



# City of Westminster Licensing Sub-Committee

|                           |   |
|---------------------------|---|
| <b>Meeting:</b>           | <i>Licensing Sub-Committee</i>  |
| <b>Date:</b>              | <i>28 February 2019</i>   |
| <b>Classification:</b>    | <i>General Release</i>  |
| <b>Premises:</b>          | <i>Platinum Lace Gentleman's Club, Unit 33,<br/>Trocadero, 13 Coventry Street, London, W1D 7AB<br/><br/>18/10134/LISEVR</i> |
| <b>Wards Affected:</b>    | <i>St James's, Core CAZ North</i>   |
| <b>Financial Summary:</b> | <i>None</i>   |
| <b>Report of:</b>         | <i>Operational Director for Public Protection &amp;<br/>Licensing</i>   |

## **1. Executive Summary**

- 1.1 The council has received an application for the renewal of the sex establishment licence under the Local Government (Miscellaneous Provisions) Act 1982 (the Act) for Platinum Lace Gentleman's Club, Unit 33, Trocadero, 13 Coventry Street, London, W1D 7AB. Platinum Lace is licensed to operate as a sexual entertainment venue under the Act. The report sets out the application details, objections, policy and legal context along with other considerations that the Licensing Sub-Committee requires to determine this application.

## **2. Recommendations**

- 2.1 That following consideration of this report, any information given orally at the hearing and/or in writing by the applicants and objectors the Licensing Sub-Committee may determine to:
  - 2.1.1 Grant the application in full
  - 2.1.2 Grant the application subject to the standard conditions and/or any modifications to any part of the application and imposition of any additional conditions proposed by a party to the hearing, or
  - 2.1.3 Refuse the application

### **3. Relevant history**

- 3.1 Platinum Lace has operated as a sex establishment since 2012. Following the grant of the sex establishment licence for Platinum Lace in 2012, annual renewal applications have been submitted and granted under delegated authority. The last renewal application for this licence was submitted on 20 September 2017 and was granted under delegated authority. This licence (reference 17/10426/LISEVR) expired on 30 September 2018. A copy of licence 17/10426/LISEVR is attached as **Appendix A1**.
- 3.2 A copy of the full sex establishment licence history for this premises since 2012 is attached as **Appendix B1**.

### **4. Application being considered**

- 4.1 On 30 August 2018, Platinum Lace (Management) Limited submitted an application to renew the sex establishment licence to continue to operate the premises as a sexual entertainment venue. The licence permits relevant entertainment Monday to Saturday from 15:00 to 06:00 and Sunday from 15:00 to 03:00.
- 4.2 The applicant has not requested to change the relevant entertainment or to remove any standard conditions to the licence if this application is granted. A copy of the application form is attached as **Appendix C1**.
- 4.3 As a valid application has been received prior to the expiry of the SEV Premises Licence, the licence is deemed to continue until it is determined by the Council.

### **5. Objections**

#### Objection 1

- 5.1 On 24 September 2018, an objection was received to the renewal application within the statutory 28 day consultation period (attached as **Appendix D1**). In the objection, the objector stated that they believe in women's rights and do not believe in the objectification of women. The objector employed covertly ex-police officers to observe inside the premises. The objector states that these visits identified breaches of licence conditions, particularly those concerning contact between customer and performers and the conduct of performers.
- 5.2 The objector has not confirmed to the Licensing Service that they wish to waive their right to anonymity, and for this reason the objector will remain anonymous.

#### Objection Licensing Authority

- 5.3 On 26 September 2018, the Licensing Authority submitted an objection to the renewal application (attached as **Appendix D2**) within the statutory 28 day consultation period. The Licensing Authority objected to this renewal application

pending investigation into compliance with licence conditions and suitability of the applicant.

5.4 On 7 February 2019, the Licensing Authority provided further submissions in the form of a witness statement. This witness statement is attached as **Appendix D3**.

5.5 The main points detailed in this witness statement were:

- CCTV images have been viewed of periods on 28 August, 12 September and 21 September 2018.
- The images viewed for these aforementioned dates revealed numerous breaches of the 'no touching' condition.
- Most of the breaches witnessed were initiated by performers, rather than customers, suggesting there may be a management problem at the venue.

## **6. Licensing Act 2003 Premises Licence**

6.1 The premises currently benefits from a premises licence (reference 15/07927/LIPCH) issued under the provisions of the Licensing Act 2003. A copy of the current premises licence is provided at **Appendix E1** of this report.

## **7. Policy Considerations**

### 7.1 Suitability of applicant – SU1

The applicant has stated that no relevant offences have been committed.

### 7.2 SEV carried on for the benefit of another person – SU2

The applicant has confirmed that they will not be carrying out the functions of regulated entertainment at this premises for the benefit of another person.

### 7.3 Appropriate number of SEV in a locality – NO1

The appropriate number of sexual entertainment venues in the relevant localities is 25 in the Westminster core CAZ north. As the premises are currently licensed this application, if granted, will not exceed 25.

### 7.4 Character of the relevant locality – LO1

Outside of the premises there is a large footway which is a main thoroughfare between Piccadilly Circus and Leicester Square.

## 7.5 Use of premises in the vicinity – LO2

The main use of the premises in the immediate vicinity is commercial. There are no other sex establishments or faith groups within a 100m radius of the premises. The residential count within a 100m radius of the premises is 59. A map of the relevant locality is attached to this report as **Appendix F1**.

## 7.6 Layout, character or condition of the venue – LO3

The premises has its main entrance on Coventry Street. Only the basement floor is included within the licensable area for Relevant Entertainment purposes.

## 8. **Legal Implications**

8.1 The Licensing Sub-Committee may determine to:

- (a) Grant the application in full
- (b) Grant with additional special conditions which the Licensing Sub-Committee deem appropriate; or
- (c) Refuse the application.

8.2 Before refusing to renew an application, the Licensing Authority shall give the licence holder an opportunity to appear before and of being heard by the Licensing Sub-Committee (Para 10(19) Schedule 3 LG(MP)A1982).

8.3 In considering this application, the Licensing Sub-Committee shall have regard to any observations submitted to them by the Chief Officer of Police and any objections that have been received in writing within the 28 day consultation period (Para 10(18) Schedule 3 LG(MP)A1982).

8.4 The Licensing Sub-Committee may refuse to grant or renew a licence for the following reasons set out in (Para 12(3) Schedule 3 LG(MP)A1982):

- (a) that the applicant is unsuitable to hold a licence by reason of having been convicted of an offence or for any other reason;
- (b) that if the licence were to be granted the business to which it relates would be managed by or carried on for the benefit of a person, other than the applicant, who would be refused the grant of such a licence if he made the application himself;
- (c) that the number of sex establishments, or of sex establishments of a particular kind, in the relevant locality at the time the application is determined is equal to or exceeds the number which the authority consider is appropriate for that locality;
- (d) that the grant or renewal of the licence would be appropriate, having regard:
  - (i) to the character of the relevant locality; or
  - (ii) to the use to which any premises in the vicinity are put; or
  - (iii) to the layout, character or condition of the premises, vehicle, vessel or stall in respect of which the application is made.

An applicant whose application for the grant or renewal of a licence is refused on either ground specified in paragraph (c) or (d) above shall not have the right to appeal to the magistrates' court.

- 8.5 If the Licensing Sub-Committee determine to grant a Sexual Entertainment Venue licence, the licence will be subject to the Standard Conditions for Sexual Entertainment Venue licences, unless the Sub-Committee determines that certain Standard Conditions should be expressly excluded or varied (Para 13(4) Schedule 3 LG(MP)A1982).
- 8.6 Should the Licensing Sub-Committee determine to refuse the application for the renewal of a licence under Paragraph 12(3)(a) or (b) Schedule 3 LG(MP)A 1982, the applicant may appeal to the Magistrates' Court within 21 days beginning with the date on which the applicant is notified of the refusal of his application (Para 27(1) Schedule 3 LG(MP)A1982). The licence will remain in force until the time for bringing an appeal has expired and, if such an appeal is brought, until the determination or abandonment of that appeal (Para 27(10) Schedule 3 LG(MP)A1982).

## **9. Human Rights and Equality Issues**

- 9.1.1 In making a decision consideration will need to be given to the applicant's rights under the European Convention on Human Rights. The right to peaceful enjoyment of possessions (Article 1 of the First Protocol) and freedom of expression (Article 10) may be relevant.
- 9.1.2 The Council in its capacity as Licensing Authority has a duty to have regard to its public sector equality duty under section 149 of the Equality Act 2010. In summary section 149 provides that a Public Authority must, in the exercise of its functions, have due regard to the need to-
- (a) eliminate discrimination harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
  - (c) foster good relations between persons who share a relevant protected characteristics and persons who do not share it.
- 9.3.1 149 (7) of the Equality Act 2010 defines the relevant protected characteristics as age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

## **Appendices**

- A1 – Copy of sex establishment licence 17/10426/LISEVR
- B1 – Sex establishment licence history
- C1 – Application form
- D1 – Objection 1
- D2 – Licensing Authority objection
- D3 – Licensing Authority further submissions
- E1 – Copy of premises licence 15/07927/LIPCH
- F1 – Map of locality

**If you have any queries about this Report or wish to inspect any of the Background Papers please contact: Daisy Gadd on 020 7641 6500 or at [dgadd@westminster.gov.uk](mailto:dgadd@westminster.gov.uk)**

## **BACKGROUND PAPERS**

Local Government (Miscellaneous Provisions) Act 1982  
Policing and Crime Act 2009  
Sexual Entertainment Venues Statement of Licensing Policy 2012  
Sexual Entertainment Venues Guidance and Procedure effective 17 February 2012  
Home Office Guidance March 2010

**SEX ESTABLISHMENT LICENCE**  
**Sexual Entertainment Venue**

|                          |                 |
|--------------------------|-----------------|
| Premises licence number: | 17/10426/LISEVR |
| Original Reference:      | 12/01631/LISEVN |

The CITY OF WESTMINSTER, under the provisions of the Local Government (Miscellaneous Provisions) Act 1982 as amended by the Policing and Crime Act 2009

hereby licences:  
to use the premises:

Platinum Lace (Management) Limited  
Platinum Lace Gentleman's Club  
Unit 33 Trocadero  
13 Coventry Street  
London  
W1D 7AB

as a Sexual Entertainment Venue.

This licence commences on 1 October 2017 and will expire on 30 September 2018.

Relevant Entertainment may be provided during the following times:

|                    |                |
|--------------------|----------------|
| Monday to Saturday | 15:00 to 06:00 |
| Sunday             | 15:00 to 03:00 |

Relevant Entertainment may only be provided in the permitted areas outlined in red shown on the plans attached at Appendix 1.

This licence is granted subject to the conditions attached at Appendix 2.

**DATE: 25 OCTOBER 2017 SIGNED:**



**On behalf of the Director – Public Protection  
and Licensing**



# Appendix 1 – Plans



|  |                  |   |   |                  |         |                     |           |                  |            |          |             |           |
|--|------------------|---|---|------------------|---------|---------------------|-----------|------------------|------------|----------|-------------|-----------|
| <p>Review all plans with the relevant others<br/>         All drawings are for information<br/>         Subject to being approved by the<br/>         relevant authority. It is the user's<br/>         responsibility to ensure that the<br/>         drawings are used for the intended<br/>         purpose and not for any other purpose.</p> <p>CCTV Camera locations<br/>         are shown in purple.</p> | <h2>Plan</h2>    | <p>13, Conway Street<br/>         Loughlin<br/>         W1D 7JH</p> <p>Project:<br/>         CCTV</p> | <p style="text-align: center;"><b>ods</b></p> <p style="text-align: center;"><b>EXISTING</b></p> <p style="font-size: small;">             020 7080 1000<br/>             25, Northbank Road, London E20 2JH<br/>             4/2022 (1/22)         </p> <table border="1" style="width: 100%; font-size: x-small;"> <tr> <td>DATE: 17/02/2022</td> <td>BY: JAC</td> <td>REV: REVISION 1/1/1</td> </tr> <tr> <td>SCALE: A3</td> <td>STATUS: COMPLETE</td> <td>PROJECT: -</td> </tr> <tr> <td>OWNER: -</td> <td>DESIGNER: -</td> <td>CLIENT: -</td> </tr> </table> | DATE: 17/02/2022 | BY: JAC | REV: REVISION 1/1/1 | SCALE: A3 | STATUS: COMPLETE | PROJECT: - | OWNER: - | DESIGNER: - | CLIENT: - |
| DATE: 17/02/2022   | BY: JAC          | REV: REVISION 1/1/1   |   |                  |         |                     |           |                  |            |          |             |           |
| SCALE: A3  | STATUS: COMPLETE | PROJECT: -  |   |                  |         |                     |           |                  |            |          |             |           |
| OWNER: -   | DESIGNER: -      | CLIENT: -   |   |                  |         |                     |           |                  |            |          |             |           |

## Appendix 2 – Conditions

### Standard Conditions:

1. Whilst Relevant Entertainment is taking place no person under the age of 18 shall be on the licensed premises and a clear notice to that effect shall be displayed at the entrance in a prominent position so that it can be easily read by persons entering the premises.
  2. Whenever persons under the age of 18 are admitted to the premises there will be no promotional or other material on display within the premises which depicts nudity or partial nudity.
  3. The licence or a clear copy shall be prominently displayed at all times so as to be readily and easily seen by all persons using the premises.
  4. No provision of relevant entertainment, or material depicting nudity or relevant entertainment, shall be visible from outside the premises.
  5. Menus and drinks price lists shall be clearly displayed at the front entrance of the club, reception area, tables and bar at such a position and size as to be easily read by customers. This price list shall show all consumable items and any minimum tariff including charges and fees applicable to Performers.
  6. Except with the consent of the Licensing Authority, no advertisements of any kind (including placard, poster, sticker, flyer, picture, letter, sign or other mark) shall be inscribed or affixed at the premises, on the surface of the highway or on any building, structure, works, street furniture, tree or any other property or be distributed in the street to the public that advertises or promotes the relevant entertainment at the premises.
  7. The licence holder or other person concerned in the conduct or management of the premises shall not seek to obtain custom by means of personal solicitation or touting, nor enter into any agreement with a third party to do so.
  8. Adequate toilets, washing and changing facilities for use by the Performers shall be provided.
  9. Either the licence holder or a named responsible person shall be present throughout the time the Relevant Entertainment takes place.
  10. The premises will install and maintain a comprehensive CCTV system as per the minimum requirements of a Metropolitan Police Crime Prevention Officer that ensures all areas of the licensed premises are monitored including all entry and exit points will be covered enabling frontal identification of every person entering any light condition. All cameras shall continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Recordings shall be made available immediately upon the request of Police or authorised officer throughout the preceding 31 day period together with facilities for viewing.
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11. A staff member from the premises who is conversant with the operation of the CCTV system shall be on the premises at all times when the premises is open to the public and this staff member should be able to show Police recent data and footage with the absolute minimum of delay of the request.
  12. An incident log shall be kept at the premises, and made available on request to the Licensing Authority or the Police, which will record the following:
    - (a) all crimes reported to the venue;
    - (b) all ejections of patrons;
    - (c) any complaints received;
    - (d) any incidents of disorder;
    - (e) seizures of drugs or offensive weapons;
    - (f) any faults in the CCTV system or searching equipment or scanning equipment;
    - (g) any refusal of the sale of alcohol;
    - (h) any visit by a relevant authority or emergency service;
    - (i) any breach of licence conditions reported by a Performer.
  13. The licence holder shall produce a Code of Conduct setting out rules and obligations between the licence holder and performers whilst performing. All Performers shall sign the Code of Conduct in their proper name acknowledging that they have read, understood and are prepared to abide by the said Code of Conduct, and a copy so signed shall be retained by the licence holder and shall be readily available for inspection by the Police and/or authorised persons upon reasonable request.
  14. Individual records shall be kept at the premises of the real names, stage names and addresses of all Performers working at the premises. The record will include either a copy of their birth certificate, current passport, EU driving licence or national identity card and shall be made immediately available for inspection by the Police and/or the Licensing Authority upon request.
  15. Details of all work permits and/or immigration status relating to persons working at the premises shall be retained by the licence holder and be readily available for inspection by the Licensing Authority, a Police Officer or Immigration Officer.
  16. Relevant entertainment shall be given only by Performers and the audience shall not be permitted to participate in the relevant entertainment.
  17. There shall be no physical contact between Performers whilst performing.
  18. Performers will not request or give out any telephone number, address or any other contact information from or to any customer. Any such information given by a customer shall be surrendered to the premises manager as soon as is practicable.
  19. Relevant Entertainment shall take place only in the designated areas approved by the Licensing Authority as shown on the licence plan. Arrangements for access to the dressing room shall be maintained at all times whilst Relevant Entertainment is taking place and immediately thereafter.
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20. Customers must remain fully clothed at all times. The Performer must not remove any of the customer's clothing at any time.
21. Where relevant entertainment is provided in booths, or other areas of the premises where private performances are provided, the booth or area shall not have a door or other similar closure, the area shall be constantly monitored by CCTV, and access to the booth or other area shall be adequately supervised.
22. Whenever Relevant Entertainment is being provided there shall be no physical contact between Performers and customers or between customers and Performers except for the exchanging of money or tokens at the beginning or conclusion of the performance and only for the purpose of that performance. Clearly legible notices to this effect shall clearly be displayed in each private booth and in any performance area.
23. Performers must redress fully immediately after each performance.

**Additional Conditions:**

24. SIA Registered supervisors shall be posted in the parts of the premises where striptease/table/lap dancing is taking place.
  25. All public areas of the premises shall be sufficiently illuminated to afford SIA registered supervisors a clear view of the dancers.
  26. The number of persons accommodated at any one time (excluding staff) shall not exceed the following:
    - i. Capacity of 350 (customers) until 01:30 hrs
    - ii. Capacity of 250 (customers) from 01:30 hrs until 03:00 hours
    - iii. Capacity of 200 (customers) after 03:00 hrs until closing time.
  27. The premises licence holder will use their best endeavours, from 01:00am, to ensure that there are no more than 250 customers in the premises after 01:00am.
  28. The onus on proving best endeavours shall lie with the licence holder, (but if the capacity of 200 is exceeded after 1.30am then provided they have used their best endeavours, there will be no breach of the licence).
  29. A daily log is to be maintained to ensure that any capacity limit set for the basement is recorded hourly and can be properly monitored. Information regarding the capacity will be given to an authorised officer or Police Officer on request.
  30. All seating shall consist of tables and chairs arrangement and there shall be no cinema style seating.
  31. All emergency doors shall be maintained effectively self closing and not held open other than by an approved device.
-

32. The edges of the treads of steps and stairways shall be maintained so as to be conspicuous.
  33. Curtains and hangings shall be arranged so as not to obstruct emergency signs.
  34. The approved arrangements at the premises, including means of escape provisions, emergency warning equipment, the electrical installation and mechanical equipment, shall at all material times be maintained in good condition and full working order.
  35. The means of escape provided for the premises shall be maintained unobstructed, free of trip hazards, be immediately available and clearly identified in accordance with the plans provided.
  36. All exit doors shall be available at all material times without the use of a key, code, card or similar means.
  37. Any special effects or mechanical installations shall be arranged and stored so as to minimise any risk to the safety of those using the premises. The following special effects will only be used on 10 days prior notice being given to the Licensing Authority where consent has not previously been given.
    - iv. pyrotechnics including fire works
    - v. firearms
    - vi. lasers
    - vii. explosives and highly flammable substances.
    - viii. real flame.
    - ix. strobe lighting.
  38. No noise shall emanate from the premises nor vibration be transmitted through the structure of the premises which gives rise to a nuisance.
-

**Sex establishment licence history****Appendix B1**

| <b><u>Application reference</u></b> | <b><u>Details of application</u></b>  | <b><u>Date of determination</u></b> | <b><u>Decision</u></b> |
|-------------------------------------|---|-------------------------------------|------------------------|
| 12/01631/LISEVN                     | Application for a new Sexual Entertainment Venue licence.   | Granted by Licensing Sub-Committee  | 11 June 2012           |
| 13/07141/LISEVR                     | Application to renew the Sexual Entertainment Venue licence.  | Granted under Delegated Authority   | 25 November 2013       |
| 14/07838/LISEVR                     | Application to renew the Sexual Entertainment Venue licence.  | Granted under Delegated Authority   | 9 December 2014        |
| 15/01051/LISEVT                     | Application to transfer the Sexual Entertainment Venue licence from Platinum Lace Trading Ltd to Platinum Lace Leicester Square Limited. This company changed company name to Platinum Lace (Management) Limited on 18 August 2015. | Granted under Delegated Authority   | 17 November 2015       |
| 15/07970/LISEVR                     | Application to renew the Sexual Entertainment Venue licence.  | Granted under Delegated Authority   | 17 November 2015       |
| 16/10004/LISEVR                     | Application to renew the Sexual Entertainment Venue licence.  | Granted under Delegated Authority   | 12 January 2017        |
| 17/10426/LISEVR                     | Application to renew the Sexual Entertainment Venue licence.  | Granted under Delegated Authority   | 25 October 2017        |



City of Westminster

**APPLICATION TO RENEW A SEXUAL ENTERTAINMENT VENUE LICENCE**

IMPORTANT: This form is open to inspection by the public.

I / We ..... **Platinum Lace (Management) Limited**  
*(Insert name(s) of applicant)*

apply to renew the Sexual Entertainment Venue licence under the Local Government (Miscellaneous Provisions) Act 1982 for the following premises:

Premises name: ..... **Platinum Lace Gentleman's Club**  
Unit 33, Trocadero, 13 Coventry Street, London W1D 7AB  
Premises address: .....  
Licence reference number: ..... **17/10426/LISEVR**

**Important Note:** Before completing this application, please read the following:

- WCC's Statement of Licensing Policy for Sexual Entertainment Venues
- WCC's Standard Conditions for Sexual Entertainment Venues
- WCC's Rules of Procedure governing Sexual Entertainment Venue applications

**PART 1 – Applicant Details**

Please state whether you are renewing the Sexual Entertainment Venue licence as:

- a) an individual or individuals  complete section (A)
- b) a person other than an individual:
- i. as a body corporate  complete section (B)
- ii. as an unincorporated body  complete section (B)

**Section A – Individual Licensee Details**

|   |  |
|---|--|
| First name(s):  |  |
| Surname:  |  |
| Former names (if any):  |  |
| Title:  |  |
| Home address:   |  |
| Postcode:   |  |
| Email address:  |  |
| Contact telephone number:   |  |
| Date of Birth:  |  |
| Have you been a resident of an EEA state throughout the period of 6 months immediately preceding the date the application was made? | Yes <input type="checkbox"/> No <input type="checkbox"/> |

**Additional Licensee Details (if necessary)**

|   |  |
|---|--|
| First name(s):  |  |
| Surname:  |  |
| Former names (if any):  |  |
| Title:  |  |
| Home address:   |  |
| Postcode:   |  |
| Email address:  |  |
| Contact telephone number:   |  |
| Date of Birth:  |  |
| Have you been a resident of an EEA state throughout the period of 6 months immediately preceding the date the application was made? | Yes <input type="checkbox"/> No <input type="checkbox"/> |

**Section B – Body Corporate or Unincorporated Body Details**

|  |  |
|--|--|
| Business Name:<br>(if your business is registered, use its registered name)  | Platinum Lace (Management) Limited                                     |
| Is your business registered in the UK with Companies House?  | Yes <input checked="" type="checkbox"/><br>Registered Number: 06619812 |
|  | No <input type="checkbox"/>  |
| Is your business registered in another EEA state:  | Yes <input type="checkbox"/><br>EEA State:<br>Registered Number:       |
|  | No <input checked="" type="checkbox"/>                                 |
| Legal Status: (e.g. Company Partnership, etc)  | Limited Company  |
| Home Country:<br>(the country where the headquarters of your business is located)  | England  |
| Registered Address:  | Clarendon House<br>Shenley Road<br>Borehamwood<br>Hertfordshire        |
| Postcode:  | WD6 1AG  |
| <b>Directors, Partners, Owners and Managers</b>  |  |
| You must provide details of all DIRECTORS (if the applicant is a company), all PARTNERS (if it is a partnership), and all MANAGERS of the business or organisation, including day-to-day MANAGERS OF THE PREMISES. |  |
| Have there been any changes to the directors, partners or managers involved with the premises?   | Yes <input checked="" type="checkbox"/> please see below) No           |
| If yes, please provide details of the changes on a separate sheet, including the full name, private address and capacity of each director, partner and manager involved with the operation of the premises.        |  |

|   |                                    |
|---|------------------------------------|
| Full name:  | Simon Warr                         |
| Private address:  | [REDACTED]                         |
| Capacity:   | Director                           |
| Full name:  | Simon Gordon                       |
| Private address:  | [REDACTED]                         |
| Capacity:   | Secretary                          |
| Full name:  | Kenneth Favel                      |
| Private address:  | [REDACTED]                         |
| Capacity:   | Manager / DPS                      |
| Full name:  | Donovan Fyfe                       |
| Private address:  | [REDACTED]                         |
| Capacity:   | Manager                            |
| Full name:  | Aimiliano Kakko                    |
| Private address:  | [REDACTED]                         |
| Capacity:   | Manager                            |
| Full name:  | Mazen Nasr Eldine                  |
| Private address:  | [REDACTED]                         |
| Capacity:   | Manager                            |
| Full name:  | Constantina Cristina Onuta         |
| Private address:  | [REDACTED]                         |
| Capacity:   | Manager                            |
| Full name:  | Leslie James Pierce                |
| Private address:  | [REDACTED]                         |
| Capacity:   | Operations Manager (for the group) |
| <b>Please use a separate sheet if necessary- see attached</b> |                                    |

### Other Business Interests

Is the applicant, or any person named in this application, involved in any way with any other sex establishment (e.g. sexual entertainment venue, sex shop, sex cinema, hostess bar)?

Yes  (please complete below) No

Please provide details, including the name and address of the establishment and the nature and extent of the interest. (If necessary please provide a separate sheet).

Simon Peter Warr – Director and shareholder in other Platinum Lace Gentleman's Clubs as follows:

Platinum Lace Norwich – 15 Dove Street, Norwich NR2 1DE  
Platinum Lace Brighton – 76 East Street, Brighton BN1 1NF  
Platinum Lace Glasgow – 24 Drury Street, Glasgow G2 5AA  
Platinum Lace Leicester – 1 Abbey Street, Leicester LE1 3TE  
Platinum Lace Leicester Square - Basement Victory House, 14 Leicester Square, London WC2H 7NG

Leslie James Pierce also acts as operations manager for all the above venues.

Simon Gordon is financial controller for all the above venues.

Kenneth Favel is also manager/DPS of 'Platinum Lace Leicester Square'.

## PART 2 – Premises Details

|                            |   |
|----------------------------|---|
| Premises name:             | Platinum Lace   |
| Premises address:          | Unit 33<br>Trocadero<br>13 Coventry Street<br>London                      |
| Postcode:                  | W1D 7AB   |
| Premises telephone number: | 020 7297 3200   |
| Email:                     | <a href="mailto:london@platinumlace.co.uk">london@platinumlace.co.uk</a>  |
| Website address:           | <a href="http://www.platinumlace.co.uk">http://www.platinumlace.co.uk</a> |

|   |   |
|---|---|
| Where the licence is for a vehicle, vessel or stall, state where it is used as a sexual entertainment venue:          | n/a   |
| Have there been any changes to the nature of the relevant entertainment since the licence was last granted / renewed? | Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| If yes, please provide details below.   |   |
|   |   |

### **PART 3 – Convictions / Disqualifications**

|   |
|---|
| Have you, or any person named in or associated with this application, been convicted of any crime or offence?         |
| Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>   |
| If yes, please provide details on a separate sheet  |
| Have you been refused the renewal of a licence for this premises, vehicle, vessel or stall within the last 12 months? |
| Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>   |
| If yes, has the refusal been reversed on appeal?  |
| Yes <input type="checkbox"/> No <input type="checkbox"/>  |
| Have you had a sex establishment licence revoked in Westminster within the last 12 months?                            |
| Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>   |

### **PART 4 - Checklist**

Please tick as appropriate:

|   |                                     |
|---|-------------------------------------|
| All relevant sections of the application form have been completed in full | <input checked="" type="checkbox"/> |
|---|-------------------------------------|

|  |   |
|--|---|
| Payment of the fee has been made in full (refer to Part 6 of this form)  | X |
| Notice of this application has been published in a local newspaper / will be published in a local newspaper within the next 7 days, a full copy of the newspaper to be provided to the Licensing Authority as soon as possible | X |
| Notice of this application has been displayed at the premises  | X |
| The application has been served on the Metropolitan Police Service   | X |

## PART 5 - Declaration

**APPLICANTS ARE WARNED THAT ANY PERSON WHO, IN CONNECTION WITH AN APPLICATION FOR THE RENEWAL OF A LICENCE MAKES A FALSE STATEMENT WHICH HE KNOWS TO BE FALSE IN ANY MATERIAL RESPECT, OR WHICH HE DOES NOT BELIEVE TO BE TRUE, IS GUILTY OF AN OFFENCE AND LIABLE ON SUMMARY CONVICTION TO A FINE NOT EXCEEDING TWENTY THOUSAND POUNDS (£20,000).**

Lana Jane Tricker, LT Law

I ..... declare that the information given above is true and complete in every respect.

|           |   |
|-----------|---|
| Signed    |  |
| Date:     | 30 August 2018  |
| Capacity: | Solicitor for Applicant   |

For joint applications:

|           |  |
|-----------|--|
| Signed    |  |
| Date:     |  |
| Capacity: |  |

**Agent Details**

Are you an authorised agent acting on behalf of the applicant?

Yes  No

If yes, please provide the following:

|                         |                                    |
|-------------------------|------------------------------------|
| Agent name:             | Lana Tricker, LT Law               |
| Agent Address:          | LT Law<br>18 Soho Square<br>London |
| Postcode:               | W1D 3QL                            |
| Agent Telephone Number: | 020 3755 5138                      |
| Agent Email:            | lana@ltlaw.co.uk                   |

**Correspondence Details**

Please provide the details to which all correspondence should be sent:

|                   |                                    |
|-------------------|------------------------------------|
| Name:             | Lana Tricker, LT Law               |
| Address:          | LT Law<br>18 Soho Square<br>London |
| Postcode:         | W1D 3QL                            |
| Telephone Number: | 020 3755 5138                      |
| Email:            | lana@ltlaw.co.uk                   |

**PART 6 – Payment**

If applying by post you can pay by cheque, postal order or credit / debit card. Please make cheques and postal orders payable to 'City of Westminster'.

If you would like to pay by credit / debit card please complete this section:

|                              |                               |   |
|------------------------------|-------------------------------|---|
| Type of credit / debit card: | Visa <input type="checkbox"/> | MasterCard <input type="checkbox"/>                             |
|                              | Solo <input type="checkbox"/> | Maestro <input type="checkbox"/> Delta <input type="checkbox"/> |
| Card number:                 |                               |   |
| Issue date:                  | /                             | (mm/yy)   |
| Expiry date:                 | /                             | (mm/yy)   |
| Issue number:                | (for Maestro / Solo)          |   |
| Name on card:                |                               |   |
| Amount (£):                  |                               |   |

**THIS APPLICATION SHOULD BE COMPLETED IN FULL AND RETURNED TO THE LICENSING SERVICE, PREMISES MANAGEMENT, WESTMINSTER CITY HALL, 64 VICTORIA STREET, LONDON, SW1E 6QP.**

Notice of Objection to Sexual Entertainment Venue (SEV) Licence at

Platinum Lace 13 Coventry Street

London

W1D 7DH.

[REDACTED]

We believe in women's rights. We do not believe in the objectification of women and lap-dancing clubs do not have an easy fit within most types of feminist thinking but simultaneously, dance is universal and a beautiful form of self-expression and requires strength, sensuality and stamina with tension and intelligence within the choreography and should not play part in rape culture, sexual manipulation or abuse in any shape or form.

Professional dancing is a cross between art and sport. These women are artists and athletes, much the same as a Victoria Secrets model, but vulnerable without high-profile agents and some struggling to pay their mortgage. They are within control of a management who could be pushing the boundaries and even prostituting them. A law designed to regulate clubs exists and The Windmill club needs to be shut down as a matter of urgency to stop the gropes, pinching and slaps and even more importantly to stop those managers who in the pursuit of profit are pressuring their dancers into lewd acts and legally speaking, are in fact encouraging the sexual assault of their dancers. These women need to be treated with respect, with restricted rights and conditions, not as pieces of meat, forced, coerced and bullied.

If those clubs are not punished or shut down over these practises then it also means that customers get used to treating all dancers abusively. They will have an ill-gotten expectation of getting more than a dance and they will bring that disrespectful attitude to properly run clubs. This directly impacts the whole industry and threatens all dancers.

We have subsequently employed covertly, ex police officers to observe what exactly happens within the venue and provide ourselves with statements re. what they have seen.

The statements provided and attached have shown quite clearly that the performers within breach strict conditions on the premises licence and SEV held at the venue, particularly those that concern contact between customer and performer and the conduct of performers.

Rather worrying is the fact that security ignore such breaches.

These breaches of conditions, the actions of performers, the contact between performer and customer show that the current owners and management are not fit and proper persons to hold an SEV licence in Westminster.

**Witness Statement (CJ Act 1967.s.9,MC Act 1980, s.s.5A (3a) and 5B MC Rules 1981, r70).**

**Witness Statement of Mr Stuart Jenkins**

Dated: 13th July 2018

Further to my previous statement dated 12<sup>th</sup> July 2018 concerning the observations I carried out at 'PLATINUM LACE', 13 Coventry Street, London WC2.

I have been asked to clarify the timings of the dances I received at the venue during my observations. I conducted my observations from 2330 hours on Wednesday 11<sup>th</sup> July 2018 to 0150 hours on Thursday 12<sup>th</sup> July 2018 – (2 hours 20 minutes). I am only able to provide approximate dance times as at the time of my visit it was not possible or appropriate to make notes whilst I was in the premises.

During my observations I paid for and received three dances. The first two dances were with the female dancer who gave her name as 'Penny'. The third dance was with two female dancers who gave their names as 'Lola' AKA Christine and 'Diana'.

I would estimate the three dances took place between 2355 hours on 11<sup>th</sup> July 2018 and 0135 hours on 12<sup>th</sup> July 2018.

**Mr Stuart Jenkins**

**13<sup>th</sup> July 2018**

Witness Statement (CJ Act 1967.s.9,MC Act 1980, s.s.5A (3a) and 5B MC Rules 1981, r70).

Witness Statement of Mr Stuart Jenkins

Dated: 12th<sup>th</sup> July 2018

I am a former Police Officer having retired from the Metropolitan Police after completion of over 30 years exemplary service. Throughout my police career the majority of my service was spent on specialist units engaged on proactive operations :- 1993–1997 Central Territorial Support Group (TSG) - Level 1 Public Order, firearms officer and dedicated surveillance officer; 1997–1998 CO14 Clubs & Vice Unit – test purchase officer and street offences investigations; 1998-2000 Charing Cross Division on promotion – overt and covert licensing operations; 2000-2008 CO14 Clubs & Vice Unit – OIC for the investigation of serious criminal offences within licensed premises across London, test purchase officer, licensing tactical advisor and intelligence unit supervisor; 2008-2018 Marine Policing Unit (MPU) – licensing led for the MPU; licensing tactical advisor Notting Hill Carnival, covert licensing operations and intelligence unit supervisor. I am a Home Office qualified Crime Reduction Officer and Crime Prevention Design Advisor. I am the holder of the BTEC Level 3 Certificate (Security Industry Authority) – Close Protection Operative in the Private Security Industry.

I have been instructed to conduct independent observations on the venue 'PLATINUM LACE', 13 Coventry Street, London WC2. The venue is known as a 'Gentleman's club' or 'Lap Dancing' venue. The premises benefits from a Premises Licence (No 15/07927/LIPCH) and Sexual Entertainment Venue (SEV) Licence (No 17/10426/LISEVR) both issued by Westminster City Council. I had been asked to investigate the conduct of the dancers and entertainment practices.

At 2330 hours on Wednesday 11th July 2018, along with my colleague Mr Nick Mason (NM), I was in the vicinity of Platinum Lace in Coventry Street WC2. As we walked along the road we approached the entrance of the club which was on our right. I noted that at the front of the club was a token rope barrier with a gap in the middle to allow access to the club. Two security door staff were present, both dressed in black suits and displaying SIA licences. We were greeted by the door staff who asked if we had been to the premises before. Both NM and myself said that we had not and one of the door supervisors explained the rules of the club stating that no touching of the dancers was allowed, entry was £15 per person, drinks started at a cost of £6 and a dance would cost from £20.

On entering the club we walked down a set of stairs and then through a door to our left that took us into the reception area. Behind the reception area was a white female with long dark hair who was talking on the telephone. In front of the counter was a white male wearing a light coloured suit who greeted us and stated it was £15 entry fee. We waited for a short time until the woman behind the counter finished her phone call. I then paid the entry fee of £30 for the both of us. The male that had greeted us led us through the doors into the main club area and turned to the right and down into an area where there were a number of tables and chairs indicating for us to sit in this area. NM said to him that we would prefer to stand at the bar area and we walked to towards the bar area with the male who had initially greeted us leaving us to our own devices.

The bar area was to the left of the entrance we had come through and was on a higher level to the rest of the inside of the club with a number of table and chairs. In the lower area there were tables and chairs and a stage area near the bar and one at the opposite end of the club. Both stage areas had poles on and girls were dancing topless. There were a further two dance podiums to the right hand side of the club and a DJ booth on the left hand side of the club.

As we reached the bar area NM and I were immediately approached by four female dancers. NM engaged in conversation with a dancer who called herself Christina wearing a light grey dress and I spoke to a female dancer who gave her name as Penny. Penny was white, blonde hair and wearing a white dress. NM ordered two bottled beers and was charged £12. He gave me one of the bottles and I continued talking to Penny whilst he spoke to Christina. She stated she was originally from Putney but currently lived in Clapham. Penny asked me if I wanted to have a dance. I asked her how much it would be. She stated it was dependant on how long I wanted it for and explained a VIP dance was £600 which was for an hour and very intimate and a VIP for half an hour at a cost of £300. I said that was far too much money and were there cheaper dances. She told me there were dances for £20, £40 and £60 depending on what I wanted. She recommended I try a Naught Forty dance for £40. I accepted the offer. I was aware NM had already left the bar area with the female dancer Christina. Penny led me down the stairs to the lower part of the club along the right hand side to an area at the rear that had about six curtained booths. We walked past the first booth which was empty, past the second booth which contained NM and past the third and fourth booths which were also occupied. We stopped and walked back past booths four, three and two and into the first booth next to NM who was in the booth with the female dancer Christina. I sat down on a bench seat and Penny asked me to pay £40 before the dance could start. I handed her two £20 notes and I remained seated with my hands on the bench.

Penny began an erotic dance, squeezing her breasts and removing all her clothes until she was completely naked. She danced very close to me occasionally stroking my upper leg area, bringing her face close to mine, touching my face with her hand and breathing heavily. Whilst the dance took place I saw a male door supervisor walk past but say nothing. The dance lasted about five minutes. Penny then sat next to me and said if you pay a little bit more I'll give you a really close intimate dance. I said let me think about it. Penny then redressed and we walked back to the bar where we met NM and the dancer Christina. I bought two more bottles of beer for NM and myself.

Penny stayed with me at the bar and we continued to talk generally. She explained she was studying for a law degree and hoped to specialise in entertainment law. I asked her how old she was being a student and she said 28 years old. I asked about her interests and she stated she was part of a 'Women's Action Group' looking to legalise prostitution and gain 'workers rights' for dancers in lap dancing and sex venues.

Penny then turned her attention to negotiating a VIP dance. She tried to get me to have a £300 VIP dance but I declined stating I couldn't afford it. She then offered me an intimate dance for £160 which I accepted. She then led me to booths again behind the main stage area but these were off to the right. The booth was larger than the first booth she took me to. As we approached a male door supervisor asked her what type of dance she was going to do. She said a 15 minute dance. Once the door supervisor had gone she turned to me a whispered "Don't worry I get you longer". Again she asked for payment before the dance started and I handed her £160 in cash in £20 notes. I sat on the bench seat with my hands on the bench as

before. As she started to dance she forced my legs apart with her with her legs. She began to perform an erotic dance as before but this time there was physical contact as she ground her body against mine. Once she had removed her all her clothes she brushed her breasts across my forehead; and rubbed my nipples through my shirt with her hands. She faced away from me and pushed her buttocks back into my chest, then sat down in my lap grinding her buttocks into to my groin area. She straddled my upper leg and ground her buttocks on each of my upper legs in turn. At one stage she reached inside my shirt and pulled the hair on my chest. I asked her to stop this as it was painful which she did. At times she performed a floor show exposing her vagina and anus to me as she opened her legs wide. The dance lasted for 20 minutes in this format. At the conclusion of the dance she redressed and led me back to the bar area. At no time did any one door supervisor or any other member of staff challenge the behaviour which wasn't concealed in this open booth. I would describe Penny as white, 5'4", slim build, 28 years old, shoulder length blonde hair wearing a white dress.

On returning to the bar I saw NM was no longer there. Penny soon left me whilst I waited for NM to return. Looking around the club I could see there were male door supervisors patrolling the inside of the club all of whom were displaying their SIA licences.

NM then returned to the bar and joined me. We talked for a while and were again approached by a number of females who asked if we wanted a dance which we declined. We were then approached by two dancers, one was a black female with black straight bobbed hair and a white Romania female with long dark hair. Both were wearing revealing basque type black underwear. They asked if we would like a VIP dance for £300 each. We explained that was too expensive. The white female seemed to take the lead and was whispering to the black female though I could not hear what was said. She then said for £100 each we could watch them both dance and they would do a very intimate dance and a lesbian show with us both watching. NM said we didn't want to sit together and I then said I would be happy to pay £120 to watch them dance together. The white female whispered to the black female and I heard her say "£60 each". After some debate they agreed to the price. The black dancer introduced herself as Lola but then said me her real name is Christine. Lola had a London accent. I turned to the white dancer who said her name was Diana. I then asked where she was from originally and she replied Romania. After giving them my name as Stuart, they then led me once more to the back of the club where we went to booths on the right hand side.

Diana took the lead and asked me for the £120. I handed her £120 in £20 notes and she counted it and then gave Lola £60 cash and placed the other £60 in her purse. I sat down on the bench seat with my hands placed firmly on the bench. They then began an erotic dance pulling down their tops exposing their breasts and rubbing them on each other. Once they were both naked they took turns to rub my thighs with their hands and push their breasts into my face. At one stage they pushed their breasts together and put their breasts into my face. Throughout the dance they touched each other's bodies and repeatedly slapped each other on buttocks and caressed each other. They rubbed their vagina and exposed their vaginas and anus by opening their legs wide. Lola at one point said to me "Do you like my piercing?" As I looked at Lola she opened her legs and began stroking her pierced labia. After 15 minutes they stopped dancing and asked me for another £40 to continue the dance. I agreed and handed over another £40 in £20 notes. They split the money and carried on with the dance. They simulated oral sex on each other with Lola moving her mouth very close to Diana's vagina. They kissed my head and cheeks of my face as they performed the dance. At the conclusion of the dance they redressed and led me towards the bar before leaving me as they

went to look for more clients to dance for. I would describe Lola AKA Christine as black, 5'2", slim build, 28 years old, straightened bobbed hair wearing a black basque. I would describe Diana as white, Romanian, 5'4", slim build, long dark hair wearing a black basque.

I returned to the bar and spoke to NM. We were then joined by Christina again. She attempted to get NM to have a dance with her once more but he declined and she left.

NM and I had a short conversation then decided to leave the premises. As we walked out of the front of the premises I saw that there were two door supervisors who were wearing security vests on the entrance. We left the premises at 0150 hours.

With regard to the conduct of dancers and the observations, I witnessed the following in relation to the premises licence and SEV.

Premises Licence 15/07927/LIPCH

Condition 22 – No full bodily contact between dancers and customers – Breached.

Condition 29 – There shall be no indecent contact between customer and any other person within the premises – Breached.

Condition 32 – Code of Conduct (font 16) should be displayed on tables – none seen in the areas of the club I visited – breached.

SEV Licence 17/10426/LISEVR

Condition 17 – There shall be no physical between performers whilst performing – Breached.

Condition 22 – No physical contact between performers and customers – Breached.

During the course of the evening though there was physical contact involved in the dances and negotiations with the female dancers none of the female dancers who performed dances for me offered to meet outside the premises, nor did they attempt to furnish me with their contact phone numbers. I did not see any evidence of drug consumption or drug supply. I used the male toilet on one occasion. This was supervised by one black male attendant who was standing by the sink area next to the Urinals. The toilets were tidy, with paper towels available.

Throughout the night I purchased or had purchased a total of three bottles of beer. I part consumed two of these and drank the other one.

The facts of this statement are a correct account of my evenings observations and I understand that my duty is to the court and/or any such hearing and this statement has been completed in compliance with that duty. The fee for my Independent Service is not conditional on the outcome of any case brought before the courts.

Mr Stuart Jenkins

12<sup>th</sup> July 2018

**Witness Statement (CJ Act 1967.s.9,MC Act 1980, s.s.5A (3a) and 5B MC Rules 1981, r70).**

**Witness Statement of Mr Nicholas MASON**

**Dated: 12th<sup>th</sup> July 2018**

I am a former Police Officer having retired from the Metropolitan Police upon completion of over 30 years exemplary service. Throughout my Police career the majority of my service was as a Detective at different ranks. I ended my service as the Detective Chief Inspector for the Metropolitan Police Road Transport Policing Command with responsibility for leading teams in high profile pan London investigations. Prior to this role I was employed on Murder Investigation Teams with responsibility for Risk Assessment / Management leading Intelligence led operations by covert means. For a number of years I performed the role of 'On Call Senior Investigating Officer' for the Metropolitan Police Serious Crime Directorate with responsibility for advising 'fast time' best practice and investigation strategy in the most serious of incidents. I am the holder of the Chartered Management Institute level 5 Certificate in Police Management and BTEC Level 3 Certificate (Security Industry Authority (SIA) registered) – Close Protection Operative in the Private Security Industry.

I have been instructed to conduct independent observations on the venue 'PLATINUM LACE', 13 Coventry Street, London WC2. The venue is known as a 'Gentleman's club' or 'Lap Dancing' venue. The premises benefits from a Premises Licence (No 15/07927/LIPCH) and Sexual Entertainment Venue (SEV) Licence (No 17/10426/LISEVR) both issued by Westminster City Council. I had been asked to investigate the conduct of the dancers and entertainment practices.

On Wednesday 11th July 2018 at 11:30pm, along with my colleague Mr Stuart Jenkins (SJ) I was in the vicinity of Platinum Lace in Coventry Street WC2. As we walked along the road we approached the entrance of the club which was on our right. I noted that at the front of the club was a token rope barrier with a gap in the middle to allow access to the club. Two security door staff were present, both dressed in black suits and displaying SIA licences. We were greeted by the door staff who asked if we had been to the premises before. Both SJ and myself said that we had not and one of the door supervisors explained the rules of the club stating that no touching of the dancers was allowed, entry was £15 per person, drinks started at a cost of £6 and a dance would cost from £20.

On entering the club we walked down a set of stairs and then through a door to our left that took us into the reception area. Behind the reception area was a white woman with long dark hair who was talking on the telephone. In front of the counter was a white male wearing a light coloured suit who greeted us and stated it was £15 entry fee. We waited for a short time until the woman behind the counter finished her phone call. My colleague SJ then paid the entry fee for the both of us. The male that had greeted us led us through the doors into the main club area and turned to the right and down into an area where there were a number of tables and chairs indicating for us to sit in this area. I said to him that we would prefer to stand at the bar area and we walked towards the bar. The male who had initially greeted us left the area.

The bar area was to the left of the entrance we had come through, there were a number of table and chairs and the area was raised above the rest of the club. In the lower area there were tables and chairs and a stage area near the bar and one at the opposite end of the club. Both stage areas had

poles on and girls were dancing topless. As you look from the bar area to the rear of the club on the right hand side there were two smaller stage areas where dancers were performing and opposite them on the left hand side of the club was the DJ booth.

As we reached the bar area SJ and I were immediately approached by four female dancers. I engaged in conversation with a dancer who called herself Christina. I noticed SJ was talking to a blonde dancer who was in a white dress. I ordered two bottled beers for which I was charged £12. I handed one of the beers to SJ and then continued talking to Christina. She stated she was from Hungary and had been in the UK for about 3 years. She was wearing a light grey dress that was low cut revealing her upper breasts. Christina asked me if I wanted to have a dance and as she did so was pushing her breasts into my left hand side, she had blonde shoulder length hair. I asked her how much a dance was and she said there were lots of different dances, a VIP for £600 which was for an hour and very intimate and a VIP for half an hour at a cost of £300. I told her that was too expensive for me and asked if there was anything cheaper. She told me there were dances for £20, £40, £60, £80 depending on what I wanted. She then said to me why didn't I try a Naughty Forty. I agreed to this and she took hold of my hand leading me down the stairs to the lower part of the club along the right hand side and to an area at the rear that had about six curtained booths. I entered a booth where Christina asked for £40 before the dance. I handed her two £20 notes then sat down on the bench with my hands either side of me, palms down on the bench itself. As I sat down I noticed SJ entering the area from my left with the blonde girl he had been talking to, walking passed my booth and into the one to the right.

Christina began her erotic dance and removed all her clothes. She danced very close to me occasionally stroking my upper leg area, fondling her breasts and bringing her face close to mine. During the course of the dance I noted male security staff walking passed the booths but saying nothing. The dance lasted about six minutes and as it concluded Christina asked me if I wanted more. I asked her what could I get and she said if I paid £300 we could go to another area and get very intimate. I told her that was a bit much for me and that I would return to the bar area to see my friend. Christina then got dressed and walked back to the bar with me. She continued to stand very close to me pushing her breasts into my left hand side. She continued to ask if I wanted another dance and I said that we had only just arrived and I was going to have a drink and talk to my friend. While I was standing at the bar I was aware of SJ returning with the blonde dancer in the white dress. He bought two more beers and I left my original beer on the bar area half drunk. SJ then continued to talk to the blonde dancer. Christina then told me she had been called up to the dance floor to perform a dance on stage but she would come back. She then left and I saw her go to the stage nearest the bar area where she started to perform a dance.

While Christina was on stage I was aware of SJ walking off with the blonde dancer into the lower part of the club. For a short time I stood alone with a number of girls approaching me and asking if I wanted a dance which I declined.

I was then approached by a dancer who was a light skinned black female with long dark waist length hair wearing a see through dark grey dress. She said her name was Thia and asked my name. I told her it was Nick. She then asked if I wanted a dance. I asked her how much it would cost and she explained about the £600 and £300 VIP dances. I asked what you would get for that sort of money and she said it was very intimate in a different part of the club where we would not be disturbed. I said it was too

expensive for me and she said why didn't I try something a bit cheaper like a naughty forty. I asked what I would get for that and she said it would be very intimate for about 15 minutes. I agreed to this and she led me down into the lower area of the club this time accessing the same booths I had been to previously from the left hand side.

I entered the booth and Thia asked for £40 before the dance started and I handed her two £20 notes. I sat down on the bench again with my hands resting palm down. She began her erotic dance and removed all of her clothes. She continued by rubbing her breasts and vaginal area. She then got closer to me and rubbed her breasts across my face alternating each breast and pushing it into my face. Several times she sat down on my crutch area pushing down on me then standing up and rubbing her breasts in my face. While this was taking place I noted security staff walking passed but they said nothing. Upon conclusion of the dance she asked me if I wanted more and I asked her what did she mean. She said we could go for a VIP and I told her it was too expensive for me and what else could she do. She said for £100 she would take me further to the back of the club where we could get more intimate. I asked her how long that would last and she said about twenty minutes. I agreed to this and I was led around to another area where more booths were situated.

Thia asked for the £100 and I gave her five £20 notes. She then said to me why didn't I put my jacket down and take my glasses off which I did. As before I sat down on the bench with my hands on the bench face down. Thia then began to perform the same routine she had done previously removing her clothes until she was naked. During the course of this dance she repeatedly forced her breasts into my face, rubbed her crutch along my upper thigh and sat on my crutch area with her back towards me forcing down on my lap. Additionally she knelt on the floor with her arms on my legs and her head down near my crutch area though she did not make contact. During the course of this dance security staff walked passed but again nothing was said. At the conclusion of the dance which lasted about fifteen minutes Thia asked me what I did for a living. I explained that I was in the property rental market. She stated that she was looking for a new place to live but it was always difficult as she did not get payslips though she was normally able to overcome this problem by paying six months rent up front. I told her that money up front always helps. We left the booth area and Thia walked into the area near the stage at the bar while I returned to the bar area.

SJ was standing at the bar and I talked to him for a while. Again we were approached by a number of females who asked if we wanted a dance which we declined. We were then approached by two dancers, one was a black female with black straight bobbed hair and a white Romania female with long dark hair. Both were wearing revealing basque type underwear. They asked if we would like a VIP dance for £300 each. We explained that was too expensive. The white female seemed to take the lead and was whispering to the black female though I could not hear what was said. She then said for £100 each we could watch them both dance and they would do a very intimate dance and a lesbian show with myself and SJ both watching. I said we didn't want to sit together and SJ then said he'd be willing to pay £120 to watch them dance together. The white female whispered to the black female and I heard her say "£60 each". They told SJ that was acceptable and SJ walked away with them towards the back of the club leaving me at the bar.

I was approached by a white blonde female who said her name was Eleanor. She asked me if I wanted a dance and the £600 and £300 VIP dance routine was explained to me again. I told her I had already spent a lot of money and I couldn't afford a VIP dance. She asked me if I wanted a naughty forty and

I told her I had already had a naughty forty to which she replied "not with me you havn't". She then asked me to buy her a drink and continued asking for me to have a dance with her which I declined. While Eleanor was standing with me my colleague SJ returned to the bar area. I offered to buy him a drink which he declined. Eleanor asked me to buy her a sparkling water which I agreed to. I purchased another beer for myself and the sparkling water which I handed to Eleanor. The drinks cost me £10. Eleanor then walked away.

I spoke to SJ and while doing so Christina with whom I had the first dance of the night came and stood next to me. She pushed her breasts into my left arm and stroked my chest asking if I wanted another dance. I said I could'nt as I had already had several dances and had run out of money. Christina then walked away.

SJ and I had a short conversation then decided to leave the premises. As we walked out of the front of the premises I noted two door supervisors who were wearing security vests and said good night. The time of our departure from the club was 1:50am on 12<sup>th</sup> July 2018.

With regard to the conduct of dancers and observations, I note the following in relation to the premises licence and SEV.

**Premises Licence 15/07927/LIPCH**

Condition 22 – No full bodily contact between dancers and customers – Breached.

Condition 29 – There shall be no indecent contact between customer and any other person within the premises – Breached.

Condition 32 – Code of Conduct (font 16) should be displayed on tables, none seen in areas of observations – Breached.

**SEV Licence 17/10426/LISEVR**

Condition 22 – No physical contact between performers and customers – Breached.

In conclusion it is correct to say that during the course of the evening though there was physical contact involved in the dances and negotiations with the female dancers none of the women who performed dances towards me offered to meet outside the premises, nor did they attempt to furnish me with their contact phone numbers. I did not see any evidence of drug consumption. I used the Gentleman's toilet on one occasion. This was supervised by one black male who was standing by the sink area next to the Urinals. The toilets were tidy, with paper towels available.

Throughout the night I purchased or had purchased for me three bottles of beer. I left half of one of these on the bar and drank the other two.

The facts of this statement are a correct account of my evenings observations and I understand that my duty is to the court and/or any such hearing and this statement has been completed in compliance with that duty. The fee for my Independent Service is not conditional on the outcome of any case bought before the courts.

**Mr Nicholas Mason**

**12th<sup>th</sup> July 2018**

**Witness Statement (CJ Act 1967.s.9,MC Act 1980, s.s.5A (3a) and 5B MC Rules 1981, r70).**

**Witness Statement of Mr Nicholas MASON**

**Dated: 14th July 2018**

Further to my previous statement dated 12<sup>th</sup> July 2018 concerning independent observations on the venue 'PLATINUM LACE', 13 Coventry Street, London WC2, (Premises Licence Number 15/07927/LIPCH and Sexual Entertainment Venue (SEV) Licence Number 17/10426/LISEVR issued by Westminster City Council;

I have been asked to provide some clarification of times of dances that were performed at the venue during the period I maintained observation from Wednesday 11<sup>th</sup> July 2018 at 11:30pm to Thursday 12<sup>th</sup> July 2018 at 1:50am. I am only able to provide approximate times as at the time of my observations it was not possible nor appropriate to make notes during the two hours and twenty minutes I was in the premises.

In relation to the first dance I observed with the female identifying herself as 'Christina' I would estimate that this dance took place between 11:50pm (11/07/18) and 12:20am (12/07/18).

In relation to the second dance I observed with the female identifying herself as 'Thia' I would estimate that this dance took place between 12:30am and 1:15am (12/07/18).

**Mr Nicholas MASON**

**14<sup>th</sup> July 2018**

## Licensing Authority objection

## Appendix D2

Dear Ms Tricker

Please accept this email as a formal objection on behalf of the Licensing Authority against the SEV renewal application for the above premises.

The licence holder, Platinum Lace (Management) Limited, has applied to renew the Sexual Entertainment Venue licence for Platinum Lace, Unit 33 Trocadero, 13 Coventry Street, London, W1D 7AB under Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982.

Under paragraph 10(15) of that schedule, the Licensing Authority objects to this renewal application on the following grounds:

- Allegations of breaches of conditions on the SEV licence, namely conditions 17 & 22

Paragraph 12(3)(a) of Schedule 3 states that the Licensing Authority may refuse to renew the SEV licence on the grounds that the applicant is unsuitable to hold the licence by reason of having been convicted of an offence or **for any other reason** (emphasis added).

The Licensing Authority has received information from the public alleging breaches of licence conditions. It is the Licensing Authority's assertion that, pending an investigation into the allegations above, the licence holder / applicant is unsuitable to hold a licence having allegedly permitted breaches of licence conditions. The nature and severity of the alleged breaches raises serious concerns with the Licensing Authority regarding the licence holder's ability to operate the premises in line with the conditions attached to the SEV licence.

As a direct consequence of these allegations, the Licensing Authority raises this objection to the SEV licence renewal. Pending the outcome of an investigation into these allegations, the Licensing Authority reserves the right to enhance or amend this objection.

Kind regards,

Steve

**Mr Steve Rowe**  
Senior Licensing Practitioner

OFFICIAL (When Completed)

CP6



**City of Westminster**  
**WITNESS STATEMENT**

Reference Number: 18/03389/LISEVR

**STATEMENT OF WITNESS**

*(Criminal Procedure Rules, r. 16.2;  
Criminal Justice Act 1967, s. 9)*

**STATEMENT OF** John Oddi

**Age of witness:** Over 18

**This statement (consisting of 3 pages) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false, or do not believe to be true.**

I am a City inspector employed by Westminster City Council.

My line manager, Mr Francis Keegan, obtained a number of disks from the managers of Platinum Lace (Trocadero) showing images from the venue's CCTV system covering various areas within the club over three sample dates chosen by Mr Keegan at random. Platinum Lace is a strip club with both a Sexual Entertainment Venue Licence (SEVL) and a premises licence. The images were requested by Westminster City Council (WCC) because of an objection received by the City Council to the renewal of the SEVL.

I was asked to view the images obtained and to document any incidents of potential concern, especially any breaches of the "no touching" condition on the SEVL.

The CCTV images related to periods on 28 August, 12 September, and 21 September 2018.

I viewed these images on 30 October, and on 12 & 23 November 2018.

On each of the three dates, I saw numerous breaches of the "no touching" condition on the SEVL which reads:



## City of Westminster

22. Whenever Relevant Entertainment is being provided there shall be no physical contact between Performers and customers or between customers and Performers except for the exchanging of money or tokens at the beginning or conclusion of the performance and only for the purpose of that performance. Clearly legible notices to this effect shall clearly be displayed in each private booth and in any performance area.

Some of the breaches were more serious than others, but most of them were initiated by the (female) performers, rather than by the (male) customers, which suggests there may be a management problem at the venue. Please see a shortlist below of what were considered to be the most serious and significant contacts/breaches:

| Footage Date | Footage Time Frame/Disk | CCTV Camera | Event Time (hh:mm:ss) | Observation Details (in all events, female performers' breasts and genitalia are exposed and they are either scantily dressed or fully naked unless otherwise specified) Serious physical contacts recorded include situations where the customer touches the performer and the performer discourages/moves them away. In addition, contact made with male genital area and prolonged contacts are also included. |
|--------------|-------------------------|-------------|-----------------------|---|
| 12/09/2018   | 00:27-00:42             | 9CH09       | 00:34:14              | Two female performers and two male customers in one booth. Both performers indicate to the male customers the CCTV cameras. Both male customers repeatedly try to touch both performers who resist their attempts. The female performer places her left foot on the male customer's right thigh and leaves it there for seven seconds.  |
| 12/09/2018   | 00:27-00:42             | 1CH01       | 00:36:22              | The male customer holds the female performer's left ankle using his right hand for two seconds which she doesn't attempt to move away.  |
| 12/09/2018   | 00:27-00:42             | 1CH01       | 00:38:38              | Female performer straddles the male customer's right thigh and brushes her inner thighs against him for seven seconds.  |
| 12/09/2018   | 00:27-00:42             | 1CH01       | 00:38:50              | Female performer repeatedly touches the inside of the male customer's thighs using her knees for nine seconds.  |
| 12/09/2018   | 00:27-00:42             | 3CH03       | 00:36:37              | Female performer now fully naked straddles the male customer's right thigh and touches it with her crotch.  |
| 12/09/2018   | 00:27-00:42             | 3CH03       | 00:38:03              | Female performer straddles the male customer's right thigh and repeatedly brushes her crotch against his right forearm.   |
| 12/09/2018   | 00:42-00:57             | 1CH01       | 00:46:00              | Female performer places her left foot across the male customer's crotch and leaves it there for seven seconds.  |



## City of Westminster

|            |                          |       |          |   |
|------------|--------------------------|-------|----------|---|
| 12/09/2018 | 00:57-01:12              | 1CH01 | 01:03:30 | Light haired female performer places her right hand on the male customer's crotch.  |
| 21/09/2018 | 00:00-00:13<br>(1 of 15) | 1CH01 | 00:04:51 | Dark haired female performer places her right foot on the male customer's crotch and leaves it there for five seconds.          |
| 21/09/2018 | 01:27-01:39<br>(8 of 15) | 3CH03 | 01:32:28 | Topless light haired female performer with tattoo on lower back brushes her left shin and knee down the male customer's crotch. |

I recently viewed similar CCTV images at the other nearby Platinum Lace (14 Leicester Square) by prior arrangement with the owner, Mr Warr, and we did not witness any similar problems at that venue.

I have retained the disks in question and intend to attend the Licencing Sub Committee (LSC) hearing if requested to do so

I attach to this statement a summary of my findings for each of the three dates. I would advise that this was the first time I have done this exercise, and the methodology for the second and third dates was slightly different to the one use for the first date, in that for the first date I did not record all the interventions made by staff when they themselves detected a breach. This was rectified for the other two dates after receiving advice from more experienced staff.

Signed: 

Date: Thursday 7<sup>th</sup> February 2019

*To be completed if applicable (or if, not applicable please check here ):*

*Name* being unable to read the above statement I, *Name* of *Company or Address*, read it to *him or her* before *he or she* signed it.

Signed: *Name*

Date: *Date*



Schedule 12  
Part A

WARD: St James's  
UPRN: 010033554192

**City of Westminster**

64 Victoria Street, London, SW1E 6QP

Premises licence

Regulation 33, 34

Premises licence number:

15/07927/LIPCH

Original Reference:

08/07080/LIPN

**Part 1 – Premises details**

**Postal address of premises:**

Platinum Lace Gentleman's Club  
Unit 33  
Trocadero  
13 Coventry Street  
London  
W1D 7AQ

**Telephone Number:** 020 7297 3200

**Where the licence is time limited, the dates:**

Not applicable

**Licensable activities authorised by the licence:**

Performance of Dance  
Exhibition of a Film  
Performance of Live Music  
Playing of Recorded Music  
Late Night Refreshment  
Sale by Retail of Alcohol

**The times the licence authorises the carrying out of licensable activities:**

**Performance of Dance**

Monday to Saturday: 15:00 to 06:00

Sunday: 15:00 to 03:00

Non-standard Timings: From the end of permitted hours on New Year's Eve to the start of permitted hours on New Year's Day.

**Exhibition of a Film**

Monday to Saturday: 15:00 to 06:00

Sunday: 15:00 to 03:00

Non-standard Timings: From the end of permitted hours on New Year's Eve to the start of permitted hours on New Year's Day.

**Performance of Live Music**

Monday to Saturday: 15:00 to 06:00

Sunday: 15:00 to 03:00

Non-standard Timings: From the end of permitted hours on New Year's Eve to the start of permitted hours on New Year's Day.

**Playing of Recorded Music**

Monday to Saturday: 15:00 to 06:00  
Sunday: 15:00 to 03:00

Non-standard Timings: From the end of permitted hours on New Year's Eve to the start of permitted hours on New Year's Day.

**Late Night Refreshment**

Monday to Saturday: 23:00 to 05:00  
Sunday: 23:00 to 03:00

Non-standard Timings: From the end of permitted hours on New Year's Eve to the start of permitted hours on New Year's Day.

**Sale by Retail of Alcohol**

Monday to Saturday: 15:00 to 06:00  
Sunday: 15:00 to 03:00

Non-standard Timings: From the end of permitted hours on New Year's Eve to the start of permitted hours on New Year's Day.

**The opening hours of the premises:**

Monday to Saturday: 15:00 to 06:30  
Sunday: 15:00 to 03:30

**Where the licence authorises supplies of alcohol, whether these are on and/or off supplies:**

Alcohol is supplied for consumption both on and off the Premises.

**Part 2**

**Name, (registered) address, telephone number and email (where relevant) of holder of premises licence:**

Platinum Lace (Management) Limited  
Clarendon House  
Shenley Road  
Borehamwood  
Hertfordshire  
WD6 1AG  
Telephone Number : 020 7025 8132

**Registered number of holder, for example company number, charity number (where applicable)**

06619812

**Name, address and telephone number of designated premises supervisor where the premises licence authorises the supply of alcohol:**

Name: Mr Kenneth Ralph Favel

*Please note: It is the policy of the Licensing Authority not to display the address details of a designated premises supervisor.*

Personal licence number and issuing authority of personal licence held by designated premises supervisor where the premises licence authorises for the supply of alcohol:

Licence Number: 00719  
Licensing Authority: London Borough Of Ealing

Date: 30 December 2015

This licence has been authorised by Mr Yiannis Chrysanthou on behalf of the Director - Public Protection and Licensing.

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#### Annex 1 – Mandatory conditions

1. No supply of alcohol may be made at a time when there is no designated premises supervisor in respect of this licence.
  2. No supply of alcohol may be made at a time when the designated premises supervisor does not hold a personal licence or the personal licence is suspended.
  3. Every supply of alcohol under this licence must be made or authorised by a person who holds a personal licence.
  4.
    - (1) The responsible person must ensure that staff on relevant premises do not carry out, arrange or participate in any irresponsible promotions in relation to the premises.
    - (2) In this paragraph, an irresponsible promotion means any one or more of the following activities, or substantially similar activities, carried on for the purpose of encouraging the sale or supply of alcohol for consumption on the premises—
      - (a) games or other activities which require or encourage, or are designed to require or encourage, individuals to;
        - (i) drink a quantity of alcohol within a time limit (other than to drink alcohol sold or supplied on the premises before the cessation of the period in which the responsible person is authorised to sell or supply alcohol), or
        - (ii) drink as much alcohol as possible (whether within a time limit or otherwise);
      - (b) provision of unlimited or unspecified quantities of alcohol free or for a fixed or discounted fee to the public or to a group defined by a particular characteristic in a manner which carries a significant risk of undermining a licensing objective;
      - (c) provision of free or discounted alcohol or any other thing as a prize to encourage or reward the purchase and consumption of alcohol over a period of 24 hours or less in a manner which carries a significant risk of undermining a licensing objective;
      - (d) selling or supplying alcohol in association with promotional posters or flyers on, or in the vicinity of, the premises which can reasonably be considered to condone, encourage or glamorise anti-social behaviour or to refer to the effects of drunkenness in any favourable manner;
      - (e) dispensing alcohol directly by one person into the mouth of another (other than where that other person is unable to drink without assistance by reason of a disability).
  5. The responsible person must ensure that free potable water is provided on request to customers where it is reasonably available.
  6.
    - (1) The premises licence holder or club premises certificate holder must ensure that an age verification policy is adopted in respect of the premises in relation to the sale or supply of alcohol.
    - (2) The designated premises supervisor in relation to the premises licence must ensure that the supply of alcohol at the premises is carried on in accordance with the age verification policy.
-

- (3) The policy must require individuals who appear to the responsible person to be under 18 years of age (or such older age as may be specified in the policy) to produce on request, before being served alcohol, identification bearing their photograph, date of birth and either—
    - (a) a holographic mark, or
    - (b) an ultraviolet feature.
7. The responsible person must ensure that—
- (a) where any of the following alcoholic drinks is sold or supplied for consumption on the premises (other than alcoholic drinks sold or supplied having been made up in advance ready for sale or supply in a securely closed container) it is available to customers in the following measures—
    - (i) beer or cider: ½ pint;
    - (ii) gin, rum, vodka or whisky: 25 ml or 35 ml; and
    - (iii) still wine in a glass: 125 ml;
  - (b) these measures are displayed in a menu, price list or other printed material which is available to customers on the premises; and
  - (c) where a customer does not in relation to a sale of alcohol specify the quantity of alcohol to be sold, the customer is made aware that these measures are available.

A responsible person in relation to a licensed premises means the holder of the premise licence in respect of the premises, the designated premises supervisor (if any) or any individual aged 18 or over who is authorised by either the licence holder or designated premises supervisor. For premises with a club premises certificate, any member or officer of the club present on the premises in a capacity that which enables him to prevent the supply of alcohol.

- 8(i) A relevant person shall ensure that no alcohol is sold or supplied for consumption on or off the premises for a price which is less than the permitted price.
  - 8(ii) For the purposes of the condition set out in paragraph 8(i) above -
    - (a) "duty" is to be construed in accordance with the Alcoholic Liquor Duties Act 1979;
    - (b) "permitted price" is the price found by applying the formula -
 
$$P = D + (D \times V)$$
 Where -
      - (i) P is the permitted price,
      - (ii) D is the amount of duty chargeable in relation to the alcohol as if the duty were charged on the date of the sale or supply of the alcohol, and
      - (iii) V is the rate of value added tax chargeable in relation to the alcohol as if the value added tax were charged on the date of the sale or supply of the alcohol;
    - (c) "relevant person" means, in relation to premises in respect of which there is in force a premises licence -
      - (i) the holder of the premises licence,
-

- (ii) the designated premises supervisor (if any) in respect of such a licence, or
    - (iii) the personal licence holder who makes or authorises a supply of alcohol under such a licence;
  - (d) "relevant person" means, in relation to premises in respect of which there is in force a club premises certificate, any member or officer of the club present on the premises in a capacity which enables the member or officer to prevent the supply in question; and
  - (e) "value added tax" means value added tax charged in accordance with the Value Added Tax Act 1994.
- 8(iii). Where the permitted price given by Paragraph 8(ii)(b) above would (apart from this paragraph) not be a whole number of pennies, the price given by that sub-paragraph shall be taken to be the price actually given by that sub-paragraph rounded up to the nearest penny.
- 8(iv). (1) Sub-paragraph 8(iv)(2) below applies where the permitted price given by Paragraph 8(ii)(b) above on a day ("the first day") would be different from the permitted price on the next day ("the second day") as a result of a change to the rate of duty or value added tax.
- (2) The permitted price which would apply on the first day applies to sales or supplies of alcohol which take place before the expiry of the period of 14 days beginning on the second day.
9. All persons guarding premises against unauthorised access or occupation or against outbreaks of disorder or against damage (door supervisors) must be licensed by the Security Industry Authority.
10. Admission of children to the premises must be restricted in accordance with the film classification recommended by the British Board of Film Classification or recommended by this licensing authority as appropriate.
-

**Annex 2 – Conditions consistent with the operating Schedule**

None



**Annex 3 – Conditions attached after a hearing by the licensing authority**

11.\* There shall be no external advertising of the striptease entertainment either at the premises or in its immediate vicinity, however the premises can advertise their trading name and state that it is a gentlemen's club, the rules of the club may also be advertised at the entrance of the club.

12.\* No promotional material depicting nudity to be visible at the entrance to the premises.

13. On any evening where the premises or part of the premises are open for the purposes of Music and Dancing intoxicating liquor may not be sold or supplied after 23:00 to persons entering that part of the premises except

- Persons who have paid or had paid on their behalf a minimum admission fee of £10.00 such charges not to be credited against consumables
- Artists or persons employed at the premises
- Holders of the premises membership cards and corporate club cards. (Membership not to permit entry within 24 hours).
- Persons attending a private function booked at least 24 hours in advance, function organiser's name and address to be kept at reception for inspection by Police.
- Bona fide guests of the management (to be recorded in the guest book) and not to exceed 10% of capacity.

No payment to be made by or on behalf of the licensees to any person for bringing customers to the premises, directly off the street.

14. The premises are not be used by any outside promoters save those that give the Metropolitan Police 14 days notice and the Police to have absolute veto.

15. Alcohol shall not be sold for consumption off the premises.

16. The sale of intoxicating liquor shall be ancillary to the provision of striptease entertainment.

17. Door staff shall be employed at all times when the premises are open for licensable activity a minimum of two door supervisors to be employed at the entrance prior to 8pm. All door supervisors at the entrance to wear high visibility jackets.

18.\* SIA Registered supervisors shall be posted in the parts of the premises where striptease/table/lap dancing is taking place.

19. There shall be an electronic search arch installed at the premises and operated after 9pm or such times as agreed with the Metropolitan Police, every patron entering the premises to use the licensing facilities shall pass through it.

20.\* All public areas of the premises shall be sufficiently illuminated to afford SIA registered supervisors a clear view of the dancers.

21. The premises management will become members and actively participate in a pub watch scheme (or similar) if one is operating in the area of the premises.

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22.\* There shall be no full bodily contact between customers and the dancers except for the placing of money or vouchers into the hands of the dancers at the beginning or conclusion of the performance. Notices to this effect shall clearly be displayed at each table and at the entrance to the premises.

23.\* A Code of Conduct for striptease/table/lap dancing as agreed by the Police shall be signed by dancers in their proper name acknowledging that they have read and understood and are prepared to abide by the Code of Conduct. A signed copy shall be retained by the licensee and shall be readily available for inspection by the Police and/or the Licensing Authority upon reasonable request.

24.\* Dancers will not accept any telephone number, address or any other contact information from any customer. However if any customer insists on giving his/her card, it can be accepted and must be passed immediately to the duty manager for disposal.

25.\* A record shall be kept at the premises of the real names, addresses and 'stage names' of all dancers and this record shall be readily available to the Police and/or the Licensing Authority upon reasonable request.

26.\* All dancers' activities shall be conducted openly and at no time shall dancers entertain customers in areas of the premises that are screened, hidden by curtains or not in public use.

27.\* All members of the public shall remain seated in the dance area other than when they arrive, depart, visit the toilet or bar area.

28.\* Customers must remain fully clothed at all times. The dancer must not remove any of the customers' clothing at any time.

29.\* There shall be no indecent conduct between the customer and any other person within the premises.

30.\* There shall be a zero tolerance policy towards Customers who offer any payment in return for sexual favours.

31.\* At all times customers will behave in a decent and appropriate manner. Any customers not acting in accordance with these codes of conduct will (at the management's discretion) be asked to leave the premises.

32.\* A notice outlining the Code of Conduct for the customer 'as agreed with the Police' shall be positioned at the entrance, reception, bar area and table menus. It shall be of an adequate size (font 16) so that it can be easily read by the customer.

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33. There shall be no dancing by customers.

34. The supply of alcohol at tables shall be by waiter/waitress service only.

35.\* Whenever table/lap dancing/striptease is taking place no person under the age of 18 shall be admitted to the premises.

36.\* Whenever persons under the age of 18 are permitted to the premises there will be no indecent promotional material on display within the premises.

37. The premises will install and maintain a comprehensive CCTV system as per the minimum requirements of a Metropolitan Police Crime Prevention Officer that ensures all areas of the licensed premises are monitored including all entry and exit points will be covered enabling frontal identification of every person entering any light condition. All cameras shall continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises. All recordings shall be stored for a minimum period of 31 days with date and time stamping. Recordings shall be made available immediately upon the request of Police or authorised officer throughout the preceding 31 day period together with facilities for viewing.

38. All seating shall consist of tables and chairs arrangement and there shall be no cinema style seating.

39. Non-intoxicating beverages, including drinking water, shall be available during the whole of the permitted hours in all parts of the premises where intoxicants are provided.

40. An attendant shall be on duty in the cloakroom during the whole time that it is in use.

41. All emergency doors shall be maintained effectively self closing and not held open other than by an approved device.

42. The edges of the treads of steps and stairways shall be maintained so as to be conspicuous.

43. Curtains and hangings shall be arranged so as not to obstruct emergency signs.

44. The approved arrangements at the premises, including means of escape provisions, emergency warning equipment, the electrical installation and mechanical equipment, shall at all material times be maintained in good condition and full working order.

45. The means of escape provided for the premises shall be maintained unobstructed, free of trip hazards, be immediately available and clearly identified in accordance with the plans provided.

46. All exit doors shall be available at all material times without the use of a key, code, card or similar means.

47. The certificates listed below shall be submitted to the Licensing Authority upon written request.

- Any emergency lighting battery or system
  - Any electrical installation
  - Any emergency warning system
-

48. The number of persons accommodated at any one time (excluding staff) shall not exceed the following:
- Capacity of 350 (customers) until 01:00 hrs
  - Capacity of 250 (customers) from 01:00 hrs until 03:00 hours
  - Capacity of 200 (customers) after 03:00 hrs until closing time.
49. A daily log is to be maintained to ensure that any capacity limit set for the basement is recorded hourly and can be properly monitored. Information regarding the capacity will be given to an authorised officer or Police Officer on request.
50. Any special effects or mechanical installations shall be arranged and stored so as to minimise any risk to the safety of those using the premises. The following special effects will only be used on 10 days prior notice being given to the Licensing Authority where consent has not previously been given.
- pyrotechnics including fire works
  - firearms
  - lasers
  - explosives and highly flammable substances.
  - real flame.
  - strobe lighting.
51. No person shall give at the premises any exhibition, demonstration or performance of hypnotism, mesmerism or any similar act or process which produces or is intended to produce in any other person any form of induced sleep or trance in which susceptibility of the mind of that person to suggestion or direction is increased or intended to be increased.
- NOTE: (1) This rule does not apply to exhibitions given under the provisions of Section 2(1A) and 5 of the Hypnotism Act 1952.
52. All hand held electrical equipment shall be protected by a residual current device of 30 milliamps sensitivity complying with British Standard Specification 4293: 1993.
53. Flashing or particularly bright lights on or outside the premises shall not cause a nuisance to nearby properties (save insofar as they are necessary for the prevention of crime).
54. No speakers shall be located in the entrance area.
55. No noise shall emanate from the premises nor vibration be transmitted through the structure of the premises which gives rise to a nuisance.
56. The premises licence holder shall, prior to the commencement of the licensable activities authorised by this licence, use his best endeavours to establish and thereafter maintain a PCO registered taxi cab office within the premises, to be always available for patrons departing the premises, with a taxi ordering point clearly marked in the premises.
57. There will be a designated taxi marshal situated outside the premises after 1am to assist with the departure of customers from the premises.
58. All waste is to be properly presented and placed out for collection no earlier than 30 minutes before the scheduled collection times.
59. No rubbish including bottles will be moved, removed or placed in outside areas between 23:00 hours and 08:00hours.
60. A refuse store of sufficient size shall be provided.
-

61. The premises licence holder shall not advertise the premises nor its business, nor permit the advertising of the premises or business through 'flyering' and any other similar form of advertising.
62. There shall be no draught beers sold at the premises.
63. There shall be no admittance or re-admittance to the premises after 04.00am, save for persons temporarily leaving to smoke
64. Tea and coffee to be provided without charge for patrons (on request) between 04:00 and closing time.
65. Patrons leaving the premises to be escorted to waiting taxis or be provided with valet parking.

\* Conditions indicated shall not apply when a Sexual Entertainment Licence is in effect at the premises

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**Annex 4 – Plans**

Attached





**City of Westminster**  
64 Victoria Street, London, SW1E 6QP

Schedule 12  
Part B

WARD: St James's  
UPRN: 010033554192

Premises licence  
summary

Regulation 33, 34

Premises licence number:

15/07927/LIPCH

**Part 1 – Premises details**

**Postal address of premises:**

Platinum Lace Gentleman's Club  
Unit 33  
Trocadero  
13 Coventry Street  
London  
W1D 7AQ

**Telephone Number:** 020 7297 3200

**Where the licence is time limited, the dates:**

Not applicable

**Licensable activities authorised by the licence:**

Performance of Dance  
Exhibition of a Film  
Performance of Live Music  
Playing of Recorded Music  
Late Night Refreshment  
Sale by Retail of Alcohol

**The times the licence authorises the carrying out of licensable activities:**

**Performance of Dance**

Monday to Saturday: 15:00 to 06:00  
Sunday: 15:00 to 03:00

Non-standard Timings: From the end of permitted hours on New Year's Eve to the start of permitted hours on New Year's Day.

**Exhibition of a Film**

Monday to Saturday: 15:00 to 06:00  
Sunday: 15:00 to 03:00

Non-standard Timings: From the end of permitted hours on New Year's Eve to the start of permitted hours on New Year's Day.

**Performance of Live Music**

Monday to Saturday: 15:00 to 06:00  
Sunday: 15:00 to 03:00

Non-standard Timings: From the end of permitted hours on New Year's Eve to the start of permitted hours on New Year's Day.

**Playing of Recorded Music**

Monday to Saturday: 15:00 to 06:00

Sunday: 15:00 to 03:00

Non-standard Timings: From the end of permitted hours on New Year's Eve to the start of permitted hours on New Year's Day.

**Late Night Refreshment**

Monday to Saturday: 23:00 to 05:00

Sunday: 23:00 to 03:00

Non-standard Timings: From the end of permitted hours on New Year's Eve to the start of permitted hours on New Year's Day.

**Sale by Retail of Alcohol**

Monday to Saturday: 15:00 to 06:00

Sunday: 15:00 to 03:00

Non-standard Timings: From the end of permitted hours on New Year's Eve to the start of permitted hours on New Year's Day.

**The opening hours of the premises:**

Monday to Saturday: 15:00 to 06:30

Sunday: 15:00 to 03:30

**Where the licence authorises supplies of alcohol, whether these are on and/or off supplies:**

Alcohol is supplied for consumption both on and off the Premises.

**Name and (registered) address of holder of premises licence:**

Platinum Lace (Management) Limited  
Clarendon House  
Shenley Road  
Borehamwood  
Hertfordshire  
WD6 1AG

**Registered number of holder, for example company number, charity number (where applicable)**

06619812

**Name of designated premises supervisor where the premises licence authorises for the supply of alcohol:**

Name: Mr Kenneth Ralph Favel

**State whether access to the premises by children is restricted or prohibited:**

Prohibited

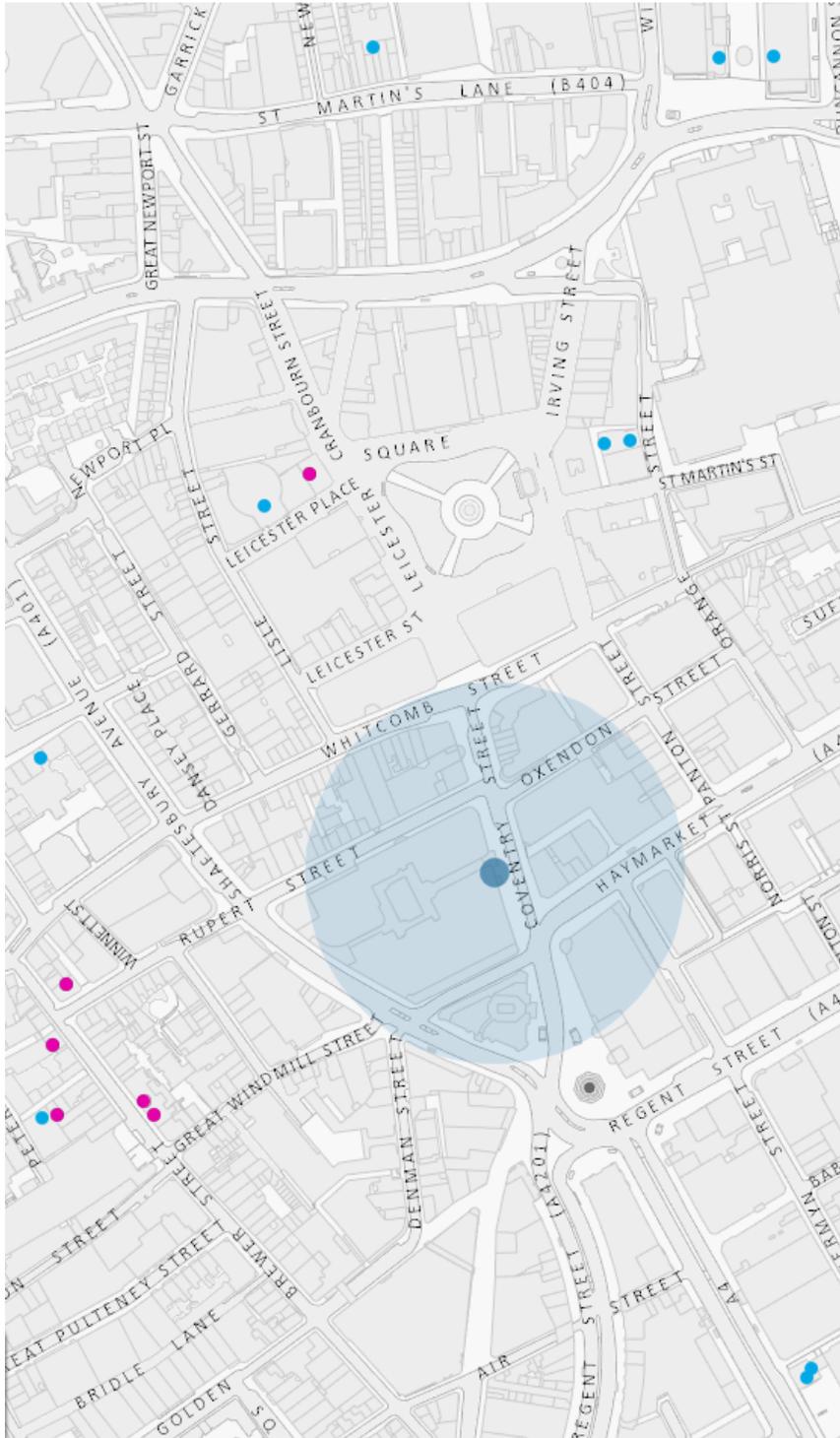
Date: 30 December 2015

This licence has been authorised by Mr Yiannis Chrysanthou on behalf of the Director -  
Public Protection and Licensing.

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**Map of locality**

**Appendix F1**



-  = Sex establishment
-  = Faith groups