

Witness Name: Ronald John Warmington

Statement No.: WITN01050100

Dated: 20 May 2024

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF RONALD JOHN WARMINGTON

I, Ronald John Warmington, will say as follows:

INTRODUCTION

1. I am currently a Director, and the Chairman, of Second Sight Investigations Ltd ('SSIL') and I have also served as a Director, since 1 April 2010, of its now largely dormant predecessor company, Second Sight Support Services Ltd ('SSSSL'). SSSSL was appointed in June of 2012 by Post Office Limited ("POL") to carry out Horizon-related investigative work (SSIL was incorporated much later, on 31 May 2021). For ease, throughout this Witness Statement, I shall refer to SSSSL as Second Sight.

2. This Witness Statement is made to assist the Post Office Horizon IT Inquiry (the "Inquiry") with the matters set out in the Rule 9 Request dated 3 April 2024 (the

“Request”). I have been assisted in preparing this witness statement by Freeths Solicitors.

PROFESSIONAL BACKGROUND AND QUALIFICATIONS

3. My qualifications and career history are as follows:
 - a. 1966 to 1975 – External Auditor (subsequently specialist Electronic Data Processing (“EDP”) Auditor) at Josolyne, Layton-Bennett & Co (subsequently acquired by Ernst & Young)
 - b. 1971 - Qualified as an Accountant and became a Member of ICAEW
 - c. 1979 – Recognised as a Fellow of ICAEW
 - d. 1975 to 2002 – Citibank – I held various senior positions including as an EDP/IT Systems Auditor, Regional Head of Internal Audit, Director of Citibank International Ltd (and Chairman of its Audit and Risk Committee), Chief Financial Officer of Citigroup Global Asset Management Ltd, Head of Investigations in Europe, the Middle East & Africa, and finally as Global Head of Banking Investigations and Head of Security for Europe, the Middle East & Africa
 - e. 2002 – 2010 - Director (Global Fraud Management Team and Head of Fraud Management in Europe, Middle East and Africa) at GE Capital.
 - f. I am also a Member of the Association of Certified Fraud Examiners (the ‘ACFE’) and of the Association of Corporate Investigators (the ‘ACI’).

BACKGROUND

4. As above, SSSSL was incorporated on 11 March 2009 by David and Susan Jeffries. I subsequently became a Director of SSSSL on 1 April 2010. SSSSL was incorporated to act as a vehicle for David Jeffries to provide consultancy services on business improvement techniques known as 'Six Sigma' and 'Lean'. I knew David as he was a colleague of mine when I worked at GE Capital, Susan is David's wife.

5. I assisted David Jeffries with the name for his business, which he ultimately incorporated as SSSSL and I played a minor role in SSSSL whilst I remained at GE Capital.

6. As above, POL instructed SSSSL in 2012 to assist it with an Inquiry into Horizon and I used SSSSL as a vehicle through which to contract with POL. At that time, Ian Henderson was brought into SSSSL to assist with the Inquiry into Horizon. I knew Ian from my days at Citibank where he assisted me, as a sub-contracted investigator, on several major high-tech investigations. Ian is also a Chartered Accountant and has extensive experience and skills in matters of business technology.

7. As detailed above, I have held a number of senior positions within large financial organisations and my focus within those organisations was latterly on investigations and repairing broken processes.

8. During my eight years as the Chief Financial Officer of Citigroup's Global Asset Management business, which managed very large investment portfolios for large companies, countries and for royalty, I re-designed internal processes and its business model, succeeding in turning it around from being a significant and embarrassing loss-maker (losing around USD 50 million per annum), to one that was thereafter a substantial (around USD 100 million per annum) profit contributor. Obviously, this turnaround had to be achieved while at the same time maintaining and further improving the already outstanding quality portfolio management services being provided to its clients. In that respect, one can see a comparison to the challenge that faced POL back in 2012 when tasked by government to turn it into a profitable business.

9. After my eight years within that part of Citibank, I was invited to head up Investigations in Citibank's EMEA Region, and later was promoted to be its Global Banking Investigations Director. In that position, I had teams of investigators around the world dealing with all large cases (broadly, all of those cases where the loss exceeded USD 5 million) involving internal and external fraud, extortion, employee misbehaviour, and any mysterious discrepancies. That workload, covering over 100 countries, was handled by over 100 investigators, all of whom were very highly experienced, senior, high-flying officers. We fielded multi-disciplinary teams, including employees with skills in physical and electronic security; IT and systems design; intelligence; police investigations; banking; etc. Whereas my team's recoveries from fraud perpetrators routinely exceeded USD 100 million p.a., we found that clearing innocent people who had at first looked profoundly guilty was every bit as rewarding,

and also hugely beneficial from a business perspective. We found it relatively commonplace for innocent employees (and sometimes innocent customers) to fall under suspicion as a result of seemingly incriminating evidence that had been placed by the true perpetrators.

10. We had established, from years of practical experience, that shallow, superficial investigations would all too often result in the wrong person being fired (few cases proceeded to civil recovery action and fewer still to criminal prosecution and sometimes a poor-quality investigation had already been carried out locally before my department had even been informed about the case). I therefore made it clear, to all of my investigators around the world, that they should be: “*as enthusiastic about finding evidence of innocence as evidence of guilt*”; and that they should: “*reverse previously-learned investigative polarity*” ... instead: “*formulating first a hypothesis that the primary suspect was guilty... and then seeking evidence of innocence, rather than focussing relentlessly on searching for evidence of guilt and thereby failing to find, let alone to report (or to disclose) exculpatory evidence*”.

CHRONOLOGICAL ACCOUNT

11. In order to assist the Inquiry, below is a chronological account of my relevant dealings with POL, from the outset of Second Sight’s involvement in the initial Inquiry, through to the Mediation Scheme and ultimately its disbandment by POL.

a. The Second Sight Inquiry [POL00000218].

12. On 22 May 2012, I received an email from Susan Crichton, who earlier that year had been appointed as POL's General Counsel. It was a very short, two sentence message with the subject "HELP!". The email started with the words "*Hi Ron, I am looking for a forensic accountant with a human face*". This was the first time I had heard from Susan Crichton for some time but I was well aware of who she was as, during my time at GE Capital, Susan and I had offices on the same floor of a building in Agar Street in London. My own office was adjacent to GE Capital's General Counsel and, during my time at GE Capital, Susan Crichton was appointed as GE Capital's General Counsel. In my opinion, GE Capital was a superb meritocracy and one where you could always be certain that people at the top of the tree were not only highly competent but also hardworking and of the highest integrity. Susan Crichton was, in my view, just such a person and one whose undertakings I was therefore confident I could trust.

13. Following Susan Crichton's email, I attended a meeting with her, Simon Baker and Lesley Sewell from POL and Ian Henderson. Following that meeting, on 1 June 2012, I sent an email to Susan Crichton and Simon Baker attaching a seven page PowerPoint presentation titled "2nd Sight – Horizon Matters – Proposal" **[POL00096576]** (the "Proposal"). The PowerPoint summarised my (and Ian Henderson's) understanding of what POL was seeking. It was in the nature of an 'echo-back' of the independent and thorough review that we were being invited to bid for.

14. At page 2 of the PowerPoint, there are six bullet points which were to be the principal focus of the review. In my opinion, it is clear from those six bullet points that Second Sight's investigators were to look for and surface any evidence that suggested that:

- a. POL may have failed to thoroughly investigate any supposed perpetrator's allegations that POL's own systems, or its own inadequacies, might have caused some branch shortfalls;
- b. assertions that "*Horizon itself may be the Real Culprit*" might have a basis in truth;
- c. the Courts, or counsel representing Subpostmasters ("SPMs"), might have been misled and that evidence that ought to have been disclosed had not been disclosed;
- d. there was any systemic answer to the question: "*where did the money go?*" ... and whether claims that "*false accounting was the only way out*" were supported by the facts;
- e. there exists any evidence of systemic flaws or control weaknesses within the new (online) or old (batch mode) Horizon systems, or in POL's operational procedures; and
- f. POL may have failed to do anything that it should have done... or done anything that it should not have done in regard to investigations and prosecutions.

15. I suggest that no reasonable person could possibly have failed to understand that the review envisaged in my Proposal was intended to address the possibility of prosecutorial misconduct. Indeed, we had been informed that this was the *primary focus* of the MPs who had brought pressure to bear on POL's Chairman and CEO to carry out a review. In due course, as we met the MPs, it became crystal clear that this indeed was their primary concern.

16. I have subsequently learned, on reading a two-page email dated 6 June 2012 (that I had not previously seen and that has been disclosed to me by the Inquiry **[POL00096575]**), that Susan Crichton had summarised my PowerPoint for Paula Vennells. I note that the email is largely a cut-and-paste from my PowerPoint, with relatively few changes. Having now read that email, I am even more shocked than I was when, as early as May of 2013 and thereafter, Paula Vennells contended that Second Sight had never been invited to look for any evidence of unsafe prosecutions.

17. In short order, after sending Susan the PowerPoint, Ian Henderson and I were invited to two meetings at Portcullis House, on 4 and 20 July 2012, chaired by James Arbuthnot, and attended by Oliver Letwin and several other MPs. It was obvious to us that the purpose of those early meetings, not all of which I have details of (although I do have clear memories of what took place) was to allow the MPs, POL and the JFSA an opportunity to reassure themselves as to the competence and independence of myself and Ian and whether Second Sight was likely to be a good choice for that important, albeit at that point seemingly relatively straightforward, assignment.

18. I can see from [POL00096834] that James Arbuthnot described the later meeting as “*a very good meeting*”. It was attended by Ian Henderson and myself, along with Alan Bates and Kay Linnell (representing the JFSA) and James was interested to hear Paula’s thoughts. This prompted a positive response from Paula Vennells and then a ‘Thank you’ from James Arbuthnot. It was agreed that cases identified by MPs would be referred through the office of Janet Walker in James’s office and from there onward to Alwen Lyons and that Second Sight would gather the JFSA’s “*best cases*” for investigation as part of our ongoing work.

19. In due course, Second Sight was approved by all the parties and a decision was made, which we later came to deeply regret, that although Second Sight’s ‘clients’ comprised the MPs and the JFSA as well as POL, the contract would be between Second Sight and POL, with no oversight by the MPs and only some ‘mild’ oversight, on behalf of the JFSA, by Kay Linnell.

20. One of the MPs, Andrew Bridgen, was clearly deeply troubled by the proposal that POL would be Second Sight’s paymaster and contractual client, predicting that it would lead to serious trouble. History shows that he was completely correct, but his insistence that Second Sight should be contracted by the Treasury was overruled. He was also, we soon learned, deeply suspicious that Second Sight, having been proposed by POL, would embark on a ‘whitewash’ but he was apparently reassured (by a mutual acquaintance of Mr Bridgen and myself) that he needed to harbour no fears in regard to either my competence or my independence. With that as the background, Second Sight was invited to accept the assignment.

21. At a very early stage, as far as I recall early in June of 2012, and before we commenced any investigative work, I had a meeting at Old Street with Alice Perkins and Paula Vennells, the Chairman and CEO of POL. My aim, at that meeting, was to obtain clear and credible assurances, from POL's 'Top Brass', that they and their staff would help me, and my fellow investigators, establish the truth. I needed to be convinced that there would be complete openness and transparency, and that POL was clear we would be 'let off the leash' and not only allowed access to everyone and everything that we needed (including documents that were labelled as confidential/privileged), but also to confirm that we would be *actively helped* in our efforts to establish the truth.

22. I made it perfectly clear that, absent POL's unfettered cooperation, any investigation would be interminably slow and expensive and that that was not the sort of assignment that I and my fellow investigators would be prepared to undertake. I left Alice Perkins and Paula Vennells in no doubt that I had no interest whatsoever in embarking on a thwarted search for evidence. I was by then satisfied that I had received clear promises of co-operation, assistance, and unrestricted access to whatever documents we would call for, from Susan Crichton, Alice Perkins and Paula Vennells. Those assurances were unequivocal and provided with such clarity and apparent sincerity that I accepted them and, therefore, the assignment.

23. At that same meeting at Old Street (referred to in paragraphs 21 and 22 above), I remember alerting Alice Perkins and Paula Vennells to the possibility that our investigations might reveal that Horizon was indeed flawed, that their investigations

had been inadequate, that its SPMs' accounts had been tampered with, and even that SPMs had been defrauded by POL or Fujitsu employees. I told Alice and Paula that, if it turned out that these things had happened, the impact on POL might well prove to be existential. Despite my clear warnings, I did receive the assurances and promises that I had asked for with regard to full and open access. Had I not been convinced, I would have had no hesitation in pulling away from the proposed assignment. On reflection, I don't think they thought it remotely likely that Second Sight would find anything that would pose anything like the threat that I was warning them of.

24. Ian and I discussed how best to approach the investigation of the small number of cases that had at that time been submitted by the MPs and by the JFSA. We determined that we should try to identify and isolate individual *events*, within each submitted *case*, that it would be possible to investigate, so as to try to establish the underlying root causes of allegedly 'mysterious events' (mostly shortfalls reported by Horizon). We came up with the term 'Spot Reviews' to describe those events. We also realised that, unless we could find a coherent summary of cases and events, we would ourselves need to create a database of issues.

25. I had therefore asked Susan Crichton, as I recall at our first or second meeting, whether I could examine POL's 'General File' containing notes about already-reported Horizon-related events. By 'General File', I am referring to a compendium of letters, reports, court judgments and other material relating to criticisms not just of the Horizon system but also any criticisms of any human or computer-based processes underpinning the business. This compendium would necessarily also include any

suspicious or allegations of spurious system-generated or POL-generated discrepancies, and so on. I would have expected every assertion of a material discrepancy to have been properly investigated such that either: (i) the assertion was dispensed with based on solid factual evidence; or (ii) it was found to be justified (in which case a system fix would have been initiated such that the event would not be repeated); or (iii) a few cases would inevitably remain unsolved. Those few cases would need to be clearly identified and reported upwards. All of this is standard investigative practice and allows investigators to see, and to follow, linkages between events and cases.

26. I was shocked to hear from Susan that she knew of no such file. I was told POL had, as far as she was aware, never gathered into one place all reports about unexplained mysterious discrepancies, assertions of suspected bugs, etc. It was my experience that investigators would normally create and maintain a case database in order to help them notice patterns, find links between cases, and so on. It is almost unthinkable that a competent investigation team would fail to have such a file or Case Database. Normally, the 'General File' or Case Database would also be fully searchable. An important benefit of such a file or Case Management System would be to facilitate disclosure in civil and criminal cases. POL not only seemed to have no such system, but also no *desire* to have one.

27. The absence of that normally available 'groundwork' meant that we were unable to get answers to fundamental questions such as: "*How many 'mysterious discrepancies' or incidents have been reported to Post Office?*"; "*What are the biggest*

mysterious shortfalls and surpluses that have occurred?"; "What products or services seem to be the most problematic?"; "How many customers have reported being charged for goods or services that they didn't receive... or receiving goods or services for which they were never charged?"; "Were there any civil or criminal cases where the claimed 'robustness' of Horizon was undermined or disproved?"; or even: "How many suicides or attempted suicides have allegedly been linked to Horizon issues?".

28. In essence, and to my surprise, we found that we would be starting with a blank piece of paper and would be faced with the prospect of finding the various silos, within POL and Fujitsu, where the information and evidence, that we knew we would need, might be located (assuming that anyone had bothered to retain it). I recall that Susan was as frustrated as I was that there as yet existed no such central repository of essential material.

29. I had also noticed, as soon as the first legal files were shown to us, that there was a large 'Destroy by' date written on the top right-hand corner of each file. As far as I recall, the date on the Jo Hamilton file was imminent, perhaps as early as January 2013. My colleague, Ian Henderson was also notably alarmed by this and asked that a 'litigation hold' be placed on all documents likely to be needed for our investigation. Susan Crichton readily agreed to Mr Henderson's request.

30. In November 2012, the 'Raising Concerns with Horizon' document was publicised [**POL00000218**]. It had been created in a joint effort involving POL, the

JFSA and Second Sight and its intention was to invite SPMs (and their employees and also the employees of Crown Offices) to apply to have their cases independently re-examined. It eventually resulted in 150 applications to the Mediation Scheme. There were no prohibitions as to the eligibility of Applicants, other than that they needed to be SPMs or branch staff, or Crown Office employees. There was certainly no suggestion that Applicants who had been convicted of criminal offences (e.g. Jo Hamilton) would be ineligible. Later, POL came to renege on that original commitment.

31. By January 2013 or thereabouts, the list of submitted cases for Second Sight's review had risen to 21.

32. It was Ian, as I recall, who, early on, came up with the term: 'Thematic Issues'. We had quickly noticed that many of the SPMs, whose cases we had started to examine, were reporting similar, or even near-identical, issues. This, to us obvious and expected discovery, seemed immediately to be disliked and rebutted by POL. Seniors such as Angela van den Bogerd, consistently asserted that there were few similarities, or even none at all, between the various cases. Ian and I were never persuaded by that argument, so we pressed ahead with creating a spreadsheet to capture that information. The first decent version of it appeared in July of 2013, and we called it: 'The Thematic Issues Spreadsheet'. We had recognised, from the outset, that we would need to be able to quickly answer questions like: "*How many Subpostmasters – in our sample of cases – had complained about inadequate training*" or about lottery-related or ATM-related difficulties; about difficulties with ENs (Error Notices) later referred to as TCs (Transaction Corrections)), about anomalies

suspected of being caused by power or telecommunications interrupts, or by faulty hardware, etc.

33. Eventually, as we loaded into the Thematic Spreadsheet the information about the 150 cases submitted to the Initial Complaint Review and Mediation Scheme ('the Mediation Scheme'), we had listed 19 Thematic Issues. As it evolved, the Thematic Issues Spreadsheet proved itself to be central to our investigation, and extraordinarily helpful not only in answering those questions, but also in being able quickly to find cases that involved similar phenomena so that the underlying characteristics could be quickly and easily compared.

34. As early as February 2013, as we were investigating the 'Spot Reviews', we realised that a defensive attitude was taking hold in POL and that this was seriously impeding investigative progress. Also, we had started to notice that POL was routinely answering our questions not with evidence of *what had actually happened*, but instead with quotes from procedure manuals that described *what was meant to happen*. We were already becoming exasperated with that story, so I made it clear that such assertions would carry little weight. I referred to some of the controls that POL was insisting we could and should rely upon as: "*controls for those who wish to obey them*". I wrote to Susan Crichton about this on 7 February 2013 [POL00184716] and also sent an email to James Arbuthnot, to alert him to that defensiveness. At that time, I was complimentary about Angela van den Bogerd who had proved herself to be POL's most knowledgeable person (in regard to its operational practices) and, at that time, someone who seemed to be as committed to the 'search for the truth' as we were.

35. I have seen, from the 'Update March 2013' document [**POL00097589**] which I had not previously seen before reading it while preparing this Witness Statement, that, by that time, the MPs had submitted 28 cases (through James Arbuthnot's office) and the JFSA had received a further 60 cases. The likely cost of the investigation was consequently increasing to a level that was, it seems, causing some concerns for POL. That problem had been mentioned verbally in meetings with Susan Crichton.

36. On 25 March 2013, Ian and I attended a meeting at Portcullis House, chaired by James Arbuthnot and attended by ten other MPs (or their representatives), Alan Bates and Kay Linnell from the JFSA, and two solicitors from Shoosmiths, who at that time were instructed by some of the SPMs. The purpose of that meeting was to update the MPs, the JFSA and Shoosmiths as to the progress of the investigation that Second Sight was then carrying out, the process that we had adopted, our preliminary findings and to answer any questions posed by the MPs. At that point, 49 cases had been submitted to Second Sight for examination, 29 having come through the MPs and 20 through the JFSA. Progress was slower than we would ordinarily have expected, and we said that it was too early to report any firm conclusions [**POL00105631**].

37. The outcome of the meeting was documented by Ian Henderson in a File Note that led to some controversy as to precisely what had been said. It consequently triggered a series of emails [**POL00097883**] asserting that Ian's recollection of what had taken place in the meeting was in some parts at odds with those of others present. The most serious among those disagreements was expressed by Alan Bates, who wrote to James Arbuthnot, noting his disappointment that there hadn't been an

agreement by Second Sight that its investigators would focus on the many “*systemic issues*” which he was so keen to see surfaced.

38. Early on in our work, Ian and I considered very carefully how we should go about the work and who should do what. We agreed that Ian, who had particular expertise in data recovery and handling and also in matters of evidential sufficiency, would be based mainly in POL’s HQ, ideally alongside its in-house Prosecutions Team, led by Jarnail Singh, gathering POL data. I, on the other hand, would head off around the Country to interview those who were asserting that they had suffered by having to repay shortfalls which they were saying had mysteriously appeared in their branch accounts.

39. It was also obvious, very early on, that as the number of cases that we were expected to investigate increased, we would need to hire in additional investigators. After decades in the investigation world, Ian and I had no difficulty in coming up with suitable candidates. We had recognised that this was work that we would not delegate to a hired-in bunch of unproven strangers. We brought in three further investigators, all of whom hit the ground running and absorbed the case-related knowledge that we were able to pass on. They produced first-rate work, but we instituted an extraordinarily thorough quality assurance process, led by the outstanding Chris Holyoak. Every single report that we produced was vetted and critiqued, line by line (in multi-party video-conference calls), by a second set of eyes (either by Chris, Ian or by myself) before even a draft was released. This meant that even reports that I had

written would not be approved without them having survived line-by-line examination, criticism and improvement by Chris and Ian.

40. To provide some more detail on the drafting process, when a draft report was ready, it would be in tracked changes, labelled with the relevant version number and sent across to POL with an explanation of what we had and hadn't changed. The process was the same for all of our reports, including Part One, Part Two and every single Case Review Report ('CRR'). POL saw every draft that was written. Alan Bates was also privy to the evolution of our reports but perhaps not to every draft. I believe the contents of our reports remain to be the truth. The Interim, Part One and Part Two reports still, to this day, answer many of the questions that the Inquiry is asking, and, even in the face of revelations in the High Court, in the CACD and in the Inquiry, we have found no need to issue any corrections.

41. Where we couldn't resolve a point of conflict within a report, we would flag it in the relevant place. An example of a conflict within a report would be the issue regarding Fujitsu's Bracknell office (i.e. POL denying that Michael Rudkin had ever arrived at the meeting that he said he had been invited to). I encouraged Michael to search through his emails to locate the original invitation which, fortunately, he found. I had requested this email from POL multiple times, but they said they could not find it. It was this kind of pushback that meant that our CRRs went through multiple drafts, sometimes five or more. I had never before encountered such ferocious and determined pushback from a business or client. I was very used to dealing with conflict in my profession but had never encountered such ferocious resistance to almost every

sentence used in every report. Every point we raised, that we knew to be true, received monstrous and illogical pushback. Their approach was, in my experience, unprecedented, particularly during the drafting of our final report and many of the CRRs.

42. Eventually, as pressure mounted, with the number of cases; their complexity; the volume of documents and the necessary research all increasing, along with pressure to increase the pace of report production, we considered hiring in more investigators. Ian and I agreed that the more investigators we deployed, the less likely it would be that we would see any linkages between cases. We would risk failing to observe and report on the often re-appearing 'thematic issues' that we had recognised as being central to the matter in hand. We also knew how long it had taken us to get to grips with the enormous complexities of POL's systems, processes and behaviour, and how long it had taken us to teach our three new investigators what was needed in order to give them a chance of meeting our high standards of investigation and report writing. We came to the conclusion that the answer was simply for the five of us to work around the clock. For me, that meant seven days a week, starting at 8:00am and often not finishing until 2:00 or 3:00 the next morning. Needless to say, we didn't book anything like that many hours to POL!

43. Early on, as I interviewed the first half-dozen or so SPMs, I heard some truly harrowing stories. Most memorably, my meetings with Pam Stubbs, Jo Hamilton, Julian Wilson, Alison Hall, Michael and Susan Rudkin and of course, Lee Castleton all had an emotional impact. The interview with Pam Stubbs is seared into my memory.

Not only was I dealing here with a third generation Subpostmistress, but once again someone of obvious honesty and integrity. She immediately struck me as a highly intelligent, well organised, methodical lady. Her problems had arisen only after she had moved the Horizon hardware into a portacabin while the main Post Office was being refurbished. She encountered repeated telecommunications outages, so it was unsurprising that shortfalls occurred and they were way beyond any problems that she had ever before encountered. The interviews with Julian Wilson, Jo Hamilton and Michael and Susan Rudkin were equally compelling. These were not crooks. They were straight talking, hard-working businesspeople whose stories were not only harrowing, but well-evidenced.

44. I had met with Lee Castleton on 16 February 2013. Lee, along with his father-in-law Alan Franks, drove all the way down to my home/office in the Cotswolds. I had already told Lee that I was perfectly happy to drive up to see him (because I knew he was bankrupt) but he insisted on coming to see me. When I admonished him for doing that, he said: "*I would have crawled all the way here on my hands and knees for the opportunity to speak to you face-to-face*". His story was no less compelling and convincing then than it is now, after all these years.

45. After the meeting with Lee Castleton, I went to POL headquarters to see Susan Crichton. I asked her what on earth POL had been up to in spending £321,000 trying to recover a debt of £26,000 from a person who they knew had no money. Susan said: "*It wasn't me that did that... it was my predecessor*". I told Susan that the only occasions on which I had ever approved such ferocious, and seemingly non-

commercial, legal action was when we wanted to retaliate against - and inflict harm upon - an opponent. I said that the only occasions that we ever did that was when we were dealing with organised crime and wanted to get the message out that a softer victim would have been a better choice. Susan, a right-minded person in my view, concurred with me and clearly acknowledged the harm that POL had deliberately inflicted on Mr Castleton and his family. I need not have been so outspoken to Susan. As an experienced General Counsel, she didn't need me to lecture her about proportionality, commercial commonsense and morality. I was pushing on an open door. But I'm afraid I did it anyway.

46. After discussions with Ian Henderson as to the seriousness of his findings of probable prosecutorial misconduct from his review of the small number of legal files to which he had been given unrestricted access (only seven as I recall), I decided to speak directly with Susan Crichton about that very important matter. I believe this discussion took place in August or September 2012. During a meeting with her I said that, whereas I was confident that Second Sight had the ability to assess the adequacy of evidence in cases of suspected fraud and financial theft, we were Forensic Accountants, not lawyers experienced in criminal prosecutions or defence, so it was essential that our findings be quickly, thoroughly and independently either ratified or refuted by a competent barrister experienced in criminal cases. Susan who, like practically every other General Counsel that I had ever met, claimed no expertise herself in matters of criminal prosecution, said that she would take the matter to Cartwright King.

47. I remember very clearly that I laughed out loud at that, to my mind, simply preposterous suggestion and responded by saying that Cartwright King would, in my opinion, be an entirely unsuitable choice, because they could not ever be viewed as independent and they would, in effect, then be 'marking their own homework'. I recommended instead that she go to a higher-ranking firm and suggested some names. I was astonished at Susan's response which was along the lines of: "*that won't work, the Board won't approve that sort of expense*". I responded with words along the lines of "*Well then, you're all GRO mad... this is an extraordinarily important issue, why is cost in any way relevant?*".

48. Despite the nature of my interviews with SPMs, I really think that, oddly enough, initially, my work was unaffected by those harrowing stories – I did not approach anything differently. I knew how important it was to remain unemotional, objective and impartial. I approached every new case with an open mind, ready to encounter both heroes and villains. Every case was handled on its merits and based on the evidence but also, of course, on the credibility of the witnesses that I spoke to. These were either the SPMs, or POL's 'experts' who were generally rebutting what the SPMs had said. In every case, I was alert to the possibility - I might even say to the probability - that I would hear, from Applicants, stories of system anomalies that were imagined rather than real, or allegations that POL's own employees had made mistakes and perhaps acted dishonestly. As I have said elsewhere in my Witness Statement, a large number of SPMs possessed little or no evidential material with which to refute POL's accusations. In most cases, their access even to their own personal diaries and notes terminated on the day that they were suspended. I had also found it increasingly

frustrating that POL's so-called 'experts' were nothing of the sort. Not one of them possessed any expertise that was helpful to me.

49. Over time, my approach did change, but this wasn't so much because of the self-evident *innocence* of the SPMs, but rather because of the *behaviour* of POL (e.g. by pretending not to understand simple questions, and then providing standard form 'weasel worded' responses, or even trying to change the questions that I was asking). For example, we asked, "*has Post Office, or any of its subcontractors, such as Fujitsu, ever altered any SPM's account without the knowledge or permission of that SPM?*" and we were offered, time and time again, carefully crafted (no doubt lawyer-crafted) answers such as "*there is no functionality, in the Horizon system, to remotely access branch terminals*". I would respond "*that is a good answer to a question that I didn't ask*".

50. I came to the conclusion that they were giving me (and my team) the runaround. The evidence of their duplicity and disgraceful behaviour piled ever higher, and their initially subtle attempts to force me to throw in the towel became ever more blatant and forceful. It's been said that I "*sided with the Subpostmasters*". I'd like to think that I didn't do that, I simply found that I could no longer find any evidence that supported POL's case, so I may well have appeared to turn against them. But, right up to the end of our appointment, my colleagues and I were always looking for evidence that supported POL's assertions that all of the problems were someone else's fault.

51. On 10 May 2013, I sent, on behalf of both myself and Ian Henderson, a quite long email [POL00098208] to Janet Walker, James Arbuthnot's Chief of Staff, commenting on the letter that James' had received on 1 April 2013 from Alan Bates. My email confirms that a "*strong and respectful relationship has evolved*" between Second Sight and the JFSA and focuses on Alan's determination to persuade us to condemn Horizon for its "*systemic failings*".

52. I was accused, during one (recorded) conversation with Belinda Crowe, of using "*emotional language*" and I have no doubt that I was. But there was a very good reason for that. I was immensely frustrated to find that the only person in POL's top management team who ever acknowledged that their own people had been inflicting life-changing damage on innocent people was Susan Crichton. There were POL employees at a lower level, for example in the team that was drafting the Post Office's Investigation Reports ('POIRs') (e.g. Gayle Peacock and Shirley Hailstones) who showed creditable empathy, but I realise now that the 'messaging' from the top (and particularly from Mark Davies and from the external civil and criminal lawyers) was to never show any signs of weakness.

53. Among the bundle of documents sent to me by the Inquiry I now see that, on 23 May 2013, a further two-page 'Briefing for Paula/James Arbuthnot meeting' [POL00098317] was prepared. It is somewhat similar in content, and also in its apparently-intended purpose, to the earlier 'Briefing Document' [POL 00098354], although this one was now demanding an even further reduction in the sample of cases to be finalised: "*two to three MP cases*"... and yet further scope narrowing so

that that scope would now be stated as: “*answering the question: have systemic defects in the Horizon system resulted in the wrongful conviction of Subpostmasters (in either civil or criminal court)?*”.

54. I am afraid I have to comment on this. The proposal was simply preposterous, and it had clearly been devised in the knowledge (as openly shared in my 10 May 2013 email [POL00098208]), that we were at that time not minded to condemn Horizon for any “*systemic defects*” at all. We could not commit to wording that indicated the Horizon system was impacting POL’s entire network because, at that point, that was not what we had found, and we still had much work to do. It follows that, had James agreed to Paula’s request, it would have been extremely unlikely that we would suddenly change our mind on that point, and then also be able to prove that a wrongful conviction (or a civil court success for POL) had been achieved as a direct result of any (newly classified by us) ‘systemic defect’. Such a scope narrowing would have all but guaranteed that POL would have then been able to brandish a report from Second Sight that it would not only have been delighted to receive but that it would thereafter use as evidence that it had received independent confirmation of Horizon’s “*robustness*”. In fact, this is what happened, to the point that POL were claiming that there were no issues whatsoever which was a complete manipulation of the truth. I am certain that, had James agreed to Paula’s absurd proposal regarding our scope (about which I was unaware until writing this Witness Statement), I would have instantly pulled out the Second Sight team.

b) Interim Report of 8 July 2013 [POL00099063] (“the Interim Report”).

55. I note that the Interim Report opens by noting that the remit of the investigation had been later defined as “*to consider and to advise on whether there are any systemic issues and/or concerns with the ‘Horizon’ system, including training and support processes, giving the evidence and reasons for the conclusions reached*”. Paragraph 1.4. of the Interim Report explains that Second Sight had taken a broader view in its investigative approach, but it now seems obvious that POL was unwilling to acknowledge that wider scope and that, consequently, this would generate friction between POL and Second Sight. I have referred earlier, in paragraph 53 of this Witness Statement, to the intention of POL seniors to narrow down the investigation scope, but I need to explain to the Inquiry that it was our belief, at that time and thereafter, that the group of MPs and the JFSA (both of which we still regarded as clients) remained as concerned as ever they had been about far wider matters than merely “*systemic issues and/or concerns with the ‘Horizon’ system*” and for us to have thought otherwise would have meant that all parties had agreed that POL’s wider *behaviour*, and certainly *its behaviour in respect of investigations and prosecutions*, were no longer of any concern, but that most certainly had not been agreed.

56. I now know that the concerns I held at that time, with regard to POL being desperate to narrow the scope, were well founded because I have had sight of the “Draft Internal Briefing Note to Paula Vennells” dated 2 July 2013 [POL00029627]. That was evidently prepared in anticipation of the imminent publication of Second Sight’s ‘Interim Report’ and also in readiness for a meeting, due to be held on 3 July 2013, between Paula Vennells, Alwen Lyons and James Arbuthnot. Having only seen

this document when preparing this Witness Statement, I submit the following comments:

- a. in Section 3, under a heading that says: “SS’s *review is to:*” the Briefing Note lists what POL at that time seems to have understood was the purpose of Second Sight’s Review. It seems to me that POL had, as it were forgotten, or it had chosen to forget, the far wider scope that the MPs and the JFSA had sought (and that Second Sight had agreed to provide) and that that wider scope was now ‘dead and forgotten’ as though Second Sight and the MPs and the JFSA had all agreed to forget their clearly articulated wider concerns, which we, and they, most certainly had not forgotten.

- b. it was clear that, by that point, Second Sight had informed POL that its investigators had not found any evidence of “*systemic problems with the Horizon system*”. Once again, POL was inherently narrowing the scope, from a broad one that would be looking at POL’s *behaviour*, to an extraordinarily narrow/constrained one that would focus only, seemingly in their eyes, on *the Horizon computer system* and, more narrowly still, on *the Horizon software*. Had I been informed, at that time, that POL was pinning its hopes on James Arbuthnot and his fellow MPs, the JFSA, and Second Sight all agreeing to such a ludicrous re-definition of the investigation’s scope, I would have told them that they were deluding themselves.

- c. the Briefing Note described the three Horizon bugs about which POL was at that time aware and that would probably be mentioned in the

Interim Report, but it downplayed their significance and impact and also failed to mention the use of the interventions by Fujitsu that would be needed in order to correct the anomalies that had arisen because of those bugs. The Briefing Note mentioned the significance of one of the bugs to the Seema Misra and Lee Castleton cases.

- d. Once again, the Briefing Note cited past prosecution “successes” as buttressing POL’s assertions as to Horizon’s “robustness”.
- e. POL was getting ready to at the least issue a ‘rebuttal’ of Second Sight’s findings and also “*to consider replacing or introducing a new independent reviewer (such as one of the Consulting/Accountancy firms)*”.

57. It is quite clear, having now, after all these years, read that Briefing Note, that it marks the point where Post Office’s senior management had finally lost patience with Second Sight’s investigators and realised that it needed to rid itself of them.

58. We, in Second Sight, held the view that those concerns, that had been so clearly expressed by the MPs, and their equally clear expectation that we would be investigating them, had certainly not gone away but that our Interim Report was to focus, in the main, on the narrower issue of “*systemic flaws in Horizon*”. The inference - and our understanding - was that the original, far wider, scope had never simply vaporised and that we were still expected (by the MPs and by the JFSA) to address them. On reflection, it would have been helpful had we included words to that effect in

our Interim Report, although it seems now to be pretty obvious that POL would have fought hard to avoid conceding that. It is now clear that Post Office really had hoped that, after Second Sight's Interim Report, that wider scope investigation would simply never happen.

59. I can see among the bundle of documents sent to me by the Inquiry, Board Minutes for POL from a meeting held on 1 July 2013 [POL00021515]. My only comment on this document is that the CEO (Paula Vennells) seems to have denied Susan Crichton the opportunity to talk to the Board and instead conveyed an extraordinarily rosy summary of Second Sight's shortly to be released Interim Report, dismissing it as merely having: "*found no systemic issues with the Horizon computer system but had highlighted areas for improvement in support areas such as training*". I do not believe that this was an accurate summary of our findings nor had that characterisation of our impending report been cleared with me in advance.

60. I also note that Second Sight was not on that occasion, nor indeed ever, invited to play any part in informing the POL Board about our findings. That was in stark contrast to my years of experience as a Corporate Investigator, where it was normal practice, on important investigations, for me to be invited to assist the Board personally, rather than being represented not only by someone else but, as here, by one of the *subjects* of the investigation who clearly had 'skin in the game'. The CEO also seems to have informed the Board, in that meeting, that: "*the report from the forensic accountants was not as factual as expected and could lead to loose language at the MP meeting*".

61. I must observe here that, in my many decades of business experience, I would as a matter of course have routinely been invited (where my findings were being challenged) to address the full Board, or at the very least, a sub-committee of it, in order to be able to respond to any such (in this case behind the scenes) criticism. I now suspect that keeping me from these meetings was an attempt to give the CEO and the Board plausible deniability. Ian Henderson accurately described this behaviour as “*institutional blindness*” which summarises POL’s conduct throughout the entirety of my involvement. It is clear to me, from the documents the Inquiry has provided to me, that this mischaracterisation of Second Sight’s written (and verbally communicated) findings, and the invented criticisms of its investigators’ - and of my own - professionalism, objectivity and competence, was communicated right up to the highest levels in Government without either Ian or myself knowing anything about that.

c. Complaint Review and Mediation Scheme of 2014 [POL0000213], [POL00043353].

62. As far as I recall, the idea of launching a Mediation Scheme was the brainchild of Susan Crichton, who seemed to be as anxious as we (Second Sight, and also Alan Bates and Kay Linnell) were to draw in more and better-documented cases that it would be feasible to investigate and resolve. Susan was obviously, from the outset and until her departure in the Autumn of 2013, as committed to the unconstrained and independent ‘search for the truth’ as were we, James Arbuthnot and the JFSA (and, of course, the SPMs).

63. In or around September 2013, Susan Crichton informed me that POL was proposing to appoint Sir Anthony Hooper as the independent chair of the working party. I was pleased to learn of his involvement in the ongoing issues concerning POL and Horizon. But she also informed me that she was leaving POL.

64. Of relevance to that issue is an email [POL00099640], that I have seen among the bundle of documents sent to me by the Inquiry, which was sent, on 27 September 2013, by Susan Crichton to Paula Vennells, with copies to Angela van den Bogerd, Andy Holt, Mark Davies, Andy Parsons and Alwen Lyons. Susan informs them all that she had that day advised me that POL was proposing to appoint Sir Anthony Hooper as the independent chair of the working party, and that I had been "*positive about that*". She also informed her boss (Paula Vennells) that she had told me that morning that she was "*leaving POL*", inferring that I might have "*concerns*" about her sudden departure, and suggesting to Paula that it would be a good idea if she (Paula) was to telephone me about her departure. Indeed, Paula did that, phoning me (an 8-minute call on 4th October 2013) to reassure me. Reassuring as Paula's words were, I remember being sceptical, and keen to establish the true story.

65. Indeed, I do recall soon afterwards making a telephone call to Susan to hear the true story. I am afraid I cannot now recall exactly when I did that but the purpose was not only to try to get to the true story but also to, as I remember putting it: "*apologise...*" to Susan "*... for getting you sacked*". This was not a call that I recorded but I do remember Susan reassuring me, saying that there was no need for me to apologise, and that: "*you are doing what I'd hoped you would do... revealing the truth*". I was

mightily relieved to hear Susan say that, because I regarded her as a very capable and high-integrity friend and her sudden departure had been weighing heavily on my mind. Strangely, and sadly as far as I am concerned, Susan and I have never since been in contact. I make no further observations about the 27 September 2013 email other than to say that, as the Working Group progressed, I and my colleagues came to hold Sir Anthony in the very highest regard, not that he always gave us an easy time at Working Group Meetings.

66. Between 2 and 7 October 2013, I exchanged emails with Paula Vennells **[POL00099721]**, where I had sent eight examples of the cases that had come in to us, along with the (then very early form of) of our 'Thematic Issues Spreadsheet'. My aim here had been to convey some idea of the sort of matters that were being raised by the SPMs who were applying to the Mediation Scheme. I was also responding to Paula's 4 October telephone call which came following news of Susan Crichton's departure from POL, saying that her call had been "*not only reassuring but also very constructive*". Sensing a new and increased level of interest in the investigation, I offered to have Ian Hendeson and myself attend regular face-to-face meetings with Paula, either by telephone or at Old Street. That offer was never taken up.

67. During this time and ahead of the release of our Part One Report, as detailed below in this Witness Statement (and notably after Susan's departure), Second Sight began to experience very serious issues with POL seeking to change the scope of our investigation. As detailed elsewhere in this Witness Statement, for a while I had been sensing that POL was seeking to do that '*behind the scenes*', but on the occasion that

I outline below, it was much more overt. I have now seen relevant documents, passed to me by the Inquiry, that confirm the suspicions that I was forming at that time.

68. Within the bundle of documents sent to me by the Inquiry, I see that, on 27 January 2014, a document **[POL00100135]**, sent by Chris Aujard, the General Counsel who had come in to replace Susan Crichton, to the Chair and to the Chief Executive. I see, on reading this three-page document, that Mr Aujard reported that Ian Henderson had informed him that: "*James would be very focussed on whether there had been any miscarriages of justice*". He further advised that "*no applications for appeal have been made*". He also provides the relevant clauses of the then current draft Letter of Engagement **[POL00147259]**. POL's discussion with regard to the proposed terms of Second Sight's ongoing engagement continue in an email from David Oliver (who, although I have no recollection of his ever coming into contact with me or with any of my investigators, is shown as being the 'Programme Manager of the Initial Complaint and Mediation Scheme') to Paula Vennells, with copies to Belinda Crowe, Chris Aujard and Martin Edwards **[POL00100165]**.

69. There were clauses in the draft Letter of Engagement that included onerous, and to my mind excessively restrictive, wording that brought me to the point of pulling out the Second Sight team. As far as I am aware, those onerous terms were not disclosed by POL either to James Arbuthnot and his group of MPs, or to the JFSA. By this point, POL had, as I now see it (and as I at the time suspected), formed the view that Second Sight was entirely under its control and could be ordered to do, or be disallowed from doing, whatever it wanted.

70. I have also seen, among the bundle of documents sent to me by the Inquiry that, two days later, on 5 February 2014, another document was sent by David Oliver to Paula Vennells, with copies, once again, to Chris Aujard, Belinda Crowe and Martin Edwards [POL00116251]. That document proposes three options (shown as 'Plans A, B and C') to: "*take forward the issue with Second Sight*". I was completely unaware of any of that thinking, none of those ideas having been mentioned to anyone in Second Sight. I am unaware whether they were shared with James Arbuthnot or with Alan Bates, but I suspect they were not. I now see this as further evidence that POL was trying to find a politically-acceptable way of marginalising, or better yet completely ridding itself of, Second Sight.

71. As evidence of that, the document also considers the possibility "*that Second Sight will refuse to work under the proposed terms of engagement from Post Office and that they may attempt to insist terms that neither you or the Board can accept*". It goes on to say: "*in this scenario they may either walk away from the scheme or Post Office may have to end their engagement*". It is clear that, unbeknown to us in Second Sight (and, I suspect, also unbeknown to James Arbuthnot and to the JFSA), the gloves were off.

72. I have also seen, among the bundle of documents sent to me by the Inquiry, the final Engagement Letter, dated 1 July 2014, signed by Ian Henderson (on behalf of SSSSL) and Chris Aujard (on behalf of POL) [POL00000213]. I recall being so displeased with this document that I could not bring myself to sign it. But James Arbuthnot, Sir Anthony Hooper and Alan Bates had all urged me not to walk away so,

by way of a compromise, I asked Ian to sign it. I remember that it crossed my mind, at the time, that because Ian had not yet been appointed as a Director of SSSSL, this might give me some 'wriggle room' if I later needed it. Although I had sometimes referred to Ian as a Director, and indeed he was described as such in the Letter of Engagement, he was not actually appointed as a Director of SSSSL until 9 November 2018 (as shown in the records at Companies House). I also remember being so annoyed about the to my mind overly restrictive and ludicrous wording of the Engagement Letter, and of the demand that we destroy, upon demand, all copies of the documents and material that we at that time held, that my copy of the first draft of it was covered in, frankly, expletives. In that we were contractually obliged to return all of the documents to POL I can only assume that my marked-up copy eventually found its way back to POL. I also remember suspecting, at the time, that Mr Aujard was trying to provoke me into resigning and pulling my team of investigators away. It seems, from the documents that I have recently seen, that that was exactly what POL was trying to do.

d. Part One Report of 25 July 2014 [POL00004439].

73. On 25 July 2014, Second Sight released our 37-page Part One Report [POL00004439] (the "Part One Report"). The purpose of the Part One Report was to provide some essential information about POL and its agents (the SPMs) and the various types of branches, and to define and describe the terms and abbreviations that would later be used in our future reports. It was, essentially a summarised description of *how things were meant to be happening*, albeit with some mention of

areas where the potential for confusion or error might be occurring, and with the expectation that our yet to be produced Part Two Report would then describe *what had actually been happening* and *what had been going wrong*. The Part One Report usefully provides, in an Appendix, a ten-page list of acronyms and terms used throughout POL.

e. Part Two Report of 21 August 2014 [POL00030160].

74. On 21 August 2014 Second Sight released to POL an early draft of our Part Two Report [POL00030160] (the "Part Two Report"). At that point, this comprised only 23 pages. Later versions of this report became of course much longer, with the final 50-page (plus 40 pages of Attachments) version being released on 9 April 2015 [POL00029849].

75. Between the above Part One Report and the 9 April 2015 Part Two Report, and as we approached Christmas of 2014, I received (at last) from POL its response to the Case Questionnaire Response ("CQR") on the Carl Page case, Carl having been one of the Applicants to the Mediation Scheme. I had been massively disappointed - and thwarted - by the fact that POL had only submitted to me, as far as I can recall, three documents in support of its assertions that it had acted properly in regard to the three criminal trials that eventually resulted in the incarceration of Mr Page. As luck would have it, Mr Tom Cleary, who had helped Mr Page by preparing his CQR, provided me with thousands of pages of documents that he had retained after representing Mr Page

in the first two trials. The documentation that Mr Cleary sent me proved to be heavy going but I studied it all very carefully, eventually arriving at what I referred to as an astonishing hypothesis as to what had happened. It was an hypothesis that, to this day, I have been unable to disprove, and I consequently consider it likely to be true.

76. Without wishing to appear boastful, I suggest that I was equipped to unravel the extraordinary case concerning Mr Page because I am not only a highly experienced investigator but also a retired banker that has dealt extensively with FX trading and accounting. I have also been a successful FX and Derivatives Trader. Neither of the Court-appointed Expert Witnesses, who had previously tried to get to the bottom of what had happened in this case (both of whom confessed that they had been unable to do that), had the benefit of that sort of experience and expertise. I was also unable to find anybody at POL, when I was examining Mr Page's case, who possessed any expertise at all in FX accounting matters, nor any understanding of the way POL had, at the time of Mr Page's case, been accounting for foreign exchange transactions.

77. The hypothesis that I referred to above is as follows - When POL launched a foreign exchange selling and buyback service into a number of its branches (I believe around 1,000 of them), the functionality to deliver that service was provided by means of a front-end computer processor which it called the 'Forde Moneychanger'. Each branch offering FX services would be advised, every morning, of the various currency exchange rates that it would need to apply to both sell (at the 'retail rates') and to buy

back (at the 'buyback rates') any currency left over after people returned from holiday, etc. Counter clerks were authorised to sell, or to buy back, currency at those rates.

78. In the case of Mr. Page he, with authority from his Regional Manager (a POL permanent employee), sold vast quantities of Irish Punts and, later, Euros to a customer called Mr Whitehouse at favourable 'business' rates. The conclusion that I reached, which went way beyond the conclusions reached by either of the two Expert Witnesses who had been called in the criminal trials, was that POL had failed to design its accounting system in a way that properly coped with such 'off-market' rates. What it actually did, I believe, is to assume that the currency sold to Mr Whitehouse had been sold at the normal *retail* rates rather than at the *actual* rates that had been used. This meant that the system '*thought*' that Mr Whitehouse had been given fewer Punts or Euros than he had and that, consequently, some of those Punts or Euros were still in the branch's safe.

79. Over time, it seems that that 'phantom' stock of currency accumulated to be equivalent to nearly £300,000. Indeed, POL at first asserted that its losses on those off-market transactions aggregated to nearly £650,000. A fundamental flaw in the process that POL had deployed was that because Horizon was a single currency system (rather than the multi-currency systems used by banks and by foreign exchange dealerships like Thomas Cook), the aggregate Sterling impact of each branch's FX transactions was input into Horizon *only once per week* not *daily* or, better still, *transactionally*.

80. As a result of that aggregation within each branch and the further aggregation of all branches' weekly transactions, POL failed to notice for, as far as I can recall, over three years, the loss-making transactions input by Mr Page. Indeed, POL only woke up to the problem when tipped off by HMRC who themselves had been tipped off by Thomas Cook.

81. The problem was further compounded by a (to me bizarre), accounting practice of informing Mr Page that the cost of the Punts and Euros that he was selling to Mr Whitehouse was considerably less than the real cost. In consequence, when Mr Page sold at what he thought was making a healthy profit for POL, he was actually selling at a price that nowhere near compensated POL for the large loss that it had *already booked*.

82. In summary, if I am right (and, back in 2015, I invited POL to try to undermine my hypothesis but they failed to do that), that would mean that Mr Page was not only convicted of a theft *that he didn't commit* but he was convicted - and jailed - for a theft *that had never occurred*. That would mean that he was a victim not only of an unsafe prosecution as later confirmed by the CACD, but he was a victim of POL's fundamentally flawed accounting practices and of its seemingly non-existent transaction monitoring.

f. Part Two Report of 9 April 2015 [POL00029849].

83. On 11 March 2015, POL closed down the Mediation Scheme, disbanded the Working Group and gave Second Sight 30 days' notice of termination of our engagement. As I understand it, Sir Anthony Hooper was also on that same day informed that his services would no longer be needed. This of course triggered a series of emails, most notably from James Arbuthnot to his colleagues, the MPs, with a copy to myself [POL00102373].

84. Importantly, James Arbuthnot's email says: "*They [Second Sight] have been denied the documents they consider they need to determine whether a miscarriage of justice has taken place*". His inclusion of that statement confirms very clearly that it was always his expectation that our investigation would, if we discovered it (which indeed we had) report on any suspicions of miscarriages of justice. As stated elsewhere at various points in this Witness Statement, POL had, for a considerable time, been denying that this was ever something that Second Sight was qualified to look at, let alone to report on.

85. In early December 2015, I received a telephone call from the office of the then relatively new Chairman of POL, Mr Tim Parker. He invited me to come to his office to help him get up to speed on the POL Horizon matter. I later learned that Baroness Neville-Rolfe had, following a meeting that Ian Henderson and I had had with her, suggested to Mr Parker that he should meet with us.

86. On 15 December 2015 Ian and I went to Mr Parker's office where we met with him and Jonathan Swift QC. The meeting went on far longer than the pre-booked one hour, Mr Parker having insisted that we stay longer to answer more questions. We held nothing back at that meeting. Indeed, Mr Henderson later characterised it with the words: "*we gave him both barrels*". In practical terms that meant that we went through with Mr Parker and Mr Swift all of the thematic issues that we had covered in our Final Report back in April 2015. We made it perfectly clear that the 'Rebuttal Report', that POL had immediately issued alongside our Final Report, was utter nonsense and that were he to be deceived into placing reliance upon it or, worse still, endorsing it, the consequences would very likely be dire.

87. We heard nothing more from Mr Parker after that meeting but I did update James Arbuthnot about what had been said in it, in readiness for a meeting that James was shortly due to have with Mr Parker.

88. I was much later, in approximately September 2022, able to read Mr Swift's Report [POL00006355], which referred to that December 2015 meeting. That report includes, on page 50, the following quote: "*In our discussion with Second Sight, we were told that Mr Roll had said (in a recorded interview with them) that he and his colleagues could, and did, make alterations which affected the account balances in branches. Moreover, he is reported as saying that on one night he and his colleagues had had to secretly correct 500,000 glitches in one night which could affect branch balances. Second Sight said that Mr Roll had told them that under the contract Fujitsu would be fined by POL £10 for every glitch which was reported to them. We asked*

Fujitsu for their response to this allegation, which Fujitsu did not recognise and could not explain. Fujitsu suggested that it would probably not be possible to correct 500,000 software glitches in one night and certainly was not true. They could not suggest a plausible alternative scenario which the allegation might have been confused with. Mr Roll's allegation is, of course, second-hand via Second Sight and without any sort of detail or accompanying evidence. It does not appear in the Part Two Report. It does not seem to us to be a solid basis upon which we could criticise either POL or Fujitsu. We also note that the existence of a recording came as something of a surprise to us, as we had not seen any reference to Second Sight possessing such evidence before. We do not know the status of that recording or the extent to which POL is entitled to have access to it as material gathered under Second Sight's terms of engagement."

89. Neither I, nor Mr Henderson, were contacted by Jonathan Swift with a view to clarifying any of those matters so I say here that the recorded call (of which the Inquiry has a copy) was not referred to in our Part Two Report for the simple reason that it hadn't at that time taken place. The call was on 26 July 2015, five months before the meeting with Parker and Swift. It therefore post-dated our Part Two Report and indeed also the termination of our contract with POL. I am disappointed that neither Mr Swift nor Mr Parker were able to carry out less superficial enquiries and thereby establish the truth about the 'Fujitsu interventions' (and the reasons why they were needed and why they were being carried out covertly). Had this matter been pursued, as Ian and I had made clear to Mr Parker and Mr Swift that it needed to be, POL might not have placed the reliance that it did on the denial that such interventions were possible, let alone that they were routinely happening, and without any records ever being

maintained to show what entries were being passed over SPMs' accounts. Put simply, both POL and Fujitsu missed, or swerved, yet another opportunity to reveal the truth.

AUDIO RECORDINGS

90. During, as far as I can recall, May 2013, I decided to start electronically recording POL related telephone calls. I want to make it perfectly clear that:

- a. I have never before, nor since dealing with POL, ever covertly recorded any conversations with clients; and
- b. I recognised, at the time, that this was a momentous decision and not one that I made lightly or frivolously.

91. The reason that I decided to start routinely making recordings was because by then it had become clear to me that some of the POL employees with whom I and my team were dealing (the exceptions having been Susan Crichton and Simon Baker) were often not only answering Second Sight's questions with answers that we disbelieved, but were also, to my mind deliberately and therefore outrageously, starting to misquote and 're-craft' the questions that we were asking (see also paragraph 49).

92. It had also become clear to me, and also to Mr Henderson, that the documents that we were receiving from Post Office, which in due course principally comprised

POIRs, were routinely rebutting virtually every assertion made by SPMs or by my investigators and were never admitting any POL culpability (other than in regard to poor training and support). They were also arriving much more slowly than we thought they ought to have been. We had surmised (but we had no proof at the time, although this has now been confirmed in the Inquiry) that this was probably because everything coming to us was being filtered and edited by lawyers. I clearly remember being quite concerned about this. It was neither the open and collegial 'search for the truth' that had been agreed, nor did it evidence a desire on POL's part to deal with us, or the SPMs, in an open and transparent manner.

93. In consequence of that, I was not prepared to tolerate the risk that POL would later assert that we, in Second Sight, had not asked the questions that we had asked; that we had not informed people that we had informed; that we had said that we were satisfied with answers when we had not been, and so on. I had also sensed, correctly as I have subsequently learned, that POL was at that point trying to 'set us up to fail' or to persuade me to pull out my team (that being obviously far less dangerous, politically, than firing us) in order to rid itself of our progressively more unwelcome attention.

94. I should add that I had already been routinely recording interviews with SPMs, but that was always done overtly, with their approval and with my assurance to them (as most of them requested) that I would not, without their permission, disclose those recordings to POL or to Fujitsu, and also that, had they at any time wanted me to stop recording, I would do that.

95. It is normal investigative practice when interviewing subjects (in this case mainly SPMs) to take notes, and also to seek permission to capture recordings of the interviews. It is therefore uncontroversial that I routinely recorded those interviews, and always sought permission when doing that. I do remember several SPMs expressing their fear that the recordings might find their way into the hands of POL employees, who they feared would then vindictively punish them for criticising Post Office's own employees, or its systems. But of course it is not those recordings which are of particular interest to the Inquiry so what I have just said is merely to provide context.

96. The Inquiry is interested in the recordings that I covertly made when speaking with POL seniors and others. I have explained elsewhere, in paragraph 90 of this Witness Statement, that covertly recording client conversations was something that I had never done before, nor have I ever done since. I started doing that somewhat as a matter of routine when it had become obvious to me that some POL seniors were not only, as I saw it, feigning misunderstanding of the questions that I was asking but – far worse – they were changing those questions, forming instead questions that they were happy to answer.

97. Obviously, the most important questions were always communicated in writing, but a good deal of debate and clarification was handled telephonically, or in face-to-face meetings. Put simply, I lost confidence in, and began to distrust, the POL seniors with whom I was dealing. I started seeing ever more clearly that POL was the *subject* of our investigation as well as our contractual *client*. In consequence, I decided to

routinely record calls. Indeed, in many cases I recorded calls between Ian Henderson and myself, and between myself and Alan Bates and even between myself and James Arbuthnot. This was not because I distrusted them. Far from it, but rather it had become something of a reflex action for me to press the record button, not defensively but in order to be able to go back and check the precise words that had been spoken.

98. I can add very little to that summary, other than to say that I would do it again in those circumstances.

CRIMINAL CASES REVIEW COMMISSION (“CCRC”)

99. I see, among the documents supplied to me by the Inquiry, that, between 20 and 29 January 2016, there was a series of emails [POL00104202] dealing with an incoming email, from the CCRC, the contents of which seem no longer to be shown in that document. On the basis that the response, from Rodric Williams, was headed “*Horizon Demonstration*”, it seems likely that that was what the CCRC was seeking. It also seems that the CCRC was seeking POL’s permission to meet with Second Sight and that, notwithstanding that this was a year after our engagement had been terminated, POL wanted to keep Second Sight on what I might call “*a tight leash*” by insisting on having an opportunity to comment on any material comments made to the CCRC by Second Sight. The Inquiry has associated these emails with a far later date - 15 January 2020, because someone named Joel Durston for some reason sent copies of these emails to himself on that date.

100. I did visit the CCRC in Birmingham in or around July 2016. It was a very cordial and quite long meeting during which I shared with them my and my colleagues' findings to date. I recall offering to help in any way that I could. I, along with my colleague Ian Henderson, also had a zoom meeting with the CCRC on 4 March 2022, where we answered questions posed by the CCRC's seniors.

BATES & OTHERS GROUP LITIGATION

101. I had little or no advance warning of the JFSA's intention to press forward with litigation and certainly no indication whatsoever that they had secured litigation funding. What I did know, from conversations with Alan Bates, was that he had, quite early on in the Scheme, reached the conclusion that POL had no intention of making any meaningful compensation offers so he had come to regard the whole process as providing no benefits for the Applicants other than as an evidence gathering exercise. Once the litigation commenced, other than one meeting, with James Hartley of Freeths LLP and Patrick Green QC, and another with Jason Coyne and Dr Worden, neither Mr Henderson nor I were involved.

102. Both Mr Henderson and I offered our assistance to Freeths LLP if it came to be needed, but the severe constraints of our contract with POL, and its confidentiality undertakings, ensured that that did not happen.

103. When the case came to court, I avidly followed its progress, sometimes attending in person. I then read the judgments in full, alert to finding anything about

which my colleagues and I had been wrong in any of our reports, including our CRRs. Had I found anything like that, I would have issued corrections. In the event I found nothing at all that needed to be corrected. I similarly followed the Appeals at the CACD, and, of course, the Inquiry, again hearing nothing that demanded any corrections from Second Sight.

REFLECTIONS

104. I need to say something about Gareth Jenkins. My colleague Ian Henderson had more contact than I did with Mr Jenkins, including a face-to-face meeting at Fujitsu's Bracknell office. I remember Ian telling me that he had been impressed. He reported back to me that Mr Jenkins was, in his view, not only extremely knowledgeable on technology matters generally, and in regard to the architecture of the Horizon system, but that he had also come across as an honest and frank person.

105. In answer to Ian's question, as to whether there existed a 'back door' into Horizon, Ian told me that Gareth had been completely open about that, saying, as far as I can recall Ian's words: *"Of course we have a back door into the database, you're a computer expert, so you know ALL systems have back doors"*.

106. I do, however, need to correct something that I heard in Susan Crichton's testimony to the Inquiry. In all respects, other than what I am about to say, I have no criticism of what Susan said in her Witness Statement or under oath. The important

point that I need to make here is that neither Mr Henderson nor I said that we were impressed by Mr Jenkins as an 'Expert Witness'. What we did say, as I remember it, was that we were impressed by him as a systems/computer 'expert'. The distinction was clear to us, we did not think (from what we had seen) that he could have been aware of the duties that an Expert Witness would owe to the Court and so was partisan in his views concerning Horizon. It is possible that we failed to make that distinction clear to Susan, such that she misunderstood us on that point.

107. Looking back, in answering the question: "*Would you have done anything differently?*" I say this:

- a. I wish I had refused to allow my firm to be contracted with the subject of the investigation;
- b. I wish that I had demanded, rather than asked, to more frequently see Paula Vennells, but also, when I was doubting whether the truth was penetrating through to her and the Board, I should have demanded to address POL's full Board; and
- c. I wish that I had flatly refused to communicate with POL's CEO and its Board through the conduit of Chris Aujard, Belinda Crowe, Patrick Bourke and Angela van den Bogerd.

108. In answer to the invitation to bring any other matters to the attention of the Chair, I say this: If I had to select just one document to convey to him my feelings about the

situation that evolved during Second Sight's work at POL, it would be my email of 3 March 2015 at [POL00102280]. It says it all.

OTHER MATTERS

109. I had never, before preparing this Witness Statement, seen most of the documents supplied to me by the Inquiry. By seeing them, I have been able to understand - at last - what was going on behind my back. And I see now that a great deal was going on behind the scenes within POL. Those 'behind the scenes' activities included the commissioning of the Detica and Deloitte Reports; the receipt of the Clarke advices; the inception of 'Project Sparrow'; the misrepresentation of Sir Anthony Hooper's assessment of the quality of Second Sight's work; the conspiracy to persuade me to throw in the towel; and, most important of all, the relentless pressure on James Arbuthnot to drastically narrow the scope of our investigation to speed it up, to reduce the number of cases that we would be allowed to examine, and to constrain its eventual cost.

110. It has become clear to me that POL was:

- a. baulking at spending on the investigation as much money as it had blown on bankrupting Lee Castleton;
- b. trying to find another firm of accountants/investigators who would 'rubbish' Second Sight's findings or who would produce the 'Whitewash' that its Board wanted;

- c. desperate to hoodwink James Arbuthnot into instructing Second Sight to narrow its investigative focus such that we would only be permitted to comment on whether any of the SPMs, in the tiny sample of cases that POL wanted us to examine, “*had been wrongly convicted due to defects in the Horizon system*” (see paragraphs 53 and 54 above). That mercifully unsuccessful attempt (to persuade James to accept, and to then enforce, such a frankly ludicrous constraint) would have meant that Second Sight’s Interim Report would have been very short indeed and then there might well have been no Mediation Scheme, no Final Report, no High Court action, no convictions overturned and no Inquiry;
- d. aware, possibly at the highest levels (including its CEO, Chairman and Board), that:
 - i. its Horizon system had for years been producing spurious discrepancies in branch accounts;
 - ii. neither its investigators, nor its in-house prosecutions team, had kept any central record of reports about mysterious events that had impacted SPMs, clients, or customers and, because of that, had never disclosed those events in civil and criminal cases;
 - iii. a consequence of its in-house and external prosecutors’ improper behaviour and seriously inadequate disclosure, was that it had been responsible for numerous unsafe prosecutions, convictions, custodial sentences, bankruptcies and even suicides;

- iv. employees of Fujitsu, and possibly also its own employees, had for years been routinely and covertly tampering with branch accounts without keeping any records to show what they had done... and not informing the impacted SPMs about that covert meddling;
- v. their CEO and Chairman had both been deeply annoyed that Susan Crichton had 'injected Second Sight into the mix' and had then labelled her as a weak person who had proved herself incapable of reigning them in;
- vi. their own March 2015 'Rebuttal Report', that had 'rubbished' virtually everything that Second Sight had said in its Part Two Report, was itself shot through with delusional nonsense and that it would therefore seriously mislead (or provide 'Plausible Denial' to) its own Board; as well as Ministers and other MPs; and its later-appointed Chairman (Tim Parker);
- vii. its employees had subverted the criminal justice system in order to exploit it as an inexpensive (to itself but not to the taxpayer) asset recovery mechanism;
- viii. its own business model was deeply flawed and unsustainable;
- ix. its acceptance of a Government instruction to turn a profit could only be achieved by rolling out products and services

that its own operating platform could not safely deliver (e.g. ATMs, Lottery and Foreign Exchange), by progressively cutting the compensation of its SPMs and by loading risks onto their unrepresented shoulders; and

- x. its so-called 'Union', the NFSP, was nothing more than a submissive puppet department of its own company that possessed none of the skills needed to ensure that its members' interests, and indeed their safety, were catered for in the Horizon software or in their ever-changing operational procedures.

CONCLUSION

111. I agonised, over a decade ago, why I seemed to be failing to persuade so many high-ranking people (not only in POL but also in Government) that what I was saying was the truth. Back then I remember questioning whether I had lost my normally adequate ability to persuasively convey what needed to be said. But then one of my colleagues (it was either Ian or Chris) reassured me by reminding me of the famous 16th Century John Haywood quotation: "***There are none so blind as those who will not see.***". Years later, when I looked up the **full** quotation, I realised that the rest of it even more aptly describes what was really going on at POL, and it perhaps gives further insight into the evidence some of the witnesses have given to this Inquiry. The quotation continues"... ***The most deluded people are those who choose to ignore what they already know***".

Statement of Truth

I believe the content of this statement to be true.

GRO

Signed: _____

Dated: ___20th May 2024_____

Index to First Witness Statement of Ronald John Warmington

No.	URN	Document Description	Control Number
1	POL00021515	Post Office Limited Board Minutes of 01/07/2013	POL0000048
2	POL00021683	Letter from Jane MacLeod (General Counsel, POL) to Second Sight regarding breach of confidence	POL-0018162
3	POL00096575	Draft - Post Office Limited, Terms of Reference from Susan Crichton to Alice Perkins and Paula Vennells	POL-0096158
4	POL00096576	Post Office Limited: Proposal to carry out an Independent Review of Past Fraud and Theft Cases	POL-0096159
5	POL00096834	Email chain from Ron Warmington to Ian Henderson re: Printed SubPostmasters and 2nd Sight	POL-0096417
6	POL00184716	Email from Susan Crichton to Alwen Lyons Fw: Confidential - The Investigation - some real concerns	POL-BSFF-0022779
7	POL00097589	MP Cases Review of Horizon Update March 2013	POL-0097172
8	POL00097864	Email chain from Janet Walker to Alwen Lyons, RE: Second Sight note from meeting 25 March.	POL-0097447
9	POL00097883	Email chain from Martin Edwards to Paula Vennells, Alwen Lyons, Susan Crichton, and others re: Second Sight note from meeting 25 March.	POL-0097466
10	POL00105631	Agenda for meeting re Post Office cases.	POL-0104620
11	POL00122393	Second Sight Horizon Investigation Discussion Paper April 2013	POL-0127557
12	POL00098208	Email from Simon Baker to Alwen Lyons, re Letter From James re Alan Bates' letter.	POL-0097791
13	POL00098317	Briefing for Paula Vennells /James Arbuthnot Meeting	POL-0097900
14	POL00098354	Briefing for Paula Vennells/James Arbuthnot Call	POL-0097937
15	POL00098377	Note of Phone Call between Paula Vennells and James Arbuthnot dated May 2013	POL-0097960
16	POL00190160	Second Sight review into Horizon - briefing note on interim report	POL-BSFF-0028223
17		Draft Post Office Internal Briefing Note	

	POL00029627	to Paula Vennells: Second Sight review into Horizon - Implications of Interim Report	POL-0026109
18	POL00099003	Email from Martin Edwards to Paula Vennells re Board email.	POL-0098586
19	POL00099022	Statement from the Post Office published to address the Horizon investigation.	POL-0098605
20	POL00297371	Emails between Paula Vennells and Ian Henderson and others re: Second Sight Interim Report.	POL-BSFF-0135421
21	POL00099063	Signed Interim Report into alleged problems with the Horizon system	POL-0098646
22	POL00099088	Email from Lesley Sewell (Post Office) to Susan Crichton, Paula Vennells and others re: Draft statement and call with Alan Bates	POL-0098671
23	POL00099096	Email from Rodric Williams to Paula Vennells, Mark Davies and others re: Draft statement - Strictly Private & Confidential - Subject to Legal Privilege	POL-0098679
24	POL00099128	Email from Nina Arnott to Richard Weaver, Richard Walden, Carmel McCarthy and others re: Horizon Report Statement	POL-0098711
25	POL00099640	Email from Susan Crichton to Paula Vennells, Angela Van-Den-Bogerd, Andy Holt and others re: Second Sight	POL-0099223
26	POL00099721	Email chain from Ron Warmington to Paula Vennells Re: Investigation and mediation	POL-0099304
27	POL00100135	Letter from Chris Aujard to Chair and Chief Executive re: Further Briefing for James Arbuthnot Meeting	POL-0099718
28	POL00147259	Draft Engagement Letter in relation to the Initial Complaint Review and Mediation Scheme	POL-BSFF-0006382
29	POL00100165	Email from David Oliver to Paula Vennells re For 1130 Meeting - Mediation Scheme	POL-0099748
30	POL00116251	Note from David Oliver to Paula Vennells cc Chris Aujard, Belinda Crowe and Martin Edwards RE: Three Options to deliver a successful mediation Scheme with Second Sight	POL-0117245

31	POL00100323	Annotated Agenda, Meeting with Second Sight on 24 February 2014.	POL-0099906
32	POL00100336	File Notes for a meeting with Tony Hooper, Monday 24th February at 1:00pm.	POL-0099919
33	POL00100467	Email from Paula Vennells to Chris Aujard re. PRINTED RE: SS engagement letter	POL-0100050
34	POL00101296	Email from Louise Chatfield to Mark R Davies, Alasdair Marnoch, Alice Perkins and others re: Sparrow update	POL-0100879
35	POL00109475	Email chain from Avene O'Farrell to Belinda Crowe, Tom Wechsler re FW: Update on Mediation Scheme Progress	POL-0111051
36	POL00101571	Letter from Paula Vennells to James Arbuthnot MP re Complaint and Mediation Scheme	POL-0101154
37	POL00101596	Letter from Paula Vennells to James Arbuthnot MP re Complaint and Mediation Scheme. Disagrees with Oliver Letwin's suggestion re general presumption that all cases will be mediated.	POL-0101179
38	POL00101700	Letter from The Rt Hon James Arbuthnot to Paula Vennells re: Complaints and Mediation Scheme.	POL-0101283
39	POL00101711	Email from Patrick Bourne to Paula Vennells and Mark R Davies re: Meeting with Oliver Letwin	POL-0101294
40	POL00102001	Email from Ian Henderson Chris Aujard, re Second Sight's Investigations	POL-0101584
41	POL00109904	Email from Mark R Davies to Louise Chatfield re: FW: Second Sight's Investigations	POL-0111112
42	POL00117048	Email to Patrick Bourke and Mark R Davies from Tom Wechsler Re: Mr Sparrow Board Brief	POL-0117882
43	POL00117049	Sparrow work plan - January 2015	POL-0117883
44	POL00117054	Email from Mark R Davies to Patrick Bourke Re: Options - Comments	POL-0117888
45		Email from Patrick Bourke to Tom Wechsler and Mark R Davies with email from Paula Vennells forwarded. Relates to response to Second Sight Report and possibility	

	POL00117056	of closing the scheme.	POL-0117890
46	POL00117063	Complaint Review and Mediation Scheme - Paper from Post Office to Assist Second Sight (Version 2)	POL-0117897
47	POL00102236	Email from Belinda Crowe to Alisdair Cameron, Mark Davies, Jane MacLeod and others. Re: "Catch up call with Second Sight".	POL-0101819
48	POL00102245	Email from Chris Aujard to Belinda Crowe, Alisdair Cameron, Mark Davies and others. Re: "Catch up call with Second Sight: Confidential and Privileged".	POL-0101828
49	POL00102280	Email chain involving Ron Warmington, Ian Henderson, Janet Walker and others. Re: "Post Office Legal issues".	POL-0101863
50	POL00022382	Post Office Initial complaint review and mediation scheme report	POL-0018861
51	POL00102373	Email from Ron Warmington to Mediation. FW: Urgent - Post Office	POL-0101956
52	UKGI00003789	Letter from Paula Vennells to Jo Swinson MP re Second Sight Mediation Scheme	UKGI014603-001
53	POL00102395	Email from Mark R Davies to Paula Vennells, Alisdair Cameron, Neil Hayward and others - Re: Sparrow	POL-0101978
54	POL00029849	Initial Complaint Review Mediation Scheme: Second Sight Briefing Report - Part Two	POL-0026331
55	POL00102594	Letter from Paula Vennells to The Rt Hon James Arbuthnot MP re: reply to letter dated 18 March 2015 discussing disclosure of second sight documents in reinvestigations	POL-0102177
56	POL00103327	Email chain from Rob Houghton to Paula Vennells; Jane MacLeod; Rodric Williams, and others, re: Litigation - relevant tweet.	POL-0102910
57	POL00103328	Email from Rodric Williams to Paula Vennells; Jane MacLeod; Angela Van Den Bogerd; Rob Houghton, re: Litigation - relevant tweet.	POL-0102911
58	POL00030160	Initial Complaint Review and Mediation Scheme Briefing Report - Part Two prepared by Second Sight	POL-0026642
59	POL00043353	Post Office Complaint Review and Mediation Scheme Report	POL-0039835
60		Email chain from Joel Durston to Joel	

	POL00104202	Durston re: FW: Post Office Limited - "Horizon" Demonstration	POL-0103785
61	UKGI00000018	POL response to Second Sight briefing report - Part Two as part of the Complaint Review and Mediation Scheme	VIS00000979
62	POL00000213	Engagement letter of Ron Warmington & Ian Henderson in relation to Initial Complaint Review & Mediation Scheme	VIS00001187
63	POL00000218	Raising Concerns with Horizon	VIS00001192
64	POL00004439	Initial Complaint Review and Mediation Scheme - Briefing Report - Part One - Prepared by Second Sight	VIS00005507
65	POL00090358	Complaint Review and Mediation Scheme (Chronology and Supporting Documents) File 2 of 5 from April 2013 to October 2015	POL-0087327
66	POL00006355	Review on behalf of the Chairman of Post Office Ltd concerning the steps taken in response to various complaints made by sub-postmasters	POL-0017623