

WITNESS STATEMENT OF TONY NASH

I, Tony Nash will say as follows:

1. I am a retired police officer having spent 31 years working for the Metropolitan Police Service (MPS).
2. During my service I was a nationally accredited Senior Investigating Officer and spent 5 years leading teams investigating homicides and serial rapes including historic offences.
3. I led Trident proactive teams to suppress gun crimes in London and sat as The MPS representative on The National Ballistic Intelligence Service (NABIS) strategic group developing co-ordinated strategic processes both nationally and internationally.
4. I was a lead figure in developing the capacity to undertake money laundering investigations across local policing in London.
5. My final posting was as a Detective Chief Superintendent/Borough Commander at Newham.
6. During my final three postings I was heavily involved in enforcing professional standards.
7. Whilst providing senior officer night duty cover for London I oversaw many serious incidents involving licensed premises.
8. For many years I regularly looked at and commissioned work into licensed premises as crime drivers and anti-social behaviour hot-spots.
9. I am currently a consultant investigator for TM Eye Limited which specialises in private criminal investigations and where appropriate private criminal prosecutions.
10. I have been instructed by Mr Simon Warr, the owner of a sexual entertainment venue known as Platinum Lace, to investigate anonymous complaints made against his business Platinum Lace, and whether there has been any misconduct in relation to such complaints. In this statement I set out the current state of my investigation.
11. In the course of my investigation, on 20th September 2018 I met a lady I now know as Diane Langer. She is the wife of Simon Langer, who runs two sexual entertainment venues known as Sophisticats in Marylebone and Soho, together with his business partner John McKeown. She told me that she and her husband were getting a divorce and that she and Mr Langer were in a legal dispute over her shareholding in the operating companies. The Marylebone venue was due to close with the end of the lease in January 2019.

12. Mrs. Langer informed me that Simon and John stopped her income and she was struggling to make ends meet, especially with 3 children. She decided to sell her iPhone X and utilise one of the many redundant phones around the house. She found an old hand-set and turned it on. On doing so she had discovered communications between Simon Langer, John McKeown and a freelance journalist named James Millbank discussing how they would undermine other lap-dancing clubs. After some time, Diane Langer provided a witness statement to me outlining her account of what had happened and provided me with a print-out of the message thread.
 13. A copy of the witness statement is now produced and shown to me marked "TN1".
 14. A copy of the message thread is now produced and shown to me marked "TN2".
 15. The said exhibits provide credible evidence that the three men, Simon Langer, John McKeown and reporter James Millbank, had planned and/or conducted activity aimed at undermining the sexual entertainment venue ("SEV") licences of similar businesses including 'The Windmill', 'Platinum Lace' and 'Stringfellows' during or around their annual renewal period.
 16. At the time of taking Mrs. Langer's statement, it transpired that 'The Windmill' was in the midst of legal proceedings regarding the non-renewal of their Sexual Entertainment Venue Licence ("SEVL").
 17. Mrs. Langer recounts a conversation with her husband Simon about the business in January 2016. She states that her husband said he had a plan to get rid of the opposition. This appears to have involved sending persons into rival clubs who would then make allegations to Westminster City Council ("WCC") of misconduct within those clubs.
 18. That plan appears to have been carried into action in the case of Platinum Lace with visits made in 2015, 2016 and 2018.
- 2015 visit**
19. It appears that Platinum Lace was visited on 12th December 2015 by a male accompanied by two females who paid for private dances with a dancer called 'Mindy'. It is common in SEVs for dancers to assume "stage names."
 20. 'Mindy' is in fact a lady called Billie Whyatt. There is now produced and shown to me marked "TN3" a copy of Miss Whyatt's dancer file from Platinum Lace, with irrelevant details redacted. The file records that she had stated that she had worked at a club called Spearmint Rhino in Leicester. However, the record has the word "Sophisticats" written on it and circled.
 21. I understand that the audition for 'Mindy' to work at Platinum Lace was completed by Martine Watkinson. She was able to explain to me that she wrote the reference

to Sophisticats as other dancers had told her that 'Mindy' was, or had been, working there.

22. On this occasion the two females with the male were identified by management of Platinum Lace who recognised them as two women who had briefly worked at the club a few weeks before. They are Veronika Dumitru and Dana Ewe. Their dancer files are now produced and shown to marked "TN4", again with irrelevant details redacted. It will be seen that during their auditions, both dancers stated they last worked at Sophisticats.

23. Diane Langer had already confirmed to me that both had been working at Sophisticats in 2015 but had been dismissed for what she believed were drugs related issues. She told me she had overheard a conversation between the two dancers and John McKeown in Sophisticats where Mr McKeown informed the dancers that if they wanted their jobs back, they would have to help frame another (unspecified) club. Mrs. Langer also stated to me that John and Dana were in a casual sexual relationship (primarily in the club).

24. I have spoken to Kenny Favel, the Designated Premises Supervisor (DPS) and Operations Director for Platinum Lace who had investigated this matter. His investigation had revealed a number of concerns regarding the 2015 incident, which are summarised in the statement of Simon Warr dated 27th December 2018.

25. To summarise the position in relation to this incident:

- a. There is evidence that Simon Langer and John McKeown set out to damage opposition clubs through covert investigations.
- b. In pursuit of this aim, Mr Langer and Mr McKeown sent in a male "customer" (actually a freelance journalist) and two other women to procure evidence against Platinum Lace.
- c. The two women had been dismissed from Sophisticats but were induced to participate in the covert operation to get their jobs back, following drugs offences.
- d. Those women assisted in the operation by standing so as to prevent a view of what was occurring.
- e. The report of the incident failed to note interventions by management staff.
- f. The dancer involved, Mindy, had not told the truth when she started working at Platinum Lace, namely that she had been working at Sophisticats.
- g. The dancer deliberately behaved in a way which was out of keeping with dancers at Platinum Lace by permitting the "customer" to touch her.
- h. This was then filmed on a mobile phone.
- i. Following this incident 'Mindy' never returned to 'Platinum Lace' or responded to communications from the management team.

26. I believe that the evidence discloses a credible case that Platinum Lace was "set up" as part of an operation designed to damage its business and reputation.

27. The position is then compounded by the message thread at exhibit "TN2". The thread speaks for itself, but shows clearly how Simon Langer, John McKeown and James Millbank set out to induce tabloid newspapers to run a story about misconduct at Platinum Lace based on the incident referred to above. Specifically, the inducement was to be financial. Furthermore, the purpose of securing national coverage for the story was to try to persuade WCC to take regulatory action against the club. This is evident, for example, in the comment of Millbank in his email to Messrs. Langer and McKeown dated 20th December 2015:

"We have the new footage [mobile phone footage] which is been ready to go this week – which I hope you feel works well and fits the bill from the council perspective."

...
"The only thing I like about the involvement of a newspaper is that they will send a couple of reporters to both the club and the CC and that has a habit of concentrating everyone's mind."

28. With these facts to hand there are reasonable grounds to implicate John McKeown along with Simon Langer and James Millbank in planning and carrying out hostile covert acts aimed at undermining the SEV licence of Platinum Lace in December 2015. The evidence supports the notion that this entire 'incident' and the 'allegations' therein were predetermined and fabricated.

2016 visits

29. In October 2016 two former police officers, Mark Halton and Joseph Mercer conducted a third-party visit to Platinum Lace resulting in a formal letter of complaint to Westminster City Council regarding alleged behaviour at the venue in breach of the SEVL conditions.

30. Kenny Favel reviewed the CCTV and was able to provide Westminster City Council with evidence that the complaint was in many parts exaggerated and simply failed to record pre-emptive interventions by management staff.

31. The outcome of these events was that WCC officers did not consider that regulatory action was merited against Platinum Lace and the licence was duly renewed on an administrative basis.

32. I believe Mark Halton was commissioned by John McKeown. I await a meeting with Mark Halton. Should this point be verified it would show that this was the second time that John McKeown had a part in commissioning hostile covert services against a business competitor with a view to undermining their business.

2018 visit

33. On 26th September 2018 Platinum Lace was again made the subject of a private, third party complaint to Westminster City Council by 3 females, one of whom provided her name as 'Maya Von Doll'. The complaint was as a result of a visit on 12th July 2018 (over two months before the complaint was lodged).
34. The complaint was based on the witness statements of individuals named Stuart Jenkins and Nick Mason.
35. This most recent complaint was made well outside the CCTV retention period for the club. This has deprived Platinum Lace of the ability to review the CCTV from the dates in question in order to test the veracity of the evidence. In the context of the allegations which have been made, this is most unfortunate. It appears likely that the delay in submitting the evidence was specifically in order to prevent Platinum Lace being able to review and rebut the evidence by reference to the contemporaneous CCTV footage.
36. However, as Simon Warr describes in his statement, the records retained by Platinum Lace show that, during the dances concerned, there were positive interventions by security staff. These are not detailed within the witness statements. This undermines the veracity of the allegations.
37. As Mr Warr points out, the complaint to WCC regarding Platinum Lace refers expressly, but erroneously, to Windmill, and appears to replicate the language of a complaint made in relation to those premises.
38. Paperwork in relation to the non-renewal of the SEVL for 'The Windmill' was also submitted by Maya Von Doll (Maya Hawie). It is clear that the complaint against Platinum Lace is a 'copy and paste' of the complaint against The Windmill.
39. This amounts to credible evidence that the person who was responsible for the Windmill objection is the same person who objected to Platinum Lace, even if they objected through others or using pseudonyms or aliases.
40. Enquiries at this point suggest that one of the complainants in both cases is Maya Von Doll. Diane Langer states that she knows the individual concerned and Maya Von Doll is in fact Maya Marie Hawie, who is a close friend of John McKeown. It appears that she, John McKeown and Simon Langer were directors of a company named UKG Music plc (no. OC384623), now dissolved. I understand that she and Mr McKeown are still partners in a recording company (SYPM Music Limited), as referred to by Mr Warr. A copy of the companies register is now produced and shown marked "TNS".

41. Based on similar fact and with the association to Maya Von Doll (Maya Hawie), I believe that John McKeown and Simon Langer were the architects of the 2018 complaint, as they had been in relation to the 2015 and 2016 complaints.

42. I have also seen a copy of a text message sent from Maya to Simon Langer (who forwards the same to John McKeown) and it is clear she is reluctant to put her own name to the complaint. A copy of the text message is now produced and shown to me marked "TN6". In the event, Maya lied about her identity on the form of objection, presumably encouraged or connived at by McKeown and/or Langer.

43. There is also produced and shown to me marked "TN7" a copy of a text message between John McKeown and Simon Langer where they discuss the 'need to compose a letter objecting to the renewal at the Windmill'. These text messages link all parties to the complaints in relation to The Windmill and, because of the 'copy and paste' element, Platinum Lace too.

44. Diane Langer states that John McKeown and Simon Langer had some form of leverage over Maya as they had provided her with payslips and references from Sophisticats (despite Maya having never worked there) so that she could apply for a mortgage. If this is true, it would amount to a fraud on the mortgage company, aided and abetted by McKeown and Langer.

Illegal Internet Domain Hacking

45. I have also been made aware of behaviour that I deem criminal and accordingly I have sent the details of this activity to the Metropolitan Police who are investigating the evidence supplied.

46. In summary, Sophisticats have been using illegal malware to hijack non related innocent internet domains to boost their own profile rating. Details of these actions and evidence of the illegal hack is marked as "TN8".

47. I became aware of this activity as an independent company doing an audit on Platinum Lace's website noticed inconsistent data profiling between Platinum Lace and Sophisticats. The company have already passed this information to WCC and asked me for my evaluation too.

48. I believe the forensic expert is happy to provide further evidence to WCC and attend court if necessary. Since conducting my investigation into this allegation, Diane Langer informed me that Simon Langer's son is an expert with computer programming.

49. Evidence suggests that Sophisticats had been previously black-listed by Google for similar conduct. On this occasion, I believe they have hacked around 5,000 web domains. All of the evidence in relation to these activities as indicated are within exhibit TN8.

Conclusion

50. In the first two scenarios (2015 and 2016) there is evidence to link the active involvement of John McKeown and Simon Langer into the hostile visits where on both occasions the truthfulness is undermined through CCTV.
51. In respect of the third complaint (2018), the opportunity to rebut the complaint with CCTV footage has been frustrated by the withholding of information until after the expiry of the CCTV retention period. However, fortunately, the intervention records prove that the accounts of Messrs. Jenkins and Mason are flawed through the omission of the critical proactive and pre-emptive actions of Platinum Lace staff.
52. All three visits have been third party, un-regulated, covert visits without the requisite authorities and safeguards of RIPA that would be required if these visits had been conducted by any statutory agency including Police and Westminster City Council. These include the authorisation of an independent designated and trained senior member of staff based on the evidential narrative for the requested authority, proportionality, necessity, legality and accountability.
53. I believe that the evidence supports the position that John McKeown and Simon Langer were at the heart of these complaints with a mix of associates.
54. Although the investigation is a continuing one, there is clearly credible evidence that Messrs. McKeown and Langer instigated a course of action which was motivated by malice and which resulted in their paid associates making allegations against Platinum Lace which were, by turns, deceitful, exaggerated and incomplete.
55. The contents of this statement are true to the best of my knowledge and belief.

Tony Nash
Investigation Consultant

Dated 30th December 2018