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Witness Name: Elizabeth Jane Kennedy

Statement No.: WITN11830100

Dated: 10th December 2024

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF ELIZABETH JANE KENNEDY

I, Elizabeth Jane Kennedy, will say as follows

INTRODUCTION

1. I am a Principal Public Prosecutor in the High Court & International Section of the Public Prosecution Service for Northern Ireland (hereafter 'PPSNI'). 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 28th October 2024 (the "**Request**").

BACKGROUND

2. I hold an LLB degree from Queens University, Belfast. I completed my professional training and was admitted to the Roll as a solicitor by the Law Society of Northern Ireland in 1999. I worked in private practice in criminal

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law before joining the PPSNI in 2012 as a Public Prosecutor. In 2024 I became a Principal Public Prosecutor in the High Court and International Section.

PPSNI INSTITUTIONAL AND INDIVIDUAL KNOWLEDGE OF HORIZON

ISSUES

3. The PPSNI have been asked to set out when it first became institutionally aware of any bugs, errors and defects in Post Office Limited's (hereinafter 'POL') computer system, Horizon, with the potential to affect transaction data and/or create balancing problems in a Post Office branch and/or impact upon the reliability of the Horizon data being used in support of prosecutions of subpostmasters, their staff or POL employees. The PPSNI first became **institutionally** aware of issues with the POL computer system, Horizon in June of 2020.
 - (i) This was communicated to the PPSNI by way of an email dated 18th June 2020 from Peters & Peters to Ms Catherine McGalie, in her capacity as a Principal Public Prosecutor in the Fraud and Departmental Section of the PPSNI. Ms McGalie escalated this through her line manager Mr Graham Cardwell to senior management in the PPSNI. A decision was taken that as this related to Court of Appeal cases and CCRC referrals this matter would be dealt with by Mr James McLernon in the High Court and International Section of the

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PPSNI under the supervision of the Assistant Director for the section,
Ms Eilis McGrath.

- (ii) I exhibit a copy of the email dated 18th June 2020 with the spreadsheet of cases attached thereto (**WITN11830102** and **WITN11830101**).

- (iii) The PPSNI responded to this communication by identifying the cases involved using the details provided to identify as many corresponding PPSNI files as possible. The PPSNI asked the PSNI to conduct searches for material they might hold. We used proactive searches to try and identify any other N.I. cases affected by Horizon. The search functionality on the PPSNI case management system is limited but the PPSNI were able to identify additional cases not on the original POL spreadsheet by searching for a specific witness, for example POL investigators such as Ms Suzanne Winters. A preliminary review of identified files was carried out by the relevant Assistant Directors in the regional sections and the Fraud and Departmental section of the PPSNI where these cases were dealt with previously. Thereafter the files were passed to Mr McLernon for further action.

Peters & Peters, who act on behalf of POL, assisted in providing up-to-date contact details for people potentially affected by Horizon and the PPSNI worked closely with the Criminal Case Review Commission. The PPSNI then sent pro forma disclosure letters to every person for whom we had contact details. This letter gave a brief summary of the previous prosecution brought against them, summarized the English High Court

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and Court of Appeal judgments on Horizon deficiencies and provided web links to the full judgments. It advised on the process in Northern Ireland of how to challenge a conviction by way of an appeal. The letter also signposted them to the CCRC website and advised each person to obtain their own independent legal advice.

4. The PPSNI been asked whether, before 2013, any PPSNI employees, such as Public Prosecutors or other staff members, became aware of any issues (whether understood at the time to be caused by bugs, errors or defects or not) within the Horizon system with the potential to affect transaction data and/or create balancing problems in a Post Office branch and/or impact upon the reliability of the Horizon data being used in support of prosecutions of subpostmasters, their staff or Post Office employees. Based on the documents available, before 2013, the PPSNI were not aware of any issues with the Horizon system with the potential to affect the reliability of the Horizon data. It appears, from the documents available, that in three cases reviewed, the defendant, or their representatives, raised issues with the Horizon data during the course of their prosecution. These are the cases of Mr Alan McLaughlin, Ms Maureen McKelvey and Mrs Patricia Fegan. Mrs Fegan's case related to allegations from 2014. Mr McLaughlin and Mrs McKelvey's cases are referred to in more detail in the following paragraphs.

In addressing the question of when the PPSNI became institutionally aware of issues with the Horizon system and the question of whether any PPSNI employees were ware of such issues before 2013, you have asked that

OFFICIAL

OFFICIAL

consideration is given to specific documents. I will address each of these in turn:

- i. *Letter from Charles McKay to Mr R McCarey dated 6 November 2004 at pages 4-5 (PNI00000001_036)*. This correspondence relates to the prosecution of Ms McKelvey and the PPSNI would refer you to the witness statement provided by Mr Kevin Shiels (WITN10580100), and his subsequent testimony to the Inquiry in respect of this matter. Mr Shiels has dealt with this matter in his testimony.
- ii. *Letter from Madden & Finucane Lawyers to Director of Public Prosecutions regarding Mr Alan McLaughlin dated 9 September 2022 at (AMCL00000001)*. This correspondence is specifically dealt with at paragraph 6 below.
- iii. *Post Office email chain from January 2020 at (POL00292987)*. The PPSNI were not party to this correspondence and this email chain does not refer to the PPSNI. We are therefore unable to confirm whether this email was sent to PPSNI and do not have a record of this. We are therefore unable to assist the Inquiry in this regard.
- iv. *Letter from Amy Quirk (Senior Security Intelligence Manager, POL) dated 11 December 2015 at (POL00333548)*. This letter appears to be directed to the CPS, not PPSNI. On reviewing the documentation on the identified files, the PPSNI have no record of receiving a copy of this

OFFICIAL

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correspondence at any stage and are unable to assist the Inquiry in this regard.

- v. *Post Office email chain from January 2020 at (POL00293011)*. The PPSNI was not party to this correspondence. The email queries if “Horizon update letters” were sent to Northern Ireland. On reviewing the documentation on the identified files, the PPSNI have no record of receiving any such correspondence and again are unable to assist the Inquiry in this regard.
- vi. *Email exchange between Mr Simon Hutchinson and PSNI dated July 2016 at (POL00333558)*. The PPSNI were not a party to this email exchange. On reviewing the documentation in the identified files, it has been established that this may relate to the prosecution of Ms Liza Coleman, as Constable Gordon of the PSNI was the Investigating Officer on that file and it related to a prosecution in 2016. This prosecution related to the Defendant’s fraudulent use of a pre-paid credit card, the Sub-postmistress contacted police to state that the defendant was using a credit card in the Post office branch, requesting the card be “swiped” to withdraw money, she was handed the cash “withdrawn” but due to an error the money was in fact being credited to the credit card account. It is unclear from the evidence provided if this was an error in the Horizon system or an error by the staff in not recognizing this was a pre-paid credit card. Subsequently, the Directing Officer raised enquiries with the Investigating Officer as to the amounts

OFFICIAL

OFFICIAL

taken as he could not reconcile the loss claimed by POL, of over £10,000 and the amount the Defendant accepted she had gained, approximately £4,000 to £5,000. The documents provided by the credit card company did not match those figures provided by the POL. In response to the Directing Officer's enquiry, he was provided further evidence from the credit card company but ultimately the Directing Officer noted, "In view of the difficulty in reconciling the Post Office data in respect of the use of the Mastercard with the Mastercard data, a direction is being issued to prosecute Liza Coleman on Indictment for a GENERAL DEFICIENCY FRAUD OFFENCE which will encompass all her dishonesty" . There is no record on the file of the email exchange referred to above.

- vii. *Letter from Amy Quirk (Senior Security Intelligence Manager) titled 'Disclosure for PPS' dated 1 June 2016 at (POL00333553).* The PPSNI have no record of receiving said correspondence. The letter is not addressed to any specific PPSNI office, department or member of staff and therefore would be incredibly difficult to trace.
- viii. *Letter from Inspector J McCleary to Public Prosecution Service dated 16 August 2004 and accompanying documents at (PNI00000001_071).* This correspondence relates to the prosecution of Ms McKelvey and the PPSNI would refer you to the witness statement provided by Mr Kevin Shiels and his subsequent testimony to the Inquiry in which this is dealt with fully.

OFFICIAL

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- ix. *Email exchange between Mr Jarnail Singh, Ms Suzanne Winter and Mr Ernie Waterworth and others dated September 2013 at (POL00125050).* The PPSNI were not a party to this correspondence and there are no records to suggest that this was sent to PPSNI. We are therefore unable to assist the Inquiry in this regard.
- x. *Email from Constable Alan Gordon to Mr Simon Hutchinson dated 20 June 2016 at (POL00333554).* I would refer you to paragraph vi above. PPSNI were not a party to this correspondence and neither this correspondence, nor the reply, have been located in this file. It cannot be confirmed whether this correspondence was received in PPSNI, and we are unable to assist the Inquiry in this regard.
5. The PPSNI has been asked a number of questions in relation to a suggestion that Mr Ernie Waterworth (a legal advisor instructed by Northern Ireland POL Security Team in 2013) was going to meet with the “DPP to establish if police can be taken out of the handing over process”. In respect of this, I can confirm the following information:
- i. A letter was sent by email by Mr Ernie Waterworth on 10 April 2013 to PPSNI requesting a meeting with the then PPSNI Deputy Director, Ms Pamela Atchinson, who has since retired. I have exhibited this email correspondence **WITN11830103**. On reviewing the remaining archives, the PPSNI were able to locate a brief email, dated 4 June 2013, which appears to confirm that the meeting took place with Mr Stephen Herron, then Assistant Director of the Fraud and Departmental Section, not with

OFFICIAL

OFFICIAL

the Deputy Director. I have exhibited a copy of this email correspondence at **WITN11830104**.

- ii. This email confirms the outcome of the meeting was an agreement that as McCartan Turkington and Breen were retained by POL they would forward complaints and investigation files directly to the PPSNI and not via the PSNI.
- iii. A further email exchange was located, dated 17 January 2014, from Mr Stephon Herron, then Senior Assistant Director in the PPSNI, to PPSNI colleagues, referring to the meeting with Mr Waterworth. This details that the meeting with Mr Waterworth took place in May 2013 and related to the manner of submission of POL files and the possibility of drawing up an SLA (Service Level Agreement). This email correspondence confirms that the SLA was not completed. I have exhibited a copy of said email at **WITN11830105**.

On searching the archives, we have located a report from the Criminal Justice Inspection Northern Ireland, dated July 2008. A copy of said report is exhibited at **WITN11830106**. This report is an inspection of the Royal Mail Group Crime Investigation Function and at point 4.6 there is a recommendation that POL cases be “submitted by a more direct method”. It seems likely that this was the basis for the discussions between Mr Waterworth and Mr Herron at the meeting detailed above.

OFFICIAL

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A letter dated 24 March 2009, from the PSNI to a Mr William Boyd, Royal Mail Investigations, has also been located in the PPSNI archives. I have exhibited a copy at **WITN11830107**. This letter indicates that the PSNI wished to remove themselves from the process of passing files from Royal Mail to the PPSNI (then PPS) and for files to be submitted directly.

I can confirm that the suggested Service Level Agreement between PPSNI and POL was not finalised and there is no record of this having been agreed. PPSNI continued to receive POL files from PSNI after this date.

- iv. PPSNI have no record of any communication with Mr Waterworth specifically in relation to Mr Damian McCartan's case.
6. The PPSNI has been asked whether anyone from PPSNI attended a meeting in November 2004 as suggested by Mr Michael Madden (of Madden & Finucane Solicitors) and Mr Alan McLaughlin. The original file relating to the prosecution of Mr Alan McLaughlin was destroyed in accordance with the retention policy of the PPSNI in October 2008. There are therefore no records or documentation relating to a meeting in November 2004. The documents referred to do not identify the Prosecutor. The Directing Officer who took the decision to prosecute has retired and is not available to assist with this query. It is therefore not possible to confirm whether anyone from

OFFICIAL

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PPSNI attended such a meeting or to provide any details as to the discussions if this did take place.

7. The e-mail from Constable Gordon to Simon Hutchinson dated 1 July 2016 (**POL00333558**), does not contain any PPSNI file reference numbers, the name of any possible defendant, nor does it refer to any prosecutor by name to enable the relevant case file to be identified. As per paragraph 4(vi) above it is considered likely that this relates to the prosecution of Ms Liza Coleman. On reviewing the documents in our possession in respect of the prosecution of Ms Coleman, we have not discovered any documentation which would confirm that the discussions with the PSNI referred to in the email took place or what was discussed. There is no evidence to suggest that the email was shared with PPSNI, and we are therefore unable to assist the Inquiry in this regard. We are unable to clarify this with the case Directing Officer as they have retired. As set out in paragraph 4(vi) above, this case did not relate to the prosecution of a sub-postmaster or sub-postmistress, but rather to the fraudulent use of a pre-paid credit card by a member of the public.
8. The PPSNI has been asked whether it was ever made aware of the Second Sight and Helen Rose reports. Based on the documents held by PPSNI there is nothing to suggest that PPSNI was at any stage made aware of the Second Sight and Helen Rose reports. No copies have been located.
9. The PPSNI has been asked questions in respect of the prosecution of POL cases between 2000 and 2013. I can confirm as follows:

OFFICIAL

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- i. The Horizon evidence presented to the PPSNI was normally in the form of transaction logs or print outs exhibited to statements provided by the POL investigators. The investigators normally included some paragraphs in their statements as to how the Horizon system operated, these were technical in nature, and then detailed the evidence obtained from the system and exhibited the relevant printouts.
 - ii. The extent to which the prosecution relied on this evidence varied depending on the facts and evidence in each individual case.
 - iii. The PPSNI had no reason to specifically interrogate the Horizon evidence and data.
 - iv. In each case the decision to prosecute was taken based on all available evidence and by applying the test for prosecution as detailed in the Code for Prosecutors. The test for prosecution is set out in full along with the relevant provisions of the Code for Prosecutors in the witness statement of Mr James McLernon, witness statement [WITN10280100]. A suspect is not put on their plea nor is a guilty plea accepted in any case before a decision is taken as to whether the test for prosecution is met.
10. The PPSNI has been asked whether it was ever made aware of the advices of Simon Clarke (**POL00113694** and **POL00006799**). On the documents reviewed, to the best of my knowledge, it does not appear that PPSNI have ever been made aware of the advices of Mr Simon Clarke. They do not

OFFICIAL

OFFICIAL

appear on any of the identified files and Mr Jennings is not listed as a witness on any of the identified files.

11. The PPSNI has been asked whether, in relation to prosecutions of POL cases relying upon Horizon evidence, PPSNI instructed any experts and/or asked POL to provide evidence/testimony relating to the Horizon IT system or the reliability of information extracted from it. As stated in paragraph 9 above, the POL files typically contained a statement from the investigator, giving a brief description of how Horizon operated, before detailing the specific evidence relied on. On the identified files, there is no evidence that the PPSNI ever instructed any experts or asked POL to provide evidence/testimony relating to the Horizon IT system or the reliability of information extracted from it. The witnesses, namely the investigators, may have been asked such questions in the course of giving their testimony, but PPSNI have no records of same.

12. The PPSNI has been asked a number of questions relating to paragraph 41 of Ms Suzanne Winter's statement (**WITN10400100**). Ms Winters does not detail any specific meetings or name any PPSNI representatives who attended said meetings. PPSNI would have raised typical queries with the PSNI investigating officer, who submitted the file, and possibly the POL investigators, where required. PPSNI may have held meetings where necessary in individual cases to clarify evidential queries but at all times retained independence as the prosecuting authority. It is not possible to identify whether any meeting as described by Ms Winters took place or

OFFICIAL

OFFICIAL

indeed which case this would have related to. An examination of the case files held has no record of any such meeting having taken place.

PPSNI Conduct of Prosecutions and Disclosure Obligations

13. The PPSNI has been asked to consider paragraph 39 of Ms Suzanne Winter's statement (**WITN10400100**) and advise whether it did/does have an agreed process or Memorandum of Understanding in relation to how Post Office cases were/are prosecuted. To the best of our knowledge, there has never been a Memorandum of Understanding or an SLA (Service Level Agreement) in relation to how Post Office cases were processed. The process is described in the earlier statement to the enquiry of Mr James McLernon, witness statement (**WITN10280100**), at paragraphs 24 to 30 therein. There was only one exception to this process in the identified files, this related to the prosecution of Mr Robert Dillon.

On a detailed review of the papers, it appears that this file was submitted to the PPSNI by McCartan, Turkington and Breen Solicitors on 24th May 2013. The investigation on this file was carried out entirely by POL and there was no PSNI involvement. This case is not a "Horizon" file, in that the prosecution did not rely on Horizon data. An unscheduled audit was carried out at the Post Office branch, this detected a discrepancy of approximately £12,000.00. The Sub-postmaster Mr Robert Dillon was contacted, and he confirmed on the phone that he had taken £12,000.00 in cash to pay for a car for his wife, as they had been in an accident the previous day. He confirmed he was still in possession of the cash and returned to the branch with £12,000.00 in cash

OFFICIAL

OFFICIAL

that day. Mr Dillon confirmed this account in interview and subsequently entered a guilty plea to the directed charges.

14. The PPSNI has been asked why it was not until 2020 that Horizon related cases were identified. As per paragraph 3 above, PPSNI did not become institutionally aware of issues with the computer system, Horizon until June of 2020. Prior to this, issues had only been raised in relation to the Horizon data in a small number of cases, namely the prosecutions of Mr Alan McLaughlin and Ms Maureen McKelvey, which are looked at in detail below, and in the case of Ms Patricia Fegan.

In the case of Ms Fegan, she specifically stated in interview that the computer system was to blame for the discrepancies in the accounts. The decision to prosecute was based on admissions made by Ms Fegan in relation to false accounting only, rather than relying on the Horizon data and this was not used in the prosecution. Prior to taking her decision as to prosecution, the Directing Officer on this file did raise a query with the Assistant Director of the Fraud and Departmental Section, Mr Ciaran McQuillan, and with other Senior Public Prosecutors as to whether there were any other prosecutions in Northern Ireland where the failures of the Horizon system were at issue, she was advised that they were not aware of any such files.

It appears that the PPSNI received relatively few prosecution files relating to POL. The cases were dealt with by individual prosecutors, working out of

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various offices throughout Northern Ireland and the challenges to Horizon evidence were case specific and did not give rise to a requirement to a review of all files received.

15. The PPSNI has been asked whether, once it became aware of relevant Horizon issues, POL made any suggestions as to the approach that PPSNI should take in relation to its Horizon cases (both open and closed). When the systemic issues in respect of Horizon evidence were brought to PPSNI attention, the approach followed is that described in Mr McLernon's witness statement to the Inquiry (**WITN10280100**), at paragraphs 31 to 33 as set out below for ease of reference:

"31. Going forward, PPS understands that the Post Office will continue to conduct their own internal investigations but where it becomes apparent that a criminal offence may have been committed the matter will be referred to Police at that early stage.

32. PPS understands that all statements provided by the Post Office in respect of 'legacy Horizon' or providing 'legacy Horizon' data now comes with a clear warning of the judicial findings that have been made about bugs, defects and errors. As at the date of signature of this statement, following inquiries with the Regional and Fraud sections of the PPSNI, we are not aware of any 'live' cases involving investigations which postdate the 'Horizon' issues coming to light.

OFFICIAL

OFFICIAL

33. There was a more recent case arising from a branch audit in 2019, initial audits were conducted by POL who then turned material over to PSNI who led the investigation and conducted a PACE interview. During the course of the investigation POL brought to the attention of the PSNI investigators that there were significant issues coming to light with the reliability of the 'Horizon' IT platform. In this case the PPSNI directing officer reviewed the file and directed 'no prosecution.' The file has therefore been closed."

16. The PPSNI has been asked whether, once it became aware of the Horizon issues, PPSNI's prosecution process changed in any way in relation to Post Office cases where Horizon was concerned. PPSNI prosecution process remains as previously described in Mr McLernon's witness statement to the Inquiry (**WITN10280100**), at paragraphs 4 to 23 therein.

At all times the test for prosecution is applied to each individual case in accordance with the Code for Prosecutors, and each individual case is assessed based on the evidence available and the individual factual matrix of each case.

17. The PPSNI has been asked to set out what the disclosure duties are for a prosecutor in Northern Ireland, if any, once a case has been finalised and how that duty is discharged in circumstances where the prosecutor may come to be aware of information that supported the convicted individual's case. As specifically referred to in Mr McLernon's witness statement

OFFICIAL

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(WITN10280100), at paragraphs 16 to 23, the disclosure duties for a prosecutor in Northern Ireland are found in the Criminal Procedure and Investigations Act 1996 (as amended) (hereafter 'CPIA'), the accompanying CPIA Code of Practice for NI (July 2005), the PPS Code for Prosecutors, the Attorney General's Guidelines on Disclosure of Unused Material in Criminal Proceedings (2013) and the PPS/PSNI Disclosure Manual (revised Jan 2015).

In particular, in relation to post conviction disclosure paragraph 72 of the Attorney General's Guidelines on disclosure states as follows:

"Where, after the conclusion of proceedings, material comes to light that might cast doubt upon the safety of the conviction, the prosecutor must consider disclosure of such material."

Further, the common law remains applicable, particularly outside of the scope of the CPIA, in relation to post-conviction disclosure (*R (on the application of Nunn) (Appellant) v Chief Constable of Suffolk Constabulary and another* [2014] UKSC 37). There are no specific guidelines on how that duty should be discharged as this would be tailored to the specific case.

18. The PPSNI has been asked whether it complied with its duty of disclosure in relation to Post Office cases affected by the Horizon system. Paragraph 3 (iii) above details how the PPSNI complied with the disclosure in relation to Post Office cases affected by the Horizon system.

OFFICIAL

OFFICIAL

19. The PPSNI has been asked whether it is aware of any circumstances in which PPSNI has continued to prosecute, or defend appeals by convicted subpostmasters, in Horizon cases after 2013. The appeals of Ms Fegan, Mr McLaughlin and Ms McKelvey were conceded at the outset. Mr Lee Williamson also lodged an appeal. This appeal was initially contested as it was not accepted that the case was a "Horizon" case on the evidence available. Following the enactment of the primary legislation five of the nine counts the Appellant was convicted of were automatically quashed. The remaining four (forgery) counts were not quashed by the legislation. After carefully reflecting on the new evidence in this case, in particular the Appellant's affidavit and the report from the IT expert instructed by the defence, PPSNI were satisfied there was a sufficient evidential basis on which to conclude this was a case in which the reliability of the Horizon system was an essential component of the original underlying prosecution case and PPSNI did not oppose the appeal on the remaining counts on the indictment.

Prosecution of Mr Alan McLaughlin

20. The PPSNI has been asked whether anyone from PPSNI saw the McClure Watters report in relation to Mr McLaughlin's case at the time of his prosecution. The original PPSNI file in relation to Mr McLaughlin was destroyed in 2008, in accordance with the PPSNI retention policy. Accordingly, there are no records to confirm whether anyone from the PPSNI

OFFICIAL

OFFICIAL

was provided with the report of McClure Watters (Chartered Accountants) (AMCL0000006) during the course of the initial prosecution.

As part of Mr McLaughlin's appeal, PPSNI were provided with an almost complete set of the prosecution papers in the appeal bundle lodged by representatives for Mr McLaughlin, and this included the aforementioned report. Instructed prosecution counsel noted in his skeleton argument to the Court of Appeal that:

"It is reasonable to assume, given the guilty pleas, that the defence report was served on the prosecution prior to trial, rather than held back. The report placed the reliability of the Horizon evidence in issue. That being the case, disclosure of relevant problems with that system was required. No such disclosure was provided."

On this basis the Appeal was conceded at the outset.

21. The Directing Officer for the PPSNI has retired and as the PPSNI file was destroyed, we are unable to confirm who saw the report, or any actions taken as a result.

22. PPSNI received a copy of the report as part of Mr McLaughlin's Appeal bundle.

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Prosecution of Ms Maureen McKelvey

23. The PPSNI has been asked a number of questions in relation to the prosecution of Ms Maureen McKelvey. I refer the Inquiry to the detailed witness statement of Mr Kevin Shiels and to his testimony to the Inquiry in respect of this prosecution.

Other matters

24. There are no other matters that the PPSNI consider the Chair of the Inquiry should be aware of.

Statement of Truth

I believe the content of this statement to be true.

Signed:

GRO

Dated:

10/12/2024

OFFICIAL

Index to First Witness Statement of Elizabeth Jane Kennedy

<u>No</u>	<u>URN</u>	<u>Document</u> Description	<u>Control Number</u>
1	WITN11830102	Email correspondence between William Green to Cathy McGalie, Nick Vamos and Rodric Williams re: Post Office Limited	WITN11830102
2	WITN11830101	List of Individuals that were prosecuted for false accounting / audit cash loss / theft	WITN11830101
3	PNI00000001_036	Letter from Charles McKay to Mr R McCarey dated 6 November 2004 at pages 4-5	VIS00013112_036
4	WITN10580100	Witness statement of Mr Kevin Shiels	WITN10580100
5	AMCL0000001	Letter from Madden & Finucane Lawyers to Director of Public Prosecutions regarding Mr Alan McLaughlin dated 9 September 2022	AMCL0000001
6	POL00292987	Post Office e-mail chain from January 2020	POL-BSFF-0131050
7	POL00333548	Letter from Amy Quirk (Senior Security Intelligence Manager, POL) dated 11 December 2015	POL-0180987

OFFICIAL

OFFICIAL

8	POL00293011	Post Office e-mail chain from January 2020	POL-BSFF-0131074
9	POL00333558	Email exchange between Mr Simon Hutchinson and PSNI dated July 2016	POL-0180998
10	POL00333553	Letter from Amy Quirk (Senior Security Intelligence Manager) titled 'Disclosure for PPS' dated 1 June 2016	POL-0180993
11	PNI00000001_071	Letter from J McCleery to PPS Belfast chambers regarding further documentation disclosure on R V Maureen McKelvey	VIS00013112_071
12	POL00125050	Email exchange between Mr Jarnail Singh, Ms Suzanne Winter and Mr Ernie Waterworth and others dated September 2013	POL-0131063
13	POL00333554	Email from Constable Alan Gordon to Mr Simon Hutchinson dated 20 June 2016	POL-0180994
14	WITN11830103	Letter sent from McCartan Turkington Breen on behalf of Post Office Limited to Deputy Director of Public Prosecutions of Department of the Director of Public	WITN11830103

OFFICIAL

		Prosecutions, Belfast.	
15	WITN11830104	Email correspondence between Marion Kemp and Stephen Herron regarding: meeting re Royal Mail files	WITN11830104
16	WITN11830105	Email correspondence re: Margaret Ruth Johnston	WITN11830105
17	WITN11830106	Criminal Justice Inspection - Royal Group, An Inspection of the Royal Mail Group Crime Investigations Functions	WITN11830106
18	WITN11830107	Letter from Chief Inspector, Ian Campbell on behalf of Northern Ireland Police to Mr William Boyd (Royal Mail Investigations).	WITN11830107
19	WITN10280100	Witness statement of Mr James McLernon	WITN10280100
20	POL00113694	Advice from Mr Simon Clarke (Barrister/Cartwright King) on the use of expert evidence relating to the integrity of the Fujitsu services Ltd Horizon System	POL-0112802
21	POL00006799	Advice on Disclosure and the Duty to Record and Retain Material	POL-0017591

OFFICIAL

22	WITN10400100	First Witness Statement of Suzanne Winter - WITN10400100	WITN10400100
23	AMCL0000006	Letter to John J Rice & Co from McClure Watters, RE Your client: Alan McLaughlin	AMCL0000006

OFFICIAL