

Witness Name: Tim McCormack
Statement No: WITN11100100
Dated: 19 April 2024

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF TIM MCCORMACK

I, **TIMOTHY JAMES MCCORMACK**, will say as follows.

INTRODUCTION

1. I was formerly a subpostmaster (SPMR) in Scotland. I have been asked by the Inquiry to provide a Witness Statement pursuant to Rule 9 of the Inquiry Rules 2006.
2. The Inquiry has provided me with a great number of documents to consider and has asked me to provide a narrative account of my dealings and correspondence with POL and others in relation to bugs, errors and defects in the Horizon system.
3. I was assisted in drafting this witness statement by my legal representatives at Hodge Jones & Allen Ltd.

BACKGROUND

4. The Inquiry has requested that I set out my professional career background

and first involvement with POL.

5. I studied Marine Engineering at Glasgow College of Nautical Studies and was employed by Ben Line Ltd as an Engineering Officer until I was made redundant in 1982. I used part of my redundancy payment to buy my first personal computer and taught myself how to program.
6. From 1982 to 1992 I moved to South Africa and was employed within the IT Industry until I formed my own company, High Technology Systems which specialised in providing bespoke software and networking solutions to high profile companies such as De Beers. During that time I enrolled in several courses including at Unisa (RSA version of Open University) where I studied accounting.
7. I returned to the UK in 1992 and was an IT Consultant (mostly with Citibank where I was responsible for Credit Risk Technology throughout the CEEMEA region). I was later employed by Misys and Abbey National Treasury services as a Senior Business Consultant in Credit Risk Systems.
8. In 2004 my wife and I purchased a small shop, cafe and post office in the Highlands of Scotland (Foyers on the banks of Loch Ness) where I was the SPMR until 2010. In 2010 we purchased a larger post office in the Scottish Borders and my wife was appointed as the SPMR but we ran the branch together. In 2016 we exited Post Office under the Network Transformation program.
9. From 2016 to 2020 I owned a small newsagents in Coldstream and am now retired.
10. In 2010 my wife and I purchased Duns Post Office which was a 3 counter operation and produced an income of over £60k per annum. Horizon Online

had just been installed at the branch and we received one week's training from the outgoing SPMR. 2010 was also significant in that it introduced to the Network, the project known as Network Transformation. I was convinced from the start that this project would be detrimental to all existing SPMRs and as a result I became involved in social media as a critic of the proposals.

11. I have never been a member of the NFSP but as they provided free membership for 6 months to my wife I was able to attend some NFSP meetings as her representative in the Scottish Borders. I was perhaps the only person at these meetings who was prepared to be vocal in my opposition to the proposed changes.

12. I was subsequently banned from attending meetings and from the NFSP online forum which at one stage was entirely shut down by George Thomson as a result of my posting information that should have been made available to all SPMRs but the NFSP had chosen to keep confidential.

13. It is difficult to recall when I first started to take an interest in events leading to the scandal but I can recall my first contact with Alan Bates was in 2014 when I advised him of an error in Horizon that had occurred at my branch and which led to me interacting directly with Fujitsu at Bracknell in order to trace the source.

14. This error has never been mentioned before as far as I am aware but as it would have had little or no impact on branch accounts the effect of it is of little relevance. Some of the detail is now of significance I believe.

15. The problem manifested itself by allowing 2 counters in a branch to use different exchange rates for currency transactions. The differential would in most cases have reflected only the movement in the overnight exchange rates

but perhaps on occasion it could have been more serious and there could have been a significant variation in rates on different counters.

16. I contacted the Horizon Help Desk about this and subsequently entered into phone conversations with a Fujitsu engineer in Bracknell who I believe was called Steve Page. I provided him with documentary and photographic proof of the problem occurring. He discovered the error was as a result of a counter not refreshing its data from a table held on the master counter. That table contained the currency exchange rates and was linked to the currency rate window display system that many but not all branches had. It is an example of Horizon having the ability to change data in branches remotely without the SPMR having knowledge of it and which affected the branch accounts (but not in a way that induced any financial risk to the SMPR). The only people who would have been financially affected by this error were POL's own customers who would receive a favourable or unfavourable exchange rate depending on which counter they exchanged currency at.

17. A second error occurred at Duns at some stage and I believe I assisted Steve Page again in locating and working out what the problem was. The details and dates are vague and it certainly did not affect branch accounts. It was to do with the Card Reader installed at branches at the time and the firmware on these prevented certain card types from being used and I think an update to the firmware caused major problems and I was one of the first to report it.

18. There were also procedural errors (in my opinion) that were introduced to the network and I took the opportunity when it arose to point these out to POL management and in doing so suggested improvements. One of these was to do with the introduction of Mail Segregation performance targets which led to

a large volume of correspondence with POL noted in some of the documents the Inquiry has provided me with [POL00144438, POL00298740].

19. This led to me being asked to work on a pilot scheme for a tablet based help system for SPMRs, the details of which I cannot recall, and eventually correspondence with Gayle Peacock of POL [WITN11100110].

20. In her oral testimony before the Inquiry Gayle Peacock referred to an alleged abusive phone call I made to her on a Saturday afternoon although I think it was her that called me. I recall the conversation but not the day (October 2013) and it certainly became heated after she blatantly lied to me. She could not understand how I knew the truth behind 'her decision'. I was not concerned about not being on the Forum but was angry about being lied to. I can say that that was the date when my attitude towards POL Management changed completely. If she felt my language was abusive then I apologise to her but in return I would accept an apology for the lies.

CORRESPONDING WITH POL

21. The inquiry invited me to reflect on the approach I took to my correspondence with POL over the years.

22. My intent from the very start has been to be helpful to POL although the form it took changed over the years. Up until perhaps 2013 I don't think anyone in POL could disagree with that assertion but there came a point where it was clear that the people I was dealing with in POL were not the brightest kids in the block and senior management seemed blissfully unaware of the problems with Horizon that were being encountered by the network on a daily basis. Perhaps my interactions on Social Media generated more information about bugs, errors and defects than they were being told about. My approach then

evolved into contacting senior management directly to make them aware of the problems whether or not they understood the technical details behind them.

23. Shortly after the Horizon verdict in the GLO (perhaps even before that) I was researching Malicious Prosecution cases and was made aware of the genuine defence of defendants in such cases that they believed the evidence they had at the time to be true. That influenced me to direct some of my correspondence with Senior POL executives to point out their legal duties, their standing as Public Officers and their financial obligations in order that they would find it difficult to rely on 'not being aware of' or 'believed it be true at the time'.

24. As my frustration grew sadly the language I used in such correspondence degenerated for which I am sorry as at times it may have crossed the line into personal abuse. As internal correspondence disclosed to me reveals, that had the effect of my assertions not being taken seriously by some [POL00234092].

25. I might also point out that I made it a point not to reveal everything I knew about problems I reported to POL. I hoped that they would investigate these matters for themselves to find out what was missing.

26. From reviewing all of my correspondence with POL over the years and now seeing the internal discussions that this correspondence generated it is abundantly clear that the mindset of POL Executives as to the reliability of Horizon prevented them, and prevents them now, from being able to see the real problems. The Postage Labels Error problem highlights this.

POSTAGE LABELS ERROR PROBLEM

27. With regard to the Postage Labels Error up until I received the disclosure

from the Inquiry I hadn't given this error that I encountered at Duns much thought other than it highlighted the ineptness of Angela Van-Den-Bogerd. Now I discover it generated a lot of internal discussion [POL00101809], even a report from Gareth Jenkins [POL00220125], before it was ultimately dropped as being a possible error. To be fair, even Second Sight and Alan Bates were not too interested in it as it would only generate small, relatively insignificant shortages to SPMRs on a very infrequent basis. But as a study in how badly POL and Fujitsu investigated these errors it is a perfect example.

28. The effect of the error was clear and unmistakable to the SPMR. It was a bug in the system of that there is no doubt supported by photographic evidence and an overwhelming positive result in a poll of SPMRs asking whether or not it had affected them.
29. Horizon provided the SPMR the ability to produce postage labels of the same value in bulk up to a maximum quantity of 10. Occasionally the system would not produce the requested amount while indicating on the stack that all requested labels had been printed. I think I explain the problem clearly with suggested solutions in the email chain at POL00150592.
30. There could have been and most likely were 2 reasons for this happening. One that a label already printed could have been re-inserted and overprinted and secondly that a system error had occurred perhaps in Horizon but also in the printer or interface to it. A third reason could also have been a software glitch in Horizon itself but to be fair even I discounted this.
31. Both Gareth Jenkins in his report and Peter Prior-Mills, a Lean Consultant/Business Analyst in POL, in POL00220151 completely overlook the fact that a significant piece of hardware in the Horizon system, the receipt

printer, could be causing a financial loss to SPMRs.

32. As it happens I had some experience with that particular Epson Receipt printer as I owned one for my EPOS system and programmed it to do various functions including printing a Bitmap image. It was also connected to the Horizon system by a serial cable interface that can be unreliable particularly with magnetic field interference (hence the cables used are usually shielded).
33. Post Office did take a greater interest in the financial aspects of the failure of the system to print a label for which the SPMR would stand the loss while both POL and RMG would gain financially from the SPMR making good the loss. However in the end it appears they did nothing about it.
34. Angela Van-Den-Bogerd and Rod Ismay investigated whether or not there were many reports of this error occurring on the Help Desk logs [POL00107144]. This was a topic of my phone call discussion with Angela Van-Den-Bogerd and I recall her saying that there was no opportunity for call log operators to log such an event or link it to previous calls. I found this strange as this was 2014 and call centre software that could deal with new issues was being widely used. I told her I had written such a system for Caltex, a major oil company in South Africa back in the early nineties.
35. The fact is that for such a small discrepancy (the cost of a label) it was not worth the time and effort of a SPMR to go through the process of reporting it to the Help Desk. Anybody who had previously reported it to the Help Desk and not got anywhere were unlikely to have bothered trying again.
36. POL therefore had no way of knowing how prevalent a problem this was. Therefore my suggestion, which I did a rough costing at approx £20k to ask all SPMRs to print off 10 labels using the bulk printing option would have

perhaps been the only way to prove it.

37. The most annoying aspect of it to me personally was that Angela Van-Den-Bogerd took this to her Branch User Forum and 2 people in it (out of 5) mentioned they had come across it. I know this because one of the people was a friend who reported it back to me. Angela Van-Den-Bogerd reported back to me as well but in her version it was only one person, the NFSP rep from Northern Ireland, who suggested that it probably was because she had inserted a previously printed label and it was overprinted so she, the SPMR, was prepared to accept the loss as user error.

38. It was at this point that I recognised Angela Van-Den-Bogerd was not very good at her job and if I was going to get anywhere I would have to raise it further which I did in an email to Moya Greene suggesting RMG were gaining financially from SPMR losses [POL00107144].

39. All this occurred over Christmas and January 2014-2015 and POL's investigations were probably more rigorous than usual given the media focus on Horizon reliability. I do not think though that this prevented any thought of raising the issue with the network and asking SPMRs if they have been affected by the label printing error.

40. Nor did media focus have any bearing on their complete lack of investigation into a possible hardware or software fault being to blame. Gareth Jenkins' report did not look at that possibility at all although you might say that asking Gareth Jenkins for such a report was an investigation into this.

41. In POL00150592 a 'Litigation Lawyer' for POL, Christopher Ingles, states in his penultimate paragraph "It is entirely reasonable for POL to consider that the circumstances described of by Mr McC are not occurring". He follows that

by quoting from the Theft Act 1968.

42. It follows then, in Christopher Ingles professional opinion, that if it was unreasonable for POL to consider that my assertions were correct, that POL would be liable under the Theft Act as I had made clear in earlier correspondence.

43. Perhaps worth remembering then that in a poll of 5 SPMRs at a branch user forum, Angela Van-Den-Bogerd was made aware, completely independently from me that this was occurring in other branches.

44. I would therefore attach some significance to the many people this particular report from Christopher Ingles was forwarded to.

45. As part of the discussion around the labels problem, in POL00219911, Peter Prior-Mills, POL Business Analyst, states "the nature of Horizon and its transactions would suggest that any fault would be consistently present". That is representative of a mindset that is partly responsible for this whole mess. The ignorance surrounding Intermittent Errors in Computer Systems is widespread in POL perhaps even omnipresent. I wrote an article for Electronic Evidence about this in relation to Seema Misra's trial [WITN11100111].

ACKNOWLEDGMENTS

46. I am acutely aware that I am not a claimant and was not affected by the scandal and can make no comment on how these poor people might feel or what compensation they deserve. If I have ever lapsed from that then I apologise to all or any of the claimants who take offence.

47. While this witness statement refers to the documents disclosed by the Inquiry I have received there was substantial background to my actions based on the acquaintances I had made over the years. The most important phone call I

ever received I think was from Michael Rudkin. It was he who added the missing link in my thoughts regarding the trust / blind faith in POL to provide the truth in response to what were at that time, unsubstantiated rumours regarding problems with Horizon. I was also in touch with Lee Castleton from an early date. Ron Warmington and Mark Baker were early correspondents too.

48. The barrister Stephen Mason and I discussed the issue of Electronic Evidence and he helped me write the previously mentioned article for his journal.

49. Surprisingly perhaps, given my interest in Seema Misra's case, I did not meet her until the Horizon Trial.

50. The internal response to FOI request of mine at POL00242536 is absurd. Every single person in the email chain is and probably remains oblivious to the main point that when potentially criminal behaviour within POL is highlighted POL themselves have a duty of care to report it to the relevant authorities i.e the police. As it happens I understand that this matter is currently under investigation by the police. I did try and tell them I suppose three years before Sir Peter Fraser commented on exactly the same piece of evidence.

51. The contents of an email to Tom Wechsler dated 1 July 2016 in POL00242940 is one of the most astonishing of all the documents the Inquiry has provided me with. It changes everything in relation to the various interpretations of the actions and behaviour of Paula Vennells. A year earlier (2015) Paula Vennells had sought the truth prior to a select committee hearing in what has become a rather well known chain of emails [PO00030098]. In December of 2018 when those emails were first made public I chose not to follow

mainstream interpretation of her email and wrote a blog about this [WITN11100112]. I think it is fair to say that had Paula Vennells appended the last line of this email to her original email in 2015 then the interpretation of the 2015 emails would have been similar to mine.

52. In an email dated 3 July 2016 Jane MacLeod, General Counsel intercedes to Tom Wechsler and tries to close down any further discussion on this topic with Paula Vennells “any help you can give on closing down further queries from Paula on this would be very helpful” [POL00242983]. Makes you wonder who was running the show at this stage and what Jane MacLeod and Tom Wechsler actually thought of Paula Vennells.

53. As long as the Inquiry has provided me with all the emails in this conversation and allowing for the fact that Tom Wechsler may have provided Paula Vennells with verbal responses to her questions, which is unlikely, it seems that Tom Wechsler made no attempt to respond directly to any of Paula Vennells’ four instructions [POL00242940]. That is damning of both Tom Wechsler and Paula Vennells. Paula Vennells demanded the complete truth but Tom Wechsler did not bother to look and Paula Vennells never followed up on her demand. As it turns out that happens to be a several hundred million pound mistake.

54. Having considered this email chain in relation to other evidence in the public domain (e.g. the Paula Vennells ‘I want the truth email’ as mentioned above) I get the impression that Paula Vennells’ direct reports were extremely wary of providing her with information that may have been contrary to her perceived assumption that Horizon was reliable, That is not to excuse Paula Vennells for not establishing the truth for herself. She employed these people and it was

clearly her responsibility to ensure they did their job.

55. I have been provided with a chain of emails at POL00021686 that originate from Andrew Parsons of Womble Bond Dickinson dated 15 February 2016. These appear to be internal emails from Second Sight and for the life of me I cannot understand why Andrew Parsons should have access to Second Sight private emails.

56. In POL00241070 Melanie Corfield contributes to an email discussion on how best to respond to a FOI I made directly to Tim Parker by email. POL's FOI Team have previously said "You will see that in response to his reference to a 'known errors log' we are saying that we do not hold the info as we do not recognise the term " Melanie Corfield's response "I think this is a better approach because although Mr McCormack asks for Known Error Log (which might well not exist by that name), the reference could mean 'events log' or 'issues log', the existence of which have been confirmed to a degree in correspondence with others (including Panorama)", suggests that she knows all about the Known Errors Log and the sensitivity of acknowledging its existence – despite the fact that it had been referenced in Seema Misra's trial. The eventual response to me [POL00025368] has omitted all mention of my requesting a copy of the Known Errors Log.

57. It is fair to say that POL were as obsessed about denying the existence of the Known Errors Log as I was in proving they knew all about it. One year later in another FOI asking for Known Error Log details [POL00024909] I set off a remarkable chain of internal POL emails which culminated in this rather startling admission from Andrew Parsons at POL00024897, "This approach also has the benefit of avoiding the pain of saying to TM that we were wrong

before.”

58. The draft copy of the response to my FOI request [POL00241067] reveals what I believe to be a dishonest answer that was withdrawn in the actual response which is in itself evidence that it was dishonest. It states “we do not recognise the terminology” referring to the ‘Known Errors Log’. This is surely a matter for the police to investigate under the terms of the Freedom of Information Act 2000.

59. The Inquiry should also look at an email dated 16 November 2016 some 7 months later with regard to another FOI request for the Known Errors Log, where Andrew Parsons states “even the phrase ‘known error’ could set hares racing” [POL00245938].

60. I had a phone call with Alisdair Cameron acting CEO of POL 24 June 2019. The introductory and follow up emails between myself and Alisdair Cameron are self-explanatory and I have no concerns with his notes on our conversation [POL00277366].

61. I personally have been aware, through social media, of errors in Remittance Processing, where the branch either sends or receives cash to and from POL Cash Centres for many years – certainly as far back as 2013. There is a great significance in these types of errors as they are capable of producing losses and gains in branches for very large amounts.

62. I have been provided with a chain of emails that resulted from my call with Alisdair Cameron and I think the conclusions that can be drawn from these are highly significant [POL00163614]. I note the response from Kim Abbotts to Alisdair Cameron 27 June 2019 [POL00277535] if only to highlight the significance of what is revealed here. She reports that there are 5 to 6

incidents of this error happening every day and it seems it first became apparent on the 25 January 2019. A later report suggests up to 10 per day and it appears that Alisdair Cameron and the entire senior management team were unaware of this error until I informed Alisdair Cameron directly [POL00278014].

63. In a further email in this chain [POL00277549] from Kim Abbotts she responds to a question from Rob Houghton who I believe was Chief Information Officer at the time and left the business quite suddenly after these emails. Kim Abbotts says in response to Rob Houghton's question about what the worst case scenario for this error would be "if they don't call and the control to pick them up fails, they would have a discrepancy for the difference."

64. This error has been in situ for 6 months during which the Horizon trial has been taking place. Not only that this very type of error is being responded to by POL in their closing statement to the Horizon Trial at the very date of this email. This is read by among others Ben Foat and Angela Van-Den-Bogerd [POL00277549].

65. In a follow up email from me to Alisdair Cameron [POL00277748] I wrote about a potential problem with the Rem error should an assistant have remmed in the pouch and found an excess of say £5k and the assistant took it leaving no trace of a discrepancy at the branch. Applying POL's approach to recovering the REM discrepancy would in this instance always generate a loss to the SPMR however the SPMR could quite rightly claim and depend on the assistant's version of events that what was accepted on Horizon was what was received. POL would have no evidence to support their claim against the SPMR other than circumstantial evidence in that they would have to provide

evidence that 10 or so branches everyday for the last 6 months were experiencing the same error. It could be an explanation of why there were a few branches where there were unrecovered REM discrepancies.

66. This highlights the possibility that as a result of any computer errors generating a gain to the branch, should an assistant be responsible for completing the daily balance and noticing a significant gain takes the cash for themselves, this would result in a significant unexplainable loss to the branch should the error be later corrected by POL and or Fujitsu.

67. This error also highlights what I deem to be an intermittent error that could, and in this case did, affect random branches throughout the network at any given time. If it could affect any node in the network, then it was most certainly also classed as a systemic bug.

68. The error appears to have started in January 2019 most likely as a result of a software update. An important point for the Inquiry is to note that this error may NOT be a Horizon error as it is linked to two independent computer systems. One that monitors Cash in Transit and the other being Horizon. If it was a software update to the Cash in Transit system that caused errors in branch accounts on Horizon then that is extremely significant.

69. It does however appear from the documentation I was provided with that Fujitsu identified the error and fixed it within days of being told about it [POL00278014]. However it should be noted here I think that 3 years after these events of 2019 Ron Warmington and I were invited by POL to visit Birmingham Cash Centre as a result of similar errors being seen in the network.

70. It is highly significant that this chain of emails suggests that, while the error

with ordinary REMS was being picked up and corrected by junior staff since the error was first noticed in January 2019, it appears that it was only as a result of my intervention that POL noticed that the error also affected Bureau Remittances [POL00277535, POL00278014, POL00277549, POL00277549, POL00277748].

71. On 4 July 2019 I drew Alisdair Cameron's attention to the fact that POL's closing statement in the Horizon Trial directly related to similar REM problems in the past [POL00278009]. This led to the relevant passages from the closing statement being circulated to which I can see no response [POL00278013].

72. In [POL00278014] Ben Cooke sends an update on 4 July 2019 to a large email list which I presume is POL's executive team regarding the original bug appended to his report of 28 June 2019. In it he notifies the team of the Bureau REM problem which resulted in at least 31 out of 33 errors not being picked up by the system. If this error had been in existence since January 2019 I can only presume that 31 SPMRs had not reported a gain from Bureau Remittances at their branch which they were perfectly entitled to keep according to their contract.

73. This might be a significant statistic in that it could show that when a computer error results in a gain to a SPMR without the SPMR being aware of it being a computer error then the effect of the error goes unreported because the SPMR is perfectly entitled to keep the gain for his own benefit. How many Horizon errors went unreported and undetected because of this no one will ever know.

74. It is my understanding that as early as June 2019, settlement negotiations between the two parties in the GLO were underway. One has to wonder what impact, revelation of these two errors might have had on negotiations let alone

the findings of Justice Fraser.

75. At POL00277848 Andrew Parsons reviews in 2019 my email to Paula Vennells from 2015 that was mentioned in the GLO. He was correct in identifying that it was to do with Dalmellington. The details I did not supply at that time were that I had been asked by Calum Greenhow for help with a SPMR who was being pursued for a shortfall at his branch that was created in identical circumstances to the Dalmellington bug. I also did not point out that the original shortfall had arisen prior to the fix being put in place. I have asked Calum Greenhow repeatedly over the years to reveal who the SPMR in question was so I could check with them directly what the outcome was. Calum Greenhow has never responded.

76. At POL00277977 Rodric Williams produces a summary of the Seema Misra trial at the request of Alisdair Cameron. This is in 2019 some 9 years after the trial yet nothing has changed. There is no attempt at a fresh look given that POL would have possibly been far more aware of Horizon problems than they were back then. It is probably my greatest regret in all of this horrible saga that I did not manage to convince POL to at least sit down with me and hear what I had to say about the trial. I got so close with Alisdair Cameron but not close enough.

77. On or around 2016 I was sent a large amount of paper copies of documents relating to Horizon and the period following rollout in the early 2000s. These came from John Beswick, a former SPMR who was IRRELEVANT. Other than the documents I subsequently photographed [WITN11100101], I appear to have lost the remainder. However I clearly recall, and appear to have quoted from in correspondence with Tim Parker, a document which I

believe to be the minutes of an NFSP Executive Committee meeting. I stated in that email to Tim Parker "as early as 2000, from NFSP Executive committee minutes, they adopted POL's approach to criticism of the system saying that to publicly decry the reliability of Horizon would be to put at jeopardy the public's trust in the Post Office network".

78. By late 2015 I had come into contact with the barrister Stephen Mason who was promoting discussion of the use of electronic evidence in Court. Stephen Mason obtained and published in his online journal, the transcript of Seema Misra's trial.

79. Since then I have taken a keen interest in Seema Misra's case and I am pleased to say that Seema Misra, her husband Davinder Misra and I are now very good friends.

80. Sometime between 2015 and prior to Seema Misra obtaining legal representation from Aria Grace Law, I made contact with the CCRC on her behalf and provided them with my research and opinions. At some stage I obtained copies of the prosecution files used in her original trial including internal POL emails. My study of these files has led to observations that the Inquiry may not be aware of.

81. On the very first day of the trial, Gareth Jenkins appeared in court with a new set of previously undisclosed Horizon Data. These were the NT Event Logs for a certain period during Seema Misra's tenure of West Byfleet Post Office. These became important evidence during the trial in establishing that a previously discovered bug in Horizon known as the Callendar Square bug had, according to the prosecution, *not* occurred at West Byfleet during that period in question. This is Data that not even POL, let alone Seema Misra had access

to prior to the trial.

82. The Inquiry will be aware that according to Fujitsu the Callendar Square Horizon Bug was 'discovered' in 2005 and ultimately 'fixed' by Fujitsu/Escher in 2006, but Mr Justice Fraser made a finding of fact that the Callendar Square bug remained in the system until 2010 and the introduction of Horizon Online.

83. In order to try to establish that this error had not occurred in the West Byfleet branch, Gareth Jenkins had to produce the NT Event Logs. What he could not and did not produce was a document to say that Fujitsu had undertaken a network wide search for the interval preceding the fix of the bug to ensure that the bug had not affected any branch that had not reported it and of course had not suffered any financial loss as a result.

84. It appears from oral evidence already submitted to the inquiry (from Stephen Parker questioned by Flora Page) that Fujitsu were in fact monitoring NT Event Logs on a daily basis for, at least, hard disk failures of the type that caused the Callendar Square bug. This is also revealed in the call logs from the West Byfleet branch shortly after Seema Misra resigned her contract in 2008 that I will mention later in this statement.

85. Prior to Seema Misra's trial beginning, the defence team had requested further disclosure which was denied by POL and led to an Abuse of Process submission to the court. In reply the prosecution produced a Response to Abuse paper dated 7 March 2010 [POL00054346] which made the claim that if "there was a continuing problem with the Horizon system at West Byfleet, Seema Misra should have been keenly aware of it at the time it was occurring."

86. Later in the same document the prosecution state: *With an expert eye the material is not difficult to analyse. In a morning's work the Crown's expert,*

Gareth Jenkins, was able to analyse all failed credit card transactions and, to his mind at least, refute Professor McLachlan's theories on that score.

87. This suggests that without an 'expert eye' it would be difficult to analyse this data.

88. I also refer to Paragraphs 7 and 8 of the Prosecution response to the Abuse Paper [POL00054346], which refer to the costs of producing data. It is not clear who was to pay the £20,000 mentioned, nor is it clear who carried the cost of providing the additional disclosure that Gareth Jenkins brought to court on the first day of the trial.

89. On 14 January 2008, POL appointed Vipin Vasarmy as the interim SPMR at Seema Misra's former branch at West Byfleet. Under cross examination during Seema Misra's trial he was asked "Were there any trivial problems?". He replied "The only trivial problems we had were with the printers but nothing with the actual base unit or the monitors".

90. According to the internal POL prosecution files, that is not true. I attach to this statement a copy of a document from those files at [WITN11100103], which shows that on 2 April 2008, West Byfleet had a Base Unit Fault which was diagnosed as a 'bad block'. This is exactly the root of the problem indicative of the Callendar Square bug. The base unit was replaced in what was described in the call log as a "critical event".

91. It appears from this extract from the West Byfleet call log that identification of the "bad block" was pre-emptive by Fujitsu and that Fujitsu were still monitoring all NT Event logs in 2008 for such occurrences. I do not understand why Gareth Jenkins failed to use this as evidence that the Callendar Square Bug had not occurred at West Byfleet during Seema Misra's tenure, nor why

he failed to explain to the court why Fujitsu thought it still necessary to be carrying out these checks after Fujitsu assured the court that the Callendar Square Bug had been fixed.

92. I have no knowledge of whether or not the details of this "critical event" were disclosed to the defence team.

93. During Seema Misra's trial, the witness Andy Dunks provided in his witness statement what can only be described as a 'summarised' version of the West Byfleet Call Logs [WITN11100104]. There is one call of particular interest which Andy Dunks summarised as: "*29. Thu 23 February 2006 08:59 Call E-0602230104 annetee nbsc - pm states that she has losses every week in two stock units Resolution: Fri 03 March 2006 13:55 Call Close by David Dawe: pm was getting discrepancy's ssc have investigated and advised that the NBSC take a 2nd look at this as the office stock units appear to be in a mess. Outcome SSC team advice that call be passed back to NBSC for further investigation.*" The full call log for the same call was revealed in the GLO, and subsequently in a FOI request from me to POL and is attached to this statement [WITN11100105].

94. In this full version of the call log it is revealed that Fujitsu Employee Anne Chambers investigated this particular call and her comments as recorded include "*I have checked very carefully and can see no indication that the continuing discrepancies are due to a system problem. I have not been able to pin down discrepancies to individual days or stock units because the branch does not seem to be operating in a particularly organised manner*". This statement requires consideration. If discrepancies cannot be "pinned down to individual days" then even an expert like Anne Chambers could never find the

root cause whether computer error or otherwise. Anne Chambers was willing to look for a “system problem”, indicating either she was looking for a manifestation of a known error (at that time) or she was aware that system problems were a source of errors in branch accounts.

95. From the transcript of Seema Misra's trial, the Prosecution Barrister Warwick Tatford takes Andy Dunks to various extracts from the summary of calls Andy Dunks provided in his witness statement including that of 23 Feb 2006 in which there was no reference to Anne Chambers looking for a system error.

96. I have since provided the Metropolitan Police with details of Andy Dunks' submission to the court.

97. Again, I do not know whether or not the full call logs were disclosed to the defence for Seema Misra.

98. The documents provided to me by the Inquiry are generally related to my interaction with POL over the years and the internal discussions and actions these interactions generated. It is a recurring theme that since 2015 when I first read the transcript of the trial I have pressed POL at every opportunity to re-examine the transcript in the hope they would see what were/are in my opinion significant faults in the prosecution case. In 2015 I had only the transcript and my knowledge of computer systems as well as being a SPMR to rely on. My initial analysis, which I still have and is sadly prescient of future revelations, suggested to me that Seema Misra was either a victim of theft by assistants, and/or losses created by user error, and/or losses created by bugs. Given the eventual total discrepancy at her branch that had accumulated over the years I did not consider that a single computer error could be to blame. I do not and have never believed that Seema Misra stole a single penny from

her branch. At the time of her audit and under the terms of her contract with POL I believe she may have been in debt to POL but certainly not criminally liable to them.

99. Since 2015 I have obtained more and more evidence to support my original thesis and the overturning of her conviction by the appeal court supports my findings.
100. My constant references to Seema Misra's trial led to Paula Vennells asking for more information about the trial (denied I believe by her General Counsel and Rodric Williams) and then her successor Alisdair Cameron. At some point this led to Simon Clarke producing a brief on the trial in which he declares that in producing the brief he has relied solely on the transcript just as I had done in 2015.
101. The conundrum that the Inquiry may like to address is why do two people, one a lawyer and one a former SPMR with IT experience come to two completely disparate conclusions from the same evidence – the transcript. Why was the lawyer wrong in his assertions and the former SPMR correct?
102. The question I ask myself is, could I sit down with Simon Clarke and convince him he was wrong? Is the mindset so established that nothing I show him will change it.
103. In November 2015 I became aware of The Dalmellington Bug and wrote an article [POL00234921].
104. As the actual bug and its effects are well documented I will stick to additional thoughts and evidence on what transpired there.
105. I never provided POL with all the information I had about certain topics. With Dalmellington I kept from them the fact that, having obtained Fujitsu's

- explanation of how the bug manifested itself (user timeout) we tested that theory on an identical set of Horizon equipment and could not repeat the error.
106. It has therefore always been my belief that Fujitsu did not find the cause of the error and probably in my opinion inserted code to trap the error when it occurred. This belief is further substantiated by a document [POL00322166] provided to me in disclosure that indicates several similar events occurring within days of the Dalmellington incident suggesting that some unlikely trigger caused the error to become more widespread.
107. The same document [POL00322166] states that less than 500 branches could be affected because it only affects outreaches. It goes on to say that 'in reality there have been VERY FEW INSTANCES because it involves a number of actions in a particular sequence. Very few instances in the writer's mind equates to 5 in the last 3 months alone however closer analysis shows 4 of these 5 events happening within days of each other as a result of a process that each SPMR has carried out successfully hundreds of times before.
108. The Inquiry should look closely at this document [POL00322166] and the response to each of the 5 affected branches from the NBSC and note the different advice given. I am extremely concerned in particular about the advice given to the Kinlochleven branch which may or may not be the branch Calum Greenhow talked to me about. If Kinlochleven followed that advice without further assistance they would have incurred a loss in their accounts that may only have come to light many months later.
109. In addition, the document is a perfect illustration of the failings of the NBSC in not recording these REM errors as extremely serious and linking them to a

Knowledge Base so that quick identification of similar errors could be grouped together and escalated [POL00322166].

110. It should be noted that the Dalmellington SPMR had performed the same task many many times before and many times afterwards before the 'fix' was implemented without further manifestations.
111. The Dalmellington bug was discovered in late 2015. I was part of a small group that identified the bug from a social media post by the Dalmellington SPMR and I subsequently produced a report on our findings as well as a blog post I published on the website www.wordpress.com which I brought to the attention of Paula Vennells. I a copy of this blog post is attached [WITN11100102].
112. As a result of our findings, Computer Weekly ran an article on the bug which led to POL requesting from Fujitsu an investigation to determine the extent of the problem and the number of branches affected. Fujitsu prepared a presentation to POL (I do not know who the attendees of that presentation were) about the bug which stated that they found the bug had been known by POL since 2010 and allegedly fixed in 2010 and again in 2011 but had re-occurred a further 31 times since then. POL had failed to report the bug to Fujitsu between 2011 and 2015.
113. Fujitsu informed us and I assume POL as well of their understanding of what had caused the Dalmellington Bug and how they intended to 'fix' it. From an IT perspective it is noteworthy that this fix did not include a change to the database structure to ensure that no duplicate records could be inserted (e.g. set the database field attributes to unique and indexed)
114. I do find it astonishing the failure of anybody at POL to read what has been presented to them and not question the contents as evidenced in an email

from Pete Newsome of Fujitsu in relation to the history of the Dalmellington bug [FUJ00085967]. In this email it is highlighted that this error occurred 63 times following the release of HNGx in 2010 and in January 2011 a 'fix' was applied. The VERY next line says that in 2011 8 further incidents were reported and then it goes on to report several instances each year until 2015.

115. Then the last line is laughable. A fix will be applied in Jan 2016 no further occurrences have occurred so daily monitoring has stopped. Duplicate pouches continued to present problems to POL thereafter and probably to this day all fixable by one small change to a single attribute of a field in a database.

FREEDOM OF INFORMATION REQUESTS

116. Over the years I have made repeated requests to POL to publish a list of known errors in the system (see below section on FOI requests). To this day, they have steadfastly refused to do so.
117. Since 2013 I have been submitting FOI requests to POL under my own name and that of a pseudonym Tony Williams. I originally used the Tony Williams pseudonym as I was then an owner of a Post Office branch and did not want to attract attention to myself or my wife who was the SPMR.
118. I have compiled a spreadsheet of all of my FOIs and correspondence at WITN11100106.
119. I have noted below the very unhelpful delaying tactics of the FOI team at POL. The reasons given for non-disclosure of information which included, commercial, legal and cost excuses. There is also the matter of the use of redactions and I note one particular recent example which gives cause for

concern as to why POL felt it necessary to redact a specific date.

120. POL001 [WITN11100106 – page 4] was a request where I asked for a snapshot of cash balances declared by the network on a randomly selected day. I was surprised to receive a detailed response and it indicated that the recording of cash balances by branches was problematic to say the least showing that only 708 branches actually recorded balances that corresponded with what Horizon said they should be. Of note is a subsequent telephone conversation I had with Angela Van-Den-Bogerd where we discussed this issue and we both agreed that those 708 branches would be subject to more scrutiny than the others that reported discrepancies.
121. POL002 [WITN11100106 – page 7] was a request to BIS which asked for copies of all the correspondence between BIS and Paula Vennells between 1 June 2012 and 31 May 2013.
122. POL007 [WITN11100106 – page 61] was a request for statistics of requests to POL's FOI team - I recall submitting this as I was beginning to notice from other FOI requests to POL that they were only being responded to on the last statutory day for response.
123. POL008 [WITN11100106 – page 63] is probably unrelated to the Inquiry but was an example of the obfuscation provided by POL to me. This request ultimately led to a successful complaint to the ICO.
124. POL009 [WITN11100106 – page 65] was linked to my interest in the failure of the Network Transformation project.
125. POL010 [WITN11100106 – page 67] was an enquiry into the funding of the NFSP.
126. POL011 [WITN11100106 – page 69] related to the funding of the NFSP but

was a good example of the obfuscation in the reply by POL to a simple request.

127. In POL012 [WITN11100106 – page 71] the question was “Has the Board of Directors and Senior Management of Post Office Ltd ever been made aware of ANY fault within the software or hardware of their Horizon System that would have impacted in ANY way on the accuracy of the accounts of any post office?” A simple question that they refused to answer after requesting an extension period.
128. POL013 [WITN11100106 – page 73] was an enquiry to BIS regarding funding of the NFSP.
129. POL014 [WITN11100106 – page 82] was a request to POL for details of contingency amounts set aside to cover eventual compensation for convicted SPMRs. This was dated 11 July 2014 and may have been the first request for such information. It was refused.
130. POL015 [WITN11100106 – page 83] is of no interest to the Inquiry.
131. POL016 [WITN11100106 – page 85] is of no interest to the Inquiry other than a simple request not being replied to until the last possible day.
132. POL017 [WITN11100106 – page 87] was a protracted ‘discussion’ with POL regarding the Memorandum of Understanding that was meant to have been signed by POL with the NFSP.
133. POL018 [WITN11100106 – page 90] was an unusually swift response to a further request on contingencies set aside for future payments to affected SPMRs. It would be interesting to find out who the Information Rights team contacted to get a response to this or the original FOI.
134. POL019 [WITN11100106 – page 91] is the Memorandum of Understanding

with the NFSP again and POL refusing access to it.

135. POL020 [WITN11100106 – page 92] was a simple request that was refused even though POL admit they have the information.
136. POL021 [WITN11100106 – page 94] was a request to BIS that failed due to website problems.
137. POL023 [WITN11100106 – page 100] was a request linked to the Dalmellington bug. POL and Fujitsu had told us in private emails that this release would fix the problem which occurred in 2015, but not until 2016. In the interim they refused to inform the network that the bug still existed in the system. This relates to the Seema Misra trial where it was wrongly stated that any computer error would be spotted by the operator.
138. POL024 [WITN11100106 – page 103] was a request for financial information - I took the opportunity to forecast a minimum of £300m contingency that should be set aside by POL for compensation payments (this in January 2016).
139. POL025 [WITN11100106 – page 105] was a request for numbers of prosecutions that was only partially replied to. I seem to recall at this time I was helping Nick Wallis to establish these numbers. The numbers provided in this response did not match with what was eventually revealed by Nick Wallis in an article he wrote dated 25 May 2020 [WITN11100107].
140. POL026 [WITN11100106 – page 107] was a request aimed at pointing out to POL in a public way that I had come across a Transaction Correction credit that had been sent to an office where the SPMR had moved on. The new SPMR queried this with the Help Desk and was told to keep the “money”.
141. POL027 [WITN11100106 – page 109] was a reply from POL with regard to

my questions on suspense accounts. While they refused to answer how much was posted from suspense to income statement on commercial grounds, they did acknowledge that they had done so. That in turn leads to questions about management bonus payments and possible fraud.

142. POL028 [WITN11100106 – page 111] was a reply from POL regarding disciplinary procedures in place in POL operated “Crown” branches. It should be noted that at some stage it was discovered that £2m annually was being written off by POL as losses in Crown Offices.
143. POL029 [WITN11100106 – page 113] was a request for additional financial information about the suspense accounts which was refused on commercial grounds. I requested an internal review but that was turned down as well.
144. POL030 [WITN11100106 – page 115] was a request for the amount POL was spending on defending the GLO. Understandably turned down and of course this information was made public at a later date. By this time POL were now routinely taking the full statutory timeframe in which to respond to requests.
145. POL031 [WITN11100106 – page 118] was a request to the Ministry of Defence based on a press report that there was a significant security problem with Windows NT and asking them if they had advised POL of this. POL used Windows NT for Horizon up until the introduction of HOLx. Support for NT was discontinued by Microsoft in 2004 and I later came across a website maintained by third parties that listed known errors in NT found after the last Microsoft release including very significant security issues.
146. POL032 [WITN11100106 – page 120] was about internal disciplinary procedures for POL employees. I took a snapshot of the wording of the job advert which clearly indicates the use of a “consequences policy”, but POL

denied having such a document.

147. POL033 [WITN11100106 – page 121] was a request to establish under which authority POL undertook Private Prosecutions. Of note here is their access to the Police National Computer of which I have seen an audit of POL's use of it.
148. POL034 [WITN11100106 – page 126] is a request to UKGI. I had pointed out to POL that they had perhaps misused State Aid / Working Capital Loan to help fund the GLO and they had to repay the money to BEIS.
149. POL035 [WITN11100106 – page 129] was linked to POL034 - I asked both UKGI and POL much the same question.
150. POL036 [WITN11100106 – page 131] was a request I made in 2019, by which time I had become used to POL's refusal to discuss the Known Errors Log and I did not expect a response to this one, but this is part of the history of requests to POL for the publication of the Known Errors Log and/or release notes for patches/upgrades to Horizon. It would be interesting to know who was giving these responses to POL's FOI team from within POL as it was clearly a concerted effort not to provide any detail on the KEL.
151. POL037 [WITN11100106 – page 133] was a request that produced the full call log which had been summarised by Andy Dunks in Seema Misra's trial (see above). The document has since been provided to the Met Police as part of their investigation into suspected criminal behaviour during the prosecution of Seema Misra by POL representatives. I was surprised to receive it and it was the turning point in communication with POL's FOI team as they seemed to become more forthcoming in their responses.
152. POL038 [WITN11100106 – page 137] was a request for documentation between UKGI and POL regarding POL's funding arrangements. One of the

documents provided which should have been almost fully redacted was not.

It confirms the extraordinary amount of money that POL had available to them to fight the GLO (£237m) and they were prepared to use it.

153. POL039 [WITN11100106 – page 164] was similar to a request in 2013 which was successful, but BEIS this time decided not to comply.
154. POL040 [WITN11100106 – page p166] was a request for POL board minutes from 1999 and after a lengthy wait I was provided with them.
155. POL041 [WITN11100106 – page 224] was to find out how did, and how do POL now, locate former SPMRs in order that transaction corrections issued long after they have sold their branch are returned to them. The recent example of POL's search for possible HSS claimants indicates that they use credit scoring agencies such as Equifax to locate them but in the instance I report in this FOI, no effort was taken to locate the former SPMR.
156. POL042 [WITN11100106 – page 227] was in relation to Misconduct in Public Office. This FOI was to raise the responsibility to report crime, and to consider whether the POL management are Public Officers.
157. POL043 [WITN11100106 – page 229] was in relation to a Settlement of Mediation Case. A former SPMR and member of the JFSA contacted me and told me of the payment to the widow of a former SPMR, Martin Griffiths, and the way that it was handled by Angela Van-Den-Bogerd.
158. POL044 [WITN11100106 – page 232] is where I was pursuing POL to acknowledge and publish at least some of the Known Errors Log. The reasons they gave for refusal were intriguing and changed over time.
159. POL045 [WITN11100106 – page 235] was where I was again pushing POL to publish the Known Errors Log and asking for a review of their reasons not to

publish it, which in this instance included “legal privilege”.

160. POL046 [WITN11100106 – page 237] was in relation to a post on social media which showed a screenshot of a Horizon Error Code and the poster asked what it meant. Nobody on the forum knew what it was so I challenged POL via this FOI to publish a list of these error codes.
161. POL047 [WITN11100106 – page 239] was in relation to Cash Remittances. There is ample evidence from many SPMRs almost on a daily basis on social media to this very day that the system of Cash Remittances is flawed. I have continued to pursue POL on this topic which led to Ron Warmington from Second Sight and I being invited to visit the POL Cash Centre in Birmingham earlier this year, but still we have not full disclosure from POL on this topic, including statistics and error logs for both gains and losses.
162. POL048 was in relation to the Investigation of a discrepancy at Wallasey Post Office by a specially appointed team. This is an example of an FOI where the reasons for non-disclosure could be questionable.
163. POL049 concerned the Known Errors Log. Even after Justice Fraser handed down his decision on the Horizon trial POL were still refusing to publish the Known Errors Log. The reply to this particular FOI is particularly disingenuous, and brings into question the FOI team and the role they played.
164. POL050 [WITN11100106 – page 241] concerned the Dalmellington Bug. I was contacted in June 2016 by Calum Greenhow of the NFSP (then a branch secretary) to assist him with a problem he had with a NFSP member who was being pursued by POL for a debt which from my understanding from the conversation I had with Calum Greenhow was identical to the circumstances of the Dalmellington bug and that according to Calum Greenhow the debt had

been incurred in 2015. This might mean that despite what POL and Fujitsu had stated in court, POL had not in fact resolved the issue nor informed their managers what to look out for. I have repeatedly asked Calum Greenhow for details of the branch involved so I could cross check if Fujitsu had actually found the error in that branch.

165. POL051 [WITN11100106 – page 244] was a request to which there is a change in the tone of the response, which was after the GLO.
166. POL052 [WITN11100106 – page 248] concerned the Dalmellington Bug. An email released under FOI suggests the Dalmellington Bug was raised at quite a high level. The unredacted version would be interesting.
167. POL053/054 [WITN11100106 – page 250] these are 2 requests which are linked and are quite recent. These may be helpful to the inquiry to show who knew what and when with regard to the extent of issues with Horizon. There are 2 outstanding points that still need to be investigated further a) why was the “Former Agents Debt Recovery Team” involved in deciding to have the entry linked to Seema Misra removed as a result of her confiscation hearing being decided? And b) why was the day and month on one of the emails redacted and not the year when all other emails did not have their dates redacted? It seems likely that the spreadsheet had been in use for some considerable time prior to even the initial discussions of appointing Forensic Accountants.
168. POL055 [WITN11100106 – page p278] is a very recent example of POL hiding behind the cost limit for FOI requests. It is also worthy to note that the comments quoted from the Swift Review indicate a “system wide error|”, which is something Paula Vennells went to great lengths to deny existed and POL

did not want the JFSA team to establish in court. I checked with the JFSA expert witness, Jason Coyne, if he had found this bug in the data provided to him and he said that he had never seen it mentioned before.

Statement of Truth

I believe the content of this statement to be true.

Signed:

GRO

Tim McCormack

Dated: ¹⁹ April 2024

Index to first witness statement of Tim McCormack

<u>No.</u>	<u>URN</u>	<u>Document Description</u>	<u>Control Number</u>
1.	POL00144438	Email from Tim McCormack to Paula Vennells re Mail Segregation Problem	POL-BSFF-0003575
2.	POL00298740	Email chain from Tim McCormack to Kevin Gilliland, Paul Vennells and others re Mail Segregation	POL-BSFF-0136790
3.	WITN11100110	Email chain from Tim McCormack to Gayle Peacock and others re Branch User Forum	WITN11100110
4.	POL00234092	Email chain from Melanie Corfield to Rodric Williams, Mark Underwood and Patrick Bourke and others	POL-BSFF-0072155
5.	POL00101809	Email chain from Tim McCormack to Paula Vennells and others.	POL-0101392
6.	POL00220125	Gareth Jenkins report on Label Printing	POL-BSFF-0058188
7.	POL00150592	Email chain from Christopher Ingles to Angela Van-Den-Bogerd and others re Tim McCormack Feedback	POL-BSFF-0009704
8.	POL00220151	Email chain from Peter Prior-Mills to Angela Van-Den-Bogerd and others	POL-BSFF-0058214
9.	POL00107144	Email chain from Peter Prior-Mills to Angela Van-Den-Bogerd re Spoiling postage labels	POL-0105452
10.	POL00150592	Email chain from Chistopher Ingles to Angela Van-Den-Bogerd, Rodric Williams and others re Tim McCormack feedback	POL-BSFF-0009704
11.	POL00219911	Email chain from Peter Prior-Mills to Angela Van-Den-Bogerd re New Year Update – This has now got quite serious	POL-BSFF-0057974
12.	WITN11100111	Article by Tim McCormack, The Post Office Horizon system and Seema Misra	WITN11100111

13.	POL00242536	Email chain from Patrick Bourke to Melanie Corfield and others re Freedom of Information request – Misconduct in Public Office	POL-BSFF-0080599
14.	POL00242940	Email chain from Paula Vennells to Tom Wechsler	POL-BSFF-0081003
15.	POL00030098	Email chain from Newsome Pete to Satchithananda Muhunda re Update Q1: Urgent Action: Accessing Horizon	POL-0026580
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23.	POL00024897	Email chain from Andrew Parsons to Kerry Moodie, Rodric Williams, Patrick Bourke and others re Tim McCormack FOIA Response Draft	POL-0021376
24.	POL00241067	Letter from Martin Humphreys to Tim McCormack re Freedom of Information Request	POL-BSFF-0079130

25.	POL00245938	Email chain from Andrew Parsons to Rodric Williams re BAU response	POL-BSFF-0084001
26.	POL00277366	Email chain from Alisdair Cameron to Rob Houghton, Kim Abbotts, Ben Foat and others re Another computer error	POL-BSFF-0115429
27.	POL00163614	Email chain from Rodric Williams to Mark Davies, Patrick Pourke, Melanie Corfield and others re McCormack - background	POL-0151817
28.	POL00277535	Email chain from Kim Abbotts to Alisdair Cameron, Rob Houghton, Ben Foat and others re Another computer error	POL-BSFF-0115598
29.	POL00278014	Email chain from Ben Cooke to Alisdair Cameron, Rob Houghton and others re Branch Impacting Incidents Summary	POL-BSFF-0116077
30.	POL00277549	Email chain from Alisdair Cameron to Kim Abbotts, Rob Houghton, Ben Foat and others re Another Computer error	POL-BSFF-0115612
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33.	POL00278013	Extract from PO HIT Closing Submission	POL-BSFF-0116076
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36.	POL00277977	R v Seema Misra briefing note on trial by Rodric Williams	POL-BSFF-0116040
37.	WITN11100101	Documents received from John Beswick, former subpostmaster	WITN11100101
38.	POL00054346	R v Seema Misra prosecution response to defence abuse of process skeleton argument	POL00054346
39.	WITN11100103	POL prosecution files - West Byfleet Call Log dated 2 April 2008	WITN11100103
40.	WITN11100104	Mr Andy Dunks witness statement provided during the trial of R v Seema Misra	WITN11100104
41.	WITN11100105	Full log regarding helpdesk call by Mrs Seema Misra E-0602230104 dated 23 February 2006	WITN11100105
42.	POL00234921	Article by Tim McCormack, The Error in Horizon	POL-BSFF-0072984
43.	POL00322166	Draft Response – CWU and alleged Horizon Errors	POL-BSFF-0160216
44.	WITN11100102	Blogpost on the Dalmellington bug by Tim McCormack dated 10 November 2015	WITN11100102
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