any
 6 formal, external review, yet all of that rotteness, all
 7 of that taint in relation to the architect of the system
 8 and the expert that the Post Office had used is
 9 airbrushed from the picture. It's deliberate, isn't it?
 10 **A.** No, not as far as I can recall. My understanding was
 11 that Post Office thought that, if Cartwright King were
 12 to make the correct disclosures in the cases having
 13 undertaken their review and that Brian Altman had
 14 reviewed that process and agreed that it was a sound
 15 process, and that was information -- information was
 16 provided to the CCRC, the CCRC may then decide that they
 17 don't need to undertake their own investigation. And,
 18 of course, Brian Altman's advice was provided to the
 19 CCRC, admittedly later, but at the beginning of 2015.
 20 **Q.** What you're getting, in fact, is layer upon layer of
 21 external lawyers giving the vestige of respectability
 22 but, at the heart of it, buried underneath all of this,
 23 is the fact that an obvious disclosure decision, to
 24 disclose to Mrs Misra's lawyers, is never taken so far
 25 as Gareth Jenkins' misfeasance?

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1 case, as in there could be many of them but it might
 2 undermine them.
 3 **Q.** But he did give evidence orally in only one case but
 4 let's contrast that, because the contrast is even more
 5 pronounced, if we go to POL00040026, and this is the
 6 draft which you said was I think unacceptable because it
 7 was apparently misleading. Could we go to the same
 8 section, "Prosecution", please.

9 Yes. There, "Prosecutions & Convictions", second
 10 paragraph:

11 "Post Office has an obligation to consider whether
 12 further discourse [it should be disclosure] should be
 13 made to defendants. It is of concern to Post Office
 14 that the expert evidence of one prosecution witness,
 15 Dr Gareth Jenkins of Fujitsu, may have failed to
 16 disclose certain problems in the Horizon system
 17 potentially relevant to a case."

18 There can be no doubt there: that is singular and
 19 that is referring, is it not, to Seema Misra?

20 **A.** It definitely seems to be singular. I don't know what
 21 it was referring to because I think it appears that
 22 those amendments were made by the either Rodric Williams
 23 or Cartwright King.

24 **Q.** Yes, and that's clear, because it has been done, and
 25 there's no need for me to take you to it, but I'll give

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1 **A.** That appears to have been the case but, as I say,
 2 I wasn't involved in that decision at that time.
 3 **Q.** I want to come very briefly to the comparison of your
 4 "Horizon Risks" document and the document that Mr Rodric
 5 Williams was involved in. If we can get up your
 6 document, which is POL00021996, and if we could go to
 7 the prosecution risks chapter or section, please, the
 8 second page. "Prosecutions & convictions", and we'll
 9 take it as read that that second paragraph, "In
 10 particular, the expert evidence ... Dr Gareth Jenkins of
 11 Fujitsu", and we can see that there is, in the last
 12 sentence:

13 "... may have undermined a prosecution case or
 14 assisted with an accused's defence."

15 Forgive me, sir, I'm just looking at a reference.
 16 Right.

17 Do you see there, even you have put "a prosecution
 18 case":

19 "... may have undermined a prosecution case ..."

20 **A.** Yes, I can see those words.

21 **Q.** Singular. That's a reference to Seema Misra, isn't it?

22 **A.** I don't believe so. I think you're reading it
 23 differently to the way I'm reading it. I don't think
 24 I'm reading that as there has been a single prosecution
 25 case, as opposed to it could undermine a prosecution

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1 the reference for the transcript, POL00040025. That was
 2 done after amendments by Rodric Williams and Cartwright
 3 King.

4 But, paradoxically, although it would have appeared
 5 to have been misleading, it made it clearer that that
 6 one case must refer to the only case in which Mr Jenkins
 7 gave oral evidence: the case of Seema Misra?

8 **A.** It seems a fair possibility but I don't know for
 9 certain.

10 **Q.** It does. Now, Cartwright King -- clearly an appeal is
 11 on the cards because the amendment is 26 August 2013.
 12 That's the email back to you, which says, "This has been
 13 done with amendments by me and Cartwright King".

14 So that suggests that there may be an appeal in the
 15 offing, hence the disclosure to the insurers.

16 5 October, there's a document drafted by Cartwright King
 17 that she was due to receive disclosure, Mrs Misra, that
 18 disclosure ought to be given to her. But then we have
 19 to fast forward to January 2014 and a decision is made
 20 that she isn't to get disclosure.

21 Do you have anything to say about that?

22 **A.** I was unaware as to the decisions made in relation to
 23 individual cases as to who got disclosure and who
 24 didn't.

25 **Q.** I suggest that 21 October could be a key date in

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1 understanding this. No need to get it up on screen but
 2 you were taken it to yesterday and Counsel to the
 3 Inquiry, Mr Blake, linked two documents. One was
 4 POL00372551, which was Ms Vennells to Alice Perkins,
 5 talking about the unsafe witness, and then there's
 6 another one, you writing to Andy Holt, Gavin Matthews,
 7 Belinda Cortes-Martin and Jarnail Singh, and it's
 8 POL00123004, and perhaps we should get that up on the
 9 screen, please. Could we scroll up, please.

10 This is from you -- and scroll up -- scroll down,
 11 sorry -- and scroll up. Yes:

12 "Brian Altman's ... First Review has now been
 13 received."

14 Again, no mention. It's the same day as Ms Vennells
 15 talks about the unsafe witness but no mention at all by
 16 you of the Gareth Jenkins problem, is there?

17 **A.** No, at that time I presume that everybody receiving this
 18 would have been aware of the Gareth Jenkins problem
 19 because it had been raised some months before.

20 **Q.** But it's always a sensible idea, in considering this
 21 whole issue, about whether there are good grounds to
 22 resist any formal external review of its historic
 23 prosecutions, to mention one thing which eminently
 24 qualifies for investigation and review by the CCRC,
 25 which would be the Clarke Advice.

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1 the grounds that Horizon was not a reliable system would
 2 have been seriously damaging for Post Office.

3 **Q.** In fact, the very document that caused Mr Justice Fraser
 4 so much concern, a Fujitsu document which talked about
 5 the receipts and payments mismatch bug and the insertion
 6 of data, Solution One, Solution Two, Solution Three,
 7 which ought to have been disclosed in Mrs Misra's trial,
 8 I mean, it would have made it incredibly difficult to
 9 defend the Horizon Issues trial, wouldn't it, as well?

10 **A.** If it's -- if we're thinking about the same document
 11 I understood that document had been provided to Second
 12 Sight, I believe, if we're talking about the same
 13 document. So the document was out there with them to
 14 investigate at the time, yes, if it was the document I'm
 15 thinking about, then it was referred to in the Horizon
 16 trial.

17 **Q.** So what I'm going to suggest instead, this is my last
 18 topic and I've got a quarter of an hour, is that,
 19 instead, a rationale for limited disclosure was devised,
 20 namely the provision of the Helen Rose Report, because
 21 it potentially revealed Mr Jenkins to be unreliable
 22 based on his knowledge of system errors, which he did
 23 not reveal, and you knew that, of course, because you'd
 24 read the Altman general review, hadn't you?

25 **A.** I was aware of the problems with Gareth Jenkins'

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1 **A.** As I said, I assume that the recipients of this would
 2 have all have been sighted on the original issue that
 3 was raised in the Clarke Advice.

4 **Q.** Now, you're familiar with the issues, you've already
 5 given evidence about them, but, if Mrs Misra had had
 6 prompt disclosure, she would have had an unstoppable
 7 appeal and her appeal would have exploded not only
 8 Mr Jenkins but also the Post Office's management of
 9 Mr Jenkins, wouldn't it?

10 **A.** I can't comment on how her appeal may have gone but it
 11 seems to me that she would have had grounds to appeal
 12 and that would have had -- and, had she been successful
 13 in that appeal, it would have had serious knock-on
 14 consequences for Post Office.

15 **Q.** We take the terms of the Inquiry, of course, by
 16 reference to the Horizon Common Issues, the Horizon
 17 Issues and also the Hamilton appeals. But it would have
 18 also blown up remote access because of material
 19 non-disclosure of documents known to the Post Office in
 20 2010, in relation to remote access and insertions of
 21 data to resolve the receipts and payments mismatch bug,
 22 which ought to have been disclosed to her as well. So
 23 it would have been catastrophic for the Post Office,
 24 haven't it?

25 **A.** An appeal -- a successful appeal against a conviction on

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1 evidence.

2 **Q.** Yes, and I'm going to give the reference -- no need to
 3 take you to it, but it's POL00006803 at page 54 --
 4 because in the Altman general review, there is
 5 a reference to that and how the Helen Rose Report might
 6 have a potential for an impact on Gareth Jenkins'
 7 credibility.

8 Now, in paragraph 183 of your statement, you relate
 9 a conversation you had with Mr Simon Clarke -- whether
 10 the conversation was oral or in writing I don't think is
 11 clear -- but paragraph 183 of your statement at
 12 page 110, I'm just going to quote the last sentence:

13 "He [Mr Clarke] explained that the reason for
 14 disclosing the Helen Rose Report was its potential to
 15 impugn Gareth Jenkins' credibility as a witness and the
 16 appendix did not speak to that issue."

17 Do you remember that?

18 **A.** Yes.

19 **Q.** So can I now come, please, to POL00029707. This, you'll
 20 remember, is an email that you write to Belinda Crowe --
 21 Belinda Cortes-Martin -- as is now, and could we scroll
 22 up to a paragraph which has contained within it -- yes,
 23 see that paragraph:

24 "Just for background information, the material part
 25 of the Helen Rose Report has nothing to do with her

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1 comments about reversal data."
 2 Then I omit words:
 3 "The concern was not with the data's accuracy but
 4 that the presentation of the data could be misleading if
 5 its limitation were not fully understood. Putting this
 6 issue aside, the real (and confidential) reason that the
 7 report was disclosed was because Helen's comment at the
 8 bottom of page 3 suggests that it was widely known that
 9 there were problems with Horizon. This statement
 10 (regardless of whether it is correct) could have been
 11 used to attack Gareth Jenkins' credibility as
 12 [a] Horizon expert as he had previously stated that
 13 there were no problems with Horizon."

14 Now, I've already referred you back to the general
 15 review by Mr Altman, where he said, at the page
 16 reference I've given, quotation:

17 "The Helen Rose Report adds very little [or at least
 18 so it seemed to him] other than to point to a particular
 19 issue at Lepton and the implication from the report is
 20 that, as early as February 2013, Gareth Jenkins was
 21 aware of integrity issues with Horizon, none of which he
 22 revealed."

23 Can I ask you this: did Mr Altman tell you that the
 24 real and confidential reason for disclosure was that it
 25 might permit an elliptical attack on Gareth Jenkins'

1 the Gareth Jenkins document.
 2 **Q.** Right. So I want to go now to one of the documents that
 3 you refer to in footnotes, which is WBON0000834. This
 4 what he's saying to you:

5 "This is the first I've seen of an appendix so it
 6 did not go out with the disclosure pack. Nevertheless
 7 my opinion (and) advice is unchanged. This was a data
 8 presentation issue, not a Horizon failure -- see last
 9 question and answer and a recommend in main report.
 10 Thus the disclosure issue remains that relating to the
 11 credibility of [Gareth Jenkins] as a witness only. I do
 12 not see that the appendix is disclosable in the criminal
 13 arena: it adds nothing to the credibility issue [of
 14 Gareth Jenkins] and cannot therefore meet the test for
 15 disclosure. Hope this helps."

16 So it follows from that, out of his own mouth, that
 17 Mr Clarke knew the reason to disclose was that it
 18 revealed the Gareth Jenkins credibility issue?

19 **A.** Correct.
 20 **Q.** Not just the problems with Horizon that need to be
 21 disclosed about bugs but also Mr Jenkins' knowledge of
 22 them and his failure to reveal them before ordering
 23 trials: in other words, the classic unsafe witness
 24 point.

25 **A.** Correct, there was a credibility issue with Gareth

1 credibility?
 2 **A.** I can't recall if it was Brian Altman that had told me
 3 that but I understood that was the concern with the
 4 Helen Rose Report.
 5 **Q.** That concern was a concern that was shared, it's
 6 obvious, because Mr Altman has written what he's
 7 written, but it's a concern, you say, that is shared
 8 among the criminal lawyers.
 9 **A.** Yes.
 10 **Q.** Right. So, in other words, the widely known problems
 11 with Horizon could therefore be used to attack his
 12 credibility because he'd stated previously, Mr Jenkins,
 13 that there were none. Correct?
 14 **A.** Yes, as I described it there, page 3 suggests there were
 15 widely known problems.
 16 **Q.** Right. Now Simon Clarke, Mr Clarke, based on your
 17 statement, he thought that credibility was the real
 18 reason to disclose, didn't he?
 19 **A.** I believe that was the case. I can't --
 20 **Q.** You checked it with him the day after your email of
 21 8 April. On 9 April, you footnoted -- in fact, you
 22 footnote 127 and 128 of paragraph 183. They are your
 23 email to him about it, and his email to you.
 24 **A.** Yeah, I recall around this time I spoke to Simon about
 25 these issues and the redactions that had been made in

1 Jenkins' evidence.
 2 **Q.** Right, and it seems that Mr Altman appreciated the same
 3 point, given what I've taken you to from his general
 4 review?
 5 **A.** Agreed.
 6 **Q.** But it seems -- and you of course, as an intelligent
 7 observer, apprised of the issues, it seemed that neither
 8 of them were going the whole hog, as it were, neither
 9 were following the logic inevitably demanded -- that
 10 logic inevitably demanded that character and credit is
 11 indivisible and Mr Jenkins' failure to disclose the
 12 existence of bugs was inseparable from his failure to
 13 act in accordance with his duties as an expert. You
 14 must have realised this?
 15 **A.** I was aware of those issues, yes.
 16 **Q.** Did it not strike you as extraordinary that these two
 17 experienced criminal lawyers were, as it were, dancing
 18 around the elephant in the room?

19 **A.** It didn't at the time, no.
 20 **SIR WYN WILLIAMS:** Is that it, Mr Henry?
 21 **MR HENRY:** I think that is it, sir.
 22 **SIR WYN WILLIAMS:** Thank you.
 23 Ms Dobbin?

Questioned by MS DOBBIN

25 **MS DOBBIN:** Thank you, sir. Mr Parsons, can you see me?

1 A. Yes, I can.
 2 Q. I represent Gareth Jenkins, my name is Clair Dobbin.
 3 I wanted to ask you about two things, if I may, and
 4 the first thing is something, in fact, that my learned
 5 friend, Mr Henry, has already touched upon. So I'm not
 6 going to go back to this document but you'll recollect,
 7 at the outset, he took you to an email of the 1 July
 8 2013, that you wrote. Do you recollect that?
 9 A. No, I'm afraid -- would you mind putting it up? Sorry.
 10 Q. Of course I will. It's WBON0000746.
 11 A. Thank you.
 12 Q. So I think we can see, can't we, from this email,
 13 Mr Parsons, that some work had been undertaken by your
 14 firm, I think they had prepared some notes of the trial
 15 of Mrs Seema Misra; is that correct?
 16 A. Yes, but specifically targeting one question, which is
 17 whether there was something in the transcripts that
 18 referred to specific bugs in Horizon.
 19 Q. Yes. You had reviewed those notes and, as you've set
 20 out there, you couldn't see anything that looked like
 21 the 14 bug, the 62 bug, or the Falkirk bug, correct?
 22 A. That's what it says there but, as I accepted earlier,
 23 that was wrong because I think it does refer to the
 24 Falkirk bug.
 25 Q. Yes, quite so. In fact, I think Mr Jenkins and a number

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1 you recollect that?
 2 A. That's -- that's my understanding.
 3 Q. I just wanted to ask you about this 62 bug, which
 4 Mr Henry has also touched upon. I wanted to ask you
 5 this: at the time you were speaking to Post Office about
 6 this, did anyone mention to you or explain that
 7 Mr Wilson, one of the prosecutors of Post Office, had,
 8 in fact, made a decision that notes relating to that bug
 9 shouldn't be disclosed to Mrs Misra at her trial?
 10 A. I don't believe anybody told me that.
 11 Q. Did you ever speak at all -- again when you were doing
 12 this work for Post Office and asking questions or trying
 13 to ascertain what had been known at this time -- did you
 14 ever speak to Mr Singh about what he knew, given the
 15 role -- or given that he was the prosecutor, in fact, in
 16 a number of cases?
 17 A. I don't recall when I first spoke to Mr Singh. It may
 18 have been after this. I don't recall asking Mr Singh
 19 any questions about his state of knowledge.
 20 Q. Did he ever volunteer any information to you about what,
 21 in fact, Mr Jenkins -- or information that Mr Jenkins
 22 had provided to him in the course of Mrs Seema Misra's
 23 trial --
 24 A. I don't believe --
 25 Q. -- or the proceedings?

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1 of questions, didn't he, about the Callendar Square bug?
 2 A. I can't recall now. I haven't looked at those memos for
 3 a long time.
 4 Q. All right. But have you actually been through the
 5 transcripts of the Misra trial?
 6 A. No, I'll have only read the memo that was provided by my
 7 team.
 8 Q. Right. So to be clear about this, this email of 1 July
 9 is based upon a misreading of the memos that were
 10 prepared for you; is that right?
 11 A. Correct.
 12 Q. And you have never gone back and examined the
 13 transcripts of the trial of Mrs Seema Misra?
 14 A. I don't believe I've ever read the transcripts of Seema
 15 Misra's trial.
 16 Q. Right. Well, Mr Parsons, I won't you any questions,
 17 then, about those transcripts.
 18 But then, just in terms of the other bugs, I think
 19 it's right, isn't it, the 14 bug, I think you probably
 20 now know, after the civil proceedings, that's a bug that
 21 came to light at a later point, correct, the suspense
 22 account bug?
 23 A. Yes, this would have been around -- this is around
 24 2011/2012, I think.
 25 Q. Yes, and I think came to Fujitsu's notice in 2013. Do

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1 A. I don't believe so.
 2 Q. Another question that I wanted to ask you, related to
 3 this, is that the Inquiry has seen evidence that, in and
 4 around September 2013, a lawyer from Cartwright King and
 5 a lawyer from the Post Office appeared to understand
 6 that there was a serious issue as to whether or not
 7 Mr Jenkins had ever been instructed as an expert.
 8 Again, was that information that was ever brought to
 9 your attention at the time by them?
 10 A. I only first heard of that issue in the course of this
 11 Inquiry.
 12 Q. It appears that your firm had recommended the
 13 instruction of leading counsel in relation to the review
 14 of the prosecutions because there was the concern that
 15 there might be a conflict with Cartwright King; is that
 16 correct?
 17 A. I recall there being a concern over the conflict with
 18 Cartwright King.
 19 Q. Do you think, then, that it was -- ought that
 20 information, information that they knew in 2013, that
 21 there was a serious issue as to whether or not
 22 Mr Jenkins had been instructed as an expert, ought that
 23 information not have been brought to your attention,
 24 given the reason or the rationale for the instruction of
 25 leading counsel?

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1 A. I think it's important to understand the nature of my
2 firm's role --

3 Q. Yes.

4 A. -- which was to act, as I said yesterday, as a conduit
5 to Brian Altman. The scope of information that
6 Mr Altman then needed to do his job was left to
7 Mr Altman to inform us, actually, as to what information
8 he needed.

9 Q. Yes. That's information that would be difficult for
10 Mr Altman to know, that information, unless someone
11 volunteered it to him. Correct?

12 A. I guess so, though I wonder whether, if Mr Altman had
13 asked certain questions, that information would have
14 been brought to light.

15 Q. All right, Mr Parsons, this isn't a criticism of you;
16 I'm just trying to understand, given your concerns or
17 your firm's concerns, about potential conflict related
18 to Cartwright King's conduct of prosecutions and their
19 understanding that there was a serious question as to
20 whether Mr Jenkins had been instructed as an expert,
21 again, whether you think that that is information that
22 ought to have been brought to your attention at the
23 time?

24 A. Looking back now, it seems like it's information that
25 should have been but I'm very cautious about the phrase

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1 related to the civil proceedings.

2 I'm not going to go back to your witness statement,
3 Mr Parsons, to cover this. I wanted to see if I could
4 just do it without having to do that. I think that you
5 suggest that there was the concern about using
6 Mr Jenkins as a source of information in the civil
7 proceedings, correct?

8 A. There was a concern about using him as a witness in the
9 proceedings and, related to that, there was then doubts
10 over the information that we were getting from Gareth
11 Jenkins, but we still, nevertheless, spoke to him and
12 sought his opinion on certain points.

13 Q. All right. I wanted to ask you this: can you point us
14 to any communications, for example, emails or written
15 correspondence, with Fujitsu in which you set out any
16 direction or instruction about the approach that they
17 were to take to Mr Jenkins, or the use that was to be
18 made of Mr Jenkins in providing information in the civil
19 proceedings?

20 A. I can't recall any such email at the moment.

21 Q. Was there such an email, Mr Parsons?

22 A. The best of my recollection is no but there was,
23 obviously, a lot of correspondence around that time so
24 I couldn't state definitively.

25 Q. Right. So is it the position, Mr Parsons, that, despite

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1 "brought to my attention" because, as I say, we were --
2 our role was to make sure the information was flowed
3 through to Brian Altman and for Brian to make requests
4 for what information he needed.

5 Q. Well, let me broaden it out, then. It's right, isn't
6 it, that that is information that ought to have been
7 brought to Mr Altman's attention at that time?

8 A. It strikes me that that's -- that would be useful
9 information for Mr Altman to have known.

10 Q. Yes, it's useful because, I think -- to use Mr Henry's
11 turn of phrase -- it would have opened up questions,
12 wouldn't it, about Post Office's management, to use his
13 term, of Mr Jenkins -- correct --

14 A. Yes, I can see that line of inquiry.

15 Q. -- and may, indeed, have opened up wider questions as to
16 Post Office's ability to conduct prosecutions as well;
17 do you agree?

18 A. I'm not sure I am able to answer that second question as
19 to what Post Office might do with future prosecutions.

20 Q. Sorry, it was badly put by me. It might open up
21 questions as to the competency with which Post Office
22 had been prosecuting cases; do you agree?

23 A. Yes, if Mr Jenkins had been improperly instructed.

24 Q. Yes, all right. I'm going to be move on and ask you
25 about a completely separate topic, if I may, and that's

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1 this concern or caution around using Mr Jenkins, that
2 was not, in fact, something that was communicated to
3 Fujitsu?

4 A. It -- I don't -- it wasn't communicated by me to
5 Fujitsu. I don't know if somebody else had communicated
6 it from Post Office to Fujitsu. But I was operating on
7 the understanding that Fujitsu were unaware of the
8 concerns we had about Gareth Jenkins' evidence.

9 Q. I was just looking at the transcript because I wanted to
10 make sure I hadn't misheard you. Fujitsu were unaware
11 of the concerns about Mr Jenkins' evidence; is that
12 correct?

13 A. I'm saying that was my understanding at the time.

14 Q. Yes. You are the key person, Mr Parsons, aren't you, in
15 terms of the conduct of the civil litigation?

16 A. Yes, I think that's fair, alongside leading counsel.

17 Q. Yes, and it follows from all of that, doesn't it,
18 Mr Parsons, that Mr Jenkins didn't know the position
19 that he was being put in in the civil litigation either?

20 A. I can't talk to Mr Jenkins' state of knowledge.

21 Q. Well, he didn't know, did he, because you didn't
22 communicate it to Fujitsu, that he wasn't being used as
23 a witness because of these historic concerns about the
24 evidence that he had given previously or the criticisms
25 that had been made of him?

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1 **A.** I think -- as I say, I can't speak to Gareth Jenkins'
 2 knowledge but, as far as I was aware, he was not aware,
 3 if I can put it that way.
 4 **Q.** Can I just ask: how could you have let that situation
 5 arise, Mr Parsons, whereby you were making use of
 6 someone as a source of information in the civil
 7 proceedings and yet, all the while, not telling them
 8 that they had been subject to this previous criticism
 9 and, in fact, that was the reason why they weren't being
 10 used as a witness?
 11 **A.** So, as I explained in my statement, it was a less than
 12 ideal situation. In fact, it was a very difficult
 13 situation. Our expectation, until much later in the
 14 Group Litigation, is that we wouldn't need to rely on
 15 Gareth Jenkins. We thought we'd be able to get the
 16 evidence from Torstein Godeseth or some others at
 17 Fujitsu. I was aware there was always a concern that
 18 there would be points on which only Gareth may be able
 19 to give evidence, but until the issues in the litigation
 20 took shape, around the Horizon issues, that is, that
 21 only really took shape around, I think it was, August
 22 '18, so quite deep into the litigation, the point around
 23 Gareth Jenkins' role and his role as a witness hadn't
 24 taken -- hadn't really taken hold until that point in
 25 time.

1 **Q.** But do you see the position that you were putting him in
 2 but without him knowing anything about the reality of
 3 his situation?
 4 **A.** I think we were speaking to Gareth as a source of
 5 information and, given that we had decided not to call
 6 him as a witness, I didn't see there was a challenge
 7 with that.
 8 **Q.** But you didn't see that you were potentially exposing
 9 him or putting him in a difficult position by doing
 10 that, given, for example, you know, whenever witnesses
 11 said that they had spoken to him about something,
 12 whenever they came to give evidence, can you not see
 13 that that's putting someone in a difficult position?
 14 **A.** I'm not sure what difficulties you are envisaging here.
 15 We were asking Gareth questions, he was, I'm sure to the
 16 best of his availability answering those questions.
 17 I don't see asking someone questions and getting answers
 18 puts them in a spot of difficulty.
 19 **Q.** You don't see a difficulty in using someone in
 20 litigation, in making a decision not to call them as
 21 a witness, in deciding that you need to be very cautious
 22 and careful about how you're using them, and yet not
 23 tell that person that that's the position they're in;
 24 you don't see a problem with that?
 25 **A.** There's several difficulties but they're mainly for Post

1 Office to manage in the litigation process but I -- that
 2 idea did not cross my mind whilst we were in the
 3 litigation.
 4 **MS DOBBIN:** Yes. Thank you, Mr Parsons.
 5 **SIR WYN WILLIAMS:** Is that it, Mr Blake?
 6 **MR BLAKE:** I believe that is, sir. Yes.
 7 **SIR WYN WILLIAMS:** All right.
 8 Well, thank you very much, Mr Parsons, for your very
 9 detailed witness statement and for answering questions
 10 posed to you by a number of people over a day and a half
 11 at this Inquiry. I'm grateful to you.
 12 So we'll stop now and adjourn until Tuesday morning,
 13 when we'll hear from Mr Henderson, I believe.
 14 **MR BLAKE:** That's correct, sir.
 15 **SIR WYN WILLIAMS:** All right. Thank you all very much.
 16 **MR BLAKE:** Thank you very much.

17 (12.56 pm)

(The hearing adjourned until 9.45 am
on Tuesday 18 June 2024)

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