

# OPUS 2

## INTERNATIONAL

Horizons Issues - Alan Bates & Others v Post Office Limited

Day 2

March 12, 2019

Opus 2 International - Official Court Reporters

Phone: 0203 008 6619

Email: [transcripts@opus2.com](mailto:transcripts@opus2.com)

Website: <https://www.opus2.com>

1 Tuesday, 12 March 2019  
 2 (10.30 am)  
 3 MR GREEN: May it please your Lordship. I have two things  
 4 for your Lordship before we begin with Mr Latif who is  
 5 sitting kindly waiting in Islamabad.  
 6 There is the physical bundle of claimants' witness  
 7 statements.  
 8 MR JUSTICE FRASER: Thank you.  
 9 MR GREEN: My Lord, the other thing is an answer to  
 10 your Lordship's question about whether we have a list of  
 11 the Callendar Square bugs.  
 12 MR JUSTICE FRASER: We can deal with that after Mr Latif.  
 13 We will deal with all of those things after Mr Latif.  
 14 MR GREEN: I'm most grateful.  
 15 Mr Latif, if we look at your witness statement on  
 16 the Opus screen {E1/1}, which hopefully --  
 17 MR JUSTICE FRASER: I don't think -- we haven't sworn this  
 18 witness yet.  
 19 MR GREEN: My Lord, no, I'm so sorry.  
 20 MR JUSTICE FRASER: Good morning, Mr Latif. We are just  
 21 going to administer either the oath or the affirmation.  
 22 Affirmation.  
 23 MR ADREES LATIF (affirmed)  
 24 MR JUSTICE FRASER: Just pausing there, the witness  
 25 obviously doesn't have a form of words in front of him

1

1 of the affirmation. I am content that that is  
 2 a sufficiently close affirmation for the purposes of  
 3 the court, unless either party wishes me to readminister  
 4 it -- now is your opportunity? No.  
 5 MR DRAPER: No, my Lord.  
 6 MR JUSTICE FRASER: Thank you, Mr Draper.  
 7 Mr Green, over to you.  
 8 Examination-in-chief by MR GREEN  
 9 MR GREEN: Mr Latif, on the Opus screen in front of you you  
 10 should be able to see a document which says "Amended  
 11 witness statement of Adrees Latif", can you see that?  
 12 A. Correct.  
 13 Q. And if we look at page 3 of that witness statement  
 14 {E1/1/3}, there's a signature there.  
 15 A. Yes, sir.  
 16 Q. Is that your signature?  
 17 A. Correct, that is my signature.  
 18 Q. And do you believe the contents of your witness  
 19 statement to be true?  
 20 A. I do.  
 21 Q. Would you wait there for a moment because counsel for  
 22 Post Office will have some questions to ask you.  
 23 A. That's correct, that's okay.  
 24 Cross-examination by MR DRAPER  
 25 MR DRAPER: Hello, Mr Latif. The witness statement you have

2

1 provided is a very short one so I want to first ask you  
 2 some questions by way of background about your branch.  
 3 A. Yes sir.  
 4 Q. Firstly, can you give some indication of the size of the  
 5 Caddington branch?  
 6 A. Caddington branch is situated in a village of about  
 7 12,000 people. It has two main counters and a third  
 8 combi-counter, so it is a three counter office.  
 9 Q. What do you mean, Mr Latif, by a combi-counter? Could  
 10 you explain that please?  
 11 A. A combi-counter is a counter that is open on the same  
 12 hours as the retail shop, so I have a post office at the  
 13 back of the premises where there is two main counters  
 14 and the third counter which is a combi-counter and it is  
 15 situated nearby the retail counter of the convenience  
 16 shop which I also operate. And that counter is open at  
 17 the same hours as the shop counter is open as well.  
 18 Q. Thank you.  
 19 A. So it is commonly known as out of hours counter.  
 20 Q. Yes. Thinking back to two dates specifically, July 2015  
 21 and January 2018, which are the dates of the two  
 22 problems you complain of in your statement, how many  
 23 Post Office staff members, your assistants, would  
 24 typically be working in the branch?  
 25 A. On those days there would be three members of staff:

3

1 two, including myself which is the third.  
 2 Q. If we could call up {F/1038.1/1} please. This is  
 3 a Post Office record, Mr Latif, of the assistants  
 4 registered in your branch. Can you look down those  
 5 please and confirm whether those indeed were the  
 6 assistants in your branch at the two dates that I have  
 7 just given to you?  
 8 A. I can. The first one is a Mrs Christine Helen Barnett,  
 9 the second one was a Mr Muhammad Rouman Tabassum.  
 10 Q. When you say first and second, what do you mean by that?  
 11 Are you talking about in order of importance as  
 12 assistants?  
 13 A. No, no, they are both manager's level. I'm talking  
 14 about on the list where you've got the names of my staff  
 15 on there, so Christine Helen Barnett and then  
 16 Rouman Tabassum.  
 17 Q. On the screen we have it here the first entry is  
 18 a Christine Fensome. Can you see that at the top of  
 19 your screen?  
 20 A. Yes.  
 21 Q. Counting down, just to confirm you are seeing exactly  
 22 the same document as I am, it is Christine Fensome, then  
 23 Christine Barnett, then Michael Brumwell, then  
 24 Muhammad Tabassum, then Robert Deacock and then  
 25 Tahir Shabir.

4

1 A. Correct, sir .  
 2 Q. And if you look down the far right-hand side of the  
 3 screen, are those to the best of your recollection the  
 4 Horizon user IDs for those assistants?  
 5 A. Yes, sir .  
 6 Q. It is not listed on here but am I right to say that your  
 7 user ID was MLA001?  
 8 A. That's not my user ID.  
 9 Q. Sorry, did you say that's not?  
 10 A. No.  
 11 Q. What then was your main user ID?  
 12 A. It's ALA001.  
 13 Q. Thank you.  
 14 A. So can I just repeat that, my Lord?  
 15 Q. I got it. I think you said ALA?  
 16 A. (Nods).  
 17 Q. 001?  
 18 A. Correct. Correct.  
 19 Q. And looking at the assistants that are still shown on  
 20 the screen, can you give any indication of how many  
 21 hours per week they would typically work, whether any of  
 22 them, for example, worked most of the week and others  
 23 were less frequent?  
 24 A. On an average week the (inaudible) work was 36 hours.  
 25 Each person.

1 Q. I think you may have told me this before, but just to  
 2 confirm, did any of these assistants have a higher  
 3 status than any of the others, any additional rights?  
 4 A. There's two of them and that is Mrs Christine Helen  
 5 Barnett and Muhammad Rouman Tabassum.  
 6 Q. In what respects were they more senior assistants?  
 7 A. Christine was a manager in the post office with me but  
 8 she used to work mainly in the post office and Muhammad  
 9 was also the shop manager as well. So he used to manage  
 10 the shop for me and the post office when I was not  
 11 there.  
 12 Q. Would it be right then that there were some tasks on  
 13 Horizon and in the post office more generally that  
 14 Christine Barnett could do because she was a manager but  
 15 your other assistants wouldn't have done?  
 16 A. I didn't quite understand that question. Can you please  
 17 repeat that.  
 18 Q. Of course. Were there any tasks in running the  
 19 Post Office branch that Ms Barnett could do or would do  
 20 for you that the other assistants wouldn't?  
 21 A. Mrs Barnett and Muhammad Rouman Tabassum were trying to  
 22 do the balancing procedures as well as myself. Some  
 23 staff would not know how to balance the office and when  
 24 I say "balance the office", as you may already be aware  
 25 that we have to reconcile at the office on a weekly

1 basis, so every Wednesday we would reconcile the office  
 2 and both Christine Helen Barnett and Muhammad  
 3 Rouman Tabassum were fully trained to do that if I was  
 4 not around.  
 5 Q. You say if you were not around. How common would it be  
 6 for you not to be in the branch on a given day?  
 7 A. It's very common. As you know, Post Office ran various  
 8 training sessions so you were expected to attend those  
 9 and there could be holidays, there could be various  
 10 other reasons.  
 11 So can I just repeat, Christine Helen Barnett, she  
 12 used to work for the police so she is very, very  
 13 trusted. I trust her completely. And Muhammad  
 14 Rouman Tabassum is a very close friend of mine who has  
 15 been with me for a long time so these two were  
 16 completely trustworthy, honest, hard working and very  
 17 reliable .  
 18 Q. So it is fair to say you entrusted the operation of the  
 19 branch to one or other of those two people, you said  
 20 "quite frequently". Could you give any more specific  
 21 indication? Do you mean once a week, twice a week?  
 22 A. I tend to be there most days. Five days to six days  
 23 a week, so -- but sometimes I did take time off, so it  
 24 was infrequent but it did happen occasionally.  
 25 Q. Looking then at hours, I think you said that the hours

1 were strange, presumably you mean long, so might there  
 2 be times of day even on days when you were working in  
 3 the branch when you weren't there, say early in the  
 4 morning on are late in the evening?  
 5 A. Correct.  
 6 Q. How common an occurrence was that, Mr Latif?  
 7 A. Uncommon, but it could have happened, it does happen, it  
 8 did happen. I mean I could have had a meeting where  
 9 a customer has come in for a financial services product,  
 10 so I will take them to the room where we hold private  
 11 conversations so that means I'm away from a counter, so  
 12 yes, that does happen.  
 13 Q. I'm going to ask you some questions now about a stock  
 14 unit transfer for £2,000 that you describe in your  
 15 witness statement. You say that it was carried out in  
 16 or around July 2015; that's right, isn't it?  
 17 A. Correct, sir .  
 18 Q. Now, just to explain to you what I'm going to do, I'm  
 19 going to come on a bit later to tell you what  
 20 Post Office says happened, but because there is not much  
 21 detail in your witness statement I'm first going to take  
 22 you through your account of what happened and ask you  
 23 questions about that. Do you follow?  
 24 A. Okay, I do.  
 25 Q. And when I'm doing that it doesn't mean that Post Office

1 accepts as true the things that I'm exploring with you,  
 2 I'm just asking you questions about what you say.  
 3 A. I understand, sir.  
 4 Q. So you say at paragraph 6 of your witness statement  
 5 {E1/1/2} that the transfer was from the AA stock unit in  
 6 your branch to the SJ1 stock unit, is that right?  
 7 A. Correct.  
 8 Q. I suggest that you have made a small mistake there,  
 9 Mr Latif -- no criticism, but Post Office's records  
 10 suggest that there was a stock unit called SP1 but not  
 11 a stock unit called SJ1. Do you think that might be  
 12 right?  
 13 A. Correct.  
 14 Q. So you think it -- forgive me, it is my fault, my  
 15 question was unclear.  
 16 A. (Inaudible) can check my statement.  
 17 Q. Yes. It is paragraph 6, the first mention of SJ1, which  
 18 is the second page {E1/1/2}.  
 19 A. Yes.  
 20 Q. Do you accept that that's a small mistake?  
 21 A. That is a typo, sir, that should read SP1.  
 22 Q. Thank you.  
 23 Can you tell me anything about these two stock  
 24 units, so, for example, what was the AA stock unit? Was  
 25 it a specific counter?

9

1 A. Okay, the AA stock unit, sir, is the main stock unit  
 2 that's in the two counters that's behind the back of the  
 3 post office, okay? That's where the most interaction  
 4 happened during normal hours of operation, which are  
 5 between 9 and 5.30.  
 6 SP1 is the combi-counter that I referred to earlier  
 7 on. Combi-counter is open on the retail side of the  
 8 premises, okay, and it is adjacent to the shop retail  
 9 counter.  
 10 Q. And where was the cash for stock unit AA kept?  
 11 A. Behind the closed, locked doors of the main office.  
 12 Q. And what about the cash for stock unit SP1, where was  
 13 that kept?  
 14 A. SP1 had its own dedicated safe. It's a rolling deck  
 15 safe and how that works is it has got a cassette,  
 16 an (inaudible) cassette which is supplied by the  
 17 Post Office as a mandatory requirement of handling  
 18 stock, so the cash is kept in the RollerCash and a small  
 19 amount is kept in a flip draw which the Post Office  
 20 supplied to us for normally about one hour's worth of  
 21 operation in the flip top, and the rest of the cash is  
 22 kept in the roller deck safe which is below the flip top  
 23 safe.  
 24 Q. Thank you. So this transfer of £2,000 in or  
 25 around July 2015, is it right that the purpose of that

10

1 was to replenish the cash stocks in SP1 because it was  
 2 running low of cash?  
 3 A. Correct, sir.  
 4 Q. It might be useful to take you now to the statement of  
 5 one of Post Office's witnesses, Ms van den Bogerd. Her  
 6 statement is at {E2/5} please. Mr Latif, is this  
 7 a witness statement that you have seen before?  
 8 A. No.  
 9 Q. Okay, going to page 22 of this document please  
 10 {E2/5/22}, you see paragraphs 87 to 88 there towards the  
 11 bottom of the screen. Can I ask you to read  
 12 paragraph 87 and paragraph 88 and please indicate when  
 13 you need the page to be turned.  
 14 A. Okay. So paragraph 87?  
 15 Q. Yes, please, read it to yourself. No need to read it  
 16 out loud.  
 17 A. Okay.  
 18 So:  
 19 "If subpostmasters wish to move cash or stock  
 20 between stock units, there is a process which must be  
 21 followed. Firstly, the item which is being transferred  
 22 (in this case cash) must be transferred by the user via  
 23 Horizon using the back office function (transfer out)  
 24 from the outgoing stock unit. The cash must then be  
 25 physically removed from that particular stock unit.

11

1 Providing these two actions are completed, the stock  
 2 unit from where the cash is transferred should not show  
 3 a discrepancy."  
 4 Q. Thank you. If you stop there.  
 5 MR JUSTICE FRASER: Mr Draper, you are going to have to be  
 6 a bit more clear in how you either put questions or  
 7 express yourself, because I know that you said, rather  
 8 sotto voce, "Don't read it out loud"; the witness  
 9 obviously thought you had asked him to read it out loud.  
 10 MR DRAPER: Understood.  
 11 Mr Latif, that paragraph you have just read, that's  
 12 an accurate description of the process, isn't it?  
 13 A. Yes, sir.  
 14 Q. Can I ask to you read to yourself, not out loud,  
 15 paragraph 88 and tell us when you need the page to be  
 16 turned please.  
 17 A. Okay.  
 18 (Pause).  
 19 Next page please. {E2/5/23}.  
 20 (Pause).  
 21 Okay.  
 22 Q. Thank you. That's accurate as well, isn't it, Mr Latif?  
 23 A. It is, sir.  
 24 Q. It is probably now helpful to go to your witness  
 25 statement at {E1/1/2} and paragraph 7 please. Do you

12

1 have that in front of you now?  
 2 A. I do.  
 3 Q. I'm going to take you through it in stages to look to  
 4 add some more detail to the account that you give. I'm  
 5 going to ask you to confirm that each of the stages that  
 6 I describe is correct.  
 7 A. Okay.  
 8 Q. So first stage, you logged into stock unit AA and you  
 9 used the transfer out function, identifying the stock  
 10 unit SP1 to which you wanted to transfer the £2,000, is  
 11 that right?  
 12 A. Correct, sir.  
 13 Q. And when you did that the system printed out a transfer  
 14 out slip, is that right?  
 15 A. That is mandatory, yes.  
 16 Q. You say it is mandatory, is it automatic that the system  
 17 prints the slip?  
 18 A. It's automatic, there's nothing -- it's automatic,  
 19 there's nothing you can do about it, it happens  
 20 automatically.  
 21 Q. It's right, isn't it, that you could also choose to  
 22 print one? You could press "print" as well; that's  
 23 right, isn't it?  
 24 A. You could print an additional one, sir, if you need to.  
 25 Q. Thank you. Could you explain what you then do with the

13

1 transfer slip once it is printed out?  
 2 A. We file that with the paperwork from the office.  
 3 Q. It's right, isn't it, that you should sign the transfer  
 4 out slip and take it with you when you go to  
 5 transfer in?  
 6 A. Correct. Well, you also at the same time get the  
 7 transfer in slip from the receiving stock unit as well,  
 8 sir.  
 9 Q. Yes.  
 10 A. And sign -- date stamp both of them.  
 11 Q. Thank you. Looking at this specific transfer that  
 12 you're describing at paragraph 6 of your statement,  
 13 so far, describing the transfer out from stock unit AA,  
 14 everything had worked as it should have worked, is that  
 15 right?  
 16 A. Correct.  
 17 Q. You say you then moved over to stock unit SP1 to process  
 18 the transfer in, is that right?  
 19 A. Yes, correct.  
 20 Q. So you walked from the counter position for stock  
 21 unit AA to the counter position for stock unit SP1 with  
 22 the physical cash, is that right?  
 23 A. Correct.  
 24 Q. You say then that you noticed immediately at stock  
 25 unit SP1 that the £2,000 had not transferred

14

1 successfully. That's what you say.  
 2 A. Correct.  
 3 Q. I'm going to talk you through that process to see how  
 4 you say you saw immediately that it had not transferred  
 5 successfully, so again I'm going to take it in stages.  
 6 A. Okay.  
 7 Q. First, Mr Latif, you logged into the counter SP1,  
 8 didn't you?  
 9 A. I'm sorry, I didn't quite hear that. Can you repeat the  
 10 question please?  
 11 MR JUSTICE FRASER: Your voice is incredibly low, Mr Draper.  
 12 You will have to speak up.  
 13 MR DRAPER: Forgive me.  
 14 The first step was to log into the counter for stock  
 15 unit SP1?  
 16 A. Correct.  
 17 Q. You then went to the back office screen for that  
 18 terminal and went through the key sequence to view  
 19 transfers in available on that stock unit?  
 20 A. Correct.  
 21 Q. And you say that it is at that point that you realised  
 22 that the £2,000 had disappeared from Horizon; that's  
 23 right, isn't it?  
 24 A. Correct.  
 25 Q. So to check I understand correctly, what you are saying

15

1 is it had disappeared, in the sense that it was not  
 2 available on the screen as a transfer in?  
 3 A. Correct.  
 4 Q. You then say, Mr Latif, that you immediately performed  
 5 a cash declaration on the AA stock unit; is that right,  
 6 that was your next step?  
 7 A. Yes, and also on the SP1 as well.  
 8 Q. Dealing first with the cash declaration on stock  
 9 unit AA, you say you walked back to stock unit AA and  
 10 carried out a cash declaration which involved you  
 11 manually counting the cash, is that right?  
 12 A. Correct.  
 13 Q. And you say that the stock unit balanced. What you mean  
 14 by that I think is that two things were the case and I'm  
 15 going to put each of them to you separately. If we  
 16 assume that before the transfer there was £10,000 cash  
 17 physically in stock unit AA and that the Horizon cash  
 18 figure was 10,000 as well, after the transfer both of  
 19 those were 8,000 -- just hypothetical figures -- is that  
 20 what you say?  
 21 A. Correct.  
 22 Q. And as I understand your evidence what you are saying is  
 23 you knew from that that the transfer out had been  
 24 successful because the physical removal of the cash was  
 25 also reflected in the position on Horizon; Horizon was

16

1 2,000 lower as well, the Horizon figure?  
 2 A. Correct.  
 3 Q. It is right, isn't it, that when you went back to stock  
 4 unit AA you already had, didn't you, the transfer out  
 5 slip?  
 6 A. I did, correct.  
 7 Q. And that showed a transfer out of £2,000?  
 8 A. Yes.  
 9 Q. You could also have simply printed out the transaction  
 10 log from stock unit AA to show the transfer out,  
 11 couldn't you?  
 12 A. Yes you could and we did.  
 13 Q. Sorry, you say that you did?  
 14 A. Yes.  
 15 Q. Is there any reason why you don't mention those steps in  
 16 your witness statement?  
 17 A. I just kept my witness statement as simple and  
 18 straightforward as possible.  
 19 Q. Apart from this cash declaration, you don't mention any  
 20 other steps to identify the transfer out or the  
 21 transfer in, do you?  
 22 A. No, but I can go through those with you. I'm quite  
 23 happy to go through those with you, sir.  
 24 Q. I will come back to those shortly.  
 25 A. I'm experienced -- I have been running a post office for

17

1 17 years, sir. I have also worked for the Post Office  
 2 on training other offices how to run a post office.  
 3 I was also involved in running and introducing the new  
 4 Horizon software changes in 2006 onwards, where I went  
 5 to several offices on behalf of the Post Office to give  
 6 them training. So I'm an experienced, trained  
 7 subpostmaster and I ran my business successfully for  
 8 17 years. So I may have been a bit brief in the  
 9 statement but obviously I can run through those --  
 10 exactly those steps that we would take to make sure that  
 11 there is no operator error on our behalf.  
 12 Q. Maybe we can do it a bit more shortly by my asking you  
 13 this, Mr Latif. You as an experienced subpostmaster  
 14 would know that there were lots of reports you could run  
 15 on Horizon that would show you the transfer out and  
 16 that --  
 17 A. (Inaudible).  
 18 Q. Would show you the transfer in?  
 19 A. Correct.  
 20 Q. And would show you any failure to reconcile the two if  
 21 there was one missing. Do you follow that?  
 22 A. Correct. Correct.  
 23 Q. You also say at paragraph 7 of your witness statement  
 24 {E1/1/2} that you checked the CCTV to see whether you  
 25 had performed the process correctly.

18

1 A. Yes, sir.  
 2 Q. But, Mr Latif, you will have known that, wouldn't you,  
 3 from your transfer out slip, from the cash declaration  
 4 and from all of the other reports that you could run?  
 5 A. Yes, sir, but when we counted the cash £2,000 was  
 6 missing, so that's what alerted us to why we need to  
 7 check the CCTV and make sure (a) that there was no --  
 8 nothing was done incorrectly, make sure all procedures  
 9 were followed and, secondly, make sure there is no theft  
 10 from employees or (inaudible) or something like that  
 11 that happened. So we made sure that the £2,000 that  
 12 disappeared, we made sure that there wasn't anything  
 13 untoward in our -- and we were suspicious of Horizon  
 14 anyhow. Horizon had some glitches in it. I have seen  
 15 it in other branches and I have seen it in my own branch  
 16 as well. So we wanted to make sure that there was no  
 17 other explanation why the £2,000 is gone.  
 18 Q. So you now say, Mr Latif, that you checked the CCTV also  
 19 to make sure that no one had taken £2,000 from the  
 20 branch, is that right?  
 21 A. Correct, correct.  
 22 Q. When would that have happened --  
 23 A. As an experienced subpostmaster -- can I just say as an  
 24 experienced subpostmaster I would make all the checks to  
 25 make sure that nothing untoward happened. In any

19

1 business you would do that; whether it is Post Office,  
 2 whether it is retail, I would make sure that things were  
 3 done properly and nothing untoward had happened.  
 4 Q. The process that you have just described with me,  
 5 Mr Latif, in relation to the transfer involved you  
 6 personally taking every step in that process; that's  
 7 right, isn't it?  
 8 A. Correct.  
 9 Q. You carried out the transfer out on stock unit AA;  
 10 that's right?  
 11 A. Correct.  
 12 Q. You physically moved the cash to stock unit SP1, you  
 13 say?  
 14 A. I did.  
 15 Q. And you tried to process the transfer in on stock  
 16 unit SP1 but you say that failed because there was no  
 17 transfer in to accept. That's what we have just gone  
 18 through.  
 19 A. Correct, correct. At the same time, sir, can I just  
 20 stop you there, I just want to clarify a point that's  
 21 not in my statement which perhaps with hindsight should  
 22 be there. When the transfer was not there in stock  
 23 unit SP1, there's a reverse option on Horizon which you  
 24 can press to bring the cash back. Okay? So you reverse  
 25 the original transaction which says "transfer out".

20

1 It's next to the "transfer out" button, it's a button,  
 2 an icon on Horizon that you press that brings that money  
 3 back to AA.  
 4 Q. Again that's not in your witness statement, Mr Latif,  
 5 but do you now say that that's what you did? You say  
 6 you reversed the transfer out?  
 7 A. Correct, yes.  
 8 Q. Why don't you mention that important detail in your  
 9 witness statement, Mr Latif?  
 10 A. Well, I'm not sure. I mean looking at that carefully,  
 11 that's probably -- maybe perhaps I should have done.  
 12 But can I also say that obviously I had near the time  
 13 when I made the statement lost my father and I was going  
 14 through a period of distress and I lost ... so ...  
 15 Q. I'm sorry to hear that, Mr Latif --  
 16 A. That could be the reason.  
 17 Q. I'm sorry to hear that, Mr Latif, but it is fair to  
 18 point out that you reviewed this statement again this  
 19 month and you made a correction to it, didn't you, in  
 20 relation to the transaction --  
 21 A. Correct.  
 22 Q. You had then every opportunity --  
 23 A. Correct.  
 24 Q. -- to look again at your statement and correct it or add  
 25 any further important detail, didn't you?

21

1 A. Correct, but it is never too late, sir. You have to  
 2 understand we're very busy, running round, so it's  
 3 obviously, you know, an oversight. Yes, perhaps  
 4 I should have put more detail in, but you see I kept my  
 5 statement as simple as possible to keep things simple.  
 6 Q. I will take you back to the CCTV footage that you say  
 7 you looked at and I'm just going to give you the  
 8 context --  
 9 A. Yes.  
 10 Q. -- to my question, so it will be quite a long question,  
 11 if you just wait until I have finished please.  
 12 We have just discussed how every step in the process  
 13 of the transfer out on the stock unit and the physical  
 14 transfer of the cash, and the attempt to transfer in on  
 15 stock unit SP1, were all performed by you personally and  
 16 over a very short period of time; that's right,  
 17 isn't it?  
 18 A. Correct, correct.  
 19 Q. Why then would it help you to look at CCTV footage to  
 20 see whether the £2,000 had somehow been removed from the  
 21 branch?  
 22 A. Well, I wanted to make sure in my mind that everything  
 23 was done properly. I looked at the CCTV as a double  
 24 checkability just to make sure that everything was  
 25 followed correctly.

22

1 Q. But you knew, didn't you, that you hadn't --  
 2 A. That's why ...  
 3 Q. Forgive me. You hadn't taken the £2,000 out of the  
 4 branch, had you?  
 5 A. I want to prove to my colleagues that -- Ms Christine  
 6 Helen Barnett was there, that, you know, the procedure  
 7 was followed and the money was back at AA where it  
 8 should be.  
 9 Q. So you now say you looked at the CCTV because your  
 10 colleagues were concerned that you hadn't done the  
 11 transaction properly?  
 12 MR JUSTICE FRASER: No, that isn't what he said, Mr Draper.  
 13 You can't do that.  
 14 A. No, it was just to double check and make sure -- I'm not  
 15 saying that.  
 16 MR JUSTICE FRASER: Mr Latif, just bear with me just one  
 17 second.  
 18 You can put what you say the answer amounts to back  
 19 to him but you can't say that's what he said if you are  
 20 not putting it back to him in the same terms.  
 21 MR DRAPER: Forgive me, I'll find it as closely as I can  
 22 from the transcript.  
 23 The most important bit of it is inaudible so it is  
 24 hard to see.  
 25 But are you saying that when you looked at the CCTV

23

1 that was because you wanted to show to Mrs Barnett that  
 2 you had done the transaction properly?  
 3 A. Correct.  
 4 Q. So do you no longer say that you were checking the CCTV  
 5 to make sure no one had taken the £2,000 out of the  
 6 branch?  
 7 A. Correct, make sure not anything untoward happened. I'm  
 8 not just saying -- money taken out the branch but money  
 9 could have gone anywhere so I want to make sure the  
 10 money goes back in AA where it should be.  
 11 Q. I'm going to ask just one more question on this. You  
 12 were concerned that you personally might have somehow  
 13 lost the £2,000 during this process, is that what you  
 14 are saying?  
 15 A. No. All I'm saying is I want to make sure that the  
 16 procedure was followed, to make sure that all the --  
 17 Christine and my staff are absolutely confident that the  
 18 correct procedure was followed, the money was in the  
 19 right stock unit (inaudible), but make sure it is  
 20 a software issue not a misplaced cash or cash is lost  
 21 somewhere else. We wanted to make sure that we had done  
 22 everything by the book and make sure that nothing  
 23 untoward had happened.  
 24 Q. Thank you. Forgive me, I'm just going to check the  
 25 transcript a moment because I think some of your answer

24

1 was lost.  
 2 (Pause).  
 3 So there are then two elements, two reasons why you  
 4 say you looked at the CCTV footage: the first was to  
 5 make sure nothing untoward --  
 6 A. Yes, sir.  
 7 Q. The first was to make sure nothing untoward had happened  
 8 and the second was to make sure that you had pressed all  
 9 of the right buttons on the screen, is that right?  
 10 A. Correct.  
 11 Q. So --  
 12 A. Yes, sir.  
 13 Q. Was the CCTV camera focused in on the counter so that  
 14 you could see everything that you had physically done at  
 15 the counter?  
 16 A. Yes, sir. I've got a 16 channel system and there is  
 17 a camera on every counter, which includes SP1, the  
 18 entrance to the main stock unit, stock position, which  
 19 is AA where the main two counters are. There is  
 20 internal and external cameras. So I've got a 16 channel  
 21 camera system that is designed to catch anything that  
 22 moves in the office.  
 23 Q. If what you say about looking at the CCTV footage were  
 24 right, that footage would help confirm at least  
 25 important parts of your evidence, wouldn't it?

1 A. Can you just repeat that question please, sir, my Lord.  
 2 Q. Yes. If what you say is right, the CCTV footage would  
 3 help to confirm important parts of your evidence,  
 4 wouldn't it?  
 5 A. Yes.  
 6 Q. And it might, for example, help you dispute  
 7 responsibility for any shortfall?  
 8 A. Correct.  
 9 Q. And it is right, isn't it, that you haven't provided  
 10 that CCTV footage to Post Office in these proceedings?  
 11 A. That's correct.  
 12 Q. Why not?  
 13 A. Well, that was obviously a long time ago and we were  
 14 convinced that everything was done properly. The CCTV  
 15 was just a backup. I'm still convinced that everything  
 16 was done properly. There is a software glitch that  
 17 stole our money, you know, that disappeared into magic  
 18 air where it is not possible and so I -- we were  
 19 convinced that we were right. So the footage was shown  
 20 to my colleague who is a trusted member of staff and we  
 21 were completely confident that we had done nothing  
 22 wrong. But the problem is with the Post Office, as you  
 23 may or may not be aware, you are always -- we are always  
 24 wrong. So if the money is missing, we have to put it in  
 25 and I just put the money in and said "Okay, you know,

1 I must be wrong" even though we knew everything was done  
 2 perfectly, the CCTV was checked, the process was  
 3 followed properly, we are both experienced personnel and  
 4 Mrs Barnett was with me for over 13 years and, as I say,  
 5 she worked for the police, so we were both trusted  
 6 personnel. However, the way the Post Office view it, if  
 7 you ring the helpline they will say to you "The money is  
 8 missing, you have to put it in" and that's how the  
 9 system -- the procedure works and we're always liable,  
 10 as per my contract with the Post Office, so I had to  
 11 physically put that money in from my own pocket and  
 12 balance the books. As you know, every Wednesday, we  
 13 must balance the books and that's how we were trained to  
 14 procedures within the Post Office.  
 15 So with the money, any monies -- and I mean this is  
 16 just one instance of £2,000 missing. There are several  
 17 other instances where money has disappeared, small  
 18 amounts, and we put it down to the fact that it has got  
 19 to be operator error, you know, that's what we have been  
 20 told by the Post Office, of "Our software is perfect, it  
 21 must be you guys, it must be a training problem, must be  
 22 a staffing problem", or must be somebody making  
 23 a mistake and that's how we reimburse, so we just put  
 24 the money in and carry the money (inaudible)  
 25 Post Office. As we are obviously trained professionals

1 to do so, that's what we did. I mean I'm in a fortunate  
 2 position, I can raise money from the shop, you know, and  
 3 put the money in, but I think others are not in that  
 4 position to do so and that's why I'm kind of  
 5 disappointed with Post Office's behaviour.  
 6 Q. Mr Latif, that's a very long answer and I'm not sure it  
 7 entirely responds to the question I put. I don't accept  
 8 much of what you just said but I'm going to carry on  
 9 with the questions and we can come back to those  
 10 specific points.  
 11 A. As the Post Office I don't expect you to, sir. I'm  
 12 happy for that to be the case.  
 13 Q. The next thing you say in your witness statement is that  
 14 limitations in accessing data and reporting functions  
 15 made it difficult to interrogate the system. Do you  
 16 remember that in your witness statement?  
 17 A. I do, sir.  
 18 Q. That's not consistent, is it, with what you told me  
 19 earlier, which was that you were able to produce lots of  
 20 different reports on Horizon that would show you exactly  
 21 what had happened?  
 22 A. Can I just hold you there for one second.  
 23 My Lord, we can perform stuff at our end, but there  
 24 is a -- Post Office had its own servers and I'm an IT  
 25 guy, you know, I have qualifications in City & Guilds



1 before I came over to the Post Office . So yes, while we  
 2 can make checks at our end at the stock unit level ,  
 3 there are a lot of stuff that happens in the background.  
 4 Obviously you've got your own -- the Post Office has its  
 5 own servers and networks and we can not access those  
 6 server. We just got our user interface at the front end  
 7 and we have a back office where we can do the reports,  
 8 transfers in, transfers out, reports. Yes we can all do  
 9 that. However, there is other stuff that Post Office  
 10 does with our data that we cannot access.  
 11 MR JUSTICE FRASER: Mr Latif, what I'm going to ask you to  
 12 do now is just listen to Mr Draper's questions and try  
 13 and confine your answers just to his questions, if you  
 14 would. Is that clear?  
 15 A. Yes, sir, my Lord, I apologise for that.  
 16 MR JUSTICE FRASER: No, no, that's all right. It sometimes  
 17 happens, but Mr Draper's questions are going to be quite  
 18 tightly focused.  
 19 Over to you, Mr Draper.  
 20 MR DRAPER: Mr Latif, I suggest that's wrong and that  
 21 Horizon provided you with all the information you needed  
 22 on your case. I'm going to take you through that stage  
 23 by stage with short questions and you should be able to  
 24 give short answers. Do you follow?  
 25 A. Okay.

1 Q. Horizon provided you with the information you needed to  
 2 know that the transfer out had succeeded, didn't it?  
 3 A. Yes.  
 4 Q. And you say that you saw immediately on stock unit SP1  
 5 that the transfer in had not succeeded, so Horizon told  
 6 you what you needed to know there as well, didn't it?  
 7 A. Yes.  
 8 Q. And we have already discussed how you could have printed  
 9 off an unreconciled transfer report that would have  
 10 identified any transfer out for which there was not  
 11 a transfer in; that's right, isn't it?  
 12 A. Yes.  
 13 Q. And you could also carry out reports, or checks on all  
 14 of the stock units to see any changes in their Horizon  
 15 cash figures, couldn't you?  
 16 A. Yes.  
 17 Q. You could also physically check the cash in any relevant  
 18 stock unit to see whether it was the same as what the  
 19 Horizon figure showed, couldn't you?  
 20 A. Yes, sir, you can.  
 21 Q. So if your evidence were right that the transfer out  
 22 succeeded but the transfer in failed, Horizon could tell  
 23 you everything you needed to know to confirm that  
 24 position, couldn't it?  
 25 A. I think the issue -- yes, sir, but the issue is what's

1 happened in-between and I can't see what's happened  
 2 in-between, sir. And that's -- I think you're not  
 3 labouring that comment, that you are saying -- you are  
 4 skirting round that, but that's the crux of the issue.  
 5 Q. Do you mean between the time you performed the  
 6 transfer out and you attempted to perform the  
 7 transfer in?  
 8 A. Yes, sir.  
 9 Q. You could also, Mr Latif, during this process have  
 10 phoned the helpline to ask them whether there was any  
 11 report or any function on Horizon that would help you  
 12 investigate what had gone wrong; you could do that as  
 13 well, couldn't you?  
 14 A. You could do, but, as I have said previously, I'm  
 15 a trainer for the Post Office, I train other branches  
 16 how to do their procedures, reconciling accounting,  
 17 balancing, so yes I could do, but you've got two  
 18 experienced people at the counter that have years of  
 19 experience behind them and they knew what they're doing,  
 20 so ...  
 21 Q. So I'm going to try to summarise what you just said and  
 22 tell me if it is not a fair summary.  
 23 A. Okay.  
 24 Q. You are saying that you and your assistants were so  
 25 experienced that you did not need to call the helpline

1 to ask for any help in finding reports or other  
 2 functions?  
 3 A. We did log a complaint to the Post Office, so there will  
 4 be a call log to the Post Office, the log to say the  
 5 money has disappeared, so there will be a call log for  
 6 that, sir.  
 7 Q. That's a separate point. I'm asking why you didn't  
 8 phone the helpline to seek their assistance in  
 9 investigating what had gone wrong and I'm trying to  
 10 summarise your evidence as being that you didn't need to  
 11 because you were so experienced, you knew what to do?  
 12 A. No, we -- first of all, yes, we did ring them, okay?  
 13 I'm not saying we didn't ring them. I'm saying we are  
 14 experienced people, we know what we're doing. We did  
 15 ring them, there will be a call log. Secondly, the  
 16 helpline is not very good either. It is full of  
 17 inexperienced people there in a call centre somewhere  
 18 where we don't know where they are and I have made  
 19 a number of calls to the helpline and the word  
 20 "helpline" is not correct for it, it's not a helpline.  
 21 They go through very basic stuff, okay, and it's not  
 22 very good. That's my personal opinion; nobody else's,  
 23 that's my personal opinion.  
 24 Q. I'm going to take you to a couple of examples then of  
 25 the helpline assisting you and your staff, Mr Latif.

1 Can we call up the call log please at {F/1829.1}. If  
 2 the operator could move down to row 49 please. Do you  
 3 see in column D, Mr Latif, that this is a telephone call  
 4 from your branch in November 2014?  
 5 A. You said column D?  
 6 Q. Yes, that's right. Just looking for the date there.  
 7 Row 49.  
 8 A. Yes.  
 9 Q. Then if the operator could please move the screen  
 10 sideways so that we can see column M please. That is  
 11 a description of the call from your branch and I will  
 12 read it out:  
 13 "Is there a report they can do to check what has  
 14 been transferred through units."  
 15 Do you see that?  
 16 A. Yes.  
 17 Q. And if the operator can move us along to column U  
 18 please. This, Mr Latif, is the answer that was given on  
 19 that call and you see it says:  
 20 "Yes tran log using mode for transfers."  
 21 Do you see that?  
 22 A. Yes, sir.  
 23 Q. So what this shows, I suggest, is that in November 2014  
 24 one of your assistants phoned the helpline to ask how to  
 25 identify transfers between stock units and was told,

33

1 correctly, that they could identify them from the  
 2 transaction log; that's right, isn't it?  
 3 A. Yes, sir.  
 4 Q. If we could go now down to row 70 please and across to  
 5 the left please as well so we can see column A and so  
 6 on. You see this is another call at row 70 from your  
 7 branch, Mr Latif, and the date for this one in column D  
 8 is 20 January 2015. Do you see that?  
 9 A. Yes, sir.  
 10 Q. And if we go to column M please we see again the  
 11 question -- and I suggest there is obviously a missing  
 12 word in it, tell me if you disagree, but it should read:  
 13 "Can [we] print off report that will show transfers  
 14 between stock units."  
 15 Do you see that?  
 16 A. Yes, sir.  
 17 Q. And going to column U again please, this is the advice  
 18 given:  
 19 "Advised how to do so - TL mode - transfers -  
 20 print."  
 21 I suggest that "TL mode" is "transaction log",  
 22 do you agree?  
 23 A. Yes, sir.  
 24 Q. So this is the second occasion on which you or a member  
 25 of your staff had been told how to show transfers on

34

1 reports you could print in the branch; that's right,  
 2 isn't it?  
 3 A. Yes, sir, but can I just make a point here, if I may,  
 4 my Lord?  
 5 MR JUSTICE FRASER: Yes, go on.  
 6 A. The branch is open from 6 o'clock in the morning to  
 7 9 pm, seven days a week, so at times I may not be there,  
 8 or Christine Barnett may not be there, or Muhammad may  
 9 not be there, so if the operator is not sure they will  
 10 ring up the helpline to get the help that they need,  
 11 okay? So the fact that there are calls does not really  
 12 specifically -- you know, I'm not surprised because  
 13 I can't be there from 6 o'clock in the morning until  
 14 9 o'clock seven days a week, sir.  
 15 MR DRAPER: Mr Latif, on the basis of what you say happened,  
 16 the failed transfer between stock units, the truth is  
 17 there were no limitations on the information that  
 18 Horizon could provide to you to help you investigate it;  
 19 that's the position, isn't it?  
 20 A. At the front end, yes, but we don't know what happens at  
 21 the back end and we don't have access to that, sir, and  
 22 that's my point, my Lord.  
 23 MR DRAPER: Maybe, my Lord, one question before a short  
 24 break for the transcribers?  
 25 MR JUSTICE FRASER: How long are you going to be, because it

35

1 might be we can put the break a little later, but don't  
 2 feel hurried. If you think you still have --  
 3 MR DRAPER: Quite a while, sir.  
 4 MR JUSTICE FRASER: All right.  
 5 MR DRAPER: What report or information do you say Horizon  
 6 did not provide you that would have helped you  
 7 understand what had happened with the transfer out and  
 8 the transfer in?  
 9 A. It's the stuff in-between the transfer in from one place  
 10 to the other place. It obviously goes through the  
 11 Post Office servers and we don't have access to that --  
 12 at the front end at the office, we don't have access to  
 13 that. All we have is the front end system and that's  
 14 it. Obviously I'm convinced that something has gone  
 15 wrong in-between the (inaudible) process, there is  
 16 a glitch and we cannot -- I'm not in a position to find  
 17 out what has happened.  
 18 MR DRAPER: That's probably a convenient moment, my Lord.  
 19 MR JUSTICE FRASER: You want to stop now?  
 20 MR DRAPER: For the break and come back.  
 21 MR JUSTICE FRASER: Mr Latif, we are having these  
 22 proceedings transcribed which means every hour/hour and  
 23 20 minutes we have to have a break for the person who is  
 24 doing the typing, so we're going to have one of those  
 25 breaks now. They are usually between 5 and ten minutes.

36

1 This one is actually going to be eight minutes long. So  
 2 you get a break for eight minutes. Can I just ask you  
 3 two things please: one is please don't touch any of the  
 4 equipment because I've got previous experience of links  
 5 dropping over breaks.  
 6 A. Yes, sir.  
 7 MR JUSTICE FRASER: And the second one is because you are in  
 8 the middle of your cross-examination, during that break  
 9 please don't talk to anyone about the case. Is that  
 10 understood?  
 11 A. Yes, sir.  
 12 MR JUSTICE FRASER: Thank you very much. We will have an  
 13 eight minute break and come back at quarter to.  
 14 A. Thank you.  
 15 (11.37 am)  
 16 (Short Break)  
 17 (11.45 am)  
 18 MR DRAPER: Mr Latif, just before the break you said that  
 19 you had carried out a reversal to reverse the  
 20 transfer out on stock unit AA, is that right?  
 21 A. Correct, sir.  
 22 Q. That's a reversal that you say you personally carried  
 23 out?  
 24 A. Yes, sir.  
 25 Q. Using your user ID that you told me earlier was ALA001?

1 A. Correct.  
 2 Q. Can you explain then why Post Office's transaction  
 3 records show no reversal carried out by you  
 4 in July 2015?  
 5 A. I don't know what records Post Office holds, sir.  
 6 I cannot really accept (inaudible) holding.  
 7 Q. We will come back to the transaction data shortly, but  
 8 I just want to make clear that we suggest now there was  
 9 no transfer out reversal carried out by you  
 10 in July 2015. Would you like to comment on that?  
 11 A. So where has the money gone?  
 12 Q. That's a different point, Mr Latif. I'm suggesting you  
 13 did not carry out a reversal of a transfer out for  
 14 £2,000 in July 2015. Can you comment on that suggestion  
 15 please?  
 16 A. Well, if that was the case, or that's what you're  
 17 suggesting, then the money should be in somewhere  
 18 (inaudible). It's not there either. I'm saying to you,  
 19 sir, that there is a glitch with the software and,  
 20 you know, who knows what happens behind the software.  
 21 I cannot read -- I cannot see into it. I'm just telling  
 22 you what I know, sir.  
 23 Q. Sorry, Mr Latif, just to clarify something on the  
 24 transcript, you said "If that were right then the money  
 25 would be somewhere in ..." then the next word was

1 inaudible. What was the word you said there?  
 2 A. Well, the money will be somewhere in the office, either  
 3 whether it is SP1 or AA. If you are saying that  
 4 I didn't do a transfer in -- back into AA then the money  
 5 would be in SP1 and the money was not in SP1. So the  
 6 money has disappeared. Where has it gone?  
 7 Q. Those are different points, Mr Latif. You are talking  
 8 about the physical cash at this point. Where the  
 9 physical cash goes has got nothing to do with Horizon,  
 10 the physical cash goes where you physically put it;  
 11 that's right, isn't it?  
 12 A. But -- that's right.  
 13 Q. And you say you physically put the cash back in stock  
 14 unit AA.  
 15 A. Correct.  
 16 Q. So stock unit AA would then show a surplus, wouldn't it,  
 17 unless you carried out a reversal of the transfer out?  
 18 A. Correct.  
 19 Q. Earlier on when we were talking about the helpline,  
 20 Mr Latif, you said that you did call the helpline and  
 21 you made some remarks about not finding the helpline  
 22 very useful. I don't need to hear that again, I just  
 23 wanted to ask you a short question about that. When do  
 24 you say you called the helpline about this alleged  
 25 failed transfer?

1 A. I cannot be completely sure when that was, sir, if I'm  
 2 honest.  
 3 Q. Well, was it when the failure happened?  
 4 A. I believe it was July.  
 5 Q. If I show you the call log for the relevant period and  
 6 it shows that there are no calls from you or your  
 7 assistants in relation to a failed transfer, would you  
 8 accept that you are mistaken?  
 9 A. Well, sometimes we also ring the area sales manager, so  
 10 I may have rang him, so it doesn't necessarily mean that  
 11 there were no logs of the call.  
 12 Q. Which do you say you phoned, the area sales manager or  
 13 the helpline?  
 14 A. I believe it was the helpline, but it's a long time ago.  
 15 Q. If we could call up the call log please, which is at  
 16 {F/1829.1}. If the operator could please take us to row  
 17 89. Do you see, Mr Latif, row 89 and looking over to  
 18 column D, that gives a date of 29 June 2015 which is the  
 19 first entry on this log for June? I'm just confirming  
 20 that you see it, Mr Latif?  
 21 A. Yes, I can.  
 22 Q. And if the operator could take us down please to row 97,  
 23 and looking again in column D, that's a call on  
 24 11 August 2015 and is the last call shown in August. So  
 25 if we look between those two rows, Mr Latif, that will

1 be the calls logged from between June and August 2015.  
 2 Do you follow?  
 3 A. Yes.  
 4 Q. Please can the operator take us to column M and looking  
 5 then, Mr Latif, in column M at row 89 we see from  
 6 column L that this is a call from Chris and the call  
 7 says:  
 8 "[Lots] of customers are coming in saying the  
 9 website shows the branch has accepting [ukba] aie."  
 10 That looks to be a call about the website; that's  
 11 right, isn't it?  
 12 A. Yes.  
 13 Q. And looking down these rows, row 90 at column M, that's  
 14 a call about a passport, do you see that?  
 15 A. Yes.  
 16 Q. Row 91, again a call from Chris is about travel  
 17 insurance, do you see that?  
 18 A. Yes, yes.  
 19 Q. Row 92 is about ordering euros?  
 20 A. Yes.  
 21 Q. Row 93 is about an error with transaction  
 22 acknowledgements, do you see that?  
 23 A. Yes.  
 24 Q. Row 94 is about euros again.  
 25 A. Yes.

1 Q. Row 95 is a miskey error, do you see that?  
 2 A. Can you repeat that please, sir.  
 3 Q. Row 95 is -- forgive me, it's what I would call a miskey  
 4 error. One of the assistants has pressed the wrong  
 5 buttons on Horizon and so has entered the wrong amount  
 6 for a rem out.  
 7 A. Okay, so are you saying the helpline makes a mistake?  
 8 Q. I'm saying that someone in your branch, you or one of  
 9 your assistants, appears from this call log to have made  
 10 a mistake in performing a rem out; specifically rather  
 11 than remming it out for £118.74, it was remmed out for  
 12 £11.74. Do you see that?  
 13 A. Yes, yes.  
 14 Q. That's a fairly easy mistake to make, isn't it,  
 15 Mr Latif, in your experience?  
 16 A. Well, everyone is human, sir, so yes, people do make  
 17 mistakes.  
 18 Q. And mistakes like that sometimes happened in your  
 19 branch, didn't they?  
 20 A. Sir, I would inform you that mistakes happen everywhere.  
 21 But they are easily rectifiable and can be resolved in  
 22 most cases.  
 23 Q. Tell me how they are resolved, those kind of mistakes,  
 24 Mr Latif?  
 25 A. Well, the steps you can take to resolve matters -- in

1 this case someone remmed the wrong amount out, so you  
 2 can rem the extra amount out, so there's various things  
 3 you can do to rem the correct -- make the correct  
 4 decision. When money goes remmed out it is checked the  
 5 other side and if it is wrong, they come back and tell  
 6 you it's wrong. So there are steps in place to make  
 7 sure that things are done properly. So yes, mistakes do  
 8 happen, but they are easily rectified.  
 9 Q. And those mistakes are usually rectified by your  
 10 informing Post Office and Post Office helping you by  
 11 issuing a transaction correction, for example?  
 12 A. Not always, sir. That's not my experience with them.  
 13 Sometimes they do, sometimes they don't. It all depends  
 14 on what operator you get on what day and that's my  
 15 personal experience and that's the experience and the  
 16 mood I have in the office, that it's hit and miss. It  
 17 depends on which operator you get, how well they are  
 18 trained, it is whether the response you get back is good  
 19 or not so good.  
 20 Q. It also depends, doesn't it, Mr Latif, on how clearly  
 21 you identify the problem? You would accept that,  
 22 wouldn't you?  
 23 A. Yes, indeed. In terms of if they are remote they can't  
 24 see what we've got in front of ourselves. You know,  
 25 their knowledge can sometimes be very basic. Sometimes

1 very good -- sometimes very good, sir, I accept that.  
 2 But sometimes it's not.  
 3 Q. Moving on, Mr Latif, along this spreadsheet that we have  
 4 been looking at, we were looking down the rows. Row 96,  
 5 the one below the miskey concerns a car registration  
 6 document. Do you see that one?  
 7 A. Yes, sir.  
 8 Q. Row 97 relates to travel insurance?  
 9 A. Yes.  
 10 Q. So those are all the call logs for June to August 2015  
 11 and they don't show the call that you say you made. How  
 12 do you explain that?  
 13 A. I'm not sure. Sometimes we ring up and they don't know  
 14 that we made the call. We've had in the past when we  
 15 rang up, we say we spoke to somebody and they haven't  
 16 logged the call properly. Mistakes do happen, sir.  
 17 Q. On the basis of these records, Mr Latif, Post Office  
 18 will contend that there was no call that you made of  
 19 that kind, but I think I have your answer to that.  
 20 Now, moving on --  
 21 MR JUSTICE FRASER: Just before you move on, Mr Draper. Is  
 22 this in chronological order, this call log?  
 23 MR DRAPER: My Lord, it is largely in chronological order.  
 24 MR JUSTICE FRASER: Because I'm looking at it on my private  
 25 screen and I thought it would be and it doesn't appear

1 to be.  
 2 MR DRAPER: It is within sections but I think, if I'm right,  
 3 towards the top --  
 4 MR JUSTICE FRASER: Well, row 2, for example, has June 2016  
 5 and then later on it goes to 2014 and then back to 2015,  
 6 so is there any pattern to it?  
 7 MR DRAPER: I can't give you a detailed answer as to why,  
 8 my Lord --  
 9 MR JUSTICE FRASER: All right, let's not worry about it at  
 10 the moment, I just thought I would ask.  
 11 MR DRAPER: The point for present purposes is there are on  
 12 this call log no other calls between June and August.  
 13 MR JUSTICE FRASER: I understand that's the point that you  
 14 are putting to the witness and it's not necessary to  
 15 pursue it now, but, for example, row 2 is a June 2016  
 16 entry.  
 17 MR DRAPER: Yes.  
 18 MR JUSTICE FRASER: But we can deal with that separately.  
 19 You continue with Mr Latif.  
 20 MR DRAPER: Thank you.  
 21 Mr Latif, in your witness statement you say there  
 22 was a shortfall in the branch account for £2,000 that  
 23 you attribute to the failed transfer that you describe,  
 24 is that right?  
 25 A. Yes, sir.

1 Q. The first point on that, Mr Latif, is Post Office's  
 2 records from the data it has about your branch show no  
 3 shortfall of that amount between June and August 2015.  
 4 Would you like to comment on that?  
 5 A. Well, we would have put the money in, sir, so by the  
 6 following Wednesday, reconciliation, the money has to be  
 7 put in otherwise we cannot rollover with a shortfall,  
 8 it's not possible.  
 9 Q. But it's right, isn't it, that before rolling over you  
 10 would carry out balance snapshots, variance checks,  
 11 other kinds of reports that would identify  
 12 a discrepancy, wouldn't they, if there were one?  
 13 A. We would do that if there was discrepancy, sir, anyhow.  
 14 As soon as we find a discrepancy we print the balance  
 15 snapshot, transaction logs, so we would do that by  
 16 definition, we would do that by default. That's how we  
 17 were trained to do so.  
 18 Q. And those steps that I have described, variance checks,  
 19 balance snapshots, trial balances, all of those things  
 20 that you do would come up with a discrepancy on the  
 21 screen, wouldn't they? That's how you would identify  
 22 it?  
 23 A. Yes.  
 24 Q. The transaction and event data for June to August 2015  
 25 shows no such reports that disclosed a discrepancy of

1 £2,000. Would you like to comment on that?  
 2 A. I don't know how the Post Office's system works  
 3 internally. I know the user side of it, but I don't  
 4 know how the inside works. So I don't know what's going  
 5 on.  
 6 Q. Coming back then to the shortfall that you allege, when  
 7 do you say you became aware of the shortfall?  
 8 A. Immediately after the transfer did not go through we did  
 9 a cash calculation to make sure, that's when (inaudible)  
 10 £2,000 missing.  
 11 Q. A cash declaration on which stock unit, Mr Latif?  
 12 A. SP1 balanced but AA did not.  
 13 Q. If you go back to your witness statement, Mr Latif, at  
 14 {E1/1/2}, at paragraph 7 you describe having done a cash  
 15 declaration on stock unit AA to confirm that the £2,000  
 16 had been transferred out; that's right, isn't it?  
 17 A. Yes, that's correct.  
 18 Q. You then say that after the transfer in failed you took  
 19 the £2,000 physical cash back to stock unit AA and put  
 20 it into the cash drawer?  
 21 A. Yes.  
 22 Q. That's what you say.  
 23 A. Yes.  
 24 Q. And this isn't in your witness statement, Mr Latif, but  
 25 you now say that you performed another cash declaration

1 on stock unit AA and that this second one showed  
 2 a shortfall?  
 3 A. Well, once the transfer did not happen to SP1, we became  
 4 suspicious that something has gone wrong. So we would  
 5 will do another cash declaration. Balance snapshot was  
 6 printed, a transfer log was done, transaction log was  
 7 done, so a number of checks were made to make sure  
 8 what's happened to the money (inaudible).  
 9 Q. Was this cash declaration before or after you say you  
 10 reversed out the transfer out?  
 11 A. One was done before and then the other was done after  
 12 the transfer in and then we did another one just to make  
 13 sure that we hadn't counted the money wrong or  
 14 double-checked every single thing in the office to make  
 15 sure that everything was as it is.  
 16 Q. Mr Latif, why do you give no evidence in your witness  
 17 statement about this process of finding and failing to  
 18 understand a £2,000 shortfall in stock unit AA?  
 19 A. When you say "evidence" what are you referring to, sir?  
 20 Q. Your witness statement, Mr Latif.  
 21 (Pause).  
 22 A. Can you repeat that question?  
 23 Q. Why do you not in your witness statement say anything  
 24 about this detailed process that you have now explained  
 25 of finding a shortfall on stock unit AA and

1 investigating it?  
 2 A. Well, I'm an experienced subpostmaster and to me the  
 3 steps that we do are basic logic steps, but obviously to  
 4 other people it may not come across -- I now realise  
 5 that that's not how it comes across to other people that  
 6 have no experience within the Post Office, so perhaps in  
 7 hindsight I could have been a bit more clearer, but the  
 8 fact remains the money disappeared and there's  
 9 nothing -- you know, I'm confident -- I'm extremely  
 10 confident that it is the software that's caused the  
 11 problem.  
 12 Q. Let me ask you a question about the use of the word  
 13 "disappeared" there, Mr Latif. In your witness  
 14 statement you say that the transfer in disappeared. We  
 15 discussed that earlier, do you recall, that when you  
 16 went to stock unit SP1 --  
 17 A. Yes.  
 18 Q. -- the £2,000 transfer in was missing? Do you recall  
 19 that?  
 20 A. Yes.  
 21 Q. You don't say --  
 22 A. Yes, it disappeared.  
 23 Q. You don't say anywhere in your witness statement that  
 24 the £2,000 physical cash also somehow disappeared, but  
 25 that seems to be what you are now saying, is that right?

49

1 A. Well, the system gave a shortfall of £2,000 and that's  
 2 been my statement all the way through, sir, so I don't  
 3 know what you're trying to confuse me, but there's  
 4 a shortfall of £2,000 in stock unit AA and there should  
 5 not be a stock shortfall. The money is physically  
 6 there.  
 7 Q. If I have confused you, I'm sorry --  
 8 A. It was a counting error, sir.  
 9 Q. If I have confused you I apologise. I will take it  
 10 slowly.  
 11 MR JUSTICE FRASER: I think, Mr Draper, the starting point  
 12 is paragraph 8, isn't it, and what he means by his last  
 13 sentence.  
 14 MR DRAPER: Yes, that's right.  
 15 MR JUSTICE FRASER: Which is probably worth exploring just  
 16 so you can be clear what his evidence is about.  
 17 MR DRAPER: Yes.  
 18 I think it is right, Mr Latif, that you are now  
 19 explaining that you say that immediately after the  
 20 failed transfer that you describe there was a £2,000  
 21 shortfall in stock unit AA. That's what you say?  
 22 A. Yes, sir, correct.  
 23 Q. And you say that shortfall was after you had reversed  
 24 the transfer out, is that right?  
 25 A. Correct, correct.

50

1 Q. And after you had put the £2,000 back in stock unit AA?  
 2 A. Correct.  
 3 Q. So on your account the physical cash in stock unit AA  
 4 would be the same after all of these processes as it was  
 5 before, you had taken it out and put it back; that's  
 6 right, isn't it?  
 7 A. Correct.  
 8 Q. And you say there was nonetheless a shortfall in that  
 9 stock unit?  
 10 A. Yes, the cash declaration showed a shortfall of £2,000.  
 11 Q. Logically that must mean that the Horizon cash figure  
 12 had gone up £2,000 over the same period of time?  
 13 A. It should have balanced out, it should have been nil, it  
 14 should have been no discrepancy. So it looks like the  
 15 software for some reason is -- done something twice. It  
 16 has done something it's not supposed to do. There's  
 17 a glitch somewhere, sir.  
 18 Q. Mr Latif, on your account the only thing that can have  
 19 caused the shortfall that you're describing is the  
 20 Horizon derived cash figure for stock unit AA somehow  
 21 having increased; that's right, isn't it?  
 22 A. Correct, it's a software accounting issue, sir. That's  
 23 my statement.  
 24 Q. That also isn't described anywhere in your witness  
 25 statement, that you identified some problem with the --

51

1 A. Well, we cannot look -- I mean I do not have access to  
 2 the Post Office's internal software so I can only assume  
 3 the money is missing. It has disappeared into the  
 4 Post-Office's system. That's all I can say.  
 5 Q. Mr Latif, that's not right. Let me take it slowly with  
 6 you, Mr Latif.  
 7 If your account were right, the problem would be  
 8 that the Horizon cash figure in stock unit AA had  
 9 somehow gone up by 2,000 when it shouldn't have done so.  
 10 That's right, isn't it?  
 11 A. The money is there but the system doesn't resolve.  
 12 Something has gone wrong with the transfer, sir.  
 13 Q. Can you just answer the question. Am I right that the  
 14 derived Horizon cash figure would have had to go up by  
 15 £2,000 for there to be a £2,000 shortfall given that the  
 16 physical cash, on your case, was the same?  
 17 A. The Horizon derived figure and the physical figure  
 18 should have matched, but they did not, sir, and the  
 19 shortfall -- what I'm saying is there is a loss of  
 20 £2,000. So that does not make sense.  
 21 Q. If that were right, Mr Latif --  
 22 A. It shouldn't have happened.  
 23 Q. Mr Latif, it would have been very easy for you to have  
 24 shown that, wouldn't it, and to have described it in  
 25 your witness statement? What you would have said was:

52

1 before these processes the Horizon derived cash figure  
 2 for stock unit AA was X thousand and after all of these  
 3 processes the Horizon derived cash figure was X minus  
 4 2,000 and there was no reason for that. Do you follow?  
 5 A. That is what happened, that's what I'm trying to say.  
 6 Q. I think you said earlier, before the break, that you had  
 7 had to put £2,000 into the branch, is that right?  
 8 A. Correct, sir.  
 9 Q. When do you say you did that?  
 10 A. I would have done it on the Wednesday (inaudible), sir.  
 11 Q. Do you say you did that without disputing this  
 12 shortfall, Mr Latif?  
 13 A. We are liable. The Post Office's contract clearly says  
 14 that we are liable for any shortfalls.  
 15 Q. Is your understanding that you are liable for  
 16 a shortfall even if it is a computer glitch, is that  
 17 what you are saying?  
 18 A. Yes, sir, we're liable.  
 19 Q. Mr Latif, you will appreciate we don't accept that there  
 20 was any such shortfall, or that you paid it in, but can  
 21 you comment on this suggestion. If you genuinely  
 22 believed that the derived cash figure on stock unit AA  
 23 had been increased by a glitch and that therefore you  
 24 were in no way responsible for any of this, what do you  
 25 say to the suggestion that it's very surprising that you

1 wouldn't raise that with Post Office and complain about  
 2 it?  
 3 A. Well, I have complained to the area manager, sir, so  
 4 I don't know your saying I haven't complained. I have  
 5 complained to the area manager, Mr Navjot Jando,  
 6 a number of times, so I don't know why you're saying  
 7 I haven't complained about it or raised it.  
 8 Q. So do you now say you disputed a £2,000 shortfall  
 9 in July 2015 by contacting your area manager and  
 10 complaining that there was a glitch; is that what you  
 11 are now saying?  
 12 A. Well, yes, we would have obviously raised questions, but  
 13 there is a glitch or something and we don't know what's  
 14 happened. This is just one instance, sir, but there are  
 15 a number of other instances which I haven't given in my  
 16 statement. It happens all the time and generally we  
 17 think it's the operator that's causing the problem and  
 18 that's what the Post Office keep telling us, it's  
 19 operator error, not necessarily it's a software error,  
 20 and this is clearly a software error, sir. And also,  
 21 can I just say, when I have been training other offices  
 22 they have been telling me a similar story, sir.  
 23 MR JUSTICE FRASER: Mr Latif, just hold on a second, please.  
 24 You gave the name of your area manager and the  
 25 transcript didn't pick it up. Can you just tell me what

1 they were called please.  
 2 A. Sorry?  
 3 MR JUSTICE FRASER: The name of your area manager.  
 4 A. Mr N-A-V-J-O-T, J-A-N-D-O.  
 5 MR JUSTICE FRASER: Thank you very much.  
 6 A. Correct, sir.  
 7 MR JUSTICE FRASER: Now, all of the rest of your answer has  
 8 gone onto the transcript so you can take that that's in  
 9 the record. Can you now just concentrate on Mr Draper's  
 10 specific questions please.  
 11 Mr Draper.  
 12 MR DRAPER: Yes.  
 13 A. Yes, sir.  
 14 Q. Just to confirm your previous answer, you said that you  
 15 would have complained, or words to that effect, about  
 16 the glitch. Do you say that you in fact did phone your  
 17 area manager and tell him that you had suffered a £2,000  
 18 loss as a result of a glitch as you have just described?  
 19 A. Yes, sir.  
 20 Q. Why is none of that recorded in your witness statement?  
 21 A. I didn't think it was relevant. I talk to the area  
 22 manager about a lot of things, so, you know ...  
 23 Q. Do you accept that you did not, however, phone the  
 24 helpline to say that you had suffered a £2,000 loss as  
 25 a result of a glitch?

1 A. There would have been definitely a call to the helpline.  
 2 I'm not sure why it is not showing up there, but it  
 3 should have been logged all through helpline as well.  
 4 As you can see, we quite regularly make calls to the  
 5 helpline.  
 6 Q. I'm going to now take you quickly, I hope, through  
 7 Post Office's case. Can I ask you to turn to  
 8 Ms van den Bogerd's witness statement which is at  
 9 {E2/5/23} and paragraphs 90 to 91 of that statement.  
 10 Can you read please those two paragraphs just in your  
 11 head, no need to read it out loud please.  
 12 (Pause).  
 13 A. Okay.  
 14 Q. Ms van den Bogerd has taken the three months around the  
 15 date that you identify. So you say "in around July";  
 16 Post Office has looked at June, July and August. She  
 17 has taken the transaction and event data for your branch  
 18 and based on her review of that data she says there were  
 19 no transfers out of £2,000 in June and in July  
 20 and August there were transfers of £2,000 but for every  
 21 transfer out there was a corresponding transfer in.  
 22 That's Ms van den Bogerd's evidence. Do you accept that  
 23 that's what the transaction data shows?  
 24 MR JUSTICE FRASER: Well, first you need to ask him if he  
 25 has seen the transaction --

1 A. But that does not mean they were done properly though,  
 2 does it?  
 3 MR JUSTICE FRASER: Mr Draper, first you have to ask him if  
 4 he has seen the transaction data.  
 5 MR DRAPER: Have you, Mr Latif, had an opportunity to see  
 6 any of the transaction data?  
 7 A. Sorry, can you repeat the question please.  
 8 Q. Have you looked at any of the transaction data to which  
 9 Ms van den Bogerd refers?  
 10 A. You mean this document in front of me now?  
 11 Q. No, forgive me. This is her witness statement. She  
 12 says here what the data shows. But Post Office has also  
 13 provided to your solicitors the underlying transaction  
 14 data documents that she has looked at. Have you seen  
 15 those Excel spreadsheets?  
 16 A. I haven't seen the spreadsheet but I did have a call  
 17 with my solicitors a few weeks ago.  
 18 Q. We don't need to know about that, Mr Latif. But you  
 19 haven't seen the spreadsheet is the key point there,  
 20 that's right?  
 21 A. No, no.  
 22 Q. Okay.  
 23 A. I have been out of the country since 19 February as  
 24 well, sir, so ... I think these transfers are coming in  
 25 a little bit late and I have poor internet access where

1 I am, I'm in the mountains in Kashmir and there is the  
 2 small matter of tensions between India and Pakistan  
 3 going on as well, so I have very limited access to the  
 4 outside world apart from -- predominantly voice calls .  
 5 Q. Mr Latif, since when is that that you have been in  
 6 Kashmir?  
 7 A. I arrived on 19 February, sir .  
 8 Q. I'm going to show you the underlying transaction data  
 9 for June 2015, Mr Latif, and the suggestion I'm going to  
 10 make is that shows no transfers of £2,000 within your  
 11 branch. If you are confident that this problem occurred  
 12 in July, there's no need to look at June. Would you  
 13 like to look at June?  
 14 A. Why not?  
 15 Q. I'm sorry, Mr Latif, I missed that. What did you say?  
 16 A. I said why not -- while we are here, why not?  
 17 Q. If the operator could call up please {F/1353.1}.  
 18 Mr Latif, I should explain, this is not a document of  
 19 a type you will have seen. It's not a report printed  
 20 out in your branch. It's an Excel spreadsheet showing  
 21 data from Post Office. Do you understand?  
 22 A. Okay, I do.  
 23 Q. This is the full transaction data and we won't scroll  
 24 down but it is an extremely long document so what  
 25 I propose to show you is a filtered version that only

1 shows transfers out and transfers in, okay?  
 2 A. Okay.  
 3 Q. If the operator could please call up that version. This  
 4 spreadsheet has now been filtered using codes that the  
 5 claimants are aware of that enable the spreadsheet to  
 6 show only transfers out and transfers in .  
 7 MR JUSTICE FRASER: Is this an agreed document then this  
 8 one?  
 9 MR DRAPER: No, this was produced shortly before the  
 10 cross-examination rather than doing it manually. It  
 11 takes a couple of minutes.  
 12 MR JUSTICE FRASER: All right, continue. We will need to  
 13 address this at the end I think.  
 14 MR DRAPER: Mr Latif, now that this has been filtered , if  
 15 you scan your eye down column L there are no transfers  
 16 shown for £2,000 on this spreadsheet.  
 17 (Pause).  
 18 MR JUSTICE FRASER: I'm not really sure where this is going  
 19 to get us, Mr Draper, to be honest. It's a bit much to  
 20 ask a witness to look at a document that has about --  
 21 how many is it, entries?  
 22 MR DRAPER: You won't be able to tell by counting, I don't  
 23 think.  
 24 MR JUSTICE FRASER: Quite, that's rather my point. But if  
 25 your case is there are no entries on there for £2,000

1 in June, just put that point to the witness and he might  
 2 either agree or disagree.  
 3 MR DRAPER: Sure.  
 4 Mr Latif, Post Office says there are no entries here  
 5 for a transfer of £2,000 in June. Do you accept that?  
 6 A. I can understand what you're saying, but I'm confident  
 7 there's a glitch in the software, so it's possible it's  
 8 missing.  
 9 MR JUSTICE FRASER: Maybe a different way, a quicker way of  
 10 getting to the same point, or a broadly quicker  
 11 way: Mr Latif, on this document for June it shows  
 12 various transfers for different amounts.  
 13 A. Yes.  
 14 MR JUSTICE FRASER: Can you remember roughly how often you  
 15 would have to fill up or replenish the combi-counter  
 16 cash till with money from stock unit AA?  
 17 A. Quite regularly, sir .  
 18 MR JUSTICE FRASER: I beg your pardon?  
 19 A. Quite regularly, sir .  
 20 MR JUSTICE FRASER: Quite regularly.  
 21 A. At least every other day.  
 22 MR JUSTICE FRASER: All right. Back to you, Mr Draper.  
 23 MR DRAPER: The next point, Mr Latif, that Ms van den Bogerd  
 24 makes is that she has checked the transaction data  
 25 for July 2015 and there were two transfers of £2,000



1 between stock unit AA and stock unit SP1, but both of  
 2 those were successful.  
 3 A. How do you determine successful, sir?  
 4 Q. Maybe I can show you the spreadsheet. It is at  
 5 {F/1365.1}. This again is the raw data but if the  
 6 operator can filter it to just show transfers out and  
 7 transfers in. Mr Latif, can you see that? The first  
 8 transfer out Post Office says is at row 18352. Do you  
 9 see that? Maybe if the operator could highlight the  
 10 four entries starting at 18351 and going down to 18359.  
 11 What Post Office says this data shows, Mr Latif, is  
 12 a successful transfer of £2,000 from stock unit AA to  
 13 stock unit SP1 and Post Office says that transfer out  
 14 was performed by Christine Barnett. You see her  
 15 user ID. And the transfer in was performed by  
 16 Christine Fensome, we see her user ID. Do you see that,  
 17 Mr Latif?  
 18 A. Yes, sir.  
 19 Q. The next transfer --  
 20 MR JUSTICE FRASER: Hold on, before you -- are you moving  
 21 off this page?  
 22 MR DRAPER: To lower down on the page.  
 23 MR JUSTICE FRASER: But on these four can you just identify  
 24 for the transcript, because I think it will be useful,  
 25 what line shows what happening at what time, out of or

1 into of what unit? Because they are grouped together in  
 2 a way which seems to me to be a bit confusing.  
 3 MR DRAPER: Yes. Post Office contends that the transfer out  
 4 is shown at row 18352 as being performed by  
 5 Christine Barnett out of stock unit AA, the time is  
 6 given.  
 7 MR JUSTICE FRASER: Can you tell me what it is please.  
 8 MR DRAPER: 13.52.22. And that is for £2,000.  
 9 MR JUSTICE FRASER: And the date?  
 10 MR DRAPER: 21/07/2015.  
 11 Then the transfer in is at row 18359. It is  
 12 performed by Christine Fensome. It is on stock  
 13 unit SP1, it has the same date, 21 July 2015, it is  
 14 timed at 13.55.01 and it is also for £2,000.  
 15 MR JUSTICE FRASER: And that's into SP1?  
 16 MR DRAPER: It is.  
 17 MR JUSTICE FRASER: And then the other one?  
 18 MR DRAPER: The next transfer starts at row 25988.  
 19 MR JUSTICE FRASER: No, no, sorry, there are four together  
 20 there, aren't there?  
 21 MR DRAPER: There are four entries. This is probably  
 22 a point I should explain to Mr Latif.  
 23 MR JUSTICE FRASER: Just deal with this first and give me  
 24 the entries and then deal with it --  
 25 MR DRAPER: Yes. My Lord, the two I have given you --

1 MR JUSTICE FRASER: You have given me 18352 and 18359.  
 2 MR DRAPER: Yes. Those are the transfer out and the  
 3 transfer in. They are surrounded on this spreadsheet by  
 4 two other records. They are not transfers. They  
 5 correspond to the value of the transfer but they are not  
 6 actually transfers. They perform a back office  
 7 reconciliation function that wouldn't be visible to  
 8 a subpostmaster. If Mr Latif had called up records in  
 9 his branch he would have seen the two transactions to  
 10 which I have referred you, he wouldn't see the  
 11 effectively inverse transaction that are only visible in  
 12 the back office systems.  
 13 MR JUSTICE FRASER: I see. All right and then go to the  
 14 next one.  
 15 MR DRAPER: The next one, Mr Latif, starts at row 25988. Do  
 16 you see that's a transaction performed by another one of  
 17 your assistants? Can you recall the name of that  
 18 assistant? I don't have the paper in front of me,  
 19 Mr Latif. Is that Mr Deacock?  
 20 A. Yes.  
 21 Q. So we see there --  
 22 A. Yes, he is an employee of mine.  
 23 Q. 25988, Mr Deacock on stock unit SP1, on 29 July 2015, at  
 24 11.49.19 performs a transfer out of the value of £2,000.  
 25 Do you see that?

1 A. Yes.  
 2 Q. And then if we go a couple of rows lower than that, at  
 3 25990 on here we see MLA001. Who is that, Mr Latif?  
 4 A. Pardon, LAA001?  
 5 Q. Yes, user IDMLA001.  
 6 A. That is Mohammad Latif, my brother.  
 7 Q. Am I right to say that he wasn't shown on the assistant  
 8 document that we saw?  
 9 A. He is a holiday relief and he was -- he should have been  
 10 on there. I can't remember ...  
 11 Q. Did you register him as an assistant with Post Office?  
 12 A. He has been registered with the Post Office, sir.  
 13 MR JUSTICE FRASER: If you can just finish your exercise.  
 14 MR DRAPER: Yes. So that's your brother then,  
 15 Mohammad Latif --  
 16 A. Yes.  
 17 Q. -- performing, Post Office says, a transfer in at 25990  
 18 on stock unit AA on the same date, 29 July 2015, at  
 19 11.50.30, about a minute after the transfer out, so  
 20 Post Office says this was a second successful transfer  
 21 between the two stock units in July but in the opposite  
 22 direction. Do you follow that?  
 23 A. Yes.  
 24 Q. On the basis of that, Mr Latif, Post Office says that  
 25 in July 2015 there were two transfers of £2,000 between

1 the stock units you identify, one in one direction and  
 2 one in the other, but that both of them succeeded  
 3 because there was both a transfer out and a transfer in?  
 4 A. Well, what's your definition of "succeeded"? What's the  
 5 cash figure? I mean I'm not sure I follow you, because  
 6 you're saying if you transfer in and transfer out, that  
 7 it works? That's not necessarily the case. The case it  
 8 works is where your cash declaration says that it has  
 9 worked. That's how you confirm that it worked.  
 10 Q. Mr Latif, I'm just dealing with your evidence. Your  
 11 evidence is that you performed a transfer out but then  
 12 the transfer in was not available on the second stock  
 13 unit to accept. I have just shown you documents that  
 14 Post Office will say that there was not such a transfer,  
 15 there was not a transfer for which there was  
 16 a transfer out but no transfer in. Do you follow that?  
 17 A. I follow that, but I'm still saying that there's  
 18 a glitch. We transfer stuff all the time and yes, most  
 19 of the time it works, but there are times when it didn't  
 20 work and that's what I'm saying.  
 21 Q. Ms van den Bogerd then says in her statement that she  
 22 has looked at the data for August 2015 and there were in  
 23 fact four transfers of £2,000 between the stock units  
 24 but those too were all successful, there was in every  
 25 case a corresponding transfer in for each transfer out.

65

1 Do you follow that?  
 2 A. I do.  
 3 Q. Do you accept that that is what the data would show, or  
 4 would you like me to take you through the data?  
 5 A. No, no, I accept.  
 6 Q. On the basis of that, Mr Latif, Post Office says there  
 7 was no failed transfer such as that described in your  
 8 witness statement and that you are simply wrong about  
 9 that, it never happened.  
 10 A. So you are calling me a liar?  
 11 Q. Mr Latif, you may be mistaken or you may be lying.  
 12 I put the question that it didn't happen.  
 13 A. Well, I state that they did.  
 14 Q. Notwithstanding, Mr Latif, that it is not shown on the  
 15 transaction records, do you say that those transaction  
 16 records are then wrong?  
 17 A. I believe so.  
 18 Q. Thank you.  
 19 I'm now going to move on, Mr Latif, to ask you about  
 20 the transaction correction issue in January 2018.  
 21 I have been asked to confirm with you that  
 22 the heading in your witness statement is a typographical  
 23 error and you meant to refer to transaction  
 24 acknowledgements, is that right?  
 25 A. Yes, TC, transaction acknowledgments.

66

1 Q. Sorry, I heard that as TC transaction acknowledgment.  
 2 Did you mean to say TA, transaction acknowledgment?  
 3 A. TA is transaction acknowledgment and TC is transaction  
 4 corrections, so it is two different things, sir.  
 5 Q. Yes. In paragraph 9 of your statement, if you could  
 6 look at that, that's {E1/1/2}, you say:  
 7 "... Camelot sent information to Horizon in relation  
 8 to scratchcards. Camelot sent this information to  
 9 Horizon twice."  
 10 A. Yes, sir.  
 11 Q. First question about that: by amendment to your  
 12 statement you now say that this was in  
 13 around January 2018 rather than March 2018.  
 14 A. Correct.  
 15 Q. What caused you to make that correction?  
 16 A. I had a look at the -- we hold the records for the  
 17 information in the office, so I had my assistants look  
 18 at the records, transaction logs and that's when  
 19 I confirmed that it was January rather than March.  
 20 (Inaudible) was logs in March as well. We made calls  
 21 effectively every month to Horizon help desk concerning  
 22 this issue.  
 23 Q. When do you say you asked your assistants to check about  
 24 the date?  
 25 A. Yes.

67

1 Q. Sorry, when do you say that happened?  
 2 A. It was after I made the initial statement, I was  
 3 checking.  
 4 Q. Roughly when, Mr Latif?  
 5 A. It would have been a few weeks ago, sir.  
 6 Q. So is it right that you didn't check those records from  
 7 the branch before making your witness statement?  
 8 A. No, I thought I was correct but I double checked and  
 9 made sure that actually in fact they were correct, those  
 10 (inaudible), so I was right but initial incident  
 11 happened in January when TA (inaudible) transaction  
 12 acknowledgement, the TC, the corrections, they came  
 13 in March.  
 14 Q. Okay. So you say, do you, that the TCs in relation to  
 15 these transaction acknowledgements came in March 2018?  
 16 A. Yes.  
 17 Q. And you say that's something you have checked from your  
 18 records?  
 19 A. Yes.  
 20 Q. Looking at paragraph 9, why is that put in such vague  
 21 terms, Mr Latif? What information are you talking about  
 22 in that paragraph?  
 23 A. Which paragraph, sir?  
 24 Q. Paragraph 9, starting "In or around January ..."?  
 25 A. Yes, the way the system works with Camelot and

68

1 Post Office is they have a contract with Camelot, is  
 2 that the Camelot machine predominantly is based on the  
 3 retail side of the business, so it's -- retail business  
 4 is the shop side. So, for example, a customer comes in,  
 5 does a transaction, buys the scratchcard or the lottery  
 6 ticket from us, that data is transmitted back to branch,  
 7 to the Post Office, the following morning. So say on  
 8 a Tuesday we perform transactions, on the Wednesday  
 9 morning a TA, which is a transaction acknowledgment,  
 10 will go to a branch, okay? So the money that was taken  
 11 in the retailer side is then accounted for in the  
 12 Post Office's system on our tills, so we have to put our  
 13 money in to the Post Office till and that's done  
 14 throughout the country at every Post Office that has  
 15 a Camelot machine installed at the branch.  
 16 Q. So in paragraph 9 what you are referring to is  
 17 a transaction acknowledgment sent to your branch by  
 18 Post Office --  
 19 A. Yes.  
 20 Q. -- relating to Camelot scratchcards, is that right?  
 21 A. Yes. I believe they made the mistake and sent out the  
 22 information twice to every branch up and down the  
 23 country and that's what we were told by the help desk.  
 24 Q. When do you say the help desk told you that, Mr Latif?  
 25 A. When we learned in January -- when we got two lots of

1 certain TAs.  
 2 Q. So you say you phoned immediately when you received two  
 3 sets of TAs, is that right?  
 4 A. Yes, sir. We automatically have to accept the TAs. You  
 5 can't not accept them. As soon as you log on in the  
 6 morning, the TAs are there.  
 7 Q. So do you say you phoned Post Office and said "You have  
 8 mistakenly sent me two transaction acknowledgements  
 9 rather than one"?  
 10 A. Yes.  
 11 Q. And they nonetheless told you to accept them, is that  
 12 your evidence?  
 13 A. No, sir, you have no choice but to accept them. If you  
 14 do not accept them you cannot continue to serve in your  
 15 branch during the day. You have to accept them.  
 16 There's no way round it.  
 17 Q. Mr Latif, why don't you mention this important telephone  
 18 call in your witness statement?  
 19 A. Well, we will make -- I can see we made lots of calls to  
 20 the helpline, so, I mean it was -- we also had a message  
 21 come through from Post Office saying that there was an  
 22 error, there was a glitch, the transaction was put  
 23 through twice, was sent twice to the branches and "We  
 24 are going to resolve it". The Post Office were aware of  
 25 it.

1 Q. What form do you say that notice took, Mr Latif?  
 2 A. I believe it was a memo view, which is an internal  
 3 communications system that the Post Office uses to  
 4 communicate to branches and it pops up on your screen on  
 5 the Horizon channel.  
 6 Q. And you say that this notice told you that Camelot had  
 7 made a mistake, is that right?  
 8 A. That's right, sir. No, it said there was a -- the  
 9 information was duplicated, so it was sent twice.  
 10 Q. And you were told that was Camelot's mistake, you say?  
 11 A. Well, they said it was a mistake. They are working with  
 12 Camelot to resolve the issue. Whose fault it is, I'm  
 13 not sure.  
 14 Q. Mr Latif, have you provided any notice that Post Office  
 15 sent you referring to a mistake involving Camelot that  
 16 you refer to in paragraph 10 of your witness statement?  
 17 A. I haven't, but that's quite easily accessible to  
 18 everybody. It's not a -- it's commonly available to the  
 19 Post Office.  
 20 MR JUSTICE FRASER: Mr Latif, is that different from the  
 21 item you have just referred to that pops up on the  
 22 screen, or is it just a different word to describe the  
 23 same thing?  
 24 A. Well, it's the same, it's called a memo view, sir,  
 25 my Lord.

1 MR JUSTICE FRASER: It's called a what, sorry?  
 2 A. It's called a memo view.  
 3 MR JUSTICE FRASER: Memo view.  
 4 A. M-E-M-O, V-I-E-W.  
 5 MR JUSTICE FRASER: So is your paragraph 10 talking about  
 6 the memo view, or is it talking about something  
 7 different?  
 8 A. That's it, that's what I'm talking about.  
 9 MR JUSTICE FRASER: That's what you are talking about.  
 10 A. Paragraph 10, yes.  
 11 MR JUSTICE FRASER: All right, back to you, Mr Draper.  
 12 MR DRAPER: Mr Latif, do you accept you might be  
 13 misremembering the things you describe in paragraphs 9  
 14 and 10?  
 15 A. No, a notice is a memo view, sir, that's the  
 16 communication we have with the Post Office.  
 17 Q. Do you say --  
 18 A. It's a one-way system -- it's a one-way system, sir, how  
 19 I explained. So if the people at Post Office want to  
 20 communicate to us something very quickly, that's the  
 21 system they use. So it's messages about procedural  
 22 changes, or anything that's about to expire, the  
 23 memo view comes to our screen and that happens  
 24 automatically and that goes to every branch up and down  
 25 the country, all the time.

1 Q. Do you say that you personally processed the transaction  
2 acknowledgements to which you refer in paragraph 9?  
3 A. The transaction acknowledgements would have been done by  
4 Christine Barnett. It's done when you first log -- when  
5 the first person logs in on stock unit AA the  
6 transaction screen pops up. The transaction  
7 acknowledgment, the TA pops up. That happens almost  
8 every day except for Sunday.  
9 Q. But you say you personally received the notice that you  
10 refer to in paragraph 10?  
11 A. The branch received the notice, sir, so whoever logs in,  
12 the first person to log in among the staff, or one of my  
13 colleagues, the notice will come in.  
14 Q. Was that you or one of your staff?  
15 A. I believe it may have been Christine -- it was  
16 Christine, Christine Barnett.  
17 Q. So is it right to say that everything in paragraphs 9  
18 and 10 are things that have been told to you by  
19 Ms Barnett?  
20 A. The memo view, sir, will come to us as well, it will  
21 come to me as well, sir. As soon as I log on I will get  
22 the memo view as well. So ...  
23 Q. I don't think that quite answered the question. Were  
24 you told these things by Ms Barnett, or do you say you  
25 personally saw them?

1 A. Well, my statement says information sent to Horizon, it  
2 does not say sent to me or Christine, sir.  
3 Q. I understand that. I'm asking which it is?  
4 MR JUSTICE FRASER: Mr Draper, I think you are  
5 misunderstanding his evidence. His evidence is that it  
6 pops up when each person logs in. Now, on the basis  
7 that he's got a separate login -- if you want to suggest  
8 an alternative method that the information is  
9 communicated, you should pursue that.  
10 MR DRAPER: Forgive me.  
11 Mr Latif, is your evidence that even after  
12 a transaction acknowledgment has been accepted, it still  
13 pops up on someone else's screen when they log in?  
14 A. No.  
15 MR JUSTICE FRASER: No, you were asking him about the  
16 notice, Mr Draper.  
17 MR DRAPER: I was asking him about both, my Lord.  
18 MR JUSTICE FRASER: Well, if you were, you were putting it  
19 together in one question. Would you like to -- you  
20 actually said "Were you told these things by Ms Barnett"  
21 and by "these things" you were talking about  
22 paragraph 10. Now, paragraph 10 includes the  
23 notice/memo view. So if you would just like to pursue  
24 it so that it is clear please so that you are not  
25 talking about one thing and he is asking questions about

1 another.  
2 MR DRAPER: Understood. I will put the question exactly as  
3 I put it before, my Lord.  
4 Is it right to say that everything in paragraphs 9  
5 and 10 are things that Ms Barnett told you?  
6 A. No.  
7 Q. So which bits of that evidence do you say are from your  
8 own personal knowledge?  
9 A. Well, sir, every branch for the last 17 years I have  
10 been working with the Post Office gets a TA from Camelot  
11 if they are a Camelot authorised branch, so that's  
12 standard procedure within the Post Office. I don't  
13 understand your labouring this point. It happens every  
14 day at every branch, to whoever logs in first gets the  
15 transaction acknowledgment to account for yesterday's  
16 takings that the Camelot machine has performed. Okay?  
17 The notice that I'm referring to as a memo view, every  
18 operator gets that memo view, irrespective. As soon as  
19 they log in, that memo view comes up automatically. So  
20 that's the notice that I'm referring to in section 10,  
21 sir. Have I made myself clear?  
22 Q. No, Mr Latif, you haven't answered the question. It is  
23 a really small question. It is not about how TAs work  
24 or how memo view works. Are you saying that you  
25 personally processed the transaction acknowledgment and

1 that you personally received the memo view message, or  
2 are you saying that these are things Ms Barnett told  
3 you?  
4 A. What I'm saying to you is that I performed the  
5 transaction, but Mrs Barnett will discuss it with me as  
6 well that it comes up twice. So that statement is true.  
7 You know, as soon as you log on it comes up  
8 automatically, the TA comes up automatically, whoever  
9 the first person to log on is, so we would -- you know,  
10 we communicate with each other in the branch all the  
11 time.  
12 Q. Mr Latif, paragraph 11 {E1/1/2} you say that  
13 a transaction correction was later received and that you  
14 accepted it, is that right?  
15 A. Yes, sir.  
16 Q. You said a few minutes ago that that was in March 2018,  
17 is that right?  
18 A. The transaction correction, again you have to accept,  
19 sir. And yes, that's correct.  
20 Q. You say in paragraph 11 that the TC didn't change the  
21 stock figure of scratchcards but Horizon showed an extra  
22 £1,000 of scratchcards in stock.  
23 A. Yes, sir.  
24 Q. You then say that means the transaction correction did  
25 not work. Can you explain what you mean by that phrase

1 "did not work"?

2 A. The transaction correction corrects -- was meant to

3 correct the stock that was wrongly assigned to us where

4 it was duplicated, so it should have reduced it down to

5 minus 50, so £500 worth of scratchcards rather than

6 £1,000 worth of scratchcards.

7 Q. Just to be clear, what you mean by "did not work" is

8 that it didn't resolve the problem in your branch. You

9 don't mean that there was something faulty at

10 a technical level with the transaction correction, you

11 mean that it worked technically but that it didn't

12 resolve the problem, is that right?

13 A. Well, it's the same thing, sir. If it didn't work, it

14 didn't -- it didn't do what's it's supposed to do, which

15 is to correct our stock figure. It didn't correct the

16 stock figure.

17 Q. I don't follow, Mr Latif. It did change the Horizon

18 stock level, didn't it?

19 A. What do you mean, sir?

20 Q. The figure on Horizon for what the stock level should be

21 changed when you put through the transaction correction,

22 didn't it?

23 A. No, as I say, my statement says that the correction was

24 £1,000, but it didn't work. The TC should have reduced

25 the stock, but it didn't. The TA added it twice, the TC

1 should have taken it away. The TC did not take it away.

2 Sometimes the TCs take them away, sometimes they add

3 them. You either get a credit, or you get an invoice.

4 So the TCs work in two separate ways.

5 Q. Okay, maybe it is unhelpful to focus on the word

6 "worked", but what you say is that the Horizon figure

7 for scratchcards went up by 1,000 but of course the

8 physical number didn't change. That's the point you're

9 making?

10 A. I think I may need to explain how that works. I think

11 you are getting confused. Can I just explain how

12 scratchcards work, your Honour?

13 MR JUSTICE FRASER: Well, I think I understand how they

14 work. I'm pretty sure Mr Draper does, but maybe

15 Mr Draper will just in summary form put it to you so

16 that you can agree it or disagree it.

17 Mr Draper.

18 MR DRAPER: It may be the best thing to do, Mr Latif, is to

19 get a short statement on this from a Post Office

20 witness.

21 MR JUSTICE FRASER: No, I don't think so.

22 MR DRAPER: Sorry, I mean to go to the statement and we can

23 agree the text.

24 MR JUSTICE FRASER: By all means if you have got one, yes.

25 MR DRAPER: If you can turn please to Ms van den Bogerd's

1 witness statement at {E2/5/8} and at paragraph 25 -- do

2 you see that, Mr Latif? Can you read paragraph 25 to

3 yourself please just in your head.

4 MR JUSTICE FRASER: That's about the PING fix, isn't it?

5 A. Okay.

6 MR JUSTICE FRASER: We were on transaction corrections.

7 MR DRAPER: I believe he wanted me to take him through how

8 one gets a TC for scratchcards and to what it relates.

9 MR JUSTICE FRASER: I don't believe he did, but we will let

10 him read that and then you can put your question.

11 Mr Draper, you're going to have to pay attention to

12 what his answers are. This is incredibly slow going.

13 How much longer are you going to be with the witness?

14 MR DRAPER: I would say about 15 to 20 minutes.

15 MR JUSTICE FRASER: All right.

16 (Pause).

17 MR DRAPER: Then, Mr Latif, over the page {E2/5/9} --

18 A. Okay.

19 Q. -- Ms Van den Bogerd at 26.6 is referring to the process

20 you described earlier, that scratchcards are first

21 activated on the lottery terminal and then at 26.7, if

22 you could read that to yourself, she describes the

23 process for TAs and I'm just putting this to you because

24 I think we agree about that process, so if you could

25 read 26.7 to yourself please.

1 (Pause).

2 Are you there yet, Mr Latif, the end of

3 paragraph 26.7?

4 A. I am.

5 Q. What she says there is right, isn't it?

6 A. She does.

7 Q. Can I ask you to then go forward to paragraph 98, which

8 is at {E2/5/24}. What Ms van den Bogerd says there is

9 that the problem in your branch started -- I'm

10 summarising, but the problem in your branch started when

11 your branch received two TAs on 18 January 2018 and she

12 says that they were mistakenly negative in value when

13 they should have been positive. Do you follow that?

14 A. Yes, sir.

15 Q. Do you accept --

16 A. Positive has corrected a negative (inaudible) is what we

17 have to put the money into the Post Office till.

18 Q. Precisely. And she is explaining that was Post Office's

19 mistake when it made the TA. Someone put a minus when

20 they shouldn't have. Do you follow?

21 A. Yes, sir.

22 Q. And she says that's what started this problem in your

23 branch. Do you accept that?

24 A. I do.

25 Q. The mistake in the transaction acknowledgment would have

1 been apparent and obvious from looking at the  
 2 transaction acknowledgment itself, wouldn't it?  
 3 A. I don't follow.  
 4 Q. Well, if the transaction acknowledgment was negative  
 5 rather than positive you would see that --  
 6 A. Yes.  
 7 Q. -- when you looked at it?  
 8 A. We would look into our stock figure and yes, our stock  
 9 figure would be negative, so in this case the £10  
 10 scratchcard, which is what that TA refers to, it would  
 11 have been negative.  
 12 Q. Yes. I think you're saying after the TA you had  
 13 a negative balance of scratchcards on Horizon, is that  
 14 right?  
 15 A. Correct.  
 16 Q. But that happened, Mr Latif, because the TA was negative  
 17 and I'm suggesting that that would be obvious from  
 18 looking at the TA. Do you follow?  
 19 A. Well, yes, because we -- it was done twice. It would  
 20 have been obvious, yes, it would be a negative figure,  
 21 but what you're saying about -- what Mrs Van den Bogerd  
 22 is saying is that the transaction was done twice, the TA  
 23 was done twice in error. So our stockholding would gone  
 24 negative.  
 25 Q. We agree that point, Mr Latif. Your stockholding for

81

1 scratchcards went negative. It did that because of the  
 2 negative TA. That's common ground.  
 3 A. Yes.  
 4 Q. Ms van den Bogerd is not saying that there was a mistake  
 5 made duplicating a transaction acknowledgment, she is  
 6 just saying it was negative when it should have been  
 7 positive and I think you have agreed that?  
 8 A. Yes, I do. When we (inaudible) like that to the shop,  
 9 it is activated on a lottery machine, that's a message  
 10 that goes back that means we have to pay for that  
 11 scratchcard to the Post Office. Okay? And that got  
 12 negative, so when we do the TA we then have to send that  
 13 scratchcard to the system to make it positive, manually.  
 14 We put the money in at the same time, so the TA was sent  
 15 in twice.  
 16 Q. Okay. We will disagree on that and I will come back to  
 17 the precise mechanism --  
 18 A. Well, you can check.  
 19 Q. -- in a moment. The point I wanted to make -- and it is  
 20 no big criticism, Mr Latif, but the point is you were at  
 21 your branch required to check the TAs and Post Office  
 22 made a mistake and you missed the mistake; is that fair?  
 23 A. How do you say we missed the mistake? Because memo view  
 24 said the Post Office will issue a TC, a transaction  
 25 correction, to correct their mistake. What I'm saying

82

1 is that that TC didn't work. Our stock figure stayed,  
 2 where it should have basically gone into the positive,  
 3 so rather than being negative it should have gone back  
 4 to zero and it did not (inaudible) and that's why the TC  
 5 failed.  
 6 Q. Can I ask you then to look at paragraph 99 of  
 7 Ms van den Bogerd --  
 8 MR JUSTICE FRASER: Before you do that, Mr Draper, it is now  
 9 5 past 1. I don't know if you are paying any attention  
 10 to the time, but what's your attention, to plough on  
 11 until you have finished, or to take stock, or -- we have  
 12 to in some way address the fact this is a time limited  
 13 trial.  
 14 MR DRAPER: Of course, my Lord. My intention was to see  
 15 whether Mr Latif agrees with paragraph 99 because that  
 16 then will determine how much more I need to show him.  
 17 MR JUSTICE FRASER: Well, in terms of timing for your  
 18 cross-examination?  
 19 MR DRAPER: Oh, forgive me. 15 to 20 minutes.  
 20 MR JUSTICE FRASER: Well, it was 15 to 20 minutes when  
 21 I asked you 15 to 20 minutes ago.  
 22 MR DRAPER: Well then --  
 23 MR JUSTICE FRASER: Is your intention --  
 24 MR DRAPER: It will have to be, my Lord.  
 25 MR JUSTICE FRASER: Is your intention just that we sit here

83

1 until you have finished and then we have a break, or we  
 2 have a short break for the transcribers now for  
 3 ten minutes and then come back?  
 4 MR DRAPER: No, my Lord. My intention was to show Mr Latif  
 5 paragraph 99 which will then determine how much more  
 6 cross-examination is needed on this area and then break.  
 7 MR JUSTICE FRASER: Right, we will do that then.  
 8 MR DRAPER: Mr Latif, can you read to yourself paragraph 99  
 9 of Ms van den Bogerd's statement please.  
 10 (Pause).  
 11 A. Yes, okay.  
 12 Q. Do you agree with what she says there about what  
 13 happened next?  
 14 A. I agree that you cannot roll over with a negative stock  
 15 figure, Horizon does not allow you to do that.  
 16 Q. Do you agree with the rest of it?  
 17 A. I do.  
 18 Q. Thank you.  
 19 That is an appropriate moment, I think, my Lord.  
 20 MR JUSTICE FRASER: Right and you think another 15 to  
 21 20 minutes.  
 22 MR DRAPER: I do.  
 23 MR JUSTICE FRASER: Right, Mr Latif, I know you are in  
 24 a different time zone. Usually we would have a break  
 25 now in the middle of the day. Can you tell me what the

84

1 time is there please? What time of day is it?  
 2 A. It is just going on 10 past 6, your Honour.  
 3 MR JUSTICE FRASER: In the evening, yes?  
 4 A. In the evening, yes, your Honour.  
 5 MR JUSTICE FRASER: Now, are you all right to have a short  
 6 break for about 40, 45 minutes and come back, or would  
 7 you prefer to keep going now until we finish your  
 8 evidence?  
 9 A. Your Honour, I would really appreciate your help if we  
 10 continue to finish so I can get back.  
 11 MR JUSTICE FRASER: All right. Well, what we're going to do  
 12 then is just have a five minute break for the shorthand  
 13 writers and then we're going to continue. On the basis  
 14 that this gentleman is on the videolink from Pakistan,  
 15 Mr Draper, I think that's the best thing to do. So if  
 16 I can say we have a break until let's say quarter past  
 17 and then we will come back and then Mr Draper is going  
 18 to complete your evidence, all right?  
 19 A. Thank you.  
 20 MR JUSTICE FRASER: So that's about six minutes.  
 21 (1.10 pm)  
 22 (Short Break)  
 23 (1.15 pm)  
 24 MR JUSTICE FRASER: Mr Draper.  
 25 MR DRAPER: Mr Latif, before the break you agreed with

85

1 paragraphs 98 and 99 of Ms van den Bogerd's witness  
 2 statement {E2/5/24}.  
 3 A. Yes.  
 4 Q. I wonder whether you could read to yourself also  
 5 paragraph 100 and tell me whether you agree with that  
 6 please.  
 7 (Pause).  
 8 A. Okay, yes.  
 9 Q. You agree that, Mr Latif?  
 10 A. Yes, sir.  
 11 Q. Can I ask you then to read paragraph 101, starting at  
 12 the bottom of the page and please do indicate when you  
 13 would like the page turned.  
 14 (Pause).  
 15 A. Okay, page please {E2/5/25}.  
 16 (Pause).  
 17 Q. Have you done with paragraph 101, Mr Latif?  
 18 A. I am.  
 19 Q. Do you agree with that paragraph as well?  
 20 A. I do.  
 21 Q. Do you then agree, Mr Latif, with the conclusion that  
 22 Ms van den Bogerd draws in paragraph 102? If you read  
 23 that to yourself please.  
 24 (Pause).  
 25 A. Okay.

86

1 Q. Do you agree that that's the position, Mr Latif: it was  
 2 a confusing situation, but once the data has all been  
 3 analysed, Ms van den Bogerd is right about what  
 4 happened?  
 5 A. Can I just confirm, there was an audit done in September  
 6 of this year, an audit by a Post Office trained auditor,  
 7 and my stockholding was still showing negative. And  
 8 a Jane Lawrence is the auditor and she has -- still  
 9 could not resolve this matter, so the problem hasn't  
 10 gone away, the problem is still there. And there have  
 11 been a number of calls to the helpline to resolve that  
 12 negative stock and it hasn't worked. They haven't come  
 13 back with a response.  
 14 Q. Mr Latif, the evidence of Ms van den Bogerd that you  
 15 have just agreed is correct, at least up to  
 16 paragraph 101, is that the initial mistake by  
 17 Post Office caused the branch to have a negative stock  
 18 level, you agree?  
 19 A. Yes, correct.  
 20 Q. Your branch then carried out a sales reversal that  
 21 addressed the stock level but created a cash surplus;  
 22 that's right?  
 23 A. Correct.  
 24 Q. The transaction correction from Post Office then  
 25 adjusted the stock level but because of your reversal it

87

1 didn't put the branch back how it should have been. Do  
 2 you follow that?  
 3 A. Yes, okay, go on.  
 4 Q. So in effect the transaction correction cancelled out  
 5 the mistaken transaction acknowledgment, do you agree  
 6 with that?  
 7 A. That's what it's supposed to do.  
 8 Q. But the problem was that because of the reversal in your  
 9 branch, you would need to undo that reversal before the  
 10 branch would be back as it should have been? That's  
 11 Ms van den Bogerd's evidence.  
 12 A. I still state that an independent audit was done by the  
 13 Post Office, a Mrs Jane Lawrence, in September 2018 the  
 14 stockholding was still negative and as the branch was  
 15 handed over to another subpostmaster that is going to be  
 16 investigated, it's going to be investigated. If you are  
 17 now coming back with this evidence, I still say that  
 18 there is a problem somewhere and I don't know what's  
 19 happened but we have still got a negative stock figure  
 20 within our branch.  
 21 Q. Mr Latif, that's inconsistent with the evidence that you  
 22 have just agreed is correct about what the transaction  
 23 correction did, isn't it?  
 24 A. Well, that's what it's supposed to do, but what it did  
 25 is a different thing. I mean that's what it is supposed

88

1 to do.

2 Q. Why do you not mention the audit in your witness  
3 statement?

4 A. Well, I'm just saying that the stock figure is wrong and  
5 the till is wrong, so it's a fact. I mean you should  
6 know, the Post Office should know they did an audit of  
7 this. I have complained, we made a number of calls to  
8 the helpline. We rang Camelot as well to address the  
9 issue and they just haven't got back to us. I told them  
10 we had an audit coming, "You need to do it before the  
11 audit" and if you check the call logs there will be  
12 a number of call logs to the helpline about these  
13 scratchcards. I'm sure you have those.

14 Q. Mr Latif, what Post Office will submit about this  
15 problem with transaction acknowledgements and  
16 transaction corrections in 2018 is that there were  
17 a series of human errors that led to a problem in your  
18 branch that was quite hard to get to the bottom of, but  
19 that did not involve any computer bug or error in  
20 Horizon. Do you agree?

21 A. I agree, but the fact remains that an independent audit  
22 happened and the stock we were holding was still  
23 negative, so how do you explain that, sir?

24 Q. Mr Latif, I'm sorry to go back. It's not entirely clear  
25 from your answer whether you did agree with me or not.

89

1 Do you agree that the problem with transaction  
2 acknowledgements and transaction corrections can be  
3 explained by human errors and that there was not a bug  
4 or error in Horizon involved in that problem?

5 A. The human error is when the Post Office, or Camelot,  
6 PINGed the information to our terminal, duplicated the  
7 information. That's the human error. We then, to  
8 balance the office, had to do a number of transactions  
9 to correct that cock-up, if I may use that word,  
10 my Lord. So, yes, there was a mistake that was made,  
11 but I still stress it was on Post Office's side, or  
12 Camelot who are their partner.

13 So the fact remains there was an independent audit  
14 happened by your Post Office -- by Post Office's  
15 auditor, her recommendation was that they look into it  
16 as is (inaudible) the strategy is still there. And  
17 there were a number of calls to the helpline pleading  
18 with them to resolve this issue before the audit and  
19 there will be a complete trail of that, sir.

20 Q. I'm going to leave the transaction correction issue now  
21 and turn to some final points.

22 At paragraphs 15 and 18 of your witness statement  
23 {E1/1/3}, Mr Latif, you make a number of very general  
24 allegations about Horizon. Do you see those?

25 A. Yes, sir.

90

1 Q. I can't meaningfully challenge you on those because  
2 there is no detail for me to engage with, but I just  
3 formally make clear that Post Office does not accept  
4 that what you say there is correct. Do you follow that?

5 A. Okay, I accept the Post Office explanation, but that's  
6 not my experience. I think you have to accept that as  
7 well please.

8 Q. Mr Latif, we saw earlier a mistake in your branch. Do  
9 you remember the remming error with the cheque? Do you  
10 recall seeing that?

11 A. Yes, sir.

12 Q. If we could go back to the call log please at  
13 {F/1829.1}, and if we could go please to row 172.  
14 Mr Latif, this is a record of a call from your branch,  
15 Caddington, on 26 March 2018 and we get that from  
16 column D and the content of the call is shown at  
17 column M and it says there at M:  
18 "Thursday: customer wanted to withdraw £1,000 but  
19 did as a deposit so now £2,000 down."

20 A. Yes.

21 Q. So what happened there, Mr Latif, was the assistant  
22 processed on Horizon a deposit for £1,000, that's right?

23 A. Can I just stop you there. That incident, a customer  
24 came in, distracted the counter clerk, okay, made  
25 comments about her, made her feel uneasy. There were

91

1 two buttons next to each other on Horizon, one to the  
2 left, one to the right, so she pressed the wrong button,  
3 okay. We -- instead of withdrawing money we put money  
4 into his account. So rather than taking £1,000 out of  
5 his account, in fact the button hit was the deposit  
6 button, so we put £1,000 into his account. So the  
7 shortfall was £2,000. That same night when we did the  
8 cash declaration, we realised the mistake, we checked  
9 the CCTV and proved that the customer -- in fact the  
10 wrong transaction occurred. I personally contacted the  
11 customer, the customer refunded us the money and that is  
12 the correct procedure followed to make sure that the  
13 money was put back into the system.

14 Q. Mr Latif, prior to that resolution that you were able to  
15 reach there will have been a £2,000 shortfall within the  
16 branch, wouldn't there?

17 A. (Inaudible) yes, but before the next balancing period.

18 Q. If we go --

19 A. The customer put the money back, sir.

20 Q. If we can go to row 182 please. We see there a mistake  
21 where someone -- you or one of your assistants -- has  
22 accidentally entered a council tax bill for £13 as £130,  
23 so what I would call a miskey error.

24 A. Yes, sir.

25 Q. So it's fair to say, isn't it, Mr Latif, that there were

92



1 errors and mistakes in this your branch of that kind  
 2 that could lead to shortfalls?  
 3 A. I would say that every branch has shortfalls, sir.  
 4 Everybody is human. We all make mistakes, but most  
 5 mistakes are corrected. However, with software glitches  
 6 you cannot correct those.  
 7 Q. One conclusion point, Mr Latif. Do you accept that  
 8 everything you complain of in your witness statement can  
 9 be explained by human errors, whether Post Office  
 10 errors, or errors in your branch, and might not have  
 11 involved any bug or error in Horizon?  
 12 A. No, no. I would say some errors are human error, but  
 13 there is also a bug in the Post Office system and that's  
 14 my evidence, sir.  
 15 Q. Just one short last point, Mr Latif, just to confirm.  
 16 Post Office's position is that you ceased to be the  
 17 subpostmaster of the Caddington branch in September of  
 18 last year. That's right, isn't it?  
 19 A. Correct.  
 20 Q. Was it --  
 21 A. That's -- the date it happened -- 27 September is when  
 22 the audit was.  
 23 Q. It doesn't matter, but Post Office records suggest it  
 24 was the 26th, but it doesn't matter, Mr Latif.  
 25 A. Yes.

1 Q. Is it therefore a mistake in your witness statement that  
 2 you failed to correct when you say in paragraph 1 that  
 3 you are currently the subpostmaster?  
 4 A. I did discuss that with the -- my solicitor and they  
 5 said because the incident happened while I was in charge  
 6 it didn't really matter.  
 7 Q. Thank you, Mr Latif.  
 8 MR JUSTICE FRASER: Re-examination?  
 9 MR GREEN: My Lord, I'm just going to ask -- because he's  
 10 got a four hour drive home I'm going to ask two --  
 11 MR JUSTICE FRASER: I'm not encouraging any.  
 12 MR GREEN: But I need to do some.  
 13 MR JUSTICE FRASER: I'm not stopping you, but he has been in  
 14 the witness box for three hours.  
 15 MR GREEN: Precisely. So, my Lord, I was just going to  
 16 explain, I'm asking two indicative questions.  
 17 MR JUSTICE FRASER: Yes.  
 18 Re-examination by MR GREEN  
 19 MR GREEN: Could you be shown the transcript please at  
 20 page 40, line 15. Sorry, Mr Latif, just bear with us  
 21 a second. We're just trying to find the transcript --  
 22 MR JUSTICE FRASER: You can just read out the question and  
 23 answer if you want.  
 24 MR GREEN: At page 40, line 15 {Day2/40:15} Mr Draper asked  
 25 you:

1 "Question: If we could call up the call log  
 2 please ..."  
 3 Which is at 1829.1, which we will look at  
 4 in a moment. And then it says:  
 5 "Question: ... row 89 and looking over to column D,  
 6 that gives a date of 29 June 2015 which is the first  
 7 entry on this log for June?"  
 8 And you will remember his Lordship spotted that  
 9 there were some dates which were out of order. Could  
 10 the operator please go to that document 1829.1  
 11 {F/1829.1}. And could you please enable editing and  
 12 filter by date please, sort by date, sort and filter,  
 13 custom sort, sort by created date. "Okay". And please  
 14 can you then look at row 95. Can you see that's  
 15 actually 22 June?  
 16 A. Correct.  
 17 Q. And if we go across to the right we can see in rows L  
 18 and M the caller is identified as Chris and it says:  
 19 "Customer rang as she is trying to complete  
 20 an existing reversal on a rem in. She is using the  
 21 session ID and it is not accepting and coming up with an  
 22 error message 'unable to reserve as remmed as product in  
 23 AD'"  
 24 Do you have any recollection as at today what that  
 25 was about?

1 A. To be perfectly honest, I don't.  
 2 Q. Okay, thank you.  
 3 Then could we just use the duplicate of that  
 4 spreadsheet please that you had, the unfiltered one.  
 5 MR JUSTICE FRASER: Whereabouts are we going?  
 6 MR GREEN: We're going to be going to row 167, my Lord, in  
 7 the original version.  
 8 If we can go down to row 167 very kindly and look at  
 9 167, that's 25 January 2018.  
 10 A. Okay.  
 11 Q. Now, Mr Latif, you mentioned there were a number of  
 12 calls about the issue.  
 13 A. Yes. Yes, sir.  
 14 Q. Can we go across to row M first please. Let's pause,  
 15 "Description":  
 16 "TC received for launch of £10 x 100 scratchcard  
 17 games ... only received 50 ... if we accept the TC, will  
 18 cause a discrepancy?"  
 19 A. Yes.  
 20 Q. Can you remember what that was about?  
 21 A. That's it, that's the -- the thing we discussed earlier  
 22 on.  
 23 Q. Can you go to the right to column U please, "Resolution  
 24 details", we have only got a certain amount of text in  
 25 this box. It says:

1 "Sent below email to P&BA team:  
 2 "Good afternoon, I have received a call from  
 3 0561347 ..."  
 4 Is that your FAD code?  
 5 A. That is my branch, sir, yes, my FAD code.  
 6 Q. "... Caddington office, disputing the TC they received  
 7 this morning relating to the issue of the £10 game 1100  
 8 scratchcards."  
 9 I think that should say 100 scratchcards, should it?  
 10 A. It should say 100, sir.  
 11 Q. Okay, just a miskeying error.  
 12 "The TC received says that they should have had ..."  
 13 Can you remember what came back?  
 14 A. That is the problem: nothing came back from Camelot.  
 15 And again we kept chasing them, we kept chasing the  
 16 Post Office and nothing came back until September the  
 17 audit happened. Thank you, sir.  
 18 Q. Thank you very much, Mr Latif.  
 19 I don't know whether his Lordship has any questions?  
 20 Questions from MR JUSTICE FRASER  
 21 MR JUSTICE FRASER: I just have a couple of questions which  
 22 will be quite quick.  
 23 I think you said the audit was carried out -- was  
 24 the lady called Jane Lawrence?  
 25 A. She was, my Lord.

97

1 MR JUSTICE FRASER: Jane Lawrence. And when the audit  
 2 happened in September 2018 was Mr Jando still your line  
 3 manager, or was it somebody else?  
 4 A. No, Navjot still was just there.  
 5 MR JUSTICE FRASER: All right. Thank you very much for  
 6 giving up so much time and being cross-examined on the  
 7 videolink and that's now the end of your evidence.  
 8 A. Thank you, sir. Thank you, my Lord. Thank you for your  
 9 time.  
 10 MR JUSTICE FRASER: Right. We're going to come back at  
 11 quarter past 2. There's going to have to be a somewhat  
 12 different approach in terms of timing. We are supposed  
 13 to have three possibly four witnesses today. I don't  
 14 think -- if the other witnesses take as long as that  
 15 witness we're just going to massively run out of time.  
 16 Also I would have thought things like a notice or  
 17 a memo view ought really to be, if they are contentious,  
 18 explored in advance. I imagine the Post Office will be  
 19 able to produce a list of the memo views that were sent  
 20 out in January 2018. I would like that to be done  
 21 please. I'm not going to make an order but we will  
 22 revisit that on Wednesday morning and if it is going to  
 23 be difficult then I can have an explanation then and  
 24 I might make an order, but there's no point having  
 25 disputes of fact where there are none, because there are

98

1 enough genuine disputes of fact in this case it seems to  
 2 me.  
 3 We will come back at quarter past 2. So who is your  
 4 next -- just remind me your next witness?  
 5 MR GREEN: It is Mr Tank, my Lord.  
 6 MR JUSTICE FRASER: Mr Tank and then after that if we reach  
 7 them it is one of the --  
 8 MR GREEN: Anup Patny.  
 9 MR JUSTICE FRASER: Which is Mr Patny senior.  
 10 All right, so quarter past 2.  
 11 (1.40 pm)  
 12 (The luncheon adjournment)  
 13 (2.15 pm)  
 14 MR GREEN: My Lord, I'm going to call Mr Tank, if I may.  
 15 MR JAYESH TANK (affirmed)  
 16 Examination-in-chief by MR GREEN  
 17 MR GREEN: Mr Tank, there should be a witness bundle there  
 18 in front of you.  
 19 A. Yes.  
 20 Q. If you turn to tab 6 please {E1/6/1} you should see  
 21 a witness statement there with your name on it.  
 22 A. That's right.  
 23 Q. And if you go to page 3 of that witness statement  
 24 there's a signature {E1/6/3}. Is that your signature?  
 25 A. It is.

99

1 Q. And do you believe the contents of that statement to be  
 2 true, subject to what you have dealt with in your  
 3 subsequent one?  
 4 A. Absolutely.  
 5 Q. Can we look please at your supplemental statement which  
 6 is tab 11 {E1/11/1}.  
 7 A. Yes.  
 8 Q. If we go over to page 2 {E1/11/2}, you deal there with  
 9 having read Ms van den Bogerd's second witness statement  
 10 and enquiries that you then followed up in the light of  
 11 that?  
 12 A. Yes.  
 13 Q. And you have then dealt with the £195.04 issue she  
 14 referred to in 2011?  
 15 A. Yes.  
 16 Q. And then you have dealt with the £600 issue and you have  
 17 said there it was in 2014.  
 18 A. Yes.  
 19 Q. You have originally said that was 2011.  
 20 A. Correct.  
 21 Q. Subject to those matters do you believe these statements  
 22 together to be true?  
 23 A. I do.  
 24 Q. I'm most grateful.  
 25 Cross-examination by MR HENDERSON

100

1 MR HENDERSON: Mr Tank, good afternoon.  
 2 A. Good afternoon.  
 3 Q. Hopefully you can see the screen to your right which has  
 4 the documents on it. Is that clear enough for you  
 5 there?  
 6 A. Yes.  
 7 Q. Great. Can you first of all just tell us a little bit  
 8 about the nature of the branch where you were the  
 9 subpostmaster.  
 10 A. Of course, we were a two-counter rural post office. We  
 11 offered almost the entire suite of Post Office products  
 12 and services, everything apart from the AEI, identity  
 13 checking machine. I considered it to be a busy branch.  
 14 It was a high turnover, lots of cash coming in, lots of  
 15 cash going out, a full range of transactions as well.  
 16 Q. And is it a retail premises as well?  
 17 A. It was -- we had a small retail premises attached to the  
 18 post office and that sold gifts, cards, stationary.  
 19 Q. And there are two counters, you said?  
 20 A. Yes.  
 21 Q. And so how many assistants did you have?  
 22 A. Over the course of ...  
 23 Q. Generally?  
 24 A. Generally it would just be myself, my wife and possibly  
 25 one other member of staff.

101

1 Q. Right. Now, you have given two witness statements, as  
 2 you have just been taken to, and you have dealt with  
 3 three events. There is a power cut which you say led to  
 4 a loss of £600?  
 5 A. Yes.  
 6 Q. A shortfall of £195.04?  
 7 A. Yes.  
 8 Q. And you have some observations about label transactions?  
 9 A. Yes.  
 10 Q. So I want to deal with each of those in turn.  
 11 A. Okay.  
 12 Q. First of all, in your second witness statement which you  
 13 provided a few weeks ago you tell us that when you saw  
 14 Ms van den Bogerd's evidence responding to your first  
 15 statement you thought you would have a look at the forum  
 16 group that you used to use?  
 17 A. That's correct.  
 18 Q. And you call that the list?  
 19 A. Yes.  
 20 Q. Is that something that's notorious amongst  
 21 subpostmasters?  
 22 A. I wouldn't call it notorious.  
 23 Q. Well-known?  
 24 A. Well-known, yes.  
 25 Q. Can you tell me, can you tell us, tell his Lordship,

102

1 a little bit about what that forum was used for?  
 2 A. The forum, it was just a space where subpostmasters  
 3 could share information, knowledge, advice.  
 4 Q. If the operator could go to {F/1257.1}. This I think is  
 5 the extracts of the forum that you attached to your  
 6 second witness statement?  
 7 A. Yes.  
 8 Q. And if we could just scroll through that -- I will come  
 9 back to some individual entries, but just scroll through  
 10 that. We can see -- actually just before we scroll  
 11 through, I assume your username is jaytank23, is that  
 12 right?  
 13 A. That's correct.  
 14 Q. And if we just page down -- I will come back to that  
 15 particular entry, but if we just page down just to get  
 16 a feel for the sort of thing that's being said, so  
 17 people come on and they say "I've got a bit of a problem  
 18 can you help" and other people chip in and say "The same  
 19 thing happened to me" and so forth?  
 20 A. Correct.  
 21 Q. How often did you personally post things on the forum do  
 22 you think?  
 23 A. Not very often.  
 24 Q. Would you generally post whenever you had a problem?  
 25 A. No.

103

1 Q. Some of the time when you had a problem?  
 2 A. Some of the time, yes.  
 3 Q. How often did you look at it?  
 4 A. Every day.  
 5 Q. Every day.  
 6 A. Yes.  
 7 Q. So you were well aware that this was something which was  
 8 relevant to the nature of issues being faced by  
 9 postmasters?  
 10 A. Yes.  
 11 Q. And when you prepared your first witness statement you  
 12 obviously knew this resource existed, didn't you?  
 13 A. I did.  
 14 Q. And it is plain that it is relevant to your evidence,  
 15 isn't it?  
 16 A. It is.  
 17 Q. Why didn't you think to look for this material when you  
 18 were preparing your first witness statement?  
 19 A. Because my first witness statement was I think short,  
 20 brief, and it was just my way of -- I didn't really  
 21 fully research the whole background regarding it, I just  
 22 put my statement in.  
 23 Q. Can I just press you a little bit on that. You  
 24 understand that what's being said in this case, by you  
 25 amongst many others, is that you carried out certain

104

1 very specific actions which you did correctly and that  
 2 the Post Office is at fault, or the Horizon system is at  
 3 fault?  
 4 A. Yes.  
 5 Q. So it is important, isn't it, to have been precise in  
 6 the evidence that you give?  
 7 A. Yes.  
 8 Q. And I'm just wondering why you didn't make some effort  
 9 to find what was plainly a relevant document in putting  
 10 forward what you agree to be the need for precise  
 11 evidence?  
 12 A. Because I didn't -- I didn't feel that my information in  
 13 my initial witness statement was going to be taken any  
 14 further, so I -- it wasn't as important as it now has  
 15 become.  
 16 Q. Were you asked to look for relevant documents?  
 17 A. Yes.  
 18 Q. And what effort did you make to find them?  
 19 A. I kept all my Post Office sort of related paperwork in  
 20 a box file and that's -- when I was asked to look for  
 21 evidence I went strictly to that box file and that's  
 22 where I sourced all my information from.  
 23 Q. Can we look at your second witness statement {E1/11/2}  
 24 in paragraph 6. Your evidence there is you hadn't  
 25 looked at this previously:

105

1 "... as I did not think I would be able to access  
 2 the forum group and it did not seem relevant."  
 3 Can you just explain how on earth you could conclude  
 4 that it wouldn't seem relevant?  
 5 A. Sorry, can you ask the question again.  
 6 Q. How did you reach the conclusion that the forum posts  
 7 would not be relevant?  
 8 A. I didn't reach that conclusion.  
 9 Q. Well, you say in paragraph 6, Mr Tank:  
 10 "... I did not think I would be able to access the  
 11 forum group and it did not seem relevant."  
 12 I'm just wondering how you reached that conclusion?  
 13 A. Because when I made my first initial witness statement  
 14 I wasn't aware of £195.04 loss, that information only  
 15 came to light after reading Ms van den Bogerd's  
 16 statement.  
 17 Q. But you were putting forward evidence, Mr Tank, about  
 18 various matters including a number of matters that you  
 19 now say you got the date wrong in relation to?  
 20 A. I wasn't aware that my first initial witness statement  
 21 was evidence. I thought it was just a witness  
 22 statement. I thought ... yes, that's what I thought.  
 23 I didn't think it was --  
 24 Q. Is your evidence that you didn't take care over the  
 25 preparation of your first witness statement?

106

1 A. I did.  
 2 Q. But not much?  
 3 A. It was very general. My original witness statement --  
 4 I was just trying to get the point across -- because  
 5 I was referring back to my memory as well, I couldn't  
 6 realise the importance of what was important as -- it is  
 7 only subsequently after finding the information and  
 8 having -- being able to go back into -- it was only  
 9 a few weeks ago that I managed to get back into the  
 10 forum. I left my post office in 2016, so I stopped  
 11 visiting the forum.  
 12 Q. Right. Ms van den Bogerd's statement is dated  
 13 16 November 2018. You can take that from me. We can  
 14 look at it, but take that from me. And your second  
 15 statement that you have just referred to is dated  
 16 27 February 2019, so just over three months later, after  
 17 Ms van den Bogerd's statement. When did you first think  
 18 to look at the forum?  
 19 A. It would have been a matter of weeks ago. I can get  
 20 more specific if I go into my email history.  
 21 Q. All right, well, let's turn now to the power cut.  
 22 I would like to ask you some questions about the power  
 23 cut.  
 24 A. Okay.  
 25 Q. And there's some confusion about this, at least on my

107

1 part which may be my fault, but let me go through it in  
 2 the way that I understand it.  
 3 Could we first of all have a look at your first  
 4 witness statement at {E1/6/3} and we can see there that  
 5 that was signed on 28 September 2018 and on the first  
 6 page, page 1 of that {E1/6/1}, you say the information  
 7 is true to the best of your knowledge and belief and in  
 8 paragraph 6, which is on the second page {E1/6/2}, you  
 9 give evidence that a power cut occurred and that while  
 10 you could not recall the specific date, it "definitely  
 11 occurred in or around 2010-2011". Do you see that?  
 12 A. Yes.  
 13 Q. Now, why were you able to say that it definitely  
 14 occurred in those dates?  
 15 A. Because when I went to the box file that I mentioned  
 16 earlier there would have been a handwritten note  
 17 somewhere in amongst that that would refer to that  
 18 incident and that's what led me to believe that that was  
 19 the particular date.  
 20 Q. You now say -- and we're only talking about the £600  
 21 here, all right? The incident relating to the £600.  
 22 Do you agree?  
 23 A. I think so, yes.  
 24 Q. You now say that that event that you describe in your  
 25 first witness statement did not in fact take place in

108

1 2010 to 2011, but actually took place three or four  
 2 years later on 16 September 2014. That's your evidence  
 3 I think?  
 4 A. I -- yes.  
 5 Q. Can you just assist with how you came to make that  
 6 error? It's a big lump of time, isn't it? There's  
 7 a big, big difference, a four year difference -- three  
 8 or four year difference. How did you come to make that  
 9 error?  
 10 A. I just must have misjudged it. It was a failing in my  
 11 recollection.  
 12 Q. Anyway, your evidence, as I understand it -- I'm not  
 13 sure that this is right but I want to put it to you  
 14 fairly. Your evidence as I understand it is that you  
 15 say that that is the only mistake you made in relation  
 16 to the alleged loss of £600. In every other respect the  
 17 facts set out in your first witness statement you say  
 18 are accurate, is that right?  
 19 A. Yes.  
 20 Q. So your evidence is there was a power cut  
 21 in September 2014, a complete electrical failure to the  
 22 entire building, yes?  
 23 A. Yes.  
 24 Q. There was a transaction for a withdrawal from  
 25 a customer's Post Office card account for exactly £600?

109

1 A. Yes.  
 2 Q. At the end of the day you had a shortfall of exactly  
 3 £600?  
 4 A. Yes.  
 5 Q. And you rang the help desk and told them about the power  
 6 cut but they said there were no problems?  
 7 A. Correct.  
 8 Q. And your evidence remains that you investigated this at  
 9 the time and even tried to contact the customer, but  
 10 that she had passed away.  
 11 A. Yes.  
 12 Q. Presumably within a few days of coming into the branch?  
 13 A. Yes.  
 14 Q. And, again, whereas before you thought that the customer  
 15 had passed away in 2010/2011 --  
 16 A. Yes.  
 17 Q. -- he or she passed away four years later. Okay, well,  
 18 I'm going to come to the detail of that in a moment, but  
 19 just one small point before I carry on. One of your  
 20 complaints is that you had to look at -- and in fact it  
 21 is still on the screen, it's in paragraph 9 [E1/6/2].  
 22 You investigated this event and you complained that you  
 23 had to look at a very long report in order to see what  
 24 had happened. You say it was 15 to 18 feet long.  
 25 A. That's correct.

110

1 Q. A couple of points. First of all, you were as a matter  
 2 of fact you say able to work out what happened, weren't  
 3 you, from looking at this report?  
 4 A. No. Because then -- if I was able to look at what  
 5 happened then I might have an idea what happened to the  
 6 £600.  
 7 Q. We will come on to look at that. But you didn't have to  
 8 print that, did you, you could have looked at it on the  
 9 screen?  
 10 A. Yes, but the length of the report and the screen would  
 11 mean you would probably have to page down over 100  
 12 times.  
 13 Q. But you could have filtered it in various ways,  
 14 couldn't you?  
 15 A. I could have filtered it, yes.  
 16 Q. The point is that the impression that your evidence  
 17 gives is that you had to print out this comically long  
 18 document and go through it, but you didn't have to do  
 19 that, did you?  
 20 A. No.  
 21 Q. And you have now been reminded that you went onto the  
 22 forum to complain about this, so can we have a look at  
 23 the forum entries which prompted your memory. That's  
 24 {F/1257.6}. And just while that is being turned up,  
 25 I think you will agree -- I think perhaps you have

111

1 already agreed and apologies if I'm repeating myself,  
 2 but the point of going on to the forum is to try and get  
 3 assistance from other subpostmasters presumably?  
 4 A. Correct.  
 5 Q. And in order to do that I imagine you would generally  
 6 give them as much information as possible?  
 7 A. Yes.  
 8 MR GREEN: Do you mean point 1 at page 6?  
 9 MR HENDERSON: I do, yes. I'm very grateful to my learned  
 10 friend. It is 1257.1 at page 6 {F/1257.1/6}.  
 11 At the top quite helpfully in red we can see your  
 12 entries and this is what has prompted your memory about  
 13 the correct date, as I understand it?  
 14 A. I think so, yes.  
 15 Q. And you say:  
 16 "I too have had a recent unexplained loss of c.£600  
 17 on 16 September. Settled centrally on 17 September."  
 18 And so forth. You don't say anywhere on that that  
 19 there had been a power cut, do you?  
 20 A. No.  
 21 Q. And why is that?  
 22 A. I just omitted it.  
 23 Q. You just referred to an unexplained loss?  
 24 A. Yes.  
 25 Q. Now, again just to put this in context, if we go to --

112

1 we may have to flip backwards and forwards a little bit  
 2 so apologies, but the actual shortfall which the  
 3 Post Office write to you about is at 1262.1 {F/1262.1}  
 4 and that is actually in the amount of £660. Do you  
 5 recall that?  
 6 A. Yes.  
 7 Q. Not 600.  
 8 Now if I could ask the operator to go to {F/1257.4}  
 9 and if you could enable editing I think that makes it  
 10 easier to manipulate.  
 11 As far as the Post Office can tell there was no  
 12 power cut on that day, all right?  
 13 And if the operator could go -- if you go into the  
 14 top left -hand box that says A8, if you type in 11676 --  
 15 I think you may need to keep the "A" in to tell it that  
 16 it is the row. It is at the bottom of the page. Is it  
 17 possible to bring it up to the top and if you go to the  
 18 right, keeping the tab in that row, row 11676 -- can you  
 19 scroll right.  
 20 We can see in red there a transaction for £600, do  
 21 you see that?  
 22 A. Yes.  
 23 Q. And there's another transaction after it for another  
 24 £600?  
 25 A. Yes.

113

1 Q. Now, Post Office say that if there had been a power cut  
 2 at or around this time they would expect it to either  
 3 see no activity for a period of time --  
 4 A. Yes.  
 5 Q. -- or certain repeat events such as two sequential  
 6 log ons performed by the same user in a short period of  
 7 time, but no log off in-between. In other words, there  
 8 are certain indications of where there has been a power  
 9 outage. Do you see that?  
 10 A. Yes.  
 11 Q. And when we come on to look at one, the £195.04, we will  
 12 see those indications.  
 13 A. Okay.  
 14 Q. But we don't see those indications here. Do you accept  
 15 that?  
 16 A. I do.  
 17 Q. We could, for your Lordship's note, also -- I don't  
 18 suggest we necessarily need to go to it, but we can also  
 19 look at a slightly different spreadsheet which is the  
 20 events data spreadsheet at {F/1257.5} rows 4171 to 4457  
 21 and again one would expect to see evidence of outage  
 22 around row 4253. I'm just putting that in the  
 23 transcript, my Lord, I don't think we necessarily need  
 24 to go to it, it's the same point.  
 25 So there's no evidence from Post Office's point of

114

1 view of any outage, power cut at this point.  
 2 Could we have a look at your amended schedule of  
 3 information which is --  
 4 MR JUSTICE FRASER: Before you do that and you don't need to  
 5 take me there, but is there a document similar to that  
 6 that does show how a power outage would appear?  
 7 MR HENDERSON: Yes, my Lord, and we're coming to it.  
 8 MR JUSTICE FRASER: All right.  
 9 MR HENDERSON: Could you look at your amended schedule of  
 10 information, {F/1717.1}. Now, you will recall that this  
 11 is the document that each of the claimants, including  
 12 you, have had to fill in to give a summary of your  
 13 claim. Do you recall this?  
 14 A. Yes.  
 15 Q. And I think you have signed this, haven't you?  
 16 A. I think so.  
 17 Q. If we look at page 4 in section 2.4 {F/1717.1/4}, it is  
 18 the big paragraph in the middle, you say:  
 19 "When the branch incurred a shortfall, I didn't  
 20 always contact the Helpline as I did not trust the  
 21 advice which I received. Sometimes, after a few days,  
 22 the shortfall would resolve itself in any case but if it  
 23 didn't, I would try to resolve the issue myself by  
 24 contacting other post Office representatives. I recall  
 25 that on one occasion there was a shortfall of around

115

1 £600 which I knew could not be right. There had been  
 2 a power failure when we were processing the transaction  
 3 which, to my knowledge, did not complete."  
 4 Do you see that?  
 5 A. Yes.  
 6 Q. Just for completeness and to be clear, you don't refer,  
 7 for perfectly understandable reasons, in this schedule  
 8 of information to the £195.04 incident because you were  
 9 reminded of that by Ms van den Bogerd's evidence?  
 10 A. Yes.  
 11 Q. But if we look at page 5, the following page  
 12 {F/1717.1/5}, at section 3.1, at the very bottom you are  
 13 talking about apparent or alleged shortfalls and in the  
 14 bottom paragraph it says:  
 15 "I recall that there were also unexplained cash  
 16 shortfalls of ... [various numbers] in May 2008 and also  
 17 £660 in August 2014."  
 18 Do you see that?  
 19 A. Yes.  
 20 Q. Now, this is part of where I am confused, because your  
 21 evidence here is that there are two events. One is  
 22 a power cut on a date that you don't specify which led  
 23 to a loss of £600 which we saw on page 4, do you  
 24 remember?  
 25 A. Yes.

116

1 Q. And the other is a separate incident in August 2014 for  
 2 £660 but again no mention of a power cut. Can you  
 3 explain the anomaly?  
 4 A. The fact that I didn't mention the power cut?  
 5 Q. Well, you do mention a power cut -- I apologise -- if  
 6 I'm taking it too quickly, I apologise. Your evidence  
 7 now is that there was a power cut in September 2014  
 8 which led to a loss of £600.  
 9 A. Okay.  
 10 Q. Well, if you disagree say so?  
 11 A. No, I agree.  
 12 Q. Okay. And in this document you refer, as I understand  
 13 it, to two separate incidents. One is a power cut on  
 14 a date you don't specify, which led to a loss of £600,  
 15 and the other is the loss of £660 in August 2014 and I'm  
 16 just asking if you can explain what appears to be  
 17 a rather strange situation?  
 18 A. Just confusion, I would ... I was just confused.  
 19 Q. You are confused. So are we to take it that the £660  
 20 in August 2014 is caused by the power cut and there's  
 21 only one incident that you meant to refer to in this?  
 22 A. I couldn't say for sure. As I tried to explain earlier,  
 23 in drafting my original witness statement I went back to  
 24 my box file and it was filled with various bits of  
 25 paper, different sizes, different formats and with

117

1 handwritten scribbled notes on and that's where I tried  
 2 to piece together the information that I provided in  
 3 this.  
 4 Q. I'm not trying to trip you up here, Mr Tank, I'm just  
 5 trying to understand what your case is. Because you  
 6 appear to now be saying that there were two power cuts.  
 7 One was in December 2011 and it resulted in the loss you  
 8 say of £195.04 and you were reminded of it by  
 9 Ms van den Bogerd's statement. Yes? That was one power  
 10 cut?  
 11 A. Yes.  
 12 Q. And we will come on to that in a moment, but Post Office  
 13 agrees that that was a power cut.  
 14 A. I didn't -- no, it wasn't a power cut. The transaction  
 15 was unable to complete on the £195 because if you --  
 16 Q. Okay, well, we will come on to that --  
 17 A. I put the sequence of events, the fact that three  
 18 receipts printed out, so it was a lot more detailed, so  
 19 I'm not sure -- I don't think that was a power cut. I'm  
 20 not sure if it was a power cut.  
 21 Q. You're not sure one way or the other, okay.  
 22 A. I'm not sure if it was a power cut, but the transaction  
 23 was unable to complete.  
 24 Q. Right. What I'm trying to test with you is is it  
 25 possible that the evidence that you give in your first

118

1 witness statement about the power cut, power outage,  
 2 actually is evidence that is relevant to the £195.04  
 3 transaction rather than the £600 transaction?  
 4 A. It could well be, yes.  
 5 Q. Because my understanding -- well, never mind about my  
 6 understanding. Is it your suggestion that there have  
 7 been two incidents of outage, if I put it like that: one  
 8 for £195 and one for £600?  
 9 A. That I'm aware of, yes.  
 10 Q. Okay. Well, let's look at -- I'm still talking about  
 11 the £600 transaction at the moment.  
 12 MR JUSTICE FRASER: Did you use "outage" there meaning  
 13 a power cut, or did you use "outage" as a discrepancy?  
 14 MR HENDERSON: I mean a failure -- I mean Horizon going  
 15 offline for a moment, as opposed to a power cut to the  
 16 whole shop.  
 17 So let's look at the transaction. Now, first of  
 18 all, it wasn't you -- this is the £600.  
 19 A. Yes.  
 20 Q. It wasn't you who carried out this transaction, was it?  
 21 A. No, it was a member of staff.  
 22 Q. Louise I think?  
 23 A. Louise Boneham, yes.  
 24 Q. So all the evidence you give is based on what Louise  
 25 told you?

119

1 A. It is, as also with what I viewed over the CCTV.  
 2 Q. Okay. You don't mention anything about the CCTV in your  
 3 witness statement I don't think.  
 4 A. No.  
 5 Q. Why was that?  
 6 A. Because this -- after viewing the CCTV it wasn't  
 7 conclusive. We have seen Louise performing the  
 8 transactions on the computer system, receipts going one  
 9 way, the banking slip coming the other way, everything  
 10 looked in order. When I phoned to investigate the  
 11 incident they said from what they could see everything  
 12 looked fine: there was a cash withdrawal, there was  
 13 a cash deposit.  
 14 Q. Well, let's have a look at what might have happened.  
 15 First of all, the relevant transaction for £600 was from  
 16 a Post Office card account, wasn't it?  
 17 A. Correct.  
 18 Q. And as I understand it that's quite a basic bank account  
 19 offered by the Post Office?  
 20 A. Sort of. The card account is a vehicle for people to  
 21 receive benefits payments from the Government. The  
 22 daily cash withdrawal limit on a Post Office card  
 23 account is £600.  
 24 Q. Right and it only offers basic withdrawal services,  
 25 doesn't it, from a post office counter or

120

1 a Bank of Ireland ATM?  
 2 A. Yes.  
 3 Q. So Post Office card account customers are not able for  
 4 example to deposit money into their account?  
 5 A. No.  
 6 Q. To use a debit card facility , or to transfer funds from  
 7 a Post Office card account to another bank institution?  
 8 A. Yes.  
 9 Q. You agree?  
 10 A. I do.  
 11 Q. Thank you. So if a Post Office card account customer  
 12 needs to transfer money from the POCA account to one of  
 13 the Post Office 's partner banks, they will typically  
 14 within the same customer session undertake the following  
 15 transactions: they will complete a cash withdrawal from  
 16 POCA and they will deposit the withdrawn money directly  
 17 into the other account --  
 18 A. Yes.  
 19 Q. -- by means perhaps of a debit or deposit card issued by  
 20 that bank?  
 21 A. Yes.  
 22 Q. There wasn't any other way to do it?  
 23 A. Well, in this instance it was a little paper paying in  
 24 slip , so we take the paper paying in slip off the  
 25 customer, input the sort code and account number and

121

1 then deposit the cash.  
 2 Q. Fine. Let's go back to the ARQ data at 1257.4  
 3 {F/1257.4}.  
 4 Could we go -- again I'm afraid we will have to  
 5 enable editing I think, if we go back to the row  
 6 I looked at before. Could we go back to -- again if you  
 7 keep the "A" in and you just put 11676. And again if  
 8 I could trouble you to the bring it to the top of the  
 9 screen I just think it's a bit easier to see. Thank  
 10 you. And again if you could go right.  
 11 MR JUSTICE FRASER: Can we just go left a couple of columns.  
 12 MR HENDERSON: Yes. Stop there, that's perfect.  
 13 So what we see here is the red figure is the  
 14 withdrawal of £600 from the Post Office card account,  
 15 yes?  
 16 A. Yes.  
 17 Q. And then below it, immediately, there is a cash deposit  
 18 into a Lloyds Bank?  
 19 A. Yes.  
 20 Q. Now, it's possible, isn't it, that what actually  
 21 happened is that the cash was accidentally handed over to  
 22 the customer and also registered as being deposited with  
 23 Lloyds Bank?  
 24 A. It's possible, but, as I have mentioned, I checked the  
 25 CCTV and we could see what was going backwards and

122

1 forwards across the counter and it was receipts going to  
 2 the customer and a paying in slip coming from the  
 3 customer.  
 4 Q. Well, Mr Tank, you haven't referred to any CCTV in your  
 5 witness evidence.  
 6 A. I understand.  
 7 Q. Which I accept you thought was only provisional but we  
 8 take a bit more seriously.  
 9 A. Okay.  
 10 Q. And as far as I'm aware, you haven't given disclosure of  
 11 any CCTV, have you?  
 12 A. No.  
 13 Q. Okay.  
 14 (Pause).  
 15 Based on the evidence here, you can't say that what  
 16 I have suggested to you, which is that an error was  
 17 made, a simple user error was made, you can't say that  
 18 didn't occur, can you?  
 19 A. I can say that. I can say that there is no cash that  
 20 went over the till .  
 21 Q. Based on what you tell us you saw on the CCTV?  
 22 A. Correct, yes. Obviously I can't evidence that, but ...  
 23 Q. I'm just wondering how you can be so confident about  
 24 what happened, about this particular transaction when  
 25 you couldn't even get the year right to the tune of four

123

1 years?  
 2 A. I investigated the loss to the best of my ability .  
 3 I turned to the Post Office for help. What they told me  
 4 on the telephone was everything looked fine , they could  
 5 see the transaction , they could see the £600 going out,  
 6 they could see the £600 going in .  
 7 Q. Exactly .  
 8 A. So that 's why it is an unexplained loss , because I can't  
 9 explain it .  
 10 Q. Well, I understand that it is a frustrating loss , but  
 11 there's a perfectly simple explanation for it which is  
 12 an understandable user error?  
 13 A. I agree .  
 14 Q. And you nevertheless come into court and say on oath  
 15 that you are so confident that you did nothing wrong,  
 16 that that didn't happen, because of evidence you have  
 17 seen and we haven't .  
 18 A. Okay. Fair point .  
 19 Q. In a situation where you couldn't, until reminded by  
 20 Post Office , recall the date of the transaction to the  
 21 tune of four years?  
 22 A. But you have to bear in mind I paid that £600 back .  
 23 I beared that loss . I never thought that I would  
 24 actually get it back . My relationship with Post Office  
 25 ended a couple of years ago, so that money was written

124



1 off. I wrote that money off myself. I paid that back.  
 2 Q. I understand that. But if it was, as I'm suggesting to  
 3 you, or if it's possible that it was a user error then  
 4 you would have to pay it back, wouldn't you?  
 5 A. Yes.  
 6 Q. Now, let's turn then to the shortfall which you did  
 7 report on 13 December 2011 for £195.04 and just to  
 8 recap, this is not one you mentioned in your first  
 9 witness statement but you read Ms van den Bogerd's  
 10 statement and she, just to remind you, said "I can't see  
 11 anything that suggests there was a problem for £600 in  
 12 2010/2011, but it does make sense in a relation to  
 13 a transaction for £195.04".  
 14 A. Yes.  
 15 Q. And you tell us in your second witness statement -- and  
 16 we can go to it if necessary but I think you have  
 17 already agreed -- that before you saw  
 18 Ms van den Bogerd's evidence you had no real  
 19 recollection of this event at all?  
 20 A. No.  
 21 Q. So everything that you are basing it on now is really  
 22 based on the forum, is it?  
 23 A. It is, yes.  
 24 Q. Now, this is an example of you, quite understandably,  
 25 contacting the helpline about a shortfall of less than

125

1 £200?  
 2 A. Yes.  
 3 Q. And presumably you would routinely report any  
 4 discrepancy at that sort of level?  
 5 A. No.  
 6 Q. Not necessarily?  
 7 A. No.  
 8 Q. Why not?  
 9 A. I wouldn't say routinely, no.  
 10 Q. Okay, let me put the question more precisely, it is my  
 11 fault. If you felt that there was an unexplained  
 12 shortfall --  
 13 A. Yes.  
 14 Q. -- for something like £200, I'm suggesting it would be  
 15 perfectly understandable and that in the natural course  
 16 of things you would contact Post Office?  
 17 A. Okay, so if I can just explain about the £195.04.  
 18 Obviously I was reminded about that from --  
 19 Q. Yes.  
 20 A. -- looking at the forum posts, which is in red on the  
 21 screen --  
 22 Q. Yes, we will come to it.  
 23 A. £195 withdrawal and I state, you know, what happens, the  
 24 screen says "Cash to customer, balance due zero".  
 25 I subsequently then go on to report that I tried to find

126

1 that transaction the following day and there was no  
 2 record of it. On whatever I could access on my  
 3 terminal, I could not find the £195.04. After phoning  
 4 the helpline, they were able to find that transaction.  
 5 I think they use a system called Credence which we don't  
 6 have access to.  
 7 Q. I will come on to all that. I'm just exploring at the  
 8 moment what your practice was about reporting an  
 9 unexplained shortfall and I'm suggesting that when you  
 10 have got an unexplained shortfall of £200, quite  
 11 understandably you have contacted the helpline.  
 12 A. Mm-hm.  
 13 Q. And I'm asking you whether that would be your usual  
 14 practice, if you had an unexplained discrepancy? You  
 15 might have an explained discrepancy, you might know that  
 16 something went wrong, you remember "Oh, I messed  
 17 something up" or "I know what that's about", but if it  
 18 is an unexplained discrepancy I'm suggesting that at  
 19 that sort of level you would generally report it,  
 20 I imagine?  
 21 A. I think it's the other way round. If it was an  
 22 explained then I would report it. If it's unexplained  
 23 then I'm less likely to report it because it could be  
 24 down to human error.  
 25 Q. All right, let me put it in a different way then. If

127

1 you felt it called for some further explanation then you  
 2 would contact the helpline?  
 3 A. Yes.  
 4 Q. And certainly if it was more than a few pounds you would  
 5 do that?  
 6 A. Yes.  
 7 Q. Okay. So let's have a look again at the forum comments  
 8 which are {F/1257.1}. This is 13 December 2011:  
 9 "Some advice/help required.  
 10 "Yesterday during HOL failure ..."  
 11 Horizon Online, HOL?  
 12 A. Yes.  
 13 Q. "... was in process of POCA card withdrawal.  
 14 Transaction seemed to go through okay apart from Horizon  
 15 printing 3 identical receipts.  
 16 "Receipts showed a disconnected session with  
 17 recovery code. Receipts also showed."  
 18 And you go through total due to customer, blah,  
 19 blah, blah:  
 20 "Because receipts showed cash due to customer. we  
 21 paid out.  
 22 "Come evening balancing till showed approx £200.00  
 23 loss. Thought at time must be mis-count and will try to  
 24 sort in morn.  
 25 "This morning produced transaction log for the

128

1 period of HOL FAILURE. No record of 195.04 transaction  
 2 at all !!!!  
 3 "Phoned help-line and was told by very irate member  
 4 of staff that loss is mine unless I can sort out with  
 5 customer directly ..."  
 6 And so forth. Then at the bottom of the page:  
 7 "What should be my next course of action???"  
 8 "Speak to press (is there anything in contract  
 9 preventing me doing this?"  
 10 Then if we can go down the page:  
 11 "Speak to CWU (not member of POLFED anymore)?  
 12 "Speak to Shoemiths?  
 13 "Try taking POL to small claims court?  
 14 "Any useful suggestions appreciated."  
 15 So you were pretty cross about this by the look of  
 16 things?  
 17 A. Yes. In the one hand I have receipts produced by  
 18 Horizon and then the following day when I go to look for  
 19 that transaction there was no record of it. It was  
 20 very, very frustrating.  
 21 Q. I understand.  
 22 MR JUSTICE FRASER: Can we go back to the previous page  
 23 please {F/1257.1}.  
 24 MR HENDERSON: So what appears to have happened was  
 25 a transaction from Post Office card account was in the

129

1 middle of being processed and so it was in the stack  
 2 presumably.  
 3 A. Yes.  
 4 Q. But had not yet been posted to Horizon. So you hadn't  
 5 cashed out on that transaction, you hadn't completed  
 6 everything to do with that transaction?  
 7 A. On the stack --  
 8 Q. It's on the stack.  
 9 A. It's on the stack, but the stack has a balance of zero,  
 10 so to clear the stack you just press "enter" and it goes  
 11 straight --  
 12 Q. But you hadn't got to the point of clearing the stack?  
 13 A. I'm not sure.  
 14 Q. Okay. My suggestion is that there was probably an  
 15 outage at just the point where the money had been taken  
 16 from Post Office card account but had not been processed  
 17 onto Horizon. That's my suggestion to you.  
 18 A. Okay.  
 19 MR JUSTICE FRASER: Well, is the witness going to be in  
 20 a position to agree or disagree?  
 21 MR HENDERSON: Well, he might be if he recalled.  
 22 MR JUSTICE FRASER: Do you recall that happening when there  
 23 were outages?  
 24 A. No. I cannot recall.  
 25 MR JUSTICE FRASER: Were you aware of when outages would

130

1 occur like that?  
 2 A. Not all the time.  
 3 MR JUSTICE FRASER: Do you want to put the question again?  
 4 MR HENDERSON: Yes. What I'm suggesting is that the cause  
 5 of this problem was that an outage occurred at  
 6 a particular point in time.  
 7 A. Yes.  
 8 Q. You were in the process of effecting a transaction from  
 9 POCA?  
 10 A. Yes.  
 11 Q. It was in the stack and it had cleared from POCA?  
 12 A. Actually you mentioned the word "outage". I'm not --  
 13 was there a power outage?  
 14 Q. I'm not sure if it was a power outage, but I think it  
 15 may have been a problem with the system.  
 16 A. Ah, okay.  
 17 Q. The system went down in some way.  
 18 A. So -- yes, because you said that if there's a power  
 19 outage then there's evidence when you have to log back  
 20 in, so did that happen on this occasion?  
 21 Q. Okay, I want to come to all this and I'm doing this  
 22 clumsily. What I'm suggesting is that what may have  
 23 happened -- and if you don't recall, you don't recall,  
 24 but what may have happened is that the transaction was  
 25 in the stack, the money had been taken from the

131

1 Post Office card account and before you cleared the  
 2 stack there was an outage.  
 3 A. Possibly.  
 4 Q. Okay.  
 5 Let's look at the events data at {F/869.1}. And if  
 6 we enable editing.  
 7 That is not the document I was expecting. 871.1.  
 8 {F/871.1}. No, I don't want that.  
 9 MR JUSTICE FRASER: What are we looking for, the event data?  
 10 MR HENDERSON: We are looking at the event data.  
 11 MR JUSTICE FRASER: Is it 1257.5? That's just a partly  
 12 educated guess based on ...  
 13 MR GREEN: I think it is F/869.1 but you have to click on  
 14 the sheet tab. You were in the summary tab.  
 15 MR HENDERSON: Right, I couldn't see that. Thank you very  
 16 much.  
 17 MR JUSTICE FRASER: It doesn't show up on the common screen,  
 18 the tabs at the bottom, you can't see them on the common  
 19 screen.  
 20 MR HENDERSON: I'm so sorry, back to {F/869.1}. And there  
 21 is I think --  
 22 MR JUSTICE FRASER: I think you have to click on the tab  
 23 before you go full screen, so if you go into half screen  
 24 you will be able to see the tabs at the bottom. At the  
 25 bottom you will see "Sheet 1", click on "Sheet 1" and

132

1 now expand it.  
 2 MR HENDERSON: Thank you very much.  
 3 MR JUSTICE FRASER: Is that what we are after?  
 4 MR HENDERSON: That is what we are after I believe.  
 5 If you go to the top and type A327, what we see here  
 6 is that you are logged on at 13.39. Do you see that at  
 7 the top there?  
 8 A. (Nods).  
 9 Q. Do you see that?  
 10 A. Yes.  
 11 Q. Okay and then there's a message at 13.40 to say  
 12 "Session ... could not recover".  
 13 A. Yes.  
 14 Q. And then there's a gap of 22 minutes and there's  
 15 a session receipt at 14.02. Do you see that?  
 16 A. Yes.  
 17 MR HENDERSON: Now, my Lord, in answer to your Lordship's  
 18 earlier question, that is what Post Office would expect  
 19 to see when there is an outage.  
 20 So then the Horizon system comes back online and at  
 21 that point there will be a recovery process, won't  
 22 there, various screens that you need to go through?  
 23 A. Yes.  
 24 Q. Okay. And if we could have a look at  
 25 Ms van den Bogerd's statement at {E2/5/16}, if you look

1 at paragraph 53 and just read that to yourself.  
 2 (Pause).  
 3 Have you read that?  
 4 A. I'm just getting to the bottom of it.  
 5 Q. Sorry.  
 6 (Pause).  
 7 A. Okay.  
 8 Q. Do you agree that that's a fair summary, an accurate  
 9 summary?  
 10 A. Yes.  
 11 Q. Okay, thank you.  
 12 When power is restored there is a procedure to be  
 13 followed, isn't there?  
 14 A. Yes.  
 15 Q. And that procedure will result either in a transaction  
 16 being cancelled, or recovered?  
 17 A. Yes.  
 18 Q. Okay. Let's have a look at the Horizon Online quick  
 19 reference guide at {F/1365}. You will see at the top  
 20 there:  
 21 "Disconnections and screen freezes on Horizon Online  
 22 are dealt with differently to Horizon. If either occurs  
 23 during a customer session Recovery actions may be  
 24 required.  
 25 "You need to make sure you do the right thing at the

1 time the counter becomes unavailable."  
 2 If you drop the next session section and it says  
 3 "Disconnected session receipt", do you see that?  
 4 A. Yes.  
 5 Q. "The system will then settle the session automatically  
 6 and print 3 copies of a disconnected session receipt  
 7 before automatically logging you out.  
 8 "The copies of the receipt are, 1 for the customer,  
 9 1 to be kept with your stock unit, 1 to be kept at the  
 10 failed terminal."  
 11 Okay?  
 12 A. Okay.  
 13 Q. And then below it says, again missing out the next  
 14 section:  
 15 "The system treats transactions as  
 16 either: recoverable ... or cancelable ..."  
 17 This is a recoverable one, isn't it, because it is  
 18 a card transaction?  
 19 A. Okay.  
 20 Q. We see that from below. Do you see  
 21 "recoverable/cancelable products" including debit/credit  
 22 card payments, et cetera?  
 23 A. Yes.  
 24 Q. And then at the end of that:  
 25 "These will be recorded on the disconnected session

1 receipt as completed and must be settled with the  
 2 customer."  
 3 Okay?  
 4 A. Okay.  
 5 Q. Then if you look on to the next page {F/1365/2} there's  
 6 a flowchart which takes you through that process.  
 7 A. Yes.  
 8 MR JUSTICE FRASER: I think that flowchart is what you do  
 9 higher up the page on the first page, isn't it?  
 10 MR HENDERSON: Yes, I think that probably is right.  
 11 MR JUSTICE FRASER: Well, let's go back to the page before  
 12 {F/1365/1} just to make sure I follow what charts go  
 13 with which. Is that's what referred to as page 2 of the  
 14 document under "Disconnected session receipt"?  
 15 MR HENDERSON: Yes, I believe so.  
 16 MR JUSTICE FRASER: So:  
 17 "... a disconnected session receipt will not be  
 18 produced if the system freezes or there is a hardware  
 19 failure. Page 2 of this document describes what you  
 20 should do in this scenario."  
 21 And the flowchart is on page 2. Is that right?  
 22 MR HENDERSON: I think that must be right, my Lord, but what  
 23 Mr Tank says here is he was provided with three  
 24 receipts.  
 25 MR JUSTICE FRASER: Yes.

1 MR HENDERSON: Then if we go to page 3 of this same document  
 2 {F/1365/3}, this is "When online connectivity is  
 3 restored". Do you have that, Mr Tank?  
 4 A. I do.  
 5 Q. "Page 4 of this document provides a simple diagram that  
 6 explains the actions you should take when Horizon Online  
 7 connectivity is restored the system will carry out  
 8 Recovery for customer sessions that were in progress at  
 9 the time of failure. When you next login to the  
 10 terminal where the failure occurred, the system will  
 11 recognise that the last session did not complete  
 12 properly and will automatically commence Recovery. You  
 13 will see the following message ..."  
 14 Then "Recovery receipt":  
 15 "You should follow all on-screen instructions. Once  
 16 the Recovery process has completed, a Recovery receipt  
 17 will be printed automatically."  
 18 MR JUSTICE FRASER: I think we are on a different page to  
 19 you.  
 20 MR HENDERSON: I'm so sorry. Page 3. I just hadn't noticed  
 21 the screen. Right, I have just read out the top section  
 22 and I'm looking now at the "Recovery receipt" section.  
 23 Do you see that, Mr Tank?  
 24 A. I do.  
 25 Q. "You should follow all on-screen instructions. Once the

137

1 Recovery process has completed, a Recovery receipt will  
 2 be printed automatically.  
 3 "The Recovery Receipt should be attached to the  
 4 Disconnected Session receipt stored at the failed  
 5 terminal."  
 6 Do you see that?  
 7 A. I do.  
 8 Q. So what this procedure tells you is that if you follow  
 9 the Horizon procedures properly you get three receipts  
 10 for the disconnected session and a recovery receipt,  
 11 do you agree?  
 12 A. I agree, but I don't actually remember having this  
 13 document in my office.  
 14 Q. This is online I think.  
 15 A. Oh, this is online?  
 16 Q. I thought it was online but I might be wrong.  
 17 A. It is quick reference guide, it states it is version 5.  
 18 The only version I remember having was just a single  
 19 piece of A4 -- a double-sided A4 piece of paper. This  
 20 suggests that there were four -- two pages. Because you  
 21 are on page 3 at the moment. I never had -- I never  
 22 had ...  
 23 Q. All right. I don't know what you had, candidly, at the  
 24 moment.  
 25 MR JUSTICE FRASER: We did have some evidence on this in the

138

1 common issues trial and a document was produced that was  
 2 a single A4 sheet, but it did look different to this.  
 3 It had red on rather than blue.  
 4 MR HENDERSON: Right. The point is, however, that this  
 5 document that I have taken you to sets out the procedure  
 6 that needed to be followed. Do you accept that?  
 7 A. That document does, yes.  
 8 Q. Okay.  
 9 A. I never had that document, so I could never refer to it.  
 10 Q. But you would have been taken through the screens that  
 11 came up on Horizon?  
 12 A. Yes.  
 13 Q. Okay. Your evidence -- I think your evidence is that  
 14 you gave -- I should have asked this before and  
 15 I apologise. Was it you doing this transaction, was it  
 16 Louise or another assistant, or do you not recall?  
 17 A. I can't recall.  
 18 Q. Okay, that's fair.  
 19 Your evidence at {E1/6/2}, in paragraph 7, the  
 20 penultimate sentence, is:  
 21 "A series of receipts were printed which she then  
 22 gave to the customer."  
 23 Now, the reason I'm pointing to this, Mr Tank, is  
 24 this is the evidence you give in relation to the £600.  
 25 A. Yes.

139

1 Q. But I have suggested to you already, and I think you  
 2 have accepted, that it's possible that this evidence in  
 3 fact relates to events in 2010/2011 in relation to the  
 4 £195.04?  
 5 A. Yes.  
 6 Q. And it seems that what was done was all of the receipts  
 7 were given to the customer?  
 8 A. Yes.  
 9 Q. Which is not the proper procedure?  
 10 A. Which is not the proper procedure, no.  
 11 Q. So do you accept that the proper procedure wasn't  
 12 followed?  
 13 A. Yes.  
 14 Q. And then you call the help desk and we see that in  
 15 {F/1286.1}. If we enable editing and actually you can  
 16 scroll down to row 120 I hope. Can we go across, keep  
 17 going across ... I think this is the wrong ... no, I'm  
 18 sorry, I have given you the wrong reference. It is the  
 19 call log -- this is 1286.1, is it?  
 20 MR GREEN: You might be looking for the "Remedy" tab.  
 21 MR HENDERSON: I do want the "Remedy" tab and I hadn't  
 22 spotted that it hadn't -- I'm so sorry, at the bottom  
 23 there the "Remedy" tab, thank you.  
 24 If you then go to -- if you just go into the top  
 25 left hand and if you delete the 1 and put 120, or you

140

1 can scroll down, whichever is easier. Then if we go to  
 2 row 120 and if you just stop there.  
 3 This is the call made from your branch, Mr Tank,  
 4 yes?  
 5 A. Yes, the following day.  
 6 Q. And it is column I:  
 7 "Called this morning about a Horizon failure  
 8 yesterday, branch completed a withdrawal and the 195.04  
 9 failed recovery receipt ..."  
 10 And so forth and so on. And that resulted in a PEAK  
 11 being raised, which you wouldn't have known about at the  
 12 time, I accept.  
 13 A. No.  
 14 Q. But let's have a look at it {F/870}. And if you go to  
 15 page 2 of that document {F/870/2} in the first yellow  
 16 section there -- do you see that? It says date  
 17 14 December 2011, do you see that?  
 18 A. Yes.  
 19 Q. "Summary", it says:  
 20 "The banking transaction had completed ... including  
 21 the receipt print ... and money should have changed  
 22 hands.  
 23 "The basket settlement failed from 13.35 with 'no  
 24 response received from data centre' and then two retries  
 25 also failed and the attempt cancelled ..."

141

1 "The Disconnected Session receipts show 'Cash TO  
 2 CUSTOMER 195.04' so the customer's account should be  
 3 correct but the branch will have a shortage (for a  
 4 withdrawal) because the session hasn't been recorded."  
 5 And that's just explaining what had happened.  
 6 A. Yes.  
 7 Q. And then if we go to {F/871.1}, the transaction  
 8 correction is raised.  
 9 A. Yes.  
 10 Q. So you were refunded this amount of money?  
 11 A. I was.  
 12 Q. That's not something you mentioned in your witness  
 13 statement, is it?  
 14 A. No.  
 15 Q. Why is that?  
 16 A. Because I was referring to the incident in terms of  
 17 something that I had no control over that caused a loss  
 18 to my office.  
 19 Q. But it didn't --  
 20 A. The fact that -- it caused a loss. The fact that that  
 21 loss was resolved afterwards was not the issue. The  
 22 fact that it caused a loss and I had no explanation for  
 23 it, that's what I was reporting, that's what my witness  
 24 statement was for.  
 25 Q. Okay. But having now seen everything that's happened

142

1 and looked at the procedure that should have been  
 2 followed, do you still maintain that this event shows  
 3 that there's something wrong with Horizon?  
 4 A. Yes.  
 5 Q. It is Horizon working as it is supposed to, isn't it?  
 6 Something has gone wrong and a procedure has been  
 7 followed --  
 8 A. Mm-hm.  
 9 Q. -- from the user point of view not quite correctly  
 10 because you should have kept some of the receipts, but  
 11 nevertheless you have raised it, it has been  
 12 investigated and the money has been refunded?  
 13 A. Yes.  
 14 Q. How is that a fault with Horizon?  
 15 A. Because the error shouldn't have happened in the first  
 16 place. If -- it seems like -- with the relationship  
 17 between postmasters and the Post Office, it's very much  
 18 one-sided and we as subpostmasters bear all the risk.  
 19 Q. But that's not true for this transaction, is it? You  
 20 failed to follow the proper procedure --  
 21 A. Okay.  
 22 Q. -- maybe for understandable reasons, I don't know.  
 23 A. Okay.  
 24 Q. You raised a query and a few days later you were  
 25 refunded the money. I don't see what the complaint is?

143

1 A. If I didn't call in to report, would I still have got  
 2 the refund?  
 3 Q. I think you would have actually, yes.  
 4 A. I wasn't to know. I didn't know there was a PEAK --  
 5 Q. But I'm not sure, I don't have the -- okay --  
 6 A. I don't know either.  
 7 Q. -- we will explore that later this week.  
 8 MR JUSTICE FRASER: Can you not overspeak one another.  
 9 MR HENDERSON: Apologies.  
 10 MR JUSTICE FRASER: Mr Henderson, do you just want to repeat  
 11 what you --  
 12 MR HENDERSON: I think I completed what I --  
 13 MR JUSTICE FRASER: Well I didn't get the answer because you  
 14 then started speaking.  
 15 You were asked, Mr Tank, "You raised a query, you  
 16 were refunded the money" and Mr Henderson said he didn't  
 17 see what the complaint is and what was your answer to  
 18 that please?  
 19 A. On the day of the transaction my office showed a loss of  
 20 nearly £200. I -- the following day I went to  
 21 investigate that loss, I couldn't find any record of it  
 22 on my terminal and then that's when I phoned through to  
 23 the helpline and reported.  
 24 MR HENDERSON: Okay, but the way --  
 25 A. What was going on in the background in terms of the PEAK

144

1 review or whatever, or -- I don't know if that was  
2 automated, or if my call to the network business support  
3 centre instigated the refund.  
4 Q. The point is that the way Horizon works, it either  
5 records the transaction as having been completed  
6 properly --  
7 A. Yes.  
8 Q. -- or it generates the evidence to demonstrate that  
9 there has been a problem?  
10 A. Yes.  
11 Q. Identifying that particular transaction.  
12 A. Yes.  
13 Q. I want to ask you a few questions about the third area  
14 you deal with, very brief questions, on label  
15 transaction issues.  
16 A. Yes.  
17 Q. Now, you say you experienced some problems with printing  
18 labels --  
19 A. Yes.  
20 Q. -- where you say no label could be printed even though  
21 you were charged for it.  
22 A. Yes.  
23 Q. And again we've got a timing issue here because in your  
24 first witness statement you said that that happened in  
25 2007.

1 A. Yes.  
2 Q. And Ms van den Bogerd says she could find no evidence of  
3 that at all.  
4 A. Okay.  
5 Q. And now you say in your second witness statement that  
6 you think it was 2011.  
7 A. Yes.  
8 Q. And again can you help with how that error came to be  
9 made?  
10 A. Again, my initial witness statement I was just relying  
11 on my memory and my supplemental witness statement is  
12 when I was able to research it a bit more.  
13 Q. And what was the evidence that you got for your second  
14 witness statement that helped you on this date, because  
15 I'm not sure that I'm aware of any?  
16 A. Again, it was Horizon generated receipts, print-outs,  
17 with hand-written dates and reference numbers on them.  
18 Q. Sorry, where are these documents?  
19 A. With my solicitors.  
20 Q. Oh. I don't think they have made their way over, but  
21 I might be wrong.  
22 Now, there are again processes on Horizon which  
23 cover this type of eventuality, aren't there?  
24 A. No.  
25 Q. Well, Horizon allows you to record a label as rejected,

1 doesn't it?  
2 A. It does, yes. Usually, usually, but in this particular  
3 scenario it didn't give you that option.  
4 Q. But normally it would prompt you to specify whether or  
5 not the label has been printed correctly, wouldn't it?  
6 A. Yes, this is my point: during this particular issue,  
7 Horizon doesn't perform as it should.  
8 Q. And it is also possible, isn't it, to process  
9 a completely separate transaction for spoiled postage  
10 labels and printing a replacement? Have a look at  
11 {F/1848.6}. This just summarises the procedure that's  
12 in place.  
13 A. "A label can only be spoiled, if the label is on hand."  
14 Q. Ms van den Bogerd's evidence at paragraph 82 of her  
15 witness statement at {E2/5/21} says this process is  
16 available even if the printer had not produced a label  
17 at all. Do you accept that?  
18 A. No, because the previous page showed that you had to  
19 have a label on hand.  
20 Q. So she is wrong about that?  
21 A. Yes. Well, it is contradictory, isn't it?  
22 Q. Well, I accept that that's what that document says, but  
23 the evidence from Post Office is that in fact you could  
24 do that even if the printer had not produced a label at  
25 all?

1 A. I could do that, but then it would be contrary to the  
2 other instructions.  
3 Q. If you could do it -- my point is a simple one, Mr Tank.  
4 There were procedures built into Horizon to cater for  
5 the situation that you explained -- I have to say in the  
6 vaguest of terms, but as I understand what you are  
7 saying, there were procedures in place which ensured you  
8 could deal with the situation, weren't there?  
9 A. No.  
10 Q. We will have to differ.  
11 Finally, you were investigated for various matters  
12 in 2015, weren't you?  
13 A. Not investigated.  
14 Q. You were interviewed on 5 November 2015, do you recall?  
15 A. I had a performance interview, yes.  
16 Q. And this resulted in a letter from Post Office to you of  
17 15 February 2016. We see that at {F/1431.1}.  
18 MR JUSTICE FRASER: Just let me read this quickly.  
19 (Pause).  
20 Actually I will do it on my screen, give me  
21 a second.  
22 MR HENDERSON: If you go to --  
23 MR JUSTICE FRASER: Just give me a second, Mr Henderson.  
24 There is a reason. I will explain at the end. Let me  
25 just quickly read it.

1 (Pause).  
 2 Is this a Civil Evidence Act situation? I will tell  
 3 you what, just pause there.  
 4 Mr Tank, I'm just going to ask you just to pop out  
 5 of court for literally two minutes. There is just  
 6 something I need to ask counsel.  
 7 A. Okay.  
 8 (In the absence of the witness)  
 9 MR JUSTICE FRASER: I just ask out of caution. In the  
 10 common issues trial there were two claimant witnesses  
 11 who had to be given the warning against  
 12 self-incrimination under the Act because of potential  
 13 criminal offences. It was obviously a situation that  
 14 was at the forefront of everyone's mind because of the  
 15 nature of that trial, so before those questions were put  
 16 I knew in advance whether I had to give that warning or  
 17 not.  
 18 MR HENDERSON: I understand, my Lord.  
 19 MR JUSTICE FRASER: Is this one of those situations?  
 20 MR HENDERSON: I think it probably would be sensible to do  
 21 so.  
 22 MR JUSTICE FRASER: It does seem to me based on the four  
 23 items listed that the witness is entitled to it.  
 24 MR HENDERSON: I think that's probably right.  
 25 MR JUSTICE FRASER: Any observations, Mr Green?

149

1 MR GREEN: My Lord, no, I think it should be given.  
 2 MR JUSTICE FRASER: Let's have Mr Tank back in. I did have  
 3 the form of words with me last time. I don't have it  
 4 now but I'm pretty confident that I can do it  
 5 effectively; if either of you think I haven't, correct  
 6 me.  
 7 (In the presence of the witness).  
 8 Thank you very much, Mr Tank. Just have a seat.  
 9 Just before Mr Henderson asks you some questions, there  
 10 is just a formal warning I have to give you in relation  
 11 to the right you have not to answer any questions if you  
 12 think answering them may incriminate you in respect of  
 13 future criminal proceedings.  
 14 It is a statutory warning. It was given in two  
 15 other cases that you don't have to be concerned with in  
 16 the previous trial and it is something standard but  
 17 I have to draw it to your attention. So depending on  
 18 what questions Mr Henderson is asking you, what the  
 19 subject matter of them is, you are entitled to say that  
 20 you don't wish to answer the question.  
 21 A. Sure.  
 22 MR JUSTICE FRASER: Is that sufficient?  
 23 MR HENDERSON: I'm grateful.  
 24 If we go to the second page of that letter  
 25 {F/1431.1/2}, do you recall that at that meeting you had

150

1 a discussion which is referred to here in the second  
 2 paragraph:  
 3 "We also discussed the inappropriate official  
 4 postage claims conducted at the branch. During the  
 5 period 25 August 2015 and 15 September 2015 nine claims  
 6 of £100 official postage were undertaken totalling £900.  
 7 These claims were subsequently reversed on  
 8 23 September 2015. A further claim of £500 was made on  
 9 2 October 2015 and subsequently reversed on  
 10 27 October 2015.  
 11 "As discussed the use of official postage in this  
 12 manner is contrary to the instructions contained within  
 13 Horizon Online. The 'stamps for official use' icon on  
 14 Horizon Online must only be used for postage costs that  
 15 are incurred when undertaking official Post Office  
 16 Limited business and where no official pre-paid envelope  
 17 is available. For full instructions please see Horizon  
 18 help back office ..."  
 19 And so forth. Do you see that?  
 20 A. Yes.  
 21 Q. Do you recall this incident or this --  
 22 A. The meeting?  
 23 Q. The meeting and what was said?  
 24 A. Yes.  
 25 Q. And official postage is a function on Horizon that

151

1 should only, as we have just seen, be used for postage  
 2 costs incurred when undertaking official Post Office  
 3 business, that's right, isn't it?  
 4 A. Yes.  
 5 Q. And you have always known that presumably?  
 6 A. Yes.  
 7 Q. And essentially, as I understand your position, you  
 8 considered that you were experiencing certain issues  
 9 which were causing you loss --  
 10 A. Yes.  
 11 Q. -- and you decided to take matters into your own things  
 12 and to take official postage, is that right?  
 13 A. No, it was just my way of formally recording my dispute.  
 14 Communication channels with the Post Office weren't  
 15 particularly good. Every time I tried to air any  
 16 grievances, I never really found I got anywhere, so this  
 17 was my way of complaining.  
 18 Q. To help yourself to some official postage?  
 19 A. I wasn't helping myself. I wasn't helping myself. No  
 20 money actually left the office. Official postage is --  
 21 it's a computer function and all it does is allocate  
 22 that money under that particular ... so there's no --  
 23 I'm not helping myself at all.  
 24 Q. Well, if there was another shortage in Horizon, for  
 25 example, that would make up for it, wouldn't it? I mean

152

1 one way or the other -- one way or another, by claiming  
 2 official postage you're doing something you shouldn't do  
 3 which improved your financial position?  
 4 A. No.  
 5 Q. How not, Mr Tank?  
 6 A. Improved my financial position?  
 7 Q. Yes?  
 8 A. How would it improve my financial position? We're  
 9 talking about -- it's just a ledger entry.  
 10 Q. Just a ledger entry?  
 11 A. Yes.  
 12 Q. Let's have a look at the transcript of your interview at  
 13 {F/1399.1}.  
 14 MR JUSTICE FRASER: We need to have a break for the  
 15 transcribers.  
 16 MR HENDERSON: My Lord, I'm very happy to but I only have  
 17 five minutes.  
 18 MR JUSTICE FRASER: All right, we will keep going then.  
 19 MR HENDERSON: 1399.1, if we go to page 14 {F/1399.1/14}.  
 20 You are obviously "Jay"; KB is?  
 21 A. Keith Bridges.  
 22 Q. Keith Bridges. He says:  
 23 "Okay thank you. Let's move on to the postage  
 24 claims for the moment. So in my letter I gave details  
 25 of the claims and the reversals that you completed since

153

1 25 August. I think my first question would be that  
 2 I know that you reversed them but why undertake them in  
 3 the first place bearing in mind these are, in effect you  
 4 are stating the transactions which took, well say the  
 5 transactions have taken place which you have used  
 6 official postage for which in effect did not take  
 7 place."  
 8 And you said:  
 9 "... I understand the actions were wrong, but the  
 10 money never left the office. The receipts were always  
 11 kept and I did reverse them but again it was just a form  
 12 of protest ..."  
 13 A. Yes.  
 14 Q. When you were warned about this you did reverse them,  
 15 didn't you?  
 16 A. Yes.  
 17 Q. But you hadn't told Post Office that you were doing that  
 18 at the time you were doing it?  
 19 A. I did.  
 20 Q. How did you do that?  
 21 A. Network business support.  
 22 Q. Okay. I have seen some references to this.  
 23 A. Yes.  
 24 Q. If we look at Post Office letter {F/1374.1}, this is  
 25 I think the letter that Mr Bridges was referring to and

154

1 in the third paragraph he says to you:  
 2 "I understand from our conversations on occasions  
 3 when this scenario has happened the branch has claimed  
 4 a compensating value in official postage and thereby  
 5 recovering the value of the postage label resulting in  
 6 no loss to the branch. Would you please in future  
 7 process by contacting the NBSC ..."  
 8 A. Yes.  
 9 Q. And if we look at the NBSC call log at {F/1286.1}, under  
 10 the "Remedy" tab, at row 216 and if you go right to  
 11 column I:  
 12 "PM wanted noting that due to a RM complaint cust  
 13 has over SD he is going to refund the customer SD as  
 14 official postage. Advised PM he cannot do that that and  
 15 I have advised him so."  
 16 And then in row 310 this is an event that is  
 17 discussed in your interview you have said:  
 18 "PM is putting in 4.34 X 10 ..."  
 19 So you felt there had been a discrepancy of £4.34  
 20 and you put in an official postage of ten times that, is  
 21 that right?  
 22 A. Yes, but if I can just explain the reason why  
 23 I multiplied it by ten: this was something I had noticed  
 24 before, the label transaction issue, and I reported it  
 25 using all official channels and nothing was ever done

155

1 and then the fact that it happened again and caused  
 2 a financial loss --  
 3 Q. You just put in official postage?  
 4 A. Yes.  
 5 Q. And just the final reference, {F/1252.1} is a letter  
 6 from an Andrew Morley, an internal Post Office letter  
 7 I think. If we go to the second page of that -- that  
 8 doesn't look right. It doesn't matter. It is a further  
 9 document where you mentioned that you were doing this.  
 10 When did you start taking official postage in this  
 11 sort of way?  
 12 A. I can't remember.  
 13 Q. And I have tried to take you to various entries that I'm  
 14 aware of where you notified Post Office, but it's right,  
 15 isn't it, that you didn't notify them on each and every  
 16 occasion that you were doing that, there was a whole  
 17 series of £100s that were referred to in your interview?  
 18 A. Yes, but I knew they were being recorded, so ...  
 19 I wasn't informing network business support centre but  
 20 because I was putting the entry onto the computer I knew  
 21 that there was a record of it.  
 22 Q. Well, it wouldn't be obvious to Post Office whether that  
 23 was official postage or not, would it, or whether you  
 24 had just helped yourself to it?  
 25 A. I think it would be obvious that it wasn't official

156



1 postage because of the amounts involved.  
 2 Q. All right.  
 3 Nothing further. If you just stay there, Mr Green  
 4 may have some questions.  
 5 MR JUSTICE FRASER: I assume not for very long, Mr Green.  
 6 MR GREEN: Really very short, my Lord.  
 7 MR JUSTICE FRASER: Yes.  
 8 Re-examination by MR GREEN  
 9 MR GREEN: Could you look back at {F/1365} please. This is  
 10 the document you were shown and let's leave aside for  
 11 the moment this is a 2015 version.  
 12 A. Yes.  
 13 Q. Just park that, because I think you have already made an  
 14 observation about what you did or did not have.  
 15 A. Yes.  
 16 Q. But at least as at 2015, do you see sort of halfway down  
 17 on the right-hand side there's a print-out?  
 18 A. Yes.  
 19 Q. Post Office.  
 20 A. Yes.  
 21 Q. And you come down and it says "Total due to customer:  
 22 102.34".  
 23 A. Yes.  
 24 Q. And it is in red.  
 25 A. Yes.

157

1 Q. Do you see that?  
 2 A. Yes.  
 3 Q. It says:  
 4 "You must take care to only settle with the customer  
 5 for the amount specified on the receipt ..."  
 6 A. Yes.  
 7 Q. Is that what you did?  
 8 A. Yes.  
 9 Q. And when we go to {F/1257.1}, which is the Facebook  
 10 post -- sorry, the Yahoo! -- the list.  
 11 A. Okay.  
 12 Q. It was put to you that this whole episode is a good  
 13 example of Horizon working well.  
 14 A. Yes.  
 15 Q. And I just wanted to take you through your  
 16 contemporaneous account of what happened very quickly.  
 17 A. Okay.  
 18 Q. So you begin:  
 19 "Yesterday during HOL failure ..."  
 20 A. Yes.  
 21 Q. Did you regard that as Horizon working well, when it  
 22 failed?  
 23 A. No.  
 24 Q. Okay. And it says:  
 25 "Transaction seemed to go through okay apart from

158

1 Horizon printing 3 identical receipts."  
 2 A. Yes.  
 3 Q. Was that what should have happened, three identical  
 4 receipts, or not?  
 5 A. Normally, no, that wouldn't happen.  
 6 Q. And then:  
 7 "Receipts showed a disconnected session ..."  
 8 A. Yes.  
 9 Q. Is it meant to have a disconnected session or not?  
 10 A. No.  
 11 Q. Okay. And then you get total due to customer, 195.04.  
 12 A. Yes.  
 13 Q. And you hand that over.  
 14 A. Yes.  
 15 Q. And then it says -- you say that:  
 16 "Because receipts showed cash due to customer, we  
 17 paid out."  
 18 Then:  
 19 "Come evening balancing till showed approximately  
 20 £200 loss."  
 21 A. Yes.  
 22 Q. Was that Horizon working correctly?  
 23 A. No.  
 24 Q. "Thought at time must be miscount and will try to sort  
 25 in morning.

159

1 "This morning produced transaction log for the  
 2 period of HOL FAILURE. No record of 195.04 transaction  
 3 at all !!!!"  
 4 A. No.  
 5 Q. Was that Horizon working well?  
 6 A. No.  
 7 Q. "Phoned helpline and was told by very irate member of  
 8 staff that loss is mine unless I can sort out with  
 9 customer directly ..."  
 10 A. Yes.  
 11 Q. Did you feel that that was a satisfactory response?  
 12 A. Absolutely not.  
 13 Q. "... apparently there is a message on screen during HOL  
 14 failure to not pay any money to customer ..."  
 15 Is that what you saw, or did you see a message that  
 16 said "Pay the customer £195"?  
 17 A. I cannot remember.  
 18 Q. "Asked irate staff to pass call up as I was not a happy  
 19 bunny, was told she was not going to do this ..."  
 20 A. Correct.  
 21 Q. Was that what you felt you should reasonably expect?  
 22 A. No.  
 23 Q. "... only after I asked to speak to contracts manager or  
 24 somebody from POL press office with regards to speaking  
 25 to press about my loss was I given a number for

160

1 Chesterfield ."  
 2 A. Correct.  
 3 Q. Did you think it was appropriate that you should have to  
 4 make those threats to get the relevant telephone number?  
 5 A. No.  
 6 Q. "So spoke to POCA lady at Chesterfield who after  
 7 pressing a few buttons was able to find transaction ..."  
 8 A. Yes.  
 9 Q. Did you think it was satisfactory that she could see  
 10 a transaction involving your branch that you couldn't  
 11 see?  
 12 A. No, it wasn't satisfactory .  
 13 Q. "She couldn't promise anything ..."  
 14 Did you find that satisfactory ?  
 15 A. No.  
 16 Q. "... but will see if she can get a credit TC after she  
 17 has spoken to Fujitsu??? She took my number and  
 18 promised to call back after speaking to Fujitsu , being  
 19 very non-committal about possible loss ."  
 20 Did you find that a satisfactory response?  
 21 A. No.  
 22 MR GREEN: My Lord, no further questions.  
 23 MR JUSTICE FRASER: No questions from me.  
 24 Thank you very much. I'm sorry you had to be asked  
 25 to leave court for a couple of minutes but sometimes

161

1 these things just happen and it is important that  
 2 sometimes there's a debate without a witness hearing  
 3 what it is .  
 4 Thank you very much, you are free to go.  
 5 We're going to have a short break for the  
 6 transcribers and then you are calling your next witness.  
 7 MR GREEN: Mr Patny.  
 8 MR JUSTICE FRASER: Is there any prospect of finishing him  
 9 today?  
 10 MR HENDERSON: I don't think so.  
 11 MR JUSTICE FRASER: All right. Are you cross-examining,  
 12 Mr Henderson?  
 13 MR HENDERSON: Yes.  
 14 MR JUSTICE FRASER: We will have five minutes until 10 to 4  
 15 and then we will run to about half past 4 but if you  
 16 find a convenient break at or around that time or  
 17 earlier it's up to you. Right, so until 10 to 4. Thank  
 18 you very much.  
 19 (3.44 pm)  
 20 (Short Break)  
 21 (3.52 pm)  
 22 MR GREEN: My Lord, I am going to call Mr Anup Patny.  
 23 MR ANUP PATNY (affirmed)  
 24 MR JUSTICE FRASER: Do have a seat.  
 25 A. Thank you.

162

1 Examination-in-chief by MR GREEN  
 2 MR GREEN: Mr Patny, in front of you is a folder and if you  
 3 kindly turn to tab 3 of that folder {E1/3} you see  
 4 a document that says "Witness statement of Anup Kumar  
 5 Patny".  
 6 A. Yes.  
 7 Q. And if you turn to the third page of that {E1/3/3}  
 8 there's a signature .  
 9 A. Yes.  
 10 Q. Is that your signature?  
 11 A. It is .  
 12 Q. And do you believe the contents of your statement to be  
 13 true?  
 14 A. Yes.  
 15 Q. Most grateful. Would you just wait there.  
 16 Cross-examination by MR HENDERSON  
 17 MR HENDERSON: Mr Patny, good afternoon.  
 18 A. Good afternoon, sir .  
 19 Q. You were subpostmaster in the Spencefield branch for  
 20 a relatively short time, between October 2014 and  
 21 August 2016, is that right?  
 22 A. Yes, sir .  
 23 Q. And you ran a retail business from the same premises?  
 24 A. Yes, sir .  
 25 Q. Are you still running that?

163

1 A. Yes, sir .  
 2 Q. And can you just describe what the set-up was when you  
 3 had the Post Office there?  
 4 A. Well, it's a single-counter Post Office. Well, it came  
 5 within my branch counter. We had two tills before for  
 6 the counter but we took one out for post office side and  
 7 retail side there's one counter for retail and one  
 8 counter for the post office .  
 9 Q. Okay. And it may sound like a silly question, but what  
 10 else do you sell in the newsagent? It is it just papers  
 11 and cigarettes and so forth?  
 12 A. Yes, newspapers -- mainly it is high in home news  
 13 deliveries and cigarettes and cards, stationary,  
 14 et cetera .  
 15 Q. How many other people work in the shop? We obviously  
 16 know about you and your son?  
 17 A. Yes, my wife, she ran -- she worked in the retail and  
 18 she worked in the post office as well, with one other  
 19 assistant .  
 20 Q. Okay, so four of you in total?  
 21 A. Yes, sir .  
 22 Q. Okay. So there was a separate post office counter in  
 23 the branch, is that right?  
 24 A. Yes, sir .  
 25 Q. And how does that work from a practical point of view?

164

1 If someone wants to buy something from the newsagent and  
 2 do something at the post office counter as well, how do  
 3 you sort that?  
 4 A. Well, most of the time there's one person allocated to  
 5 the post office. In the morning there's two people, in  
 6 the afternoon there's two people as well. I am there  
 7 floating to serve on the counter both sides. My wife,  
 8 she was there for the same reason as well. So whenever  
 9 somebody required, you know -- if my wife is like  
 10 serving on the post office side I would hop onto the  
 11 retail side and vice versa because there's two different  
 12 queues we had for post office queue and for retail  
 13 queue.  
 14 Q. And what if someone comes in and wants to buy  
 15 a newspaper and some cards and do something at the  
 16 post office counter as well, how does that work?  
 17 A. Well, they will have to go to the post office queue  
 18 afterwards or beforehand.  
 19 Q. Right. Now, you tell us in your witness statement that  
 20 you remmed in cash on 11 May 2016, I think.  
 21 A. Yes, sir.  
 22 Q. But your son undertook a balance on that same day, on  
 23 11 May. Do you remember that?  
 24 A. Yes, sir.  
 25 Q. And I want to ask you some questions about both of those

165

1 activities, but first of all, was that your usual  
 2 practice, was it you that would rem the cash in and your  
 3 son who would carry out what you call the balancing  
 4 exercise?  
 5 A. Most of the time, because me and my wife normally came  
 6 in in the morning. The cash normally came in just  
 7 before 12 o'clock. That would come in, I would check  
 8 the cash, rem in and then put it safe in the safe and  
 9 then my son would come in just in the afternoon and take  
 10 it from us.  
 11 Q. And he would do the balancing at the end of the day?  
 12 A. At the end of the day or every Wednesday, yes.  
 13 Q. And when you do the balancing, presumably it's not  
 14 uncommon that there's some sort of discrepancy between  
 15 the cash that Horizon expects you to have, for example,  
 16 and the cash you have actually got?  
 17 A. Well, it happens sometimes.  
 18 Q. Sure. And I'm just interested in how you reacted if you  
 19 found that there was a discrepancy. If it was just  
 20 a few pence or a few pounds would you just make up that  
 21 difference from your own pocket?  
 22 A. Well, under normal circumstances, yes, so if it is a few  
 23 pounds or few pence, yes.  
 24 Q. And if it was more than that, say £40, £50, £60 or  
 25 above, would you investigate it?

166

1 A. Yes.  
 2 Q. And raise it with Post Office?  
 3 A. Yes.  
 4 Q. Okay.  
 5 Now, I want to start off by asking you some  
 6 questions about an outage that took place on 9 May 2016.  
 7 Do you recall that?  
 8 A. Yes.  
 9 Q. This was a Horizon system outage, wasn't it, it wasn't  
 10 a power cut to your ...?  
 11 A. No, it was a Horizon outage.  
 12 Q. Can you recall how long it went on for?  
 13 A. To my memory I think it is just over an hour.  
 14 Q. Okay. And do you recall what you were doing at the time  
 15 of the outage?  
 16 A. Well, it was my wife -- she was serving on the  
 17 post office counter and the screen went black and we  
 18 couldn't do anything to the system. I think I have had  
 19 a customer come in saying that the post office down the  
 20 road -- it's a mile away from there -- they are having  
 21 problems. We thought nothing of it. I tried to ring  
 22 the helpline, couldn't go through, and found out later  
 23 on there was an outage.  
 24 Q. And you tell us you closed the branch at that time?  
 25 A. The branch was closed all that time, yes.

167

1 Q. We can see evidence of this outage if we go to  
 2 {F/1834.3}.  
 3 MR JUSTICE FRASER: You might need the other tab.  
 4 MR HENDERSON: Yes, I do need the other tab. If you go to  
 5 row 47. If you just highlight row 47.  
 6 MR JUSTICE FRASER: Can you see that okay, Mr Patny?  
 7 A. Yes.  
 8 MR JUSTICE FRASER: Because we can change the view. Can we  
 9 go to "View" in the top task bar please and just  
 10 increase the magnification. That might work a little  
 11 bit better, Mr Henderson. Can you work from that?  
 12 MR HENDERSON: Yes. It may mean going along a bit but  
 13 that's okay.  
 14 MR JUSTICE FRASER: Row 47.  
 15 MR HENDERSON: So row 47, do you see that highlighted,  
 16 Mr Patny?  
 17 A. I can see that.  
 18 Q. So that's at 8.22 and if we scroll right so we see the  
 19 full column at H. So "No recovery required", so this is  
 20 what tells Post Office that there has been an outage --  
 21 A. Okay.  
 22 Q. -- and you are logging back in. Do you see that? And  
 23 it says that no recovery procedure was required. That  
 24 suggests that there were no particular problems caused  
 25 by the outage as far as your session was concerned. Do

168

1 you see that?  
 2 A. I don't know.  
 3 Q. Well, what was going on -- what Ms van den Bogerd's  
 4 evidence is is if you look at -- you don't need to move  
 5 the screen, but if you look at row 42 and row 45, what  
 6 was going on at the time of the outage was that there  
 7 were two postage labels to be printed and that they were  
 8 printed, but it is possible that the transaction was  
 9 interrupted before it could be completed. Do you see  
 10 those entries?  
 11 A. Mm-hm, yes sir.  
 12 Q. So as far as this data is concerned, the worst case  
 13 scenario that could have occurred as a result of this  
 14 outage is that the labels might have been handed over  
 15 and payment taken in cash -- because the PIN pad won't  
 16 work when the Horizon terminal isn't working -- without  
 17 following the correct recovery process and what that  
 18 would result in is a small surplus of cash, not  
 19 a shortage. Do you accept that?  
 20 A. It looks that way, yes.  
 21 Q. Okay. But what this doesn't in any way suggest is that  
 22 the outage could have given rise to a discrepancy of  
 23 £17,000 or so, which is what I think you believe  
 24 happened?  
 25 A. Well, at this stage we didn't have the rem ins.

169

1 Q. No, I'm so sorry. The rem ins -- this is the 9 May,  
 2 this is before the rems.  
 3 A. Yes.  
 4 Q. Okay? We're just looking at the outage on 9 May at the  
 5 moment.  
 6 A. Yes.  
 7 Q. There's nothing in this data to suggest that at this  
 8 point it could possibly have caused a discrepancy of  
 9 £17,000. Do you see that?  
 10 A. I can see that there, yes.  
 11 Q. Now, you say in your evidence that you rang the helpline  
 12 and I think you said a moment ago in answer to  
 13 a question that you didn't manage to get through to the  
 14 helpline, is that right?  
 15 A. Yes, sir.  
 16 Q. Okay. I don't think that's explained in your witness  
 17 statement, but that's fine, we can agree on that.  
 18 But your position as I understand it is that this  
 19 outage was responsible in some way for a shortfall of  
 20 £17,000, is that right?  
 21 A. Might have been.  
 22 Q. Might have been or was?  
 23 A. Well, there's no other argument for that. I mean never  
 24 had a shortage before like, you know, all --  
 25 Q. Okay, well, let's have a look at it. I mean first of

170

1 all, do you agree that if it was the outage on 9 May  
 2 that caused a shortfall of £17,000, you would expect  
 3 that to show up on that day?  
 4 A. I think so, yes.  
 5 Q. Let's have a look at the event data spreadsheet at  
 6 1507.1 {F/1507.1}.  
 7 This is one where we will need to enable editing and  
 8 then remove the filter. Then if you could go to row --  
 9 if you go in the top left-hand corner if you just type  
 10 in D13904. If you can bring that row up to the top of  
 11 the screen.  
 12 This shows the cash declaration at the end of  
 13 9 May 2016. Do you see that, the cash declaration for  
 14 a total of £48,021?  
 15 A. Yes, sir.  
 16 Q. And below that it says that there is a discrepancy of  
 17 £1,138.21.  
 18 A. Yes, sir.  
 19 Q. So do you accept then that the outage that happened  
 20 earlier in that day could not have been responsible for  
 21 a £17,000 discrepancy arising?  
 22 A. I can't say that.  
 23 Q. Well, had it been responsible there would have been  
 24 a much higher discrepancy shown, wouldn't there, for  
 25 cash as a result of the declaration; isn't that right?

171

1 A. Could be.  
 2 Q. Well, it would be, wouldn't it?  
 3 A. I can't say that. I don't know.  
 4 Q. Well, let's look at the same document but the cash  
 5 declaration for 11 May, two days later. That's at  
 6 14515.  
 7 MR JUSTICE FRASER: Row?  
 8 MR HENDERSON: Row -- yes, 14515.  
 9 So on 11 May, two days later -- this is I think when  
 10 your son did the balance --  
 11 A. Yes, sir.  
 12 Q. This is just the daily cash declaration and we see there  
 13 a cash total of £71,000-odd and a discrepancy there of  
 14 17,339.  
 15 A. Yes, sir.  
 16 Q. And then when your son called the helpline on 11 May --  
 17 and we see that at {F/1522.1}, row 136. So if you again  
 18 enable editing and if you could bring that up to the  
 19 top.  
 20 So this is 11 May 2016, so the same date that we  
 21 have just been looking at for the cash discrepancy and  
 22 if you could go across to column N:  
 23 "Doing BP and got a shortage in cash £17,000. Had  
 24 a rem in of 46,500 cash, 16,000 coin."  
 25 That column is what's used by the help desk operator

172

1 to report what is said when someone rings up?  
 2 A. Yes.  
 3 Q. So it looks as though what your son had said was that  
 4 there had been a rem in of £16,000 worth of coins?  
 5 A. No, as I can remember Aakash came in home that night and  
 6 he said there was a shortage shown and he had phoned the  
 7 helpline and they said there has been a rem in of  
 8 £16,000 coins and they asked him to do some reversal or  
 9 something.  
 10 Q. Okay. Let's have a look -- if we just go over and look  
 11 at column V in that same row. So what he was told to do  
 12 according to this was ask the subpostmaster to make sure  
 13 only one cash declaration and make sure rem was scanned  
 14 in correctly. So it seems from this, doesn't it, that  
 15 the helpline thought that perhaps there had been  
 16 a problem -- either a problem with declaring the cash,  
 17 in other words counting it, or some sort of problem  
 18 remming it in?  
 19 A. No, remming in was fine.  
 20 Q. Well, let's look at how the discrepancy may actually  
 21 have arisen. So on 11 May -- let's have a look at  
 22 {F/1834.2}. This is the cash that was remmed in on  
 23 11 May, do you see that?  
 24 A. I can't see that clearly.  
 25 Q. No, okay. And the second row down shows that there was

173

1 £16,000 worth of £10 notes, do you see that? Do you see  
 2 the second entry?  
 3 A. Yes, I can see that.  
 4 Q. Okay, so I think there's £26,000 worth of £20 notes,  
 5 16,000 of £10, 4,500 of £5, 1,000 of £1 and then there  
 6 is coins. So I think the important one is £16,000 worth  
 7 of £10 notes.  
 8 Now, it's a bit fiddly this, but bear with me. If  
 9 we look at {F/1438.1}. This is filtered data, all  
 10 right, so we have put a filter on this just to show the  
 11 cash that was remmed in to your branch over this period  
 12 and you can see that there is highlighting on 11 May but  
 13 there was no cash remmed in on 12 May, the following  
 14 day. Are you able to recall whether that's right? You  
 15 have given evidence of the cash that you remmed in on  
 16 11 May, all I'm saying is that there was no cash remmed  
 17 in on 12 May.  
 18 A. Well, 11 May -- the cash comes in on a Wednesday, all  
 19 the time.  
 20 Q. Right, okay. So it wouldn't come in any other day?  
 21 A. Well, unless it came in by post, if he required some --  
 22 any time we would ask the ADC and they would send it,  
 23 like an emergency.  
 24 Q. All I'm suggesting to you is that there was cash remmed  
 25 in on the 11th and there was no cash remmed in on the

174

1 12th, as far as Post Office's records can tell.  
 2 A. Okay.  
 3 Q. Do you accept that?  
 4 A. Yes.  
 5 Q. Now, if we look at the cash management report for your  
 6 branch, which is at {F/1514.1}. Actually these relevant  
 7 rows are highlighted. Do you see the highlighting on  
 8 rows 383, 384 and 385?  
 9 A. Yes, sir.  
 10 Q. Okay.  
 11 If you could just scroll right a couple of cells.  
 12 Thank you, that's fine.  
 13 So the declaration on 10 May -- if you just look at  
 14 the £10 note column in column M, do you see that?  
 15 A. Yes, sir.  
 16 Q. So that's 16,070.  
 17 A. Yes, sir.  
 18 Q. Okay. And then we know that you remmed in £16,000 worth  
 19 of £10 notes on 11 May.  
 20 A. Yes, sir.  
 21 Q. But the 11 May £10 notes are only 22,130. So what you  
 22 would have expected, on 11 May, would be something like  
 23 £32,000 of £10 notes, which is the 16,000 from the 10th,  
 24 plus the 16,000 from the 11th, less any notes that had  
 25 been paid out in the course of 11 May; do you agree?

175

1 A. Yes, sir.  
 2 Q. And in fact, as we can see, there's only £22,130 worth  
 3 of £10 notes, but the cash declarations for the  
 4 following days in £10 notes are very much higher: 37,650  
 5 and 35,700. Do you see that?  
 6 A. I can see that, yes.  
 7 Q. And even though there had been no cash remmed in in that  
 8 period?  
 9 A. Well I think when my son rang the NBSC on that 11 May  
 10 they asked him to do some adjustments.  
 11 Q. Well, what I'm suggesting is that the most natural  
 12 explanation for this, whatever adjustments were made, is  
 13 that at some point on 11 May someone hadn't counted  
 14 a big pile of £10 notes. They had been put in a safe  
 15 and forgotten about, which is understandable, and that  
 16 they were found the next day, or located, and there was  
 17 an accurate cash declaration on 12 May.  
 18 A. I don't know about that, sir.  
 19 Q. It's perfectly plausible, isn't it?  
 20 A. I can't say anything to that.  
 21 Q. Well, the final piece of this little jigsaw is at  
 22 {F/1507.1} and I think you will need to --  
 23 MR JUSTICE FRASER: What document is this?  
 24 MR HENDERSON: This is going back to the events data showing  
 25 the cash declarations on 13 May. Now, we saw before

176

1 that on 11 May the cash discrepancy was minus £17,000.  
 2 Do you remember that? We looked at that a few moments  
 3 ago?  
 4 A. Yes, sir.  
 5 Q. And two days later the discrepancy is plus 17,000, in  
 6 other words it looks as though it has gone, it has  
 7 cancelled out. Do you see that?  
 8 A. I can see that, sir.  
 9 Q. So it's a bit of detective work and it's a bit fiddly  
 10 and I apologise for that, but doesn't it look overall as  
 11 though what the problem here was is nothing to do with  
 12 an outage, it's been a mistake somewhere in the branch,  
 13 temporary mistake, counting cash and once the cash count  
 14 was done properly, the problem disappeared?  
 15 A. I don't know, sir. I don't think so.  
 16 Q. You didn't suffer any loss as a result of this incident,  
 17 did you?  
 18 A. I still think this is because of the adjustments NBSC  
 19 had asked my son to make. I don't know.  
 20 Q. What I'm trying to put to you, I hope fairly, Mr Patny,  
 21 is your evidence is -- I think your evidence is that  
 22 there were some sort of problems in Horizon that caused  
 23 all of these difficulties and all I'm trying to  
 24 demonstrate to you is that if you go through the various  
 25 records that are available it looks as though in fact

177

1 there has just been a difficulty with declarations of  
 2 cash. Do you accept that?  
 3 (Pause).  
 4 A. I wouldn't know how to answer that.  
 5 Q. Well, let's just look at one other document which is  
 6 {F/1834.3}. Again I think we need to minimise it and go  
 7 to the other tab, sheet 1, and if you go to row 2336.  
 8 If you look at row H -- well, these are two entries.  
 9 Row 2336 and 2337 are two entries only seven minutes  
 10 apart, do you see that? One is at 17.28 and one is at  
 11 17.35, do you see that?  
 12 A. Yes, I can see that.  
 13 Q. Okay, thank you. Seven minutes apart for the same  
 14 sign-on, APA001 -- is that you or is that your son?  
 15 A. That's me, but it would be my son because that looks  
 16 like it has been logged on since the afternoon.  
 17 Q. So he was using your log on?  
 18 A. He was, yes.  
 19 Q. Why would he do that?  
 20 A. Well, normally between three of us nobody else would go  
 21 on apart from the three of us, so we didn't really mind,  
 22 whosoever is logged on we just carried on and continued  
 23 with it.  
 24 Q. If you look there are two cash declarations seven  
 25 minutes apart, one for £68,000-odd and one for

178

1 £52,000-odd.  
 2 A. Yes, I can see that.  
 3 Q. Now, I can also show you -- and my apologies that this  
 4 is slightly painful in terms of how long it takes, but  
 5 if we go to {F/1482.1} --  
 6 MR JUSTICE FRASER: Do you mean within this document or  
 7 a different document?  
 8 MR HENDERSON: No, sorry, a different document, F/1482.1.  
 9 And we will need to do the tab at the bottom. And if we  
 10 go to row 4323, this is the transaction data for the  
 11 branch. Thank you.  
 12 Between those two times that I told you about, those  
 13 two declarations, if you see 4323 is at 17.28, there is  
 14 a single transaction for a £300 cash withdrawal, do you  
 15 see that in row 4323?  
 16 A. Yes, sir.  
 17 Q. Okay.  
 18 So the picture that emerges, I'm suggesting,  
 19 Mr Patny, is this, that you've got two cash declarations  
 20 minutes apart, substantial difference in value, which  
 21 isn't explained by any transactions. Do you see that?  
 22 A. Yes, I can see that.  
 23 Q. Okay. What I'm suggesting to you is that things were  
 24 pretty chaotic in your branch when it comes to these  
 25 sorts of things. The cash declarations look like they

179

1 are all over the place. Is that a fair observation?  
 2 A. Sometimes when you do the cash declaration, say if you  
 3 wanted to change something for that particular column,  
 4 you just have to delete that section to put in a new  
 5 figure. Sometimes what happened is if you carried on  
 6 adding the digits in, that would take it -- you are  
 7 thinking that you put the right amount in and just  
 8 crosses the declaration and that cancelled declaration  
 9 comes wrong.  
 10 Q. I don't understand that, I'm sorry.  
 11 A. Like when you declare the cash -- I mean I haven't done  
 12 that so many times, my son had done it. When you  
 13 declare the cash, all the coins and notes, you put in  
 14 the entry how much you got in there. If you see under  
 15 the declaration, if there's a difference, if you check  
 16 your balance and everything, if you -- say you counted  
 17 the cash again and if there's a difference in there and  
 18 you have to log on to change to that particular  
 19 denomination -- the amount of that denomination, if you  
 20 don't delete that amount and put a new entry in,  
 21 sometimes what happens is if you put some figure in it  
 22 just adds onto that figure and you are thinking that you  
 23 have changed that value and you process it again and  
 24 then it shows an amount, the difference amount.  
 25 Q. Mr Patny, your evidence, as I understand it, is that

180

1 your experience of Horizon leads you to conclude that  
 2 there are bugs in the Horizon system.  
 3 A. Well, how else -- I mean these shortages have occurred  
 4 and there's no explanation to that.  
 5 Q. Well, I'm suggesting to you that there's a perfectly  
 6 sensible explanation, which is that as far as we can  
 7 see, none of the events that you refer to are consistent  
 8 with there being a serious problem in Horizon and all of  
 9 them are consistent with things being pretty chaotic in  
 10 your branch.  
 11 A. But where the cash has gone then?  
 12 Q. Are you suggesting that you actually lost this cash?  
 13 A. No.  
 14 MR HENDERSON: My Lord, I don't have a great deal more, but  
 15 it is now 4.30.  
 16 MR JUSTICE FRASER: I assume you are going to put the  
 17 detailed points to Mr Patny's son about what he in fact  
 18 did and was told, are you? On the basis that he was the  
 19 one who called the helpline and --  
 20 MR HENDERSON: Yes, but I mean the records are the records  
 21 but --  
 22 MR JUSTICE FRASER: Well, Mr Henderson, that's not really  
 23 an answer to my question.  
 24 MR HENDERSON: I wasn't intending to repeat  
 25 cross-examination that I have already done.

181

1 MR JUSTICE FRASER: I didn't interrupt you because obviously  
 2 this gentleman's log in was used and he is the  
 3 subpostmaster but I'm not going to have his son  
 4 cross-examined by proxy through him so you are going to  
 5 have to put some of these points to his son.  
 6 MR HENDERSON: Okay, that's fine.  
 7 MR JUSTICE FRASER: Do you think you will be longer than  
 8 five minutes with this ...  
 9 MR HENDERSON: Possibly, yes.  
 10 MR JUSTICE FRASER: All right, I think we will stop until  
 11 tomorrow.  
 12 Right, Mr Patny, this just happens sometimes so  
 13 don't -- it's not ideal, but you are going to have to  
 14 come back tomorrow.  
 15 A. Okay.  
 16 MR JUSTICE FRASER: Because you are in the middle of your  
 17 cross-examination that means you mustn't discuss things  
 18 connected with the case or your evidence with anyone  
 19 overnight.  
 20 A. Yes, my Lord.  
 21 MR JUSTICE FRASER: In your situation that's going to be  
 22 probably harder because obviously you worked with your  
 23 wife and your son as well, but please don't discuss your  
 24 evidence with either of them and come back tomorrow at  
 25 10.30.

182

1 A. My Lord.  
 2 MR JUSTICE FRASER: Is that all right?  
 3 A. Yes, sir.  
 4 MR JUSTICE FRASER: Anything else in terms of the evidence?  
 5 Don't think so.  
 6 MR GREEN: My Lord, there was just one thing that  
 7 your Lordship asked us for yesterday.  
 8 MR JUSTICE FRASER: Hold on a second, I can let Mr Patny go.  
 9 MR GREEN: I'm sorry.  
 10 MR JUSTICE FRASER: I can let Mr Patny go.  
 11 You can leave the witness box by all means, we have  
 12 a few bits and pieces to sort out.  
 13 Mr Green.  
 14 Housekeeping  
 15 MR GREEN: Your Lordship asked whether we had a list of all  
 16 the branches affected by Callendar Square.  
 17 MR JUSTICE FRASER: If you have give me the reference or  
 18 hand it up rather than read it out.  
 19 MR GREEN: What we have is a document which has  
 20 Callendar Square and some others on it.  
 21 MR JUSTICE FRASER: How many are there?  
 22 MR GREEN: There are 20 that it records as having been  
 23 affected and others that reported problems but probably  
 24 didn't have losses, it says.  
 25 MR JUSTICE FRASER: Is it on Magnum?

183

1 MR GREEN: It is. It is {F/322.1} and we don't know whether  
 2 that's the same list that Mr Godeseth is referring to at  
 3 {E2/7/5}, paragraph 15.  
 4 MR JUSTICE FRASER: Well, Mr Godeseth is not being  
 5 cross-examined until next week.  
 6 MR GREEN: Of course.  
 7 MR JUSTICE FRASER: So I'm sure Mr De Garr Robinson and  
 8 Mr Henderson and Mr Draper between them will let you  
 9 know if it is what he is talking about, if it is not I'm  
 10 sure they'll tell you which one he has. But I can now  
 11 go and have a look at it, all right.  
 12 You and Mr De Garr Robinson were going to tell me  
 13 about your proposals for closings insofar as you had  
 14 thought about it? Is that right?  
 15 MR GREEN: My Lord, yes, I have discussed it with my learned  
 16 friend --  
 17 MR JUSTICE FRASER: Just give me some dates if you have  
 18 agreed them.  
 19 MR GREEN: It is the 8th and 9th.  
 20 MR DE GARR ROBINSON: My Lord, yes. My learned friend's  
 21 team has problems the previous week so he suggested  
 22 8 and 9 May.  
 23 MR JUSTICE FRASER: Can you just remind me --  
 24 MR GREEN: It is Wednesday the 8th and Thursday the 9th.  
 25 MR JUSTICE FRASER: Do those dates work for you,

184

1 Mr De Garr Robinson?  
 2 MR DE GARR ROBINSON: My Lord, yes. There is one member of  
 3 the team that won't be able to be here but we can close  
 4 orally on that basis.  
 5 MR JUSTICE FRASER: All right. A day each?  
 6 MR GREEN: My Lord, yes.  
 7 MR JUSTICE FRASER: Given it is going to be some weeks later  
 8 than initially planned I'm going to ask for the closings  
 9 to be submitted somewhat earlier than normal and I will  
 10 just have to think about when that's going to be.  
 11 MR DE GARR ROBINSON: My Lord, I quite understand. I mean  
 12 I would ask for --  
 13 MR JUSTICE FRASER: You want as much time as possible of  
 14 course.  
 15 MR DE GARR ROBINSON: Your Lordship didn't need me to say  
 16 that.  
 17 MR JUSTICE FRASER: No, no, I know you want as much time as  
 18 possible and I will try and give you as much time as  
 19 possible, but if it is going to be then I will give  
 20 myself more than the usual 48 hours to read them.  
 21 MR DE GARR ROBINSON: My Lord of course.  
 22 MR JUSTICE FRASER: I will of course take that into account.  
 23 Anything else tonight? No. So we will resume with  
 24 Mr Patny senior tomorrow and then after him it is  
 25 Mr Patny -- his son. Thank you all very much.

185

1 (4.35 pm)  
 2 (The court adjourned until 10.30 am on Wednesday,  
 3 13 March 2019)  
 4  
 5  
 6  
 7  
 8  
 9  
 10  
 11  
 12  
 13  
 14  
 15  
 16  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

186

1  
 2 INDEX  
 3  
 4 MR ADREES LATIF (affirmed) .....1  
 5 Examination-in-chief by MR GREEN .....2  
 6 Cross-examination by MR DRAPER .....2  
 7 Re-examination by MR GREEN .....94  
 8 Questions from MR JUSTICE FRASER .....97  
 9 MR JAYESH TANK (affirmed) .....99  
 10 Examination-in-chief by MR GREEN .....99  
 11 Cross-examination by MR HENDERSON .....100  
 12 Re-examination by MR GREEN .....157  
 13 MR ANUP PATNY (affirmed) .....162  
 14 Examination-in-chief by MR GREEN .....163  
 15 Cross-examination by MR HENDERSON .....163  
 16 Housekeeping .....183  
 17  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

187

188



<b>A</b>	74:12 75:15,25 80:25 81:2,4 82:5 88:5	61:5 76:18 97:15 106:5 110:14 112:25 114:21 117:2	27:18 60:12 157:1	<b>arrived (1)</b> 58:7	<b>average (1)</b> 5:24	<b>beared (1)</b> 124:23
<b>a237 (1)</b> 133:5	<b>acknowledgments (1)</b> 66:25	122:4,6,7,10 128:7 131:3 135:13 145:23	<b>analysed (1)</b> 87:3	<b>aside (1)</b> 157:10	<b>aware (13)</b> 6:24 26:23 47:7 59:5 70:24 104:7	<b>bearing (1)</b> 154:3
<b>a4 (3)</b> 138:19,19 139:2	<b>across (10)</b> 34:4 49:4,5 95:17 96:14 107:4	146:8,10,16,22 154:11 156:1 172:17 178:6 180:17,23	<b>andrew (1)</b> 156:6	<b>ask (38)</b> 2:22 3:1 8:13,22 11:11 12:14 13:5 24:11 29:11	106:14,20 119:9 123:10 130:25 146:15 156:14	<b>became (2)</b> 47:7 48:3
<b>a8 (1)</b> 113:14	123:1 140:16,17 172:22	<b>against (1)</b> 149:11	<b>anomaly (1)</b> 117:3	31:10 32:1 33:24 37:2 39:23 45:10 49:12 56:7,24 57:3 59:20 66:19 80:7 83:6 86:11 94:9,10 106:5 107:22	<b>become (1)</b> 105:15	<b>becomes (1)</b> 135:1
<b>aa (43)</b> 9:5,24 10:1,10 13:8 14:13,21 16:5,9,9,17 17:4,10 20:9 21:3 23:7 24:10 25:19 37:20 39:3,4,14,16 47:12,15,19 48:1,18,25 50:4,21 51:1,3,20 52:8 53:2,22 60:16 61:1,12 62:5 64:18 73:5	<b>action (1)</b> 129:7	<b>ago (12)</b> 26:13 40:14 57:17 68:5 76:16 83:21 102:13 107:9,19 124:25 170:12 177:3	<b>another (15)</b> 34:6 47:25 48:5,12 63:16 75:1 84:20 88:15 113:23,23 121:7 139:16 144:8 152:24 153:1	<b>asked (17)</b> 12:9 66:21 67:23 83:21 94:24 105:16,20 139:14 144:15 160:18,23 161:24 173:8 176:10 177:19 183:7,15	<b>away (9)</b> 8:11 78:1,1,2 87:10 110:10,15,17 167:20	<b>before (44)</b> 1:4 6:1 11:7 16:16 29:1 35:23 37:18 44:21 46:9 48:9,11 51:5 53:1,6 59:9 61:20 68:7 75:3 83:8 85:25 88:9 89:10 90:18 92:17 103:10 110:14,19 115:4 122:6 125:17 132:1,23 135:7 136:11 139:14 149:15 150:9 155:24 164:5 166:7 169:9 170:2,24 176:25
<b>aakash (1)</b> 173:5	<b>actions (5)</b> 12:1 105:1 134:23 137:6 154:9	<b>agreed (8)</b> 59:7 82:7 85:25 87:15 88:22 112:1 125:17 184:18	<b>answer (20)</b> 1:9 23:18 24:25 28:6 33:18 44:19 45:7 52:13 55:7,14 89:25 94:23 133:17 144:13,17 150:11,20 170:12 178:4 181:23	<b>asking (12)</b> 9:2 18:12 32:7 74:3,15,17,25 94:16 117:16 127:13 150:18 167:5	<b>back (83)</b> 3:13,20 10:2 11:23 15:17 16:9 17:3,24 20:24 21:3 22:6 23:7,18,20 24:10 28:9 29:7 35:21 36:20 37:13 38:7 39:4,13 43:5,18 45:5 47:6,13,19 51:1,5 60:22 63:6,12 69:6 72:11 82:10,16 83:3 84:3 85:6,10,17 87:13 88:1,10,17 89:9,24 91:12 92:13,19 97:13,14,16 98:10 99:3 103:9,14 107:5,8,9 117:23 122:2,5,6 124:22,24 125:1,4 129:22 131:19 132:20 133:20 136:11 150:2 151:18 157:9 161:18 168:22 176:24 182:14,24	<b>beforehand (1)</b> 165:18
<b>ability (1)</b> 124:2	<b>activities (1)</b> 166:1	<b>agrees (2)</b> 83:15 118:13	<b>answered (2)</b> 73:23 75:22	<b>asks (1)</b> 150:9	<b>background (4)</b> 3:2 29:3 104:21 144:25	<b>beg (1)</b> 60:18
<b>able (19)</b> 2:10 28:19 29:23 59:22 92:14 98:19 106:1,10 107:8 108:13 111:2,4 121:3 127:4 132:24 146:12 161:7 174:14 185:3	<b>activity (1)</b> 114:3	<b>ah (1)</b> 131:16	<b>answering (1)</b> 150:12	<b>assigned (1)</b> 77:3	<b>backup (1)</b> 26:15	<b>begin (2)</b> 1:4 158:18
<b>above (1)</b> 166:25	<b>actual (1)</b> 113:2	<b>aie (1)</b> 41:9	<b>answers (3)</b> 29:13,24 79:12	<b>assist (1)</b> 109:5	<b>backwards (2)</b> 113:1 122:25	<b>behalf (2)</b> 18:5,11
<b>absence (1)</b> 149:8	<b>actually (21)</b> 37:1 63:6 68:9 74:20 95:15 103:10 109:1 113:4 119:2 122:20 124:24 131:12 138:12 140:15 144:3 148:20 152:20 166:16 173:20 175:6 181:12	<b>air (2)</b> 26:18 152:15	<b>anup (5)</b> 99:8 162:22,23 163:4 187:13	<b>assistance (2)</b> 32:8 112:3	<b>being (19)</b> 11:21 32:10 62:4 83:3 98:6 103:16 104:8,24 107:8 111:24 122:22 130:1 134:16 141:11 156:18 161:18 181:8,9 184:4	<b>behaviour (1)</b> 28:5
<b>absolutely (3)</b> 24:17 100:4 160:12	<b>address (3)</b> 59:13 83:12 89:8	<b>ala (1)</b> 5:15	<b>anyhow (2)</b> 19:14 46:13	<b>assistant (6)</b> 63:18 64:7,11 91:21 139:16 164:19	<b>believe (16)</b> 2:18 40:4,14 66:17 69:21 71:2 73:15 79:7,9 100:1,21 108:18 133:4 136:15 163:12 169:23 171:16	<b>behind (4)</b> 10:2,11 31:19 38:20
<b>accept (40)</b> 9:20 20:17 28:7 38:6 40:8 43:21 44:1 53:19 55:23 56:22 60:5 65:13 66:3,5 70:4,5,11,13,14,15 72:12 76:18 80:15,23 91:3,5,6 93:7 96:17 114:14 123:7 139:6 140:11 141:12 147:17,22 169:19 171:19 175:3 178:2	<b>ad (1)</b> 95:23	<b>ala001 (2)</b> 5:12 37:25	<b>anything (14)</b> 9:23 19:12 24:7 25:21 48:23 72:22 120:2 125:11 129:8 161:13 167:18 176:20 183:4 185:23	<b>assistants (20)</b> 3:23 4:3,6,12 5:4,19 6:2,6,15,20 31:24 33:24 40:7 42:4,9 67:17 67:17,23 92:21 101:21	<b>balance (15)</b> 6:23,24 27:12,13 46:10,14,19 48:5 81:13 90:8 126:24 130:9 165:22 172:10 180:16	<b>belief (1)</b> 108:7
<b>accepted (3)</b> 74:12 76:14 140:2	<b>ad (1)</b> 180:6	<b>allegations (1)</b> 90:24	<b>anyway (1)</b> 109:12	<b>assisting (1)</b> 32:25	<b>balanced (3)</b> 16:13 47:12 51:13	<b>believed (1)</b> 53:22
<b>accepting (2)</b> 41:9 95:21	<b>additional (2)</b> 6:3 13:24	<b>allege (1)</b> 47:6	<b>anywhere (5)</b> 24:9 49:23 51:24 112:18 152:16	<b>assume (5)</b> 16:16 52:2 103:11 157:5 181:16	<b>balancing (8)</b> 6:22 31:17 92:17 128:22 159:19 166:3,11,13	<b>below (7)</b> 10:22 44:5 97:1 122:17 135:13,20 171:16
<b>accepts (1)</b> 9:1	<b>addressed (1)</b> 87:21	<b>alleged (3)</b> 39:24 109:16 116:13	<b>apologise (4)</b> 112:1 113:2 144:9 179:3	<b>atm (1)</b> 121:1	<b>bank (6)</b> 120:18 121:1,7,20 122:18,23	<b>best (5)</b> 5:3 78:18 85:15 108:7 124:2
<b>access (12)</b> 29:5,10 35:21 36:11,12 52:1 57:25 58:3 106:1,10 127:2,6	<b>adds (1)</b> 180:6	<b>alleged (1)</b> 87:25	<b>apologise (6)</b> 29:15 50:9 117:5,6 139:15 177:10	<b>attached (3)</b> 101:17 103:5 138:3	<b>banking (2)</b> 120:9 141:20	<b>better (1)</b> 168:11
<b>accessible (1)</b> 71:17	<b>adjacent (1)</b> 10:8	<b>alleges (1)</b> 146:25	<b>apologies (4)</b> 112:1 113:2 144:9 179:3	<b>attempt (2)</b> 22:14 141:25	<b>banks (1)</b> 121:13	<b>between (22)</b> 10:5 11:20 31:5 33:25 34:14 35:16 36:25 40:25 41:1 45:12 46:3 58:2 61:1 64:21,25 65:23 143:17 163:20 166:14 178:20 179:12 184:8
<b>accessing (1)</b> 28:14	<b>adjoined (1)</b> 186:2	<b>allows (1)</b> 146:25	<b>apologise (6)</b> 29:15 50:9 117:5,6 139:15 177:10	<b>attempted (1)</b> 31:6	<b>bar (1)</b> 168:9	<b>bill (1)</b> 92:22
<b>accidentally (2)</b> 92:22 122:21	<b>adjourned (1)</b> 99:12	<b>almost (2)</b> 73:7 101:11	<b>apart (10)</b> 17:19 58:4 101:12 128:14 158:25 178:10,13,21,25 179:20	<b>attend (1)</b> 7:8	<b>barnett (23)</b> 4:8,15,23 6:5,14,19,21 7:2,11 23:6 24:1 27:4 35:8 61:14 62:5 73:4,16,19,24 74:20 75:5 76:2,5	<b>bit (22)</b> 8:19 12:6 18:8,12 23:23 49:7 57:25 59:19 62:2 101:7 103:1,17 104:23 113:1 122:9 123:8 146:12 168:11,12 174:8 177:9,9
<b>accounting (1)</b> 173:12	<b>adjusted (1)</b> 180:6	<b>along (3)</b> 33:17 44:3 168:12	<b>apart (10)</b> 17:19 58:4 101:12 128:14 158:25 178:10,13,21,25 179:20	<b>attention (4)</b> 79:11 83:9,10 150:17 115:23 143:17 163:20	<b>based (8)</b> 56:18 69:2 119:24 123:15,21 125:22 132:12 149:22	<b>bits (3)</b> 75:7 117:24 183:12
<b>account (29)</b> 8:22 13:4 45:22 51:3,18 52:7 75:15 92:4,5,6 109:25 120:16,18,20,23 121:3,4,7,11,12,17,25 122:14 129:25 130:16 132:1 142:2 158:16 185:22	<b>advised (3)</b> 34:19 155:14,15	<b>already (8)</b> 6:24 17:4 30:8 112:1 125:17 140:1 157:13 181:25	<b>apart (10)</b> 17:19 58:4 101:12 128:14 158:25 178:10,13,21,25 179:20	<b>audit (14)</b> 87:5,6 88:12 89:2,6,10,11,21 90:13,18 93:22 97:17,23 98:1	<b>basically (1)</b> 83:2	<b>black (1)</b> 167:17
<b>accounted (1)</b> 69:11	<b>advised (3)</b> 34:19 155:14,15	<b>also (37)</b> 3:16 6:9 13:21 14:6 16:7,25 17:9 18:1,3,23 19:18 21:12 30:13,17 31:9 40:9 43:20 49:24 51:24 54:20 57:12 62:14 70:20 86:4 93:13 98:16 114:17,18 116:15,16 120:1 122:22 128:17 141:25 147:8 151:3 179:3	<b>apart (10)</b> 17:19 58:4 101:12 128:14 158:25 178:10,13,21,25 179:20	<b>auditor (3)</b> 87:6,8 90:15	<b>basing (1)</b> 125:21	<b>blah (3)</b> 128:18,19,19
<b>accounting (2)</b> 31:16 51:22	<b>advised (3)</b> 34:19 155:14,15	<b>alternative (1)</b> 74:8	<b>apart (10)</b> 17:19 58:4 101:12 128:14 158:25 178:10,13,21,25 179:20	<b>august (17)</b> 40:24,24 41:1 44:10 45:12 46:3,24 56:16,20 65:22 116:17 117:1,15,20 151:5 154:1 163:21	<b>basis (9)</b> 7:1 35:15 44:17 64:24 66:6 74:6 85:13 181:18 185:4	<b>blue (1)</b> 139:3
<b>accurate (5)</b> 12:12,22 109:18 134:8 176:17	<b>advised (3)</b> 34:19 155:14,15	<b>always (7)</b> 26:23,23 27:9 43:12 115:20 152:5 154:10	<b>apart (10)</b> 17:19 58:4 101:12 128:14 158:25 178:10,13,21,25 179:20	<b>authorized (1)</b> 75:11	<b>basket (1)</b> 141:23	<b>bogerd (14)</b> 11:5 56:14 57:9 60:23 65:21 79:19 80:8 81:21 82:4 83:7 86:22 87:3,14 146:2
<b>acknowledgement (1)</b> 68:12	<b>advised (3)</b> 34:19 155:14,15	<b>amended (3)</b> 2:10 115:2,9	<b>apart (10)</b> 17:19 58:4 101:12 128:14 158:25 178:10,13,21,25 179:20	<b>automated (1)</b> 145:2	<b>basket (1)</b> 141:23	
<b>acknowledgements (8)</b> 41:22 66:24 68:15 70:8 73:2,3 89:15 90:2	<b>advised (3)</b> 34:19 155:14,15	<b>amount (14)</b> 10:19 42:5 43:1,2 46:3 96:24 113:4 142:10 158:5 180:7,19,20,24,24	<b>apart (10)</b> 17:19 58:4 101:12 128:14 158:25 178:10,13,21,25 179:20	<b>automatic (3)</b> 13:16,18,18	<b>bear (5)</b> 23:16 94:20 124:22 143:18 174:8	
<b>acknowledgment (14)</b> 67:1,2,3 69:9,17 73:7	<b>advised (3)</b> 34:19 155:14,15	<b>amounts (4)</b> 23:18	<b>apart (10)</b> 17:19 58:4 101:12 128:14 158:25 178:10,13,21,25 179:20	<b>automatically (11)</b> 13:20 70:4 72:24 75:19 76:8,8 135:5,7 137:12,17 138:2		

bogers (18) 56:8,22 78:25 84:9 86:1 88:11 100:9 102:14 106:15 107:12,17 116:9 118:9 125:9,18 133:25 147:14 169:3 boneham (1) 119:23 book (1) 24:22 books (2) 27:12,13 both (12) 4:13 7:2 14:10 16:18 27:3,5 61:1 65:2,3 74:17 165:7,25 bottom (13) 11:11 86:12 89:18 113:16 116:12,14 129:6 132:18,24,25 134:4 140:22 179:9 box (8) 94:14 96:25 105:20,21 108:15 113:14 117:24 183:11 bp (1) 172:23 branch (89) 3:2,5,6,24 4:4,6 6:19 7:6,19 8:3 9:6 19:15,20 22:21 23:4 24:6,8 33:4,11 34:7 35:1,6 41:9 42:8,19 45:22 46:2 53:7 56:17 58:11,20 63:9 68:7 69:6,10,15,17,22 70:15 72:24 73:11 75:9,11,14 76:10 77:8 80:9,10,11,23 82:21 87:17,20 88:1,9,10,14,20 89:18 91:8,14 92:16 93:1,3,10,17 97:5 101:8,13 110:12 115:19 141:3,8 142:3 151:4 155:3,6 161:10 163:19 164:5,23 167:24,25 174:11 175:6 177:12 179:11,24 181:10 branches (5) 19:15 31:15 70:23 71:4 183:16 break (23) 35:24 36:1,20,23 37:2,8,13,16,18 53:6 84:1,2,6,24 85:6,12,16,22,25 153:14 162:5,16,20 breaks (2) 36:25 37:5 bridges (3) 153:21,22 154:25 brief (3) 18:8 104:20 145:14 bring (5) 20:24 113:17 122:8 171:10 172:18 brings (1) 21:2 broadly (1) 60:10 brother (2) 64:6,14 brumwell (1) 4:23 bug (4) 89:19 90:3 93:11,13 bugs (2) 1:11 181:2 building (1) 109:22 built (1) 148:4 bundle (2) 1:6 99:17 bunny (1) 160:19 business (10) 18:7 20:1	69:3,3 145:2 151:16 152:3 154:21 156:19 163:23 busy (2) 22:2 101:13 button (5) 21:1,1 92:2,5,6 buttons (4) 25:9 42:5 92:1 161:7 buy (2) 165:1,14 buys (1) 69:5  C c600 (1) 112:16 caddington (5) 3:5,6 91:15 93:17 97:6 calculation (1) 47:9 call (60) 4:2 31:25 32:4,5,15,17 33:1,1,3,11,19 34:6 39:20 40:5,11,15,15,23,24 41:6,6,10,14,16 42:3,9 44:10,11,14,16,18,22 45:12 56:1 57:16 58:17 59:3 70:18 89:11,12 91:12,14,16 92:23 95:1 97:2 99:14 102:18,22 140:14,19 141:3 144:1 145:2 155:9 160:18 161:18 162:22 166:3 called (14) 9:10,11 39:24 55:1 63:8 71:24 72:1,2 97:24 127:5 128:1 141:7 172:16 181:19 callendar (3) 1:11 183:16,20 caller (1) 95:18 calling (2) 66:10 162:6 calls (13) 32:19 35:11 40:6 41:1 45:12 56:4 58:4 67:20 70:19 87:11 89:7 90:17 96:12 came (16) 29:1 68:12,15 91:24 97:13,14,16 106:15 109:5 139:11 146:8 164:4 166:5,6 173:5 174:21 camelot (17) 67:7,8 68:25 69:1,2,15,20 71:6,12,15 75:10,11,16 89:8 90:5,12 97:14 camelots (1) 71:10 camera (3) 25:13,17,21 cameras (1) 25:20 cancelable (1) 135:16 cancelled (5) 88:4 134:16 141:25 177:7 180:8 candily (1) 138:23 cannot (14) 29:10 36:16 38:6,21,21 40:1 46:7 52:1 70:14 84:14 93:6 130:24 155:14 160:17 cant (21) 23:13,19 31:1 35:13 43:23 45:7 64:10 70:5 91:1 123:15,17,22 124:8 125:10 132:18 139:17	156:12 171:22 172:3 173:24 176:20 car (1) 44:5 card (16) 109:25 120:16,20,22 121:3,6,7,11,19 122:14 128:13 129:25 130:16 132:1 135:18,22 cards (3) 101:18 164:13 165:15 care (2) 106:24 158:4 carefully (1) 21:10 carried (14) 8:15 16:10 20:9 37:19,22 38:3,9 39:17 87:20 97:23 104:25 119:20 178:22 180:5 carry (8) 27:24 28:8 30:13 38:13 46:10 110:19 137:7 166:3 cases (2) 42:22 150:15 cash (11) 10:10,12,18,21 11:1,2,19,22,24 12:2 14:22 16:5,8,10,11,16,17,24 17:19 19:3,5 20:12,24 22:14 24:20,20 30:15,17 39:8,9,10,13 47:9,11,14,19,20,25 48:5,9 49:24 51:3,10,11,20 52:8,14,16 53:1,3,22 60:16 65:5,8 87:21 92:8 101:14,15 116:15 120:12,13,22 121:15 122:1,17,21 123:19 126:24 128:20 142:1 159:16 165:20 166:2,6,8,15,16 169:15,18 171:12,13,25 172:4,12,13,21,23,24 173:13,16,22 174:11,13,15,16,18,24,25 175:5 176:3,7,17,25 177:1,13,13 178:2,24 179:14,19,25 180:2,11,13,17 181:11,12 cashed (1) 130:5 cassette (2) 10:15,16 catch (1) 25:21 cater (1) 148:4 cause (2) 96:18 131:4 caused (13) 49:10 51:19 67:15 87:17 117:20 142:17,20,22 156:1 168:24 170:8 171:2 177:22 causing (2) 54:17 152:9 caution (1) 149:9 cctv (24) 18:24 19:7,18 22:6,19,23 23:9,25 24:4 25:4,13,23 26:2,10,14 27:2 92:9 120:1,2,6 122:25 123:4,11,21 ceased (1) 93:16 cells (1) 175:11 centrally (1) 112:17 centre (4) 32:17 141:24	145:3 156:19 certain (6) 70:1 96:24 104:25 114:5,8 152:8 cetera (2) 135:22 164:14 challenge (1) 91:1 change (6) 76:20 77:17 78:8 168:8 180:3,18 changed (3) 77:21 141:21 180:23 changes (3) 18:4 30:14 72:22 channel (3) 25:16,20 71:5 channels (2) 152:14 155:25 chaotic (2) 179:24 181:9 charge (8) 27:24 28:8 charged (1) 145:21 charts (1) 136:12 chasing (2) 97:15,15 check (14) 9:16 15:25 19:7 23:14 24:24 30:17 33:13 67:23 68:6 82:18,21 89:11 166:7 180:15 checkability (1) 22:24 checked (9) 18:24 19:18 27:2 43:4 60:24 68:8,17 92:8 122:24 checking (3) 24:4 68:3 101:13 checks (6) 19:24 29:2 30:13 46:10,18 48:7 cheque (1) 91:9 chesterfield (2) 161:1,6 chip (1) 103:18 choice (1) 70:13 choose (1) 13:21 chris (3) 41:6,16 95:18 christine (22) 4:8,15,18,22,23 6:4,7,14 7:2,11 23:5 24:17 35:8 61:14,16 62:5,12 73:4,15,16,16 74:2 chronological (2) 44:22,23 cigarettes (2) 164:11,13 circumstances (1) 166:22 city (1) 28:25 civil (1) 149:2 claimant (1) 149:10 claimants (3) 1:6 59:5 115:11 claimed (1) 155:3 claiming (1) 153:1 claims (6) 129:13 151:4,5,7 153:24,25 clarify (2) 20:20 38:23 clear (12) 12:6 29:14 38:8 50:16 74:24 75:21 77:7 89:24 91:3 101:4 116:6 130:10 cleared (2) 131:11 132:1 clearer (1) 49:7 clearing (1) 130:12 clearly (4) 43:20 53:13 54:20 173:24 clerk (1) 91:24	click (3) 132:13,22,25 close (3) 2:2 7:14 185:3 closed (3) 10:11 167:24,25 closely (1) 23:21 closings (2) 184:13 185:8 clumsily (1) 131:22 cockup (1) 90:9 code (4) 97:4,5 121:25 128:17 codes (1) 59:4 coin (1) 172:24 coins (4) 173:4,8 174:6 180:13 colleague (1) 26:20 colleagues (3) 23:5,10 73:13 column (28) 33:3,5,10,17 34:5,7,10,17 40:18,23 41:4,5,6,13 59:15 91:16,17 95:5 96:23 141:6 155:11 168:19 172:22,25 173:11 175:14,14 180:3 columns (1) 122:11 combicounter (7) 3:8,9,11,14 10:6,7 60:15 come (43) 8:9,19 17:24 28:9 36:20 37:13 38:7 43:5 46:20 49:4 70:21 73:13,20,21 82:16 84:3 85:6,17 87:12 98:10 99:3 103:8,14,17 109:8 110:18 111:7 114:11 118:12,16 124:14 126:22 127:7 128:22 131:21 157:21 159:19 166:7,9 167:19 174:20 182:14,24 comes (12) 49:5 69:4 72:23 75:19 76:6,7,8 133:20 165:14 174:18 179:24 180:9 comically (1) 111:17 coming (11) 41:8 47:6 57:24 88:17 89:10 95:21 101:14 110:12 115:7 120:9 123:2 commence (1) 137:12 comment (6) 31:3 38:10,14 46:4 47:1 53:21 comments (2) 91:25 128:7 common (8) 7:5,7 8:6 82:2 132:17,18 139:1 149:10 commonly (2) 3:19 71:18 communicate (3) 71:4 72:20 76:10 communicated (1) 74:9 communication (2) 72:16 152:14 communications (1) 71:3 compensating (1) 155:4 complain (4) 3:22 54:1 93:8 111:22	complained (7) 54:3,4,5,7 55:15 89:7 110:22 complaining (2) 54:10 152:17 complaint (4) 32:3 143:25 144:17 155:12 complaints (1) 110:20 complete (9) 85:18 90:19 95:19 109:21 116:3 118:15,23 121:15 137:11 completed (11) 12:1 130:5 136:1 137:16 138:1 141:8,20 144:12 145:5 153:25 169:9 completely (5) 7:13,16 26:21 40:1 147:9 completeness (1) 116:6 computer (5) 53:16 89:19 120:8 152:21 156:20 concentrate (1) 55:9 concerned (5) 23:10 24:12 150:15 168:25 169:12 concerning (1) 67:21 concerns (1) 44:5 conclude (2) 106:3 181:1 conclusion (5) 86:21 93:7 106:6,8,12 conclusive (1) 120:7 conducted (1) 151:4 confident (9) 24:17 26:21 49:9,10 58:11 60:6 123:23 124:15 150:4 confine (1) 29:13 confirm (13) 4:5,21 6:2 13:5 25:24 26:3 30:23 47:15 55:14 65:9 66:21 87:5 93:15 confirmed (1) 67:19 confirming (1) 40:19 confuse (1) 50:3 confused (6) 50:7,9 78:11 116:20 117:18,19 confusing (2) 62:2 87:2 confusion (2) 107:25 117:18 connected (1) 182:18 connectivity (2) 137:2,7 considered (2) 101:13 152:8 consistent (3) 28:18 181:7,9 contact (4) 110:9 115:20 126:16 128:2 contacted (2) 92:10 127:11 contacting (4) 54:9 115:24 125:25 155:7 contained (1) 151:12 contemporaneous (1) 158:16 contend (1) 44:18 contents (1) 62:3 content (2) 2:1 91:16 contentious (1) 98:17 contents (3) 2:18 100:1 163:12	context (2) 22:8 112:25 continue (5) 45:19 59:12 70:14 85:10,13 continued (1) 178:22 contract (4) 27:10 53:13 69:1 129:8 contracts (1) 160:23 contradictory (1) 147:21 contrary (2) 148:1 151:12 control (1) 142:17 convenience (1) 3:15 convenient (2) 36:18 162:16 conversations (2) 8:11 155:2 convinced (4) 26:14,15,19 36:14 copies (2) 135:6,8 corner (1) 171:9 correct (99) 2:12,17,23 5:1,18,18 8:5,17 9:7,13 11:3 13:6,12 14:6,16,19,23 15:2,16,20,24 16:3,12,21 17:2,6 18:19,22,22 19:21,21 20:8,11,19,19 21:7,21,23,24 22:1,18,18 24:3,7,18 25:10 26:8,11 32:20 37:21 38:1 39:15,18 43:3,3 47:17 50:22,25,25 51:2,7,22 53:8 55:6 67:14 68:8,9 76:19 77:3,15,15 81:15 82:25 87:15,19,23 88:22 90:9 91:4 92:12 93:6,19 94:2 95:16 100:20 102:17 103:13,20 110:7,25 112:4,13 120:17 123:22 142:3 150:5 160:20 161:2 169:17 corrected (2) 80:16 93:5 correction (17) 21:19 43:11 66:20 67:15 76:13,18,24 77:2,10,21,23 82:25 87:24 88:4,23 90:20 142:8 corrections (5) 67:4 68:12 79:6 89:16 90:2 correctly (9) 15:25 18:25 22:25 34:1 105:1 143:9 147:5 159:22 173:14 corrects (1) 77:2 correspond (1) 63:5 corresponding (2) 56:21 65:25 costs (2) 151:14 152:2 couldnt (16) 17:11 30:15,19,24 31:13 107:5 111:14 117:22 123:25 124:19 132:15 144:21 161:10,13 167:18,22 council (1) 92:22 counsel (2) 2:21 149:6
---	---	---	---	--	---	--

count (1) 177:13  
 counted (4) 19:5 48:13  
 176:13 180:16  
 counter (31)  
 3:8,11,14,15,16,17,19  
 8:11 9:25 10:9  
 14:20,21 15:7,14  
 25:13,15,17 31:18  
 91:24 120:25 123:1  
 135:1 164:5,6,7,8,22  
 165:2,7,16 167:17  
 counters (5) 3:7,13  
 10:2 25:19 101:19  
 counting (6) 4:21 16:11  
 50:8 59:22 173:17  
 177:13  
 country (4) 57:23  
 69:14,23 72:25  
 couple (9) 32:24 59:11  
 64:2 97:21 111:1  
 122:11 124:25 161:25  
 175:11  
 course (12) 6:18 78:7  
 83:14 101:10,22  
 126:15 129:7 175:25  
 184:6 185:14,21,22  
 cover (1) 146:23  
 created (2) 87:21 95:13  
 credence (1) 127:5  
 credit (2) 78:3 161:16  
 criminal (2) 149:13  
 150:13  
 criticism (2) 9:9 82:20  
 cross (1) 129:15  
 crosses (1) 180:8  
 crossexamination (12)  
 2:24 37:8 59:10 83:18  
 84:6 100:25 163:16  
 181:25 182:17  
 187:6,11,15  
 crossexamined (3) 98:6  
 182:4 184:5  
 crossexamining (1)  
 162:11  
 crux (1) 31:4  
 currently (1) 94:3  
 cust (1) 155:12  
 custom (1) 95:13  
 customer (37) 8:9 69:4  
 91:18,23  
 92:9,11,11,19 95:19  
 110:9,14 121:11,14,25  
 122:22 123:2,3 126:24  
 128:18,20 129:5  
 134:23 135:8 136:2  
 137:8 139:22 140:7  
 142:2 155:13 157:21  
 158:4 159:11,16  
 160:9,14,16 167:19  
 customers (4) 41:8  
 109:25 121:3 142:2  
 cut (27) 102:3  
 107:21,23 108:9  
 109:20 110:6 112:19  
 113:12 114:1 115:1  
 116:22  
 117:2,4,5,7,13,20  
 118:10,13,14,19,20,22  
 119:1,13,15 167:10  
 cuts (1) 118:6  
 cwu (1) 129:11

d (7) 33:3,5 34:7  
 40:18,23 91:16 95:5  
 d13904 (1) 171:10  
 daily (2) 120:22 172:12  
 data (36) 28:14 29:10  
 38:7 46:2,24  
 56:17,18,23  
 57:4,6,8,12,14  
 58:8,21,23 60:24  
 61:5,11 65:22 66:3,4  
 69:6 87:2 114:20  
 122:2 132:5,9,10  
 141:24 169:12 170:7  
 171:5 174:9 176:24  
 179:10  
 date (24) 14:10 33:6  
 34:7 40:18 56:15  
 62:9,13 64:18 67:24  
 93:21 95:6,12,12,13  
 106:19 108:10,19  
 112:13 116:22 117:14  
 124:20 141:16 146:14  
 172:20  
 dated (2) 107:12,15  
 dates (8) 3:20,21 4:6  
 95:9 108:14 146:17  
 184:17,25  
 day (27) 7:6 8:2 43:14  
 60:21 70:15 73:8  
 75:14 84:25 85:1  
 104:4,5 110:2 113:12  
 127:1 129:18 141:5  
 144:19,20 165:22  
 166:11,12 171:3,20  
 174:14,20 176:16  
 185:5  
 day24015 (1) 94:24  
 days (14) 3:25  
 7:22,22,22 8:2 35:7,14  
 110:12 115:21 143:24  
 172:5,9 176:4 177:5  
 de (8) 184:7,12,20  
 185:1,2,11,15,21  
 deacock (3) 4:24  
 63:19,23  
 deal (10) 1:12,13 45:18  
 62:23,24 100:8 102:10  
 145:14 148:8 181:14  
 dealing (2) 16:8 65:10  
 dealt (5) 100:2,13,16  
 102:2 134:22  
 debate (1) 162:2  
 debit (2) 121:6,19  
 debitcredit (1) 135:21  
 december (4) 118:7  
 125:7 128:8 141:17  
 decided (1) 152:11  
 decision (1) 43:4  
 deck (2) 10:14,22  
 declaration (25)  
 16:5,8,10 17:19 19:3  
 47:11,15,25 48:5,9  
 51:10 65:8 92:8  
 171:12,13,25 172:5,12  
 173:13 175:13 176:17  
 180:2,8,8,15  
 declarations (7)  
 176:3,25 178:1,24  
 179:13,19,25  
 declare (2) 180:11,13  
 declaring (1) 173:16  
 dedicated (1) 10:14  
 default (1) 46:16

definitely (3) 56:1  
 108:10,13  
 definition (2) 46:16  
 65:4  
 delete (3) 140:25  
 180:4,20  
 deliveries (1) 164:13  
 demonstrate (2) 145:8  
 177:24  
 den (32) 11:5  
 56:8,14,22 57:9 60:23  
 65:21 78:25 79:19  
 80:8 81:21 82:4 83:7  
 84:9 86:1,22 87:3,14  
 88:11 100:9 102:14  
 106:15 107:12,17  
 116:9 118:9 125:9,18  
 133:25 146:2 147:14  
 169:3  
 denomination (2)  
 180:19,19  
 depending (1) 150:17  
 depends (3)  
 43:13,17,20  
 deposit (9) 91:19,22  
 92:5 120:13  
 121:4,16,19 122:1,17  
 deposited (1) 122:22  
 derived (6) 51:20  
 52:14,17 53:1,3,22  
 describe (9) 8:14 13:6  
 45:23 47:14 50:20  
 71:22 72:13 108:24  
 164:2  
 described (7) 20:4  
 46:18 51:24 52:24  
 55:18 66:7 79:20  
 describes (2) 79:22  
 136:19  
 describing (3) 14:12,13  
 51:19  
 description (3) 12:12  
 33:11 96:15  
 designed (1) 25:21  
 desk (6) 67:21 69:23,24  
 110:5 140:14 172:25  
 detail (7) 8:21 13:4  
 21:8,25 22:4 91:2  
 110:18  
 detailed (4) 45:7 48:24  
 118:18 181:17  
 details (2) 96:24 153:24  
 detective (1) 177:9  
 determine (3) 61:3  
 83:16 84:5  
 diagram (1) 137:5  
 didnt (66) 6:16 15:8,9  
 17:4 21:19,25 23:1  
 30:2,6 32:7,10,13 39:4  
 42:19 54:25 55:21  
 65:19 66:12 68:6 76:20  
 77:8,11,13,14,14,15,18,22,24  
 78:8 83:1 88:1 94:6  
 104:12,17,20  
 105:8,12,12  
 106:8,23,24 111:7,18  
 115:19,23 117:4  
 118:14 123:18 124:16  
 142:19 144:1,4,13,16  
 147:3 154:15 156:15  
 169:25 170:13 177:16  
 178:21 182:1 183:24  
 185:15

differ (1) 148:10  
 difference (8) 109:7,7,8  
 166:21 179:20  
 180:15,17,24  
 different (21) 28:20  
 38:12 39:7 60:9,12  
 67:4 71:20,22 72:7  
 84:24 88:25 98:12  
 114:19 117:25,25  
 127:25 137:18 139:2  
 165:11 179:7,8  
 differently (1) 134:22  
 difficult (2) 28:15 98:23  
 difficulties (1) 177:23  
 difficulty (1) 178:1  
 digits (1) 180:6  
 direction (2) 64:22 65:1  
 directly (3) 121:16  
 129:5 160:9  
 disagree (6) 34:12 60:2  
 78:16 82:16 117:10  
 130:20  
 disappeared (14) 15:22  
 16:1 19:12 26:17  
 27:17 32:5 39:6  
 49:8,13,14,22,24 52:3  
 177:14  
 disappointed (1) 28:5  
 disclosed (1) 46:25  
 disclosure (1) 123:10  
 disconnected (11)  
 128:16 135:3,6,25  
 136:14,17 138:4,10  
 142:1 159:7,9  
 disconnections (1)  
 134:21  
 discrepancy (26) 12:3  
 46:12,13,14,20,25  
 51:14 96:18 119:13  
 126:4 127:14,15,18  
 155:19 166:14,19  
 169:22 170:8  
 171:16,21,24  
 172:13,21 173:20  
 177:1,5  
 discuss (4) 76:5 94:4  
 182:17,23  
 discussed (8) 22:12 30:8  
 49:15 96:21 151:3,11  
 155:17 184:15  
 discussion (1) 151:1  
 dispute (2) 26:6 152:13  
 disputed (1) 54:8  
 disputes (2) 98:25 99:1  
 disputing (2) 53:11 97:6  
 distracted (1) 91:24  
 distress (1) 21:14  
 document (39) 2:10  
 4:22 11:9 44:6 57:10  
 58:18,24 59:7,20  
 60:11 64:8 95:10  
 77:9 111:18 115:5,11  
 117:12 132:7  
 136:14,19 137:1,5  
 138:13 139:1,5,7,9  
 141:15 147:22 156:9  
 157:10 163:4 172:4  
 176:23 178:5  
 179:6,7,8 183:19  
 documents (5) 57:14  
 65:13 101:4 105:16  
 146:18  
 does (21) 8:7,12 29:10

35:11 52:20 57:1,2  
 69:5 74:2 78:14 80:6  
 84:15 91:3 115:6  
 125:12 139:7 147:2  
 149:22 152:21 164:25  
 165:16  
 doesnt (17) 1:25 8:25  
 40:10 43:20 44:25  
 52:11 93:23,24 120:25  
 132:17 147:1,7  
 156:8,8 169:21 173:14  
 177:10  
 doing (15) 8:25 31:19  
 32:14 36:24 59:10  
 129:9 131:21 139:15  
 153:2 154:17,18  
 156:9,16 167:14  
 172:23  
 done (40) 6:15 19:8  
 20:3 21:11 22:23  
 23:10 24:2,21 25:14  
 26:14,16,21 27:1 43:7  
 47:14 48:6,7,11,11  
 51:15,16 52:9 53:10  
 57:1 69:13 73:3,4  
 81:19,22,23 86:17  
 87:5 88:12 98:20  
 140:6 155:25 177:14  
 180:11,12 181:25  
 dont (88) 1:17 12:8  
 17:15,19 21:8 28:7,11  
 32:18 35:20,21  
 36:1,11,12 37:3,9 38:5  
 39:22 43:13 44:11,13  
 47:2,3,4 49:21,23 50:2  
 53:19 54:4,6,13 57:18  
 59:22 63:18 70:17  
 73:23 75:12 77:9,17  
 78:21 79:9 81:3 83:9  
 88:18 96:1 97:19  
 98:13 112:18  
 114:14,17,23 115:4  
 116:6,22 117:14  
 118:19 120:2,3 127:5  
 131:23,23 132:8  
 138:12,23 143:22,25  
 144:5,6 145:1 146:20  
 150:3,15,20 162:10  
 169:2,4 170:16 172:3  
 176:18 177:15,15,19  
 180:10,20 181:14  
 182:13,23 183:5 184:1  
 doors (1) 10:11  
 double (3) 22:23 23:14  
 68:8  
 doublechecked (1)  
 48:14  
 doublesided (1) 138:19  
 down (30) 4:4,21 5:2  
 27:18 33:2 34:4 40:22  
 41:13 44:4 58:24  
 59:15 61:10,22 69:22  
 72:24 77:4 91:19 96:8  
 103:14,15 111:11  
 127:24 129:10 131:17  
 140:16 141:1  
 157:16,21 167:19  
 173:25  
 drafting (1) 117:23  
 draper (83) 2:5,6,24,25  
 12:5,10 15:11,13  
 23:12,21 29:19,20  
 35:15,23 36:3,5,18,20

37:18 44:21,23  
 45:2,7,11,17,20  
 50:11,14,17 55:11,12  
 57:3,5 59:9,14,19,22  
 60:3,22,23 61:22  
 62:3,8,10,16,18,21,25  
 63:2,15 64:14  
 72:11,12  
 74:4,10,16,17 75:2  
 78:14,15,17,18,22,25  
 79:7,11,14,17  
 83:8,14,19,22,24  
 84:4,8,22  
 85:15,17,24,25 94:24  
 184:8 187:6  
 drapers (3) 29:12,17  
 55:9  
 draw (2) 10:19 150:17  
 drawer (1) 47:20  
 draws (1) 86:22  
 drive (1) 94:10  
 drop (1) 135:2  
 dropping (1) 37:5  
 due (7) 126:24  
 128:18,20 155:12  
 157:21 159:11,16  
 duplicate (1) 96:3  
 duplicated (3) 71:9  
 77:4 90:6  
 duplicating (1) 82:5  
 during (11) 10:4 24:13  
 31:9 37:8 70:15  
 128:10 134:23 147:6  
 151:4 158:19 160:13

E

educated (1) 132:12  
 effect (4) 55:15 88:4  
 154:3,6  
 effecting (1) 131:8  
 effectively (3) 63:11  
 67:21 150:5  
 effort (2) 105:8,18  
 eight (3) 37:1,2,13  
 either (17) 1:21 2:3  
 12:6 32:16 38:18 39:2  
 60:2 78:3 114:2  
 134:15,22 135:16  
 144:6 145:4 150:5  
 173:16 182:24  
 electrical (1) 109:21  
 elements (1) 25:3  
 else (7) 24:21 98:3  
 164:10 178:20 181:3  
 183:4 185:23  
 elses (2) 32:22 74:13  
 email (2) 97:1 107:20  
 emergency (1) 174:23  
 emerges (1) 179:18  
 employee (1) 63:22  
 employees (1) 19:10  
 enable (8) 59:5 95:11  
 113:9 122:5 132:6  
 140:15 171:7 172:18  
 encouraging (1) 94:11  
 end (16) 28:23 29:2,6  
 35:20,21 36:12,13  
 59:13 80:2 98:7 110:2  
 135:24 148:24  
 166:11,12 171:12  
 ended (1) 124:25  
 engage (1) 91:2  
 enough (2) 99:1 101:4  
 enquiries (1) 100:10  
 ensured (1) 148:7  
 enter (1) 130:10  
 entered (2) 42:5 92:22  
 entire (2) 101:11 109:22  
 entirely (2) 28:7 89:24  
 entitled (2) 149:23  
 150:19  
 entrance (1) 25:18  
 entries (13) 59:21,25  
 60:4 61:10 62:21,24  
 103:9 111:23 112:12  
 156:13 169:10 178:8,9  
 entrusted (1) 7:18  
 entry (11) 4:17 40:19  
 45:16 95:7 103:15  
 153:9,10 156:20 174:2  
 180:14,20  
 envelope (1) 151:16  
 episode (1) 158:12  
 equipment (1) 37:4  
 error (31) 18:11 27:19  
 41:21 42:1,4 50:8  
 54:19,19,20 66:23  
 70:22 81:23 89:19  
 90:4,5,7 91:9 92:23  
 93:11,12 95:22 97:11  
 109:6,9 123:16,17  
 124:12 125:3 127:24  
 143:15 146:8  
 errors (7) 89:17 90:3  
 93:1,9,10,10,12  
 essentially (1) 152:7  
 et (2) 135:22 164:14  
 euros (2) 41:19,24  
 even (10) 8:2 27:1

53:16 74:11 110:9  
 123:25 145:20  
 147:16,24 176:7  
**evening (5)** 8:4 85:3,4  
 128:22 159:19  
**event (10)** 46:24 56:17  
 108:24 110:22 125:19  
 132:9,10 143:2 155:16  
 171:5  
**events (9)** 102:3  
 114:5,20 116:21  
 118:17 132:5 140:3  
 176:24 181:7  
**eventuality (1)** 146:23  
**ever (1)** 155:25  
**every (27)** 7:1 20:6  
 21:22 22:12 25:17  
 27:12 36:22 48:14  
 56:20 60:21 65:24  
 67:21 69:14,22 72:24  
 73:8 75:9,13,14,17  
 93:3 104:4,5 109:16  
 152:15 156:15 166:12  
**everybody (2)** 71:18  
 93:4  
**everyone (1)** 42:16  
**everyones (1)** 149:14  
**everything (21)** 14:14  
 22:22,24 24:22 25:14  
 26:14,15 27:1 30:23  
 48:15 73:17 75:4 93:8  
 101:12 120:9,11 124:4  
 125:21 130:6 142:25  
 180:16  
**everywhere (1)** 42:20  
**evidence (76)** 16:22  
 25:25 26:3 30:21  
 32:10 48:16,19 50:16  
 56:22 65:10,11 70:12  
 74:5,5,11 75:7 85:8,18  
 87:14 88:11,17,21  
 93:14 98:7 102:14  
 104:14 105:6,11,21,24  
 106:17,21,24 108:9  
 109:2,12,14,20 110:8  
 111:16 114:21,25  
 116:9,21 117:6 118:25  
 119:2,24 123:5,15,22  
 124:16 125:18 131:19  
 138:25  
 139:13,13,19,24 140:2  
 145:8 146:2,13  
 147:14,23 149:2 168:1  
 169:4 170:11 174:15  
 177:21,21 180:25  
 182:18,24 183:4  
**exactly (7)** 4:21 18:10  
 28:20 75:2 109:25  
 110:2 124:7  
**examinationinchief (6)**  
 2:8 99:16 163:1  
 187:5,10,14  
**example (12)** 5:22 9:24  
 26:6 43:11 45:4,15  
 69:4 121:4 125:24  
 152:25 158:13 166:15  
**examples (1)** 32:24  
**excel (2)** 57:15 58:20  
**except (1)** 73:8  
**exercise (2)** 64:13 166:4  
**existed (1)** 104:12  
**existing (1)** 95:20  
**expand (1)** 133:1

**expect (6)** 28:11  
 114:2,21 133:18  
 160:21 171:2  
**expected (2)** 7:8 175:22  
**expecting (1)** 132:7  
**expects (1)** 166:15  
**experience (9)** 31:19  
 37:4 42:15  
 43:12,15,15 49:6 91:6  
 181:1  
**experienced (12)** 17:25  
 18:6,13 19:23,24 27:3  
 31:18,25 32:11,14  
 49:2 145:17  
**experiencing (1)** 152:8  
**expire (1)** 72:22  
**explain (20)** 3:10 8:18  
 13:25 38:2 44:12  
 58:18 62:22 76:25  
 78:10,11 89:23 94:16  
 106:3 117:3,16,22  
 124:9 126:17 148:24  
 155:22  
**explaining (9)** 48:24  
 72:19 90:3 93:9  
 127:15,22 148:5  
 170:16 179:21  
**explains (3)** 50:19  
 80:18 142:5  
**explains (1)** 137:6  
**explanation (9)** 19:17  
 91:5 98:23 124:11  
 128:1 142:22 176:12  
 181:4,6  
**explore (1)** 144:7  
**explored (1)** 98:18  
**exploring (3)** 9:1 50:15  
 127:7  
**express (1)** 12:7  
**external (1)** 25:20  
**extra (2)** 43:2 76:21  
**extracts (1)** 103:5  
**extremely (2)** 49:9  
 58:24  
**eye (1)** 59:15

---

**F**

---

**f103811 (1)** 4:2  
**f12521 (1)** 156:5  
**f12571 (4)** 103:4 128:8  
 129:23 158:9  
**f125716 (1)** 112:10  
**f12574 (2)** 113:8 122:3  
**f12575 (1)** 114:20  
**f12576 (1)** 111:24  
**f12621 (1)** 113:3  
**f12861 (2)** 140:15 155:9  
**f13531 (1)** 58:17  
**f1365 (2)** 134:19 157:9  
**f13651 (2)** 61:5 136:12  
**f13652 (1)** 136:5  
**f13653 (1)** 137:2  
**f13741 (1)** 154:24  
**f13991 (1)** 153:13  
**f1399114 (1)** 153:19  
**f14311 (1)** 148:17  
**f143112 (1)** 150:25  
**f14381 (1)** 174:9  
**f14821 (2)** 179:5,8  
**f15071 (2)** 171:6 176:22  
**f15141 (1)** 175:6  
**f15221 (1)** 172:17  
**f17171 (1)** 115:10

**f171714 (1)** 115:17  
**f171715 (1)** 116:12  
**f18291 (4)** 33:1 40:16  
 91:13 95:11  
**f18342 (1)** 173:22  
**f18343 (2)** 168:2 178:6  
**f18486 (1)** 147:11  
**f3221 (1)** 184:1  
**f8691 (3)** 132:5,13,20  
**f870 (1)** 141:14  
**f8702 (1)** 141:15  
**f8711 (2)** 132:8 142:7  
**facebook (1)** 158:9  
**faced (1)** 104:8  
**facility (1)** 121:6  
**fad (2)** 97:4,5  
**failed (18)** 20:16 30:22  
 35:16 39:25 40:7  
 45:23 47:18 50:20  
 66:7 83:5 94:2 135:10  
 138:4 141:9,23,25  
 143:20 158:22  
**failing (2)** 48:17 109:10  
**failure (14)** 18:20 40:3  
 109:21 116:2 119:14  
 128:10 129:1 136:19  
 137:9,10 141:7 158:19  
 160:2,14  
**fair (9)** 7:18 21:17  
 31:22 82:22 92:25  
 124:18 134:8 139:18  
 180:1  
**fairly (3)** 42:14 109:14  
 177:20  
**far (8)** 5:2 14:13 113:11  
 123:10 168:25 169:12  
 175:1 181:6  
**father (1)** 21:13  
**fault (7)** 9:14 71:12  
 105:2,3 108:1 126:11  
 143:14  
**faulty (1)** 77:9  
**february (4)** 57:23 58:7  
 107:16 148:17  
**feel (5)** 36:2 91:25  
 103:16 105:12 160:11  
**feet (1)** 110:24  
**felt (4)** 126:11 128:1  
 155:19 160:21  
**fensome (4)** 4:18,22  
 61:16 62:12  
**few (17)** 57:17 68:5  
 76:16 102:13 107:9  
 110:12 115:21 128:4  
 143:24 145:13 161:7  
 166:20,20,22,23 177:2  
 183:12  
**fiddly (2)** 174:8 177:9  
**figure (29)** 16:18 17:1  
 30:19 51:11,20  
 52:8,14,17,17  
 53:1,3,22 65:5 76:21  
 77:15,16,20 78:6  
 81:8,9,20 83:1 84:15  
 88:19 89:4 122:13  
 180:5,21,22  
**figures (2)** 16:19 30:15  
**file (5)** 14:2 105:20,21  
 108:15 117:24  
**fill (2)** 60:15 115:12  
**filled (1)** 117:24  
**filter (5)** 61:6 95:12,12  
 171:8 174:10

**filtered (6)** 58:25  
 59:4,14 111:13,15  
 174:9  
**final (3)** 90:21 156:5  
 176:21  
**finally (1)** 148:11  
**financial (5)** 8:9  
 153:3,6,8 156:2  
**find (15)** 23:21 36:16  
 46:14 94:21 105:9,18  
 126:25 127:3,4 144:21  
 146:2 161:7,14,20  
 162:16  
**finding (5)** 32:1 39:21  
 48:17,25 107:7  
**fine (7)** 120:12 122:2  
 124:4 170:17 173:19  
 175:12 182:6  
**finish (3)** 64:13 85:7,10  
**finished (3)** 22:11 83:11  
 84:1  
**finishing (1)** 162:8  
**first (56)** 3:1 4:8,10,17  
 8:21 9:17 13:8 15:7,14  
 16:8 25:4,7 32:12  
 40:19 46:1 56:24 57:3  
 61:7 62:23 67:11  
 73:4,5,12 75:14 76:9  
 79:20 95:6 96:14  
 101:7 102:12,14  
 104:11,18,19  
 106:13,20,25 107:17  
 108:3,3,5,25 109:17  
 111:1 118:25 119:17  
 120:15 125:8 136:9  
 141:15 143:15 145:24  
 154:1,3 166:1 170:25  
**firstly (2)** 3:4 11:21  
**five (5)** 7:22 85:12  
 153:17 162:14 182:8  
**fix (1)** 79:4  
**flip (4)** 10:19,21,22  
 113:1  
**floating (1)** 165:7  
**flowchart (3)** 136:6,8,21  
**flow (1)** 78:5  
**focused (2)** 25:13 29:18  
**folder (2)** 163:2,3  
**follow (22)** 8:23 18:21  
 29:24 41:2 53:4 64:22  
 65:5,16,17 66:1 77:17  
 80:13,20 81:3,18 88:2  
 91:4 136:12 137:15,25  
 138:8 143:20  
**followed (14)** 11:21  
 19:9 22:25 23:7  
 24:16,18 27:3 92:12  
 100:10 134:13 139:6  
 140:12 143:2,7  
**following (12)** 46:6 69:7  
 116:11 121:14 127:1  
 129:18 137:13 141:5  
 144:20 169:17 174:13  
 176:4  
**footage (8)** 22:6,19  
 25:4,23,24 26:2,10,19  
**forefront (1)** 149:14  
**forgive (9)** 9:14 15:13  
 23:3,21 24:24 42:3  
 57:11 74:10 83:19  
**forgotten (1)** 176:15  
**form (5)** 1:25 71:1  
 78:15 150:3 154:11

**formal (1)** 150:10  
**formally (2)** 91:3 152:13  
**formats (1)** 117:25  
**forth (6)** 103:19 112:18  
 129:6 141:10 151:19  
 164:11  
**fortunate (1)** 28:1  
**forum (17)** 102:15  
 103:1,2,5,21  
 106:2,6,11  
 107:10,11,18  
 111:22,23 112:2  
 125:22 126:20 128:7  
**forward (3)** 80:7 105:10  
 106:17  
**forwards (2)** 113:1  
 123:1  
**found (4)** 152:16  
 166:19 167:22 176:16  
**four (16)** 61:10,23  
 62:19,21 65:23 94:10  
 98:13 109:1,7,8  
 110:17 123:25 124:21  
 138:20 149:22 164:20  
**fraser (167)**  
 1:8,12,17,20,24 2:6  
 12:5 15:11 23:12,16  
 29:11,16 35:5,25  
 36:4,19,21 37:7,12  
 44:21,24 45:4,9,13,18  
 50:11,15 54:23  
 55:3,5,7 56:24 57:3  
 59:7,12,18,24  
 60:9,14,18,20,22  
 61:20,23  
 62:7,9,15,17,19,23  
 63:1,13 64:13 71:20  
 72:1,3,5,9,11  
 74:4,15,18  
 78:13,21,24  
 79:4,6,9,15  
 83:8,17,20,23,25  
 84:7,20,23  
 85:3,5,11,20,24  
 94:8,11,13,17,22 96:5  
 97:20,21 98:1,5,10  
 99:6,9 115:4,8 119:12  
 122:11 129:22  
 130:19,22,25 131:3  
 132:9,11,17,22 133:3  
 136:8,11,16,25 137:18  
 138:25 144:8,10,13  
 148:18,23  
 149:9,19,22,25  
 150:2,22 153:14,18  
 157:5,7 161:23  
 162:8,11,14,24  
 168:3,6,8,14 172:7  
 176:23 179:6  
 181:16,22  
 182:1,7,10,16,21  
 183:2,4,8,10,17,21,25  
 184:4,7,17,23,25  
 185:5,7,13,17,22  
 187:8  
**free (1)** 162:4  
**freezes (2)** 134:21  
 136:18  
**frequent (1)** 5:23  
**frequently (1)** 7:20  
**friends (1)** 184:20  
**front (12)** 1:25 2:9 13:1  
 29:6 35:20 36:12,13

43:24 57:10 63:18  
 99:18 163:2  
**frustrating (2)** 124:10  
 129:20  
**fujitsu (2)** 161:17,18  
**full (6)** 32:16 58:23  
 101:15 132:23 151:17  
 168:19  
**fully (2)** 7:3 104:21  
**function (6)** 11:23 13:9  
 31:11 63:7 151:25  
 152:21  
**functions (2)** 28:14 32:2  
**fund (1)** 121:6  
**funders (7)** 21:25  
 105:14 128:1 151:8  
 156:8 157:3 161:22  
**future (2)** 150:13 155:6

---

**G**

---

**game (1)** 97:7  
**games (1)** 96:17  
**gap (1)** 133:14  
**garr (8)** 184:7,12,20  
 185:1,2,11,15,21  
**gave (5)** 50:1 54:24  
 139:14,22 153:24  
**general (2)** 90:23 107:3  
**generally (7)** 6:13 54:16  
 101:23,24 103:24  
 112:5 127:19  
**generated (1)** 146:16  
**generates (1)** 145:8  
**gentleman (1)** 85:14  
**gentlemen (1)** 182:2  
**genuine (1)** 99:1  
**genuinely (1)** 53:21  
**get (27)** 14:6 35:10  
 37:2 43:14,17,18  
 59:19 73:21 78:3,3,19  
 85:10 89:18 91:15  
 103:15 107:4,9,19  
 112:2 123:25 124:24  
 138:9 144:13 159:11  
 161:4,16 170:13  
**gets (4)** 75:10,14,18  
 79:8  
**getting (3)** 60:10 78:11  
 134:4  
**gifts (1)** 101:18  
**give (26)** 3:4 5:20 7:20  
 13:4 18:5 22:7 29:24  
 45:7 48:16 62:23  
 105:6 108:9 112:6  
 115:12 118:25 119:24  
 139:24 147:3  
 148:20,23 149:16  
 150:10 183:17 184:17  
 185:18,19  
**given (20)** 4:7 7:6 33:18  
 34:18 52:15 54:15  
 62:6,25 63:1 102:1  
 123:10 140:7,18  
 149:11 150:1,14  
 160:25 169:22 174:15  
 185:7  
**gives (3)** 40:18 95:6  
 111:17  
**giving (1)** 98:6  
**glitch (14)** 26:16 36:16  
 38:19 51:17 53:16,23  
 54:10,13 55:16,18,25  
 60:7 65:18 70:22

**glitches (2)** 19:14 93:5  
**godeseth (2)** 184:2,4  
**goes (9)** 24:10 36:10  
 39:9,10 43:4 45:5  
 72:24 82:10 130:10  
**going (91)** 1:21  
 8:13,18,19,21 11:9  
 12:5 13:3,5 15:3,5  
 16:15 21:13 22:7  
 24:11,24 28:8  
 29:11,17,22 31:21  
 32:24 34:17 35:25  
 36:24 37:1 47:4 56:6  
 58:3,8,9 59:18 61:10  
 66:19 70:24  
 79:11,12,13  
 85:2,7,11,13,17  
 88:15,16 90:20  
 94:9,10,15 96:5,6,6  
 98:10,11,15,21,22  
 99:14 101:15 105:13  
 110:18 112:2 119:14  
 120:8 122:25 123:1  
 124:5,6 130:19 140:17  
 144:25 149:4 153:18  
 155:13 160:19  
 162:5,22 168:12  
 169:3,6 176:24 181:16  
 182:3,4,13,21 184:12  
 185:7,8,10,19  
**gone (20)** 19:17 20:17  
 24:9 31:12 32:9 36:14  
 38:11 39:6 48:4 51:12  
 52:9,12 55:8 81:23  
 83:2,3 87:10 143:6  
 177:6 181:11  
**good (14)** 1:20 32:16,22  
 43:18,19 44:1,1 97:2  
 101:1,2 152:15 158:12  
 163:17,18  
**government (1)** 120:21  
**grateful (5)** 1:14 100:24  
 112:9 150:23 163:15  
**great (2)** 101:7 181:14  
**green (51)** 1:3,9,14,19  
 2:7,8,9  
 94:9,12,15,18,19,24  
 96:6 99:5,8,14,16,17  
 112:8 132:13 140:20  
 149:25 150:1  
 157:3,5,6,8,9 161:22  
 162:7,22 163:1,2  
 183:6,9,13,15,19,22  
 184:1,6,15,19,24  
 185:6  
 187:5,7,10,12,14  
**grievances (1)** 152:16  
**ground (1)** 82:2  
**group (3)** 102:16  
 106:2,11  
**grouped (1)** 62:1  
**guess (1)** 132:12  
**guide (2)** 134:19 138:17  
**guilds (1)** 28:25  
**guy (1)** 28:25  
**guys (1)** 27:21

---

**H**

---

**h (2)** 168:19 178:8  
**hadnt (13)** 23:1,3,10  
 48:13 105:24  
 130:4,5,12 137:20

140:21,22 154:17  
176:13  
**half (2)** 132:23 162:15  
**halfway (1)** 157:16  
**hand (6)** 129:17 140:25  
147:13,19 159:13  
183:18  
**handed (3)** 88:15  
122:21 169:14  
**handling (1)** 10:17  
**hands (1)** 141:22  
**handwritten (3)** 108:16  
118:1 146:17  
**happen (13)** 7:24  
8:7,8,12 42:20 43:8  
44:16 48:3 66:12  
124:16 131:20 159:5  
162:1  
**happened (59)**  
8:7,20,22 10:4  
19:11,22,25 20:3  
24:7,23 25:7 28:21  
31:1,1 35:15 36:7,17  
40:3 42:18 48:8 52:22  
53:5 54:14 66:9  
68:1,11 81:16 84:13  
87:4 88:19 89:22  
90:14 91:21 93:21  
94:5 97:17 98:2  
103:19 110:24  
111:2,5,5 120:14  
122:21 123:24 129:24  
131:23,24 142:5,25  
143:15 145:24 155:3  
156:1 158:16 159:3  
169:24 171:19 180:5  
**happening (2)** 61:25  
130:22  
**happens (13)** 13:19  
29:3,17 35:20 38:20  
54:16 72:23 73:7  
75:13 126:23 166:17  
180:21 182:12  
**happy (4)** 17:23 28:12  
153:16 160:18  
**hard (3)** 7:16 23:24  
89:18  
**harder (1)** 182:22  
**hardware (1)** 136:18  
**hasnt (3)** 87:9,12 142:4  
**havent (18)** 1:17 26:9  
44:15 54:4,7,15  
57:16,19 71:17 75:22  
87:12 89:9 115:15  
123:4,10 124:17 150:5  
180:11  
**having (12)** 36:21 47:14  
51:21 98:24 100:9  
107:8 138:12,18  
142:25 145:5 167:20  
183:22  
**head (2)** 56:11 79:3  
**heading (1)** 66:22  
**hear (4)** 15:9 21:15,17  
39:22  
**heard (1)** 67:1  
**hearing (1)** 162:2  
**helen (6)** 4:8,15 6:4  
7:2,11 23:6  
**hello (1)** 2:25  
**help (20)** 22:19 25:24  
26:3,6 31:11 32:1  
35:10,18 67:21

69:23,24 85:9 103:18  
110:5 124:3 140:14  
146:8 151:18 152:18  
172:25  
**helped (3)** 36:6 146:14  
156:24  
**helpful (1)** 12:24  
**helpfully (1)** 112:11  
**helping (4)** 43:10  
**helping (1)** 10:17  
**helpline (42)** 27:7  
31:10,25  
32:8,16,19,20,20,25  
33:24 35:10  
39:19,20,21,24  
40:13,14 42:7 55:24  
56:1,3,5 70:20 87:11  
89:8,12 90:17 115:20  
125:25 127:4,11 128:2  
129:3 144:23 160:7  
167:22 170:11,14  
172:16 173:7,15  
181:19  
**henderson (59)** 100:25  
101:1 112:9 115:7,9  
119:14 122:12 129:24  
130:21 131:4  
132:10,15,20  
133:2,4,17  
136:10,15,22 137:1,20  
139:4 140:21  
144:9,10,12,16,24  
148:22,23  
149:18,20,24  
150:9,18,23 153:16,19  
162:10,12,13  
163:16,17  
168:4,11,12,15 172:8  
176:24 179:8  
181:14,20,22,24  
182:6,9 184:8  
187:11,15  
**here (20)** 4:17 5:6 35:3  
57:12 58:16 60:4 64:3  
83:25 108:21 114:14  
116:21 118:4 122:13  
123:15 133:5 136:23  
145:23 151:1 177:11  
185:3  
**hes (2)** 74:7 94:9  
**high (2)** 101:14 164:12  
**higher (4)** 6:2 136:9  
171:24 176:4  
**highlight (2)** 61:9 168:5  
**highlighted (2)** 168:15  
175:7  
**highlighting (2)** 174:12  
175:7  
**hindsight (2)** 20:21 49:7  
**history (1)** 107:20  
**hit (2)** 43:16 92:5  
**hol (6)** 128:10,11 129:1  
158:19 160:2,13  
**hold (6)** 8:10 28:22  
54:23 61:20 67:16  
183:8  
**holding (2)** 38:6 89:22  
**holds (1)** 38:5  
**holiday (1)** 64:9  
**holidays (1)** 7:9  
**home (3)** 94:10 164:12  
173:5  
**honest (4)** 7:16 40:2

59:19 96:1  
**honour (4)** 78:12  
85:2,4,9  
**hop (1)** 165:10  
**hope (3)** 56:6 140:16  
177:20  
**hopefully (2)** 1:16 101:3  
**horizon (92)** 5:4 6:13  
11:23 15:22  
16:17,25,25 17:1  
18:4,15 19:13,14  
20:23 21:2 28:20  
29:21 30:1,5,14,19,22  
31:11 35:18 36:5 39:9  
42:5 51:11,20  
52:8,14,17 53:1,3  
67:7,9,21 71:5 74:1  
76:21 77:17,20 78:6  
81:13 84:15 89:20  
90:4,24 91:22 92:1  
93:11 105:2 119:14  
128:11,14 129:18  
130:4,17 133:20  
134:18,21,22 137:6  
138:9 139:11 141:7  
143:3,5,14 145:4  
146:16,22,25 147:7  
148:4 151:13,14,17,25  
152:24 158:13,21  
159:1,22 160:5 166:15  
167:9,11 169:16  
177:22 181:1,2,8  
**hour (2)** 94:10 167:13  
**hourhour (1)** 36:22  
**hours (11)** 3:12,17,19  
5:21,24 7:25,25  
10:4,20 94:14 185:20  
**housekeeping (2)**  
183:14 187:16  
**however (5)** 27:6 29:9  
55:23 93:5 139:4  
**human (9)** 42:16 89:17  
90:3,5,7 93:4,9,12  
127:24  
**hurried (1)** 36:2  
**hypothetical (1)** 16:19

---

**I**

**icon (2)** 21:2 151:13  
**id (7)** 5:7,8,11 37:25  
61:15,16 95:21  
**idea (1)** 111:5  
**ideal (1)** 182:13  
**identical (3)** 128:15  
159:1,3  
**identified (3)** 30:10  
51:25 95:18  
**identify (9)** 17:20 33:25  
34:1 43:21 46:11,21  
56:15 61:23 65:1  
**identifying (2)** 13:9  
145:11  
**identity (1)** 101:12  
**idmla001 (1)** 64:5  
**ids (1)** 5:4  
**ill (1)** 23:21  
**im (165)** 1:14,19 4:13  
8:11,13,18,18,21,25  
9:1,2 13:3,4 15:3,5,9  
16:14 17:22,25 18:6  
21:10,15,17 22:7  
23:14 24:7,11,15,24  
26:15 28:1,4,6,8,11,24

29:11,22 31:14,21  
32:7,9,13,13,24 35:12  
36:14,16 38:12,18,21  
40:1,19 42:8 44:13,24  
45:2 49:2,9 50:7  
52:19 53:5 56:2,6  
58:1,8,9,15 59:18 60:6  
65:5,10,17,20 66:19  
71:12 72:8 74:3  
75:17,20 76:4 78:14  
79:23 80:9 81:17  
82:25 89:4,13,24  
90:20  
94:9,10,11,13,16  
98:21 99:14 100:24  
105:8 106:12 109:12  
110:18 112:1,9 114:22  
117:6,15  
118:4,4,19,19,22,24  
119:9,10 122:4  
123:10,23 125:2  
126:14  
127:7,9,13,18,23  
130:13  
131:4,12,14,21,22  
132:20 134:4  
137:20,22 139:23  
140:17,22 144:5  
146:15,15 149:4  
150:4,23 152:23  
153:16 156:13 161:24  
166:18 170:1  
174:16,24 176:11  
177:20,23 179:18,23  
180:10 181:5 182:3  
183:9 184:7,9 185:8  
**imagine (3)** 98:18 112:5  
127:20  
**immediately (8)** 14:24  
15:4 16:4 30:4 47:8  
50:19 70:2 122:17  
**importance (2)** 4:11  
107:6  
**important (11)** 21:8,25  
23:23 25:25 26:3  
70:17 105:5,14 107:6  
162:1 174:6  
**impression (1)** 111:16  
**improve (1)** 153:8  
**improved (2)** 153:3,6  
**inappropriate (1)** 151:3  
**inaudible (23)** 5:24 9:16  
10:16 18:17 19:10  
23:23 24:19 27:24  
36:15 38:6,18 39:1  
47:9 48:8 53:10 67:20  
68:10,11 80:16 82:8  
83:4 90:16 92:17  
**inbetween (5)** 31:1,2  
36:9,15 114:7  
**incident (12)** 68:10  
91:23 94:5 108:18,21  
116:8 117:1,21 120:11  
142:16 151:21 177:16  
**incidents (2)** 117:13  
119:7  
**includes (2)** 25:17 74:22  
**including (5)** 4:1 106:18  
115:11 135:21 141:20  
**inconsistent (1)** 88:21  
**incorrectly (1)** 19:8  
**increase (1)** 168:10  
**increased (2)** 51:21

53:23  
**incredibly (2)** 15:11  
79:12  
**incriminate (1)** 150:12  
**incurred (3)** 115:19  
151:15 152:2  
**independent (3)** 88:12  
89:21 90:13  
**index (1)** 187:2  
**india (1)** 58:2  
**indicate (2)** 11:12 86:12  
**indication (3)** 3:4 5:20  
7:21  
**indications (3)**  
114:8,12,14  
**indicative (1)** 94:16  
**individual (1)** 103:9  
**inexperienced (1)** 32:17  
**inform (1)** 42:20  
**information (25)** 29:21  
30:1 35:17 36:5  
67:7,8,17 68:21 69:22  
71:9 74:1,8 90:6,7  
103:3 105:12,22  
106:14 107:7 108:6  
112:6 115:3,10 116:8  
118:2  
**informing (2)** 43:10  
156:19  
**infrequent (1)** 7:24  
**initial (7)** 68:2,10 87:16  
105:13 106:13,20  
146:10  
**initially (1)** 185:8  
**input (1)** 121:25  
**ins (2)** 169:25 170:1  
**inside (1)** 47:4  
**insofar (1)** 184:13  
**installed (1)** 69:15  
**instance (3)** 27:16  
54:14 121:23  
**instances (2)** 27:17  
54:15  
**instead (1)** 92:3  
**instigated (1)** 145:3  
**institution (1)** 121:7  
**instructions (5)**  
137:15,25 148:2  
151:12,17  
**insurance (2)** 41:17  
44:8  
**intending (1)** 181:24  
**intention (4)**  
83:14,23,25 84:4  
**interaction (1)** 10:3  
**interested (1)** 166:18  
**interface (1)** 29:6  
**internal (4)** 25:20 52:2  
71:2 156:6  
**internally (1)** 47:3  
**internet (1)** 57:25  
**interrogate (1)** 28:15  
**interrupt (1)** 182:1  
**interrupted (1)** 169:9  
**interview (4)** 148:15  
153:12 155:17 156:17  
**interviewed (1)** 148:14  
**into (32)** 13:8 15:7,14  
26:17 38:21 39:4  
47:20 52:3 53:7  
62:1,15 80:17 81:8  
83:2 90:15 92:4,6,13  
107:8,9,20 110:12

113:13 121:4,17  
122:18 124:14 132:23  
140:24 148:4 152:11  
185:22  
**introducing (1)** 18:3  
**inverse (1)** 63:11  
**investigate (5)** 31:12  
35:18 120:10 144:21  
166:25  
**investigated (8)**  
88:16,16 110:8,22  
124:2 143:12  
148:11,13  
**investigating (2)** 32:9  
49:1  
**invoice (1)** 78:3  
**involve (1)** 89:19  
**involved (6)** 16:10 18:3  
20:5 90:4 93:11 157:1  
**involving (2)** 71:15  
161:10  
**irate (3)** 129:3 160:7,18  
**ireland (1)** 121:1  
**irrespective (1)** 75:18  
**islamabad (1)** 1:5  
**isnt (48)** 8:16 12:12,22  
13:21,23 14:3 15:23  
17:3 20:7 22:17 23:12  
26:9 30:11 34:2  
35:2,19 39:11 41:11  
42:14 46:9 47:16,24  
50:12 51:6,21,24  
52:10 79:4 80:5 88:23  
92:25 93:18 104:15  
105:5 109:6 122:20  
134:13 135:17 136:9  
143:5 147:8,21 152:3  
156:15 169:16 171:25  
176:19 179:21  
**issued (1)** 121:19  
**issues (5)** 104:8 139:1  
145:15 149:10 152:8  
**issuing (1)** 43:11  
**item (2)** 11:21 71:21  
**items (1)** 149:23  
**its (81)** 5:12 7:7  
10:14,14 13:18,18,21  
14:3 21:1,1 22:2 28:24  
29:4 32:20,21 36:9  
38:18 40:14 42:3  
43:6,16 44:2 45:14  
46:8,9 51:16,22 53:25  
54:17,18,19 58:19,20  
59:19 60:7,7 69:3  
71:18,18,24,24  
72:1,2,18,18,21 73:4  
77:13,14 88:7,16,24  
89:5,24 92:25 109:6  
110:21 114:24  
122:9,20,24 125:3  
127:21,22 130:8,9  
140:2 143:17 152:21  
153:9 156:14 162:17  
164:4 166:13 167:20  
174:8 176:19  
177:9,9,12 182:13  
**itself (2)** 81:2 115:22  
**ive (4)** 25:16,20 37:4  
103:17

---

**J**

**jando (3)** 54:5 55:4 98:2  
**jane (4)** 87:8 88:13  
97:24 98:1

**january (11)** 3:21 34:8  
66:20 67:13,19  
68:11,24 69:25 80:11  
96:9 98:20  
**jay (1)** 153:20  
**jayesh (2)** 99:15 187:9  
**jaytank23 (1)** 103:11  
**jigsaw (1)** 176:21  
**july (18)** 3:20 8:16  
10:25 38:4,10,14 40:4  
44:10 45:4,12,15  
54:9 56:15,16,19  
58:12 60:25 62:13  
63:23 64:18,21,25  
**June (20)** 40:18,19 41:1  
44:10 45:4,12,15  
46:3,24 56:16,19  
58:9,12,13 60:1,5,11  
95:6,7,15

---

**K**

**kashmir (2)** 58:1,6  
**kb (1)** 153:20  
**keep (7)** 22:5 54:18  
85:7 113:15 122:7  
140:16 153:18  
**keeping (1)** 113:18  
**keith (2)** 153:21,22  
**kept (14)**  
10:10,13,18,19,22  
17:17 22:4 97:15,15  
105:19 135:9,9 143:10  
154:11  
**key (2)** 15:18 57:19  
**kind (4)** 28:4 42:23  
44:19 93:1  
**kindly (3)** 1:5 96:8  
163:3  
**kinds (1)** 46:11  
**knew (10)** 16:23 23:1  
27:1 31:19 32:11  
104:12 116:1 149:16  
156:18,20  
**know (66)** 6:23 7:7 12:7  
18:14 22:3 23:6  
26:17,25 27:12,19  
28:2,25 30:2,6,23  
32:14,18 35:12,20  
38:5,20,22 43:24  
44:13 47:2,3,4,4 49:9  
50:3 54:4,6,13 55:22  
57:18 76:7,9 83:9  
84:23 88:18 89:6,6  
97:19 126:23  
127:15,17 138:23  
143:22 144:4,4,6  
145:1 154:2 164:16  
165:9 169:2 170:24  
172:3 175:18 176:18  
177:15,19 178:4  
184:1,9 185:17  
**knowledge (5)** 43:25  
75:8 103:3 108:7  
116:3  
**known (4)** 3:19 19:2  
141:11 152:5  
**knows (1)** 38:20  
**kumar (1)** 163:4

---

**L**

**l (3)** 41:6 59:15 95:17  
**laa001 (1)** 64:4

**label (12)** 102:8  
145:14,20 146:25  
147:5,13,13,16,19,24  
155:5,24  
**labels (4)** 145:18  
147:10 169:7,14  
**labouring (2)** 31:3  
75:13  
**lady (2)** 97:24 161:6  
**largely (1)** 44:23  
**last (7)** 40:24 50:12  
75:9 93:15,18 137:11  
150:3  
**late (3)** 8:4 22:1 57:25  
**later (14)** 8:19 36:1  
45:5 76:13 107:16  
109:2 110:17 143:24  
144:7 167:22 172:5,9  
177:5 185:7  
**latif (141)**  
1:4,12,13,15,20,23  
2:9,11,25 3:9 4:3 8:6  
9:9 11:6 12:11,22 15:7  
16:4 18:13 19:2,18  
20:5 21:4,9,15,17  
23:16 28:6 29:11,20  
31:9 32:25 33:3,18  
34:7 35:15 36:21  
37:18 38:12,23  
39:7,20 40:17,20,25  
41:5 42:15,24 43:20  
44:3,17 45:19,21 46:1  
47:11,13,24 48:16,20  
49:13 50:18 51:18  
52:5,6,21,23 53:12,19  
54:23 57:5,18  
58:5,9,15,18 59:14  
60:4,11,23 61:7,11,17  
62:22 63:8,15,19  
64:3,6,15,24 65:10  
66:6,11,14,19 68:4,21  
69:24 70:17  
71:1,14,20 72:12  
74:11 75:22 76:12  
77:17 78:18 79:2,17  
80:2 81:16,25 82:20  
83:15 84:4,8,23 85:25  
86:9,17,21 87:1,14  
88:21 89:14,24 90:23  
91:8,14,21 92:14,25  
93:7,15,24 94:7,20  
96:11 97:18 187:4  
**launch (1)** 96:16  
**lawrence (4)** 87:8 88:13  
97:24 98:1  
**lead (1)** 93:2  
**leads (1)** 181:1  
**learned (4)** 69:25 112:9  
184:15,20  
**least (5)** 25:24 60:21  
87:15 107:25 157:16  
**leave (4)** 90:20 157:10  
161:25 183:11  
**led (6)** 89:17 102:3  
108:18 116:22  
117:8,14  
**ledger (2)** 153:9,10  
**left (7)** 34:5 92:2  
107:10 122:11 140:25  
152:20 154:10  
**lefthand (2)** 113:14  
171:9  
**length (1)** 111:10

**less (4)** 5:23 125:25  
127:23 175:24  
**let (11)** 49:12 52:5 79:9  
108:1 126:10 127:25  
148:18,24 183:8,10  
184:8  
**lets (25)** 45:9 85:16  
96:14 107:21  
119:10,17 120:14  
122:2 125:6 128:7  
132:5 134:18 136:11  
141:14 150:2  
153:12,23 157:10  
170:25 171:5 172:4  
173:10,20,21 178:5  
**letter (7)** 148:16 150:24  
153:24 154:24,25  
156:5,6  
**level (10)** 4:13 29:2  
77:10,18,20  
87:18,21,25 126:4  
127:19  
**liable (5)** 27:9  
53:13,14,15,18  
**liar (1)** 66:10  
**light (2)** 100:10 106:15  
**like (27)** 19:10 38:10  
42:18 46:4 47:1 51:14  
58:13 66:4 74:19,23  
82:8 86:13 98:16,20  
107:22 119:7 126:14  
131:1 143:16 164:9  
165:9 170:24 174:23  
175:22 178:16 179:25  
180:11  
**likely (1)** 127:23  
**limit (1)** 120:22  
**limitations (2)** 28:14  
35:17  
**limited (3)** 58:3 83:12  
151:16  
**line (4)** 61:25 94:20,24  
98:2  
**links (1)** 37:4  
**list (7)** 1:10 4:14 98:19  
102:18 158:10 183:15  
184:2  
**listed (2)** 5:6 149:23  
**listen (1)** 29:12  
**literally (1)** 149:5  
**little (9)** 36:1 57:25  
101:7 103:1 104:23  
113:1 121:23 168:10  
176:21  
**lloyds (2)** 122:18,23  
**located (1)** 176:16  
**locked (1)** 10:11  
**log (40)** 15:14 17:10  
32:3,4,4,5,15 33:1,20  
34:2,21 40:5,15,19,  
42:9 44:22 45:12  
48:6,6 70:5 73:4,12,21  
74:13 75:19 76:7,9  
91:12 95:1,7 114:6,7  
128:25 131:19 140:19  
155:9 160:1 178:17  
180:18 182:2  
**logged (8)** 13:8 15:7  
41:1 44:16 56:3 133:6  
178:16,22  
**logging (2)** 135:7  
168:22  
**logic (1)** 49:3

**logically (1)** 51:11  
**login (2)** 74:7 137:9  
**logs (11)** 40:11 44:10  
46:15 67:18,20  
73:5,11 74:6 75:14  
89:11,12  
**long (16)** 7:15 8:1 22:10  
26:13 28:6 35:25 37:1  
40:14 58:24 98:14  
110:23,24 111:17  
157:5 167:12 179:4  
**longer (3)** 24:4 79:13  
182:7  
**look (79)** 1:15 2:13 4:4  
5:2 13:3 21:24 22:19  
40:25 52:1 58:12,13  
59:20 67:6,16,17 81:8  
83:6 90:15 95:3,14  
96:8 100:5 102:15  
104:3,17 105:16,20,23  
107:14,18 108:3  
110:20,23 111:4,7,22  
114:11,19 115:2,9,17  
116:11 119:10,17  
120:14 128:7  
129:15,18 132:5  
133:24,25 134:18  
136:5 139:2 141:14  
147:10 153:12 154:24  
155:9 156:8 157:9  
169:4,5 170:25 171:5  
172:4 173:10,10,20,21  
174:9 175:5,13 177:10  
178:5,8,24 179:25  
184:11  
**looked (18)** 22:7,23  
23:9,25 25:4 56:16  
57:8,14 65:22 81:7  
105:25 111:8  
120:10,12 122:6 124:4  
143:1 177:2  
**looking (25)** 5:19 7:25  
14:11 21:10 25:23  
33:6 40:17,23 41:4,13  
44:4,4,24 68:20  
81:1,18 95:5 111:3  
126:20 132:9,10  
137:22 140:20 170:4  
172:21  
**looks (7)** 41:10 51:14  
169:20 173:3 177:6,25  
178:15  
**lordship (8)** 1:3,4 95:8  
97:19 102:25 183:7,15  
185:15  
**lordships (3)** 1:10  
114:17 133:17  
**loss (33)** 52:19 55:18,24  
102:4 106:14 109:16  
112:16,23 116:23  
117:8,14,15 118:7  
124:2,8,10,23 128:23  
129:4 142:17,20,21,22  
144:19,21 152:9 155:6  
156:2 159:20 160:8,25  
161:19 177:16  
**losses (1)** 183:24  
**lost (6)** 21:13,14  
24:13,20 25:1 181:12  
**lot (3)** 29:3 55:22  
118:18  
**lots (7)** 18:14 28:19  
41:8 69:25 70:19

101:14,14  
**lottery (3)** 69:5 79:21  
82:9  
**loud (5)** 11:16 12:8,9,14  
56:11  
**louise (5)** 119:22,23,24  
120:7 139:16  
**low (2)** 11:2 15:11  
**lower (3)** 17:1 61:22  
64:2  
**lump (1)** 109:6  
**luncheon (1)** 99:12  
**lying (1)** 66:11  

---

**M**

---

**m (10)** 33:10 34:10  
41:4,5,13 91:17,17  
95:18 96:14 175:14  
**machine (5)** 69:2,15  
75:16 82:9 101:13  
**magic (1)** 26:17  
**magnification (1)**  
168:10  
**magnum (1)** 183:25  
**main (7)** 3:7,13 5:11  
10:1,11 25:18,19  
**mainly (2)** 6:8 164:12  
**maintain (1)** 143:2  
**makes (3)** 42:7 60:24  
113:9  
**making (3)** 27:22 68:7  
78:9  
**manage (2)** 6:9 170:13  
**managed (1)** 107:9  
**management (1)** 175:5  
**manager (14)** 6:7,9,14  
40:9,12 54:3,5,9,24  
55:3,17,22 98:3  
160:23  
**managers (1)** 4:13  
**mandatory (3)** 10:17  
13:15,16  
**manipulate (1)** 113:10  
**manner (1)** 151:12  
**manually (3)** 16:11  
59:10 82:13  
**many (8)** 3:22 5:20  
59:21 101:21 104:25  
164:15 180:12 183:21  
**mark (9)** 1:1  
67:13,19,20 68:13,15  
76:16 91:15 186:3  
**massively (1)** 98:15  
**matched (1)** 52:18  
**material (1)** 104:17  
**matter (9)** 58:2 87:9  
93:23,24 94:6 107:19  
111:1 150:19 156:8  
**matters (6)** 42:25  
100:21 106:18,18  
148:11 152:11  
**maybe (9)** 18:12 21:11  
35:23 60:9 61:4,9  
78:5,14 143:22  
**mean (40)** 3:9 4:10 7:21  
8:1,8,25 16:13 21:10  
27:15 28:1 31:5 40:10  
51:11 52:1 57:1,10  
65:5 67:2 70:20 76:25  
77:7,9,11,19 78:22  
88:25 89:5 111:11  
112:8 119:14,14  
152:25 168:12

170:23,25 179:6  
180:11 181:3,20  
185:11  
**meaning (1)** 119:12  
**meaningfully (1)** 91:1  
**means (9)** 8:11 36:22  
50:12 76:24 78:24  
82:10 121:19 182:17  
183:11  
**meant (4)** 66:23 77:2  
117:21 159:9  
**mechanism (1)** 82:17  
**meeting (4)** 8:8 150:25  
151:22,23  
**member (8)** 26:20  
34:24 101:25 119:21  
129:3,11 160:7 185:2  
**members (2)** 3:23,25  
**memo (18)** 71:2,24  
72:2,3,4,6,15,23  
73:20,22  
75:17,18,19,24 76:1  
82:23 98:17,19  
**memory (5)** 107:5  
111:23 112:12 146:11  
167:13  
**mention (10)** 9:17  
17:15,19 21:8 70:17  
89:2 117:2,4,5 120:2  
**mentioned (7)** 96:11  
108:15 122:24 125:8  
131:12 142:12 156:9  
**message (8)** 70:20 76:1  
82:9 95:22 133:11  
137:13 160:13,15  
**messages (1)** 72:21  
**messed (1)** 127:16  
**method (1)** 74:8  
**michael (1)** 4:23  
**middle (5)** 37:8 84:25  
115:18 130:1 182:16  
**might (23)** 8:1 9:11  
11:4 24:12 26:6 36:1  
60:1 72:12 93:10  
98:24 111:5 120:14  
127:15,15 130:21  
138:16 140:20 146:21  
168:3,10 169:14  
170:21,22  
**mile (1)** 167:20  
**mind (6)** 22:22 119:5  
124:22 149:14 154:3  
178:21  
**mine (4)** 7:14 63:22  
129:4 160:8  
**minimise (1)** 178:6  
**minus (4)** 53:3 77:5  
80:19 177:1  
**minute (3)** 37:13 64:19  
85:12  
**minutes (24)** 36:23,25  
37:1,2 59:11 76:16  
79:14 83:19,20,21  
84:3,21 85:6,20  
133:14 149:5 153:17  
161:25 162:14  
178:9,13,25 179:20  
182:8  
**miscount (2)** 128:23  
159:24  
**misjudged (1)** 109:10  
**miskey (4)** 42:1,3 44:5  
92:23

**miskeying (1)** 97:11  
**misplaced (1)** 24:20  
**misremembering (1)**  
72:13  
**miss (1)** 43:16  
**missed (3)** 58:15  
82:22,23  
**missing (11)** 18:21 19:6  
26:24 27:8,16 34:11  
47:10 49:18 52:3 60:8  
135:13  
**mistake (27)** 9:8,20  
27:23 42:7,10,14  
69:21 71:7,10,11,15  
80:19,25  
82:4,22,22,23,25  
87:16 90:10 91:8  
92:8,20 94:1 109:15  
177:12,13  
**mistaken (3)** 40:8 66:11  
88:5  
**mistakenly (2)** 70:8  
80:12  
**mistakes (10)**  
42:17,18,20,23 43:7,9  
44:16 93:1,4,5  
**misunderstanding (1)**  
74:5  
**mmla001 (2)** 5:7 64:3  
**mmhm (3)** 127:12  
143:8 169:11  
**mode (3)** 33:20  
34:19,21  
**mohammad (2)** 64:6,15  
**moment (18)** 2:21  
24:25 36:18 45:10  
82:19 84:19 95:4  
110:18 118:12  
119:11,15 127:8  
138:21,24 153:24  
157:11 170:5,12  
**moments (1)** 177:2  
**money (60)** 21:2 23:7  
24:8,8,10,18  
26:17,24,25  
27:7,11,15,17,24,24  
28:2,3 32:5  
38:11,17,24 39:2,4,5,6  
43:4 46:5,6 48:8,13  
49:8 50:5 52:3,1  
60:16 69:10,13 80:17  
82:14 92:3,3,11,13,19  
121:4,12,16 124:25  
125:1 130:15 131:25  
141:21 142:10  
143:12,25 144:16  
152:20,22 154:10  
160:14  
**monies (1)** 27:15  
**month (2)** 21:19 67:21  
**months (2)** 56:14  
107:16  
**mood (1)** 43:16  
**more (20)** 6:6,13 7:20  
12:6 13:4 18:12 22:4  
24:11 49:7 83:16 84:5  
107:20 118:18 123:8  
126:10 128:4 146:12  
166:24 181:14 185:20  
**morley (1)** 156:6  
**morn (1)** 128:24  
**morning (15)** 1:20 8:4  
35:6,13 69:7,9 70:6

97:7 98:22 128:25  
141:7 159:25 160:1  
165:5 166:6  
**most (13)** 1:14 5:22  
7:22 10:3 23:23 42:22  
65:18 93:4 100:24  
163:15 165:4 166:5  
176:11  
**mountains (1)** 58:1  
**move (8)** 11:19  
33:2,9,17 44:21 66:19  
153:23 169:4  
**moved (2)** 14:17 20:12  
**moves (1)** 25:22  
**moving (3)** 44:3,20  
61:20  
**ms (38)** 6:19 11:5 23:5  
56:8,14,22 57:9 60:23  
65:21 73:19,24 74:20  
75:5 76:2 78:25 79:19  
80:8 82:4 83:7 84:9  
86:1,22 87:3,14 88:11  
100:9 102:14 106:15  
107:12,17 116:9 118:9  
125:9,18 133:25 146:2  
147:14 169:3  
**much (27)** 8:20 28:8  
37:12 55:5 59:19  
79:13 83:16 84:5  
97:18 98:5,6 107:2  
112:6 132:16 133:2  
143:17 150:8 161:24  
162:4,18 171:24 176:4  
180:14  
185:13,17,18,25  
**muhammad (8)** 4:9,24  
6:5,8,21 7:2,13 35:8  
**multiplied (1)** 155:23  
**must (17)** 11:20,22,24  
27:1,13,21,21,21,22  
51:11 109:10 128:23  
136:1,22 151:14 158:4  
159:24  
**mustnt (1)** 182:17  
**myself (11)** 4:1 6:22  
75:21 101:24 112:1  
115:23 125:1  
152:19,19,23 185:20  

---

**N**

---

**n (1)** 172:22  
**name (4)** 54:24 55:3  
63:17 99:21  
**names (1)** 4:14  
**natural (2)** 126:15  
176:11  
**nature (3)** 101:8 104:8  
149:15  
**navjot (3)** 54:5 55:4  
98:4  
**nbsc (4)** 155:7,9 176:9  
177:18  
**near (1)** 21:12  
**nearby (1)** 3:15  
**nearly (1)** 144:20  
**necessarily (6)** 40:10  
54:19 65:7 114:18,23  
126:6  
**necessary (2)** 45:14  
125:16  
**need (36)** 11:13,15  
12:15 13:24 19:6  
31:25 32:10 35:10

39:22 56:11,24 57:18  
 58:12 59:12 78:10  
 83:16 88:9 89:10  
 94:12 105:10 113:15  
 114:18,23 115:4  
 133:22 134:25 149:6  
 153:14 168:3,4 169:4  
 171:7 176:22 178:6  
 179:9 185:15  
**needed (6)** 29:21  
 30:1,6,23 84:6 139:6  
**needs (1)** 121:12  
**negative (21)** 80:12,16  
 81:4,9,11,13,16,20,24  
 82:1,2,6,12 83:3 84:14  
 87:7,12,17 88:14,19  
 89:23  
**network (3)** 145:2  
 154:21 156:19  
**networks (1)** 29:5  
**never (11)** 22:1 66:9  
 119:5 124:23  
 138:21,21 139:9,9  
 152:16 154:10 170:23  
**nevertheless (2)** 124:14  
 143:11  
**news (1)** 164:12  
**newsagent (2)** 164:10  
 165:1  
**newspaper (1)** 165:15  
**newspapers (1)** 164:12  
**next (23)** 12:19 16:6  
 21:1 28:13 38:25  
 60:23 61:19 62:18  
 63:14,15 84:13  
 92:1,17 99:4,4 129:7  
 135:2,13 136:5 137:9  
 162:6 176:16 184:5  
**night (2)** 92:7 173:5  
**nil (1)** 51:13  
**nine (1)** 151:5  
**nobody (2)** 32:22  
 178:20  
**nods (2)** 5:16 133:8  
**noncommittal (1)**  
 161:19  
**none (3)** 55:20 98:25  
 181:7  
**nonetheless (2)** 51:8  
 70:11  
**normal (3)** 10:4 166:22  
 185:9  
**normally (6)** 10:20  
 147:4 159:5 166:5,6  
 178:20  
**note (3)** 108:16 114:17  
 175:14  
**notes (12)** 118:1  
 174:1,4,7  
 175:19,21,23,24  
 176:3,4,14 180:13  
**nothing (19)** 13:18,19  
 19:8,25 20:3 24:22  
 25:5,7 26:21 39:9 49:9  
 97:14,16 124:15  
 155:25 157:3 167:21  
 170:7 177:11  
**notice (11)** 71:1,6,14  
 72:15 73:9,11,13  
 74:16 75:17,20 98:16  
**noticed (3)** 14:24  
 137:20 155:23  
**noticememo (1)** 74:23

**notified (1)** 156:14  
**notify (1)** 156:15  
**noting (1)** 155:12  
**notorious (2)** 102:20,22  
**notwithstanding (1)**  
 66:14  
**november (4)** 33:4,23  
 107:13 148:14  
**number (17)** 32:19 48:7  
 54:6,15 78:8 87:11  
 89:7,12 90:8,17,23  
 96:11 106:18 121:25  
 160:25 161:4,17  
**numbers (2)** 116:16  
 146:17  


---

**O**

---

**oath (2)** 1:21 124:14  
**observation (2)** 157:14  
 180:1  
**observations (2)** 102:8  
 149:25  
**obvious (5)** 81:1,17,20  
 156:22,25  
**obviously (1)** 1:25  
 12:9 18:9 21:12 22:3  
 26:13 27:25 29:4  
 34:11 36:10,14 49:3  
 54:12 104:12 123:22  
 126:18 149:13 153:20  
 164:15 182:1,22  
**occasion (4)** 34:24  
 115:25 131:20 156:16  
**occasionally (1)** 7:24  
**occasions (1)** 155:2  
**occur (2)** 123:18 131:1  
**occurred (9)** 58:11  
 92:10 108:9,11,14  
 131:5 137:10 169:13  
 181:3  
**occurrence (1)** 8:6  
**occurs (1)** 134:22  
**oclock (4)** 35:6,13,14  
 166:7  
**october (3)** 151:9,10  
 163:20  
**offences (1)** 149:13  
**offered (2)** 101:11  
 120:19  
**offers (1)** 120:24  
**office (176)** 2:22  
 3:8,12,23 4:3  
 6:7,8,10,13,19,23,24,25  
 7:1,7 8:20,25  
 10:3,11,17,19 11:23  
 14:2 15:17 17:25  
 18:1,2,5 20:1 25:22  
 26:10,22  
 27:6,10,14,20,25  
 28:11,24 29:1,4,7,9  
 31:15 32:3,4 36:11,12  
 38:5 39:2 43:10,10,16  
 44:17 48:14 49:6  
 54:1,18 56:16 57:12  
 58:21 60:4 61:8,11,13  
 62:3 63:6,12  
 64:11,12,17,20,24  
 65:14 66:6 67:17  
 69:1,7,13,14,18  
 70:7,21,24 71:3,14,19  
 72:16,19 75:10,12  
 78:19 80:17  
 82:11,21,24

87:6,17,24 88:13  
 89:6,14 90:5,8,14  
 91:3,5 93:9,13,23  
 97:6,16 98:18  
 101:10,11,18 105:2,19  
 107:10 109:25  
 113:3,11 114:1 115:24  
 118:12  
 120:16,19,22,25  
 121:3,7,11 122:14  
 124:3,20,24 126:16  
 129:25 130:16 132:1  
 133:18 138:13 142:18  
 143:17 144:19 147:23  
 148:16 151:15,18  
 152:2,14,20  
 154:10,17,24  
 156:6,14,22 157:19  
 160:24  
 164:3,4,6,8,18,22  
 165:2,5,10,12,16,17  
 167:2,17,19 168:20  
**offices (20)** 9:9 11:5  
 18:2,5 28:5 38:2 46:1  
 47:2 52:2 53:13 54:21  
 56:7 69:12 80:18  
 90:11,14 93:16 114:25  
 121:13 175:1  
**official (21)**  
 151:3,6,11,13,15,16,25  
 152:2,12,18,20 153:2  
 154:6 155:4,14,20,25  
 156:3,10,23,25  
**offline (1)** 119:15  
**often (4)** 60:14  
 103:21,23 104:3  
**oh (4)** 83:19 127:16  
 138:15 146:20  
**okay (118)** 2:23 8:24  
 10:1,3,8 11:9,14,17  
 12:17,21 13:7 15:6  
 20:24 26:25 29:25  
 31:23 32:12,21 35:11  
 42:7 56:13 57:22  
 58:22 59:1,2 68:14  
 69:10 75:16 78:5  
 79:5,18 82:11,16  
 84:11 86:8,15,25 88:3  
 91:5,24 92:3 95:13  
 96:2,10 97:11 102:11  
 107:24 110:17 114:13  
 117:9,12 118:16,21  
 119:10 120:2 123:9,13  
 124:18 126:10,17  
 128:7,14 130:14,18  
 131:16,21 132:4  
 133:11,24 134:7,11,18  
 135:11,12,19 136:3,4  
 139:8,13,18 142:25  
 143:21,23 144:5,24  
 146:4 149:7 153:23  
 154:22  
 158:11,17,24,25  
 159:11 164:9,20,22  
 167:4,14 168:6,13,21  
 169:21 170:4,16,25  
 173:10,25 174:4,20  
 175:2,10,18 178:13  
 179:17,23 182:6,15  
**omitted (1)** 112:22  
**once (7)** 7:21 14:1 48:3  
 87:2 137:15,25 177:13  
**onesided (1)** 143:18

**oneway (2)** 72:18,18  
**online (11)** 128:11  
 133:20 134:18,21  
 137:2,6 138:14,15,16  
 151:13,14  
**ons (1)** 114:6  
**onscreen (2)** 137:15,25  
**onto (6)** 55:8 111:21  
 130:17 156:20 165:10  
 180:22  
**onwards (1)** 18:4  
**open (5)** 3:11,16,17  
 10:7 35:6  
**operate (1)** 3:16  
**operation (3)** 7:18  
 10:4,21  
**operator (23)** 18:11  
 27:19 33:2,9,17 35:9  
 40:16,22 41:4  
 43:14,17 54:17,19  
 58:17 59:3 61:6,9  
 75:18 95:10 103:4  
 113:8,13 172:25  
**opinion (2)** 32:22,23  
**opportunity (3)** 2:4  
 21:22 57:5  
**opposed (1)** 119:15  
**opposite (1)** 64:21  
**option (2)** 20:23 147:3  
**opus (2)** 1:16 2:9  
**orally (1)** 185:4  
**order (9)** 4:11 44:22,23  
 95:9 98:21,24 110:23  
 112:5 120:10  
**ordering (1)** 41:19  
**original (4)** 20:25 96:7  
 107:3 117:23  
**originally (1)** 100:19  
**others (6)** 5:22 6:3 28:3  
 104:25 183:20,23  
**otherwise (1)** 46:7  
**ought (1)** 98:17  
**ourselves (1)** 43:24  
**outage (32)** 114:9,21  
 115:1,6 119:1,7,12,13  
 130:15  
 131:5,12,13,14,19  
 132:2 133:19  
 167:6,9,11,15,23  
 168:1,20,25  
 169:6,14,22 170:4,19  
 171:1,19 177:12  
**outages (2)** 130:23,25  
**outgoing (1)** 11:24  
**outside (1)** 58:4  
**over (31)** 2:7 14:17  
 22:16 27:4 29:1,19  
 37:5 40:17 46:9 51:12  
 79:17 84:14 88:15  
 95:5 100:8 101:22  
 106:24 107:16 111:11  
 120:1 122:21 123:20  
 142:17 146:20 155:13  
 159:13 167:13 169:14  
 173:10 174:11 180:1  
**overall (1)** 177:10  
**overnight (1)** 182:19  
**oversight (1)** 22:3  
**overspeak (1)** 144:8  
**own (9)** 10:14 19:15  
 27:11 28:24 29:4,5  
 75:8 152:11 166:21

**pad (1)** 169:15  
**pages (1)** 138:20  
**paid (6)** 53:20 124:22  
 125:1 128:21 159:17  
 175:25  
**painful (1)** 179:4  
**pakistan (2)** 58:2 85:14  
**paper (5)** 63:18 117:25  
 121:23,24 138:19  
**papers (1)** 164:10  
**paperwork (2)** 14:2  
 105:19  
**paragraph (54)** 9:4,17  
 11:12,12,14  
 12:11,15,25 14:12  
 18:23 47:14 50:12  
 67:5 68:20,22,23,24  
 69:16 71:16 72:5,10  
 73:2,10 74:22,22  
 76:12,20 79:1,2 80:3,7  
 83:6,15 84:5,8  
 86:5,11,17,19,22  
 87:16 94:2 105:24  
 106:9 108:8 110:21  
 115:18 116:14 134:1  
 139:19 147:14 151:2  
 155:1 184:3  
**paragraphs (8)** 11:10  
 56:9,10 72:13 73:17  
 75:4 86:1 90:22  
**pardon (2)** 60:18 64:4  
**park (1)** 157:13  
**part (2)** 108:11 116:20  
**particular (12)** 11:25  
 103:15 108:19 123:24  
 131:6 145:11 147:2,6  
 152:22 168:24  
 180:3,18  
**particularly (1)** 152:15  
**partly (1)** 132:11  
**partner (2)** 90:12  
 121:13  
**parts (2)** 25:25 26:3  
**party (1)** 2:3  
**pass (1)** 160:18  
**passed (3)** 110:10,15,17  
**passport (1)** 41:14  
**past (8)** 44:14 83:9  
 85:2,16 98:11 99:3,10  
 162:15  
**patny (19)** 99:8,9  
 162:7,22,23  
 163:2,5,17 168:6,16  
 177:20 179:19 180:25  
 182:12 183:8,10  
 185:24,25 187:13  
**patnys (1)** 181:17  
**pattern (1)** 45:6  
**pause (21)** 12:18,20  
 25:2 48:21 56:12  
 59:17 79:16 80:1  
 84:10 86:7,14,16,24  
 96:14 123:14 134:2,6  
 148:19 149:1,3 178:3  
**pausing (1)** 1:24  
**pay (5)** 79:11 82:10  
 125:4 160:14,16  
**paying (4)** 83:9  
 121:23,24 123:2  
**payment (1)** 169:15  
**payments (2)** 120:21  
 135:22  
**pba (1)** 97:1

**peak (3)** 141:10  
 144:4,25  
**pence (2)** 166:20,23  
**penultimate (1)** 139:20  
**people (15)** 3:7 7:19  
 31:18 32:14,17 42:16  
 49:4,5 72:19  
 103:17,18 120:20  
 164:15 165:5,6  
**per (2)** 5:21 27:10  
**perfect (2)** 27:20  
 122:12  
**perfectly (7)** 27:2 96:1  
 116:7 124:11 126:15  
 176:19 181:5  
**perform (5)** 28:23 31:6  
 63:6 69:8 147:7  
**performance (1)** 148:15  
**performed (14)** 16:4  
 18:25 22:15 31:5  
 47:25 61:14,15  
 62:4,12 63:16 65:11  
 75:16 76:4 114:6  
**performing (3)** 42:10  
 64:17 120:7  
**performs (1)** 63:24  
**perhaps (7)** 20:21 21:11  
 22:3 49:6 111:25  
 121:19 173:15  
**period (12)** 21:14 22:16  
 40:5 51:12 92:7  
 114:3,6 129:1 151:5  
 160:2 174:11 176:8  
**person (7)** 5:25 36:23  
 73:5,12 74:6 76:9  
 165:4  
**personal (4)** 32:22,23  
 43:15 75:8  
**personally (11)** 20:6  
 22:15 24:12 37:22  
 73:1,9,25 75:25 76:1  
 92:10 103:21  
**personnel (2)** 27:3,6  
**phone (3)** 32:8 55:16,23  
**phoned (10)** 31:10  
 33:24 40:12 70:2,7  
 120:10 129:3 144:22  
 160:7 173:6  
**phoning (1)** 127:3  
**phrase (1)** 76:25  
**physical (13)** 1:6 14:22  
 16:24 22:13 39:8,9,10  
 47:19 49:24 51:3  
 52:16,17 78:8  
**physically (9)** 11:25  
 16:17 20:12 25:14  
 27:11 30:17 39:10,13  
 50:5  
**pick (1)** 54:25  
**picture (1)** 179:18  
**piece (4)** 118:2  
 138:19,19 176:21  
**pieces (1)** 183:12  
**pile (1)** 176:14  
**pin (1)** 169:15  
**ping (1)** 79:4  
**pinged (1)** 90:6  
**place (13)** 36:9,10 43:6  
 108:25 109:1 143:16  
 147:12 148:7  
 154:3,5,7 167:6 180:1  
**plain (1)** 104:14  
**plainly (1)** 105:9

**planned (1)** 185:8  
**plausible (1)** 176:19  
**pleading (1)** 90:17  
**please (75)** 1:3 3:10  
 4:2,5 6:16  
 11:6,9,12,15  
 12:16,19,25 15:10  
 22:11 26:1  
 33:1,2,9,10,18  
 34:4,5,10,17 37:3,3,9  
 38:15 40:15,16,22  
 41:4 42:2 54:23  
 55:1,10 56:10,11 57:7  
 58:17 59:3 62:7 74:24  
 78:25 79:3,25 84:9  
 85:1 86:6,12,15,23  
 91:7,12,13 92:20  
 94:19  
 95:2,10,11,12,13  
 96:4,14,23 98:21  
 99:20 100:5 129:23  
 144:18 151:17 155:6  
 157:9 168:9 182:23  
**plough (1)** 83:10  
**plus (2)** 175:24 177:5  
**pm (11)** 35:7 85:21,23  
 99:11,13 155:12,14,18  
 162:19,21 186:1  
**poca (6)** 121:12,16  
 128:13 131:9,11 161:6  
**pocket (2)** 27:11 166:21  
**pointing (1)** 139:23  
**points (6)** 28:10 39:7  
 90:21 111:1 181:17  
 182:5  
**pol (2)** 129:13 160:24  
**polfed (1)** 129:11  
**police (2)** 7:12 27:5  
**poor (1)** 57:25  
**pop (1)** 149:4  
**pops (6)** 71:4,21 73:6,7  
 74:6,13  
**position (17)** 14:20,21  
 16:25 25:18 28:2,4  
 30:24 35:19 36:16  
 87:1 93:16 130:20  
 152:7 153:3,6,8  
 170:18  
**positive (6)** 80:13,16  
 81:5 82:7,13 83:2  
**possible (18)** 17:18 22:5  
 26:18 46:8 60:7 112:6  
 113:17 118:25  
 122:20,24 125:3 140:2  
 147:8 161:19 169:8  
 185:13,18,19  
**possibly (5)** 98:13  
 101:24 132:3 170:8  
 182:9  
**post (170)** 2:22 3:12,23  
 4:3 6:7,8,10,13,19 7:7  
 8:20,25 9:9 10:3,17,19  
 11:5 17:25 18:1,2,5  
 20:1 26:10,22  
 27:6,10,14,20,25  
 28:5,11,24 29:1,4,9  
 31:15 32:3,4 36:11  
 38:2,5 43:10,10 44:17  
 46:1 47:2 49:6 52:2  
 53:13 54:1,18 56:7,16  
 57:12 58:21 60:4  
 61:8,11,13 62:3  
 64:11,12,17,20,24

65:14 66:6  
 69:1,7,12,13,14,18  
 70:7,21,24 71:3,14,19  
 72:16,19 75:10,12  
 78:19 80:17,18  
 82:11,21,24  
 87:6,17,24 88:13  
 89:6,14 90:5,11,14,14  
 91:3,5 93:9,13,16,23  
 97:16 98:18  
 101:10,11,18  
 103:21,24 105:2,19  
 107:10 109:25  
 113:3,11 114:1,25  
 115:24 118:12  
 120:16,19,22,25  
 121:3,7,11,13 122:14  
 124:3,20,24 126:16  
 129:25 130:16 132:1  
 133:18 143:17 147:23  
 148:16 151:15  
 152:2,14 154:17,24  
 156:6,14,22 157:19  
 158:10  
 164:3,4,6,8,18,22  
 165:2,5,10,12,16,17  
 167:2,17,19 168:20  
 174:21 175:1  
**postage (22)** 147:9  
 151:4,6,11,14,25  
 152:1,12,18,20  
 153:2,23 154:6  
 155:4,5,14,20  
 156:3,10,23 157:1  
 169:7  
**posted (1)** 130:4  
**postmasters (2)** 104:9  
 143:17  
**postoffices (1)** 52:4  
**posts (2)** 106:6 126:20  
**potential (1)** 149:12  
**pounds (3)** 128:4  
 166:20,23  
**power (36)** 102:3  
 107:21,22 108:9  
 109:20 110:5 112:19  
 113:12 114:1,8  
 115:1,6 116:2,22  
 117:2,4,5,7,13,20  
 118:6,9,13,14,19,20,22  
 119:1,1,13,15  
 131:13,14,18 134:12  
 167:10  
**practical (1)** 164:25  
**practice (3)** 127:8,14  
 166:2  
**precise (3)** 82:17  
 105:5,10  
**precisely (3)** 80:18  
 94:15 126:10  
**predominantly (2)** 58:4  
 69:2  
**prefer (1)** 85:7  
**premises (5)** 3:13 10:8  
 101:16,17 163:23  
**prepaid (1)** 151:16  
**preparation (1)** 106:25  
**prepared (1)** 104:11  
**preparing (1)** 104:18  
**presence (1)** 150:7  
**present (1)** 45:11  
**press (8)** 13:22 20:24  
 21:2 104:23 129:8

130:10 160:24,25  
**pressed (3)** 25:8 42:4  
 92:2  
**pressing (1)** 161:7  
**presumably (7)** 8:1  
 110:12 112:3 126:3  
 130:2 152:5 166:13  
**pretty (5)** 78:14 129:15  
 150:4 179:24 181:9  
**preventing (1)** 129:9  
**previous (6)** 37:4 55:14  
 129:22 147:18 150:16  
 184:21  
**previously (2)** 31:14  
 105:25  
**print (11)** 13:22,22,24  
 34:13,20 35:1 46:14  
 111:8,17 135:6 141:21  
**printed (14)** 13:13 14:1  
 17:9 30:8 48:6 58:19  
 118:18 137:17 138:2  
 139:21 145:20 147:5  
 169:7,8  
**printer (2)** 147:16,24  
**printing (4)** 128:15  
 145:17 147:10 159:1  
**printout (1)** 157:17  
**printouts (1)** 146:16  
**prints (1)** 13:17  
**prior (1)** 92:14  
**private (2)** 8:10 44:24  
**probably (12)** 12:24  
 21:11 36:18 50:15  
 62:21 111:11 130:14  
 136:10 149:20,24  
 182:22 183:23  
**problem (36)** 26:22  
 27:21,22 43:21 49:11  
 51:25 52:7 54:17  
 58:11 77:8,12  
 80:9,10,22 87:9,10  
 88:8,18 89:15,17  
 90:1,4 97:14  
 103:17,24 104:1  
 125:11 131:5,15 145:9  
 173:16,16,17  
 177:11,14 181:8  
**problems (8)** 3:22 110:6  
 145:17 167:21 168:24  
 177:22 183:23 184:21  
**procedural (1)** 72:21  
**procedure (18)** 23:6  
 24:16,18 27:9 75:12  
 92:12 134:12,15 138:8  
 139:5 140:9,10,11  
 143:1,6,20 147:11  
 168:23  
**procedures (7)** 6:22  
 19:8 27:14 31:16  
 138:9 148:4,7  
**proceedings (3)** 26:10  
 36:22 150:13  
**process (29)** 11:20  
 12:12 14:17 15:3  
 18:25 20:4,6,15 22:12  
 24:13 27:2 31:9 36:15  
 48:17,24 79:19,23,24  
 128:13 131:8 133:21  
 136:6 137:16 138:1  
 147:8,15 155:7 169:17  
 180:23  
**processed (5)** 73:1  
 75:25 91:22 130:1,16

**processes (4)** 51:4  
 53:1,3 146:22  
**processing (1)** 116:2  
**produce (2)** 28:19 98:19  
**produced (8)** 59:9  
 128:25 129:17 136:18  
 139:1 147:16,24 160:1  
**product (2)** 8:9 95:22  
**products (2)** 101:11  
 135:21  
**professionals (1)** 27:25  
**progress (1)** 137:8  
**promise (1)** 161:13  
**promised (1)** 161:18  
**prompt (1)** 147:4  
**prompted (2)** 111:23  
 112:12  
**proper (4)** 140:9,10,11  
 143:20  
**properly (14)** 20:3  
 22:23 23:11 24:2  
 26:14,16 27:3 43:7  
 44:16 57:1 137:12  
 138:9 145:6 177:14  
**proposals (1)** 184:13  
**propose (1)** 58:25  
**prospect (1)** 162:8  
**protest (1)** 154:12  
**prove (1)** 23:5  
**proved (1)** 92:9  
**provide (2)** 35:18 36:6  
**provided (9)** 3:1 26:9  
 29:21 30:1 57:13  
 71:14 102:13 118:2  
 136:23  
**provides (1)** 137:5  
**providing (1)** 12:1  
**provisional (1)** 123:7  
**proxy (1)** 182:4  
**purpose (1)** 10:25  
**purposes (2)** 2:2 45:11  
**pursue (3)** 45:15  
 74:9,23  
**putting (9)** 23:20 45:14  
 74:18 79:23 105:9  
 106:17 114:22 155:18  
 156:20

**Q**

**q (697)** 2:13,16,18,21  
 3:4,9,18,20  
 4:2,10,17,21  
 5:2,6,9,11,13,15,17,19  
 6:1,6,12,18 7:5,18,25  
 8:6,13,18,25  
 9:4,8,14,17,20,22  
 10:10,12,24 11:4,9,15  
 12:4,14,22,24  
 13:3,8,13,16,21,25  
 14:3,9,11,17,20,24  
 15:3,7,17,21,25  
 16:4,8,13,22  
 17:3,7,9,13,15,19,24  
 18:12,18,20,23  
 19:2,18,22  
 20:4,9,12,15  
 21:4,8,15,17,22,24  
 22:6,10,19 23:1,3,9  
 24:4,11,24  
 25:7,11,13,23  
 26:2,6,9,12 28:6,13,18  
 30:1,4,8,13,17,21  
 31:5,9,21,24 32:7,24

33:6,9,17,23  
 34:4,10,17,24  
 37:22,25 38:2,7,12,23  
 39:7,13,16,19  
 40:3,5,12,15,22  
 41:4,13,16,19,21,24  
 42:1,3,8,14,18,23  
 43:9,20 44:3,8,10,17  
 46:1,9,18,24  
 47:6,11,13,18,22,24  
 48:9,16,20,23  
 49:12,18,21,23  
 50:7,9,23  
 51:1,3,8,11,18,24  
 52:5,13,21,23  
 53:6,9,11,15,19 54:8  
 55:14,20,23 56:6,14  
 57:8,11,18,22  
 58:5,8,15,17,23 59:3  
 61:4,19 63:21,23  
 64:2,5,7,11,17,24  
 65:10,21  
 66:3,6,11,14,18  
 67:1,5,11,15,23  
 68:1,4,6,14,17,20,24  
 69:16,20,24  
 70:2,7,11,17  
 71:1,6,10,14 72:17  
 73:1,9,14,17,23 74:3  
 75:7,22  
 76:12,16,20,24  
 77:7,17,20 78:5 79:19  
 80:5,7,15,18,22,25  
 81:4,7,12,16,25  
 82:4,16,19 83:6  
 84:12,16,18  
 86:4,9,11,17,19,21  
 87:1,14,20,24  
 88:4,8,21 89:2,14,24  
 90:20 91:1,8,12,21  
 92:14,18,20,25  
 93:7,15,20,23 94:1,7  
 95:17  
 96:2,11,14,20,23  
 97:6,11,18 99:20,23  
 100:1,5,8,13,16,19,21,24  
 101:3,7,16,19,21,23  
 102:1,6,8,10,12,18,20,23,25  
 103:4,8,14,21,24  
 104:1,3,5,7,11,14,17,23  
 105:5,8,16,18,23  
 106:6,9,17,24  
 107:2,12,21,25  
 108:13,20,24  
 109:5,12,20,24  
 110:2,5,8,12,14,17  
 111:1,7,13,16,21  
 112:5,15,21,23,25  
 113:7,23  
 114:1,5,11,14,17  
 115:15,17 116:6,11,20  
 117:1,5,10,12,19  
 118:4,12,16,21,24  
 119:5,10,20,22,24  
 120:2,5,14,18,24  
 121:3,6,9,11,19,22  
 122:2,17,20  
 123:4,7,10,13,21,23  
 124:7,10,14,19  
 125:2,6,15,21,24  
 126:3,6,8,10,14,19,22  
 127:7,13,25  
 128:4,7,13 129:21

130:4,8,12,14  
 131:8,11,14,17,21  
 132:4 133:9,11,14,24  
 134:5,8,11,15,18  
 135:5,13,20,24 136:5  
 137:5,25  
 138:8,14,16,23  
 139:8,10,13,18  
 140:1,6,9,11,14  
 141:6,14,19  
 142:7,10,12,15,19,25  
 143:5,9,14,19,22,24  
 144:3,5,7  
 145:4,8,11,13,17,20,23  
 146:2,5,8,13,18,20,25  
 147:4,8,14,20,22  
 148:3,10,14,16  
 151:21,23,25  
 152:5,7,11,18,24  
 153:5,7,10,12,22  
 154:14,17,20,22,24  
 155:9 156:3,5,13,22  
 157:2,13,16,19,21,24  
 158:1,3,7,9,12,15,18,21,24  
 159:3,6,9,11,13,15,22,24  
 160:5,7,11,13,18,21,23  
 161:3,6,9,13,16  
 163:7,10,12,15,19,23,25  
 164:2,9,15,20,22,25  
 165:14,19,22,25  
 166:11,13,18,24  
 167:2,4,9,12,14,24  
 168:1,18,22  
 169:3,12,21  
 170:1,4,7,11,16,22,25  
 171:5,16,19,23  
 172:2,4,12,16  
 173:3,10,20,25  
 174:4,20,24  
 175:3,5,10,16,18,21  
 176:2,7,11,19,21  
 177:5,9,16,20  
 178:5,13,17,19,24  
 179:3,17,23 180:10,25  
 181:5,12  
**qualifications (1)** 28:25  
**quarter (5)** 37:13 85:16  
 98:11 99:3,10  
**query (2)** 143:24 144:15  
**question (36)** 1:10 6:16  
 9:15 15:10 22:10,10  
 24:11 26:1 28:7 34:11  
 35:23 39:23 48:22  
 49:12 52:13 57:7  
 66:12 67:11 73:23  
 74:19 75:2,22,23  
 79:10 94:22 95:1,5  
 106:5 126:10 131:3  
 133:18 150:20 154:1  
 164:9 170:13 181:23  
**questions (31)** 2:22 3:2  
 8:13,23 9:2 12:6 28:9  
 29:12,13,17,23 54:12  
 55:10 74:25 94:16  
 97:19,20,21 107:22  
 145:13,14 149:15  
 150:9,11,18 157:4  
 161:22,23 165:25  
 167:6 187:8  
**queue (3)** 165:12,13,17  
**queues (1)** 165:12  
**quick (3)** 97:22 134:18  
 138:17

**quicker (2)** 60:9,10  
**quickly (6)** 56:6 72:20  
 117:6 148:18,25  
 158:16  
**quite (22)** 6:16 7:20  
 15:9 17:22 22:10  
 29:17 36:3 56:4 59:24  
 60:17,19,20 71:17  
 73:23 89:18 97:22  
 112:11 120:18 125:24  
 127:10 143:9 185:11

**R**

**raise (3)** 28:2 54:1  
 167:2  
**raised (7)** 54:7,12  
 141:11 142:8  
 143:11,24 144:15  
**ran (4)** 7:7 18:7 163:23  
 164:17  
**rang (7)** 40:10 44:15  
 89:8 95:19 110:5  
 170:11 176:9  
**range (1)** 101:15  
**rather (15)** 12:7 42:10  
 59:10,24 67:13,19  
 70:9 77:5 81:5 83:3  
 92:4 117:17 119:3  
 139:3 183:18  
**raw (1)** 61:5  
**reach (4)** 92:15 99:6  
 106:6,8  
**reached (1)** 106:12  
**reacted (1)** 166:18  
**read (31)** 9:21  
 11:11,15,15  
 12:8,9,11,14 33:12  
 34:12 38:21 56:10,11  
 79:2,10,22,25 84:8  
 86:4,11,22 94:22  
 100:9 125:9 134:1,3  
 137:21 148:18,25  
 183:18 185:20  
**reading (1)** 106:15  
**readminister (1)** 2:3  
**real (1)** 125:18  
**realise (2)** 49:4 107:6  
**realised (2)** 15:21 92:8  
**really (13)** 35:11 38:6  
 59:18 75:23 85:9 94:6  
 98:17 104:20 125:21  
 152:16 157:6 178:21  
 181:22  
**reason (8)** 17:15 21:16  
 51:15 53:4 139:23  
 148:24 155:22 165:8  
**reasonably (1)** 160:21  
**reasons (4)** 7:10 25:3  
 116:7 143:22  
**recall (24)** 49:15,18  
 63:17 91:10 108:10  
 113:5 115:10,13,24  
 116:15 124:20  
 130:22,24 131:23,23  
 139:16,17 148:14  
 150:25 151:21  
 167:7,12,14 174:14  
**recalled (1)** 130:21  
**recap (1)** 125:8  
**receipt (17)** 133:15  
 135:3,6,8 136:1,14,17  
 137:14,16,22  
 138:1,3,4,10 141:9,21  
 158:5

**receipts (20)** 118:18  
 120:8 123:1  
 128:15,16,17,20  
 129:17 136:24 138:9  
 139:21 140:6 142:1  
 143:10 146:16 154:10  
 159:1,4,7,16  
**receive (1)** 120:21  
**received (13)** 70:2  
 73:9,11 76:1,13 80:11  
 96:16,17 97:2,6,12  
 115:21 141:24  
**receiving (1)** 14:7  
**recent (1)** 112:16  
**recognise (1)** 137:11  
**recollection (4)** 5:3  
 95:24 109:11 125:19  
**recommendation (1)**  
 90:15  
**reconcile (3)** 6:25 7:1  
 18:20  
**reconciliation (2)** 46:6  
 63:7  
**reconciling (1)** 31:16  
**record (10)** 4:3 55:9  
 91:14 127:2 129:1,19  
 144:21 146:25 156:21  
 160:2  
**recorded (4)** 55:20  
 135:25 142:4 156:18  
**recording (1)** 152:13  
**records (20)** 9:9 38:3,5  
 44:17 46:2 63:4,8  
 66:15,16 67:16,18  
 68:6,18 93:23 145:5  
 175:1 177:25  
 181:20,20 183:22  
**recover (1)** 133:12  
**recoverable (2)**  
 135:16,17  
**recoverablecancelable (1)** 135:21  
**recovered (1)** 134:16  
**recovering (1)** 155:5  
**recovery (17)** 128:17  
 133:21 134:23  
 137:8,12,14,16,16,22  
 138:1,1,3,10 141:9  
 168:19,23 169:17  
**rectifiable (1)** 42:21  
**rectified (2)** 43:8,9  
**red (6)** 112:11 113:20  
 122:13 126:20 139:3  
 157:24  
**reduced (2)** 77:4,24  
**reexamination (5)**  
 94:8,18 157:8  
 187:7,12  
**refer (10)** 66:23 71:16  
 73:2,10 108:17 116:6  
 117:12,21 139:9 181:7  
**reference (6)** 134:19  
 138:17 140:18 146:17  
 156:5 183:17  
**references (1)** 154:22  
**referred (10)** 10:6 63:10  
 71:21 100:14 107:15  
 112:23 123:4 136:13  
 151:1 156:17  
**referring (10)** 48:19  
 69:16 71:15 75:17,20  
 79:19 107:5 142:16  
 154:25 184:2



refers (2) 57:9 81:10  
 reflected (1) 16:25  
 refund (3) 144:2 145:3  
 155:13  
 refunded (5) 92:11  
 142:10 143:12,25  
 144:16  
 regard (1) 158:21  
 regarding (1) 104:21  
 regards (1) 160:24  
 register (1) 64:11  
 registered (3) 4:4 64:12  
 122:22  
 registration (1) 44:5  
 regularly (4) 56:4  
 60:17,19,20  
 reimburse (1) 27:23  
 rejected (1) 146:25  
 related (1) 105:19  
 relates (3) 44:8 79:8  
 140:3  
 relating (3) 69:20 97:7  
 108:21  
 relation (11) 20:5 21:20  
 40:7 67:7 68:14  
 106:19 109:15 125:12  
 139:24 140:3 150:10  
 relationship (2) 124:24  
 143:16  
 relatively (1) 163:20  
 relevant (11) 30:17  
 40:5 55:21 104:8,14  
 105:9,16 106:2,4,7,11  
 119:2 120:15 161:4  
 175:6  
 reliable (1) 7:17  
 relief (1) 64:9  
 relying (1) 146:10  
 rem (13) 42:6,10 43:2,3  
 95:20 166:2,8 169:25  
 170:1 172:24  
 173:4,7,13  
 remains (4) 49:8 89:21  
 90:13 110:8  
 remarks (1) 39:21  
 remedy (4)  
 140:20,21,23 155:10  
 remember (16) 28:16  
 60:14 64:10 91:9 95:8  
 96:20 97:13 116:24  
 127:16 138:12,18  
 156:12 160:17 165:23  
 173:5 177:2  
 remind (3) 99:4 125:10  
 184:23  
 reminded (5) 111:21  
 116:9 118:8 124:19  
 126:18  
 remmed (14) 42:11  
 43:1,4 95:22 165:20  
 173:22  
 174:11,13,15,16,24,25  
 175:18 176:7  
 remming (4) 42:11 91:9  
 173:18,19  
 remote (1) 43:23  
 removal (1) 16:24  
 remove (1) 171:8  
 removed (2) 11:25  
 22:20  
 rems (1) 170:2  
 repeat (10) 5:14 6:17  
 7:11 15:9 26:1 42:2

48:22 57:7 114:5  
 181:24  
 repeating (1) 112:1  
 replacement (1) 147:10  
 replenish (2) 11:1 60:15  
 report (18) 30:9 31:11  
 33:13 34:13 36:5  
 58:19 110:23 111:3,10  
 125:7 126:3,25  
 127:19,22,23 144:1  
 173:1 175:5  
 reported (3) 144:23  
 155:24 183:23  
 reporting (3) 28:14  
 127:8 142:23  
 reports (10) 18:14 19:4  
 28:20 29:7,8 30:13  
 32:1 35:1 46:11,25  
 representatives (1)  
 115:24  
 reput (1) 144:10  
 required (7) 82:21  
 128:9 134:24 165:9  
 168:19,23 174:21  
 requirement (1) 10:17  
 research (2) 104:21  
 146:12  
 reserve (1) 95:22  
 resolution (2) 92:14  
 96:23  
 resolve (11) 42:25  
 52:11 70:24 71:12  
 77:8,12 87:9,11 90:18  
 115:22,23  
 resolved (3) 42:21,23  
 142:21  
 resource (1) 104:12  
 respect (2) 109:16  
 150:12  
 respects (1) 6:6  
 responding (1) 102:14  
 responses (1) 28:7  
 response (5) 43:18  
 87:13 141:24 160:11  
 161:20  
 responsibility (1) 26:7  
 responsible (4) 53:24  
 170:19 171:20,23  
 rest (3) 10:21 55:7  
 84:16  
 restored (3) 134:12  
 137:3,7  
 result (7) 55:18,25  
 134:15 169:13,18  
 171:25 177:16  
 resulted (3) 118:7  
 141:10 148:16  
 resulting (1) 155:5  
 resume (1) 185:23  
 retail (15) 3:12,15  
 10:7,8 20:2 69:3,3  
 101:16,17 163:23  
 164:7,7,17 165:11,12  
 retailer (1) 69:11  
 retries (1) 141:24  
 reversal (12) 37:19,22  
 38:3,9,13 39:17  
 87:20,25 88:8,9 95:20  
 173:8  
 reversals (1) 153:25  
 reverse (5) 20:23,24  
 37:19 154:11,14  
 reversed (6) 21:6 48:10

50:23 151:7,9 154:2  
 review (2) 56:18 145:1  
 reviewed (1) 21:18  
 revisit (1) 98:22  
 righthand (2) 5:2  
 157:17  
 rights (1) 6:3  
 ring (8) 27:7  
 32:12,13,15 35:10  
 40:9 44:13 167:21  
 rings (1) 173:1  
 rise (1) 169:22  
 risk (1) 143:18  
 rm (1) 155:12  
 road (1) 167:20  
 robert (1) 4:24  
 robinson (8)  
 184:7,12,20  
 185:1,2,11,15,21  
 roll (1) 84:14  
 roller (1) 10:22  
 rollercash (1) 10:18  
 rolling (2) 10:14 46:9  
 rollover (1) 46:7  
 room (1) 8:10  
 roughly (2) 60:14 68:4  
 rouman (6) 4:9,16  
 6:5,21 7:3,14  
 round (4) 22:2 31:4  
 70:16 127:21  
 routinely (2) 126:3,9  
 row (58) 33:2,7 34:4,6  
 40:16,17,22  
 41:5,13,16,19,21,24  
 42:1,3 44:4,8 45:4,15  
 61:8 62:4,11,18 63:15  
 91:13 92:20 95:5,14  
 96:6,8,14  
 113:16,18,18 114:22  
 122:5 140:16 141:2  
 155:10,16  
 168:5,5,14,15 169:5,5  
 171:8,10 172:7,8,17  
 173:11,25 178:7,8,9  
 179:10,15  
 rows (8) 40:25 41:13  
 44:4 64:2 95:17  
 114:20 175:7,8  
 run (6) 18:2,9,14 19:4  
 98:15 162:15  
 running (6) 6:18 11:2  
 17:25 18:3 22:2  
 163:25  
 rural (1) 101:10

S

safe (7) 10:14,15,22,23  
 166:8,8 176:14  
 sales (3) 40:9,12 87:20  
 same (31) 3:11,17 4:22  
 14:6 20:19 23:20  
 30:18 51:4,12 52:16  
 60:10 62:13 64:18  
 71:23,24 77:13 82:14  
 92:7 103:18 114:6,24  
 121:14 137:1 163:23  
 165:8,22 172:4,20  
 173:11 178:13 184:2  
 satisfactory (5) 160:11  
 161:9,12,14,20  
 saw (11) 15:4 30:4 64:8  
 73:25 91:8 102:13

116:23 123:21 125:17  
 160:15 176:25  
 saying (41) 15:25 16:22  
 23:15,25 24:8,14,15  
 31:3,24 32:13,13  
 113:20,21  
 114:3,9,12,14,21  
 116:4,18 120:11  
 122:9,13,25 124:5,5,6  
 125:10  
 132:15,18,24,25  
 133:5,6,9,15,19  
 134:19 135:3,20,20  
 137:13,23 138:6  
 140:14 141:16,17  
 scanned (1) 173:13  
 scenario (4) 136:20  
 147:3 155:3 169:13  
 schedule (3) 115:2,9  
 116:7  
 scratchcard (5) 69:5  
 81:10 82:11,13 96:16  
 scratchcards (15) 67:8  
 69:20 76:21,22 77:5,6  
 78:7,12 79:8,20 81:13  
 82:1 89:13 97:8,9  
 screen (36) 1:16 2:9  
 4:17,19 5:3,20 11:11  
 15:17 16:2 25:9 33:9  
 44:25 46:21 71:4,22  
 72:23 73:6 74:13  
 101:3 110:21 111:9,10  
 122:9 126:21,24  
 132:17,19,23,23  
 134:21 137:21 148:20  
 160:13 167:17 169:5  
 171:11  
 screens (2) 133:22  
 139:10  
 scribbled (1) 118:1  
 scroll (9) 58:23  
 103:8,9,10 113:19  
 140:16 141:1 168:18  
 175:11  
 sd (2) 155:13,13  
 seat (2) 150:8 162:24  
 second (30) 4:9,10 9:18  
 23:17 25:8 28:22  
 34:24 37:7 48:1 54:23  
 64:20 65:12 94:21  
 100:9 102:12 103:6  
 105:23 107:14 108:8  
 125:15 146:5,13  
 148:21,23 150:24  
 151:1 156:7 173:25  
 174:2 183:8  
 secondly (2) 19:9 32:15  
 section (9) 75:20  
 115:17 116:12  
 135:2,14 137:21,22  
 141:16 180:4  
 sections (1) 45:2  
 see (146) 2:10,11 4:18  
 11:10 15:3 18:24  
 22:4,20 23:24 25:14  
 30:14,18 31:1  
 33:3,10,15,19,21  
 34:5,6,8,10,15 38:21  
 40:17,20  
 41:5,14,17,22 42:1,12  
 43:24 44:6 56:4 57:5  
 61:7,9,14,16,16  
 63:10,13,16,21,25  
 64:3 70:19 79:2 81:5

83:14 90:24 92:20  
 95:14,17 99:20 101:3  
 103:10 108:4,11  
 110:23 112:11  
 113:20,21  
 114:3,9,12,14,21  
 116:4,18 120:11  
 122:9,13,25 124:5,5,6  
 125:10  
 132:15,18,24,25  
 133:5,6,9,15,19  
 134:19 135:3,20,20  
 137:13,23 138:6  
 140:14 141:16,17  
 143:25 144:17 148:17  
 151:17,19 157:16  
 158:1 160:15  
 161:9,11,16 163:3  
 168:1,6,15,17,18,22  
 169:1,9 170:9,10  
 171:13 172:12,17  
 173:23,24  
 174:1,1,3,12 175:7,14  
 176:2,5,6 177:7,8  
 178:10,11,12  
 179:2,13,15,21,22  
 180:14 181:7  
 seeing (2) 4:21 91:10  
 seek (1) 32:8  
 seem (4) 106:2,4,11  
 149:22  
 seemed (2) 128:14  
 158:25  
 seems (6) 49:25 62:2  
 99:1 140:6 143:16  
 173:14  
 seen (15) 11:7 19:14,15  
 56:25 57:4,14,16,19  
 58:19 63:9 120:7  
 124:17 142:25 152:1  
 154:22  
 selfincrimination (1)  
 149:12  
 sell (1) 164:10  
 send (2) 82:12 174:22  
 senior (3) 6:6 99:9  
 185:24  
 sense (3) 16:1 52:20  
 125:12  
 sensible (2) 149:20  
 181:6  
 sent (13) 67:7,8  
 69:17,21 70:8,23  
 71:9,15 74:1,2 82:14  
 97:1 98:19  
 sentence (2) 50:13  
 139:20  
 separate (7) 32:7 74:7  
 78:4 117:1,13 147:9  
 164:22  
 separately (2) 16:15  
 45:18  
 september (14) 87:5  
 88:13 93:17,21 97:16  
 98:2 108:5 109:2,21  
 112:17,17 117:7  
 151:5,8  
 sequence (2) 15:18  
 118:17  
 sequential (1) 114:5  
 series (3) 89:17 139:21  
 156:17  
 serious (1) 181:8

seriously (1) 123:8  
 serve (2) 70:14 165:7  
 server (1) 29:6  
 servers (3) 28:24 29:5  
 36:11  
 services (3) 8:9 101:12  
 120:24  
 serving (2) 165:10  
 167:16  
 session (21) 95:21  
 121:14 128:16  
 133:12,15 134:23  
 135:2,3,5,6,25  
 136:14,17 137:11  
 138:4,10 142:1,4  
 159:7,9 168:25  
 sessions (2) 7:8 137:8  
 set (1) 109:17  
 sets (2) 70:3 139:5  
 settle (2) 135:5 158:4  
 settled (2) 112:17 136:1  
 settlement (1) 141:23  
 setup (1) 164:2  
 seven (5) 35:7,14  
 178:9,13,24  
 several (2) 18:5 27:16  
 shahir (1) 4:25  
 share (1) 103:3  
 sheet (5) 132:14,25,25  
 139:2 178:7  
 shoemsmiths (1) 129:12  
 shop (11) 3:12,16,17  
 6:9,10 10:8 28:2 69:4  
 82:8 119:16 164:15  
 short (18) 3:1 22:16  
 29:23,24 35:23 37:16  
 39:23 78:19 84:2  
 85:5,22 93:15 104:19  
 114:6 157:6 162:5,20  
 163:20  
 shortage (6) 142:3  
 152:24 169:19 170:24  
 172:23 173:6  
 shortages (1) 181:3  
 shortfall (38) 26:7  
 45:22 46:3,7 47:6,7  
 48:2,18,25  
 50:1,4,5,21,23  
 51:8,10,19 52:15,19  
 53:12,16,20 54:8  
 92:7,15 102:6 110:2  
 113:2 115:19,22,25  
 125:6,25 126:12  
 127:9,10 170:19 171:2  
 shortfalls (5) 53:14  
 93:2,3 116:13,16  
 shorthand (1) 85:12  
 shortly (4) 17:24 18:12  
 38:7 59:9  
 should (58) 2:10 9:21  
 12:2 14:3,14 20:21  
 21:11 22:4 23:8 24:10  
 29:23 34:12 38:17  
 50:4 51:13,13,14  
 52:18 56:3 58:18  
 62:22 64:9 74:9  
 77:4,20,24 78:1 80:13  
 82:6 83:2,3 88:1,10  
 89:5,6 97:9,10,12  
 99:17,20 129:7 136:20  
 137:6,15,25 138:3  
 139:14 141:21 142:2  
 143:1,10 147:7 150:1

152:1 159:3 160:21  
 161:3  
 shouldnt (5) 52:9,22  
 80:20 143:15 153:2  
 show (28) 12:2 17:10  
 18:15,18,20 24:1  
 28:20 34:13,25 38:3  
 39:16 40:5 44:11 46:2  
 58:8,25 59:6 61:4,6  
 66:3 83:16 84:4 115:6  
 132:17 142:1 171:3  
 174:10 179:3  
 showed (14) 17:7 30:19  
 48:1 51:10 76:21  
 128:16,17,20,22  
 144:19 147:18  
 159:7,16,19  
 showing (4) 56:2 58:20  
 87:7 176:24  
 shown (14) 5:19 26:19  
 40:24 52:24 59:16  
 62:4 64:7 65:13 66:14  
 91:16 94:19 157:10  
 171:24 173:6  
 shows (15) 33:23 40:6  
 41:9 46:25 56:23  
 57:12 58:10 59:1  
 60:11 61:11,25 143:2  
 171:12 173:25 180:24  
 side (13) 5:2 10:7 43:5  
 47:3 69:3,4,11 90:11  
 157:17 164:6:7  
 165:10,11  
 sides (1) 165:7  
 sideways (1) 33:10  
 sign (2) 14:3,10  
 signature (7) 2:14,16,17  
 99:24,24 163:8,10  
 signed (2) 108:5 115:15  
 signon (1) 178:14  
 silly (1) 164:9  
 similar (2) 54:22 115:5  
 simple (7) 17:17 22:5,5  
 123:17 124:11 137:5  
 148:3  
 since (4) 57:23 58:5  
 153:25 178:16  
 single (4) 48:14 138:18  
 139:2 179:14  
 singlecounter (1) 164:4  
 sir (146) 2:15 3:3 5:1,5  
 8:17 9:3,21 10:1 11:3  
 12:13,23 13:12,24  
 14:8 17:23 18:1 19:1,5  
 20:19 22:1 25:6,12,16  
 26:1 28:11,17 29:15  
 30:20,25 31:2,8 32:6  
 33:22 34:3,9,16,23  
 35:3,14,21 36:3  
 37:6,11,21,24  
 38:5,19,22 40:1  
 42:2,16,20 43:12  
 44:1,7,16 45:25  
 46:5,13 48:19  
 50:2,8,22 51:17,22  
 52:12,18 53:8,10,18  
 54:3,14,20,22  
 55:6,13,19 57:24 58:7  
 60:17,19 61:3,18  
 64:12 67:4,10 68:5,23  
 70:4,13 71:8,24  
 72:15,18 73:11,20,21  
 74:2 75:9,21

76:15,19,23 77:13,19  
 80:14,21 86:10 89:23  
 90:19,25 91:11  
 92:19,24 93:3,14  
 96:13 97:5,10,17 98:8  
 163:18,22,24  
 164:1,21,24 165:21,24  
 169:11 170:15  
 171:15,18 172:11,15  
 175:9,15,17,20  
 176:1,18 177:4,8,15  
 179:16 183:3  
**sit (1)** 83:25  
**sitting (1)** 1:5  
**situated (2)** 3:6,15  
**situation (8)** 87:2  
 117:17 124:19 148:5,8  
 149:2,13 182:21  
**situations (1)** 149:19  
**six (2)** 7:22 85:20  
**size (1)** 3:4  
**sizes (1)** 117:25  
**sj1 (3)** 9:6,11,17  
**skirting (1)** 31:4  
**slightly (2)** 114:19  
 179:4  
**slip (11)** 13:14,17  
 14:1,4,7 17:5 19:3  
 120:9 121:24,24 123:2  
**slow (1)** 79:12  
**slowly (2)** 50:10 52:5  
**small (10)** 9:8,20 10:18  
 27:17 58:2 75:23  
 101:17 110:19 129:13  
 169:18  
**snapshot (2)** 46:15 48:5  
**snapshots (2)** 46:10,19  
**software (14)** 18:4  
 24:20 26:16 27:20  
 38:19,20 49:10  
 51:15,22 52:2  
 54:19,20 60:7 93:5  
**sold (1)** 101:18  
**solicitor (1)** 94:4  
**solicitors (3)** 57:13,17  
 146:19  
**somebody (5)** 27:22  
 44:15 98:3 160:24  
 165:9  
**somehow (5)** 22:20  
 24:12 49:24 51:20  
 52:9  
**someone (9)** 42:8 43:1  
 74:13 80:19 92:21  
 165:1,14 173:1 176:13  
**something (31)** 19:10  
 36:14 38:23 48:4  
 51:15,16 52:12 54:13  
 68:17 72:6,20 77:9  
 102:20 104:7 126:14  
 127:16,17 142:12,17  
 143:3,6 149:6 150:16  
 153:2 155:23  
 165:1,2,15 173:9  
 175:22 180:3  
**sometimes (21)** 7:23  
 29:16 40:9 42:18  
 43:13,13,25,25  
 44:1,2,13 78:2,2  
 115:21 161:25 162:2  
 166:17 180:2,5,21  
 182:12  
**somewhat (2)** 98:11

185:9  
**somewhere (9)** 24:21  
 32:17 38:17,25 39:2  
 51:17 88:18 108:17  
 177:12  
**son (17)** 164:16 165:22  
 166:3,9 172:10,16  
 173:3 176:9 177:19  
 178:14,15 180:12  
 181:17 182:3,5,23  
 185:25  
**soon (5)** 46:14 70:5  
 73:21 75:18 76:7  
**sort (21)** 95:12,12,13,13  
 103:16 105:19 120:20  
 121:25 126:4 127:19  
 128:24 129:4 156:11  
 157:16 159:24 160:8  
 165:3 166:14 173:17  
 177:22 183:12  
**sorts (1)** 179:25  
**sotto (1)** 12:8  
**sound (1)** 164:9  
**sourced (1)** 105:22  
**sp1 (30)** 9:10,21  
 10:6,12,14 11:1 13:10  
 14:17,21,25 15:7,15  
 16:7 20:12,16,23  
 22:15 25:17 30:4  
 39:3,5,5 47:12 48:3  
 49:16 61:1,13  
 62:13,15 63:23  
**space (1)** 103:2  
**speak (5)** 15:12  
 129:8,11,12 160:23  
**speaking (3)** 144:14  
 160:24 161:18  
**specific (8)** 7:20 9:25  
 14:11 28:10 55:10  
 105:1 107:20 108:10  
**specifically (3)** 3:20  
 35:12 42:10  
**specified (1)** 158:5  
**specify (3)** 116:22  
 117:14 147:4  
**spencefield (1)** 163:19  
**spoiled (2)** 147:9,13  
**spoke (2)** 44:15 161:6  
**spoken (1)** 161:17  
**spotted (2)** 95:8 140:22  
**spreadsheet (13)** 44:3  
 57:16,19 58:20  
 59:4,5,16 61:4 63:3  
 96:4 114:19,20 171:5  
**spreadsheets (1)** 57:15  
**square (3)** 1:11  
 183:16,20  
**stack (10)**  
 130:1,7,8,9,10,12  
 131:11,25 132:2  
**staff (15)** 3:23,25 4:14  
 6:23 24:17 26:20  
 32:25 34:25 73:12,14  
 101:25 119:21 129:4  
 160:8,18  
**staffing (1)** 27:22  
**stage (4)** 13:8 29:22,23  
 169:25  
**stages (3)** 13:3,5 15:5  
**stamp (1)** 14:10  
**stamps (1)** 151:13  
**standard (2)** 75:12  
 150:16

**start (2)** 156:10 167:5  
**started (4)** 80:9,10,22  
 144:14  
**starting (4)** 50:11 61:10  
 68:24 86:11  
**starts (2)** 62:18 63:15  
**statement (112)** 1:15  
 2:11,13,19,25 3:22  
 8:15,21 9:4,16  
 11:4,6,7 12:25 14:12  
 17:16,17 18:9,23  
 20:21 21:4,9,13,18,24  
 22:5 28:13,16 45:21  
 47:13,24 48:17,20,23  
 49:14,23 50:2  
 51:23,25 52:25 54:16  
 55:20 56:8,9 57:11  
 65:21 66:8,22 67:5,12  
 68:2,7 70:18 71:16  
 74:1 76:6 77:23  
 78:19,22 79:1 84:9  
 86:2 89:3 90:22 93:8  
 94:1 99:21,23  
 100:1,5,9 102:12,15  
 103:6 104:11,18,19,22  
 105:13,23  
 106:13,16,20,22,25  
 107:3,12,15,17  
 108:4,25 109:17  
 117:23 118:9 119:1  
 120:3 125:9,10,15  
 133:25 142:13,24  
 145:24 146:5,10,11,14  
 147:15 163:4,12  
 165:19 170:17  
**statements (3)** 1:7  
 100:21 102:1  
**states (1)** 138:17  
**stating (1)** 154:4  
**stationary (2)** 101:18  
 164:13  
**status (1)** 6:3  
**statutory (1)** 150:14  
**stay (1)** 157:3  
**stayed (1)** 83:1  
**step (4)** 15:14 16:6 20:6  
 22:12  
**steps (8)** 17:15,20  
 18:10 42:25 43:6  
 46:18 49:3,3  
**still (23)** 5:19 26:15  
 36:2 65:17 74:12  
 87:7,8,10  
 88:12,14,17,19 89:22  
 90:11,16 98:2,4  
 110:21 119:10 143:2  
 144:1 163:25 177:18  
**stock (105)** 8:13  
 9:5,6,10,11,23,24  
 10:1,1,10,12,18  
 11:19,20,24,25 12:1  
 13:8,9  
 14:7,13,17,20,21,24  
 15:14,19  
 16:5,8,9,13,17 17:3,10  
 20:9,12,15,22  
 22:13,15 24:19  
 25:18,18 29:2  
 30:4,14,18 33:25  
 34:14 35:16 37:20  
 39:13,16 47:11,15,19  
 48:1,18,25 49:16  
 50:4,5,21 51:1,3,9,20

52:8 53:2,22 60:16  
 61:1,1,12,13 62:5,12  
 63:23 64:18,21  
 65:1,12,23 73:5  
 76:21,22  
 77:3,15,16,18,20,25  
 81:8,8 83:1,11 84:14  
 87:12,17,21,25 88:19  
 89:4,22 135:9  
**stockholding (4)**  
 81:23,25 87:7 88:14  
**stocks (1)** 11:1  
**stole (1)** 26:17  
**stop (7)** 12:4 20:20  
 36:19 91:23 122:12  
 141:2 182:10  
**stopped (1)** 107:10  
**stopping (1)** 94:13  
**stored (1)** 138:4  
**story (1)** 54:22  
**straight (1)** 130:11  
**straightforward (1)**  
 17:18  
**strange (2)** 8:1 117:17  
**strategy (1)** 90:16  
**stress (1)** 90:11  
**strictly (1)** 105:21  
**stuff (6)** 28:23 29:3,9  
 32:21 36:9 65:18  
**subject (3)** 100:2,21  
 150:19  
**submit (1)** 89:14  
**submitted (1)** 185:9  
**subpostmaster (13)**  
 18:7,13 19:23,24 49:2  
 63:8 88:15 93:17 94:3  
 101:9 163:19 173:12  
 182:3  
**subpostmasters (5)**  
 11:19 102:21 103:2  
 112:3 143:18  
**subsequent (1)** 100:3  
**subsequently (4)** 107:7  
 126:25 151:7,9  
**substantial (1)** 179:20  
**succeeded (5)** 30:2,5,22  
 65:2,4  
**successful (6)** 16:24  
 61:2,3,12 64:20 65:24  
**successfully (3)** 15:1,5  
 18:7  
**suffer (1)** 177:16  
**suffered (2)** 55:17,24  
**sufficient (1)** 150:22  
**sufficiently (1)** 2:2  
**suggest (12)** 9:8,10  
 29:20 33:23 34:11,21  
 38:8 74:7 93:23  
 114:18 169:21 170:7  
**suggested (3)** 123:16  
 140:1 184:21  
**suggesting (15)**  
 38:12,17 81:17 125:2  
 126:14 127:9,18  
 131:4,22 174:24  
 176:11 179:18,23  
 181:5,12  
**suggestion (7)** 38:14  
 53:21,25 58:9 119:6  
 130:14,17  
**suggestions (1)** 129:14  
**suggests (3)** 125:11  
 138:20 168:24

**suite (1)** 101:11  
**summarise (2)** 31:21  
 32:10  
**summarises (1)** 147:11  
**summarising (1)** 80:10  
**summary (7)** 31:22  
 78:15 115:12 132:14  
 134:8,9 141:19  
**sunday (1)** 73:8  
**supplemental (2)** 100:5  
 146:11  
**supplied (2)** 10:16,20  
**support (3)** 145:2  
 154:21 156:19  
**supposed (7)** 51:16  
 77:14 88:7,24,25  
 98:12 143:5  
**sure (61)** 18:10  
 19:7,8,9,11,12,16,19,25  
 20:2 21:10 22:22,24  
 23:14  
 24:5,7,9,15,16,19,21,22  
 25:5,7,8 28:6 35:9  
 40:1 43:7 44:13 47:9  
 48:7,13,15 56:2 59:18  
 60:3 65:5 68:9 71:13  
 78:14 89:13 92:12  
 109:13 117:22  
 118:19,20,21,22  
 130:13 131:14 134:25  
 136:12 144:5 146:15  
 150:21 166:18  
 173:12,13 184:7,10  
**surplus (3)** 39:16 87:21  
 169:18  
**surprised (1)** 35:12  
**surprising (1)** 53:25  
**surrounded (1)** 63:3  
**suspicious (2)** 19:13  
 48:4  
**sworn (1)** 1:17  
**system (34)** 13:13,16  
 25:16,21 27:9 28:15  
 36:13 47:2 50:1  
 52:4,11 68:25 69:12  
 71:3 72:18,18,21  
 82:13 92:13 93:13  
 105:2 120:8 127:5  
 131:15,17 133:20  
 135:5,15 136:18  
 137:7,10 167:9,18  
 181:2  
**systems (1)** 63:12

---

**T**

---

**ta (17)** 67:2,3 68:11  
 69:9 73:7 75:10 76:8  
 77:25 80:19  
 81:10,12,16,18,22  
 82:2,12,14  
**tab (15)** 99:20 100:6  
 113:18 132:14,14,22  
 140:20,21,23 155:10  
 163:3 168:3,4 178:7  
 179:9  
**tabassum (7)** 4:9,16,24  
 6:5,21 7:3,14  
**tabs (2)** 132:18,24  
**tahir (1)** 4:25  
**taken (17)** 19:19 23:3  
 24:5,8 51:5 56:14,17  
 69:10 78:1 102:2

105:13 130:15 131:25  
 139:5,10 154:5 169:15  
**takes (3)** 59:11 136:6  
 179:4  
**taking (5)** 20:6 92:4  
 117:6 129:13 156:10  
**takings (1)** 75:16  
**talk (3)** 15:3 37:9 55:21  
**talking (16)** 4:11,13  
**supplemental (2)** 100:5  
 146:11  
**supplied (2)** 10:16,20  
**support (3)** 145:2  
 154:21 156:19  
**supposed (7)** 51:16  
 77:14 88:7,24,25  
 98:12 143:5  
**sure (61)** 18:10  
 19:7,8,9,11,12,16,19,25  
 20:2 21:10 22:22,24  
 23:14  
 24:5,7,9,15,16,19,21,22  
 25:5,7,8 28:6 35:9  
 40:1 43:7 44:13 47:9  
 48:7,13,15 56:2 59:18  
 60:3 65:5 68:9 71:13  
 78:14 89:13 92:12  
 109:13 117:22  
 118:19,20,21,22  
 130:13 131:14 134:25  
 136:12 144:5 146:15  
 150:21 166:18  
 173:12,13 184:7,10  
**surplus (3)** 39:16 87:21  
 169:18  
**surprised (1)** 35:12  
**surprising (1)** 53:25  
**surrounded (1)** 63:3  
**suspicious (2)** 19:13  
 48:4  
**sworn (1)** 1:17  
**system (34)** 13:13,16  
 25:16,21 27:9 28:15  
 36:13 47:2 50:1  
 52:4,11 68:25 69:12  
 71:3 72:18,18,21  
 82:13 92:13 93:13  
 105:2 120:8 127:5  
 131:15,17 133:20  
 135:5,15 136:18  
 137:7,10 167:9,18  
 181:2  
**systems (1)** 63:12

---

**T**

---

**ta (17)** 67:2,3 68:11  
 69:9 73:7 75:10 76:8  
 77:25 80:19  
 81:10,12,16,18,22  
 82:2,12,14  
**tab (15)** 99:20 100:6  
 113:18 132:14,14,22  
 140:20,21,23 155:10  
 163:3 168:3,4 178:7  
 179:9  
**tabassum (7)** 4:9,16,24  
 6:5,21 7:3,14  
**tabs (2)** 132:18,24  
**tahir (1)** 4:25  
**taken (17)** 19:19 23:3  
 24:5,8 51:5 56:14,17  
 69:10 78:1 102:2

23:2,19 26:11  
 27:8,13,19,23  
 28:1,4,6,18 29:16,20  
 30:11 31:2,4  
 32:7,22,23 33:6 34:2  
 35:1,19,22 36:13,18  
 37:22 38:12,16  
 39:11,12 40:23  
 41:10,13 42:14  
 43:12,14,15 45:13  
 46:16,21  
 47:9,16,17,22 49:5,10  
 50:1,14,21 51:5,21,22  
 52:4,5,10 53:5  
 54:17,18 55:8  
 56:2,23 57:20 59:24  
 62:15 63:16 64:14  
 65:7,9,20 67:6,18  
 68:17 69:13,23  
 71:8,17  
 72:8,9,15,20,22  
 75:11,20 76:19 78:8  
 79:4 80:22 82:2,9 83:4  
 85:15,20 87:1,22  
 88:7,10,21,24,25 90:7  
 91:5,22 93:13,18,21  
 95:14 96:9,21,21 98:7  
 99:22 102:17,20  
 103:13,16 105:20,21  
 106:22 108:18 109:2  
 110:25 111:23 118:1  
 120:18 122:12 124:8  
 127:17 130:17 132:11  
 134:8 136:13 139:18  
 142:5,12,23,23,25  
 143:19 144:22  
 147:11,22 149:24  
 152:3 168:13,18  
 170:16,17 172:5  
 174:14 175:12,16  
 178:15 181:22  
 182:6,21 184:2 185:10  
**theft (1)** 19:9  
**thereby (1)** 155:4  
**therefore (2)** 53:23 94:1  
**theres (47)** 2:14 6:4  
 13:18,19 20:23 43:2  
 49:8 50:3 51:16 58:12  
 60:7 65:17 70:16  
 98:11,24 99:24 107:25  
 109:6 113:23 114:25  
 117:20 124:11  
 131:18,19  
 133:11,14,14 136:5  
 143:3 152:22 157:17  
 162:2 163:8 164:7  
 165:4,5,6,11 166:14  
 170:7,23 174:4 176:2  
 180:15,17 181:4,5  
**theyll (1)** 184:10  
**theyre (1)** 31:19  
**thing (15)** 1:9 28:13  
 48:14 51:18 71:23  
 74:25 77:13 78:18  
 85:15 88:25 96:21  
 103:16,19 134:25  
 183:6  
**thinking (3)** 3:20  
 180:7,22  
**third (6)** 3:7,14 4:1  
 145:13 155:1 163:7  
**though (8)** 27:1 57:1  
 145:20 173:3 176:7

177:6,11,25  
**thought (18)** 12:9 44:25  
 45:10 68:8 98:16  
 102:15 106:21,22,22  
 110:14 123:7 124:23  
 128:23 138:16 159:24  
 167:21 173:15 184:14  
**thousand (1)** 53:2  
**threats (1)** 161:4  
**three (15)** 3:8,25 56:14  
 94:14 98:13 102:3  
 107:16 109:1,7 118:17  
 136:23 138:9 159:3  
 178:20,21  
**through (39)** 8:22 13:3  
 15:3,18 17:22,23 18:9  
 20:18 21:14 29:22  
 32:21 33:14 36:10  
 47:8 50:2 56:3,6 66:4  
 70:21,23 77:21 79:7  
 103:8,9,11 108:1  
 111:18 128:14,18  
 133:22 136:6 139:10  
 144:22 158:15,25  
 167:22 170:13 177:24  
 182:4  
**throughout (1)** 69:14  
**thursday (2)** 91:18  
 184:24  
**ticket (1)** 69:6  
**tightly (1)** 29:18  
**till (7)** 60:16 69:13  
 80:17 89:5 123:20  
 128:22 159:19  
**tills (2)** 69:12 164:5  
**time (56)** 7:15,23 14:6  
 20:19 21:12 22:16  
 26:13 31:5 40:14  
 51:12 54:16 61:25  
 62:5 65:18,19 72:25  
 76:11 82:14 83:10,12  
 84:24 85:1.1 98:6,9,15  
 104:1,2 109:6 110:9  
 114:2,3,7 128:23  
 131:2,6 135:1 137:9  
 141:12 150:3 152:15  
 154:18 159:24 162:16  
 163:20 165:4 166:5  
 167:14,24,25 169:6  
 174:19,22  
 185:13,17,18  
**timed (1)** 62:14  
**times (8)** 8:2 35:7 54:6  
 65:19 111:12 155:20  
 179:12 180:12  
**timing (3)** 83:17 98:12  
 145:23  
**tl (2)** 34:19,21  
**today (3)** 95:24 98:13  
 162:9  
**together (5)** 62:1,19  
 74:19 100:22 118:2  
**told (28)** 6:1 27:20  
 28:18 30:5 33:25  
 34:25 37:25 69:23,24  
 70:11 71:6,10  
 73:18,24 74:20 75:5  
 76:2 89:9 110:5  
 119:25 124:3 129:3  
 154:17 160:7,19  
 173:11 179:12 181:18  
**tomorrow (4)**  
 182:11,14,24 185:24

**tonight (1)** 185:23  
**too (4)** 22:1 65:24  
 112:16 117:6  
**took (7)** 47:18 71:1  
 109:1 154:4 161:17  
 164:6 167:6  
**total (6)** 128:18 157:21  
 159:11 164:20 171:14  
 172:13  
**totalling (1)** 151:6  
**touch (1)** 37:3  
**towards (2)** 11:10 45:3  
**trail (1)** 90:19  
**train (1)** 31:15  
**trained (7)** 7:3 18:6  
 27:13,25 43:18 46:17  
 87:6  
**trainer (1)** 31:15  
**training (5)** 7:8 18:2,6  
 27:21 54:21  
**tran (1)** 33:20  
**transaction (121)** 17:9  
 20:25 21:20 23:11  
 24:2 34:2,21 38:2,7  
 41:21 43:11 46:15,24  
 48:6 56:17,23,25  
 57:4,6,8,13 58:8,23  
 60:24 63:11,16  
 66:15,15,20,23,25  
 67:1,2,3,3,18 68:11,15  
 69:5,9,17 70:8,22  
 73:1,3,6,6 74:12  
 75:15,25  
 76:5,13,18,24  
 77:2,10,21 79:6 80:25  
 81:2,4,22 82:5,24  
 87:24 88:4,5,22  
 89:15,16 90:1,2,20  
 92:10 109:24  
 113:20,23 116:2  
 118:14,22  
 119:3,3,11,17,20  
 120:15 123:24  
 124:5,20 125:13  
 127:1,4 128:14,25  
 129:1,19,25 130:5,6  
 131:8,24 134:15  
 135:18 139:15 141:20  
 142:7 143:19 144:19  
 145:5,11,15 147:9  
 155:24 158:25 160:1,2  
 161:7,10 169:8  
 179:10,14  
**transactions (11)** 63:9  
 69:8 90:8 101:15  
 102:8 120:8 121:15  
 135:15 154:4,5 179:21  
**transcribed (1)** 36:22  
**transcribers (4)** 35:24  
 84:2 153:15 162:6  
**transcript (10)** 23:22  
 24:25 38:24 54:25  
 55:8 61:24 94:19,21  
 114:23 153:12  
**transfer (103)** 8:14 9:5  
 10:24 11:23  
 13:9,10,13  
 14:1,3,5,7,11,13,18  
 16:2,16,18,23  
 17:4,7,10,20,21  
 18:15,18 19:3  
 20:5,9,15,17,22,25  
 21:1,6 22:13,14,14

30:2,5,9,10,11,21,22  
 31:6,7 35:16 36:7,8,9  
 37:20 38:9,13  
 39:4,17,25 40:7 45:23  
 47:8,18 48:3,6,10,12  
 49:14,18 50:20,24  
 52:12 56:21,21 60:5  
 61:8,12,13,15,19  
 62:3,11,18 63:2,3,5,24  
 64:17,19,20  
 65:3,3,6,6,11,12,14,15,16  
 66:7 121:6,12  
**transferred (7)** 11:21,22  
 12:2 14:25 15:4 33:14  
 47:16  
**transfers (25)** 15:19  
 29:8,8 33:20,25  
 34:13,19,25 56:19,20  
 57:24 58:10  
 59:1,1,6,6,15 60:12,25  
 61:6,7 63:4,6 64:25  
 65:23  
**transmitted (1)** 69:6  
**travel (2)** 41:16 44:8  
**treats (1)** 135:15  
**trial (6)** 46:19 83:13  
 139:1 149:10,15  
 150:16  
**tried (8)** 20:15 110:9  
 117:22 118:1 126:25  
 152:15 156:13 167:21  
**trip (1)** 118:4  
**trouble (1)** 122:8  
**true (8)** 2:19 9:1 76:6  
 100:2,22 108:7 143:19  
 163:13  
**trust (2)** 7:13 115:20  
**trusted (3)** 7:13 26:20  
 27:5  
**trustworthy (1)** 7:16  
**truth (1)** 35:16  
**try (8)** 29:12 31:21  
 112:2 115:23 128:23  
 129:13 159:24 185:18  
**trying (12)** 6:21 32:9  
 50:3 53:5 94:21 95:19  
 107:4 118:4,5,24  
 177:20,23  
**tuesday (2)** 1:1 69:8  
**tune (2)** 123:25 124:21  
**turn (9)** 56:7 78:25  
 90:21 99:20 102:10  
 107:21 125:6 163:3,7  
**turned (5)** 11:13 12:16  
 86:13 111:24 124:3  
**turnover (1)** 101:14  
**twice (13)** 7:21 51:15  
 67:9 69:22 70:23,23  
 71:9 76:6 77:25  
 81:19,22,23 82:15  
**twocounter (1)** 101:10  
**type (5)** 58:19 113:14  
 133:5 146:23 171:9  
**typically (3)** 3:24 5:21  
 121:13  
**typing (1)** 36:24  
**typo (1)** 9:21  
**typographical (1)** 66:22

**unable (3)** 95:22  
 118:15,23  
**unavailable (1)** 135:1  
**unclear (1)** 9:15  
**uncommon (2)** 8:7  
 166:14  
**underlying (2)** 57:13  
 58:8  
**understand (34)** 6:16  
 9:3 15:25 16:22 22:2  
 16:36,25,48,53 48:18  
 58:21 60:6 74:3 75:13  
 78:13 104:24 108:2  
 109:12,14 112:13  
 117:12 118:5 120:18  
 123:6 124:10 125:2  
 129:21 148:6 149:18  
 152:7 154:9 155:2  
 170:18 180:10,25  
 185:11  
**understandable (5)**  
 116:7 124:12 126:15  
 143:22 176:15  
**understandably (2)**  
 125:24 127:11  
**understanding (3)**  
 53:15 119:5,6  
**understood (3)** 12:10  
 37:10 75:2  
**undertake (2)** 121:14  
 154:2  
**undertaken (1)** 151:6  
**undertaking (2)** 151:15  
 152:2  
**undertook (1)** 165:22  
**undo (1)** 88:9  
**uneasy (1)** 91:25  
**unexplained (10)**  
 112:16,23 116:15  
 124:8 126:11  
 127:9,10,14,18,22  
**unfiltered (1)** 96:4  
**unhelpful (1)** 78:5  
**unit (73)** 8:14  
 9:5,6,10,11,24  
 10:1,1,10,12 11:24,25  
 12:2 13:8,10  
 14:7,13,17,21,21,25  
 15:15,19  
 16:5,9,9,13,17 17:4,10  
 20:9,12,16,23  
 22:13,15 24:19 25:18  
 29:2 30:4,18 37:20  
 39:14,16 47:11,15,19  
 48:1,18,25 49:16  
 50:4,21 51:1,3,9,20  
 52:8 53:2,22 60:16  
 61:1,1,12,13 62:1,5,13  
 63:23 64:18 65:13  
 73:5 135:9  
**units (10)** 9:24 11:20  
 30:14 33:14,25 34:14  
 35:16 64:21 65:1,23  
**unless (5)** 2:3 39:17  
 129:4 160:8 174:21  
**unreconciled (1)** 30:9  
**until (13)** 22:11 35:13  
 83:11 84:1 85:7,16  
 97:16 124:19  
 162:14,17 182:10  
 184:5 186:2  
**untoward (7)** 19:13,25  
 20:3 24:7,23 25:5,7

**used (11)** 6:8,9 7:12  
 13:9 102:16 103:1  
 151:14 152:1 154:5  
 172:25 182:2  
**useful (4)** 11:4 39:22  
 61:24 129:14  
**user (16)** 5:4,7,8,11  
 11:22 29:6 37:25 47:3  
 61:15,16 64:5 114:6  
 123:17 124:12 125:3  
 143:9  
**username (1)** 103:11  
**uses (1)** 71:3  
**using (7)** 11:23 33:20  
 37:25 59:4 95:20  
 155:25 178:17  
**usual (3)** 127:13 166:1  
 185:20  
**usually (5)** 36:25 43:9  
 84:24 147:2,2

---

**V**

---

**v (1)** 173:11  
**vague (1)** 68:20  
**vaguest (1)** 148:6  
**value (7)** 63:5,24 80:12  
 155:4,5 179:20 180:23  
**van (32)** 11:5  
 56:8,14,22 57:9 60:23  
 65:21 78:25 79:19  
 80:8 81:21 82:4 83:7  
 84:9 86:1,22 87:3,14  
 88:11 100:9 102:14  
 106:15 107:12,17  
 116:9 118:9 125:9,18  
 133:25 146:2 147:14  
 169:3  
**variance (2)** 46:10,18  
**various (12)** 7:7,9 43:2  
 60:12 106:18 111:13  
 116:16 117:24 133:22  
 148:11 156:13 177:24  
**vehicle (1)** 120:20  
**versa (1)** 165:11  
**version (6)** 58:25 59:3  
 96:7 138:17,18 157:11  
**via (1)** 11:22  
**vice (1)** 165:11  
**videolink (2)** 85:14 98:7  
**viewed (1)** 120:1  
**viewing (1)** 120:6  
**views (1)** 98:19  
**village (1)** 3:6  
**visible (2)** 63:7,11  
**visiting (1)** 107:11  
**voce (1)** 12:8  
**voice (2)** 15:11 58:4

---

**W**

---

**wait (3)** 2:21 22:11  
 163:15  
**waiting (1)** 1:5  
**walked (2)** 14:20 16:9  
**wants (2)** 165:1,14  
**warned (1)** 154:14  
**warning (4)** 149:11,16  
 150:10,14  
**wasnt (21)** 19:12 64:7  
 105:14 106:14,20  
 118:14 119:18,20  
 120:6,16 121:22  
 140:11 144:4

152:19,19 156:19,25  
 161:12 167:9,9 181:24  
**way (31)** 3:2 27:6 50:2  
 53:24 60:9,11 62:2  
 68:25 70:16 83:12  
 104:20 108:2 118:21  
 120:9,9 121:22  
 127:21,25 131:17  
 144:24 145:4 146:20  
 152:13,17 153:1,1  
 156:11 169:20,21  
 170:19  
**ways (2)** 78:4 111:13  
**website (2)** 41:9,10  
**wednesday (10)** 7:1  
 27:12 46:6 53:10 69:8  
 98:22 166:12 174:18  
 184:24 186:2  
**week (11)** 5:21,22,24  
 7:21,21,23 35:7,14  
 144:7 184:5,21  
**weekly (1)** 6:25  
**weeks (6)** 57:17 68:5  
 102:13 107:9,19 185:7  
**wellknown (2)**  
 102:23,24  
**went (17)** 15:17,18 17:3  
 18:4 49:16 78:7 82:1  
 105:21 108:15 111:21  
 117:23 123:20 127:16  
 131:17 144:20  
 167:12,17  
**werent (5)** 8:3 111:2  
 148:8,12 152:14  
**weve (3)** 43:24 44:14  
 145:23  
**whatever (3)** 127:2  
 145:1 176:12  
**whats (12)** 30:25 31:1  
 47:4 48:8 54:13 65:4,4  
 77:14 83:10 88:18  
 104:24 172:25  
**whenever (2)** 103:24  
 165:8  
**whereabouts (1)** 96:5  
**whereas (1)** 110:14  
**whichever (1)** 141:1  
**whoever (3)** 73:11  
 75:14 76:8  
**whole (4)** 104:21  
 119:16 156:16 158:12  
**whose (1)** 71:12  
**whosoever (1)** 178:22  
**wife (7)** 101:24 164:17  
 165:7,9 166:5 167:16  
 182:23  
**wish (2)** 11:19 150:20  
**wishes (1)** 2:3  
**withdraw (1)** 91:18  
**withdrawal (11)** 109:24  
 120:12,22,24 121:15  
 122:14 126:23 128:13  
 141:8 142:4 179:14  
**withdrawing (1)** 92:3  
**withdrawn (1)** 121:16  
**witness (97)**  
 1:6,15,18,24  
 2:11,13,18,25 8:15,21  
 9:4 11:7 12:8,24  
 17:16,17 18:23 21:4,9  
 28:13,16 45:14,21  
 47:13,24 48:16,20,23  
 49:13,23 51:24 52:25

55:20 56:8 57:11  
 59:20 60:1 66:8,22  
 68:7 70:18 71:16  
 78:20 79:1,13 86:1  
 89:2 90:22 93:8  
 94:1,14 98:15  
 99:4,17,21,23 100:9  
 102:1,12 103:6  
 104:11,18,19  
 106:13,20,21,25 107:3  
 108:4,25 109:17  
 117:23 119:1 120:3  
 123:5 125:9,15 130:19  
 142:12,23 145:24  
 146:5,10,11,14 147:15  
 149:8,23 150:7  
 162:2,6 163:4 165:19  
 170:16 183:11  
**witnesses (4)** 11:5  
 98:13,14 149:10  
**wonder (1)** 86:4  
**wondering (3)** 105:8  
 106:12 123:23  
**wont (5)** 58:23 59:22  
 133:21 169:15 185:3  
**work (24)** 5:21,24 6:8  
 7:12 65:20 75:23  
 76:25 77:1,7,13,24  
 78:4,12,14 83:1 111:2  
 164:15,25 165:16  
 168:10,11 169:16  
 177:9 184:25  
**worked (13)** 5:22  
 14:14,14 18:1 27:5  
 65:9,9 77:11 78:6  
 87:12 164:17,18  
 182:22  
**working (11)** 3:24 7:16  
 8:2 71:11 75:10 143:5  
 158:13,21 159:22  
 192:16 195:16  
**works (11)** 10:15 27:9  
 47:2,4 65:7,8,19 68:25  
 75:24 78:10 145:4  
**world (1)** 58:4  
**worry (1)** 45:9  
**worst (1)** 169:12  
**worth (10)** 10:20 50:15  
 77:5,6 173:4 174:1,4,6  
 175:18 176:2  
**wouldnt (28)** 6:15,20  
 19:2 25:25 26:4 39:16  
 43:22 46:12,21 52:24  
 54:1 63:7,10 81:2  
 125:4 126:9 141:11  
 147:5 152:25 156:22  
 159:5 171:24 172:2  
 174:20 178:4  
**write (1)** 113:3  
**writers (1)** 85:13  
**written (1)** 124:25  
**wrong (33)** 26:22,24  
 27:1 29:20 31:12 32:9  
 36:15 42:4,5 43:1,5,6  
 48:4,13 52:12 66:8,16  
 89:4,5 92:2,10 106:19  
 124:15 127:16 138:16  
 140:17,18 143:3,6  
 146:21 147:20 154:9  
 180:9  
**wrongly (1)** 77:3

wrote (1) 125:1

---

**X**

---

x (4) 53:2,3 96:16  
155:18

---

**Y**

---

yahoo (1) 158:10  
year (5) 87:6 93:18  
109:7,8 123:25  
years (10) 18:1,8 27:4  
31:18 75:9 109:2  
110:17 124:1,21,25  
yellow (1) 141:15  
yesterday (4) 128:10  
141:8 158:19 183:7  
yesterdays (1) 75:15  
yet (3) 1:18 80:2 130:4  
youre (14) 14:12 31:2  
38:16 50:3 51:19 54:6  
60:6 65:6 78:8 79:11  
81:12,21 118:21 153:2  
yourself (12) 11:15  
12:7,14 79:3,22,25  
84:8 86:4,23 134:1  
152:18 156:24  
youve (4) 4:14 29:4  
31:17 179:19

---

**Z**

---

zero (3) 83:4 126:24  
130:9  
zone (1) 84:24

---

**0**

---

001 (1) 5:17  
0561347 (1) 97:3

---

**1**

---

1 (13) 83:9 94:2 108:6  
112:8 132:25,25  
135:8,9,9 140:25  
174:5 178:7 187:4  
10 (28) 71:16  
72:5,10,14 73:10,18  
74:22,22 75:5,20 81:9  
85:2 96:16 97:7  
155:18 162:14,17  
174:1,5,7  
175:13,14,19,21,23  
176:3,4,14  
100 (7) 86:5 96:16  
97:9,10 111:11 151:6  
187:11  
1000 (9) 76:22 77:6,24  
78:7 91:18,22 92:4,6  
174:5  
10000 (2) 16:16,18  
100s (1) 156:17  
101 (3) 86:11,17 87:16  
102 (1) 86:22  
10234 (1) 157:22  
1030 (3) 1:2 182:25  
186:2  
10th (1) 175:23  
11 (22) 40:24 76:12,20  
100:6 165:20,23  
172:5,9,16,20  
173:21,23

174:12,16,18  
175:19,21,22,25  
176:9,13 177:1  
110 (1) 85:21  
1100 (1) 97:7  
1137 (1) 37:15  
113821 (1) 171:17  
1145 (1) 37:17  
114919 (1) 63:24  
115 (1) 85:23  
115030 (1) 64:19  
11676 (3) 113:14,18  
122:7  
1174 (1) 42:12  
11874 (1) 42:11  
11th (2) 174:25 175:24  
12 (5) 1:1 166:7  
174:13,17 176:17  
120 (3) 140:16,25 141:2  
12000 (1) 3:7  
12571 (1) 112:10  
12574 (1) 122:2  
12575 (1) 132:11  
12621 (1) 113:3  
12861 (1) 140:19  
12th (1) 175:1  
13 (6) 27:4 92:22 125:7  
128:8 176:25 186:3  
130 (1) 92:22  
1335 (1) 141:23  
1339 (1) 133:6  
1340 (1) 133:11  
135222 (1) 62:8  
135501 (1) 62:14  
136 (1) 172:17  
13991 (1) 153:19  
14 (2) 141:17 153:19  
140 (1) 99:11  
1402 (1) 133:15  
14515 (2) 172:6,8  
15 (12) 79:14  
83:19,20,21 84:20  
90:22 94:20,24 110:24  
148:17 151:5 184:3  
15071 (1) 171:6  
157 (1) 187:12  
16 (5) 25:16,20 107:13  
109:2 112:17  
16000 (9) 172:24  
173:4,8 174:1,5,6  
175:18,23,24  
16070 (1) 175:16  
162 (1) 187:13  
163 (2) 187:14,15  
167 (3) 96:6,8,9  
17 (4) 18:1,8 75:9  
112:17  
17000 (8) 169:23  
170:9,20 171:2,21  
172:23 177:1,5  
172 (1) 91:13  
1728 (2) 178:10 179:13  
17339 (1) 172:14  
1735 (1) 178:11  
175 (1) 178:11  
18 (3) 80:11 90:22  
110:24  
182 (1) 92:20  
18291 (2) 95:3,10  
183 (1) 187:16  
18351 (1) 61:10  
18352 (3) 61:8 62:4  
63:1  
18359 (3) 61:10 62:11

63:1  
19 (2) 57:23 58:7  
195 (4) 118:15 119:8  
126:23 160:16  
19504 (17) 100:13  
102:6 106:14 114:11  
116:8 118:8 119:2  
125:7,13 126:17 127:3  
129:1 140:4 141:8  
142:2 159:11 160:2

---

**2**

---

2 (13) 45:4,15 98:11  
99:3,10 100:8  
136:13,19,21 141:15  
151:9 187:5,6  
20 (9) 34:8 36:23 79:14  
83:19,20,21 84:21  
174:4 183:22  
200 (5) 126:1,14 127:10  
144:20 159:20  
2000 (56) 8:14 10:24  
13:10 14:25 15:22  
17:1,7 19:5,11,17,19  
22:20 23:3 24:5,13  
27:16 38:14 45:22  
47:1,10,15,19 48:18  
49:18,24 50:1,4,20  
51:1,10,12  
52:9,15,15,20 53:4,7  
54:8 55:17,24  
56:19,20 58:10  
59:16,25 60:5,25  
61:12 62:8,14 63:24  
64:25 65:23 91:19  
92:7,15  
20000 (1) 128:22  
2006 (1) 18:4  
2007 (1) 145:25  
2008 (1) 116:16  
2010 (1) 109:1  
20102011 (4) 108:11  
110:15 125:12 140:3  
2011 (8) 100:14,19  
109:1 118:7 125:7  
128:8 141:17 146:6  
2014 (12) 33:4,23 45:5  
100:17 109:2,21  
116:17 117:1,7,15,20  
163:20  
2015 (32) 3:20 8:16  
10:25 34:8 38:4,10,14  
40:18,24 41:1 44:10  
45:5 46:3,24 54:9 58:9  
60:25 62:13 63:23  
64:18,25 65:22 95:6  
148:12,14  
151:5,5,8,9,10  
157:11,16  
2016 (9) 45:4,15 107:10  
148:17 163:21 165:20  
167:6 171:13 172:20  
2018 (15) 3:21 66:20  
67:13,13 68:15 76:16  
80:11 88:13 89:16  
91:15 96:9 98:2,20  
107:13 108:5  
2019 (3) 1:1 107:16  
186:3  
21 (1) 62:13  
21072015 (1) 62:10  
215 (1) 99:13  
216 (1) 155:10

22 (3) 11:9 95:15  
133:14  
22130 (2) 175:21 176:2  
23 (1) 151:8  
2336 (2) 178:7,9  
2337 (1) 178:9  
24 (1) 115:17  
25 (5) 79:1,2 96:9 151:5  
154:1  
25988 (3) 62:18  
63:15,23  
25990 (2) 64:3,17  
26 (1) 91:15  
26000 (1) 174:4  
266 (1) 79:19  
267 (3) 79:21,25 80:3  
26th (1) 93:24  
27 (3) 93:21 107:16  
151:10  
28 (1) 108:5  
29 (4) 40:18 63:23  
64:18 95:6

---

**3**

---

3 (9) 2:13 99:23 128:15  
135:6 137:1,20 138:21  
159:1 163:3  
300 (1) 179:14  
31 (1) 116:12  
310 (1) 155:16  
32000 (1) 175:23  
344 (1) 162:19  
352 (1) 162:21  
35700 (1) 176:5  
36 (1) 5:24  
37650 (1) 176:4  
383 (1) 175:8  
384 (1) 175:8  
385 (1) 175:8

---

**4**

---

4 (6) 115:17 116:23  
137:5 162:14,15,17  
40 (4) 85:6 94:20,24  
166:24  
4171 (1) 114:20  
42 (1) 169:5  
4253 (1) 114:22  
430 (1) 181:15  
4323 (3) 179:10,13,15  
434 (2) 155:18,19  
435 (1) 186:1  
4457 (1) 114:20  
45 (2) 85:6 169:5  
4500 (1) 174:5  
46500 (1) 172:24  
47 (4) 168:5,5,14,15  
48 (1) 185:20  
48021 (1) 171:14  
49 (2) 33:2,7

---

**5**

---

5 (6) 36:25 83:9 116:11  
138:17 148:14 174:5  
50 (3) 77:5 96:17  
166:24  
500 (2) 77:5 151:8  
52000odd (1) 179:1  
53 (1) 134:1  
530 (1) 10:5

**6**

---

6 (12) 9:4,17 14:12  
35:6,13 85:2 99:20  
105:24 106:9 108:8  
112:8,10  
60 (1) 166:24  
600 (27) 100:16 102:4  
108:20,21 109:16,25  
110:3 111:6  
113:7,20,24 116:1,23  
117:8,14  
119:3,8,11,18  
120:15,23 122:14  
124:5,6,22 125:11  
139:24  
660 (5) 113:4 116:17  
117:2,15,19  
68000odd (1) 178:25

---

**7**

---

7 (4) 12:25 18:23 47:14  
139:19  
70 (2) 34:4,6  
71000odd (1) 172:13

---

**8**

---

8 (2) 50:12 184:22  
8000 (1) 16:19  
82 (1) 147:14  
822 (1) 168:18  
87 (3) 11:10,12,14  
8711 (1) 132:7  
88 (3) 11:10,12 12:15  
89 (4) 40:17,17 41:5  
95:5  
8th (2) 184:19,24

---

**9**

---

9 (18) 10:5 35:7,14 67:5  
68:20,24 69:16 72:13  
73:2,17 75:4 110:21  
167:6 170:1,4  
171:1,13 184:22  
90 (2) 41:13 56:9  
900 (1) 151:6  
91 (2) 41:16 56:9  
92 (1) 41:19  
93 (1) 41:21  
94 (2) 41:24 187:7  
95 (3) 42:1,3 95:14  
96 (1) 44:4  
97 (3) 40:22 44:8 187:8  
98 (2) 80:7 86:1  
99 (7) 83:6,15 84:5,8  
86:1 187:9,10  
9th (2) 184:19,24