



CITY OF WESTMINSTER

MINUTES

Licensing Sub-Committee (6)

MINUTES OF PROCEEDINGS

Minutes of a meeting of the **Licensing Sub-Committee (6)** held on **Wednesday 10th April, 2019**, Rooms 18.01 & 18.03, 18th Floor, 64 Victoria Street, London, SW1E 6QP.

Members Present: Councillors Melvyn Caplan, Councillor Jim Glen and Councillor Shamim Talukder

Apologies for Absence: None.

1 MEMBERSHIP

1.1 Councillor Tim Mitchell replaced Councillors Louise Hyams and Aziz Toki for the items Regent's University London, Regent's College, Inner Circle, Regent's Park and Pappiland Café, Ground Floor, 12 Norfolk Place, W2.

2 DECLARATIONS OF INTEREST

2.1 No declarations were made.

1 SOPHISTICATS, 77 WELBECK STREET, LONDON, W1G 9BN

LICENSING SUB-COMMITTEE No. 6

Wednesday 10th April 2019

Membership: Councillor Melvyn Caplan (Chairman),
Councillor Jim Glen and Councillor Shamim Talukder

Legal Adviser: Barry Panto
Committee Officer: Andrew Palmer
Presenting Officers: Michelle Steward
Daisy Gadd

Objections: The Licensing Authority, 1 anonymous objection
and Mr Simon Warr

Present: Michael Bromley-Martin QC (Leading Counsel, representing the Applicant), Mr Jack Spiegler and Mr Thomas O'Maoleoin (Solicitors, representing the Applicant), Mr John McKeown (on behalf of the Applicant company), Mr Dominic D'Souza (Counsel, representing Mr Simon Warr), Ms Lana Tricker (Solicitor, representing Mr Simon Warr), Mr Simon Warr (Objector), Mr Tony Nash (Investigative Consultant on behalf of Mr Warr), and Ms Roxsana Haq and Mr James Hayes (Licensing Authority).

Sophisticats, 77 Welbeck Street, London, W1G 9BN (“The Premises”) 18/11062/LISEVR	
1.	Renewal of a Sexual Entertainment Venue (SEV) Premises Licence
	<p>The application was to renew the Sexual Entertainment Venue (SEV) premises licence made by Mondrealm Ltd. It was noted that the licence had since been transferred to John McKeown Clubs Ltd.</p> <p>The application was initially due to be heard on 26 February 2019 and following a detailed discussion it was agreed that this was adjourned until a later date. This was partly to allow the applicant to be able to properly respond to some of the allegations that had been made by Mr Warr and which had only been served on the applicant by the licensing authority a few days before the hearing.</p>
2.	Amendments to application advised at hearing:
	<p>Late submissions were received from the applicant's solicitors on 5th and 8th April in the form of a report on back linking, a witness statement dated 5th April 2019 in the name of John McKeown and a response from the licensing inspectorate (dated 6th April 2019) to a Freedom of Information request.</p> <p>Late submissions were also received from one of the objectors.</p> <p>Before the Hearing commenced, the representatives for the Applicant and Mr Warr discussed the order of submissions with the Sub-Committee, and agreed that as both parties were fully aware of the objections that had been made, the Applicant would make his case to the Sub-Committee first followed by Mr Warr.</p>
	<p>Decision (including reasons if different from those set out in report):</p> <p>The Sub-Committee heard the Applicant's Case</p> <p>Mr Bromley-Martin addressed the Sub-Committee on behalf of the Applicant and asked that two further documents be taken into account. These comprised of a short one-page second statement from the Applicant; and a schedule. Mr Bromley-Martin explained that it had not been possible to submit the statement prior to the hearing, as it referred to information contained in the response to the Freedom of Information request which had only recently been received. The schedule referred to information that had already been provided. Mr D'Souza responded on behalf of Mr Warr, and commented that dates and chronology concerning a former employee of Platinum Lace were not admitted. Mr Bromley-Martin also requested that the applications for the renewal of the sexual</p>

entertainment venue premises licences at 3-7 Brewer Street and 77 Welbeck Street be dealt with at the same time, and that 3-7 Brewer Street be dealt with first as the submissions could be seen to apply more to Brewer Street than Welbeck Street.

There was no objection to the approach suggested by Mr Bromley-Martin from either the objectors present or the members of the Licensing Sub-Committee.

Mr Bromley-Martin considered that the principal objection to the application had related to the suitability of Mr McKeown as Applicant and confirmed that he would be seeking to address this. Mr D'Souza agreed that the suitability of Mr McKeown and Mr Simon Langer as effectively sole shareholders and directors would be brought into question. Mr D'Souza also commented that there may be an issue to consider regarding renewal.

As Legal Advisor to the Sub-Committee, Mr Panto confirmed that the SEV licences in respect of 3-7 Brewer Street and 77 Welbeck Street had both been transferred to John McKeown Clubs Ltd, with Mr McKeown as sole Director. Mr D'Souza commented that Mr Warr could make separate submissions later in the hearing concerning who in truth was benefitting from the licence or renewal applications. Mr Bromley-Martin confirmed that although Mr Simon Langer had formerly been a joint owner with Mr McKeown, he had not been involved in Sophisticats since March 2018, and was accordingly not at the hearing.

The Sub-Committee asked why the application for 77 Welbeck Street was continuing while the premises were closed and being redeveloped. Mr Bromley-Martin confirmed that trade at 77 Welbeck Street would need to start as soon as the redevelopment had been completed.

Mr Bromley-Martin referred to the objections made which related to 77 Welbeck Street, and noted that the first objection had been from the Licensing Authority; the second had related to 'back linking' to the Sophisticats website; and the third to Mr Warr's objection that Mr Bromley-Martin would comment on in due course.

With regard to 3-7 Brewer Street, the first objection had again been from the Licensing Authority and had referred to the CCTV at the premises, which was comprehensive with all areas being monitored and particular attention being given to the private dancing areas. Mr Bromley-Martin suggested that much of the physical contact seen in CCTV recordings had been instigated by the customer, with the performer taking action to stop the contact. When the performer had not properly responded, the CCTV had shown that the Premises Manager had carried out supervision and then had discussions with the performer. Mr Bromley-Martin commented that although the Licensing Authority had reported that some physical contact had occurred, the CCTV had not appeared to show that it had been knowingly in contravention of the conditions attached to the Licence. CCTV recordings and the incident log had again been reviewed on two subsequent unannounced visits, which had each found the premises to be well run and operating in accordance with the conditions of the licence. Mr Bromley-Martin commented that the premises had never been found in breach of any of the Licence conditions.

Mr Bromley-Martin referred to the objections made in relation to 3-7 Brewer Street, and would explain that the anonymous objection made in connection with a 'Back to School' promotion by Sophisticats had been made through a misunderstanding; and that an objection to what had been claimed to be touting had also been insubstantial. He would also comment on the anonymous objection relating to backlinking, which he believed to be linked with Mr Warr who was the operator of Platinum Lace and other premises across the country. Mr Bromley-Martin indicated that the applicants thought that the objection had been made by an individual that was named at the Sub-Committee but was later advised that this objection had actually been made by someone else.

Mr Bromley-Martin suggested that the objections made by Mr D'Souza on behalf of Mr Warr had been immoderate and repetitive and had made a series of allegations that aimed to set out alleged criminal conduct on the part of Mr McKeown and Mr Langer. He questioned whether some of the alleged offences set out on page 148 of the report were offences at all. He also suggested that the Sub-Committee might consider how it should respond to the suggestion that it had been misled by alleged fraudulent objections that had allegedly been made by Sophisticats to the renewal of the licence for Platinum Lace.

The Chairman reminded the hearing that the Licensing Sub-Committee was not a criminal court, and that part of the reason for hearing the objectors first was that the details of concerns that had been raised could be obtained at an early stage. The duties of the Sub-Committee related to the appropriate licencing rules and regulations, and the decision on whether to grant the licence or not would be made on that basis. Although the Sub-Committee would be very tolerant in terms of what was said, any arguments relating to criminal acts would not be heard, and it would make no comment on alleged criminality at any time during the hearing.

For clarification and the avoidance of any doubt, Mr Panto commented that it was not the function of the Licensing Sub-Committee to determine criminal liability. However, he also advised that it was important to place on record that the Sub-Committee would not prevent the allegations being made as to the suitability of the applicant or the motives for those allegations being made.

Mr Bromley-Martin suggested that the objections from Mr Warr had been made in response to the breaches of licensing conditions at his premises Platinum Lace, which was also a sexual entertainment venue. In his witness statement, Mr McKeown had confirmed that in 2015, his then partner Mr Langer had arranged for an article to be placed in several newspapers setting out concerns over breaches of the operators' licence at Platinum Lace. Although Mr McKeown had also instructed witnesses to visit Platinum Lace, and subsequently provided evidence to the City Council, he had not submitted an objection to the renewal the licence and the application had been granted. In 2016, Mr McKeown had again instructed witnesses to visit Platinum Lace to provide evidence for the City Council but had not objected to the licence renewal.

Mr Bromley-Martin referred to the supplementary schedule which set out comparative compliance between Platinum Lace and Sophisticats and highlighted the incidents at Platinum Lace which had been witnessed by the

Licensing Authority in 2015. These had indicated a breach of the no-touching condition; no CCTV coverage in booths; and complacent supervision. Action taken had included an upgrade of CCTV; the suspension of the head supervisor; and improved supervision in booths. Although Mr Bromley-Martin could not be specific about the application for renewal of the licence for Platinum Lace in 2017, he could confirm that Mr McKeown had not been involved in the renewal in 2018.

Mr Bromley-Martin informed the Sub-Committee that Mr McKeown was concerned that widespread breaches of Licence conditions in the industry were contributing to an expectation among customers that physical contact in a performance during relevant entertainment was permitted. This resulted in a risk of conflict, compromise and breaches of conditions when customers visited a compliant sexual entertainment venue; and of more concern, compromised the safety of women who worked in these establishments. He suggested that the alleged breaches of conditions at Platinum Lace had not been highlighted by Mr McKeown for commercial reasons or to do harm to Mr Ward's business, but had been done out of public interest and a genuine concern over the way the industry was heading. He acknowledged that Mr McKeown's motives had not been wholly altruistic and were to his advantage on some levels, as he had his own business to protect and wished to remain in the industry. Mr McKeown would not condone the abuse of performers, which was something he had not tolerated in his own clubs. Premises that permitted physical contact could also gain a commercial advantage to the detriment of others which were compliant to license conditions.

Mr Bromley-Martin referred to Mr Warr's statement, and suggested that the submission from Mr Nash, who was a retired policeman, had expressed the view that Mr McKeown's motivation had been to damage Mr Warr as a competitor. Similarly, although Mr Warr had suggested that the information given in the newspaper articles had been fabricated and had misled the Sub-Committee, each of the matters raised had been supported by other evidence from the licensing authority itself. Similar evidence had also resulted in the licensing authority refusing to renew the licence for the Windmill.

Mr Bromley-Martin noted that a statement from Tony Nash had also referred to Mr Langer's wife and ongoing divorce proceedings and questioned the legitimacy of her submissions in view of her having being arrested by the police and cautioned for assault on Mr Langer. Mr Bromley-Martin confirmed that if Mrs Langer's statement was to be used, she would have been asked to attend the hearing to give evidence and answer questions. The Chairman reminded all parties that members of the Sub-Committee had read the papers, and that objectors could not be compelled to attend as the hearing was not a court of law.

Mr Bromley-Martin stated that it was difficult for Mr McKeown to make any judgements on the emails and text messages that had allegedly been sent by and received from Simon Langer and on which emphasis was made by Mr Warr and Mr Nash. He was of the view that they did not indicate anything more than ordinary negotiations with a freelance journalist and Mr Langer to get information for the newspaper article about the way in which Platinum Lace was being run and the concerns turned out to be true.

Mr Bromley-Martin also referred to the evidence that had been submitted by AB and which appeared at pages 461 to 462 of the Licensing Sub-Committee report. This was about an objection to the Sophisticats licence that had been withdrawn by someone who used to work at Platinum Lace. Evidence from the licensing authority did not support the evidence presented by AB. The applicants were of the view that AB had been commissioned by Mr Warr to obtain evidence against Sophisticats.

The Licensing Sub-Committee noted that both Mr Warr and Mr McKeown had initiated civil proceedings in connection with the respective licensing issues at both Sophisticats and Platinum Lace.

The Sub-Committee confirmed that it had seen the video which had been submitted in connection with the allegation of touting.

Mr Bromley-Martin commented on the allegation of backlinking, by which a hidden link is placed on a third-party website to benefit another website. In this case it was alleged that Sophisticats had engaged in backlinking to benefit their own website. This could either enhance the search engine optimisation (SEO) of the target website, or do the opposite, as Google could become aware of what was being done and drive down the ratings. Backlinks could accordingly be placed in order to downgrade a competitor. Mr Bromley-Martin commented that Sophisticats had never been involved in arranging backlinks and confirmed that people visiting websites with backlinks would not receive adverts or be aware that the backlink existed. He firmly asserted that there was no evidence to prove that Sophisticats had engaged in this practice. Although Mr Nash had indicated that the backlinks were being investigated by the police, to date no action had been taken.

Mr Bromley-Martin commented that the Back to School promotion had been targeted at parents after children had returned to school, and that no deleterious effect had been intended. The promotion had only been made available to persons aged over 18 and who had opted in to their mailing list. However, the sense that the wrong impression had been given meant it would not be done again.

The Sub-Committee heard the Objector's Case

Mr D'Souza addressed the Sub-Committee on behalf of Mr Warr and outlined the objections that had been made in connection with the licence renewal. These related to the Back to School promotion; the computer backlinking which had been taken up by Mr Warr through Mr Nash; and Mr Warr's objection in broad terms. Mr D'Souza commented that Mr Warr's submission had not been made in response to those made by Mr McKeown; and that he did not consider the language used to have been immoderate.

Mr D'Souza considered that the emails that had been referred to (between Mr Langer and Mr Millbank) were genuine, and that the content suggested that there had been a conspiracy to manipulate the City Council, which was behaviour that he considered dangerous and worrying. He believed that

obtaining a licence in the high-risk sector of sexual entertainment was a privilege that should be protected, and that licence holders needed to be trustworthy. Although Mr McKeown might have separated from Mr Langer, they had previously been business partners.

The Sub-Committee sought clarification of whether the evidence Mr Nash would provide on the malware and backlinks would be useful, and Mr D'Souza confirmed that it was material to the application and would be able to assist in the hearing.

Mr Nash addressed the Sub-Committee and confirmed that he worked for a company that undertook private investigations, most of which related to criminal activity. He had been in private investigation for two years, after spending 31 years with the Metropolitan Police and rising to the rank of Borough Commander. He had been instructed by Mr Warr for security services, to investigate the source of repeated objections to licence renewals relating to Platinum Lace. Mr Nash had conducted the investigation independent to Mr Warr and had not been pushed in a particular direction and had not detected any agenda that he would categorise as being malicious. His conclusions had also been his own, and not driven by Mr Warr. He confirmed that he would withdraw from any investigation which led to a conclusion that sat uncomfortably with the client who retained him and strongly objected to being described as a "hired gun".

Mr Nash informed the Sub-Committee that he had become involved in backlinking after audits of search engine optimisation for Platinum Lace had shown Sophisticats to be significantly outperforming other clubs. The audit had looked at what Sophisticats were doing that others were not and had found that unauthorised backlinking had been created with the use of a Russian tool, which had been ongoing for 4 years with connections to sites which included a Primary School; a Harley Davidson Dealership; and a luxury jewellery box maker. As Mr Nash did not have the power to undertake an investigation, the backlinking had been reported to the Police and was now with the Cybercrime Unit of the Metropolitan Police. The Sub-Committee asked Mr Nash whether he could provide any evidence that Sophisticats were responsible for the backlinking, and he confirmed that there was no specific evidence other than the software having been placed on Sophisticats' server.

The Chairman confirmed that although it was up to the Mr Warr as to how his case was presented, the more reliance they gave to things that they could not support with evidence, or to objectors they did not represent, the more they distracted from the point they were trying to make.

Mr Nash continued with his submission and confirmed that a Detective Sergeant who was supervising the team on cybercrime had confirmed that the backlinking was an active investigation in which Mr McKeown was being investigated by the Police. Mr McKeown informed the Sub-Committee that he had not personally added any backlinks and had not instructed anyone to do so.

Mr Nash explained that he had met Mrs Langer independently through a third party and had been assisting in the divorce which had involved the company

Sophisticats. He had met with Mrs Langer a number of times, as she thought she had information or evidence that would explain the behaviour of her husband, and of Mr McKeown as his business partner. Mrs Langer had come into the possession of two emails which had set out unregulated covert activity into Platinum Lace, which she shared with Mr Nash; and he had concluded that they were supportive of her belief that Mr Langer and Mr McKeown were seeking to destroy all opposition in their industry sector. Mr Nash confirmed that he had not met Mr Warr before the matters that were being discussed.

Mr Nash informed the Sub-Committee that the witnesses that had been employed by Sophisticats to visit Platinum Lace had been ex-police officers, and that he had spoken to one of them and had also concluded that there had been a concerted campaign against other sexual entertainment venues.

The parties discussed the wording of the emails which referred to obtaining evidence (pages 276 to 286 of the report), and whether there was anything that suggested false evidence should be created. Mr D'Souza analysed a number of sentences and suggested that the language used was one of a conspiracy against Platinum Lace and that the purpose was to manipulate the Council. Mr Bromley-Martin, on the other hand, said the language was expressing nothing more than a clear desire to get the matter reported in national newspapers. The Sub-Committee also noted that discussions on the value of Sophisticats as part of Mrs Langer's divorce settlement were ongoing and was subject to commercial litigation.

The Objector's Summary

Mr D'Souza considered that the obligations of the licensing authority were two-fold in allowing proper commercial development, and in the duty to the residents to ensure that individuals who were involved in high risk licences such as sexual entertainment venues were trustworthy. Mr D'Souza suggested that the Sub-Committee would not want to take risks with the character of an individual who was applying for a licence of this sort. Although it may be evidentially impossible at this time to prove that Sophisticats had put malware on to their system, he considered that Sophisticats were the only institution that could benefit from four years of back-linking without being detected. Mr D'Souza also considered that the language used in the two emails provided the evidence of wrong doing that Mr Bromley-Martin had asked for, and which should cause the Sub-Committee concern.

The Chairman sought clarification of the objections from Mr McKeown. He stated that he had been very open about what he did and did not know, and that ultimately what had been put before the press in connection with Platinum Lace had been factual. With regard to his relationship with his former business partner, Mr McKeown stated that they had different roles in which he ran the Clubs while Mr Langer would talk to people and be the public face. Mr McKeown informed the Sub-Committee that he had first seen the emails when he had received the bundle of Sub-Committee papers. Mr McKeown considered that the problem lay with Platinum Lace, who were allowing far too much close contact which took power away from the performers; and had caused difficulties at Sophisticats as the girls felt they had to allow more than they wanted to or

were comfortable with. Mr McKeown was not seeking to close down Mr Warr's business but wanted him to comply with the conditions of his licence.

The Sub-Committee sought clarification of the relationship the Applicant had with the journalist who had written the article about Platinum Lace. Mr McKeown confirmed that he knew him and was aware of what he was doing and had been satisfied that it had been honest reporting. He commented that the journalist had been very aware of how Mr McKeown felt and how uncomfortable he was with what had been happening at Platinum Lace, and that he wanted to make a stand. Mr McKeown was, however, grateful to Mr Nash for bringing the backlinking to his attention and stated that a business would not put malware on their own website, which would be directly contrary to their interests on many levels.

The Sub-Committee heard from the Licensing Authority and City Inspectors

Ms Haq addressed the Sub-Committee, and confirmed that the Licensing Authority had maintained their objections to allow investigations to be carried out regarding the allegations that had been made. They had also requested that the City Inspectors visited the premises.

Mr Hayes confirmed that a number of objections had been received at the time of the renewal hearing and having received similar objections on applications for similar venues the City Inspectors had visited the Premises as soon as practicable. The City Inspectors had reviewed as much CCTV as they could, including from the dates of the alleged breaches, but had not seen anything that would support the allegations of the objectors. The City Inspectors had also visited on a number of subsequent occasions. During each visit, the Premises were always obliging in providing facilities and the CCTV on whatever recordings were requested. Mr Hayes at no time saw anything that suggested the Premises were operating with the intention of not complying with the terms of the licence, and the overall supervision was found to be of a very good standard. Mr Hayes confirmed that the inspections had been more thorough in response to the objections.

Mr McKeown asked Mr Hayes whether he recalled a number of conversations they had in the past about Mr McKeown's concern for dancer welfare. Mr Hayes confirmed that he did and considered that Mr McKeown focussed on compliance in his clubs.

Summary – Mr Bromley-Martin

Mr Bromley-Martin summarised the submissions that had been made by the Applicant. With regard to the objection relating to backlinking, he considered that there was no evidence that Sophisticats had installed the software on their website. Backlinking could be put in place either to benefit or to damage and could be done by anyone. Mr McKeown had no motive to do so and had said in his statement that he had paid Google to enhance the search engine optimisation of Sophisticats, as did many other businesses and sexual entertainment venues. Lastly, backlinking did not in any event involve any

licensing considerations as, by way of example, primary school websites would not have any access to the Sophisticats websites due to any backlinking that had taken place.

With regard to the emails, the discussion and references that had been made had been about how to get the newspapers to take on the story and how much it was going to cost to do so. The emails had been produced at a late stage, and Mr Bromley-Martin commented that it was easy to forward an email and change the wording in it and suggested that it was difficult to make allegations if it was not known whether they were genuine.

Mr Bromley-Martin commented on the actions Mr McKeown had taken in 2015 to expose breaches of licence conditions at Platinum Lace and on the involvement of the newspapers; and suggested that it was difficult to allege that Mr McKeown had been involved in a conspiracy to fabricate evidence when it turned out that the evidence was true and had been accepted by the licensing authority.

Mr Bromley-Martin suggested that Platinum Lace was a sexual entertainment venue which had consistently breached the conditions of its licence, which they had been lucky to retain. He asked the Sub-Committee to accept Mr McKeown's motivation for trying to obtain evidence of breaches of licensing conditions by other clubs. On each occasion that Mr McKeown had been involved in obtaining evidence of breaches of conditions at Platinum Lace he had been vindicated by the subsequent decision of the Sub-Committee; and Mr Bromley-Martin suggested that operation of Platinum Lace should be compared with Mr Keown's own record which was unimpeachable

Chair Summing Up

The Sub-Committee thanked everyone for their submissions and commented that the process for licence renewals was different from other licensing applications, as the presumption was that a renewal of a licence would be granted unless there was a reason not to do so. The Sub-Committee had considered the material in detail over this and the previous hearing on 26 February 2019, with additional submissions having also been received. Members of the Sub-Committee had read through everything in detail prior to the hearing, and if a particular piece of correspondence had not been specifically mentioned, it did not mean that the issue had been ignored.

The Sub-Committee had noted the objections that had been made in relation to the applications. With regard to the 'Back to School' objection (that was only relevant to the Brewer Street application), the Applicant had admitted that the promotion had been unfortunate and was not something that would be repeated again. In the case of the touting objection (that was also only relevant to the Brewer Street application), the Sub-Committee had reviewed a video and submissions, but did not consider the evidence to be conclusive or provide grounds to reject the application. The Sub-Committee had also heard from the Licensing Authority and noted their rationale for submitting an objection, and it had not been disputed that there had been no evidence of major breaches of the license or licensing objectives. With regard to the objections relating to the backlinks and evidence contained in a number of emails that had been

submitted by the objector, the Sub-Committee was aware that certain criminal proceedings were taking place, and that there were a lot of allegations and suggestions which were clearly matters for other authorities.

The Sub-Committee had made the decision to adjourn that previous hearing on 26 February as serious allegations had been received which needed to be considered. The question arising was whether the objectors had proven their case such that the renewal of the licences should not be granted. Although the Sub-Committee had been asked to consider whether renewing the licence would be a risk, the test was whether the applicant was suitable to hold the licence. There was evidence of serious allegations that might need to be considered in a different forum but, crucially, there was no evidence of any serious breaches of the SEV licence at the premises. The allegations regarding the backlinks could not be evidentially proven and, similarly, might be a matter for another forum.

With regard to the issue of the emails, the Sub-Committee had needed to determine how much credence should be given to the suggestion that the evidence had indicated that the Applicant was not suitable to operate a licence. The Sub-Committee had listened carefully to everything that had been said in connection with the emails, and although it acknowledged that there had been some serious allegations, judgement of them was again an issue for another forum. It was not possible to determine that the applicant was not suitable based on the content of the emails as presented as it was possible that they were primarily about the desire to achieve national press coverage. The Sub-Committee had to take a view on the knowledge and information it had been given and had also relied on the fact that there had been no other evidence of licensing breaches.

The Sub-Committee would not tell people how to run their business but would say that this was not the forum to air and discuss some of the disputes that had clearly been going on within the industry. Although allegations had been made which were of serious concern, the Sub-Committee could not rely on them to refuse renewal and it was decided that the licences would, therefore, be renewed to reflect the fact that there was no evidence of any licensing breaches at the premises or evidence that the premises themselves were not being properly run.

The Sub-Committee confirmed that both Licences would be renewed subject to the Standard Conditions applicable to licences for sex establishments in Westminster as prescribed by the Council pursuant to Paragraph 13 of Schedule 3 to the Local Government (Miscellaneous Provisions) Act 1982.

2 SOPHISTICATS, 3-7 BREWER STREET, LONDON, W1F 0RD

LICENSING SUB-COMMITTEE No. 6

Wednesday 10th April 2019

Membership: Councillor Melvyn Caplan (Chairman),
Councillor Jim Glen and Councillor Shamim Talukder

Legal Adviser: Barry Panto
Committee Officer: Andrew Palmer
Presenting Officers: Michelle Steward
Daisy Gadd

Objections: The Licensing Authority, 3 anonymous objections
and Mr Simon Warr

Present: Michael Bromley-Martin QC (Leading Counsel, representing the Applicant), Mr Jack Spiegler and Mr Thomas O'Maoleoin (Solicitors, representing the Applicant), Mr John McKeown (on behalf of the Applicant company), Mr Dominic D'Souza (Counsel, representing Mr Simon Warr), Ms Lana Tricker (Solicitor, representing Mr Simon Warr), Mr Simon Warr (Objector), Mr Tony Nash (Investigative Consultant on behalf of Mr Warr), and Ms Roxsana Haq and Mr James Hayes (Licensing Authority).

Sophisticats, 3-7 Brewer Street, London, W1F 0RD ("The Premises") 18/11064/LISEVR	
1.	Renewal of a Sexual Entertainment Venue (SEV) Premises Licence
	<p>The application was to renew the Sexual Entertainment Venue (SEV) premises licence made by Devine Restaurants Ltd. It was noted that the licence had since been transferred to John McKeown Clubs Ltd.</p> <p>The application was initially due to be heard on 26 February 2019 and following a detailed discussion it was agreed that this was adjourned until a later date. This was partly to allow the applicant to be able to properly respond to some of the allegations that had been made by Mr Warr and which had only been served on the applicant by the licensing authority a few days before the hearing.</p>
2.	Amendments to application advised at hearing:
	<p>Late submissions were received from the applicant's solicitors on 5th and 8th April in the form of a report on back linking, a witness statement dated 5th April 2019 in the name of John McKeown and a response from the licensing inspectorate (dated 6th April 2019) to a Freedom of Information request.</p> <p>Late submissions were also received from one of the objectors.</p> <p>Before the Hearing commenced, the representatives for the Applicant and Mr Warr discussed the order of submissions with the Sub-Committee, and agreed that as both parties were fully aware of the objections that had been made, the</p>

	<p>Applicant would make his case to the Sub-Committee first followed by Mr Warr.</p>
	<p>Decision (including reasons if different from those set out in report):</p> <p>The Sub-Committee heard the Applicant’s Case</p> <p>Mr Bromley-Martin addressed the Sub-Committee on behalf of the Applicant and asked that two further documents be taken into account. These comprised of a short one-page second statement from the Applicant; and a schedule. Mr Bromley-Martin explained that it had not been possible to submit the statement prior to the hearing, as it referred to information contained in the response to the Freedom of Information request which had only recently been received. The schedule referred to information that had already been provided. Mr D’Souza responded on behalf of Mr Warr, and commented that dates and chronology concerning a former employee of Platinum Lace were not admitted. Mr Bromley-Martin also requested that the applications for the renewal of the sexual entertainment venue premises licences at 3-7 Brewer Street and 77 Welbeck Street be dealt with at the same time, and that 3-7 Brewer Street be dealt with first as the submissions could be seen to apply more to Brewer Street than Welbeck Street.</p> <p>There was no objection to the approach suggested by Mr Bromley-Martin from either the objectors present or the members of the Licensing Sub-Committee.</p> <p>Mr Bromley-Martin considered that the principal objection to the application had related to the suitability of Mr McKeown as Applicant and confirmed that he would be seeking to address this. Mr D’Souza agreed that the suitability of Mr McKeown and Mr Simon Langer as effectively sole shareholders and directors would be brought into question. Mr D’Souza also commented that there may be an issue to consider regarding renewal.</p> <p>As Legal Advisor to the Sub-Committee, Mr Panto confirmed that the SEV licences in respect of 3-7 Brewer Street and 77 Welbeck Street had both been transferred to John McKeown Clubs Ltd, with Mr McKeown as sole Director. Mr D’Souza commented that Mr Warr could make separate submissions later in the hearing concerning who in truth was benefitting from the licence or renewal applications. Mr Bromley-Martin confirmed that although Mr Simon Langer had formerly been a joint owner with Mr McKeown, he had not been involved in Sophisticats since March 2018, and was accordingly not at the hearing.</p> <p>The Sub-Committee asked why the application for 77 Welbeck Street was continuing while the premises were closed and being redeveloped. Mr Bromley-Martin confirmed that trade at 77 Welbeck Street would need to start as soon as the redevelopment had been completed.</p> <p>Mr Bromley-Martin referred to the objections made which related to 77 Welbeck Street, and noted that the first objection had been from the Licensing Authority; the second had related to ‘back linking’ to the Sophisticats website; and the third to Mr Warr’s objection that Mr Bromley-Martin would comment on in due course.</p>

With regard to 3-7 Brewer Street, the first objection had again been from the Licensing Authority and had referred to the CCTV at the premises, which was comprehensive with all areas being monitored and particular attention being given to the private dancing areas. Mr Bromley-Martin suggested that much of the physical contact seen in CCTV recordings had been instigated by the customer, with the performer taking action to stop the contact. When the performer had not properly responded, the CCTV had shown that the Premises Manager had carried out supervision and then had discussions with the performer. Mr Bromley-Martin commented that although the Licensing Authority had reported that some physical contact had occurred, the CCTV had not appeared to show that it had been knowingly in contravention of the conditions attached to the Licence. CCTV recordings and the incident log had again been reviewed on two subsequent unannounced visits, which had each found the premises to be well run and operating in accordance with the conditions of the licence. Mr Bromley-Martin commented that the premises had never been found in breach of any of the Licence conditions.

Mr Bromley-Martin referred to the objections made in relation to 3-7 Brewer Street, and would explain that the anonymous objection made in connection with a 'Back to School' promotion by Sophisticats had been made through a misunderstanding; and that an objection to what had been claimed to be touting had also been insubstantial. He would also comment on the anonymous objection relating to backlinking, which he believed to be linked with Mr Warr who was the operator of Platinum Lace and other premises across the country. Mr Bromley-Martin indicated that the applicants thought that the objection had been made by an individual that was named at the Sub-Committee but was later advised that this objection had actually been made by someone else.

Mr Bromley-Martin suggested that the objections made by Mr D'Souza on behalf of Mr Warr had been immoderate and repetitive and had made a series of allegations that aimed to set out alleged criminal conduct on the part of Mr McKeown and Mr Langer. He questioned whether some of the alleged offences set out on page 148 of the report were offences at all. He also suggested that the Sub-Committee might consider how it should respond to the suggestion that it had been misled by alleged fraudulent objections that had allegedly been made by Sophisticats to the renewal of the licence for Platinum Lace.

The Chairman reminded the hearing that the Licensing Sub-Committee was not a criminal court, and that part of the reason for hearing the objectors first was that the details of concerns that had been raised could be obtained at an early stage. The duties of the Sub-Committee related to the appropriate licencing rules and regulations, and the decision on whether to grant the licence or not would be made on that basis. Although the Sub-Committee would be very tolerant in terms of what was said, any arguments relating to criminal acts would not be heard, and it would make no comment on alleged criminality at any time during the hearing.

For clarification and the avoidance of any doubt, Mr Panto commented that it was not the function of the Licensing Sub-Committee to determine criminal liability. However, he also advised that it was important to place on record that the Sub-Committee would not prevent the allegations being made as to the

suitability of the applicant or the motives for those allegations being made.

Mr Bromley-Martin suggested that the objections from Mr Warr had been made in response to the breaches of licensing conditions at his premises Platinum Lace, which was also a sexual entertainment venue. In his witness statement, Mr McKeown had confirmed that in 2015, his then partner Mr Langer had arranged for an article to be placed in several newspapers setting out concerns over breaches of the operators' licence at Platinum Lace. Although Mr McKeown had also instructed witnesses to visit Platinum Lace, and subsequently provided evidence to the City Council, he had not submitted an objection to the renewal the licence and the application had been granted. In 2016, Mr McKeown had again instructed witnesses to visit Platinum Lace to provide evidence for the City Council but had not objected to the licence renewal.

Mr Bromley-Martin referred to the supplementary schedule which set out comparative compliance between Platinum Lace and Sophisticats and highlighted the incidents at Platinum Lace which had been witnessed by the Licensing Authority in 2015. These had indicated a breach of the no-touching condition; no CCTV coverage in booths; and complacent supervision. Action taken had included an upgrade of CCTV; the suspension of the head supervisor; and improved supervision in booths. Although Mr Bromley-Martin could not be specific about the application for renewal of the licence for Platinum Lace in 2017, he could confirm that Mr McKeown had not been involved in the renewal in 2018.

Mr Bromley-Martin informed the Sub-Committee that Mr McKeown was concerned that widespread breaches of Licence conditions in the industry were contributing to an expectation among customers that physical contact in a performance during relevant entertainment was permitted. This resulted in a risk of conflict, compromise and breaches of conditions when customers visited a compliant sexual entertainment venue; and of more concern, compromised the safety of women who worked in these establishments. He suggested that the alleged breaches of conditions at Platinum Lace had not been highlighted by Mr McKeown for commercial reasons or to do harm to Mr Ward's business, but had been done out of public interest and a genuine concern over the way the industry was heading. He acknowledged that Mr McKeown's motives had not been wholly altruistic and were to his advantage on some levels, as he had his own business to protect and wished to remain in the industry. Mr McKeown would not condone the abuse of performers, which was something he had not tolerated in his own clubs. Premises that permitted physical contact could also gain a commercial advantage to the detriment of others which were compliant to license conditions.

Mr Bromley-Martin referred to Mr Warr's statement, and suggested that the submission from Mr Nash, who was a retired policeman, had expressed the view that Mr McKeown's motivation had been to damage Mr Warr as a competitor. Similarly, although Mr Warr had suggested that the information given in the newspaper articles had been fabricated and had misled the Sub-Committee, each of the matters raised had been supported by other evidence from the licensing authority itself. Similar evidence had also resulted in the licensing authority refusing to renew the licence for the Windmill.

Mr Bromley-Martin noted that a statement from Tony Nash had also referred to Mr Langer's wife and ongoing divorce proceedings and questioned the legitimacy of her submissions in view of her having being arrested by the police and cautioned for assault on Mr Langer. Mr Bromley-Martin confirmed that if Mrs Langer's statement was to be used, she would have been asked to attend the hearing to give evidence and answer questions. The Chairman reminded all parties that members of the Sub-Committee had read the papers, and that objectors could not be compelled to attend as the hearing was not a court of law.

Mr Bromley-Martin stated that it was difficult for Mr McKeown to make any judgements on the emails and text messages that had allegedly been sent by and received from Simon Langer and on which emphasis was made by Mr Warr and Mr Nash. He was of the view that they did not indicate anything more than ordinary negotiations with a freelance journalist and Mr Langer to get information for the newspaper article about the way in which Platinum Lace was being run and the concerns turned out to be true.

Mr Bromley-Martin also referred to the evidence that had been submitted by AB and which appeared at pages 461 to 462 of the Licensing Sub-Committee report. This was about an objection to the Sophisticats licence that had been withdrawn by someone who used to work at Platinum Lace. Evidence from the licensing authority did not support the evidence presented by AB. The applicants were of the view that AB had been commissioned by Mr Warr to obtain evidence against Sophisticats.

The Licensing Sub-Committee noted that both Mr Warr and Mr McKeown had initiated civil proceedings in connection with the respective licensing issues at both Sophisticats and Platinum Lace.

The Sub-Committee confirmed that it had seen the video which had been submitted in connection with the allegation of touting.

Mr Bromley-Martin commented on the allegation of backlinking, by which a hidden link is placed on a third-party website to benefit another website. In this case it was alleged that Sophisticats had engaged in backlinking to benefit their own website. This could either enhance the search engine optimisation (SEO) of the target website, or do the opposite, as Google could become aware of what was being done and drive down the ratings. Backlinks could accordingly be placed in order to downgrade a competitor. Mr Bromley-Martin commented that Sophisticats had never been involved in arranging backlinks and confirmed that people visiting websites with backlinks would not receive adverts or be aware that the backlink existed. He firmly asserted that there was no evidence to prove that Sophisticats had engaged in this practice. Although Mr Nash had indicated that the backlinks were being investigated by the police, to date no action had been taken.

Mr Bromley-Martin commented that the Back to School promotion had been targeted at parents after children had returned to school, and that no deleterious effect had been intended. The promotion had only been made available to persons aged over 18 and who had opted in to their mailing list. However, the

sense that the wrong impression had been given meant it would not be done again.

The Sub-Committee heard the Objector's Case

Mr D'Souza addressed the Sub-Committee on behalf of Mr Warr and outlined the objections that had been made in connection with the licence renewal. These related to the Back to School promotion; the computer backlinking which had been taken up by Mr Warr through Mr Nash; and Mr Warr's objection in broad terms. Mr D'Souza commented that Mr Warr's submission had not been made in response to those made by Mr McKeown; and that he did not consider the language used to have been immoderate.

Mr D'Souza considered that the emails that had been referred to (between Mr Langer and Mr Millbank) were genuine, and that the content suggested that there had been a conspiracy to manipulate the City Council, which was behaviour that he considered dangerous and worrying. He believed that obtaining a licence in the high-risk sector of sexual entertainment was a privilege that should be protected, and that licence holders needed to be trustworthy. Although Mr McKeown might have separated from Mr Langer, they had previously been business partners.

The Sub-Committee sought clarification of whether the evidence Mr Nash would provide on the malware and backlinks would be useful, and Mr D'Souza confirmed that it was material to the application and would be able to assist in the hearing.

Mr Nash addressed the Sub-Committee and confirmed that he worked for a company that undertook private investigations, most of which related to criminal activity. He had been in private investigation for two years, after spending 31 years with the Metropolitan Police and rising to the rank of Borough Commander. He had been instructed by Mr Warr for security services, to investigate the source of repeated objections to licence renewals relating to Platinum Lace. Mr Nash had conducted the investigation independent to Mr Warr and had not been pushed in a particular direction and had not detected any agenda that he would categorise as being malicious. His conclusions had also been his own, and not driven by Mr Warr. He confirmed that he would withdraw from any investigation which led to a conclusion that sat uncomfortably with the client who retained him and strongly objected to being described as a "hired gun".

Mr Nash informed the Sub-Committee that he had become involved in backlinking after audits of search engine optimisation for Platinum Lace had shown Sophisticats to be significantly outperforming other clubs. The audit had looked at what Sophisticats were doing that others were not and had found that unauthorised backlinking had been created with the use of a Russian tool, which had been ongoing for 4 years with connections to sites which included a Primary School; a Harley Davidson Dealership; and a luxury jewellery box maker. As Mr Nash did not have the power to undertake an investigation, the backlinking had been reported to the Police and was now with the Cybercrime Unit of the Metropolitan Police. The Sub-Committee asked Mr Nash whether he could

provide any evidence that Sophisticats were responsible for the backlinking, and he confirmed that there was no specific evidence other than the software having been placed on Sophisticats' server.

The Chairman confirmed that although it was up to the Mr Warr as to how his case was presented, the more reliance they gave to things that they could not support with evidence, or to objectors they did not represent, the more they distracted from the point they were trying to make.

Mr Nash continued with his submission and confirmed that a Detective Sergeant who was supervising the team on cybercrime had confirmed that the backlinking was an active investigation in which Mr McKeown was being investigated by the Police. Mr McKeown informed the Sub-Committee that he had not personally added any backlinks and had not instructed anyone to do so.

Mr Nash explained that he had met Mrs Langer independently through a third party and had been assisting in the divorce which had involved the company Sophisticats. He had met with Mrs Langer a number of times, as she thought she had information or evidence that would explain the behaviour of her husband, and of Mr McKeown as his business partner. Mrs Langer had come into the possession of two emails which had set out unregulated covert activity into Platinum Lace, which she shared with Mr Nash; and he had concluded that they were supportive of her belief that Mr Langer and Mr McKeown were seeking to destroy all opposition in their industry sector. Mr Nash confirmed that he had not met Mr Warr before the matters that were being discussed.

Mr Nash informed the Sub-Committee that the witnesses that had been employed by Sophisticats to visit Platinum Lace had been ex-police officers, and that he had spoken to one of them and had also concluded that there had been a concerted campaign against other sexual entertainment venues.

The parties discussed the wording of the emails which referred to obtaining evidence (pages 276 to 286 of the report), and whether there was anything that suggested false evidence should be created. Mr D'Souza analysed a number of sentences and suggested that the language used was one of a conspiracy against Platinum Lace and that the purpose was to manipulate the Council. Mr Bromley-Martin, on the other hand, said the language was expressing nothing more than a clear desire to get the matter reported in national newspapers. The Sub-Committee also noted that discussions on the value of Sophisticats as part of Mrs Langer's divorce settlement were ongoing and was subject to commercial litigation.

The Objector's Summary

Mr D'Souza considered that the obligations of the licensing authority were two-fold in allowing proper commercial development, and in the duty to the residents to ensure that individuals who were involved in high risk licences such as sexual entertainment venues were trustworthy. Mr D'Souza suggested that the Sub-Committee would not want to take risks with the character of an individual who was applying for a licence of this sort. Although it may be evidentially impossible at this time to prove that Sophisticats had put malware on to their system, he

considered that Sophisticats were the only institution that could benefit from four years of back-linking without being detected. Mr D'Souza also considered that the language used in the two emails provided the evidence of wrong doing that Mr Bromley-Martin had asked for, and which should cause the Sub-Committee concern.

The Chairman sought clarification of the objections from Mr McKeown. He stated that he had been very open about what he did and did not know, and that ultimately what had been put before the press in connection with Platinum Lace had been factual. With regard to his relationship with his former business partner, Mr McKeown stated that they had different roles in which he ran the Clubs while Mr Langer would talk to people and be the public face. Mr McKeown informed the Sub-Committee that he had first seen the emails when he had received the bundle of Sub-Committee papers. Mr McKeown considered that the problem lay with Platinum Lace, who were allowing far too much close contact which took power away from the performers; and had caused difficulties at Sophisticats as the girls felt they had to allow more than they wanted to or were comfortable with. Mr McKeown was not seeking to close down Mr Warr's business but wanted him to comply with the conditions of his licence.

The Sub-Committee sought clarification of the relationship the Applicant had with the journalist who had written the article about Platinum Lace. Mr McKeown confirmed that he knew him and was aware of what he was doing and had been satisfied that it had been honest reporting. He commented that the journalist had been very aware of how Mr McKeown felt and how uncomfortable he was with what had been happening at Platinum Lace, and that he wanted to make a stand. Mr McKeown was, however, grateful to Mr Nash for bringing the backlinking to his attention and stated that a business would not put malware on their own website, which would be directly contrary to their interests on many levels.

The Sub-Committee heard from the Licensing Authority and City Inspectors

Ms Haq addressed the Sub-Committee, and confirmed that the Licensing Authority had maintained their objections to allow investigations to be carried out regarding the allegations that had been made. They had also requested that the City Inspectors visited the premises.

Mr Hayes confirmed that a number of objections had been received at the time of the renewal hearing and having received similar objections on applications for similar venues the City Inspectors had visited the Premises as soon as practicable. The City Inspectors had reviewed as much CCTV as they could, including from the dates of the alleged breaches, but had not seen anything that would support the allegations of the objectors. The City Inspectors had also visited on a number of subsequent occasions. During each visit, the Premises were always obliging in providing facilities and the CCTV on whatever recordings were requested. Mr Hayes at no time saw anything that suggested the Premises were operating with the intention of not complying with the terms of the licence, and the overall supervision was found to be of a very good standard. Mr Hayes confirmed that the inspections had been more thorough in response to

the objections.

Mr McKeown asked Mr Hayes whether he recalled a number of conversations they had in the past about Mr McKeown's concern for dancer welfare. Mr Hayes confirmed that he did and considered that Mr McKeown focussed on compliance in his clubs.

Summary – Mr Bromley-Martin

Mr Bromley-Martin summarised the submissions that had been made by the Applicant. With regard to the objection relating to backlinking, he considered that there was no evidence that Sophisticats had installed the software on their website. Backlinking could be put in place either to benefit or to damage and could be done by anyone. Mr McKeown had no motive to do so and had said in his statement that he had paid Google to enhance the search engine optimisation of Sophisticats, as did many other businesses and sexual entertainment venues. Lastly, backlinking did not in any event involve any licensing considerations as, by way of example, primary school websites would not have any access to the Sophisticats websites due to any backlinking that had taken place.

With regard to the emails, the discussion and references that had been made had been about how to get the newspapers to take on the story and how much it was going to cost to do so. The emails had been produced at a late stage, and Mr Bromley-Martin commented that it was easy to forward an email and change the wording in it and suggested that it was difficult to make allegations if it was not known whether they were genuine.

Mr Bromley-Martin commented on the actions Mr McKeown had taken in 2015 to expose breaches of licence conditions at Platinum Lace and on the involvement of the newspapers; and suggested that it was difficult to allege that Mr McKeown had been involved in a conspiracy to fabricate evidence when it turned out that the evidence was true and had been accepted by the licensing authority.

Mr Bromley-Martin suggested that Platinum Lace was a sexual entertainment venue which had consistently breached the conditions of its licence, which they had been lucky to retain. He asked the Sub-Committee to accept Mr McKeown's motivation for trying to obtain evidence of breaches of licensing conditions by other clubs. On each occasion that Mr McKeown had been involved in obtaining evidence of breaches of conditions at Platinum Lace he had been vindicated by the subsequent decision of the Sub-Committee; and Mr Bromley-Martin suggested that operation of Platinum Lace should be compared with Mr Keown's own record which was unimpeachable

Chair Summing Up

The Sub-Committee thanked everyone for their submissions and commented that the process for licence renewals was different from other licensing applications, as the presumption was that a renewal of a licence would be granted unless there was a reason not to do so. The Sub-Committee had considered the material in detail over this and the previous hearing on 26

February 2019, with additional submissions having also been received. Members of the Sub-Committee had read through everything in detail prior to the hearing, and if a particular piece of correspondence had not been specifically mentioned, it did not mean that the issue had been ignored.

The Sub-Committee had noted the objections that had been made in relation to the applications. With regard to the 'Back to School' objection (that was only relevant to the Brewer Street application), the Applicant had admitted that the promotion had been unfortunate and was not something that would be repeated again. In the case of the touting objection (that was also only relevant to the Brewer Street application), the Sub-Committee had reviewed a video and submissions, but did not consider the evidence to be conclusive or provide grounds to reject the application. The Sub-Committee had also heard from the Licensing Authority and noted their rationale for submitting an objection, and it had not been disputed that there had been no evidence of major breaches of the license or licensing objectives. With regard to the objections relating to the backlinks and evidence contained in a number of emails that had been submitted by the objector, the Sub-Committee was aware that certain criminal proceedings were taking place, and that there were a lot of allegations and suggestions which were clearly matters for other authorities.

The Sub-Committee had made the decision to adjourn that previous hearing on 26 February as serious allegations had been received which needed to be considered. The question arising was whether the objectors had proven their case such that the renewal of the licences should not be granted. Although the Sub-Committee had been asked to consider whether renewing the licence would be a risk, the test was whether the applicant was suitable to hold the licence. There was evidence of serious allegations that might need to be considered in a different forum but, crucially, there was no evidence of any serious breaches of the SEV licence at the premises. The allegations regarding the backlinks could not be evidentially proven and, similarly, might be a matter for another forum.

With regard to the issue of the emails, the Sub-Committee had needed to determine how much credence should be given to the suggestion that the evidence had indicated that the Applicant was not suitable to operate a licence. The Sub-Committee had listened carefully to everything that had been said in connection with the emails, and although it acknowledged that there had been some serious allegations, judgement of them was again an issue for another forum. It was not possible to determine that the applicant was not suitable based on the content of the emails as presented as it was possible that they were primarily about the desire to achieve national press coverage. The Sub-Committee had to take a view on the knowledge and information it had been given and had also relied on the fact that there had been no other evidence of licensing breaches.

The Sub-Committee would not tell people how to run their business but would say that this was not the forum to air and discuss some of the disputes that had clearly been going on within the industry. Although allegations had been made which were of serious concern, the Sub-Committee could not rely on them to refuse renewal and it was decided that the licences would, therefore, be renewed to reflect the fact that there was no evidence of any licensing breaches

at the premises or evidence that the premises themselves were not being properly run.

The Sub-Committee confirmed that both Licences would be renewed subject to the Standard Conditions applicable to licences for sex establishments in Westminster as prescribed by the Council pursuant to Paragraph 13 of Schedule 3 to the Local Government (Miscellaneous Provisions) Act 1982.

The Meeting ended at 2.05 pm.