

1st Statement of Manpal Clair

Made on behalf of SEV Licence Holder

Dated: 8 May 2023

Before Tower Hamlets Council's Licensing Committee

Sch. 3 of the Local Government (Miscellaneous Provisions) Act 1982 (as amended)

**Tower Hamlets Council (as a Licensing
Authority)**

Applicant

and

NH License Ltd

SEV Licence Holder

**Witness Statement of Manpal Clair
(Director NH License Ltd)**

1. My name is Manpal Clair. I am 40 years old. I live at [REDACTED], [REDACTED]. I am of previous good character and have no previous criminal convictions or cautions (save for a driving matter). I am married with two children under the age of 4.
2. I am the sole director of NH License Ltd ("the Licence Holder") at The Nags Head, 17-19 Whitechapel Road, London E1 1DN ("the Premises").
3. I make this witness statement in relation to the application to revoke the Sexual Entertainment Venue Licence ("SEV") for the Premises.
4. To assist the Licensing Committee I have prepared a timeline of events, which I exhibit as **MC1**.

Background

5. My family have run licensed premises since the 1970s and I have grown up in and around them and the wider hospitality industry all my life. This includes pubs, bars, nightclubs, and sexual entertainment venues or stripclubs ("**SEVs**").

6. The flat where my parents lived when I was a child was above my father's nightclub in Forest Gate.
7. I have always worked in the hospitality industry. It is my career and I have never done anything else. You could say that my role was always to take over the hospitality businesses built by my father and my uncle.
8. I started working in my family's venues at around 12 years old. I would help with cleaning and stocking the cellars. I started working behind the bars of our venues aged 18 and have progressed from there to managing the entire group of companies.
9. I hold a Personal Licence to sell alcohol and have done so since 2005.
10. My group of companies currently operates two venues:
 - a. The Premises; and
 - b. The Nellie Dean (a public house) in Westminster.
11. The group of companies also previously operated:
 - a. The Crown (a public house) in the City of London; and
 - b. The Hope (a public house) in Camden.
12. Both The Crown and The Hope were leased from a pub company and were handed back to the company when the leases expired during Covid.

HISTORY OF THE PREMISES

13. My father first acquired the Premises in the 1970s. At the time I think it was operating as a public house and he turned the Premises into a strip pub/club.
14. My father ran the venue successfully and with minimal issues from the late 1970s until he began winding down towards his retirement around 2003.
15. In the run up to my father's retirement, I began to take on a more prominent role in the business. In 2020 the SEV Licence was transferred to the SEV Licence Holder. This was part of a wider restructuring of our business interests. For example, the Premises Licence for The Nellie Dean Public House was transferred to Nellie Dean License Ltd.
16. I was running the Premises when the Council determined to introduce the Local Government (Miscellaneous Provisions) Act 1982 regime for Sex Establishments in Tower Hamlets.

17. The Premises, along with several others, were highly involved in that process including the drafting of Tower Hamlets SEV conditions.
18. The Premises runs largely without incident. I exhibit as **MC2** an email from PC Mark Perry detailing the dealings that the Premises have had with the Police and the lack of issues.
19. The Premises is a small SEV where entertainment takes place on the ground floor only. I exhibit as **MC31** a plan of the Premises. The basement of the Premises is our cellar and storage area. The first floor of the Premises is where our offices are located, as well as a secondary changing room.
20. Access to the Premises is via Whitechapel Road. From the pavement one enters a small atrium area. The atrium is manned by one of our SIA Door Supervisors who is stationed there when the Premises is open.
21. The SIA Door Supervisor in the atrium will vet the person seeking entrance to the Premises and make sure that their attention is drawn to:
 - a. The Customer House Rules;
 - b. Our age verification policy; and
 - c. Our price tariff.
22. All of these are displayed on the wall inside the atrium. An enlarged copy of the Customer House Rules is displayed on the back of the door that provides entrance into the venue.
23. In addition to displaying the rules at the entrance to the Premises, they are also displayed at the entrances to and within the dance areas.
24. In terms of the Code of Conduct for Performers, these are displayed within performer changing areas. Further copies are kept in the upstairs office.
25. The atrium area is covered by closed-circuit television, and we have two further cameras outside the Premises on Whitechapel Road.
26. In terms of CCTV coverage there are a total of 16 cameras situated on the ground floor of the Premises covering all areas that customers have access to except for the toilets. Most of the CCTV cameras (10 in total) cover the two dance areas.
27. We employ three SIA Door Supervisors at any one time. One, as explained above, is stationed outside the front door in the atrium area. The other two SIA door supervisors are located inside the Premises. One is located outside the dance area by the entrance

to the female toilets and the other is situated towards the rear of the Premises near the male toilets. From time to time each SIA Door Supervisor will conduct a sweep of the Premises including the dance areas.

28. In addition to myself, we employ 4 managers at the Premises and 2 further bar staff. The managers (who we call relief managers) are:
 - a. Alcir Orlandi
 - b. Daniel Habte
 - c. Shamsheer Singh; and
 - d. Saab Binning.
29. Saab is the senior manager of the group.
30. At any one time we have roughly 25 to 30 performers who perform at the Premises. They do not all perform at the same time and at most, we will have between 10 and 12 performers at the Premises at any given time down to about 4 or 5 during quiet periods.
31. Performers operate in two shifts. The first shift covers lunchtime and the afternoon, the second the evening until close of business. We try our best to accommodate performer's wishes when scheduling performers shift patterns.
32. We have had issues with performers before, but nothing like we have experienced here. We have had to warn performers about breach of rules but have never had to instantly dismiss anybody as was the case here.

INCIDENT LEADING TO THIS APPLICATION

33. It is perhaps easier if I approach matters chronologically and following my timeline (**MC1**) to help the Licensing Committee understand what took place and when.
34. On 18 August 2022, two undercover officers instructed by Tower Hamlets Council ("the Council") visited the Premises for what the Council call a "mystery shopper" visit.
35. I was unaware of the undercover officers' covert visit to the Premises until 13 September 2022 when I was made aware by email.
36. During their visit the undercover officers observed breaches of the Premises' SEV licence by two performers who had recently started work at the Premises – Patricia and Maya. Patricia and Maya commenced work at the Premises at the start of August 2022.

37. The breaches observed are unacceptable. They will be unacceptable to you, and they are unacceptable to me and to my management team. They are **not** indicative of how my Premises operates or what happens there on a day-to-day basis.
38. On 19 August 2022, I received a telephone call from my manager, Saab Binning (“**Saab**”). I have regular conversations with Saab about how the Premises is operating.
39. During the telephone conversation Saab told me that he had concerns about some of the new performers we had taken on at the venue, specifically Maya, Patricia, and another performer called Elena.
40. Saab explained that he had been told by some of our other performers that these performers (Patricia, Elena, and Maya) had been seen to be breaching our Code of Conduct for Performers and thereby, potentially, breaching the conditions of the SEV Licence.
41. Saab said that he didn’t feel that he had enough evidence to take further action at that time as it was only gossip between and about performers.
42. I told Saab that we have to take such things extremely seriously. I asked Saab to conduct dip sampling of CCTV footage involving performances by Patricia, Elena, and Maya and to see whether any of their performances breached our Code of Conduct for Performers. I asked Saab to report back to me when he had viewed the footage.
43. Saab telephoned me later that day (19 August 2022) confirming that he had observed breaches of the Code of Conduct for Performers by each of Patricia, Elena, and Maya and that those breaches had been repeated and were serious. I asked Saab whether each of those performers had been given an induction at the Premises and he confirmed that he had. The induction process would have covered all the policies and procedures that we have in place at the Premises including how performances are and are not to be provided.
44. I also asked Saab whether he had been conducting the daily briefings for performers that should take place daily. These briefings are used to remind performers before the start of each shift about our standards. Saab confirmed that the briefings had been taking place and that each of the performers noted (Patricia, Elena, and Maya) had attended a briefing before each shift that they had worked at the Premises.
45. As of 19 August 2022 (Friday) I resolved to suspend Patricia, Elena, and Maya from working at the Premises. They were next scheduled to perform on 20 August 2022 (Saturday) evening.
46. I prepared three letters, one each for Patricia (██████████), Elena (██████), and Maya (██████████) notifying them that they were suspended from performing at the Premises pending a full investigation. The letters were given to the performers by me when they

attended the Premises on 20 August 2022. They were allowed to collect any belongings that they had in the changing rooms and were then asked to leave.

47. The relevant performers (Patricia, Elena, and Maya) were suspended from the Premises and unable to perform there as of 20 August 2022. I exhibit as **MC/3** copies of the letters handed to the relevant performers on 20 August 2022.
48. I was concerned that there might be other performers breaching our Code of Conduct for Performers beyond Patricia, Elena, and Maya. Post-Covid we had taken on several new performers at the Premises to replace those who left the United Kingdom altogether.
49. I employ a rigorous compliance regime at the Premises and have done since I took over. The regime was supplemented by an external consultant appointed in 2017.
50. The compliance regime is spearheaded by Andrew Bamber ("**Andy**") of AB Conformitas. Andy is an experienced ex-Police Officer who was also employed by the Council. Andy will explain in his witness statement precisely what the compliance regime entails but in summary – we regularly put to the test our staff, our performers, and our policies and procedures through a series of overt and covert visits to the Premises. This is backed up by a full risk assessment.
51. I emailed Andy on 20 August 2022 to let him know what had happened. I exhibit a copy of my email to Andy as **MC4**.
52. Andy and I spoke on the telephone, and we agreed several action points for each of us arising out of the suspensions of Patricia etc.
53. For my part, I was going to:
 - a. Conduct a full investigation into performances by the relevant performers;
 - b. Arrange a full briefing for performers to reiterate, above and beyond the daily briefing sessions, our expectations around what is and is not okay; and
 - c. Conduct further dip sampling of dances by other performers to see whether breaches of the Code of Conduct were more widespread.
54. Andy's action points were:
 - a. To review the risk assessment for the Premises and to see whether it needed to be updated;
 - b. To conduct/arrange a series of overt and covert visits to the Premises to see whether breaches of the Code of Conduct were more widespread.

55. I will come on to my investigation into the performances by Patricia, Elena, and Maya and the outcome of that investigation in due course at the relevant point in this statement.
56. The full briefing was arranged and took place on 26 August 2022.
57. Between 20 August and 24 September, I watched approximately 25 hours of CCTV footage covering performances by every performer (including those who had been suspended) at the Premises. I looked specifically for whether customers or performers were breaching our Codes of Conduct.
58. Two things struck me when conducting the dip sampling exercise.
59. First, except for the suspended performers, all the performances that I observed complied with our Code of Conduct for Performers and therefore the conditions of our SEV Licence.
60. Second, in relation to the performances on 18 August by the suspended performers, it seemed to me like a good number of the issues observed were instigated or triggered by the undercover officers repeatedly touching the performers unbidden.
61. I saved several CCTV clips from 18 August 2022 showing compliant dances by other performers. I am happy to disclose these clips if required.
62. It is my view that these clips show that the performances by Patricia, Elena, and Maya, were unique to them and not symptomatic of wider issues at the Premises. This was the conclusion that I drew from what I saw.
63. On 13 September 2022 I received an email from my licensing solicitor, Luke Elford ("Luke") of John Gaunt and Partners, attaching a letter from the Council dated 9 September 2022. I exhibit as **MC5** and **MC6** a copy of the Council's email and letter. I exhibit as **MC7** a copy of the email to me attaching the letter.
64. Given the above and what I had found during my investigations, the letter from the Council did not come as a surprise.
65. Luke acknowledged receipt of the letter to the Council officer. I exhibit as **MC8** a copy of his email to Mohshin Ali dated 13 September 2022. I spoke to Luke on the telephone on 13 September 2022 and we agreed that we would assist the Council by providing whatever help they needed in relation to their investigation.
66. On 14 September 2022 I emailed Luke confirming that I would download the relevant footage so that it could be provided to the Council officer. I also asked for help pulling together the documents that the Council officer had requested. I exhibit as **MC9** my email to Luke.

67. By 16 September 2022 I had downloaded and saved all the footage requested by the Council officer. I handed the footage to Luke to deliver. Luke sent an initial response to the Council, which I exhibit at **MC10** together with a list of all the performers (stage names) that were on duty on the evening of 18 August 2022. I exhibit the latter as **MC11**.
68. I expected that the Council would want the information as quickly as possible, so I was surprised when Luke had to chase the Council officer to arrange to handover the footage. My understanding is that Luke chased on 21 and 23 September 2022 respectively and I exhibit a copy of those emails as **MC12** and **MC13**.
69. The Council officer responded on 26 September 2022 and I exhibit a copy of that email as **MC14**. Luke liaised with the Council officer about when to attend Mulberry Place and hand over the footage and it was agreed that he would do so on 4 October 2022. I exhibit as **MC15** and **MC16** emails in relation to that.
70. The footage was handed over at the Council offices (Mulberry Place) on 4 October 2022.
71. On the same day (4 October 2022) I wrote to each of the suspended performers (Patricia, Maya, and Elena) informing them that they would no longer be permitted to perform at the Premises and, effectively, dismissing them. I exhibit as **MC17** copies of those letters.
72. None of the performers (Patricia, Elena, or Maya) have performed at the Premises since 18 August 2022.
73. In relation to the second part of the Council's request, which was for details of the performers who performed for the undercover officers (Patricia and Maya) I provided this to Luke on 4 October 2022 and 5 October 2022 respectively. I exhibit as **MC18** and **MC19** the details I provided for Patricia. I exhibit as **MC20** and **MC21** the details I provided for Maya.
74. Luke provided Patricia's details to the Council officer on 5 October 2022. I exhibit that email as **MC22**. Luke provided Maya's details to the Council officer on 7 October 2022 and I exhibit that email as **MC23**.
75. On 11 October 2022 Luke emailed the Council officer to ask whether he had viewed the footage provided. I exhibit a copy of that email as **MC24**.
76. On 14 October 2022 the Council officer responded to say that the footage hadn't been viewed yet. I exhibit that email as **MC25**. I was surprised by this. No response was offered, or ever has been offered, to the touching initiated by one of the undercover officers.
77. On 21 October 2022 the Council officer emailed to say that the Council were going through the footage. I exhibit a copy of that email as **MC26**. This seemed like a holding response.

78. We then heard nothing from the Council at all for nearly two months before receiving an emailed letter on 15 December 2022 informing us that the Council would not be prosecuting for breaches of the SEV Licence. I exhibit as **MC27** and **MC28** the email and letter respectively. From our point of view, we felt that a line had been drawn under the matter and that no further action would be taken.
79. Not having had any correspondence since December 2022, we were very surprised to receive the Council officer's letter by email on 24 February 2023, some 6 months after the visit took place. We hadn't heard from the Council at all between 16 December 2022 and 23 February 2023. I exhibit as **MC29** and **MC30** copies of that email and letter.

SUMMARY

80. I was made aware of an issue regarding certain performers by my manager at the Premises.
81. The performers involved were all relatively recently employed from another venue.
82. None of the performers involved performed at the Premises again after 18 August 2022. They were suspended on 20 August 2022 and dismissed on 4 October 2022 following a full and thorough investigation.
83. Our response to the issues was swift and decisive and I am not sure what else we could have done under the circumstances.
84. I appreciate that the behaviour of the three performers (Patricia, Maya, and Elena) was unacceptable, but it is not indicative of wider problems at the Premises.
85. We operate an extremely robust compliance regime and will continue to do so.
86. I respectfully ask the Council to reject the application to revoke the SEV Licence.

I believe that the facts stated in this witness statement are true to the best of my knowledge and belief.

Signed: 

Manpal Clair

Date: 8 MAY 2023

Made on behalf of SEV Licence Holder

Dated: 8 May 2023

Before Tower Hamlets Council's Licensing Committee

Sch. 3 of the Local Government (Miscellaneous Provisions) Act 1982 (as amended)

Tower Hamlets Council (as a Licensing
Authority)

Applicant

and

NH License Ltd

SEV Licence Holder

Exhibit List – Manpal Clair

Exhibit	Document
MC1	Timeline of events
MC2	Email from Mark Perry 31 March 2023
MC3	Suspension letters 20 August 2022
MC4	Email to Andy Bamber 20 August 2022
MC5	Council email 9 September 2022
MC6	Council letter 9 September 2022
MC7	Email Luke Elford to Manpal Clair 13 September 2022
MC8	Email Luke Elford to Mohshin Ali 13 September 2022

MC9	Email Manpal Clair to Luke Elford 14 September 2022
MC10	Email Luke Elford to Mohshin Ali 16 September 2022
MC11	List of performers on duty 18 August 2022
MC12	Email Luke Elford to Mohshin Ali 21 September 2022
MC13	Email Luke Elford to Mohshin Ali 23 September 2022
MC14	Email Mohshin Ali to Luke Elford 26 September 2022
MC15	Email Luke Elford to Mohshin Ali 28 September 2022
MC16	Email Luke Elford to Mohshin Ali 3 October 2022
MC17	Dismissal letters 4 October 2022
MC18	Email Manpal Clair to Luke Elford 4 October 2022
MC19	Performer documents (Patricia)
MC20	Email Manpal Clair to Luke Elford 5 October 2022
MC21	Performer documents (Maya)
MC22	Email Luke Elford to Mohshin Ali 5 October 2022
MC23	Email Luke Elford to Mohshin Ali 7 October 2022
MC24	Email Luke Elford to Mohshin Ali 11 October 2022

MC25	Email Mohshin Ali to Luke Elford 14 October 2022
MC26	Email Mohshin Ali to Luke Elford 21 October 2022
MC27	Council email 15 December 2022
MC28	Council letter 15 December 2022
MC29	Council email 24 February 2023
MC30	Council letter 24 February 2023
MC31	Layout Plan of the Premises

MC/1 – Nags Head Timeline

Date	What Happened
18/08/22	Undercover officers instructed by the Council visit the Premises (unknown to Premises until 13 September 2022).
19/08/22	My manager, Saab Binning, expressed concerns to me by telephone about performances provided by certain performers at the Premises.
19/08/22	I instructed Saab to undertake dip sampling of the relevant performers to see whether breaches of our Code of Conduct had taken place.
19/08/22	Saab confirmed to me verbally that he had observed breaches of our Code of Conduct. I resolved to suspend the performers involved pending further investigation.
20/08/22	I write to each of the performers identified by Saab in his dip sampling (Patricia, Maya, and Elena) suspending them from performing at the premises.
20/08/22	I sent an email to Andy Bamber (Compliance Consultant) explaining what had happened and we spoke on the telephone. Andy agreed that I needed to investigate what had happened and take decisive action.
09/09/22	Council's letter sent by post and email.
13/09/22	Council's letter forwarded to me by licensing solicitor.
13/09/22	Licensing solicitor confirms receipt of Council's letter by email.
14/09/22	I acknowledge receipt of the letter and confirm that I will download the footage as requested.
16/09/22	I confirm to my licensing solicitor that the footage is ready for collection.
16/09/22	Initial response to Council letter sent by my licensing solicitor together with a list of performers on duty on 18 August 2022.
21/09/22	Licensing solicitor chases Council officer for a response to email dated 16 September 2022.
23/09/22	Licensing solicitors again chases Council officer for a response to email dated 16 September 2022 and provides CCTV data release form.
26/09/22	Council officer responds.

28/09/22	Liaison between Council officer and licensing solicitor about dropping off footage to Mulberry Place.
03/10/22	Council officer and licensing solicitor agree for licensing solicitor to drop off footage at 2pm on 4 October 2022.
04/10/22	I provide performer documentation for "Patricia" ([REDACTED]) to my licensing solicitor for onward transmission to Council officer.
04/10/22	I write to each of the performers (Patricia, Maya, and Elena) dismissing them from the premises forthwith.
05/10/22	I provide performer documentation for "Maya" (identified as Mia by undercover officers) to my licensing solicitor for onward transmission to the Council officer.
05/10/22	Licensing solicitor provides performer documentation for Patricia to Council officer.
06/10/22	Licensing solicitor queries whether documents for Maya needed (as identified as Mia by undercover officers). Council officer confirms required and licensing solicitor confirms will be provided.
07/10/22	Licensing solicitor provides performer documentation for Maya to Council officer.
11/10/22	Licensing solicitor asks council officer whether he has viewed cctv footage provided.
14/10/22	Council officer confirms footage is yet to be viewed.
21/10/22	Council officer emails licensing solicitor confirming that licensing authority is going through footage.
22/10/22 – 14/12/22	No correspondence from Council officer regarding investigation.
15/12/22	Email from Council officer attaching letter confirming that the licensing authority will not prosecute for breaches.
16/12/22 – 23/02/23	No correspondence from Council officer regarding investigation.
24/02/23	Email from Council officer attaching letter confirming application to revoke SEV licence.

From: MARK.J.Perry [REDACTED] CEMailbox-
.TowerHamletsLicensing@met.police.uk
Sent: Friday, March 31, 2023 2:39 PM
To: Luke Elford <[REDACTED]>
Cc: Heidi Lawrance [REDACTED]
Subject: RE: Nags License Ltd - The Nags Head, 17 - 19 Whitechapel Road London - Visits to Premises

Hi Luke,

Police Licensing conducted two visits to the premises on 12 April 2018 and 6 November 2015 no issues were found.

A general Police visit was conducted on the 21st November 2019 again with no issues.

For a more detailed response you may wish to consider a FOI request.

Kind Regards

Mark



PC Mark Perry
Central East Licensing Unit
Metropolitan Police Service (MPS)
[REDACTED]
Email [REDACTED]
A: Licensing Office, 1st Floor Stoke Newington Police Station



Nags Head
17-19 Whitechapel Road
London
E1 1DU

Date 20th August 2022

Dear [REDACTED]

Re: Investigation of Breach of SEV Licence Condition / Breach of Performer Code of Conduct - SUSPENSION LETTER

During routine sampling of the venue's CCTV footage it appears that you may have breached our SEV Licence conditions and our Performer Code of Conduct.

I will be investigating further CCTV footage and speaking with the venue management as part of our disciplinary procedures.

Whilst those investigations are ongoing I must ask you not to attend The Nags Head.

Please take this letter as confirmation that you are **suspended from attending at/performing at the premises**.

I will write to you at the conclusion of my investigations letting you know the outcome.

If you have any queries concerning this letter, please contact me at info@nagsheadgentlemensvenue.com.

Yours sincerely,

[REDACTED]

**Manpal Clair
Director
NH License Ltd**

Registered office
NH License Ltd, Kemp House, 160 city road, London, Ec1v 2nx
Company No. 12523134

Nags Head
17-19 Whitechapel Road
London
E1 1DU

Date 20th August 2022

Dear [REDACTED]

Re: Investigation of Breach of SEV Licence Condition / Breach of Performer Code of Conduct - SUSPENSION LETTER

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I will write to you at the conclusion of my investigations letting you know the outcome.

If you have any queries concerning this letter, please contact me at info@nagsheadgentlemensvenue.com.

Yours sincerely,

[REDACTED]

Manpal Clair
Director
NH License Ltd

Nags Head
17-19 Whitechapel Road
London
E1 1DU

Date 20th August 2022

Dear [REDACTED]

Re: Investigation of Breach of SEV Licence Condition / Breach of Performer Code of Conduct - SUSPENSION LETTER

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If you have any queries concerning this letter, please contact me at info@nagsheadgentlemensvenue.com.

Yours sincerely,

[REDACTED]

Manpal Clair
Director
NH License Ltd

From: manpal singh M [REDACTED]
Subject: Nags Head - Urgent
Date: 20 Aug 2022 at 11:28:47
To: andrew bamber [REDACTED]

Andy

As you know I have recruited many new staff post covid and as you are aware I've been conscious that new performorrs need to learn the rules. Since all the annual checks have been taken, we have undertaken dip sampling and have come across a incident that I'm most unhappy with. As a result I have suspended the individuals.

I am going to reiterate all the house rules and standards in the next couple of days with all my staff and I would like a number of visits undertake to check on the staff, would that be acceptable.

You know I don't allow this sort of stuff and it's unacceptable and it's got to be dealt with quickly and effectively

Thanks

Manu
Manpal Singh Clair

From: Mohshin Ali [REDACTED]
Sent: Friday, September 9, 2022 2:43 PM
To: Luke Elford <[REDACTED]>
Subject: Nags Head, 17-19 Whitechapel Road, London

Dear Sir/Madam,

Re: Nags Head, "Nags Head Public House", 17-19 Whitechapel Road, London
Local Governmental (Miscellaneous Provisions) Act 1982 as amended by the Policing and
Crime Act 2009

Please see the attached. The hard copy is in the post.

Kind regards,

Mohshin Ali
Senior Licensing Officer
Licensing and Safety Team
Environmental Health & Trading Standards
Place Directorate
Mulberry Place
5 Clove Crescent
London E14 2BG

[REDACTED]
www.towerhamlets.gov.uk  licensing@towerhamlets.gov.uk

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Place Directorate

Environmental Health and Trading Standards

Head of Service: **David Tolley**

2nd Floor, Mulberry Place
5 Clove Crescent
London E14 2BG

Tel: [REDACTED]
Enquiries to: **Mohshin Ali**
Email: [REDACTED]

www.towerhamlets.gov.uk

NH License Ltd
Kemp House
160 City Road
London
EC1v 2NX

9th September 2022

Dear Sir/Madam,

Re: Nags Head, "Nags Head Public House", 17-19 Whitechapel Road, London Local Governmental (Miscellaneous Provisions) Act 1982 as amended by the Policing and Crime Act 2009

I write in response to an investigation into a possible breach of your Sexual Entertainment Venue Licence, which was deemed granted by this authority under the above legislation on 27th May 2022.

During a mystery shopper operation within the premises on 18th August 2022 found touching occurring by the performer to the mystery shopper, namely pushing of the breast in face of the Mystery Shoppers, kissing of their neck and grinding into the groin areas.

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 18th August 2022 at 23:00 hours to Friday 19th August at 00:00 hours serving the below. Please make sure that recordings are viewable by date and time.



1. All VIP booths in the VIP Dance Area 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 date/time in which we can collect these recordings.

Yours sincerely,



Mohshin Ali
Senior Licensing Officer
Environmental Health and Trading Standards

Cc Luke Elford, Solicitor 



From: Luke Elford [REDACTED] >
Sent: Tuesday, September 13, 2022 12:21 PM
To: Manpal Singh Clair [REDACTED]
Subject: Fwd: Nags Head, 17-19 Whitechapel Road, London

Dear Manu,

With apologies for the delay in getting this over to you - please see attached and below from Tower Hamlets Council in relation to alleged breaches of condition on 18 August.

I haven't had a chance to consider the detail as yet, or whether the request is DPA/GDPR compliant, but can you please retain the footage requested from 23:00 to 00:00 as a starting point and we can go from there.

I have some concerns about the use of undercover officers (again!) for licensing visits and we can explore those when we speak.

Please acknowledge receipt and let me know when footage downloaded/information available.

Thanks.

Kind regards,
Luke Elford

Partner

LElford [REDACTED]

www.john-gaunt.co.uk

T: [REDACTED]

M: [REDACTED]

Sent from my mobile. Please excuse typos.

From: Mohshin Ali <[REDACTED]>
Sent: Friday, September 9, 2022 2:42:45 PM
To: Luke Elford <[REDACTED]>
Subject: Nags Head, 17-19 Whitechapel Road, London

Dear Sir/Madam,

Re: Nags Head, "Nags Head Public House", 17-19 Whitechapel Road, London
Local Governmental (Miscellaneous Provisions) Act 1982 as amended by the Policing and
Crime Act 2009

Please see the attached. The hard copy is in the post.

Kind regards,

Mohshin Ali
Senior Licensing Officer
Licensing and Safety Team
Environmental Health & Trading Standards
Place Directorate
Mulberry Place

5 Clove Crescent
London E14 2BG

 
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From: Luke Elford <[REDACTED]>
Sent: Tuesday, September 13, 2022 12:16 PM
To: Mohshin Ali <[REDACTED]>
Subject: Re: Nags Head, 17-19 Whitechapel Road, London

Hi Mohshin,

Just seen this and other email with licence. Acknowledging receipt.

I will pass this request on to client, and they will, or I will, be in touch. Haven't looked at the detail yet.

Quick thing - I see the letter is addressed to client's registered office - is that the only place it was sent, or was it posted to the premises also? Was the letter sent recorded/special delivery, or just by first/second class post?

Please confirm.

Thanks.

Kind regards,
Luke Elford

Partner

LElford@[REDACTED]

www.john-gaunt.co.uk

T: [REDACTED]

M: [REDACTED]

Sent from my mobile. Please excuse typos.

From: Mohshin Ali <[REDACTED]>
Sent: Friday, September 9, 2022 2:42 pm
Subject: Nags Head, 17-19 Whitechapel Road, London

Dear Sir/Madam,

Re: Nags Head, "Nags Head Public House", 17-19 Whitechapel Road, London
Local Governmental (Miscellaneous Provisions) Act 1982 as amended by the Policing and
Crime Act 2009

Please see the attached. The hard copy is in the post.

Kind regards,

Mohshin Ali
Senior Licensing Officer
Licensing and Safety Team
Environmental Health & Trading Standards
Place Directorate

Mulberry Place
5 Clove Crescent
London E14 2BG


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From: manpal singh <[REDACTED]>
Sent: Wednesday, September 14, 2022 3:44 PM
To: Luke Elford <[REDACTED]>
Subject: Re: Nags Head, 17-19 Whitechapel Road, London

Hi Luke

Thanks for sending this over.

I'll download the footage as you've suggested and get the records together.

Can you help with what we are required to provide them?

Happy to help the council with the investigation but I don't want to hand over something I'm not meant to and end up with the ICO breathing down my neck.

I'll let you know when that's done and we can review.

Thanks,

Manu

Manu
Manpal Singh Clair

On 13 Sep 2022, at 12:21, Luke Elford <[REDACTED]> wrote:

Dear Manu,

With apologies for the delay in getting this over to you - please see attached and below from Tower Hamlets Council in relation to alleged breaches of condition on 18 August.

I haven't had a chance to consider the detail as yet, or whether the request is DPA/GDPR compliant, but can you please retain the footage requested from 23:00 to 00:00 as a starting point and we can go from there.

I have some concerns about the use of undercover officers (again!) for licensing visits and we can explore those when we speak.

Please acknowledge receipt and let me know when footage downloaded/information available.

Thanks.

Kind regards,
Luke Elford

Partner

LElford@[REDACTED]
www.john-gaunt.co.uk

T: [REDACTED]

M: [REDACTED]

Sent from my mobile. Please excuse typos.

From: Mohshin Ali <[REDACTED]>
Sent: Friday, September 9, 2022 2:42:45 PM
To: Luke Elford <[REDACTED]>
Subject: Nags Head, 17-19 Whitechapel Road, London

Dear Sir/Madam,

Re: Nags Head, "Nags Head Public House", 17-19 Whitechapel Road, London
Local Governmental (Miscellaneous Provisions) Act 1982 as amended by the Policing and
Crime Act 2009

Please see the attached. The hard copy is in the post.

Kind regards,

Mohshin Ali
Senior Licensing Officer
Licensing and Safety Team
Environmental Health & Trading Standards
Place Directorate
Mulberry Place
5 Clove Crescent
London E14 2BG

[REDACTED] [REDACTED]
www.towerhamlets.gov.uk  licensing@towerhamlets.gov.uk

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Partners: Tim Shield (569713) | Michelle Hazlewood (569714)
Christopher Grunert | Jon Wallsgrove | Patrick Robson | Luke Elford
Practice Manager: Jonathan Pupius

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From: Luke Elford
Sent: Friday, September 16, 2022 6:13 PM
To: Mohshin Ali <[REDACTED]>
Subject: RE: Nags Head, 17-19 Whitechapel Road, London
Importance: High

Dear Mohshin,

**Re: Nags Head, "Nags Head Public House", 17-19 Whitechapel Road, London
Local Government (Miscellaneous Provisions) Act 1982 as amended by the Policing
and Crime Act 2009**

I write further to your letter of 9 September 2022 (copy attached), which was sent to NH License Ltd's registered office by post. A further copy of that letter was hand delivered to the venue on 13 September 2022.

My client has now downloaded and secured the footage requested in accordance with condition 12 of the Tower Hamlets Standard Conditions for Sexual Entertainment venues.

My client is happy to drop the footage off to Mulberry Place. Shall we mark it for your attention? We will need someone to sign for the footage and that person will also need to complete our CCTV footage request form. This is a form that we ask all agencies to complete when taking possession of our CCTV footage and forms part of our Data Protection policy.

I have had a brief opportunity to view the footage and it is fair to say does not make for happy viewing. Having said that, and you wouldn't have been aware of this, the behaviour of the performers involved was actually flagged by my client's staff as part of my client's own internal due diligence mechanism.

The performers that can be seen on the footage are new to the venue (post-Covid – I don't have the precise date to hand but can get it if needed) having joined the Nags Head from other venues.

Concerns about the way in which performances were being delivered by those performers were flagged by staff to management and dip sampling of CCTV footage of performances was undertaken. The dip sampling revealed, inter alia, breaches of my client's Performer and Customer Codes of Conduct. This triggered my client's internal disciplinary procedures and the Performers involved were suspended. I am more than happy to expand on the actions taken by my client once you have had a chance to review the footage and as your investigations progress. If a meeting to discuss would help, I'm more than happy to arrange one.

I do need your help though, please, with the second part of your request. You have asked for **"copies of staff logs for these dates/time [sic], including security, management and dancers in line with conditions 28 and 29."**

Forgive me, but I cannot see what part of Condition 28 or Condition 29 (both Tower Hamlets Standard Conditions for Sexual Entertainment Venues) obliges us to provide staff logs/security logs etc? I don't think we will have a problem providing you with

that information, but I just wonder whether Conditions 28 and 29 are the right provisions. Do you in fact mean a different condition or conditions? If so, please confirm which condition(s).

I am uncomfortable about the possible ramifications of releasing to you the full records of each and every performer who was performing at the venue on 18 August. That is a significant amount of personal information. Attached is a list of the Performers that worked on the evening of 18 August, and I would be grateful if you would please indicate which Performer Records you require. Presumably, the Undercover Officers, or as you refer to them, the Mystery Shoppers, can (or already have?) provided you with the names of the Performers involved? Please confirm.

As soon as you tell us which records you require, they will be provided to you without delay.

For the avoidance of doubt, and just so there is no misunderstanding between us, we are not refusing to give you the information you are asking for. Rather, we would simply like you to narrow your request so that we don't inadvertently disclose more personal data than is necessary and proportionate. The disclosure of personal data is a sticky wicket and one that I am sure the council understand. Effectively we are inviting you to make your request DPA/GDPR compliant.

Please do come back to me about how best for us to deliver the footage to you and the second part of your request (staff logs etc.).

With my best wishes.

Kind Regards

Luke Elford

Partner

LElford [REDACTED] | www.john-gaunt.co.uk

T: [REDACTED]



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From: Mohshin Ali <[REDACTED]>

Sent: 09 September 2022 14:43

To: Luke Elford <[REDACTED]>

Subject: Nags Head, 17-19 Whitechapel Road, London

Dear Sir/Madam,

**Re: Nags Head, "Nags Head Public House", 17-19 Whitechapel Road, London
Local Governmental (Miscellaneous Provisions) Act 1982 as amended by the Policing and
Crime Act 2009**

Please see the attached. The hard copy is in the post.

Kind regards,

Mohshin Ali

Senior Licensing Officer
Licensing and Safety Team
Environmental Health & Trading Standards
Place Directorate
Mulberry Place
5 Clove Crescent
London E14 2BG


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Nags Head

17-19 Whitechapel Road, London E1

Performers on duty 18 August 2022 (evening shift)

- 1. KARINA**
- 2. TATI**
- 3. DANIELLA**
- 4. ELENA**
- 5. LOUISA**
- 6. AMANDA**
- 7. CHLOE**
- 8. MAYA**
- 9. PATRICIA**
- 10. VICKI**

From: Luke Elford <[REDACTED]>
Sent: Wednesday, September 21, 2022 7:08 AM
To: Mohshin Ali <[REDACTED]>
Subject: Re: Nags Head, 17-19 Whitechapel Road, London

Hi Mohshin,

Just following up on the below please.

I am in a review hearing out of town for most of today but will be checking emails intermittently.

I can also (once I am back in front of a computer) send across the form that we would like completed when we release the CCTV footage.

Thanks.

Kind regards,

Luke Elford

Partner

LElford [REDACTED]
www.john-gaunt.co.uk

T: [REDACTED]
[REDACTED]

Sent from my mobile. Please excuse typos.

From: Luke Elford
Sent: Friday, September 16, 2022 6:12:55 PM
To: Mohshin Ali <[REDACTED]>
Subject: RE: Nags Head, 17-19 Whitechapel Road, London

Dear Mohshin,

**Re: Nags Head, "Nags Head Public House", 17-19 Whitechapel Road, London
Local Government (Miscellaneous Provisions) Act 1982 as amended by the Policing
and Crime Act 2009**

I write further to your letter of 9 September 2022 (copy attached), which was sent to NH License Ltd's registered office by post. A further copy of that letter was hand delivered to the venue on 13 September 2022.

My client has now downloaded and secured the footage requested in accordance with condition 12 of the Tower Hamlets Standard Conditions for Sexual Entertainment venues.

My client is happy to drop the footage off to Mulberry Place. Shall we mark it for your attention? We will need someone to sign for the footage and that person will also need to complete our CCTV footage request form. This is a form that we ask all agencies to complete when taking possession of our CCTV footage and forms part of our Data Protection policy.

I have had a brief opportunity to view the footage and it is fair to say does not make for happy viewing. Having said that, and you wouldn't have been aware of this, the behaviour of the performers involved was actually flagged by my client's staff as part of my client's own internal due diligence mechanism.

The performers that can be seen on the footage are new to the venue (post-Covid – I don't have the precise date to hand but can get it if needed) having joined the Nags Head from other venues.

Concerns about the way in which performances were being delivered by those performers were flagged by staff to management and dip sampling of CCTV footage of performances was undertaken. The dip sampling revealed, inter alia, breaches of my client's Performer and Customer Codes of Conduct. This triggered my client's internal disciplinary procedures and the Performers involved were suspended. I am more than happy to expand on the actions taken by my client once you have had a chance to review the footage and as your investigations progress. If a meeting to discuss would help, I'm more than happy to arrange one.

I do need your help though, please, with the second part of your request. You have asked for ***“copies of staff logs for these dates/time [sic], including security, management and dancers in line with conditions 28 and 29.”***

Forgive me, but I cannot see what part of Condition 28 or Condition 29 (both Tower Hamlets Standard Conditions for Sexual Entertainment Venues) obliges us to provide staff logs/security logs etc? I don't think we will have a problem providing you with that information, but I just wonder whether Conditions 28 and 29 are the right provisions. Do you in fact mean a different condition or conditions? If so, please confirm which condition(s).

I am uncomfortable about the possible ramifications of releasing to you the full records of each and every performer who was performing at the venue on 18 August. That is a significant amount of personal information. Attached is a list of the Performers that worked on the evening of 18 August, and I would be grateful if you would please indicate which Performer Records you require. Presumably, the Undercover Officers, or as you refer to them, the Mystery Shoppers, can (or already have?) provided you with the names of the Performers involved? Please confirm.

As soon as you tell us which records you require, they will be provided to you without delay.

For the avoidance of doubt, and just so there is no misunderstanding between us, we are not refusing to give you the information you are asking for. Rather, we would simply like you to narrow your request so that we don't inadvertently disclose more personal data than is necessary and proportionate. The disclosure of personal data is a sticky wicket and one that I am sure the council understand. Effectively we are inviting you to make your request DPA/GDPR compliant.

Please do come back to me about how best for us to deliver the footage to you and the second part of your request (staff logs etc.).

With my best wishes.

Kind Regards

Luke Elford

Partner

LElford@ [REDACTED] | www.john-gaunt.co.uk

T: [REDACTED]



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From: Luke Elford
Sent: Friday, September 23, 2022 6:53 PM
To: Mohshin Ali <[REDACTED]>
Subject: RE: Nags Head, 17-19 Whitechapel Road, London

Hi Mohshin,

Just following up on my emails below again, please.

I haven't got your out of office, but maybe you are away?

Please find attached the form that will need to be completed when taking receipt of the footage that we have been ready to supply since my email of 16 September.

Kind Regards

Luke Elford
Partner

LElford [REDACTED] www.john-gaunt.co.uk
T: [REDACTED]



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From: Luke Elford [REDACTED]
Sent: 21 September 2022 07:08
To: Mohshin Ali <[REDACTED]>
Subject: Re: Nags Head, 17-19 Whitechapel Road, London

Hi Mohshin,

Just following up on the below please.

I am in a review hearing out of town for most of today but will be checking emails intermittently.

I can also (once I am back in front of a computer) send across the form that we would like completed when we release the cctv footage.

Thanks.

Kind regards,
Luke Elford

Partner
LElford [REDACTED]

www.john-gaunt.co.uk



Sent from my mobile. Please excuse typos.

From: Mohshin Ali <[REDACTED]>
Sent: Monday, September 26, 2022 4:59:43 PM
To: Luke Elford [REDACTED]
Subject: RE: Nags Head, 17-19 Whitechapel Road, London

Dear Luke,

Apologies, I will respond later this week as I am currently dealing with other cases that have taken priority.

Also, I will be at Mulberry Place on Tuesday and Thursday if your client wanted to drop off the footage.

Thanks

Mohshin Ali
Senior Licensing Officer
Licensing and Safety Team
Environmental Health & Trading Standards
Place Directorate
Mulberry Place
5 Clove Crescent
London E14 2BG

[REDACTED]
www.towerhamlets.gov.uk  licensing@towerhamlets.gov.uk

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From: Luke Elford
Sent: Wednesday, September 28, 2022 3:45 PM
To: Mohshin Ali <[REDACTED]>
Subject: RE: Nags Head, 17-19 Whitechapel Road, London

Hi Mohshin,

I've got the footage so will need to drop it off/collect signed release form.

I'm not about tomorrow though as up in Sheffield.

When are you about next week? Can drop off to someone else if that's not convenient?

Kind Regards

Luke Elford
Partner

LElford [REDACTED] -gaunt.co.uk
T: [REDACTED]



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For more details on our services please click on the links above.

From: Mohshin Ali <[REDACTED]>
Sent: 26 September 2022 17:00
To: Luke Elford [REDACTED]
Subject: RE: Nags Head, 17-19 Whitechapel Road, London

Dear Luke,

Apologies, I will respond later this week as I am currently dealing with other cases that have taken priority.

Also, I will be at Mulberry Place on Tuesday and Thursday if your client wanted to drop off the footage.

Thanks

Mohshin Ali
Senior Licensing Officer
Licensing and Safety Team
Environmental Health & Trading Standards

Place Directorate
Mulberry Place
5 Clove Crescent
London E14 2BG


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From: Mohshin Ali <[REDACTED]>
Sent: Monday, October 3, 2022 1:48 PM
To: Luke Elford [REDACTED]
Subject: RE: Nags Head, 17-19 Whitechapel Road, London

Dear Luke,

I'll see you tomorrow at 2pm.

In relation to the second part of the request, please provide the details for "Patricia" for now.

The other performer was named by the Mystery Shopper as "Mia" which I assume should be "Maya"

Thanks

Mohshin Ali
Senior Licensing Officer
Licensing and Safety Team
Environmental Health & Trading Standards
Place Directorate
Mulberry Place
5 Clove Crescent
London E14 2BG

[REDACTED]
www.towerhamlets.gov.uk  licensing@towerhamlets.gov.uk

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From: Luke Elford <[REDACTED]>
Sent: 30 September 2022 17:03
To: Mohshin Ali <[REDACTED]>
Subject: Re: Nags Head, 17-19 Whitechapel Road, London

Thanks - next Tuesday works. If I come to Mulberry Place for 2pm is that okay? I'll send an invite as a reminder.

Have you had a chance to have a look at the second part of my email so that we can lawfully comply with second part of your request (performer IDs and rights to work)?

Kind regards,
Luke Elford

Partner

LElford [REDACTED]
www.john-gaunt.co.uk

T: [REDACTED]

Sent from my mobile. Please excuse typos.

From: Mohshin Ali <[REDACTED]>
Sent: Friday, September 30, 2022 4:48:07 PM
To: Luke Elford [REDACTED]
Subject: RE: Nags Head, 17-19 Whitechapel Road, London

Dear Luke,

I am around next Tuesday and Friday. On different days, one of my colleague's will be around for collection. Alternatively, I can arrange for a pick up from the premises.

Thanks

Mohshin Ali
Senior Licensing Officer
Licensing and Safety Team
Environmental Health & Trading Standards
Place Directorate
Mulberry Place
5 Clove Crescent
London E14 2BG

[REDACTED]
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From: Luke Elford [REDACTED] >
Sent: 28 September 2022 15:45
To: Mohshin Ali [REDACTED]
Subject: RE: Nags Head, 17-19 Whitechapel Road, London

Hi Mohshin,

I've got the footage so will need to drop it off/collect signed release form.

I'm not about tomorrow though as up in Sheffield.

When are you about next week? Can drop off to someone else if that's not convenient?

Kind Regards

Luke Elford

Partner

LElford [REDACTED] | www.john-gaunt.co.uk

T: [REDACTED] : 0114 267 9613

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From: Mohshin Ali <[REDACTED]>
Sent: 26 September 2022 17:00
To: Luke Elford <[REDACTED]>
Subject: RE: Nags Head, 17-19 Whitechapel Road, London

Dear Luke,

Apologies, I will respond later this week as I am currently dealing with other cases that have taken priority.

Also, I will be at Mulberry Place on Tuesday and Thursday if your client wanted to drop off the footage.

Thanks

Mohshin Ali
Senior Licensing Officer
Licensing and Safety Team
Environmental Health & Trading Standards
Place Directorate
Mulberry Place
5 Clove Crescent
London E14 2BG

[REDACTED]
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Nags Head
17-19 Whitechapel Road
London
E1 1DU

Date 4th October 2022

Dear [REDACTED]

Re: Investigation of Breach of SEV Licence Condition / Breach of Performer Code of Conduct - DISMISSAL LETTER

I write further to my letter of 20 August 2022.

I have now completed my investigation into potential breaches by you of our SEV Licence conditions and our Performer Code of Conduct.

Having reviewed our CCTV footage and spoken with the General Manager I am satisfied that your behaviour means that you **will no longer be permitted to perform at The Nags Head.**

Please let me know if you have any belongings at the venue and I will arrange for these to be sent to you.

Yours sincerely,

[REDACTED]

Manpal Clair
Director
NH License Ltd

Registered office
NH License Ltd, Kemp House, 160 city road, London, Ec1v 2nx
Company No. 12523134

Nags Head
17-19 Whitechapel Road
London
E1 1DU

Date 4th October 2022

Dear [REDACTED]

Re: Investigation of Breach of SEV Licence Condition / Breach of Performer Code of Conduct - DISMISSAL LETTER

I write further to my letter of 20 August 2022.

I have now completed my investigation into potential breaches by you of our SEV Licence conditions and our Performer Code of Conduct.

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Please let me know if you have any belongings at the venue and I will arrange for these to be sent to you.

Yours sincerely,

[REDACTED]

Manpal Clair
Director
NH License Ltd

Registered office
NH License Ltd, Kemp House, 160 city road, London, Ec1v 2nx
Company No. 12523134

Nags Head
17-19 Whitechapel Road
London
E1 1DU

Date 4th October 2022

Dear [REDACTED]

Re: Investigation of Breach of SEV Licence Condition / Breach of Performer Code of Conduct - DISMISSAL LETTER

I write further to my letter of 20 August 2022.

I have now completed my investigation into potential breaches by you of our SEV Licence conditions and our Performer Code of Conduct.

Having reviewed our CCTV footage and spoken with the General Manager I am satisfied that your behaviour means that you **will no longer be permitted to perform at The Nags Head.**

Please let me know if you have any belongings at the venue and I will arrange for these to be sent to you.

Yours sincerely,

[REDACTED]

**Manpal Clair
Director
NH License Ltd**

Registered office
NH License Ltd, Kemp House, 160 city road, London, Ec1v 2nx
Company No. 12523134

From: manpal singh <[REDACTED]>
Sent: Tuesday, October 4, 2022 6:52 PM
To: Luke Elford [REDACTED]
Subject: Re: Nags Head, 17-19 Whitechapel Road, London

Hi Luke

As per the request from the council please find attached documents for the performer Patricia.

Thanks

Manu
Manpal Singh Clair

On 3 Oct 2022, at 14:00, Luke Elford <LElford@john-gaunt.co.uk> wrote:

Dear Manu,

Please see below.

I have made an appointment to drop off the footage at Mulberry Place at 2pm tomorrow.

In relation to the second part of the council's request, the part we were querying, the council would like the relevant details for Patricia. We now need to supply the following in accordance with condition 28:

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;

1. Performer record – must include proper name, aliases and home address
2. Photo ID
3. Proof of address
4. Right to work documentation

If you can get that over to me please I will pass it on.

The council only want this at the moment because the name of the other performer was given as Mia and that doesn't tally with our records (albeit see comment below about it likely being Maya).

Kind Regards

Luke Elford
Partner

LElford@ [REDACTED] | www.john-gaunt.co.uk
T: [REDACTED] F: 0114 267 9613



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Performer Information

Performers "stage" name: Patricia

Performers Full Name: [REDACTED]

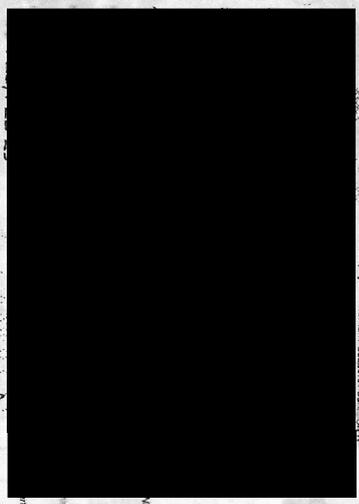
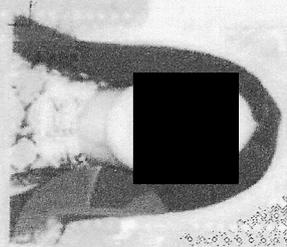
Date of Birth: [REDACTED]

Address: [REDACTED]

Date: 03/08/2022

Review date: 02/08/2023

PASAPORT / PASSEPORT



PASAPORT / PASSEPORT

ROMANIA / ROMANIA / ROUMANIE

Tipul țării / País / Code du pays / 77 / Code du pays / Numéro / Passaport / Pasaport / Tip

[Signature]

Numéro / Signature du titulaire

No. Nr. / pasaport

ROU



12. Înălțimea
Height 165
Taille

13. Culoarea ochilor
Colour of eyes CĂPRUI
Couleur des yeux

14. Domiciliul
Residence
Domicile

do/Sig
Unterschrift
Hajilan nimi/kirjot
Pobis/Aktiras/Simlu an
Hajdtekoning van de houd
podpis/Innehavarens namnskrift
Taille/Height/Yuoc/Visina/Magasság/
Výška/Visina/Längd 13. Culoarea ochilor/Lem
ojos/Silmade värvus/Silmiten väri/Couleur des yeux
Szemszin/Dath na súl/Colore degli occhi/Akku spalva/Act
Kolor oczu/Cor dos olhos/Farba očí/ Barva očí/Ögonfärg/ 14. D
trvalého pobytu/Wohnort/Bopæst/ Domicilio/Elukoht/Asuinpaikka/D
Διευκρίνιση/Prebivalište/Lokalm/Alt chónaithe/Residenza/Gyvenamoji vieta/Dz
Verblijfplaats/Miejsce zamieszkania/Residência/Adresa/Prebivalište/Hemort/





Cardholder

MasterCard Number

Total Credit Limit

Summary **04 July 2022**

Balance brought forward from previous statement	
Payments to your account	
Spending on your account plus any adjustments	+
New Balance	= £
Minimum Payment	£

The Minimum Payment each month will be the greater of:
 (i) £5 or the full balance if less.
 (ii) that month's interest, any Default Charges and that month's Instalment Plan fee(s), 1/12th of any annual fee and 1% of the remaining balance (Including any Instalment Plan balance(s) but excluding any annual fee).

Your minimum payment should reach your account by 29 Jul 2022.

Minimum Payment

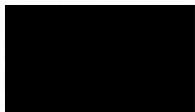
If you make only the minimum payment each month, it will take you longer and cost you more to clear your balance. If you are unable to pay the minimum payment or are in financial difficulty, please contact us on 0345 8354482. For all other enquiries, please call the number on the reverse of your statement.

If you make the minimum payment of £68.90 and it reaches us on the due date of 29 July 2022 your estimated interest payment next month is £30.83. Please refer overleaf for further details.



bank giro credit

Paid in by _____
 Date _____



Total Cash		
Cheques etc		

73 **£** _____
 Transaction code

Fee	Items
-----	-------

Please do not write or mark below this line



WilliamsLea 02077724200



GOV.UK

View a job applicant's right to work

Right to Work status

[Redacted]
They can work in the UK until 3 October 2024.

Details

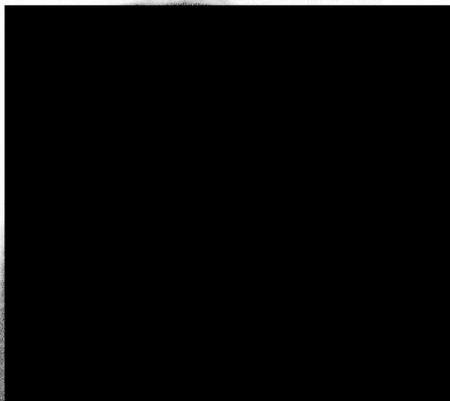
They can work in any job.

You must check their right to work again on 3 October 2024.

▼ Legal basis of status

This leave is issued in accordance with the EU exit separation agreements.

For EU citizens, and the family members of EU citizens or of UK citizens, this is the Withdrawal Agreement. For EEA European Free Trade Association (EFTA) citizens, and the family members of EEA EFTA citizens, this is the EEA EFTA Separation Agreement. For Swiss citizens, and the family members of Swiss citizens, this is the Swiss Citizens' Rights Agreement.



If you employ this person

From: manpal singh [REDACTED]
Sent: Wednesday, October 5, 2022 2:52 PM
To: Luke Elford <[REDACTED]>
Subject: Re: Nags Head, 17-19 Whitechapel Road, London

Luke

Maya docs attache.

Manu
Manpal Singh Clair



Performer Information

Performers "stage" name: Maya

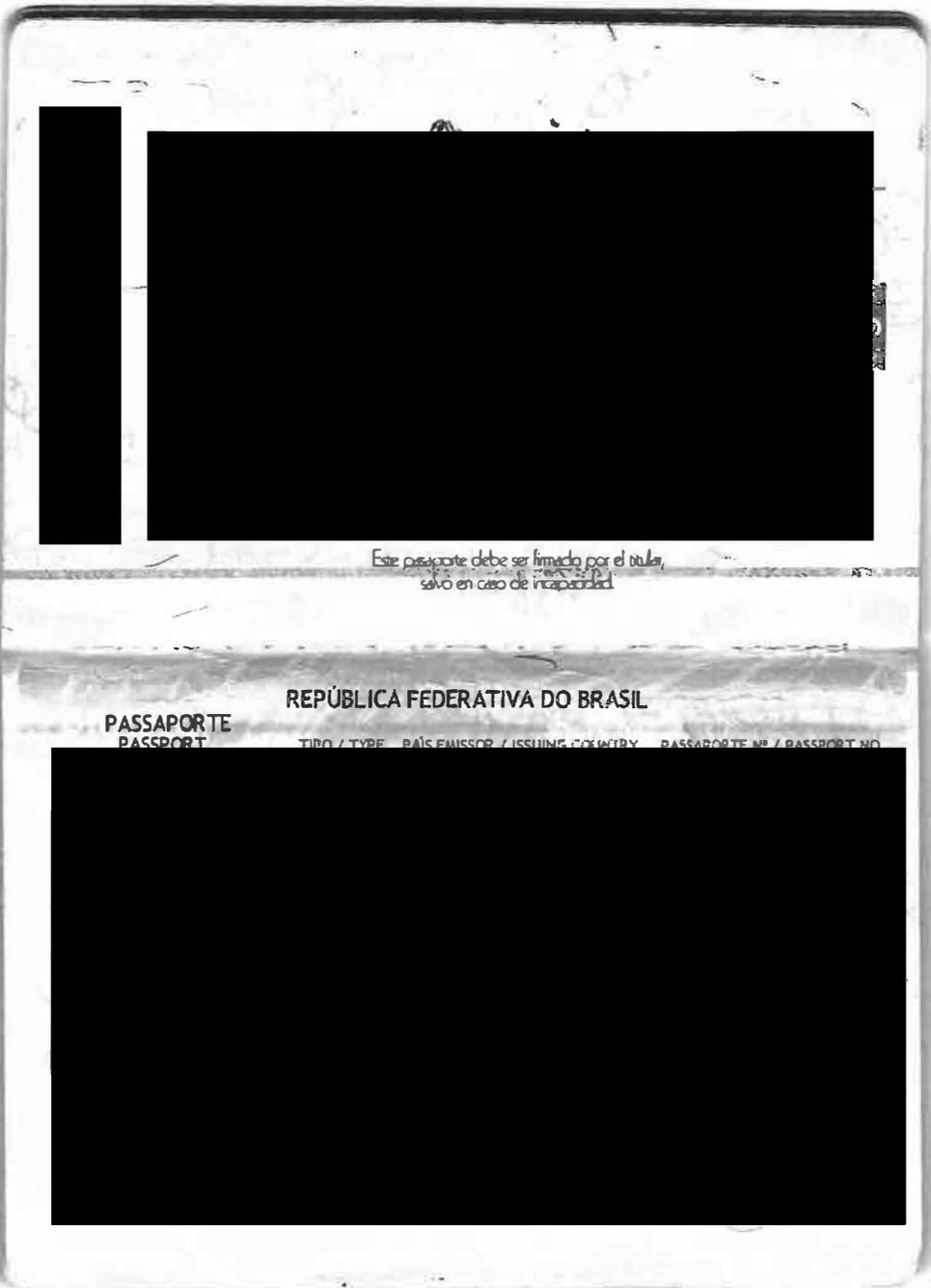
Performers Full Name: [REDACTED]

Date of Birth: [REDACTED]

Address: [REDACTED]

Date: 02/08/2022

Review date: 01/08/2023



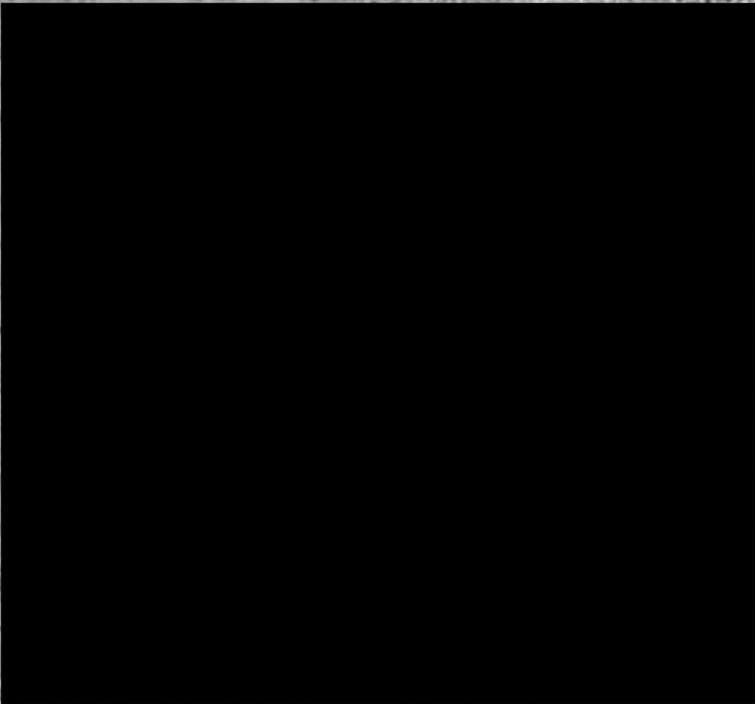
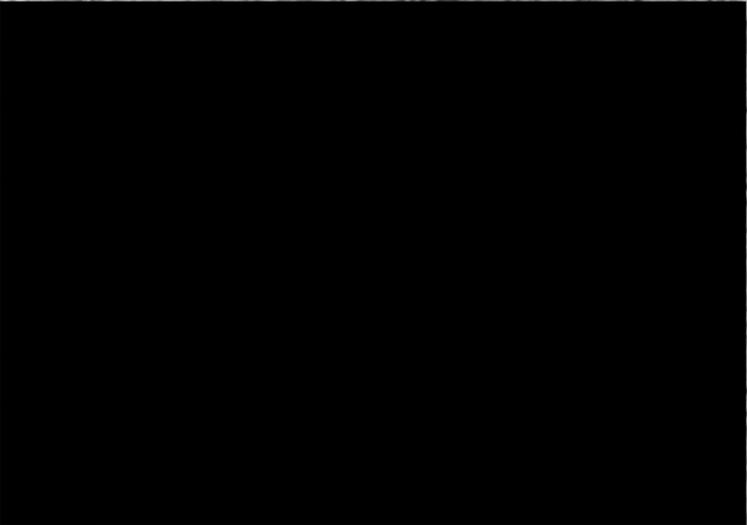
Este pasaporte debe ser firmado por el titular,
salvo en caso de incapacidad

PASSAPORTE
PASSPORT

REPÚBLICA FEDERATIVA DO BRASIL

TIPO / TYPE PAÍS EMISOR / ISSUING COUNTRY PASSAPORTE Nº / PASSPORT NO.

RESIDENCE PERMIT





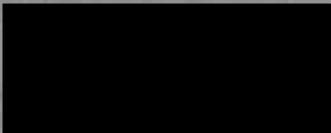
Council Tax Bill 2022/23

Please quote this account number whenever you contact us: [REDACTED]

Date of Issue

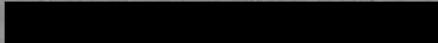
16 Mar 2022

If you are having financial difficulties due to Covid 19 please visit our website for information and help.



9826 9272 1100 0006 4008 6676

ADDRESS OF PROPERTY LIABLE FOR CHARGE



Your property has been valued in **Band C**

The full amount due for this year is:

Comprising Enfield Council

Greater London Authority

Adult Social Care

£1,637.08

£1,130.40

£351.64

£155.04

Increase in council tax to fund Adult Social Care

The council tax attributable to Enfield Council includes a 2% precept to fund adult social care. For further information about the adult social care precept please visit www.enfield.gov.uk

REASON FOR THIS BILL New Year Billing

STATEMENT OF ACCOUNT

Charge due for period	01/04/2022	31/03/2023	£1,637.08
Single Person Discount	25.00%		£409.27 CR

Total Amount Due

£1,227.81



From: Luke Elford
Sent: Wednesday, October 5, 2022 3:53 PM
To: Mohshin Ali <[REDACTED]>
Subject: NH License Ltd - The Nags Head - Performer Information (PATRICIA)

Dear Mohshin,

Good to see you yesterday.

Further to your letter of 9 September 2022 and your email of 3 October 2022 (timed 13:48) please find attached performer information for Patricia ([REDACTED])
[REDACTED]

I have provided the documents unredacted. Please would you ensure that the documents are not shared any more widely than they need to be for the purposes you have requested them, or that if they are, they are suitably redacted before that is done.

Thanks.

Kind Regards

Luke Elford
Partner

LElford@[REDACTED] | www.john-gaunt.co.uk
T: [REDACTED] **F:** 0114 267 9613



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From: Luke Elford
Sent: Friday, October 7, 2022 3:51 PM
To: Mohshin Ali <[REDACTED]>
Subject: RE: NH License Ltd - The Nags Head - Performer Information (PATRICIA)

Dear Mohshin,

Whilst I await answers to my queries below, please find attached information for Maya as requested.

Kind Regards

Luke Elford
Partner

LElford [REDACTED] www.john-gaunt.co.uk
T: [REDACTED] **F:** 0114 267 9613



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From: Luke Elford <[REDACTED]>
Sent: 06 October 2022 13:47
To: Mohshin Ali <[REDACTED]>
Subject: Re: NH License Ltd - The Nags Head - Performer Information (PATRICIA)

Dear Mohshin,

Sorry, I thought you'd said you didn't want those because the undercover officer had recorded the performer's name as "Mia."

Did the officers do multiple visits to several venues in one night? I know there were serious issues last time around with the undercover officers mixing up one venue with another. Perhaps that has happened again?

In any event, leave this with me and I will send across same for Maya.

Kind regards,
Luke Elford

Partner
LElford [REDACTED]
www.john-gaunt.co.uk
T: [REDACTED]
M: [REDACTED]

Sent from my mobile. Please excuse typos.

From: Luke Elford
Sent: Tuesday, October 11, 2022 1:43 PM
To: Mohshin Ali <[REDACTED]>
Subject: NH License Ltd - The Nags Head - CCTV footage

Dear Mohshin,

Have you had a chance to review the CCTV footage that I dropped into you on the 4th of October?

I have been having another look at the footage and wondered whether, performers notwithstanding, you might want to have a chat about how one of the undercover officers has conducted himself during the visit? A few red flags...

I can put them in writing if you like, but perhaps better discussed in person in the first instance?

Kind Regards

Luke Elford
Partner

LElford@[REDACTED] | www.john-gaunt.co.uk

T: [REDACTED]



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For more details on our services please click on the links above.

From: Mohshin Ali <[REDACTED]>
Sent: 14 October 2022 14:51
To: Luke Elford <[REDACTED]>
Subject: RE: NH License Ltd - The Nags Head - CCTV footage

Dear Luke,

Thank you for your email.

The Licensing Authority has not viewed the CCTV footage yet and is hoping to do these next week.

We will contact you/your client in due course.

Kind regards,

Mohshin Ali
Senior Licensing Officer
Licensing and Safety Team
Environmental Health & Trading Standards
Place Directorate
Mulberry Place
5 Clove Crescent
London E14 2BG

[REDACTED] [REDACTED]
www.towerhamlets.gov.uk  licensing@towerhamlets.gov.uk

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From: Luke Elford <[REDACTED]>
Sent: 11 October 2022 13:43
To: Mohshin Ali <[REDACTED]>
Subject: NH License Ltd - The Nags Head - CCTV footage

Dear Mohshin,

Have you had a chance to review the CCTV footage that I dropped into you on the 4th of October?

I have been having another look at the footage and wondered whether, performers notwithstanding, you might want to have a chat about how one of the undercover officers has conducted himself during the visit? A few red flags...

I can put them in writing if you like, but perhaps better discussed in person in the first instance?

Kind Regards

Luke Elford
Partner

LElford [REDACTED] | www.john-gaunt.co.uk
T: [REDACTED] F: 0114 267 9613



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Partners: Tim Shield (569713) | Michelle Hazlewood (569714)
Christopher Grunert | Jon Wallsgrave | Patrick Robson | Luke Elford
Practice Manager: Jonathan Pupius

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From: Mohshin Ali <[REDACTED]>
Sent: Friday, October 21, 2022 5:53:34 PM
To: Luke Elford <[REDACTED]>
Subject: Nags Head, 17-19 Whitechapel Road, London

Dear Luke,

By way of update, the Licensing Authority going through the process of viewing all of the CCTV footage as part of the investigation. We will contact you/your client in due course.

Kind regards,

Mohshin Ali
Senior Licensing Officer
Licensing and Safety Team
Environmental Health & Trading Standards
Place Directorate
Mulberry Place
5 Clove Crescent
London E14 2BG

[REDACTED]
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From: Mohshin Ali [REDACTED]
Sent: Thursday, December 15, 2022 12:27:01 PM
To: Luke Elford <[REDACTED]>
Subject: Nags Head, 17-19 Whitechapel Road, London

Dear Sir/Madam,

**Local Governmental (Miscellaneous Provisions) Act 1982 as amended by the Policing and
Crime Act 2009**

Re: Nags Head, "Nags Head Public House", 17-19 Whitechapel Road, London

Please see the attached. The hard copy is in the post.

Kind regards,

Mohshin Ali
Senior Licensing Officer
Licensing and Safety Team
Environmental Health & Trading Standards
Place Directorate
Mulberry Place
5 Clove Crescent
London E14 2BG

[REDACTED]
www.towerhamlets.gov.uk  licensing@towerhamlets.gov.uk

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Place Directorate

Environmental Health and Trading Standards

Head of Service: **David Tolley**

2nd Floor, Mulberry Place
5 Clove Crescent
London E14 2BG

Tel: **020 7364 5498**

Enquiries to: **Mohshin Ali**

Email: [REDACTED]

www.towerhamlets.gov.uk

NH License Ltd
Kemp House
160 City Road
London
EC1v 2NX

15th December 2022

Your ref:
Our ref: PSU:010281

Dear Sir/Madam,

Local Governmental (Miscellaneous Provisions) Act 1982 as amended by the Policing and Crime Act 2009

Re: Nags Head, "Nags Head Public House", 17-19 Whitechapel Road, London

The Licensing Authority has viewed the CCTV footage you have submitted for the 18th August 2022. At this stage we have not completed a chronology of breaches seen in this footage, though we noted a number of them during the viewing on the footage, mainly intentional touching between customer and performer during a dance (performance).

We have noted the comments from your solicitor in the email dated 16th September 2022 and we acknowledge the Performers involved were suspended due to the breaches of the conditions that were identified in this CCTV.

The Licensing Authority has decided not to initiate a prosecution for this offence, however, should any breaches be found in the future, we reserve the right to bring this breach back into action. In the meantime, you are reminded of your duty to maintain the conditions of your licence and including the *standard conditions for sexual entertainment venues (revised 23rd June, 2015)*.



This letter is being sent to the company as the licence holder and also copied to the director of the company (also copied to your solicitor).

Yours sincerely,



Mohshin Ali
Senior Licensing Officer

Cc:

- Manpal Singh Clair, 128 Cit Road, London, United Kingdom, EC1V 2NX
- Luke Elford, Solicitor ()



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Tower Hamlets Council
Town Hall
Mulberry Place
5 Clove Crescent
E14 2BG

From: Mohshin Ali [REDACTED]
Sent: Friday, February 24, 2023 5:20 PM
To: Luke Elford <[REDACTED]>
Subject: Nags Head, 17-19 Whitechapel Road, London

Dear Sir/Madam,

**Local Governmental (Miscellaneous Provisions) Act 1982 as amended by the Policing and
Crime Act 2009**

The Nags Head, 17-19 Whitechapel Road, London

Please see the attached. The hard copy will be in the post.

Kind regards,

Mohshin Ali
Senior Licensing Officer
Licensing and Safety Team
Environmental Health & Trading Standards
Place Directorate
Mulberry Place
5 Clove Crescent
London E14 2BG

[REDACTED]
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Place Directorate

Environmental Health and Trading Standards

Head of Service: **David Tolley**

Environmental Health & Trading Standards
Licensing & Safety Team
4th Floor, Tower Hamlets Town Hall
160 Whitechapel Road
London E1 1BJ

NH License Ltd
Kemp House
160 City Road
London
EC1v 2NX

24th February 2023

Your ref:
Our ref: PSU:010281

Tel: [REDACTED]
Enquiries to: **Mohshin Ali**
Email: [REDACTED]

www.towerhamlets.gov.uk

Dear Sir/Madam,

Local Governmental (Miscellaneous Provisions) Act 1982 as amended by the Policing and Crime Act 2009

Re: Nags Head, "Nags Head Public House", 17-19 Whitechapel Road, London

I write to you following my letter dated 15th December 2022 regarding the above premises.

As you are aware, the Licensing Authority has decided not to initiate a prosecution for the breaches of the SEV licence which occurred on the 18th August 2022 where intentional touching between customer and performer during a dance (performance).

We have noted the performers involved were suspended due to the breaches of the conditions that were identified as a result of the test purchase. Considering the breaches that were highlighted by the test purchasers and your client's CCTV footage, the Licensing Authority acting as a Responsible Authority has decided it's appropriate to request that the Appropriate Authority consider revoking the Sexual Entertainment Venue Licence.

This letter is being sent to the company as the licence holder and also copied to the director of the company (also copied to your solicitor).

Yours sincerely,

[REDACTED]

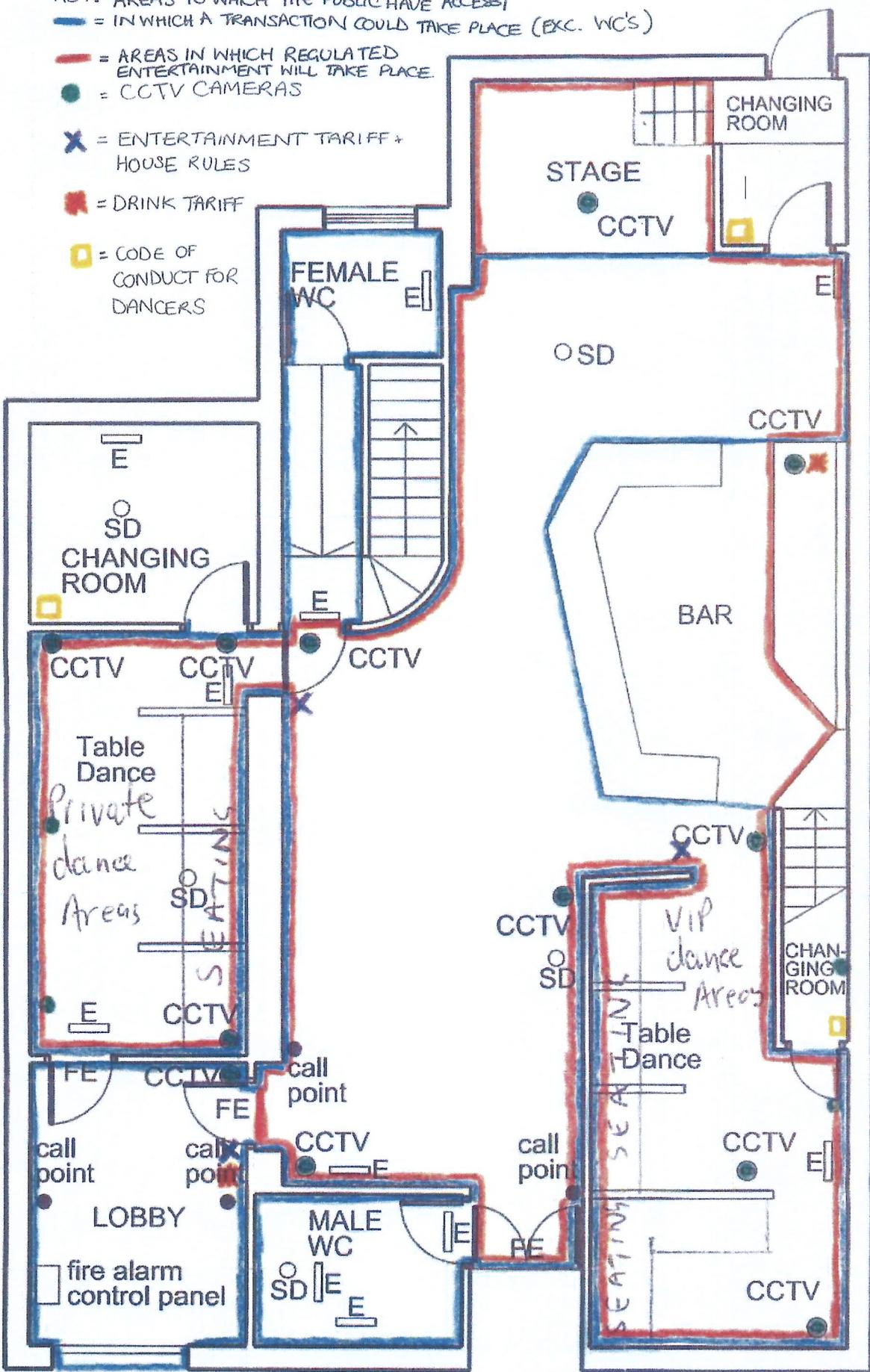
Mohshin Ali
Senior Licensing Officer

Cc:

- NH License Ltd, Kemp House, 160 City Road, London EC1v 2NX
- Manpal Singh Clair, 128 Cit Road, London, United Kingdom, EC1V 2NX
- Luke Elford, Solicitor [REDACTED]

THE NAGS HEAD GENTLEMAN'S VENUE

- KEY: AREAS TO WHICH THE PUBLIC HAVE ACCESS/
 — = IN WHICH A TRANSACTION COULD TAKE PLACE (EXC. WC'S)
 — = AREAS IN WHICH REGULATED ENTERTAINMENT WILL TAKE PLACE
 ● = CCTV CAMERAS
 X = ENTERTAINMENT TARIFF + HOUSE RULES
 ■ = DRINK TARIFF
 □ = CODE OF CONDUCT FOR DANCERS



ENTRANCE