



**METROPOLITAN
POLICE**

TOTAL POLICING

**Tower Hamlets Borough
Licensing Office**

Ms Kathy Driver,
Principal Licensing Officer,
London Borough of Tower Hamlets,
Licensing Section,
Mulberry Place,
5 Clove Crescent,
London,
E14 2BG

**Limehouse Police Station,
West India Dock Road,
London,
E14 8EZ**

**Office: 020 8721 2324
Mobile: 07825 850 906**

Email: Brendan.O'Rourke@met.pnn.police.uk

**Your ref:
Our ref: LIC/MUHIB-01/15**

10th February 2015

Cc x 2 - The Director/s,
Curry Choice Ltd / The Copper Chimney
Muhib Indian Cuisine
73 Brick Lane
LONDON
E1 6QL

Dear Ms Driver,

**Re: Further Evidence in the Sec 51 Licensing Act Review Application of
Mubib, 73, Brick Lane, LONDON E1 6QL**

Further to the application made by police on 06/02/14 and in particular to the references made of the '53' hits for '73 Brick Lane' (20) and 'Muhib' (33) on police indices, I have now had an opportunity to review them all and herein enclose further supporting evidence prior to the end of the consultation period. I apologise that I was unable to include these in the original submission. I may add that of the 33 search returns for 'Muhib', some were duplications and the majority referred to the forename or surname and had no links to the restaurant as such.

I firstly note that an application has been made to transfer the premises licence on 23/01/15 from 'Curry Choice Limited' (director Elias MIAH), to 'Copper Chimney Limited' (director Abdul AHAD), a company incorporated on 02/10/14.

The Committee will note, that whilst police have not objected to the transfer - Mr AHAD is already mentioned several times in the original review application. He has come to police attention several times through incidents at City Spice (138, Brick Lane) or Muhib. The police are unable to comment on his role as a company director as there is nothing barring him from being such. I would however suggest, he has already demonstrated on more than one occasion his inability to carry out the function of a Premises Licence Holder (PLH). Whatever the purpose of the transfer after these proceedings were instigated is unclear (evade a review?). If anything, one would have expected a different PLH and not Mr AHAD in any event; I cannot see how it helps his cause? It is hardly a 'fresh start' or a proper change of management for the venue.

- **Sunday - 08/09/13 - CAD 6201/08SEP13** - This matter has already been covered in the original application and discussed at the earlier Committee hearing 06/02/14 (when the Committee declined to view the CCTV). But I would wish to present to the Committee six CCTV stills. The levels of violence emanating out of Muhib that afternoon was nothing short of horrendous. I will bring colour copies to the Committee hearing, as I am conscious photocopying does no justice to the quality.

Photo 1 - (16:06:14 11) - Shows a mixture of waiters and chefs who have exited directly out of Muhib chasing 4 males south down Brick Lane. The waiter in the middle of the street has a tandoor skewer in his right hand and is arched back, about to hit a victim.

Photo 2 - (16:06:16 02) - Shows one waiter/chef in a high flying kick, whilst five suspects attack two victims at once. One victim has fallen to the floor.

Photo 3 - (16:06:22 06) - Shows one victim trying to cover his face whilst (this corresponds to one of the loud skull cracks on the mobile phone footage), whilst another suspect has a raised bottle in his hands and another a food ladle.

Photo 4 - (16:06:25: 00) - Shows one victim on the floor trapped against a car and it can be clearly seen that the suspect with the tandoor skewer has raised it as high as he can for maximum pain/damage (and indeed proceeds to hit him).

Photo 5 - (16:06:26 04) - The victim on the floor against the car is still being beaten, whilst another on the left pavements falls (receiving a kick from the 'tout'). Another suspect is still running south with a bottle raised above his head.

Photo 6 - (16:06:30 04) - The victim trapped against the car is still being beaten by a waiter and a male believed to be a chef.

ANNEX 1, 2, 3, 4, 5, & 6.

- **Friday - 22/11/13 - East London Magistrates Court** - Mr AHAD is convicted of a breach of the Licensing Act 2003 - Fined £50, £300 costs and £15 victim surcharge.
- **Friday - 13/12/13 - Section 4 Public Order - outside 69, Brick Lane - CAD 11091/13DEC13; CRIS 4232938/13** - Mr Elias MIAH is a witness to the verbal abuse of staff working in a nearby restaurant and offers to make a statement to police. CID was unable to contact him throughout the following morning as he does not answer his phone. Suspect was cautioned the following day, having being held in custody overnight. I believe a statement was not ultimately needed as further evidence, due to a caution being accepted.
- **Tuesday - 04/02/14 @ between 17:15 - 18:30 hrs - Re: "Christian Patrols" on 31/01/14 - Brick Lane' - CRIMINT HTRT00396883 - PC 459HT PRINGLE and PCSO 7256HT DAVIES** visited various Brick Lane restaurants after a report of males dressed in khaki camouflaged clothing were seen handing out leaflets against 'Sharia law'. Both officers, amongst others, speak to Mr ALI at MUHIB (no comments recorded) and Mr Abdul AHAD at City Spice, 138 Brick

Lane, who told them "I AM NOT A POLITICAL PERSON AND DON'T CARE AS LONG AS I GET ME FIVE HOLIDAYS A YEAR".

- **Wednesday - 21/05/14 @ 19:13 hrs - CAD 4812/21MAY14 - 'Malicious Communication'** at Muhib - Mr Elias MIAH states that he has been receiving prank phone calls to the restaurants landline in which the caller threatens to 'go to the restaurant and burn it and kill all the staff'. It started the previous evening and number approximately 20. The Duty Officer is advised of the seriousness of 'threats to kill', but there are no units free to attend the location. Matter closed at 01:56 hrs when Mr MIAH was last spoken to with no further incidents.
- **Wednesday - 30/07/14 @ 22:21 hrs - CAD 10847 - Disturbance at 73 Brick Lane** - three plain clothed police officers, PC 990HT WARLOW, PC 814HT RODGERS and PC 291HT O'ROURKE (undertaking 'outing' patrols in Brick Lane) are drawn to a disturbance at Muhib, but it appears to be 'handbags at dawn' and no allegations are made, the matter was resolved with no offences disclosed.
- **Friday - 01/08/14 @ 21:10 hours - Breach of Licensing Act 2003 (at City Spice, 138 Brick Lane)**, where Mr Abdul AHAD claims to be 'designated DPS' - He treats the police with contempt and the whole incident is nothing short of a pantomime. A file has been submitted for prosecution and is currently with the LBTH Legal Department awaiting the consideration of a summons being issued. I enclose supporting statements from PC 291HT O'ROURKE and MSC 5312HT RIDOUT and copies of police forms 'Notification of alleged offences under the Licensing Act 2003' and a 'Closure Notice - Section 19 Criminal Justice and Police Act 2001'.

In ANNEX 7, 8 & 9

- **Monday - 06/10/14 - Allegations of Harassment by Muhib towards Preem, 118-124 Brick Lane CRIMINT HTRT00407984** - Muhib are named in legal documents already presented to this Committee on 07/10/14 to give

undertaking or action would be taken in Bow County Court or the High Court. The allegations are broad and general - but it is alleged by Mr Azmal HUSSAIN that Mr AHAD was involved in an incident on 11/06/14 involving 'touting rivalry' and that he and his staff was threatened. The document is quite extraordinary and astounded Metropolitan Police counsel, not least for the admissions that Mr HUSSAIN himself makes. **ANNEX 10**

- **13/12/14** - Incident already covered in the main review application - however I attach a supporting statement from PC 700HT PANDHAL. **ANNEX 11**

The footage from the incident still awaits forensic analysis at great cost and time (numerous visits) at a specialist CCTV unit south of the river. As this is the footage that has ultimately instigated I would strongly urge the Committee to view the footage during the hearing. Either way I will produce some CCTV stills too.

The police would further repeat the request that the Committee consider revoking the premises licence. Whichever company or director runs it, whether Mr MIAH or Mr AHAD, neither can be trusted to run a business professionally, nor uphold the Licensing Objectives.

If you have any further questions about the above, please don't hesitate to contact me.

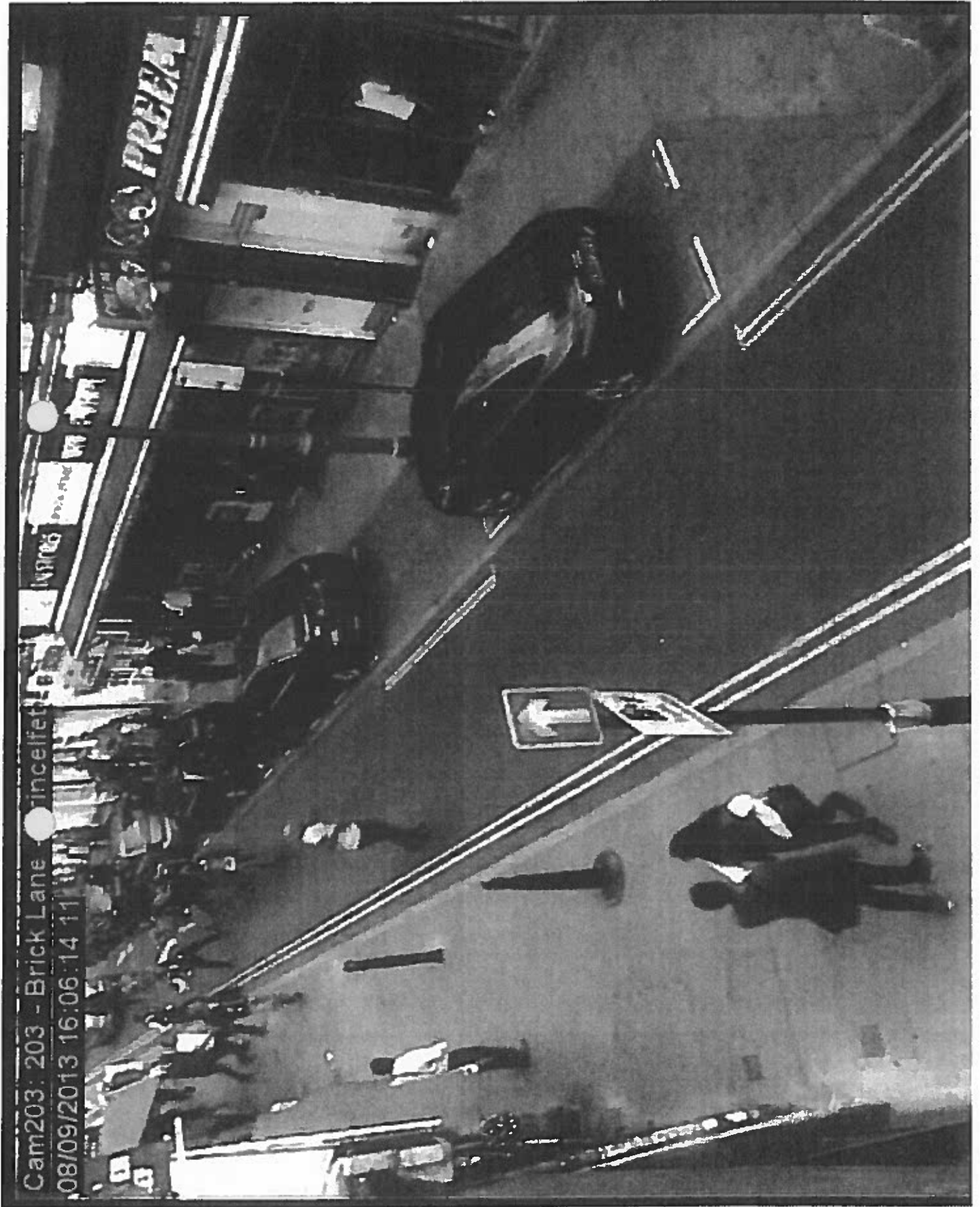
Yours sincerely,



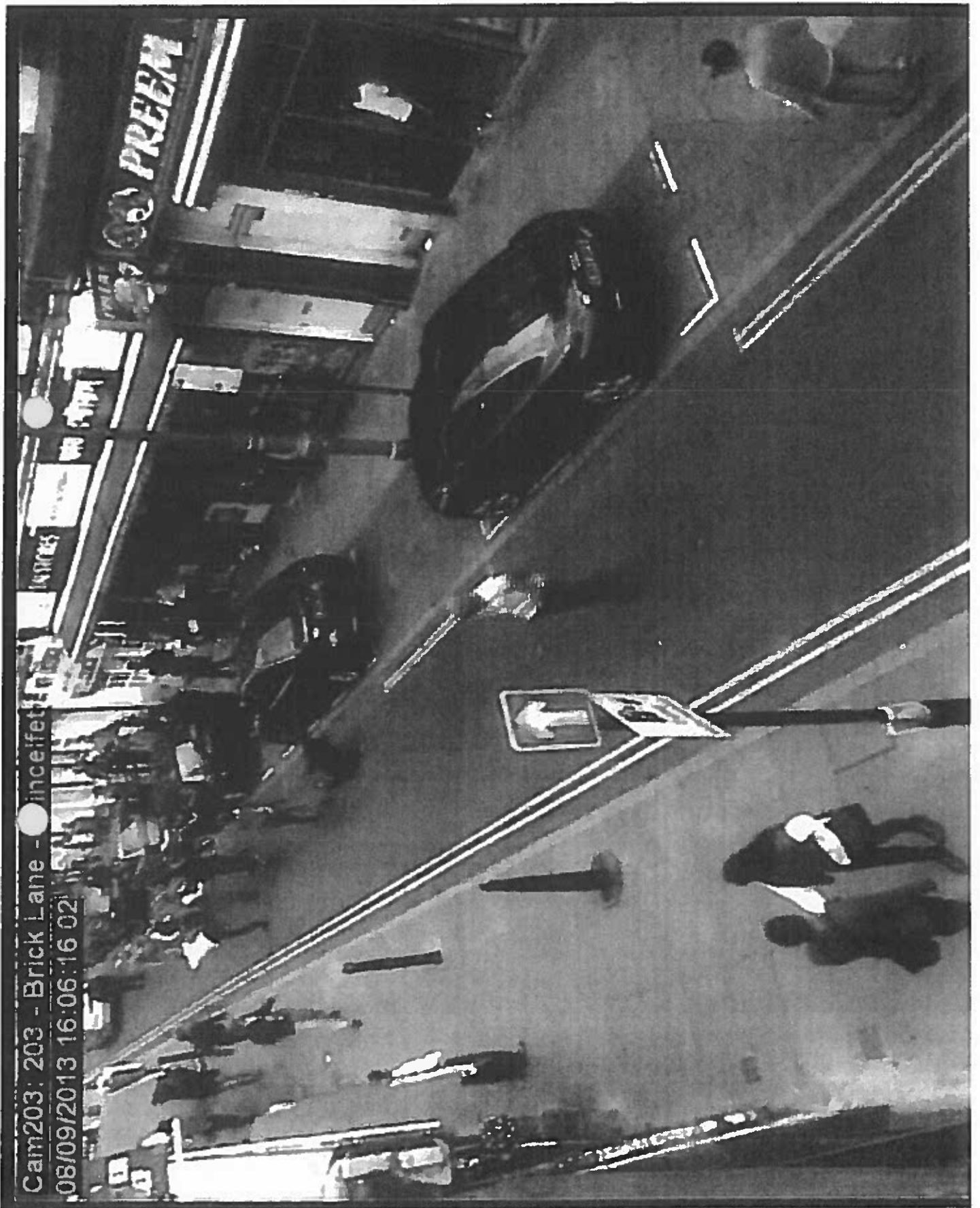
Brendan O'Rourke

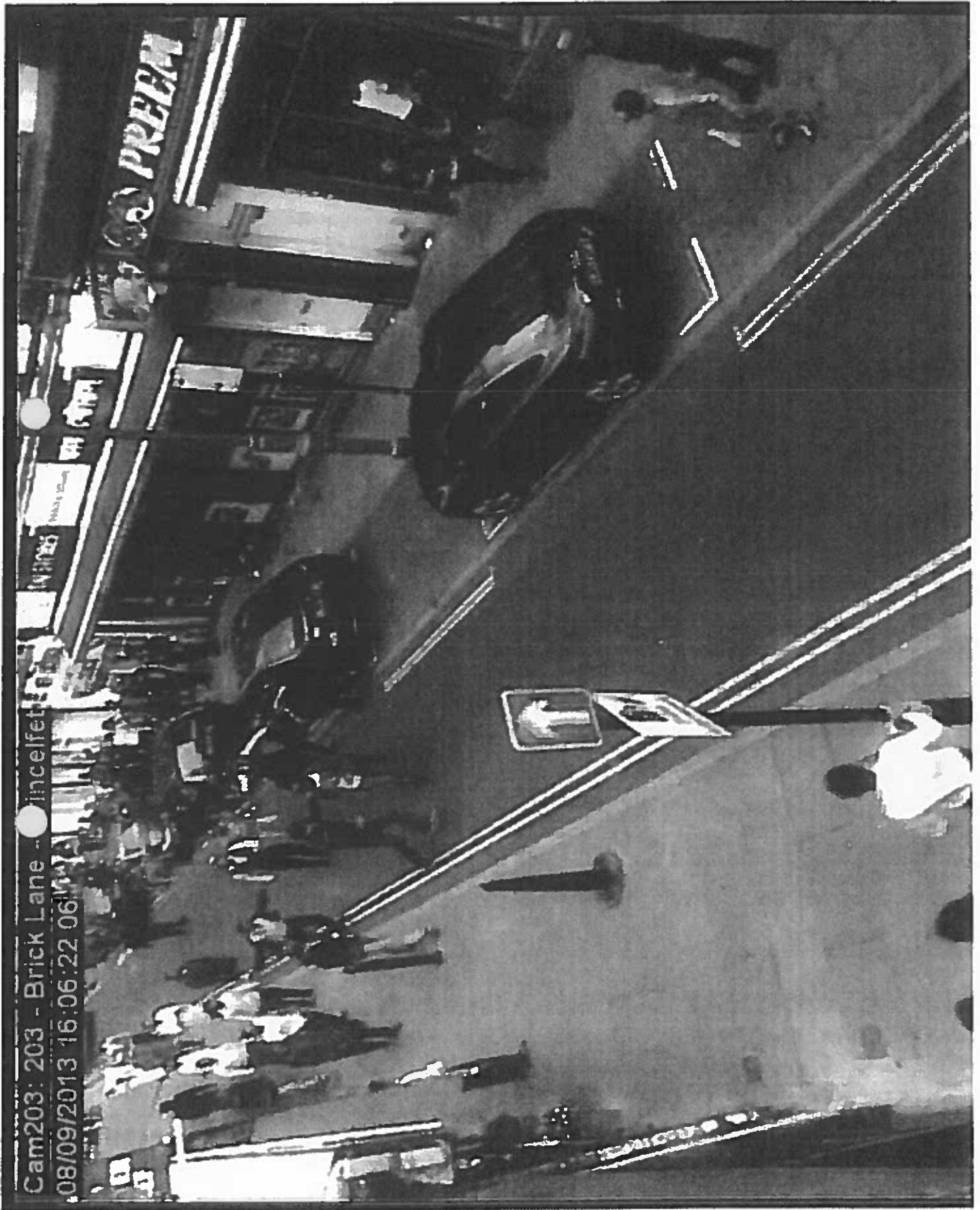
PC 291 HT



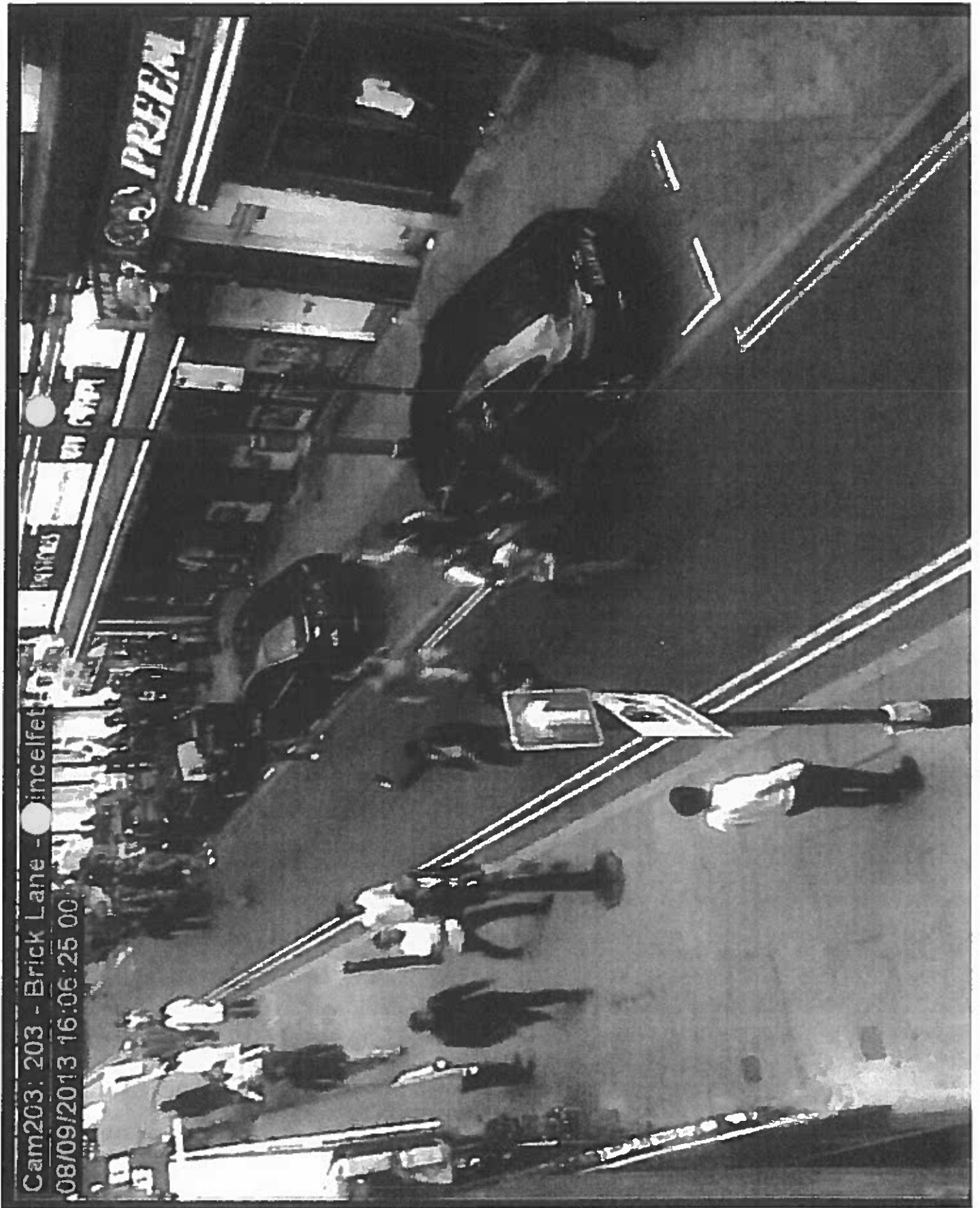




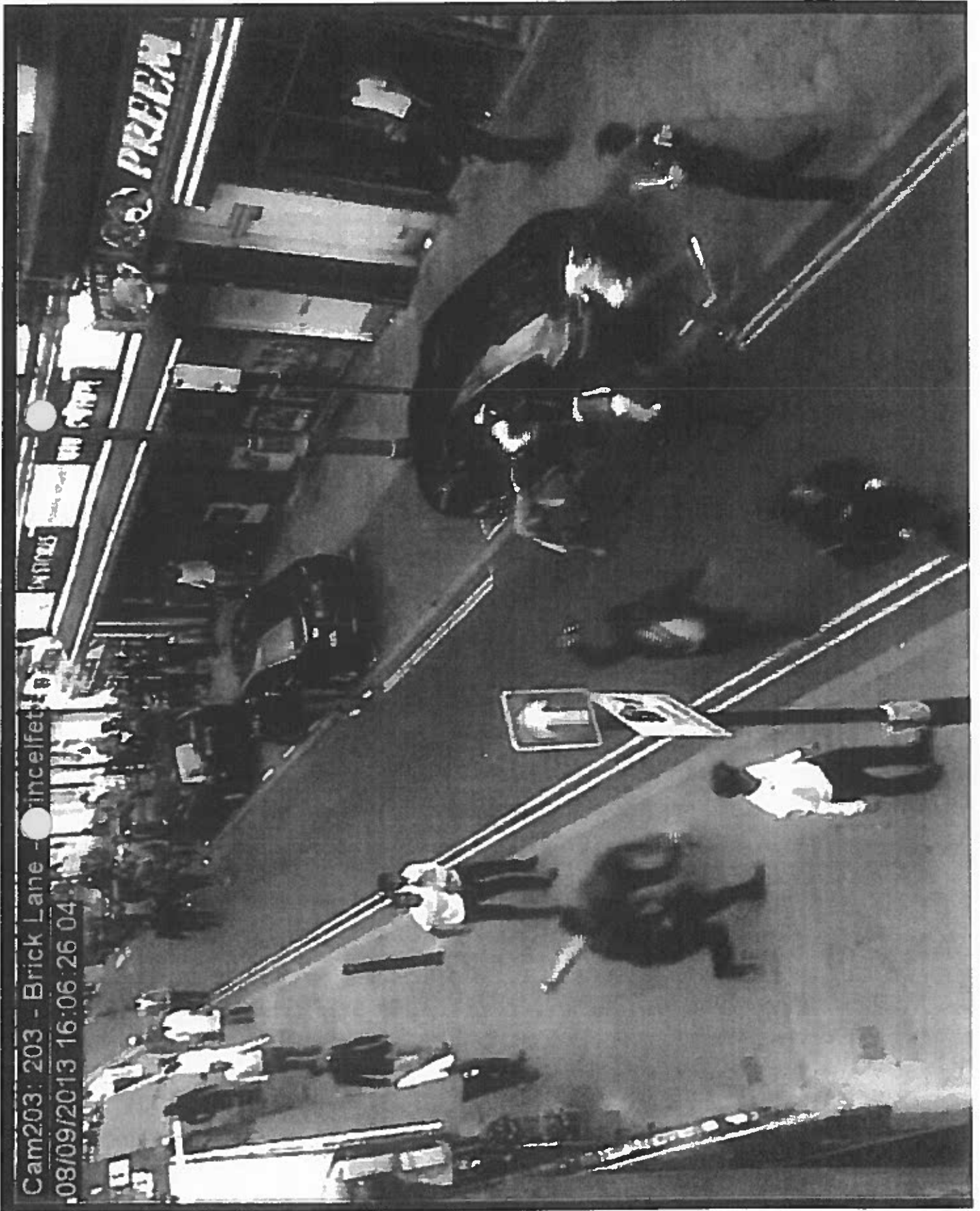




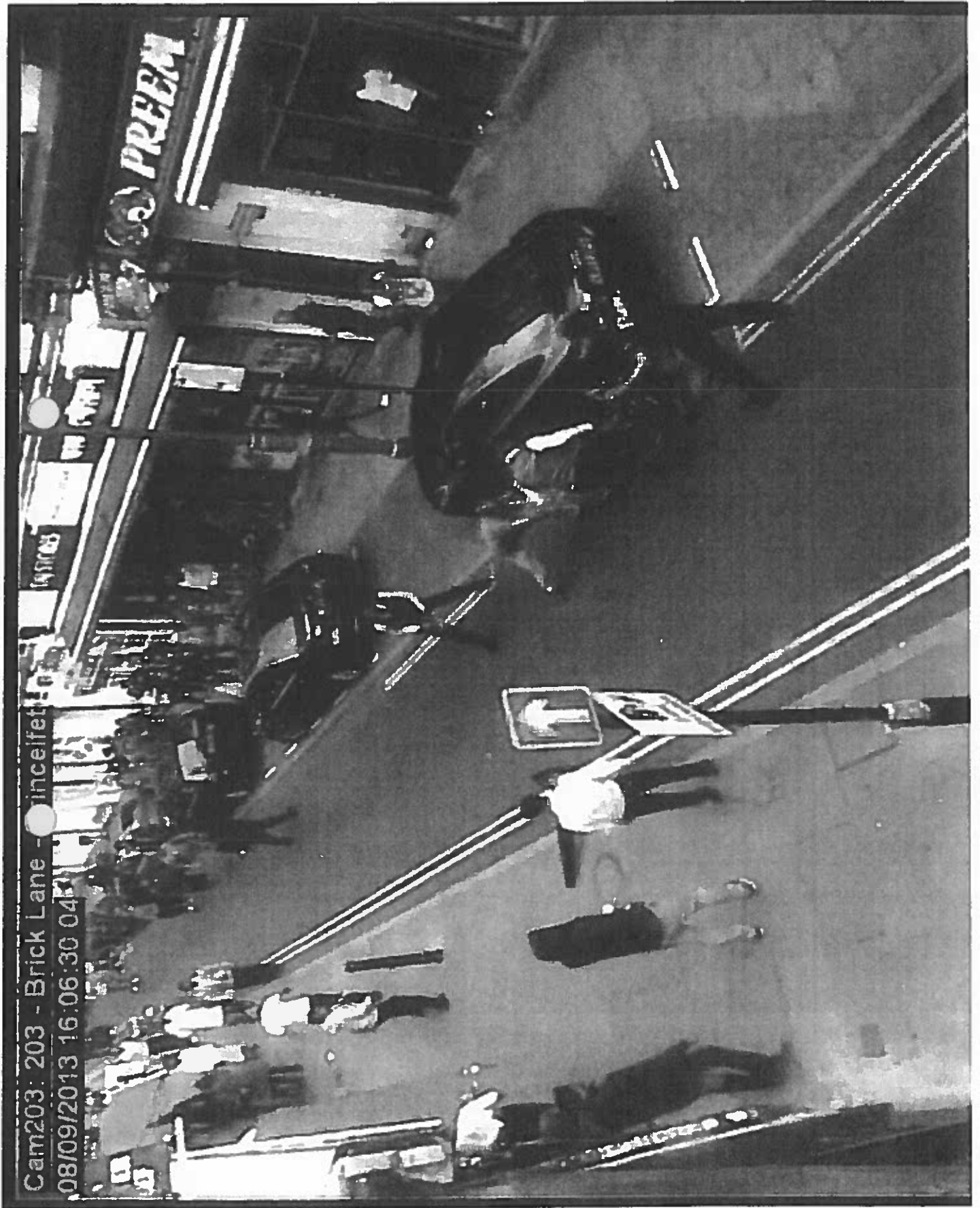
Annex 4



Amex 5



Anna 6



Annex 7

RESTRICTED (when complete)

MG 11 (T)

WITNESS STATEMENT

CJ Act 1967, s.9; MC Act 1980, ss.5A(3)(a) and 5B; Criminal Procedure Rules 2005, Rule 27.1

Statement of **Brendan Paul O'ROURKE**..... URN:

01	HT		14
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Age if under 18 **Over 18**..... (if over 18 insert 'over 18') Occupation: **Police Officer 230222**

This statement (consisting of: 4..... pages each signed by me) 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 anything in it which I know to be false, or do not believe to be true.

Signature: *B. O'Rourke*..... Date: **02/08/2014**.....

Tick if witness evidence is visually recorded (supply witness details on rear)

This statement is in relation to a breach of Premises Licence Conditions at City Spice, 138, BRICK LANE LONDON E1 6RU on 01/08/14

Officers original notes made at Brick Lane Police Station at 22:30 hours in my own company.

I am a police officer with the Licensing Unit of Tower Hamlets Borough Police.

On Friday, 1st August 2014, I was on duty in plain clothes when at approximately 19:00 hours, I gave a briefing to T/Sgt MSC 5020HT BARNA at Bethnal Green Police Station, regarding the Tower Hamlet Byelaw regarding 'touting', a brief overview of the Licensing Act 2003 in reference to Premises Licences and in particular to Section 19 Closure Notices under The Criminal Justice and Police Act 2001. I advised him that three restaurants in BRICK LANE had already been issued with Section 19 Closure Notices and we were concentrating on evidence with these three, however, any evidence in relation to any other restaurants would be welcome. There was also a formal slide on the Tower Hamlets briefing system in relation to this too. However as police resources are scarce and stretched over the weekend, particularly in the Whitechapel area, only a couple of officers were assigned to this matter undertaking a local initiative operation.

During the evening I was kept apprised of their progress and was advised that they had been 'touted' quite a few times. Around 22:00 hrs I met up with SC 5312HT RIDOUT and he gave me a verbal overview of the premises he had been touted at whilst with T/Sgt BARNA. We then attended various premises as and when SC RIDOUT saw the 'tout' who made the offer - I then I went into the premises

Signature: *B. O'Rourke*..... Signature witnessed by: **N/A**.....

2006/07(1): MG 11(T)

RESTRICTED (when complete)

Continuation of Statement of **Brendan Paul O'ROURKE**.....

with him and after he repeated the allegations, I then dealt with the matter.

At 22:15 hours I was in the company of SC RIDOUT, when I attended at City Spice Restaurant at 138, BRICK LANE, EI 6RU. PC 189HT CRUICKSHANK joined us at approximately 22:20 hours. I identified myself to staff as I entered as a police officer by producing my warrant card and saying "HELLO PC O'ROURKE FROM LICENSING CAN I SPEAK TO THE PREMISES LICENCE HOLDER OR MANAGER PLEASE".

A male came forward and as he did SC RIDOUT pointed out to me the male who had 'touted' him earlier. But the male ran into the kitchen, I followed but the male was not there, there was just kitchen staff or cooks in their kitchen clothing, no-one dressed as a waiter... I said to the staff "WHERE HAS THAT MAN GONE WHO JUST RAN IN HERE"?

A cook replied "WHAT MAN"?

I saw that there was a door in the corner and said "HAS HE RAN OUT OF THERE"?

The cook replied "NO IT'S LOCKED".

As I went over to try the door, the male who had come forward as manager, tried to stop me. I went over to the door and it was open and I exited onto WOODSEER STREET - the male had clearly 'ran off'. We all then went downstairs which was empty, so we could talk in quiet.

SC RIDOUT then said "AT 21:10, I WAS OFFERED A 25% DISCOUNT AND A FREE PINT BY THE BALD HEADED MALE WHO JUST RAN THROUGH THE KITCHEN".

I then said to the male who said he was manager "LET ME JUST TAKE YOUR DETAILS, WHAT'S YOUR NAME AND DATE OF BIRTH PLEASE"?

He replied "ABDUL AHAD, 11/11/1971".

I said "AND WHAT IS YOUR ADDRESS AND WHERE WAS YOU BORN PLEASE"?

He replied "19 ARNOLD ROAD, GRAVESEND DA12 5PU, BANGLADESH".

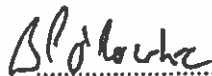
I said "AND HOW LONG HAVE YOU LIVED THERE"?

He replied "THIRTEEN YEARS".

I would describe him as an IC4 male, 5'07" tall, wearing a white shirt, black striped tie, black trousers and black shoes.

I then said to him "AND ARE YOU THE PREMISES LICENCE HOLDER"?

Signature:



Signature witnessed by:

N/A.....

2003(1)

PC 291115

Continuation of Statement of **Brendan Paul O'ROURKE**.....

He replied "DESIGNATED DPS".

He then said "IF WE DON'T HAVE PEOPLE OUTSIDE, WE DON'T SURVIVE".

I then checked the full premises licence and to see if Part B was on display, which it was.

I saw on the premises licence that the premises licence holder and designated premises supervisor was a Mr Mohammed Tonjob ALI, I said to Mr AHAD "I KNOW MR ALI'S NAME, ISN'T HE A PREMISES LICENCE HOLDER ELSEWHERE"?

He replied "HE MIGHT BE".

I said "ISN'T HE AT MUHIBS"?

He replied "YES".

I then said "WHAT IS THE NAME OF THE MAN WHO RAN OUT THE BACK DOOR"?

He replied "TOM SMITH".

PC CRUICKSHANK said "MR ABDUL YOU NEED TO TAKE THIS SERIOUSLY".

He replied "OK IT'S NOT, IT'S BALAR, HE'S ONLY BEEN HERE TWO DAYS, YOU CAN CROSS THAT OUT NOW".

I said "I HAVE WRITTEN DOWN WHAT YOU SAID".

I then completed Met Police form Book 694 'Notification of alleged offences' and a Section 19 Closure Notice under The Criminal Justice and Police Act 2001.

At 23:30 hours "I SHOULD POINT OUT IT IS AN OFFENCE UNDER THE LICENSING ACT 2003 TO COMMIT THE FOLLOWING OFFENCE UNDER SECTION 136 (1) CARRYING ON OR ATTEMPTING TO CARRY ON A LICENSABLE ACTIVITY ON OR FROM ANY PREMISES OTHERWISE AND IN ACCORDANCE WITH AN AUTHORISATION OR KNOWINGLY ALLOWING A LICENSABLE ACITIVITY TO BE CARRIED ON', IN PLAIN ENGLISH THAT MEANS ALLOWING MEMBERS OF STAFF TO TOUT". I then gave the 'now' caution and said "THE FACTS OF THE MATTER WILL BE REPORTED AND YOU MAY BE PROSECUTED", he made no reply.

The above offences are recorded on the form Book 694, of which I gave him a copy of and which he signed in receipt. I produce a copy in evidence as exhibit BOR/1 (copy attached). I then gave MR AHAD a copy of the Section 19 Closure Notice I had completed. Again he signed the document and I

Signature: *B.P. O'Rourke*Signature witnessed by: *PC JAIN*

N/A

Continuation of Statement of **Brendan Paul O'ROURKE**.....

produce a copy of this Notice in evidence as exhibit BOR/2 (copy attached). I then explained to him he need to speak with Mr ALL, the premises licence holder too. I then left the premises and we continued to the next venue.

B.P. O'Rourke
PC 291145

Notes completed 23:40 hrs.

Signature:

B.P. O'Rourke

Signature witnessed by:

N/A.....

WITNESS STATEMENT

COPY

CJ Act 1967, s.9; MC Act 1980, ss.5A(3)(a) and 5B; Criminal Procedure Rules 2005, Rule 27.1

Statement of James Ridout URN: 001 10 3 01034227 60

Age if under 18 Over 18 (if over 18 insert 'over 18') Occupation: Police Staff s524573

This statement (consisting of: 1..... pages each signed by me) 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 anything in it which I know to be false, or do not believe to be true.

Signature: [Signature] SC5312HT Date: 2/8/14

Tick if witness evidence is visually recorded [] (supply witness details on rear)

On Friday the 1st of August 2014, I was on duty in Plain cloths with HT5020. we had started shift at 19.45 hours at Limehouse police station were we had a briefing by HT5020 were we went through how we are trying to stop the touts from outside the Indian restaurants from Brick Lane E1.

At 20.40 hours Myself HT5312 RIDOUT and HT5020 BARNA made our way along Osborn Street then on to Brick Lane on foot. We were approached by a Male IC4 Black shirt, black trousers and black shoes form Saffron 53 Brick lane E1 6PU at 20.58 Hours when he offered us a starter, main, rice, poppadoms and a drink for £10 pounds each for four(4) people. The next one was Preem were we had two people from 124-126 and one from 118-122 E1 6RL. At 124-126 we were offered two beers and 25% off of all on the menu, this was offered at 21.08 hours. We then walked away, then came back and were offered two offers by the 118-122 were we were offered two beers, starter, main, rice and nan for £12pounds, this was made at 21.48 hours. This was made by an IC3 and an IC4 both male. We then moved on to the City Spice 138 Brick Lane E1 6RU. They offered one pint with 25% of all the menu at 21.10 hours.

All this information was then passed on to HT291 O'ROURKE we made our way back up Brick Lane at 23.10 hours were I pointed out the touts to him then he went on to deal with the licence holders.

I believe this all to be true and as accurate as possible to the true events.

Signature: [Signature] SC5312HT Signature witnessed by: [Signature] SPS BARNA 5020HT

Witness contact details

Home address:
..... Postcode:
Home telephone number Work telephone number
Mobile/pager number 07990077122 Email address:
Preferred means of contact:
Male / Female-(delete as applicable) Date and place of birth:
Former name: Ethnicity Code (16+1): Religion/belief:
Dates of witness non-availability

Witness care

- a) Is the witness willing and likely to attend court? No. If 'No', include reason(s) on MG6.
What can be done to ensure attendance?
- c) Does the witness require a Special Measures Assessment as a vulnerable or intimidated witness?
No. If 'Yes' submit MG2 with file.
- d) Does the witness have any specific care needs? No. If 'Yes' what are they? (Disability, healthcare, childcare, transport, , language difficulties, visually impaired, restricted mobility or other concerns?)

Witness Consent (for witness completion)

- a) The criminal justice process and Victim Personal Statement scheme (victims only) has been explained to me Yes No
- b) I have been given the Victim Personal Statement leaflet Yes No
- c) I have been given the leaflet 'Giving a witness statement to police — what happens next?' Yes No
- I consent to police having access to my medical record(s) in relation to this matter:
(obtained in accordance with local practice) Yes No N/A
- e) I consent to my medical record in relation to this matter being disclosed to the defence: Yes No N/A
- f) I consent to the statement being disclosed for the purposes of civil proceedings e.g. child care proceedings, CICA Yes No
- g) The information recorded above will be disclosed to the Witness Service so they can offer help and support, unless you ask them not to. Tick this box to decline their services:

Signature of witness: Print name:
Signature of parent/guardian/appropriate adult: Print name:
Address and telephone number if different from above:

Statement taken by (print name): MSC 5312 HT s524573 Ridout..... Station: Limehouse

Time and place statement taken:

Notification of alleged offences under the Licensing Act 2003

Venue Name: City Spice REF: (CAD/CRIS etc.)
Address: 138 Brick Lane London E1 6RU

Date: 1/12/14 Time: 2215

Details of person in charge at the relevant time: Mr Ahmad

DPS Personal Licence Holder

Summary of alleged offences identified ^{13346 TH PL}

- Section 57(4) Failure to secure premises licence or a certified copy at the premises or to prominently display a summary of the Licence.
- Section 57 (7) Failure to produce a premises licence or a certified copy.
- Section 109 (4) Failure to secure that a copy of the Temporary Event Notice (TEN) is prominently displayed at the premises or secure that a copy of the TEN is in the custody of an appropriate person.
- Section 109 (8) Failure to produce a TEN to a police officer.
- Section 135 (4) Failure to produce a personal licence to a police officer.
- Section 136 (1) Carrying on or attempting to carry on a licensable activity on or from any premises otherwise and in accordance with an authorisation or knowingly allowing a licensable activity to be carried on. (Sec19 issued Y No)
- Section 137 (1) Exposing alcohol for retail without an authorisation. (Sec19 issued Y No)
- Section 138 (1) Keeping alcohol on a premises for an unauthorised sale. (Sec19 Issued Y No)
- Section 140 (1) Knowingly allowing disorderly conduct on a licensed premises.
- Section 141 (1) Knowingly selling or attempting or allowing alcohol to be sold to a person who is drunk.
- Section 144 (1) Knowingly keeping or allowing non duty paid goods or unlawfully imported goods to be kept on premises.
- Section 145 (1) Allowing an unaccompanied child on a premises (used primarily or exclusively for the sale of alcohol).
- Section 146 (1) Selling alcohol to an individual aged under 18.
- Section 147 (1) Knowingly allowing the sale of alcohol to an individual under 18.
- Section 153 (1) knowingly allowing an individual under 18 to make a an unsupervised sale of alcohol.
- Section 179 (4) Intentionally obstructing any authorised person exercising a power of entry under section 179.

Details of alleged offence(s) including relevant Cad and Crime report details:
 Member of staff heard to talk for business in the street offering a 25% discount and a free beer contrary to Annex 2 of premises licence.

Issuing officer: Stolker Plaint Print: Stolker

I acknowledge receipt of this form: (venue) [Signature]

The purpose of this notice is to inform you that the failure to comply with the Licensing Act 2003 may result in the police initiating criminal proceedings against the DPS, premises licence holder, or both. This notice may also be used in evidence to support a review of the premises licence pursuant to section 51 Licensing Act 2003 and/or an application for a closure order under section 20 Criminal Justice and Police Act 2001

1950

Department of Health

Division of Health Services

Office of the Director

San Francisco, California

Dear Sir:

Reference is made to your letter of the 10th instant.

The information requested is being furnished to you.

Very truly yours,

Director

Enclosure

Very truly yours,

Director

Enclosure

Very truly yours,

Director

Enclosure

Very truly yours,

Director

Enclosure

CLOSURE NOTICE - SECTION 19 CRIMINAL JUSTICE AND POLICE ACT 2001

Date of the Closure Notice: 1/8/14 Time Served: 2330

Authority Issuing Notice: Metropolitan Police Service

Name and rank of person making the notice: PC JAHN O'Rourke

Signature: [Handwritten Signature]

Name (if applicable) and address of the affected premises:
138 Brick Lane London E1 6RY

Alleged unauthorised use of the premises (section 19 (6)(a))

The officer serving this notice is satisfied that the above premises are being, or within the last 24 hours have been, used for the unauthorised sale of alcohol for consumption on, or in the vicinity of the premises. The specific details of the alleged use are:

Member of staff heard to talk and offer a 25% discount and free beer in the street

Grounds upon which the person serving the Notice was satisfied of the existence of such unauthorised use:

Contrary to Annex 2 of Premises Licence

Steps that may be taken to end the alleged unauthorised use of the premises, or to prevent it from re-occurring (section 19 (6) (c))

Comply with conditions of Annex 2 - not to talk to business.

Third party consideration (section 19.4)

Are there any other persons occupying the premises who need to be informed of this notice?

Yes/No (details)

If yes they must be issued with a copy of this form

Effect of section 20, Application for closure order.

A failure to take remedial action to prevent further or continued unauthorised use may lead to an application being made to a Magistrates court for a closure order under section 21 Criminal Justice and Police Act 2001.

The Person (if applicable) on whom the closure notice has been served:

Name: M Abdul AWAD

Signature: [Handwritten Signature]

Date: 1/8/14

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1. EXPLANATORY NOTES

A police officer has decided to issue this closure notice under the terms of section 19 of the Criminal Justice and Police Act 2001 ("the 2001 Act"). The notice alleges that the said premise has been operating either without premises licence, or otherwise than in accordance with a premises licence. It also details the actions that may be taken by the owner or manager to end the unlicensed sale of alcohol to prevent it reoccurring. Please note that any such unauthorised activity may also constitute a criminal offence under section 136 Licensing Act 2003.

The purpose of this notice is to provide a warning to those responsible for the premises in order that swift remedial action can take place to rectify the unauthorised activity. If the problem continues, or appears likely to continue, the police may apply to the magistrate's court for an order to close the premises.

2. Section 19 of the 2001 Act- Closure Notices

Where a police officer, or an authorised officer from the local authority, is satisfied that any premises are being, or within the last 24 hours have been used for the unauthorised sale of alcohol, for consumption on, or in the vicinity of the premises, he may serve a notice under section 19(3) in respect of the premises. An "unauthorised sale of alcohol" includes a premises with a valid premises licence, but that is operating in breach of its licence conditions. Any person occupying another part of any building or other structure of which the premises forms part whom may have their access adversely affected by the application to the magistrate for a section 20, resulting in a possible issuing of a full closure (Sec 21) by the court must also be issued with a copy of this form.

3. Section 20 of the 2001 Act- Closure Orders

Your attention is drawn to section 20 of the 2001 Act. This provides that the police, or as the case may be the local authority, can take action against the said premises by applying to a justice of the peace at the local magistrates' court for a closure order if the unlicensed sale of alcohol (as alleged in this closure notice) is continuing, or there is a reasonable likelihood that the premises will be so used in the future.

The application for a closure order must be made not less than 7 days, and not more than 6 months, after the date on which this closure notice was served.

After an application for a closure order is made, the justice of the peace may issue a summons requiring the applicant, and also the person or persons on whom the closure notice was served, to attend a court hearing. At the hearing the court will consider the applicant's complaint against the said premises and decide whether a closure order should or should not be made.

In accordance with the Magistrates' Courts Act 1980 and the Human Rights Act 1998 you are entitled to be legally represented at the hearing and to make representations to the court before any decision is taken.

4. Appeals- Section 24 of the 2001 Act

An appeal against a decision by the magistrates' court to grant a closure order, or a decision to refuse an application for a closure order, can be made by an affected person to the Crown Court within 21 days.

5. Enforcement Powers and Offences- Section 25 of the 2001 Act

It is an offence for a person, without reasonable excuse, to permit a premises to be open in contravention of a closure order made by the magistrates court. Any person found guilty of such an offence will be liable to a fine not exceeding £20,000, or to imprisonment for a term not exceeding three months, or to both.

It is also an offence for a person who, without reasonable excuse, fails to comply with any other terms of a closure order made by the court, or does an act which contravenes those other terms. Any person convicted of this offence is liable to a fine not exceeding £5,000, or to three months imprisonment, or to both.

Police officers and authorised officers from the local authority have the power to enter the said premises at "any reasonable time", and do anything reasonably necessary to secure compliance with the closure order (for example, to board up the premises). However, when exercising this power, the constable or the officer must produce evidence of this authority to enter and also his identity before entering the premises, if asked to do so by the owner (or the occupier or the person in charge of the premises).

It is an offence for a person to intentionally obstruct police officers or authorised local authority officers from exercising these powers. Any person convicted of obstructing a police officer is liable to a fine not exceeding £5,000, or to one month's imprisonment, or to both.

Any person convicted of obstructing an authorised local authority officer is liable to a fine not exceeding £5,000.

Annex 10



KC Solicitors

2nd Floor, 291 Whitechapel Road
London E1 1BY

Tel : 020 7375 3761

Fax : 020 7377 1113

info@kcsolicitors.co.uk

www.kcsolicitors.co.uk

Our Ref: L.M/A.H/KC
Your Ref: TSS/LIC/73686

01/10/2014

LBTH Licensing Authority
Mulberry Place
5 Clove Crescent
London
E14 2BG

Dear Sirs

Re: Review Application - Preem, Ground Floor and Basement, 118 - 122 Brick Lane, London E1 6RL

We write to confirm that we have been instructed to deal this above licensing matter. We would be grateful if you kindly forward all the future correspondences to our letter head address. We acknowledged that our client's license would be formally reviewed 07/10/2014 at the LBTH Mulberry Place. Please note that we will formally represent our client on the day and we would be obliged if you kindly assist our representative to deal this matter accordingly.

We hereby enclosed the following documents:

1. Mr Hussian's statement;
2. 4 x notices those were served by our client through by his counsel;
3. 3 x correspondences letters between my client and his counsel;

We would be grateful if you kindly consider the enclosed documents as well as written and oral evidences to review our client's license.

Should you require any more information please do not hesitate to contact us.

Yours faithfully


KC Solicitors

Principal
Mohammed Abul Kalam Chowdhury

ASSOCIATE SOLICITORS
Abu Elias
Mohammed Rakibur Rahman

Your Ref: TSS/LIC/73686

01/10/2014

The Chairman
Licensing committee
LBTH Licensing Authority
Mulberry Place
5 Clove Crescent
London
E14 2BG


Dear Sirs

Re: Review Application – Preem, Ground Floor and Basement, 118 – 122 Brick Lane, London E1 6RL

I write to confirm that I am the manger and DPS License holder of Preem Restaurant. The matter has been listed before the licensng sub committee to review my license. I personally believe that I became a victim and the matter has been deliberately listed since I already received conviction for the same offence where I have pleaded guilty. I believe that the committee should consider my following grounds to determine the review application:

1. I have already pleaded guilty and fined. Therefore, it would be unfair and unreasonable to review this matter again.
2. A group of people including the some brick lane restaurant owner are always against me. They have been campaigning against me and have been trying to put me in trouble.
3. I have already served official notices to the local businessmen those deliberately employ the touts and to do touting in my doorstep. After serving the notices I got numerous threats from the alleged group of individuals.
4. During September 2014 the licensing officers were attacked by the local restaurant touts and they took shelter in my premises. However, before leaving the premises they accused me for no justifiable reasons.
5. I would like to mention that there is a rumour around brick lane and in particular Bengali community that a group of people working tirelessly to remove me from brick lane. This group are well organised and they took instruction from the very high level of LBTH officials. As I always speak for the truth and against any sort of injustice. This group also aiding or facilitating another particular group to make the brick lane "a Non Alcoholic Zone".
6. Finally I would like to confirm that despite my numerous efforts to comply with all the conditions attached to my license but this particular group always put me in trouble and always behind me. Therefore, I am requesting a fair justice from the licensing committee.

Yours faithfully,


AZIZUL HOSSAIN
118 Brick Lane
London
E1 6RL

[REDACTED]
The Licencee,
Muhib Restaurant,
73 Brick Lane,
LONDON E1 6QL

Dear Sir,

**NOTICE BEFORE ACTION
OPEN OFFER TO AGREE TO UNDERTAKINGS**

Re: Harrasment of Azmal Mert Hussain, his employees, agents and customers:

Introduction

I am a barrister instructed by Mr Azmal Hussain and Hussaine UK Limited, on a direct access basis, in relation to an impending claim of harassment against you, your employees and agents. Mr Hussain is the licensee of four restaurants on Brick Lane, London E1: Preem 1, Preem 2, Preem 3, Preem 4 (together 'the Preem Restaurants'), located between 108 and 126 Brick Lane. The restaurants are owned by Hussaine UK Limited, which company also holds the leasehold of all the premises at which the Preem Restaurants are located. The allegations set out below are the allegations of Mr Hussain.

Since Wednesday, 12.6.2014, Mr Hussain and the staff and customers of the Preem Restaurants have been the subject of harassment by staff employed by six other restaurants in Brick Lane: Curry Bazaar (77 Brick Lane); Bengal Village (75 Brick Lane), Mohaib Restaurant (73 Brick Lane), Café Bangla (128 Brick Lane), Aladeen (132 Brick Lane) and Nazrul (130 Brick Lane). These restaurants are located as follows. On the opposite side of the road to the Preem Restaurants are Curry Bazaar, Bengal Village and Mohaib Restaurant. On the same side of Brick Lane as the Preem Restaurants are Café Bangla, Aladeen and Nazrul.

Factual Background

The facts of the matter, as alleged by Mr Hussain, are these.

You are currently charged with assaulting a member of Mr Hussain's staff. Mr Hussain alleges that you are guilty of that offence and that that offence is a part of the course of conduct, constituting harassment, against him, his staff and his customers.

On Monday, 10.6.2014, Mr Hussain hosted, at the Preem Restaurants, a press conference at which it was announced that an Election Petition had been presented challenging the election of Mr Lutfur Rahman as Mayor of Tower Hamlets.

At 3 am the next day, Mr Hussain discovered his van, that was parked in the back yard of the Preem Restaurants, was covered with white paint over both windscreens and on the side windows, making the car un-drivable. He washed his car to the extent that it was just

drivable and drove home, fearing for his personal safety if he did not.

At 1 pm the following afternoon, 11.6.2014, Mr Hussain went into his restaurant at 122 Brick Lane and discovered that the side window had been smashed. This had been discovered by his staff. He called the police, who later attended and investigated the incident.

That same day, in the evening, touts that promote each of the above restaurants went in front of the door to one of the Preem Restaurants. There were over ten of them. They all went up to people who were thinking about coming into the restaurants and said to them that the Preem Restaurant outside which they were standing was a bad restaurant. They also threatened Mr Hussain's staff by saying that they should not work for me as I was against Bengali culture and the Muslim culture. All of this was said in Bengali.

At this point it should be noted that touting for business in Brick Lane is illegal, pursuant to a bylaw of the London Borough of Tower Hamlets ('the Borough') of 2005. However, each of the above restaurants engages in touting on a daily basis. It is also admitted that the Preem Restaurants has engaged in touting, although Hussaine UK Limited and Mr Hussain are prepared to undertake not to do so in exchange for cross undertakings, as set out below.

The touts outside the Preem Restaurants, on 11.6.2014, targeted individual customers and stayed outside them for as long as the customer was there, attempting to entice them away to the restaurant for whom they worked. Before this point, although there are a large number of touts on Brick Lane, they would not do any more than promote their own restaurants and tell customers about deals. There was also an informal rule – which all the touts respected – that they would never cross the road. On this occasion and subsequently, touts from all the restaurants would break this agreement and target customers of the Preem Restaurants, wherever they came from.

From the first three restaurants named above, Curry Bazaar, Bengal Village and Mohaib, the owners as well as the touts were coming over to my side of the road, enticing customers away and threatening members of my staff and me. It is alleged that you, Mr Ahab, were one of those. From each of the above three, touts have stood directly on the pavement of the same side of Brick Lane as the Preem Restaurants, enticing customers away, saying that the restaurants are of bad quality and stating that their restaurants have better deals.

Over the period of almost two months since 12th June, 2014, the behaviour of the touts and owners of the above restaurants, including your own, outside the Preem Restaurants has continued to cause Mr Hussain's staff and customers harassment alarm and distress and has damaged his businesses. Through the whole of the peak period of business – ie 7 pm to 11 pm – every day, seven days a week there are a number of touts from one or more of these restaurants outside his restaurants who are, he asserts, deliberately damaging his businesses.

Mr Hussain is aware that the touts come from all of the above restaurants as he has heard each of the names of those competitors said by the touts on many occasions. For example, he has heard touts say or shout 'this is a bad business, come to Aladeen and I will give you a good deal'. Every day since 12th June he has heard touts mention the names of each of the above restaurants while putting down his businesses. This has been heard both when Mr Hussain and others were standing or sitting inside one of the Preem Restaurants and when he was in his office, from where he can hear what is said through his CCTV.

- (1) That you, your employees or agents, will not, directly or indirectly, cause Mr Hussain and/or the employees and/or customers of any of the Preem Restaurants harassment, alarm or distress; and that, in particular, you will not threaten or abuse any of the aforesaid;
- (2) That you, your employees or agents, will not in any way damage the reputation of Preem Restaurants, including by attempting to persuade any persons and, in particular, those on Brick Lane E1 for any reason whatsoever, not to visit any one of the Preem Restaurants or by making any representations whatsoever about any one of the Preem Restaurants;
- (3) That you, your employees or agents, will not tout for business, in contravention of the local by-law or at all, in any part of Brick Lane;

Mr Hussain is prepared to give cross-undertakings that he and/or his employees and agents will not do any of the aforesaid towards you and/or your restaurants.

In addition, Mr Hussain requests and requires that you agree to his issuing an application for an injunction, pursuant to the 1997 Act, in the Bow County Court on the strict understanding that you and he will agree to the above undertakings.

This offer is made without prejudice to Mr Hussain's contention that you are liable to him for substantial damages for the loss of profits caused and/or contributed by the aforesaid actions of yourself and your staff.

Legal Action

If you do not inform Mr Hussain, by post to Mr Hussain, Preem 1, 108 Brick Lane, London E1 [POST CODE] or by fax to [FAX NUMBER], that you do not agree to make the above undertakings and to the above course of action by 4 pm on Monday, 11th June, 2014, Mr Hussain will make a claim for an injunction and for damages in the Bow County Court or the Queen's Bench Division of the High Court at his discretion. This will involve substantial costs, for which you will be liable in the event the claim is successful.

You are strongly advised to seek independent legal advice.

Please do not respond to this letter directly but indicate whether or not you agree to the aforesaid injunctions by contacting Mr Hussain at the above address or fax number.

Yours Sincerely,

FRANCIS HOAR

Counsel (direct public access) to Mr Hussain and Hussain (UK) Limited

Annex 11

RESTRICTED (when complete)

MG 11(T)

WITNESS STATEMENT

CI Act 1967, s.9; MC Act 1980, ss.5A(3)(a) and 5B; Criminal Procedure Rules 2005, Rule 27.1

Statement of PC Ishpal-Jamie Pandhal 700HT..... URN:
Age if under 18 Over 18..... (if over 18 insert 'over 18') Occupation: Police Officer 235140

This statement (consisting of: 1..... pages each signed by me) 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 anything in it which I know to be false, or do not believe to be true.

Signature: I. J. PANOHAL 700HT..... Date: 14/12/2014.....

Tick if witness evidence is visually recorded [] (supply witness details on rear)

I am the named person above this statement is in relation to an incident where I seized several exhibits following an incident of grievous bodily harm on Saturday the 13th of December 2014.

I am a serving full time police officer in the Metropolitan Police Service since 16th May 2013. I am attached to response team 2 based out of Limehouse police station. My duties involve me responding to emergency and non emergency calls made to the police within the London Borough of Tower Hamlets.

On Saturday the 13h of December 2014, I was on patrol in my full uniform I was in the company of PC MATTHEWS 547HT we were in a marked police vehicle call sign HT26-N. Whilst conducting our patrols we had been sent to CAD 10143/13DEC14 this was to a report of an assault outside of Muhib, 73 Brick Lane E1 6QL.

Whilst dealing with the incident I seized the following exhibits.

IJP/01- One (1) T-shirt sealed in bag no MPSH00119856 booked in front office HT 66/5586 105/6712. This was taken from the victim of the assault.

IJP/02-One (1) CCTV box sealed in bag no MPSS00488083 booked in front office HT 66/5586 105/6713 This had been seized from Muhib - 73 BRICK LANE E1 6QL.

Signature: I. J. PANOHAL 700HT..... Signature witnessed by:

2006/07(1): MG 11(T)

RESTRICTED (when complete)

WITNESS STATEMENT

CJ Act 1967, s.9; MC Act 1980, ss.5A(3)(a) and 5B; Criminal Procedure Rules 2005, Rule 27.1

Statement of Brendan Paul O'ROURKE..... URN: 01 HT 14

Age if under 18 Over 18..... (if over 18 insert 'over 18') Occupation: Police Officer 230222

This statement (consisting of: 2..... pages each signed by me) 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 anything in it which I know to be false, or do not believe to be true.

Signature: [Handwritten Signature] PC 2011 AS Date: 16/02/2015.....

Tick if witness evidence is visually recorded [] (supply witness details on rear)

This statement is in relation to CCTV from an incident at MUHIB, 73 BRICK LANE E1 on 13/12/14

I am a police officer with the Licensing Unit of Tower Hamlets Borough Police.

Between Thursday, 12th February 2015 and Friday, 13th February 2015, I attended at the Digital and Electronics Forensic Service (DEFS) video laboratory at 'Newlands Park', where I viewed the CCTV footage from exhibit IJP/02 (a Digital Video Recorder X Vision machine x 8 DVR v.131).

A time check of the machine showed that it was ahead of real time by 1 minute and 14 seconds. It contained 8 channels, but only appeared to have six working cameras as follows:

- Ch 1 - covers the entrance from outside and part of the pavement on Brick Lane.
Ch 2 & Ch 3 - covers inside.
Ch 4 - is blank.
Ch 5 - Partially covers the bar.
Ch 6 - covers inside.
Ch 7 - appears to be a storeroom.
Ch 8 - is blank.

On Friday 13/02/15 I made a self-copy DVD of the footage from 13/12/14 20:43:00 hrs to the video end at 00:25:04 hrs - I produce it in evidence as exhibit BOR/1, it was sealed in evidence bag A18491924. I also produced two working copies of the footage on two memory sticks, which are

Signature: [Handwritten Signature] PC 2011 AS Signature witnessed by: N/A

Continuation of Statement of **Brendan Paul O'ROURKE**.....

produced as exhibits BOR/2 and BOR/3.

Exhibit IJP/02, which was sealed in an evidence bag, with a plastic tag seal MPSS00488083, was resealed with tag MPSS01451699 and later re-deposited at the Bethnal Green Police Station's property store.

A short summary of what I viewed is as follows:

20:43:40 - (Ch 1) A tout is seen to bring a group of males towards the door.

20:44:05 - (Ch 3) The group of 4 males are seated underneath camera 3 (Ch 3) with a table for 4 left empty adjoining them.

21:28:10 - (Ch 3) The second party of 4 males is seated next to the above. The tables are now pushed together and they are clearly friends, shaking hands and chatting to each other.

22:58:38 - (Ch 3) - Waiter appears to take a plate, with the payment on it off the table.

Invariably they eat and drink, without any incident all the way through until 22:59:35, when something happens off camera; two females (seen on Ch 2) start to stare at something in front of them and 'our' group of males also look in the same direction (seen on Ch 3).

23:00:30 - Whatever has happened off camera, now kicks off and a mass brawl spills into Ch 6, Ch 2 and Ch3.

The victims then leave and are seen to loiter outside the front door (Ch 1) - one clearly holding his head in pain; the staff are seen to scurry into the basement (Ch 7) and by 23:05 the lights are turned out and the restaurant appears to have closed!

00:00:40 - Police are seen to enter and the lights are turned on, whilst police search the premises.



Signature:



Signature witnessed by:

N/A.....

Licensing Section
London Borough of Tower Hamlets
Mulberry Place,
5 Clove Crescent,
E14 2BG

Our Ref: dd/aa/

19th February 2015

Dear Sirs,

Re: Application for a Review – Muhib, 73 Brick Lane, E1 6QL

We write with reference to the above and confirm that we are instructed to act on behalf of the Premise Licence Holder.

Our client has brought to our attention a copy of the Public Notice, advertising the review, which we understand was on display at the Premises until recently.

On scrutinising the Public Notice, it displays the closing date for representations to be received as being the 12th February 2014. It is clearly wrong as it should have displayed the year as 2015.

Your letter dated 30th January 2015 from Mr Mohshin Ali to the Premises Licence Holder appears to have a photographic representation of the notice clearly showing the wrong date. In addition, the notice on your web site also shows 12th February 2014.

Therefore, on considering this Public Notice and the Licensing Act 2003 (Premises Licences) Regulations 2005, Regulation 38 & 39, in relation to Advertisements of Review by a Licensing Authority, we note that the Public Notice shall state the dates between which interested parties and responsible authorities may make representations to the relevant licensing authority.

Therefore, the public notice has not been written in accordance with statutory procedure requirements which are mandatory for the application to be valid from the start.

As you will be aware the local authority has no discretion to vary statutory procedures which are mandatory and on that basis any hearing that proceeds on the basis of a defective application process, i.e. an incorrectly advertised Public Notice, will be void ab initio.¹

¹TAYLOR v MANCHESTER CITY COUNCIL, TCG BARS LIMITED [2012] EWHC 3467 (ADMIN)

Dadds Solicitors

Crescent House, 51 High Street, Billericay, Essex CM12 9AX
T: 01277 631811 F: 01277 631055 E: office@dadds.co.uk
W: www.dadds.co.uk DX: 32202 BILLERICAY



We would respectfully suggest that the application is re-made with the Public Notices being displayed correctly in the terms as set out in Regulations 38 & 39.

It may be that we have misunderstood the law and if you believe there is legal authority for the application having been valid even though the Notice requirements have not been complied with, we would be more than happy to reconsider our view.

We apologise for not bringing this matter to your attention before today but we have only just been instructed in relation to the Public Notice.

We look forward to hearing from you in this matter.

Yours Faithfully



DADDS LLP

TRAD
7-5

PC 291HT O'Rourke
Police Licensing Department,
Limehouse Police Station,
27 West India Dock Road,
London,
E14 8EZ

Our Ref: dd/aa/

Your Ref:

19th February 2015

Dear Sir,

Re: Application for a Review – Muhib, 73 Brck Lane, E1 6OL

We confirm we are acting on behalf of the Premises Licence Holder in connection with the review at the above premises.

Therefore, in connection with the review, we would require you to provide the following information:-

1. In the review, the police refer to CAD 10143 of the 13th December 2014 together with CRIS 4232205/14. Please supply us with copies of those documents;
2. In addition, the police refer to "53 hits for 'Muhib' or 'Brick Lane'..." and a further CAD (6201 of the 8th September 2013) and a CRIS report 4223750/13. It is unclear just exactly what '53 hits' means, however if the police seek to rely upon this information; we require sight of it forthwith. Once again, please supply us with copies of those '53 hits' and the CRIS document;
3. There is also reference to an arrest on the 13th November 2013 in A & Y Wines. Please supply any documentation in respect of this incident;
4. Further, the police state that a person was injured and CCTV footage was recorded and referred to as exhibit BK/01. Please supply a copy of the CCTV footage together with a copy of the statement of 'BK' who produces the exhibit;
5. With reference to the CCTV, the police state, "...how someone did not die...is beyond me..." Please ensure an updated CRIS concerning this person's severe injuries is also provided.

For the avoidance of doubt we do not require the individual names or require the identity of any complainant, or any details which may identify the complainant or their address. However we do require all the correspondence and would expect the Metropolitan Police to edit the same accordingly.

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In providing this information, we are happy that you redact anything that could potentially lead to the identification of any third parties.

We look forward to hearing from you in this matter.

Yours Faithfully

A handwritten signature in cursive script that reads "Dadds".

DADDS LLP

Cc: Licensing Section, Mulberry Place, 5 Clove Crescent, E14 2BG

Licensing Section
London Borough of Tower Hamlets
Mulberry Place,
5 Clove Crescent,
E14 2BG

Our Ref: dd/aa/

19th February 2015

Dear Sirs,

Re: Application for a Review – Muhib, 73 Brick Lane, E1 6QL

We confirm we are acting on behalf of the Premises Licence Holder in connection with the review, called for by the police, at the above premises.

We are instructed that our client recently applied to transfer the licence and it is our understanding there has been no objection to this transfer.

As such, we ask that you forward the Premises Licence with the updated details to us as soon as possible.

We look forward to hearing from you in this matter.

Yours Faithfully



DADDS LLP



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Crescent House, 51 High Street, Billericay, Essex CM12 9AX
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Licensing Section
London Borough of Tower Hamlets
Mulberry Place,
5 Clove Crescent,
E14 2BG

Our Ref: dd/aa/

19th February 2015

By email: mohshin.ali@towerhamlets.gov.uk

Dear Sirs,

Re: Application for a Review – Muhib, 73 Brick Lane, E1 6QL

We confirm we are acting on behalf of the Premises Licence Holder in connection with the review, called for by the police, at the above premises. In respect of this, please find enclosed a copy of a letter sent today to the police licensing officer.

In addition, we have been instructed to make a request under Freedom of Information legislation in relation to the above premises and, as such, we would require the following information:-

1. Any written communication with the Licensing Section in relation to the aforementioned premises, by any person, and in connection with any licence application, or allegation of public nuisance, or trading standards enforcement matter, or test purchasing, whether successful or not, within the last 6 months.
2. Please confirm how many, if any, complaints there has been in relation to the above aforementioned premises in the last 6 months.
3. Please confirm how many individuals have complained about the aforementioned premises in the last 6 months.

For the avoidance of doubt we do not require the individual names or require the identity of any complainant, or any details which may identify the complainant or their address. However we do require all the correspondence and would expect Tower Hamlets Council to edit the same accordingly.

We look forward to hearing from you in this matter.

Yours Faithfully



DADDS LLP

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Continuation of Statement of **Brendan Paul O'ROURKE**.....

produced as exhibits BOR/2 and BOR/3.

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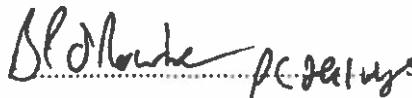
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00:00:40 - Police are seen to enter and the lights are turned on, whilst police search the premises.



Signature:



Signature witnessed by:

N/A.....

Licensing Section
London Borough of Tower Hamlets
Mulberry Place,
5 Clove Crescent,
E14 2BG

Our Ref: dd/aa/

19th February 2015

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We look forward to hearing from you in this matter.

Yours Faithfully



DADDS LLP

PC 291HT O'Rourke
Police Licensing Department,
Limehouse Police Station,
27 West India Dock Road,
London,
E14 8EZ

Our Ref: dd/aa/

Your Ref:

19th February 2015

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Therefore, in connection with the review, we would require you to provide the following information:-

1. In the review, the police refer to CAD 10143 of the 13th December 2014 together with CRIS 4232205/14. Please supply us with copies of those documents;
2. In addition, the police refer to "53 hits for 'Muhib' or 'Brick Lane'..." and a further CAD (6201 of the 8th September 2013) and a CRIS report 4223750/13. It is unclear just exactly what '53 hits' means, however if the police seek to rely upon this information; we require sight of it forthwith. Once again, please supply us with copies of those '53 hits' and the CRIS document;
3. There is also reference to an arrest on the 13th November 2013 in A & Y Wines. Please supply any documentation in respect of this incident;
4. Further, the police state that a person was injured and CCTV footage was recorded and referred to as exhibit BK/01. Please supply a copy of the CCTV footage together with a copy of the statement of 'BK' who produces the exhibit;
5. With reference to the CCTV, the police state, "...how someone did not die...is beyond me..." Please ensure an updated CRIS concerning this person's severe injuries is also provided.

For the avoidance of doubt we do not require the individual names or require the identity of any complainant, or any details which may identify the complainant or their address. However we do require all the correspondence and would expect the Metropolitan Police to edit the same accordingly.

Dadds Solicitors

Crescent House, 51 High Street, Billericay, Essex CM12 9AX
T: 01277 631811 F: 01277 631055 E: office@dadds.co.uk
W: www.dadds.co.uk DX: 32202 BILLERICAY



In providing this information, we are happy that you redact anything that could potentially lead to the identification of any third parties.

We look forward to hearing from you in this matter.

Yours Faithfully

A handwritten signature in cursive script that reads "Dadds".

DADDS LLP

Cc: Licensing Section, Mulberry Place, 5 Clove Crescent, E14 2BG

Licensing Section
London Borough of Tower Hamlets
Mulberry Place,
5 Clove Crescent,
E14 2BG

Our Ref: dd/aa/

19th February 2015

Dear Sirs,

Re: Application for a Review – Muhib, 73 Brick Lane, E1 6QL

We confirm we are acting on behalf of the Premises Licence Holder in connection with the review, called for by the police, at the above premises.

We are instructed that our client recently applied to transfer the licence and it is our understanding there has been no objection to this transfer.

As such, we ask that you forward the Premises Licence with the updated details to us as soon as possible.

We look forward to hearing from you in this matter.

Yours Faithfully



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L10 82452

Licensing Section
London Borough of Tower Hamlets
Mulberry Place,
5 Clove Crescent,
E14 2BG

Our Ref: dd/aa/

19th February 2015

By email: mohshin.ali@towerhamlets.gov.uk

Dear Sirs,

Re: Application for a Review – Muhib, 73 Brick Lane, E1 6QL

We confirm we are acting on behalf of the Premises Licence Holder in connection with the review, called for by the police, at the above premises. In respect of this, please find enclosed a copy of a letter sent today to the police licensing officer.

In addition, we have been instructed to make a request under Freedom of Information legislation in relation to the above premises and, as such, we would require the following information:-

1. Any written communication with the Licensing Section in relation to the aforementioned premises, by any person, and in connection with any licence application, or allegation of public nuisance, or trading standards enforcement matter, or test purchasing, whether successful or not, within the last 6 months.
2. Please confirm how many, if any, complaints there has been in relation to the above aforementioned premises in the last 6 months.
3. Please confirm how many individuals have complained about the aforementioned premises in the last 6 months.

For the avoidance of doubt we do not require the individual names or require the identity of any complainant, or any details which may identify the complainant or their address. However we do require all the correspondence and would expect Tower Hamlets Council to edit the same accordingly.

We look forward to hearing from you in this matter.

Yours Faithfully

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