

Tom Lewis

From: Tom Lewis
Sent: 29 August 2019 16:47
To: [REDACTED]
Subject: Whites Gentleman's Club, 32-38 Leman Street, London - Ref: C/096045
Attachments: CCTV.footage.furtherissues.Whites.Aug2019.pdf

Dear Mr Dadds,

Please find attached letter which has been sent to your client today in regards to the above premises.

Kind regards

Tom Lewis MCIEH | Team Leader | Licensing & Safety Team | Environmental Health and Trading Standards

London Borough of Tower Hamlets | John Onslow House, 1 Ewart Place, London E3 5EQ

☎ 020 7364 0375 | 🖨 020 7364 6901 | General Enquiries: 020 7364 5008



PLACE Directorate

Whites Venues Limited
Whites Gentleman's Club
32-38 Leman Street
London
W1 8EW

Head of Environmental Health and Trading
Standards: **David Tolley**

John Onslow House
1 Ewart Place
London E3 5EQ

Tel 020 7364 0375
Fax 020 7364 6901
Enquiries to: **Tom Lewis**

Email: Tom.lewis@towerhamlets.gov.uk

Date: 29th August 2019

www.towerhamlets.gov.uk

Ref: C/096045

Dear Sir/Madam,

**Re: Whites Gentleman's Club, 32-38 Leman Street, London W1 8EW
Local Governmental (Miscellaneous Provisions) Act 1982 as amended by the
Policing and Crime Act 2009**

I write in connection with the CCTV you provided as per my request dated 13th June and 2nd July 2019.

As you may recall you provided CCTV recordings from 23rd/24th May 2019, 23:00 to 01:30 for all VIP rooms within the above venue. I have since looked through this CCTV in view of checking if the operatives undertaking the Test Purchase visit appear elsewhere in any of this footage, and cannot find anything further in relation to this. However am concerned to find incidents of touching occurring between customer and performer within this CCTV footage. These incidents occur in the following rooms/times:

1. Office VIP Room, Time: 23:00 to 23:29 hours (23rd May 2019),
Examples of touching include customer rubbing performers back, arms around performers waist in an embrace, performer straddling customer and leaning over him, etc.
2. Moulin Rouge VIP, Time: 23:00 to 23:15 hours (23rd May 2019),
Examples of touching include customer hands on performer's bottom and thighs, Performer straddles customer with bottom in customers crotch area, performer wrapping legs around customer, with customer holding performer, etc.

Further to the above incidents of touching I have some other concerns, namely that the CCTV provided by you does not adequately show the whole of the room in the following VIP Rooms. In fact the CCTV footage provided appears to show other dancing taking place in these rooms which are out of sight of the CCTV camera. This can be seen because parts of the customers/performers bodies can be seen and/or they can be seen leaving the room from an area not shown in the CCTV footage.

- a) Office VIP Room – only sofa can be seen yet there is clearly two performers and one customer the other side of the table throughout the time the customer and performer on the sofa are in the room.
- b) Moulin Rouge VIP Room – can only see dances occurring on Chaise Longue, yet clearly there are two performers and one male below where the chaise longue is on the CCTV footage who are present throughout the time the performer and customer on the chaise longue are present.
- c) Royal Suite VIP Room – Performers and customers can be seen coming into the room and appearing to sit out of view of the CCTV (bottom of the footage), yet dances are appearing to take place here.

In addition to this, looking at the receipts you provided for the rooms at the same time as you provided the CCTV footage, these do not appear to show all the people in the rooms. For example in the Office VIP there are clearly two customers in there but only one appears on the receipt. The same is true for Moulin Rouge VIP, where there are two customers in the room, yet receipt indicates one customer. There also appears to dances taking place in the Royal Suite where there are no receipts provided.

Finally the quality of the footage particularly within the Office VIP Room does not appear adequate to clearly identify someone should the need arise.

I would also mention that I have yet to receive the items mentioned in my letter to you on 16th August 2019, which were as follows:

- staff logs of who was working on the night of 23/25th May 2019 or any security logs for that night,
- till receipts for payments made in relation to private dances between the hours of 23:00 and 01:30 hours.

I look forward to receiving the requested documents, and would welcome your comments on my concerns raised above.

Yours sincerely,



Tom Lewis
Team Leader – Licensing and Safety Team
Environmental Health and Trading Standards

Cc Mr David Dadds, Dadds LLP Licensing Solicitors, via email



Tom Lewis

From: Tom Lewis
Sent: 16 August 2019 16:01
To: [REDACTED]
Subject: Whites Gentleman's Club, 32-38 Leman Street, London - Ref: C/096045
Attachments: CCTV Followup.Whites.Aug2019.pdf



Dear Mr Dadds,

Please find attached letter sent to Whites Venues Limited today.

Kind regards

Tom Lewis MCIEH | Team Leader | Licensing & Safety Team | Environmental Health and Trading Standards

London Borough of Tower Hamlets | John Onslow House, 1 Ewart Place, London E3 5EQ

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Tel 020 7364 0375
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Enquiries to: **Tom Lewis**

Email: Tom.lewis@towerhamlets.gov.uk

Date: 16th August 2019

www.towerhamlets.gov.uk

Ref: C/096045

Dear Sir/Madam,

**Re: Whites Gentleman's Club, 32-38 Leman Street, London W1 8EW
Local Governmental (Miscellaneous Provisions) Act 1982 as amended by the
Policing and Crime Act 2009**

I write further to mine and my colleague, Kathy Driver's visit to your premises on Thursday 18th July 2019 where we met with David Dadds, Solicitor, Mohamed Yassin Baboo, Manager, and Alan who manages the Finances.

During the visit we were shown and provided copies of the CCTV for all VIP rooms to the night of 23rd/24th May 2019. Also provided was a breakdown of the use of the VIP rooms for this night and six receipts relating to the use of the VIP Rooms for this night.

CCTV recordings viewed of all the VIP rooms for the night of 23rd/24th May 2019, when the Test Purchase Operatives state they were a VIP room (between 00:15 and 00:50 hours), showed nobody having a private dance within any of the VIP rooms (Office, Russian Romanov, Chapel, Mulan Rouge, and Royal Suite).

During the visit we asked about the CCTV for the private dance areas, namely the booths/cubicles where the private dances take place. We were informed by Mr Dadds and Mr Baboo that they had not retained this CCTV and so were not able to provide a copy or allow is to view.

I am disappointed that given the two letters sent to you on 13th June and 2nd July 2019 requesting this CCTV you failed to retain and provide copies of this CCTV covering the booths/cubicles. Furthermore this is as you are aware a breach of Condition 12 the Conditions Standard attached to your Sexual Entertainment Licence, as you have failed upon request to make the recordings of this CCTV available for viewing.

In connection with the six receipts for the VIP Rooms and break down of the use of the VIP Rooms, I note that in this information provided there is nothing to indicate staff logs of who was working on the night of 23/25th May 2019 or any security logs for that night, please therefore could you send these to me within 7 days of the date of this letter. Furthermore as discussed during our site meeting on 18th June 2019 please can you send me, within 7 days of the date of this letter the till receipts for payments made in relation to private dances between the hours of 23:00 and 01:30 hours.

I look forward to receiving the requested documents.

Yours sincerely,



Tom Lewis

Team Leader – Licensing and Safety Team

Environmental Health and Trading Standards

Cc Mr David Dadds, Dadds LLP Licensing Solicitors, via email



Tom Lewis

From: Tom Lewis
Sent: 02 July 2019 16:19
To: [REDACTED]
Subject: CCTV Retention Letter Whites.July2019
Attachments: CCTV Retention Letter Whites.July2019.docx



Dear Mr Dadds,

Please find attached letter attached, in relation to this Authorities request for CCTV and Staff Logs.

Kind regards

Tom Lewis MCIEH | Team Leader | Licensing & Safety Team | Environmental Health and Trading Standards

London Borough of Tower Hamlets | John Onslow House, 1 Ewart Place, London E3 5EQ

 020 7364 0375 |  020 7364 6901 | General Enquiries: 020 7364 5008



PLACE Directorate

Whites Venues Limited
Whites Gentleman's Club
32-38 Leman Street
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W1 8EW

Head of Environmental Health and Trading
Standards: **David Tolley**

John Onslow House
1 Ewart Place
London E3 5EQ

Tel 020 7364 0375
Fax 020 7364 6901
Enquiries to: **Tom Lewis**

Email: Tom.lewis@towerhamlets.gov.uk

Date: 2nd July 2019

www.towerhamlets.gov.uk

Ref: TLWGC/SEV

Dear Sir/Madam,

**Re: Whites Gentleman's Club, 32-38 Leman Street, London W1 8EW
Local Governmental (Miscellaneous Provisions) Act 1982 as amended by the
Policing and Crime Act 2009**

I write further to my letter dated 13th June 2019 in relation to an investigation into a breach of your Sexual Entertainment Venue Licence, dated 4th September 2018, granted by this authority under the above legislation.

In order to investigate this breach of your premises licence this Authority requested copies of CCTV recordings and staff logs from you as the Licence Holder. As I am sure you are aware it is a condition of your Licence, namely conditions 12, 28 and 29, to provide such information to this Authority when requested.

We have still not received any of the requested information or been advised when we could collect it from the venue. I have been advised by your Solicitor Mr Dadds that you have retained the information, namely the CCTV recordings, though as yet have not been given a date for when this will be made available to this Authority.

As stated in my previous letter, condition 12 of your Licence stipulates as follows:

'All cameras shall continually record whilst the Premises are open to the public and the recorded images shall be kept available for a minimum of 31 days. Recorded images shall be made available to an authorised officer together with facilities for viewing. The recordings for the preceding 2 days shall be made available immediately upon request. Recordings outside this period shall be made available on 24 hours' notice.'

Conditions 28 and 29 of your licence stipulates:

'The Licensee shall keep a record of each performer, including their proper name and any aliases, and their residential address. With each record the Licensee shall keep a copy of a photographic form of identity and proof of address of the performer. With each record the Licensee shall keep a clear copy of an authorised document demonstrating that each Performer and each member of the staff is entitled to work within the UK. A clear copy of this record shall be kept on the Premises at all times and be made immediately available for inspection by authorised officers;

On days when sexual entertainment is provided, the Licensee or their representative shall keep a record of those performers working at the Premises on that day in a daily record. The daily record shall be retained securely for at least 31 days and shall be made immediately available for inspection by authorised officers'

For reference the term 'authorised officer' is defined to include 'officers of the Borough Council'.

In light of this Officers from this Authority will visit your premises on Wednesday 10th July 2019 at 16:00 hours to collect the CCTV recordings and staff logs previously requested as per below. Please make sure that someone is present to provide these CCTV recordings to these Officers.

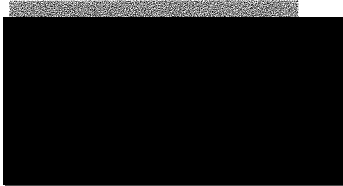
Copies of all CCTV recordings from **Thursday 23rd May 23:00 hours to Friday 24th May at 01:30 hours serving the below**. Please make sure that recordings are viewable by date and time.

1. All private dance areas serving the booths/cubicles where private dances take place.
2. All VIP rooms where a "Standard Package" is offered or there was a Russian Themed Room on the days/times detailed above.

Copies of staff logs for the above dates/time, including security, management and dancers.

Failure to comply with this authority's requests as stated above will be considered a contumacious refusal to comply with the licensing condition and this authority reserves the right to take enforcement action where necessary for the non-compliance with your licence conditions.

Yours sincerely,



Tom Lewis

Team Leader – Licensing and Safety Team

Environmental Health and Trading Standards

Cc Mr David Dadds, Dadds LLP Licensing Solicitors, via email



PLACE Directorate

Whites Venues Limited
Whites Gentleman's Club
32-38 Leman Street
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W1 8EW

Head of Environmental Health and Trading
Standards: **David Tolley**

John Onslow House
1 Ewart Place
London E3 5EQ

Tel 020 7364 0375
Fax 020 7364 6901
Enquiries to: **Tom Lewis**

Email: Tom.lewis@towerhamlets.gov.uk

Date: 13th June 2019

www.towerhamlets.gov.uk

Ref: TL/WGC/SEV

Dear Sir/Madam,

**Re: Whites Gentleman's Club, 32-38 Leman Street, London W1 8EW
Local Governmental (Miscellaneous Provisions) Act 1982 as amended by the
Policing and Crime Act 2009**

I write in response to an investigation into a breach of your Sexual Entertainment Venue Licence, dated 4th September 2018, granted by this authority under the above legislation.

The breach was discovered during a mystery shopper operation within the premises on 23rd May 2019.

As you are aware, Condition 12 of the Tower Hamlets Standards Conditions on your licence state:

Without prejudice to condition 13 below CCTV shall be installed to cover the inside and the outside of the Premises, covering all public areas, including private performance areas and booths, entrances and exits, but excluding the interior of toilets. All cameras must be maintained in working order. All cameras shall continually record whilst the Premises are open to the public and the recorded images shall be kept available for a minimum of 31 days. Recorded images shall be made available to an authorised officer together with facilities for viewing. The recordings for the preceding 2 days shall be made available immediately upon request. Recordings outside this period shall be made available on 24 hours' notice;

In response to the investigation please retain and provide us with copies of all CCTV recordings from **Thursday 23rd May 23:00 hours to Friday 24th May at 01:30 hours serving the below**. Please make sure that recordings are viewable by date and time.

1. All private dance areas serving the booths/cubicles where private dances take place.
2. All VIP rooms where a "Standard Package" is offered or there was a Russian Themed Room on the days/times detailed above.

Please also provide copies of staff logs for these dates/time, including security, management and dancers in line with conditions 28 and 29:

The Licensee shall keep a record of each performer, including their proper name and any aliases, and their residential address. With each record the Licensee shall keep a copy of a photographic form of identity and proof of address of the performer. With each record the Licensee shall keep a clear copy of an authorised document demonstrating that each Performer and each member of the staff is entitled to work within the UK. A clear copy of this record shall be kept on the Premises at all times and be made immediately available for inspection by authorised officers;

On days when sexual entertainment is provided, the Licensee or their representative shall keep a record of those performers working at the Premises on that day in a daily record. The daily record shall be retained securely for at least 31 days and shall be made immediately available for inspection by authorised officers;

Please advise me of a convenient time in which we can collect these recordings on the afternoon of either Wednesday or Friday, 19th and 21st June respectively.

Yours sincerely,



Tom Lewis
Team Leader – Licensing and Safety Team
Environmental Health and Trading Standards