

## **Advisory Note**

**Some of the imagery in the following supporting documentation may be of an explicit nature and the links to video clips from webpages may also contain explicit content.**

In the matter of Birmingham City Council  
And in the matter of Schedule 3 of the Local Government (Miscellaneous Provisions) Act  
1982: Sex Establishments

Re: La Belle's, 61, Newhall Street, B3 3RB

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Outline Submissions

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**Preliminary Matters:** Late Representations [tbc]

See: *Miss Behavin' Ltd v Belfast City Council* [2007] UKHL 19 per Lord Hoffman [8] and Lord  
Nueberger [71] (Paterson's Licensing Acts 2019, 1057).

**Outline Submissions:**

[1] Nature of the Sexual Entertainment applied for.  
View video clips from the webpages of Cyclone and Scralets.

[2] Equality Act 2010 and the Public Sector Equality Duty (s 149)

See: *Bracking v Secretary of State for Work and Pensions* [2013] EWCA 1345, paragraphs  
[26]&[27]; and *Regina (Core Issues Trust) v Transport for London* [2013] EWHC 651 (Admin).

[3] Suitability of the Applicant

[4] The premises for which the licence is being applied.

[5] Use of other premises in the vicinity.

[6] Relevant locality and character of the relevant locality.

[7] Number of sex establishments in the relevant locality.

For [3] – [7] see: *R (on the application of Thompson) v Oxford City Council* [2013] 3 EGLR 21,  
paragraph 50.

Leo Charalambides  
Kings Chambers  
Birmingham  
17<sup>th</sup> April, 2019

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**From:** Jonathan Bryce  
**Sent:** 17 April 2019 12:21  
**To:** Emma Rohomon; Licensing  
**Cc:** Gary Cardin; Leo Charalambides; SClover@kingschambers.com  
**Subject:** Re: Media Submissions for tomorrow's hearing

Dear all,

My apologies, I missed off some additional images from my last email. Please see attached!



Enter Search...

## Events @ Cyclone

Whatever your event, we want to make it an event to remember. Any occasion can be a party and here's a few of the events that we've had before.

### Corporate Lunches

Are you tired of the same old corporate lunch meetings? Well, why not let The Cyclone Club help you make it more of a pleasure than a chore!

You can hire The Cyclone Club any day between 12pm and 5pm for your exclusive lunchtime event, with various menu options to choose from and the Cyclone girls to help you entertain clients and colleagues, the Cyclone Club will ensure you have the ultimate lunch time experience.

For further information on how we can assist you with making your event perfect within the exclusive surroundings of The Cyclone Club, please **Contact Us**.

### Girlie Pole Parties

From hen nights to birthday parties and even divorce parties, whatever you're celebrating a Cyclone pole-party is a fantastic way to let your hair down and have loads of fun with the girls.

Private and exclusive, the Cyclone's party package allows you to relax with a glass of wine, learn a dance routine with eye-catching spins, tricks and sexy moves; spend some quality time together and kickback with a fantastic and fun experience.

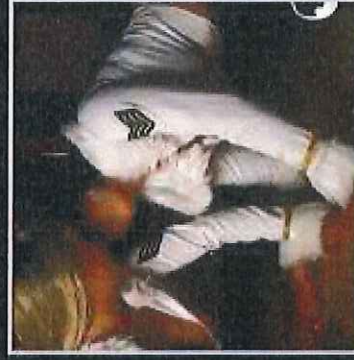
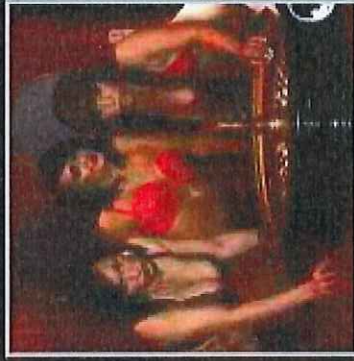
So, whether you're looking for an afternoon activity or something to kick-start your evening, our parties are sure to get your pulse racing and, don't worry, there is no stripping involved! For further information on how we can assist you with making your event perfect within the exclusive surroundings of The Cyclone Club, please **Contact Us**.

### Pole Dancing Lessons





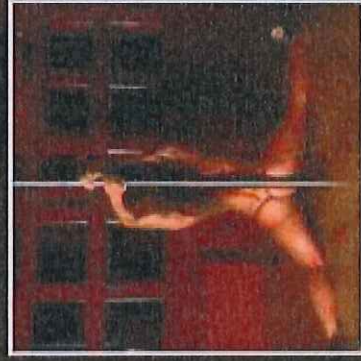
# Scarlets Gentlemans Club



## Welcome to Scarlets, the UK's hottest new Gentleman's Club.

Nestled in the bustling heart of Birmingham's city centre, Scarlets is an exclusive and truly unique venue for the elite gentleman. With the look and ambience of a traditional 17th Century ol' boy's parlour, you can sit back in Victorian splendour, relax and enjoy a drink in the company of one or more of our many, flirtatious and seductive dancers.

The main bar area boasts a large stage with two poles so you can enjoy double the pleasure. With spacious booths and seating areas you can enjoy topless and fully nude dances, whilst private dances are available in one of our exclusive VIP rooms.





## Stag Parties

With pole-dancing, lap dancing and private dances available. Scarlet's stag packages are second to none.

On your stag night you and your friends will be given the VIP treatment as you enjoy the relaxed and friendly atmosphere at Scarlets, sample our range of Champagnes, wines, beers and spirits, settle into one of our luxurious bars and spend time with our stunning girls.

With all this and more on offer we know that you'll enjoy your evening at Scarlets!

Come along for an advance taste of all that's on offer or contact us now for the best offers available, either way our glamorous girls are on hand to help you make your stag night the ultimate lads night out!

For more information on our stag parties please **Contact Us**.

### Contact Us

Name \*

Email \*

Message \*

### Site Navigation

#### Our Location

Scarlets Gentlemans Club  
34 Horse Fair  
City Centre  
Birmingham  
B1 1DA

t. 0121 622 4869  
e. [info@scarletsclub.co.uk](mailto:info@scarletsclub.co.uk)

#### About Us

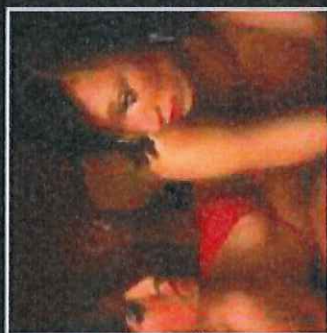
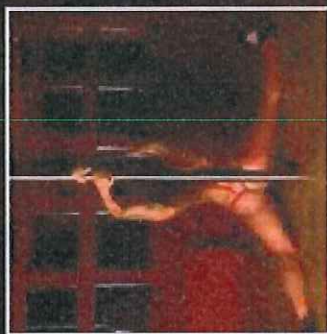
Nestled in the bustling heart of Birmingham's city centre, Scarlets is an exclusive and truly unique venue for the elite gentleman.

With spacious booths and seating areas you can enjoy topless and fully nude dances, whilst private



# Dancers Wanted

We are currently recruiting. Please use our **Contact Form** to request more details.



Jonathan Bryce  
Operations Manager  
Colmore Business District

If you would like to join the Colmore BID mailing list, please let me know.

1st Floor, Waterloo House  
Waterloo Street  
Birmingham  
B2 5TB



On 17 Apr 2019, at 12:05, Jonathan Bryce

> wrote:

Hi Emma,

Please also see below a set of links that we would like to play at tomorrow's hearing:

<https://www.youtube.com/watch?v=TzwwSzOOfy8>

<https://www.youtube.com/watch?v=X-AZUt0vHs0>

<http://cycloneclub.co.uk/video/>

We discussed earlier how you might have some issues with AV equipment tomorrow. I will have my laptop and mobile with me so if you are unable to provide IT and internet on which to play these, I can assist. As discussed, Colmore BID also has access to a PAT tested projector which we can bring with us if required; please just let me know.

Many Thanks

Jonathan Bryce  
Operations Manager  
Colmore Business District

If you would like to join the Colmore BID mailing list, please let me know.

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B2 5TB

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