

BIRMINGHAM CITY COUNCIL

LICENSING AND PUBLIC PROTECTION COMMITTEE

TUESDAY, 09 APRIL 2019 AT 10:00 HOURS
IN COMMITTEE ROOMS 3 & 4, COUNCIL HOUSE, VICTORIA
SQUARE, BIRMINGHAM, B1 1BB

A G E N D A

1 NOTICE OF RECORDING/WEBCAST

The Chairman to advise/meeting to note that this meeting will be webcast for live or subsequent broadcast via the Council's Internet site (www.civico.net/birmingham) and that members of the press/public may record and take photographs except where there are confidential or exempt items.

2 DECLARATIONS OF INTERESTS

Members are reminded that they must declare all relevant pecuniary and non pecuniary interests arising from any business to be discussed at this meeting. If a disclosable pecuniary interest is declared a Member must not speak or take part in that agenda item. Any declarations will be recorded in the minutes of the meeting.

3 APOLOGIES

To receive any apologies.

3 - 384

4 CONTROL OF SEX ESTABLISHMENTS - SEXUAL ENTERTAINMENT VENUE,

Report of the Director of Regulation and Enforcement.
N.B. Application scheduled to be heard at 10:00am

5 OTHER URGENT BUSINESS

To consider any items of business by reason of special circumstances (to be specified) that in the opinion of the Chairman are matters of urgency.

6 AUTHORITY TO CHAIRMAN AND OFFICERS

Chairman to move:-

'In an urgent situation between meetings, the Chairman jointly with the relevant Chief Officer has authority to act on behalf of the Committee'.

BIRMINGHAM CITY COUNCIL**REPORT OF THE DIRECTOR OF REGULATION AND ENFORCEMENT
TO THE LICENSING AND PUBLIC PROTECTION COMMITTEE****TUESDAY 9 APRIL 2019
LADYWOOD****CONTROL OF SEX ESTABLISHMENTS - SEXUAL ENTERTAINMENT VENUE,
PARADISE CITY, 193 – 194 BROAD STREET, BIRMINGHAM B15 1AY****1. Summary**

- 1.1 Birmingham City Council's Sexual Entertainment Venue Policy became effective from 1st November 2014.
- 1.2 An application has been received for the grant of a Sexual Entertainment Venue (SEV) Licence from Parma (Midlands) Limited in respect of premises to be known as Paradise City, 193 – 194 Broad Street, Birmingham B15 1AY.
- 1.3 At the time of writing this report there are 7 SEV licences granted to premises within Birmingham 6 of which are granted to other venues located within the area bounded by the ring road (A4540).
- 1.4 If having considered the application and objections received the Committee resolve to grant an SEV licence in respect of Paradise City, 193 – 194 Broad Street, Birmingham B15 1AY then there would be 7 SEV licences in force within the area bounded by the ring road (A4540).
- 1.5 As stated in Birmingham City Council's SEV Policy the Council considers that the part of the City which falls within the ring road (A4540) is an area which is appropriate to have an upper limit guide on the number of SEV's the appropriate upper limit being eight.

2. Recommendation

- 2.1 That Committee consider and determine the application for the grant of a Sexual Entertainment Venue licence in respect of Paradise City, 193 – 194 Broad Street, Birmingham B15 1AY having considered the objections received and having regard to the options contained in paragraph 6.1 of the report.

Contact Officer: Emma Rohomon, Acting Head of Licensing

Telephone: 0121 303 9780

E-mail: emma.rohomon@birmingham.gov.uk

Originating Officer: David Kennedy, Principal Licensing Officer

3. Background

- 3.1 An application has been received from Parma (Midlands) Limited for the grant of a Sexual Entertainment Venue Licence in respect of the premises to be known as Paradise City, 193 – 194 Broad Street, Birmingham B15 1AY. A copy of the application is attached at Appendix 1.
- 3.2 The applicant has submitted a photograph showing the proposed external scheme of the premises. A copy of which is attached at Appendix 2.
- 3.3 The proposed hours of operation being 24 hours a day Monday to Sunday.
- 3.4 The nature of the entertainment as described on the application form is lap dancing, pole dancing, table dancing, strip shows, erotic & exotic dancing, burlesque dancing. The applicant has confirmed the relevant entertainment will involve semi and full nudity.
- 3.5 The applicant has submitted a copy of Paradise City's proposed Etiquette & Club House Rules. A copy of which is attached at Appendix 3.
- 3.6 A plan of the premises detailing where the Sexual Entertainment will take place is also part of the application procedure. A copy of which is attached at Appendix 4.
- 3.7 The applicant has also submitted additional documents in support of the application, which whilst not included in the body of this report due to the size. The documents will be published as an additional document entitled "Applicants Supporting Evidence Bundle."

4. Consultation

- 4.1 The applicant was required to advertise the application in a local newspaper, post a notice outside of the premises for a period of 21 days and serve a copy of the application to the Chief Officer of Police.
- 4.2 In addition upon receipt of an application the Licensing Section consults with the West Midlands Police and the Licensing Enforcement Teams and also notifies the appropriate Ward Councillors.
- 4.3 West Midlands Police have lodged an objection to the grant of a licence. A copy of which is attached at Appendix 5.
- 4.4 Licensing Enforcement have lodged an objection to the grant of a licence. A copy of which is attached at Appendix 6.
- 4.5 Westside Business Improvement District (BiD) have lodged an objection to the grant of a licence. A copy of which is attached at Appendix 7.
- 4.6 A copy of the Council approved standard conditions for Sexual Entertainment Venue licences are contained within the current Sexual Entertainment Venue policy a copy of which is attached at Appendix 8.

- 4.7 Location plans, including a plan showing the proximity of the other existing licensed Sexual Entertainment Venues to the premises, are attached as Appendix 9.
- 4.8 The applicant and representatives of West Midlands Police, Licensing Enforcement Team and Westside BiD have been invited to attend the hearing in order to respond to any questions members may have.

5. Matters for Consideration

- 5.1 When considering an application for the grant of a licence, the Committee should have regard to any observations submitted to it by the Chief Officer of Police and any objections that the Licensing Authority has received from anyone else within 28 days of the date of the application.
- 5.2 Subject to any new information produced at the hearing it does not appear that any of the mandatory grounds of refusal apply to the application currently due for consideration. For example, a licence shall not be granted to a person who is under the age of 18 or who has had a previous application for the same premises refused within the last 12 months.
- 5.3 The only discretionary grounds upon which the Council may refuse an application are those grounds specified in Schedule 3 paragraph 12(3) of the Local Government (Miscellaneous Provisions) Act 1982 as amended:
- a) that the applicant is unsuitable to hold the licence by reason of having been convicted of an offence or any other reason;
 - b) that if the licence were to be granted, renewed or transferred the business to which it relates would be managed by, or carried on for the benefit of a person, other than the applicant, who would be refused the grant of such a licence if he made the application himself;
 - c) that the number of sex establishments, or of sex establishments of a particular kind, in the relevant locality at the time the application is made is equal to or exceeds the number which the authority consider is appropriate for that locality;
 - d) that the grant or renewal of the licence would be inappropriate, having regard:
 - (i) to the character of the relevant locality; or
 - (ii) to the use to which any premises in the vicinity are put; or
 - (iii) to the layout, character or condition of the premises, vehicle, vessel or stall in respect of which the application is made.

6. Options Available

6.1 The Committee may:

6.1.1 Grant the application as it stands in which case the licence will be renewed subject to the Council approved Standard Conditions.

6.1.2 Grant the application as it stands subject to the Council approved Standard Conditions unless they have been expressly excluded or varied and/or other Specific Conditions or restrictions that the Committee deem reasonable, necessary proportionate and justifiable.

6.1.3 Refuse the application on one or more of the grounds as outlined in paragraph 5.3 above.

7. Right of Appeal

7.1 An applicant has a right of appeal to the Magistrates Court against decisions to refuse to grant, renew, vary or transfer a licence, the imposition of conditions or the revocation of an existing licence.

7.2 It should be noted that although no right of appeal lies against a decision made on the discretionary grounds set out in paragraphs 5.3(c & d) above, the applicant could challenge a refusal on the aforementioned grounds by way of a judicial review.

8. Implications for Resources

8.1 At the time of the application being submitted a fee of £6,864 was payable for the grant of a Sexual Entertainment Venue licence, if the application is subsequently refused then 50% of the fee will be refundable.

8.2 In the event of an appeal hearing, the Magistrates power to award costs derives from Section 64 of the Magistrates Courts Act 1980 which entitles them to make such order as they think just and reasonable.

9. Implications for Policy Priorities

9.1 The application that is the subject of this report should be considered in accordance with the published Birmingham City Council Sexual Entertainment Venue Policy.

10. Public Sector Equality Duty

10.1 No specific implications have been identified.

DIRECTOR OF REGULATION AND ENFORCEMENT

Background Papers: Nil

SEX ENT 1.5

Fair Processing Statement – Any personal data held by Birmingham City Council in relation to your application for a Licence to use a premises, vehicle, vessel or stall as a Sexual Entertainment Venue, will be held in full compliance with the legal obligations as set out in the Data Protection Act 1998. This is in accordance with the Council's Privacy Policy; a copy is available on the Council's website: www.birmingham.gov.uk/privacy. To protect the public fund we may also use the information you have provided on this form to prevent and detect fraud. We may share this information for the same purposes with other Council Departments and organisations for example, other councils and the police.

BIRMINGHAM CITY COUNCIL

SCHEDULE 3 OF THE LOCAL GOVERNMENT (MISCELLANEOUS PROVISIONS) ACT 1982

**Application for a Licence to use any Premises, Vehicle, Vessel or Stall as a
Sexual Entertainment Venue**

All questions must be answered, save where otherwise stated. If relevant questions are not answered, the application will be deemed incomplete and will be returned to the applicant.

Section 1**Application details:**

Is this licence for the: Grant ☒ Renewal ☐ Transfer ☐

Is the application made by: an individual ☐ a partnership or other unincorporated body ☐
a company or other corporate body ☒

Section 2***Answer only if Applicant is an individual***

What is the full name of the individual?.....

Permanent Residential Address.....

Any former names

Date of Birth Place of Birth.....

Date Became Resident in the UK..... or E.U Member State

National Insurance Number or E.U Member State Equivalent.

Telephone Number (during normal office hours)

Email Address:.....

Name and address to which correspondence to be sent (if different from above)

Has the applicant a financial interest in the business which is the subject of this application?

Yes ☐ No ☐ If "yes" to what extent

Is the whole business owned by the applicant?

Yes ☐ No ☐

BCC REGULATION & ENFORCEMENT LICENSING SECTION DATE RECEIVED 23 NOV 2018 REF-NO. <u>91016864-00</u> INITIALS <u>lw</u>

Section 3***Answer only if the Applicant is an unincorporated body or a partnership***Full Name of Applicant
.....

What are the names of the applicant's partners? Please complete the table below:

Name (in full): Mr/Mrs/Miss/Other	Date of Birth	Address of permanent residence Throughout six months immediately preceding this application	Date became resident of United Kingdom or other E.U member state

Are there persons responsible for the management of the Applicant other than the partners? If so state their names.
.....
.....
.....Please confirm if the whole of the business is owned by the applicant? Yes ☐ No ☐

Section 4.***Answer only where the applicant is a company or other corporate body***

What is the name of the Applicant?.....PARMA (MIDLANDS) LIMITED.....

Has the Applicant previously been known by any other name and if so what name?
.....

If the Applicant is a company, what type of company is it (e.g., public or private, limited by share or guarantee, etc.)? ...PRIVATE LIMITED COMPANY

What is the registered number of the Applicant?..... 11164703.....

What is the registered office address?

In which country is the company incorporated? UK.....

What is the date of incorporation of the company? 23rd JANUARY 2018.....

Please complete the table in respect of each of the Directors, the Company Secretary or other persons responsible for the management of the body.

Name (in full): Mr/Mrs/Miss/Other	Date of Birth	Address of permanent residence throughout six months immediately preceding this application	Date became resident of United Kingdom or other E.U member State
MR DANIEL PARMA			
MR GARY RAYMOND BROWN			

SEX ENT 1.5

Does the Applicant use any other trading names? If so, please state the trading name(s).
PARADISE CITY

What is the Applicant's trading address?.....
193-194 BROAD STREET, BIRMINGHAM, B15 1AY

Please confirm if the whole of the business is owned by the applicant? Yes ☒ No ☐

Section 5

All Applicants

Please give details of the person (if any) who is to be responsible for the management of the premises in the absence of the licence holder:

First Name.....GARY..... Surname.....BROWN.....

Former Name (if any)

National Insurance Number or E.U Member State Equivalent.....

Permanent Address:

Date of Birth: Place of Birth.....

Has any person named at any place in this application been associated in any way with any other application for a licence for a sex establishment? **Yes X No ☐**

If "yes" give full details

Mr Daniel Parma was involved in management of former Legs 11 premises at Broad Street and Ladywell Walk in Birmingham

Mr Gary Brown was the DJ at the former Legs 11 premises at Ladywell Walk Birmingham

Ms Ruxandra Niculescu was the DPS at the former Legs 11 premises at Ladywell Walk Birmingham

Section 6**Premises details:**

Is this application in respect of: Premises ☒ Vehicle ☐ Vessel ☐ Stall ☐

Is the premises, vehicle, vessel or stall in use for sexual entertainment at the date of this application? Yes ☐ No ☒

If the answer is yes, state the name and address of the person or body currently operating the business.....

What is full address of the premises for which a licence is sought?

193-194 BROAD STREET, BIRMINGHAM, B15 1AY

If the application is in respect of a vehicle, vessel or stall, please state where it is to be used as a sexual entertainment venue.....

Under what name is, or will the premises be known?

PARADISE CITY

Is the whole of the premises to be used under the licence? Yes ☒ No ☐

If no, please state:

a) which part of the premises is to be used for the purposes of the licence

b) the use to which the remainder of the premises are to be put

c) the names of those responsible for the management of the remainder of the premises

If the Applicant's interest in the premises is a leasehold one, please state:

a) Head-lease ☒ Sub-lease ☐

b) the name and address of the landlord and of the superior landlord where applicable

c) the length of the unexpired term ...Expires 12 April 2024..

Section 7.**Proposed operation times and activities**

Give the times it is proposed to operate the Premises for the purpose of this Licence;

<u>Day</u>	<u>Start</u>	<u>Finish</u>	<u>State any seasonal variations or non standard timings where you intend to use the Premises, which are different to those listed in the column on the left.</u>
Monday	00:00	24:00	
Tuesday	00:00	24:00	
Wednesday	00:00	24:00	
Thursday	00:00	24:00	
Friday	00:00	24:00	
Saturday	00:00	24:00	
Sunday	00:00	24:00	

Please give full details of the nature of the relevant entertainment e.g. lap-dancing, pole-dancing, stage strip show etc

LAP DANCING, POLE DANCING, TABLE DANCING, STRIP SHOWS, EROTIC AND EXOTIC DANCING, BURLESQUE DANCING, SEMI AND FULL NUDITY

Please confirm if the relevant entertainment involves full nudity x Yes ☐ No

Section 8.**If the application is for the Transfer of a Premises Licence**

Name of current Premises Licence Holder

Please give the reason/s for the transfer application

Section 9.

Section 9.

Has the Applicant or any persons named in this form been convicted of a criminal offence whether in the UK or elsewhere? Yes ☐ No ☐

If so, please give details of unspent convictions below:

Convictions:

Forenames	Surname	Former Name (if any)	Court	Date	Offence	Penalty or Sentence

Has the Applicant or any persons named in this form been cautioned whether in the UK or elsewhere ? Yes ☐ No ☐

If so, please give details below:

Cautions:

Forenames	Surname	Former Name (if any)	Offence	Date of Caution	Where caution administered

SEX ENT 1.5

Been disqualified from holding a licence for a sex establishment?	No
Been refused the grant / renewal / transfer of a licence for a sex establishment?	No
Been the holder of a sex establishment licence when that licence has been revoked?	No
Been associated in any way with any other application for a sex establishment licence?	Yes
If 'Yes' to any of the above please provide details:	
<p>See generally above</p> <p>Mr Daniel Parma was involved in management of Legs 11 premises in Birmingham at Broad Street and Ladywell Walk</p> <p>Mr Gary Brown was the DJ at the former Legs 11 premises at Ladywell Walk Birmingham</p> <p>Ms Ruxandra Niculescu was the DPS at the former Legs 11 premises at Ladywell Walk Birmingham</p>	

Is there any information in this application which you would **not** wish to be seen by members of the public?

Yes x No ☐

If yes, state which information and the reasons why you would **not** wish it to be seen

Home addresses of those involved in management of the premises

.....

.....

.....

Is there any further information which the Applicant would wish the Council to take into account when considering this application?

See generally accompanying summary and documentation including management structure

Condition 33. Locks are removed from all dance areas, but the applicants wish to be able to lock the VIP Lounge (as shown on second floor on the plan supplied herewith) at all times when the Room is not in use. It would be unlocked when it is in use. This is because the room contains a bar area which would otherwise need supervising at all times if the room has to be left unlocked

.....

(If necessary, please continue on a separate sheet)

SEX ENT 1.5

Please read the checklist below and tick to confirm you have enclosed all of the required information/documents;

I have made or enclosed payment of the fee ☒

Please check the following link for details of the cost of your application:-

<http://www.birmingham.gov.uk/licensingfeesandcharges>

I have enclosed a plan showing the interior layout of the premises and where relevant entertainment will take place for consideration by the Licensing Authority ☒

I have enclosed a copy of the "club rules". Such club rules must contain the required conduct of performers which shall include for example, no sex acts, no giving or taking phone numbers (including exchange of business cards). ☒

I have enclosed a scheme showing the exterior design for consideration by the Licensing Authority ☒

I understand and agree that I must send a copy of my completed application to the Chief Officer of Police no later than seven days after the date of the application. I also understand that I must produce evidence of due service of the Notice of Application upon the Chief Officer of Police as required by paragraph 10(14) of the Third Schedule of the Local Government (Miscellaneous Provisions) Act 1982. ☒

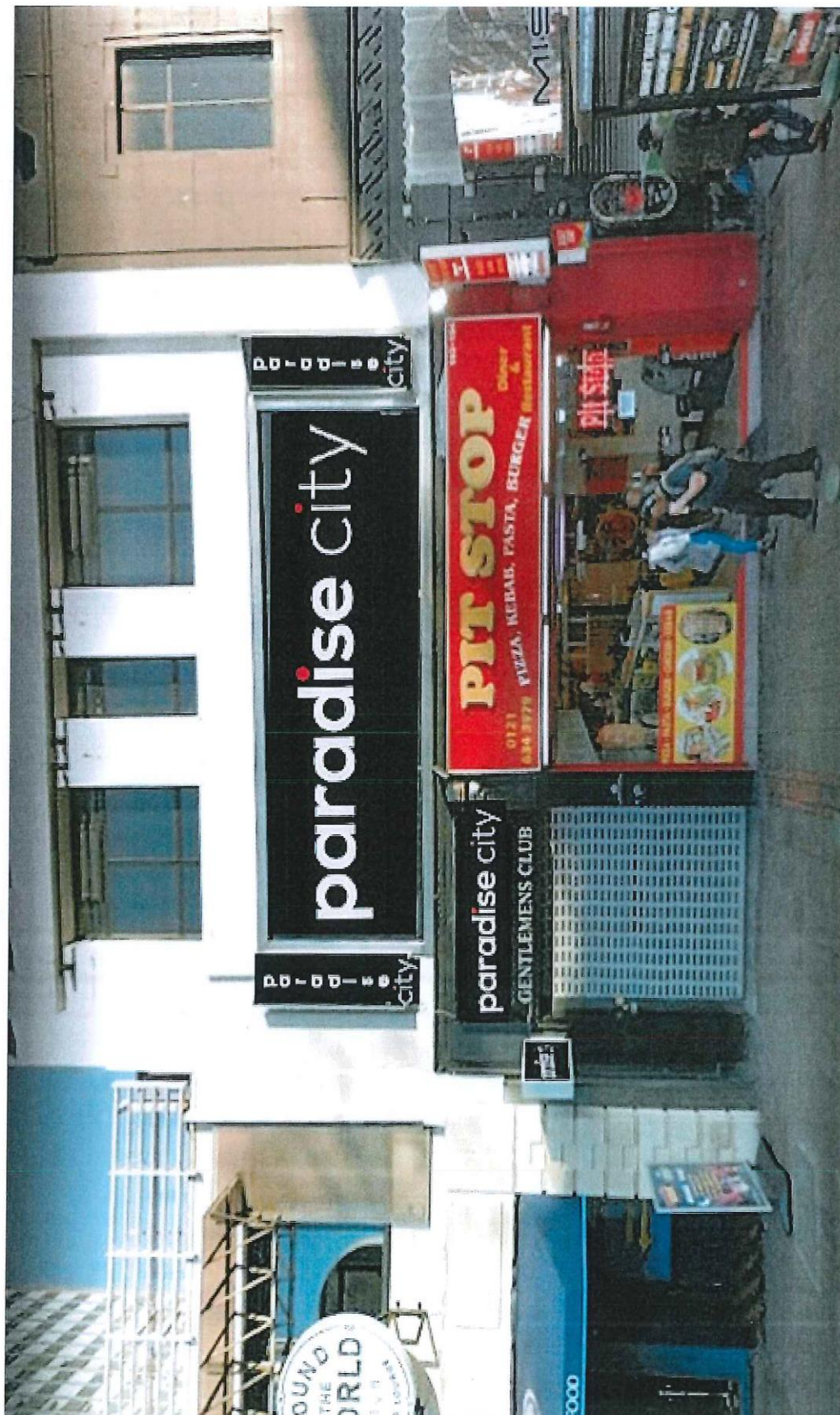
I understand that I must now advertise my application on or near the Premises for 21 days starting with the date of the application. ☒

I understand that I must advertise the application in a local newspaper within seven days after the date of the application and that a copy of the notice of application which has been published must be given to the Licensing Authority in accordance with paragraph 10 (8) of the Third Schedule of the Local Government (Miscellaneous Provisions) Act 1982. ☒

DECLARATION: I declare that the details in this application are true to the best of my knowledge and belief and acknowledge that if there are any omissions or incorrect statements of a serious nature this may result in the application being refused. I further declare that I have read and agree to abide by the conditions of Licence for a Sexual Entertainment Venue made by Birmingham City Council in accordance with Section 2 Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982 should my application be granted.

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

Signature
Name of Signatory <u>GARY BROWN</u>	<u>DANIEL PARMA</u>
Designation of Signatory <u>DIRECTOR</u>	<u>DIRECTOR</u>
Date <u>13/11/18</u>	<u>13/11/18</u>





Etiquette & Club House Rules Book

Please take time to read your introduction pack.

It may help you feel more confident on your first shift, if you know a little about Paradise City.

Any questions you may have after reading it can be discussed with any of the management team.

Good luck we hope you'll settle in quickly and enjoy your time at Paradise City.



WHAT MAKES A GOOD LAP DANCER

PLEASE DO THIS:

- Greet customers in a warm and friendly manner, a smile works wonders.
- You are an entertainer and you are on show as soon as you are in the club
- Make sure your appearance is immaculate, Hair, Nails, Make Up, Dress etc.
- Show self-confidence (Even if you don't feel it)
- Have a sense of humour
- Pay full attention to the customer at all times, A conversation is often more important than the dance and it helps the customer to relax and makes them feel that they are more than just a £20.00 note.
- These may sound like obvious attributes, but when you're tired or fed up, you cannot let this affect your work or dancing performance.
- The customer is expecting the above and if you can't deliver, you can't earn.
- Do not; give the impression that you are too busy to talk.
- Do not; show a negative attitude.
- Do not; neglect your appearance.
- Do not; talk about other girls, customers or the club in a negative way.
- Do not; argue with customers or other dancers.
- Do not; talk about your private life.
- Do not; moan or complain unnecessarily about customers or other dancers.
- Do not; approach a customer as soon as he walks through the door.

THE LAP DANCE EXPERIENCE

- A lap dance is a personal experience for both the customer and yourself; the customer should feel that you are only interested in them.
- Please make sure you get paid before you start a dance.
- The customer may not have the money or may refuse to pay.
- **GETTING PAID IS YOUR RESPONSIBILITY.**
- A good dancer will hold eye contact for as much of the dance as possible, follow your hands with your eyes and then back to the customer.
- Do not look around the room for your next customer whilst doing your dance.
- Ladies are using lap dancing clubs more and more with their partners, you should treat them with the same courtesy and professionalism as our male clientele. They appreciate a good female body as much as a man and are often quite intrigued by your dancing. They are paying customers, the same as men, please make them feel welcome.
- There are clocks in the dance rooms, discreetly check the time; do not keep checking your watch.



THE APPROACH

- Allow the customer to come in buy a drink and pay for it before you approach him.
- Approach the customer with a smile and ask if you can join them.
- Introduce yourself with a handshake.
- Make polite conversation if the time allows.
- After 3-5 minutes of chat ask the customer if they would like you to dance for them, if they say no, ask is there anyone else that they would like to talk to or have a dance from, if he points someone out, let them know and move onto the next customer. This is dancer etiquette; remember another dancer will do the same for you if you show them this courtesy.
- If a customer says that they don't want a dance, do not be rude or pass comment, be polite, be professional and move on.
- When you finish, give them a kiss on the cheek and say goodbye and thank you.
- Sit down and put your clothes back on, then either chat or leave the dance area, do not leave the customer sitting unattended in the dance room.
- You can still refer the customer to another dancer at the end of your dance if you wish, if he does not want another dance from you straight away.
- Your dance is only three minutes long, so with the chatting at the beginning and the end, you are only spending about 10 minutes with each customer.

THE DANCE

- This is a chance to showcase yourself.
- Make your stage show sexy, exciting, entertaining and erotic.
- You'll secure a few dances from customers who see your routine.
- You are performing to an audience and your aim should be to get their attention.
- You know what the customers want to see, sexy, erotic, fun and approachable girls.
- Impress them on stage and its money in the bank.
- Many of you have two girl routines, you should practice them continuously, this is great if you are worried about being on stage alone.
- An unrehearsed routine however, looks bad and won't earn you any money.
- The more effort you put in the more you will get out.
- You will be introduced by the DJ, walk on stage with confidence and a smile.
- Act sexy, make eye contact with individual customers to make them feel special.
- Perform your pole tricks with as much sex appeal as possible.
- Wear sexy outfits.
- Use the whole of the stage during your show.
- Never go through the motions because you have to.
- Never try new tricks on the pole without a rehearsal.
- Dancers who earn well, take pride in their appearance and their job.
- This means constant practice and close attention to detail.
- Follow these simple rules and you should earn good money.



DRESS CODE

- All dancers should wear dresses until midnight unless prior agreement with the management, for example themed nights.
- These should not be transparent and should not be short in length.
- No bikini style outfits with matching shorts should be worn.
- Please ensure that your dresses / outfits are clean and well presented.

DRESSING ROOM ETIQUETTE

- Please keep the dressing room clean and tidy, put rubbish in the bins.
- If bottles and glasses are taken into the dressing room, please take them back out when you leave.
- Please do not leave your valuables like money, mobile phones etc. on display, they are your responsibility, please use the lockers provided.
- Do not borrow items from the other girls without their permission, as it will cause unnecessary friction.
- Security cameras are installed through the building for your security and protection.

CUSTOMERS

- It is strictly forbidden for dancers to fraternise with Paradise City customers.
- Telephone numbers must not be exchanged with customers.
- The club considers this a serious offence, if a card is given out by a customer, for example folded up in a note, it must be seen to be disposed of to avoid unnecessary action.
- Dancers at Paradise City should never arrange to meet customers after work.
- You should never receive money from a customer on the understanding that you will meet him outside the premises even if you have no intention of doing so, this is procuring money by deception or procuring money for sex both are illegal and will never be tolerated by the club.



ALCOHOL AND DRUGS

- Drugs will not be tolerated.
- Dancers may drink in moderation
- Dancers are requested not to carry or drink from a bottle, use a glass.
- Any dancer suspected of being drunk will be sent home.
- There are those of you who can drink all night without it showing, and there are those that can't; you know who you are.
- Never drink so much that you are not in control of your dance and your customer; if you're drunk you may not think you're slurring your words and stumbling, but chances are, you probably are.
- There is nothing more unattractive than a girl who is drunk. This is a fantasy and you are supposed to be their ideal woman.
- No one wants a drunk slurring woman to dance or talk to them.
- Please limit your alcohol intake or you will be sent home.

PARADISE CITY WILL NEVER TOLERATE DRUG USE.

- Anyone caught using, supplying or believed to be under the influence of drugs will be sacked without hesitation.
- We are not prepared to risk everyone's jobs for the sake of a few who put the license of Paradise City in jeopardy if you bring drugs into the club.
- If you are found to be in possession of a controlled drug. You will be dismissed with immediate effect.
- If you are found to be in possession of drugs with intent to supply to assist in the supply or distribution of controlled drugs, you will be dismissed with immediate effect and the police will be called.
- We appreciate that you do a difficult job, but if you need drugs to get you through, then you need to re-assess your choice of work.

PARADISE CITY OPERATES A ZERO TOLERANCE POLICY TOWARDS DRUGS

PAYMENT OF FEES & DISCIPLINARY PROCEDURE

- House fees must be paid on arrival.
- Receipts for house fees and any additional charges are provided by management.
- Breaching the club rules will result in disciplinary action being taken and may result in instant dismissal from the club.
- Breaching the standard conditions of our license (which you will be made aware of on your induction) will result in dismissal from the club.



DANCES

- A dance will last for one song (approximately 3 minutes).
- The customer is not allowed to touch the dancer, politely tell the customer to stop or you will end the dance if he / she continues.
- If the customer requests you to continue for another dance, you must replace your G string before you continue into the next song and any other subsequent songs.
- Chewing gum whilst working is not permitted
- When using mobile phones whilst in the club please use the designated areas.
- You are not allowed to use a mobile phone in view of customers.

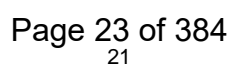
OTHER ISSUES

- No one should leave the club without a member of management being made aware.
- Dancers for their own security will be escorted to their cars at the end of a night or be seen getting to a pre booked taxi by one of the management or security.
- You must not have your boyfriend / husbands in the club when you are working.

CUSTOMERS, COMMENTS AND BEHAVIOUR

- It is unacceptable for customers to be rude to you, the reverse also applies.
- Do not swear at customers, walk away and let management or security handle the problem.
- If you have a problem with a customer, please inform management or security and let them deal with it.
- You should not attempt to deal with it yourself as it can make the situation far worse.
- If you are in any of the private rooms and feel unable to deal with a customer, either leave the room and report it to management or security failing that use the wall mounted panic alarm.
- Do not put yourself at risk.



[illegible]

From: bw licensing <bw_licensing@west-midlands.pnn.police.uk>
Sent: 13 December 2018 14:24
To: Licensing
Cc:
Subject: Sev - application 193-194 Broad Street

Dear Birmingham City Council Licensing authority –

Reference – SEV application by Paradise City (193/194 Broad Street) by Parma (Midlands) limited

West Midlands Police have received the SEV application submitted for a premise called Paradise City to be located at 193/194 Broad Street.

These premises used to be called Legs 11, which was a premise that benefited from an SEV licence as well as a premise licence issued under the Licensing Act 2003. They operated as a lap dancing venue.

The SEV policy for Birmingham City council sets out the relevant grounds for an objection to be lodged. West Midlands Police base this objection under the following grounds –

- The applicant is unsuitable to hold an SEV licence
- That the SEV, if granted would be carried on for the benefit of person/s who would be refused an SEV licence if they had applied themselves.

The SEV policy also indicates mandatory and discretionary grounds that the licensing committee can refer to, to refuse any such application.

In the discretionary grounds it states

- the applicant is unsuitable to hold the licence by reason of having been convicted of an offence or for any other reasons;
- if the licence were to be granted, renewed or transferred the business to which it relates would be managed by or carried on for the benefit of a person, other than the applicant, who would be refused the grant, renewal or transfer of such a licence if he/she made the application himself/herself;

The basis of the objection by West Midlands Police falls under the above criteria and for the following reasons.

As stated previously these premises used to be called Legs 11, which was a premise that conducted activity under an SEV licence. The SEV licence and the premise licence under the licensing act 2003 were both revoked in 2017.

At the time Legs 11 was being run, it was being operated by a company called "Clear Blue Sky thinking limited". At the time when the premise was being operated "Clear Blue Sky thinking limited" had two directors, a Thomas Taylor and Sidney Taylor.

The DPS under the premise licence was an Edmund Haxhia.

Due to complaints being received through Action Fraud and to the licensing authority enquiries were made through 2017 into the running of the venue and its operations.

During these investigations it was discovered that another company called "Take it back limited" was also involved in the operational control of the premise, as they were taking all the payments from the debit/credit card PDQ machines as well as.

West Midlands Police are also aware that the public liability insurance held for both Legs 11 Broad Street and Ladywell Walk, was taken out by companies controlled by a Daniel Parma. The insurance for Legs 11 Broad Street, was taken out by Take it back ltd which as described below is a company with Parma as the sole director. The Ladywell Walk premises was taken out by Dansid Limited.

Both insurance policies have the name of the insured as "Take it back ltd t/a as Legs 11" for Broad Street and "Dansid ltd t/a as Legs 11" for Ladywell Walk.

From a Companies House search "Take it back limited" and "Dansid Limited " are still shown as active companies. Micro accounts have been filled for both companies, Take it Back Limited were completed on the 29th March 2018 and Dansid limited on the 30th Nov 2017, with the nature of the business described as Licensed Clubs.

The sole director of these companies is called Daniel Parma. Parma was not mentioned on any previous application for Legs 11, although it was and still is very clear that he was involved in the premises as he was taking payments through the PDQ machine and obtaining insurance for both premises.

West Midlands Police strongly believe that Parma was the main person behind the running of Legs 11, even though he was not mentioned on any application. When officers conducted a visit at Legs 11 Ladywell Walk, after the closure of the Broad Street premises they were greeted by staff and when asked who was in charge directed officers to Parma.

This is reinforced with the details surrounding the public liability insurance and this evidence shows the level of control that Parma had on the premises although this was not reflected in any of the licenses issued to either of the premises.

The involvement of Parma and the way Legs 11 Broad Street was run that ultimately led to the revocation of the SEV license and Premise licence is very significant. Through 2017 investigations took place in relation to alleged sexual activity being offered to patrons in the premises. Officers seized CCTV to investigate the complaints, during which time evidence was discovered that corroborated complaints that had been received around fraudulent activity of customer credit/debit cards.

From 2013 complaints has been received that customers were having very large sums of money taken from bank accounts, after visiting the premises. In the early part of 2017 there had been 4 such reports where the total taken had reached £23,965.

By the time these complaints had been received, the delay in the processing meant that the CCTV was not available to corroborate the allegations. Customers had to deal with telling family members, the potential embarrassment and stress which compounded the delay in the process.

One customer in 2017 had £9,000 taken from his account. The day after visiting the premises he bought a home drugs testing kit, which indicated that he had Methadone in his system, a drug he had never taken.

This was not the first time such allegations were made, a common theme of the complaints was that customers did not remember anything of the night and concluded that they had either been drugged or had been given large volumes of alcohol.

It was when officers were reviewing the cctv that officers saw evidence of numerous people who appeared to be very drunk, or under the influence of other substances in the booths. In most cases they were encouraged to drink more by the dancers. The CCTV showed where drunk customers would hand over cards for the PDQ machines who were not in control of what they were doing.

Whilst it is not sure if any of the persons seen on the CCTV were those who had reported any offences to Action Fraud, West Midlands Police were satisfied that is corroborated evidence from previous reports.

West Midlands Police are also aware that officers from the local authority conducted a test purchase at the premises and were offered sexual activities as an extra payment, which is contrary to what is permitted within the confines of the SEV license.

Any factor of the complaints was the fact customers were offered "extra" services behind closed doors that would be locked.

It is noted that part of the current application seeks to allow for a room to be locked, which an explanation that it was for security reasons. This is doubted by West Midlands Police as previously the premises were found with locks on doors, and there is direct evidence from an operation about officers being offered "extra" services as well as the complaints from patrons.

What this shows is that this was a very badly run premises, that was exploiting customers who had been to the premises, putting their safety at risk all for financial gain. One of the key names involved in the premises when this activity was taking place was Daniel Parma.

The new application has been put in by a private limited company, which was incorporated on the 23rd January 2018. At the time the company was incorporated Daniel Parma was the sole director. On the 29th October 2018 another director called Gary Brown was also appointed.

On the 10th October, the solicitor who has lodged this application stated to West Midlands Police that he had been appointed by his client Daniel Parma to ask for a meeting to look at opening a new lap dancing club. It is noted that West Midlands Police declined the invitation, however it is not seen as insignificant that after the meeting was declined by West Midlands Police another person was added as a director.

The new application does state that Parma was involved in the management of the Legs 11 for both Broad Street and Ladywell walk, although it makes no mention of the company that was taking the payments from the PDQ machines.

In the supporting paperwork submitted with the application it shows under tab 9 a management tree, again it is not seen as insignificant that Parma does not appear on this tree, a similar situation to what was happening when the premises operated as Legs 11. Evidence has already shown that Parma was the controlling figure and West Midlands Police believe the same would happen again if this licence was granted.

The new grant application has also demonstrated the link between the old Legs 11 and the new proposed premise.

In the application it names 3 persons on page 4, who they state have been involved in other applications for SEV establishments. All 3 have been involved under the previous name of Legs 11, both Broad Street and Ladywell Walk. Although Ruxandra Niculescu is not listed in the application she is part of the new proposed senior management team as documented in the supporting bundle.

Mr Gary Brown is a late addition into the management team, although he is seen as a smoke screen to deflect attention away from Parma, who was so explicitly involved in the financial management and control of Legs 11.

Under tab 9 in the supporting bundle it names the door supervisors as Zviad, with his biography in the paperwork. In this documentation it shows that Zviad was the door supervisor for Legs 11 Broad Street from 2014 until it was closed in 2017.

- All of this indicated to West Midlands Police that the new proposed operation seeks to replicate the old Legs 11, they have a number of the same people involved at the time when these premises were shown to be operating not in accordance with their SEV licence, exploiting customers through drink and/or drugs to maximise financial gain, as well as conduct fraudulent activities.

West Midlands Police therefore object to this application, on the grounds the applicant is not suitable, for the reason pointed out above; and/or if it is the point that the application purports Brown to be main operator that this

would not be the case and that the premises would be operated for Parma who would be the main controlling figure.

West Midlands Police therefore request a hearing for this application

Kind regards

Abs Rohomon

**PC 4075 Rohomon
BW Licensing
Police headquarters
Lloyd House
Colmore Circus
Birmingham
B4 6NQ**

**Internal : 801 1631
External : 0121 626 6099**

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Tel. 101 Ext 8011627**

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From: Christina McCullough
Sent: 20 December 2018 13:18
To: Licensing
Subject: SEV Representation - Paradise City
Attachments: SEV representation Paradise City.pdf

Please find attached a representation in relation to the application for a SEV Licence at 193-194 Broad Street.

On behalf of Licensing Enforcement I wish to lodge my objection to the grant of the above licence.

Christina McCullough
Licensing Enforcement Officer

Secure email: Christina.X.McCullough@birmingham.gcsx.gov.uk

Birmingham City Council,
Licensing Section,
P.O. Box 17013,
Birmingham,
B6 9ES

www.birmingham.gov.uk/licensing

Twitter: @BCCLicensing

For information on Birmingham Licensed premises including licensed hours, activities and conditions go to
<http://publicregister.birmingham.gov.uk>

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Application for the grant of a Sexual Entertainment Venue Licence for Paradise City, 193-194 Broad Street, Birmingham.

Birmingham City Council, Licensing Enforcement wishes to make a representation in respect of the above application.

The application is made by Gary Brown, a Director of Parma (Midlands) Limited. A licence is requested for the operation of a gentleman's club at the premises formerly known as Legs 11.

Meeting with Gary Brown 14th December 2018 at 11.00 hours

As part of an application for the grant of a Sexual Entertainment Venue Licence an inspection is carried out at the premises to ascertain how the conditions can be met and to assess the level of understanding of the applicant.

On 14th December 2018 I met with Gary Brown, a director of Parma (Midlands) Limited.

- At the time of the inspection no dancers were employed. Mr Brown seemed to be aware of the documentation that was required before any performers could work.
- He agreed that they had used the house rules that were used by Legs 11 and that a very small amount of amendments had been made.
- Mr Bamber was present at the meeting. He said that he would be carrying out compliance checks to ensure that they were operating correctly. I asked Brown what about when they no longer employed the services of Mr Bamber, he said that they would for the first year and then assess the situation after that.
- He admitted that Daniel Parma would be the controlling mind of the business.
- We discussed the use of the VIP room and that it was requested as part of the application that special dispensation be made for a lock to be fitted to the door. I explained that I did not agree to any locks being fitted. We discussed the safety implications of a lock being fitted to the outside of the door, including the previous experiences that had been witnessed by myself in that room. I also advised that even though it would be a free bar responsible drinking still had to be monitored.
- He anticipated that the fees for private dances in the VIP room would remain as £500 per dancer per half an hour.
- The premises is in a state of disrepair and is currently being worked on.

- He assured me that all fees would be paid through the account of Parma (Midlands) Limited and no other companies. He explained that he did not see how this could happen. I explained that it had previously and that the money paid by cards had gone to a company of which Daniel Parma was the Director
- The drugs policy offered relates to customers, I asked about dancers and staff and how this would be monitored. He said that they would have a zero tolerance.
- He believed that the best way to make dancers comply was education and not fines. All dancers would have to read and understand the conditions of the licence. Each would have to sign that they understood and would abide by them. I explained that this was a requirement of the licence and they had all done so when the premises was previously trading as Legs 11. However, this had not stopped the dancers from performing prohibited actions nor the managers stopping them.
- He advised that a lot of extra procedures would be implemented if they were granted the licence.

General

Parma states on the application that he has not been the holder of a SEV licence. At the time Legs 11 was revoked he had a controlling influence in the day to day operation of the business. I had numerous dealings with him and he made the decisions. He spoke to me about future plans that they had for the business, in fact on one occasion he asked me about installing a Jacuzzi for a VIP room. I only met Thomas Taylor once, it was evident that he was not the controlling mind behind the business; it was on that occasion that I discussed with Parma the removal of the lock from Room 11. In fact Parma confirms in this application that he was involved in the management of Legs 11.

I consider that it was established beyond all reasonable doubt that Daniel Parma was not only involved in the day to day running of both branches of Legs 11 but profited financially from them as well. Both premises of Legs 11 had SEV licences in the name of Clear Blue Sky Thinking Limited, however, it appeared that the money was going elsewhere.

- **Legs 11 trading at 193-194 Broad Street, Birmingham** monies paid by debit or credit card, including private dances was taken and processed by Take It Back Limited (company registration number 08048966). Daniel Parma is and always has been the sole director. Take It Back Limited was incorporated on 27th April 2012. On 27th January 2015 the registered office address became 193-194 Broad Street. On 22nd August 2017 the registered office became 23 Broom Hall Crescent, Birmingham, B27.

Displayed in the foyer of the premises was the PRS Licence certificate and the Public Liability Insurance, both documents were in the name of Take It Back Limited. The insurance certificate stated Take It Back Limited T/A Legs 11. **A copy of each document and the company search for Take It Back Limited is attached.**

- **Legs 11 trading at Ladywell Walk, Birmingham** monies paid by debit or credit card, including private dances was taken and processed by Dansid Limited (company registration number 0825260). Daniel Parma is and always has been the only director. Dansid Limited was incorporated on 15th November 2012. On 27th January 2015 the registered office address became 30 Ladywell Walk, Birmingham B5. On 22nd August 2017 the registered office became 23 Broom Hall Crescent, Birmingham, B27.

Displayed in the foyer of the premises was the Public Liability Insurance. This document stated Dansid Limited trading as Legs 11, 30 Ladywell Walk, Birmingham, B5 4ST. **A copy of the Public Liability Insurance document and the company search for Dansid Limited is attached.**

An annual renewal inspection was carried out Legs 11 Ladywell Walk on 14th November 2016 in the presence of Ruxandra Niculescu, she stated that the business traded as Clear Blue Sky Thinking Limited and Dansid Limited, this information was entered onto the notice that was issued to the business. **A copy of this notice is attached.**

The application before Committee today, is seeking the grant of a SEV licence and a variation to the standard conditions in that Paradise City want locks fitted to the VIP room. When Legs 11 were operating under the SEV licence at Broad Street this is the room where CCTV clearly evidenced that major breaches took place, there has not been any structural changes to the interior of the building.

The applicant has taken advice from a consultant. The majority of points put forward by the consultant are covered by the conditions of the SEV Licence. The problems experienced at Legs 11 previously were not shortcomings in the Conditions attached to the licence they were all flagrant breaches that were clearly visible on CCTV footage. The breaches became the normal way in which the business was run, it became a culture that was permitted or condoned by the management of the business.

It is proposed that the day to day running of the business will be Gary Brown and Ruxandra Niculescu, **both of whom were involved with Legs 11.**

- **Brown** was the DJ at Legs 11, Ladywell Walk.
- **Ruxandra** was the DPS at Legs 11, Ladywell Walk. However when a visit was made to legs 11 Broad Street, she would always attend, or instruct

Edmund the DPS at that time where the documentation or information was stored. She was heavily involved in the Management of Legs 11, Broad Street.

The proposed staffing structure is virtually identical to when Legs 11 was trading, even the door staff are the same.

LOCATION

Residential Premises – A large apartment block is near completion on the opposite side of Broad Street at the junction with Sheepcote Street. This is a high rise apartment.

The Job Centre is directly opposite the venue. Behind the Job Centre is large residential area.

A number of student accommodation facilities also exist in the area.

Facilities Used by Families, Education, Leisure – Broad Street is a family orientated area. The area very near to the venue hosts a cinema and numerous restaurants.

A few doors away from the venue is a designated family entertainment centre, housing numerous restaurants.

Place or buildings of historical/cultural interest or tourist attractions – A number of listed buildings are in close proximity, full details of which are detailed on the plan provided by Planning.

Premises used for religious gatherings – At the rear of the premises on Bishopgate Street is the Birmingham Progressive Synagogue.

Does the premises hold an existing LA2003 Licence – No, the Licensing Act licence was revoked for criminality.

COMMENTS

The new application does not have any measures to prevent the same breaches occurring as previously did at Legs 11.

The management structure of the new business is almost identical to the management structure of Legs 11, the management allowed the breaches to take place.

Licensing Enforcement of Birmingham City Council therefore object to the grant of the Sexual Entertainment Venue Licence on the grounds of:

1. If the SEV Licence were to be granted it would be carried on for the benefit of Daniel Parma, who would be refused if he applied himself due to his previous involvement with Legs 11.
2. That the applicant is unsuitable to hold an SEV licence due to the proposed management structure and a Directors involvement with Legs 11.
3. Since Legs 11 closed a large residential apartment block is near completion in the vicinity. The premises is located next door to another SEV, two premises of this nature, within such close proximity to a large number of residential properties would cause an increase in the number of customers using these premises.

Christina McCullough

Licensing Enforcement Officer

Attachments.

1. PRS Licence displayed at Legs 11.
2. Public Liability Insurance displayed at Legs 11, Broad Street.
3. Company Search for Take It Back Limited.
4. Public Liability Insurance displayed at Legs 11, Ladywell Walk.
5. Company Search for Dansid Limited.
6. Copy of traders notice issued to Clear Blue Sky Thinking Limited and Dansid Limited at Legs 11, Ladwell Walk.
7. 5 screenshots showing the vicinity around 193-194 Broad Street.
8. Location plan provided by Planning.

Presented to: Take it Back Limited

For Business: Legs 11
193-194, Broad Street
BIRMINGHAM
West Midlands
B15 1AY

for supporting the writers and composers of music



Bring your business to life with music

License number: 741368

Valid until:

01 January 2013

2016

Public Liability - Evidence of Insurance

Policy Number	QBEC000000189
Ipism Reference	0000WB9M
Name of Insured	Take it Back Ltd t/a Legs 11
Correspondence Address	193-194 BROAD STREET BIRMINGHAM B15 1AY

Period Of Insurance

Effective Date and Time	04/06/2016 00:01
Expiry Date and Time	04/06/2017 00:01

Business Details

The Trade(s) Insured	Gentlemen's / Business Club
----------------------	-----------------------------

Public Liability Limit of Indemnity Any One Claim or series of claims arising out of Any One Event	£2,000,000
--	------------

Signed on behalf of QBE Insurance (Europe) Limited (Authorised Insurers)



Ash Bathia
Chief Underwriting Officer
Authorised Signatory

Public Liability Insurance is provided to the Insured under the above noted Policy Number and is subject to the terms and conditions and exclusions of the Policy

Your Insurers

Insurer: QBE Insurance (Europe) Limited
Registered Office: Plantation Place, 30 Fenchurch Street, London, EC3M 3BD
Registered Number: 1761561
FCA Register Number: 202842
QBE Insurance (Europe) Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority

Your Agent

Agency	
Agent Name	Coversure Harborne
Agent Telephone Number	0121 439 2929
Agent Address	318 High Street Harborne
Agency Number	ACOV0038

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TAKE IT BACK LIMITED

Company number **08048966**

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- [Persons with significant control \(https://beta.companieshouse.gov.uk/company/08048966/persons-with-significant-control\)](https://beta.companieshouse.gov.uk/company/08048966/persons-with-significant-control)

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1 officer / 0 resignations

PARMA, Daniel

Correspondence address **23 Broom Hall Crescent, Birmingham, England, B27 7JR**

Role Active **Director**

Date of birth **September 1977**

Appointed on **27 April 2012**

Nationality **British**

Country of residence **United Kingdom**

Occupation **Director**

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TAKE IT BACK LIMITED

Company number **08048966**

Registered office address

23 Broom Hall Crescent, Birmingham, England, B27 7JR

Company status

Active

Company type

Private limited Company

Incorporated on

27 April 2012

Accounts

Next accounts made up to **30 June 2018**

due by **31 March 2019**

Last accounts made up to **30 June 2017**

Confirmation statement

Next statement date **27 April 2019**

due by **11 May 2019**

Last statement dated **27 April 2018**

Nature of business (SIC)

• 56301 – Licensed clubs

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Certificate of Public Liability Insurance

Policy Number I11/112014/CC/001041
Ipsium Reference 0000TK94
Name of Insured Dansid Limited trading as Legs 11
Correspondence Address 30 LADYWELL WALK
BIRMINGHAM
B5 4ST

Period of Insurance

Effective Date and Time 01/03/2016 00:01
Expiry Date and Time 14/01/2017 00:01

Business Details

The Trade(s) Insured Gentlemen's / Business Club

Public Liability Limit of Indemnity Any
One Claim or series of claims arising
out of Any One Event £2,000,000

Signed on behalf of QBE Insurance (Europe) Limited (Authorised Insurers)



Ash Bathia
Chief Underwriting Officer
Authorised Signatory

Public Liability Insurance is provided to the Insured
under the above noted Policy Number and is subject to
the terms and conditions and exclusions of the Policy

Your Insurers

Insurer: QBE Insurance (Europe) Limited
Registered Office: Plantation Place, 30 Fenchurch Street, London, EC3M 3BD
Registered Number: 1761561
FCA Register Number: 202842
QBE Insurance (Europe) Limited is authorised by the Prudential Regulation Authority and regulated by the
Financial Conduct Authority and the Prudential Regulation Authority

Your Agent

Agency
Agent Name Coversure Harborne
Agent Telephone Number 0121 439 2929
Agent Address 318 High Street
Harborne
Agency Number ACOV0038

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Company number **08295260**

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PARMA, Daniel

Correspondence address **23 Broom Hall Crescent, Birmingham, England, B27 7JR**

Role Active **Director**

Date of birth **September 1977**

Appointed on **15 November 2012**

Nationality **British**

Country of residence **United Kingdom**

Occupation **Director**

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DANSID LIMITED

Company number **08295260**

Registered office address

23 Broom Hall Crescent, Birmingham, England, B27 7JR

Company status

Active

Company type

Private limited Company

Incorporated on

15 November 2012

Accounts

Next accounts made up to **30 November 2018**
due by **31 August 2019**

Last accounts made up to **30 November 2017**

Confirmation statement

Next statement date **15 November 2018**
due by **29 November 2018**

Last statement dated **15 November 2017**

Nature of business (SIC)

56301 - Licensed clubs

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No. 21046

Licensing (Enforcement) Section
P.O. Box 17013
Birmingham
B6 9ES



Chris Neville
Head of Licensing

Clear Blue Sky Thinking Ltd
Dancid Ltd
Legs Eleven

Enquiries to: C. McCullough

Telephone: 303 9358

30 Ladywell Walk
BS4 5ST

Date: 14/11/2016

Legislation: Local Government (Misc. Prov) Act 1982

The following matters have been identified which do not comply with the above legislation:

1. You are unable to produce the certificate of insurance to cover performers whilst the premises is open. (Condition 13)
2. Please ensure that the signing in register of door staff is dated.
3. You are unable to provide proof that Krishan Groopaj is entitled to work in the UK.
4. Performer - Yanique Gordon needs to produce a residency document/passport to prove that she can reside in the UK.
5. Bar staff - Nob. Hle Npof. needs to produce a residency document/passport to prove that she can reside in the UK along with a National Insurance

Received by:

R. Niculescu

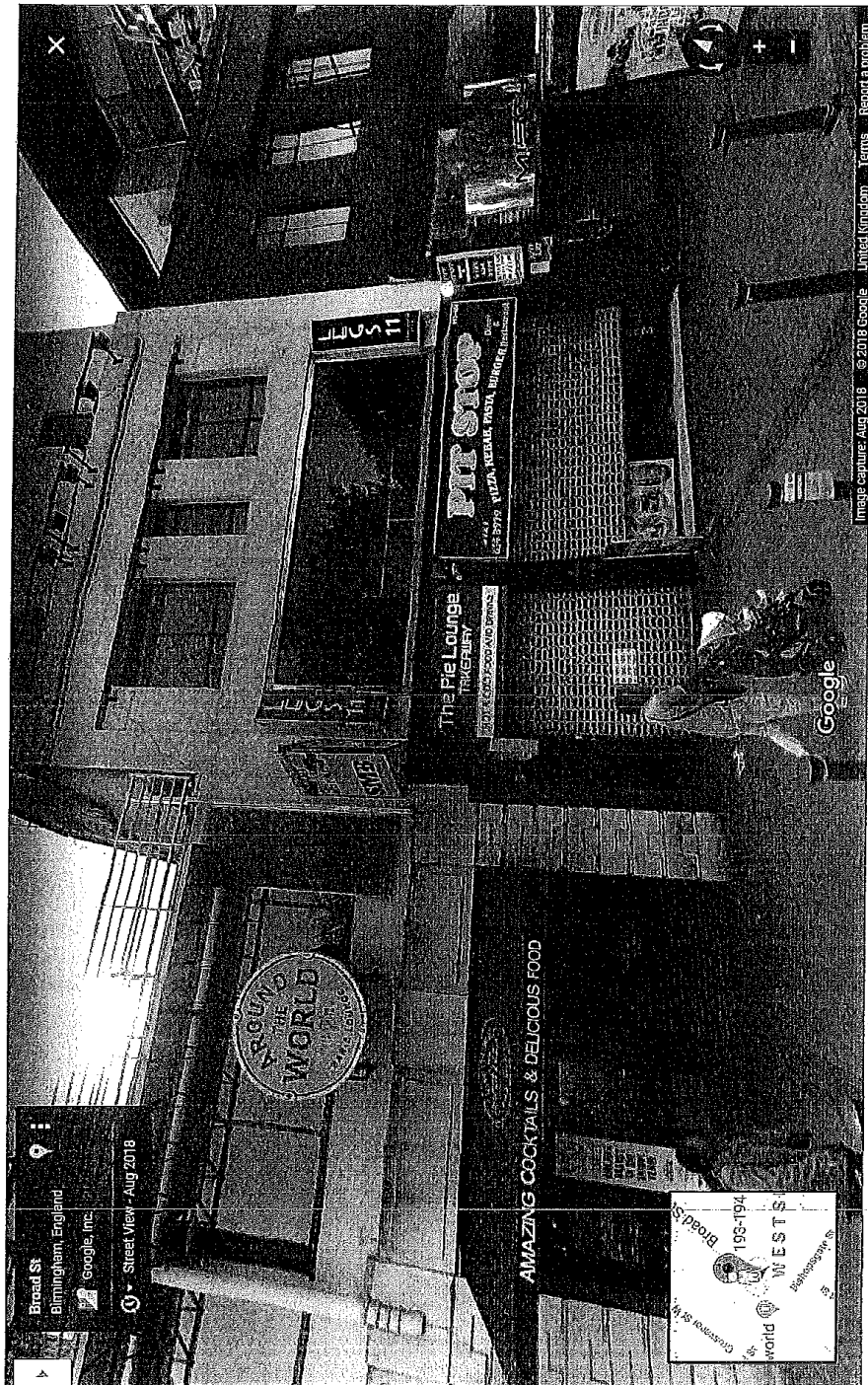
Authorised Officer:

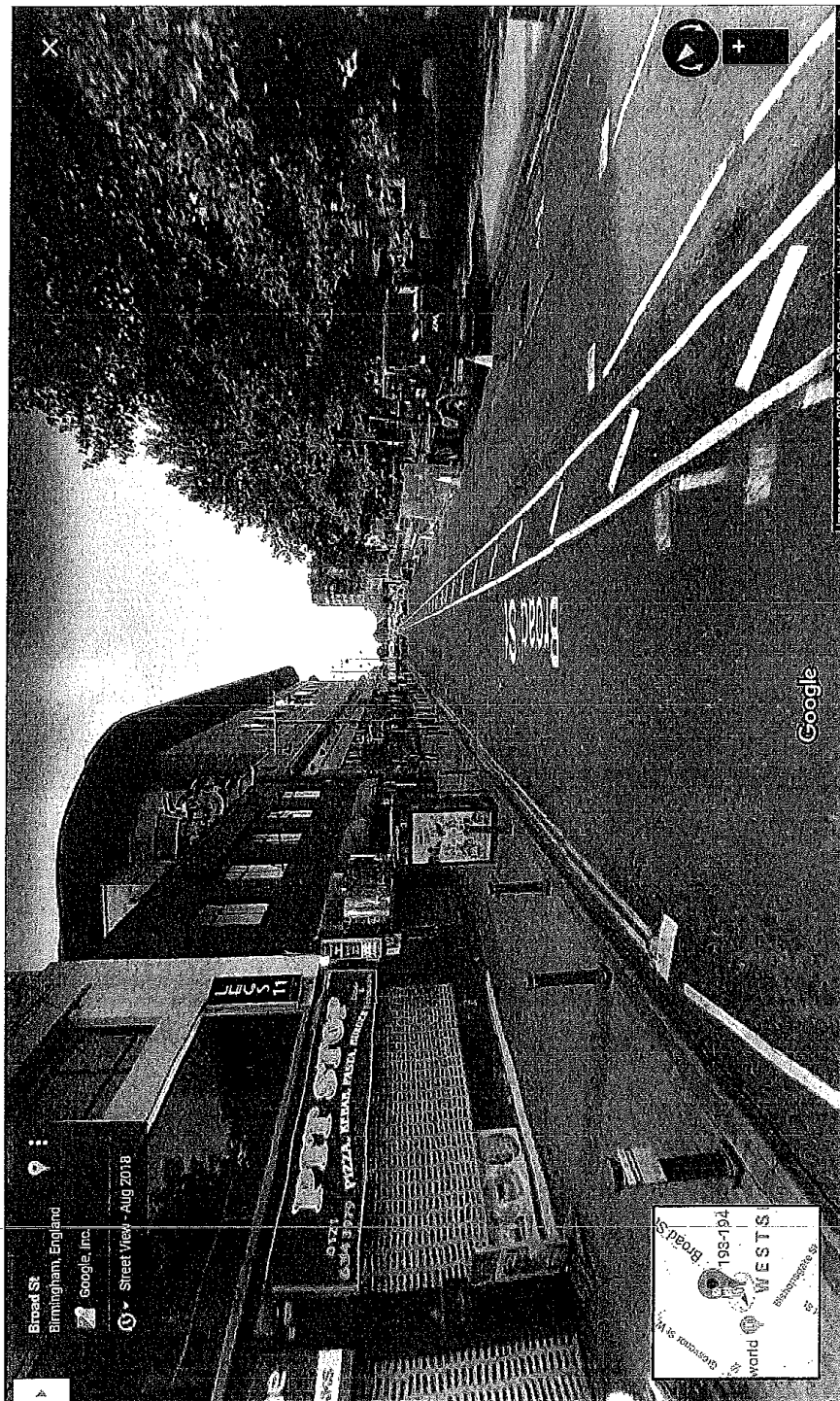
C. McCullough

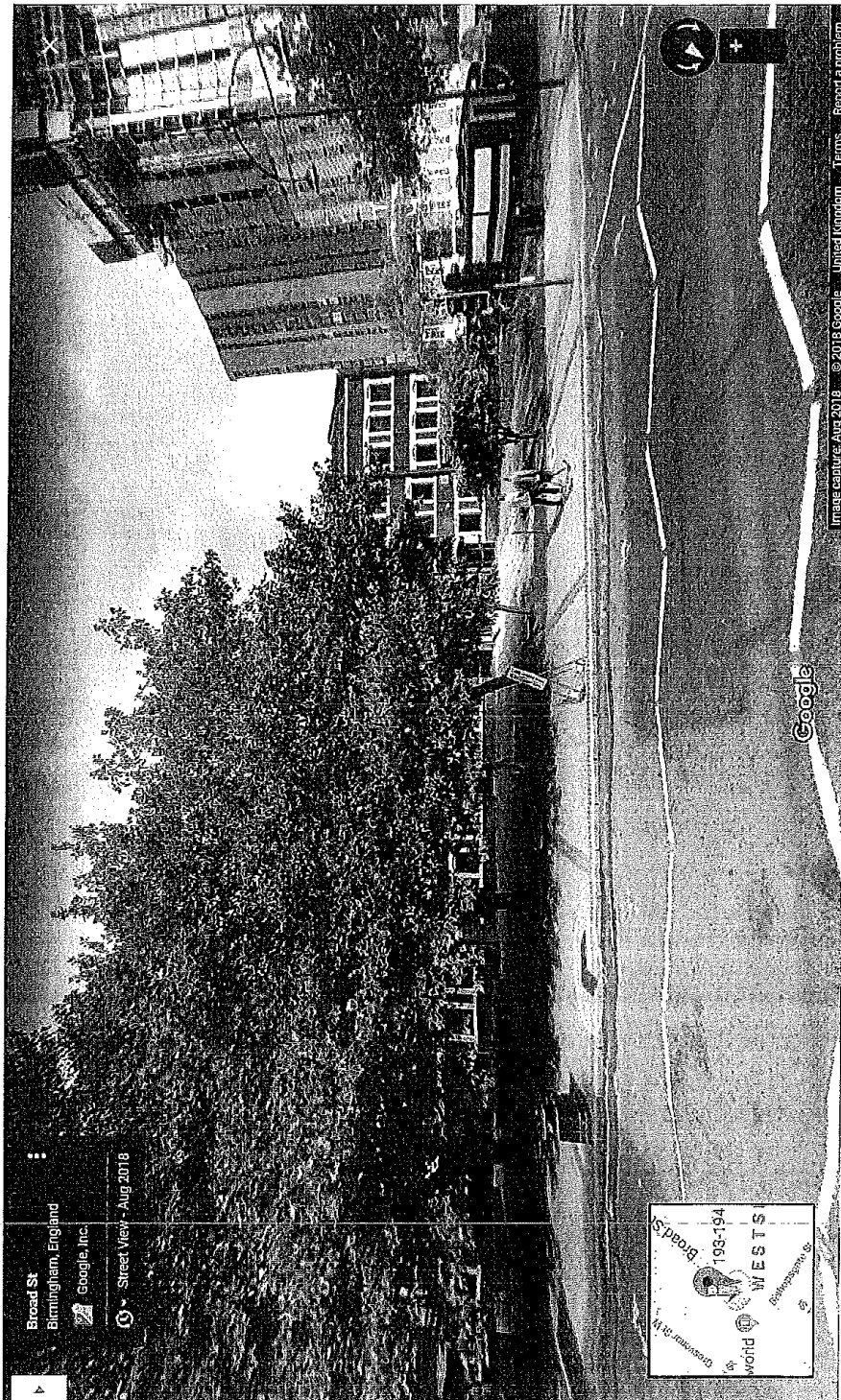


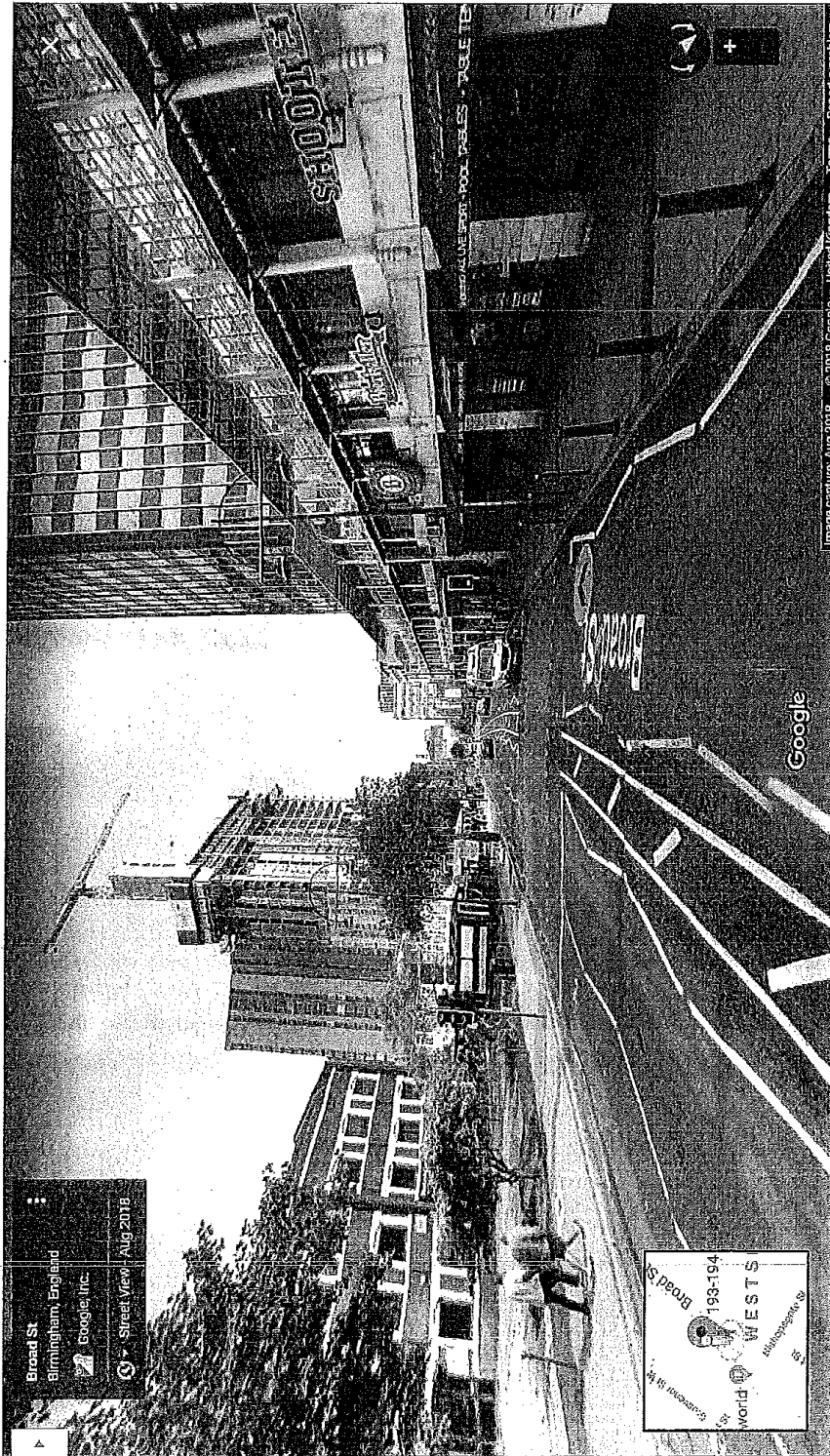
The Government Standard

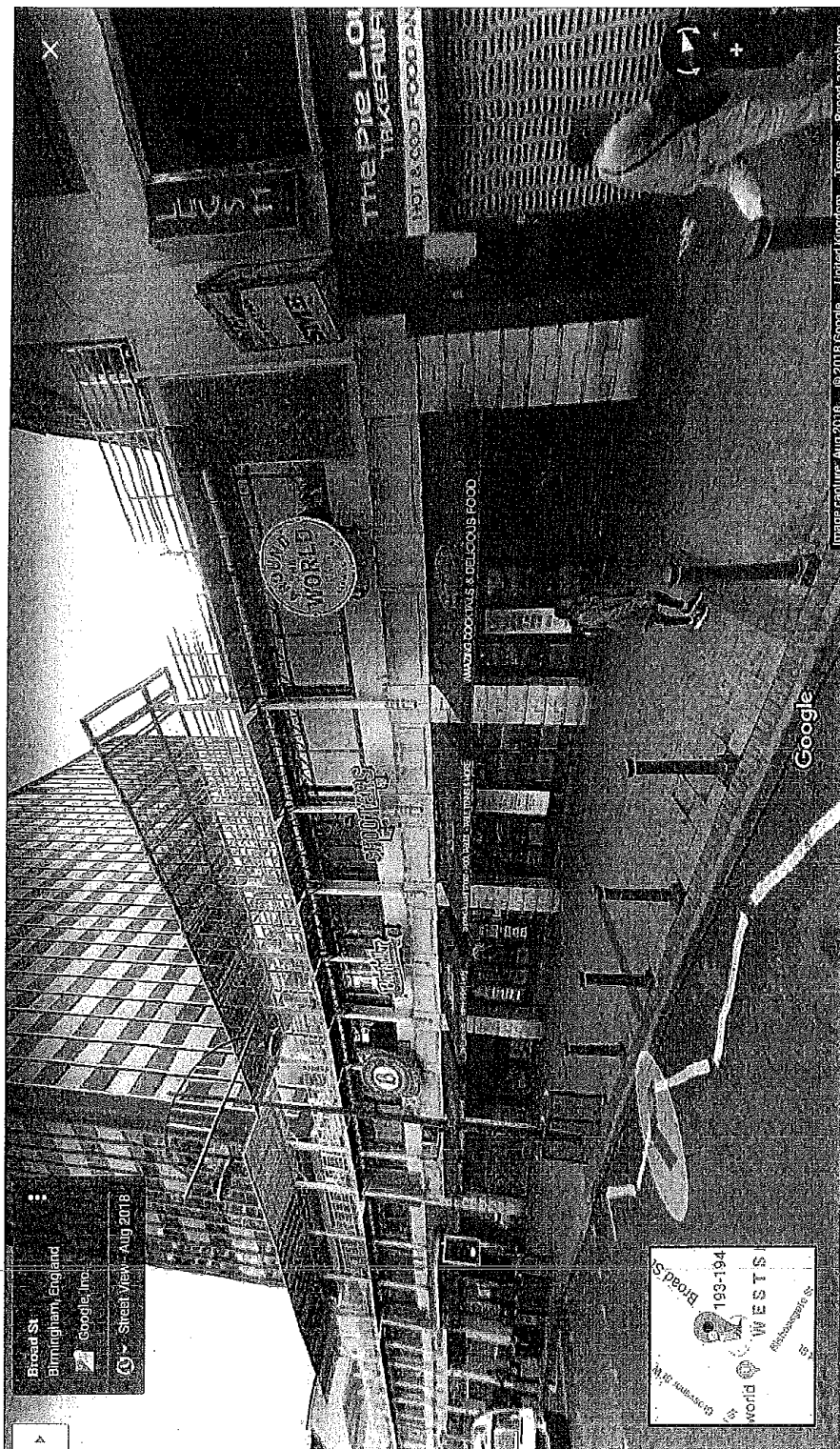
44.49











From: Heath Thomas <HThomas@hcrlaw.com>
Sent: 20 December 2018 17:17
To: Licensing
Cc:
Subject: Objection to the grant of a Sexual Entertainment Venue licence to Parma (Midlands) Limited in respect of 193-194 Broad Street, Birmingham

Dear Sirs,

I am instructed on behalf of Westside BID, Quayside Tower, 252-260 Broad Street Birmingham B1 2HF to object to the grant of a Sexual Entertainment Venue licence to Parma (Midlands) Limited.

The grounds of objection are set out below. Further details and evidence in support may be produced before the Licensing Committee in due course:

1. The grant of this licence is inappropriate having regard to the character of the locality:
2. The grant of this licence is inappropriate in light of the use of premises in the vicinity. These include, but are not limited to, The Library of Birmingham, The Birmingham REP, the ICC, NIA, Symphony Hall, Cineworld complex, family restaurants and other premises.
3. The applicant is unsuitable to hold a licence. We are concerned regarding the applicants suitability to hold a licence and its director's failure to comply with licensing conditions elsewhere. On the 3rd July 2017, West Midlands Police lodged an application for an expedited review of the premises licence for 193-194 Broad Street, Birmingham on grounds of crime and disorder. The premises licence holder at that time was Clear Blue Sky Thinking Ltd. That application arose following investigations around irregularities in financial transactions taken on the businesses PDQ machines, in that large volumes of money were being taken from peoples bank accounts. The company receiving those payments was Take it Back Limited (see West Midlands Police application for expedited review dated 3rd July 2018).

Daniel Parma, a director of Parma (Midlands) Limited, the proposed premises licence holder, was a director of Take it Back Limited at that time, and it is submitted that this evidences a clear link between him and Clear Blue Sky Thinking Ltd, the former premises licence holder.

Both Daniel Parma and Gary Raymond Brown held senior positions at the former Legs 11 premises, and as such there is a real risk that the proposed premises licence holder will engage in similar criminal activity and breaches of the Licensing Act 2003. Daniel Parma is also a former director of Legs 11 Europe Ltd (dissolved), jointly with Sidney Taylor, a former director of Take it Back Limited. This further evidences the strong links between the applicants for this premises licence and the former operators whose licence was revoked.

The Sub-Committee determined to revoke the premises licence for Clear Blue Sky Thinking Ltd and it's reasons were due to concerns by West Midlands Police in relation to various matters which were outlined in the Chief Officer of Police's Certificate and Application and supporting evidence. Those matters were supported by Birmingham City Council, Licensing Enforcement and Birmingham City Council Trading Standards who had conducted their own investigations. The Sub Committee determined the causes of the serious crime and or serious disorder and various public safety concerns appeared to be orchestrated by an individual who was linked to organised criminal gangs in Eastern Europe, which included but was not limited to financial fraud and human trafficking.

The Sub Committee also heard and saw CCTV evidence which demonstrated various breaches of the Premises Licence the scale of which the Sub-Committee found deeply concerning. This included but was not limited to:

- the unauthorised sale of alcohol;
- serving patrons who were clearly already inebriated and/or otherwise under the influence of prohibited substances; and

The Sub Committee were also presented with compelling evidence from various sources which suggested that the premises were also responsible for:

- defrauding patrons out of significant sums of money. The Police submitted in evidence that the company which appeared to run and manage the business at the premises had turned over £1.6 million pounds in a six month period alone;
- patrons either routinely being overcharged for the services provided at the premises, or not being able to recall ever agreeing to the provision of the services in the first place;
- evidence presented to the Sub Committee included a statement from a patron of the premises who challenged a significant financial debit on his credit card which he had no recollection of making. He subsequently undertook a home drug test which suggested that he had consumed methadone without his knowledge.
- patrons' credit cards being routinely overcharged in the days following their visit to the licensed premises, or that these transactions would otherwise be in breach of the Consumer Protection from Unfair Trading Regulations 2008 in that patrons were being misled in regard to the price of goods and services;
- the Sub Committee were shown evidence that on at least one occasion a patron of the club had been offered sexual intercourse in exchange for money.

The Sub Committee were satisfied on the balance of probabilities that the premises were indeed associated with serious crime and disorder, and that promotion of the public safety objective within the Licensing Act 2003, was being significantly undermined.

Kindly acknowledge receipt of this representation.

Yours faithfully


Heath Thomas

Heath Thomas

Partner
Head of Licensing & Regulatory Team & Wye Valley Office
For and on behalf of Harrison Clark Rickerbys Limited

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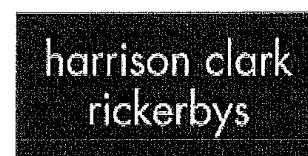
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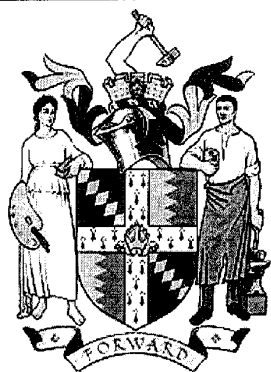
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BIRMINGHAM CITY COUNCIL SEXUAL ENTERTAINMENT VENUE POLICY

EFFECTIVE FROM 1st November 2014

Licensing Service at Crystal Court,
Aston Cross Business Village
50 Rocky Lane,
Aston,
Birmingham, B6 5RQ

OR alternatively by email to: licensing@birmingham.gov.uk

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1. Introduction

- 1.1 Birmingham City Council ("the Council") is able to regulate sex establishments through Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982 ("the 1982 Act"), in particular sex shops and sex cinemas.
- 1.2 On 6 April 2010 the Policing and Crime Act 2009 ("the 2009 Act") came into force and amended Schedule 3 of the 1982 Act. Sexual Entertainment Venues ("SEVs") were added as a category of sex establishments to enable local authorities to regulate those premises which provide lap dancing, pole dancing, table dancing, strip shows, peep shows and live sex shows and other similar entertainment.
- 1.3 The Council resolved on 12 October 2010 to adopt the new amendments to gain regulatory control of SEVs with effect from 3 January 2011. Consequently, this SEV policy applies to the whole of Birmingham.
- 1.4 The adoption of Schedule 3 allows the Council to prescribe standard conditions and fees for the grant, variation, renewal and transfer of SEV licences and the appropriate number of premises to be licensed in a relevant locality, which may be nil.
- 1.5 The aim of this policy is to provide guidance for prospective applicants, existing licence holders, those who may wish to object to an application and members of the Licensing and Public Protection Committee when making a determination on an application. This policy will be reviewed regularly and revised where necessary.
- 1.6 Each application will be dealt with on its own merits
- 1.7 Consideration will be given to the provisions of the Human Rights Act 1998, the Provision of Services Regulations 2009 and the Home Office guidance issued in March 2010 entitled "Sexual Entertainment Venues – Guidance for England and Wales" when considering applications for SEVs.
- 1.8 The Council does not take a moral stance in adopting this policy. The Council recognises that Parliament has made it lawful to operate sex establishments and that such businesses are a legitimate part of the retail and leisure industries. It is the Council's role as a Licensing Authority to regulate such premises in accordance with the law.

2. Sexual Entertainment Venues

- 2.1 An SEV is defined in the 2009 Act as "any premises at which relevant entertainment is provided before a live audience for the financial gain of the organiser or the entertainer".
- 2.2 The meaning of 'relevant entertainment' is "any live performance or live display of nudity which is of such a nature that, ignoring financial gain it must

reasonably be assumed to be provided solely or principally for the purpose of sexually stimulating any member of an audience (whether by verbal or other means)". An audience can consist of just one person.

2.3 This definitions would apply to the following forms of entertainment [as they are commonly known]: lap dancing; pole dancing; table dancing; strip shows; peep shows and live sex shows. This list is not exhaustive and should only be treated as indicative. The decision to licence premises as sexual entertainment venues shall depend on the content of the relevant entertainment rather than the name given to it.

2.4 The 2009 Act provides exemptions from the definition of SEVs as follows:

- Sex shops and sex cinemas (which are separately defined in Schedule 3 to the 1982 Act).
- Premises which provide relevant entertainment on an infrequent basis. These are detailed as premises where:
 - (a) no relevant entertainment has been provided on more than 11 occasions within a 12 month period;
 - (b) no such occasion has begun within a period of one month beginning with the end of the previous occasion; and
 - (c) no such occasion has lasted longer than 24 hours.
- Other premises or types of performances or displays exempted by an order of the Secretary of State.
- Private dwellings to which the public are not admitted

2.5 Premises which provide regulated entertainment on an infrequent basis will continue to be regulated under the 2003 Act insofar as they are providing regulated entertainment under that Act either by virtue of a premises licence or club premises certificate or a temporary events notice issued under that Act.

2.6 In practice this means that the vast majority of lap dancing clubs and similar venues will require both a SEV licence for the provision of relevant entertainment and a premises licence or club premises certificate for the sale of alcohol or provisions of other types of regulated entertainment not covered by the definition of relevant entertainment.

2.7 Live music or the playing of recorded music which is integral to the provision of relevant entertainment such as lap dancing for which a SEV licence is required is specifically excluded from the definition of regulated entertainment in the 2003 Act. Therefore, a SEV will not require a premises licence or club premises certificate just because it plays recorded music for a performer to dance to.

3. **Waivers**

3.1 Schedule 3 of the 1982 Act makes provision for the Council to grant a waiver from the requirement to hold a sex establishment licence in any case where it

considers that to require a licence would be unreasonable or inappropriate. A waiver may be for such a period as the Council thinks fit. Applications for waivers will be considered in exceptional circumstances.

- 3.2 The Council may at any time give a person who would require a licence but for a waiver, notice that the waiver is to terminate on a date not less than 28 days from the date the notice is given.

4. **Making an Application**

- 4.1 The 1982 Act provides a maximum licence period of one year. The authority may grant a shorter licence if it thinks fit. A shorter period may be granted for example where a licensee wants a licence for a limited period for a trade exhibition or a show.
- 4.2 An application for the **grant, variation, renewal or transfer** of a licence must be made in writing to the Licensing Authority together with the application fee in accordance with the requirements set out below.
- 4.3 There are three separate notice requirements:
1. The applicant must, within seven days after the date of the application, publish an advertisement in a local newspaper circulating in the local authority's area. A suggested form of advertisement is available on request from the Licensing Section.
 2. Where the application is in respect of premises the applicant must display a notice of the application on or near the premises where it can be conveniently read by the public. The notice must be displayed for 21 days starting with the date of application. Again a suggested form of notice is available on request.
 3. The applicant must send a copy of the application to the Chief Officer of Police no later than seven days after the date of the application. Where the application is made electronically it is for the Local Authority itself to send the copy within seven days of receipt of the application.
- 4.4 The application form can be used for grant, variation, transfer and renewal applications. Applicants must provide their name, address, age (where the applicant is an individual), the premises address and the proposed licensed name of the premises.
- 4.5 Applicants must, at the time of submission of a new grant or variation application, provide a scheme showing the exterior design for consideration by the Licensing Authority before the premises are opened for business in order to ensure that exterior design of the premises complies with the Standard Conditions of Licence.

- 4.6 In addition applicants must, at the time of submission of a new grant or variation application, provide a plan showing the interior layout of the premises and where relevant entertainment will take place for consideration by the Licensing Authority.
- 4.7 Applicants for SEVs must also submit a copy of their “club rules” and customer code of conduct. Such club rules must contain the required conduct of performers.
- 4.8 Such club rules will form part of the conditions of licence (if granted) and may be subject to amendment by the Licensing Authority prior to approval.
- 4.9 Applicants must provide evidence to the satisfaction of the Licensing Service of the registration for, and payment of business rates for the premises in question at the time of application.
- 4.9 Officers of the Licensing Service may, as part of the application process, visit the relevant locality of the premises to establish and report on whether there are any characteristics of the locality which may require consideration by the Licensing and Public Protection Committee.
- 4.10 Officers of the Licensing Service may also consult with colleagues from other Departments such as Planning
- 4.11 With regards to online application tacit authorisation does not apply to applications for SEV licences. This means the applicant must wait for the Licensing Authority to determine the application before they can operate a SEV.

5. **Fees**

- 5.1 The 1982 Act permits the authority to set a reasonable fee. Fees for Sex Establishments are reviewed annually by the Licensing and Public Protection Committee and set at a level appropriate to recover the costs of carrying out the licensing function under that Act namely: administration (including any hearings or appeals), inspection and compliance.
- 5.2 The above process is also applicable to the function of licensing SEVs and the appropriate fees for applications can be found on the Council's website at: www.birmingham.gov.uk/licensingfeesandcharges.
- 5.3 Application fees must be paid in full at the time of submission of the application.

6. **Making Objections to Applications**

- 6.1 The 1982 Act permits a wide range of persons to raise objections about the **grant, renewal, variation or transfer** of a SEV licence. Objectors can include residents, resident associations, trade associations, businesses, Councillors (providing they do not sit on the Licensing and Public Protection Committee),

regulatory agencies such as Planning and Environmental Health, or MPs. The Police are a statutory consultee for all applications.

6.2 Objections must be made in writing (email is acceptable) no later than 28 days after the date of the application to the Licensing Authority and should include the following:

- the name and address of the person or organisation making the objection;
- the premises to which the objection relates;
- the proximity of the premises to the person making the objection, a sketch map or plan may be helpful to show this.

6.3 Objectors should limit their objection to matters which are relevant to the statutory grounds for refusal as set out in the 1982 Act. The relevant grounds for objection are:

- That the applicant is unsuitable to hold an SEV Licence;
- That the SEV, if granted would be carried on for the benefit of person/s who would be refused an SEV licence if they had applied themselves;
- That the layout, character or condition of the premises are inappropriate for the proposed SEV;
- That the use of the premises as an SEV would be inappropriate due to the use of premises in the vicinity;
- That the use of the premises as an SEV would be inappropriate due to the character of the relevant locality; and/or
- That the number of sex establishments or sex establishments of a particular type is inappropriate in the relevant locality.

Any objections received by the Licensing Authority which do not relate to the grounds set out in the 1982 Act will be rejected by the Licensing Service.

6.4 The courts have consistently stated that moral objections are inadmissible in such applications and will therefore be rejected.

6.5 Objections will be considered by the Licensing and Public Protection Committee determining the application. The applicant will be informed of any objections received in respect of their application and the objection(s) will become public documents. (However, objector's personal details such as name, address and telephone number will be removed.) A copy of the hearing procedure will be sent to the applicant and any objectors prior to the hearing.

7. Determination of an Application

7.1 **All applications for the grant of a SEV licence will be determined by the Licensing and Public Protection Committee.** Valid objections to any application will be considered by the Licensing Committee or delegated to a Licensing Sub Committee at the hearing to consider the application.

Applicants and objectors will be given an equal opportunity to state their case in accordance with the Licensing and Public Protection Committee's procedure for hearings, which is available from the Licensing Service.

- 7.2 The 1982 Act provides five mandatory grounds and four discretionary grounds for refusal of a SEV licence. Each application for a SEV will be decided upon its own merits and the Licensing Authority will give clear reasons for its decisions. Any decision to refuse a licence **MUST** be relevant to one or more of the following grounds:

7.3 Mandatory grounds for refusal

Specific mandatory grounds for refusal of a licence are set out in paragraph 12(1) (a to e) of Schedule 3 in the 1982 Act. A licence cannot be granted:

- (a) to any person under the age of 18 years;
- (b) to any person who is for the time being disqualified due to the person having had a previous licence revoked in the area of the appropriate authority within the last 12 months;
- (c) to any person, other than a body corporate, who is not resident in an EEA State or was not so resident throughout the period of six months immediately preceding the date when the application was made; or
- (d) to a body corporate which is not incorporated in an EEA State; or
- (e) to any person who has, within a period of 12 months immediately preceding that date when the application was made, been refused that grant or renewal of a licence for the premises, vehicle, vessel or stall in respect of which the application is made, unless the refusal has been reversed on appeal.

7.4 Discretionary grounds for refusal

The only discretionary grounds upon which the Council may refuse an application for the grant or renewal of a licence on one or more of the grounds specified in Schedule 3 paragraph 12(3) are that:

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

8. Suitability of an Applicant

8.1 In respect of 7.4(a) and (b) above with regard to the suitability of an applicant to hold a licence, the criteria for Members to consider include, but are not limited to:

- that the operator is honest
- that the operator is qualified by experience to run the type of sex establishment in question
- that the operator understands the general conditions
- that the operator is proposing a management structure which delivers compliance with the operating conditions e.g. through managerial competence, presence, a credible management structure, enforcement of rules internally, a viable business plan and policies for welfare of performers
- that the operator can be relied upon to act in the best interests of performers e.g. in how they are remunerated, the facilities they enjoy, how they are protected and how and by whom their physical and psychological welfare is monitored
- that the operator can be relied upon to protect the public e.g. transparent charging, freedom from solicitation
- that the operator can show a track record of management of compliant premises, or that he/she will employ individuals who have such a track record.
- Compliance with other regulatory and taxation schemes

9. Suitability of Premises

9.1 The Council would expect that when an application for an SEV licence at permanent commercial property is made, that the applicant will be able to demonstrate that the layout, character and/or condition of the premises is appropriate to the relevant entertainment proposed at the premises.

9.2 The Council would expect that when an application for an SEV licence at permanent commercial property is made, that property should have the appropriate planning consent.

10. Use of Premises in the Vicinity

10.1 In considering the grant, renewal or variation of the licence would be inappropriate to the use which any premises in the vicinity are put, the Licensing Authority shall consider, among other considerations:

- (a) the fact that the premises are sited in a residential area;
- (b) the premises are sited near shops used by or directed to families or children, or no frontages frequently passed by the same;
- (c) the premises are sited near properties which are sensitive for religious purposes e.g. synagogues, churches, mosques, temples;
- (d) the premises are sited near premises or areas which are sensitive because they are frequented by children, young persons or families, including but not limited to educational establishments, leisure facilities

- such as parks, libraries or swimming pools, markets and covered markets;
- (e) the premises are sited near places and or buildings of historical/cultural interest, tourist attractions.
- (f) the premises are sited near civic buildings

11. Character of the Relevant Locality

11.1 With reference to paragraph 8.4(d) 'relevant locality' for the purposes of paragraph 12 of Schedule 3 of the Act means:

- (i) in relation to the premises, the locality where they are situated, and
- (ii) in relation to a vehicle, vessel or stall, any locality where it is desired to use it as a Sexual Entertainment Venue.

11.2 In considering if the grant, renewal or variation of the licence would be inappropriate, having regard to the character of the relevant locality or to the use of which any premises in the vicinity are put, the Licensing Authority shall consider, among other considerations, whether the grant of the application would be inappropriate, having regard to:

- (a) the fact that the premises are sited in a residential area;
- (b) the premises are sited near shops used by or directed to families or children, or no frontages frequently passed by the same;
- (c) the premises are sited near properties which are sensitive for religious purposes e.g. synagogues, churches, mosques, temples;
- (d) the premises are sited near premises or areas which are sensitive because they are frequented by children, young persons or families, including but not limited to educational establishments, leisure facilities such as parks, libraries or swimming pools, markets and covered markets;
- (e) the premises are sited near places and or buildings of historical/cultural interest, tourist attractions.
- (f) the premises are sited near civic buildings

11.3 The Council will consider relevant locality on a case by case basis taking into account the particular circumstances of each case. However, the Council will not seek to define locality as the whole of the Council's administrative area or an entire town.

12. Appropriate Number of Sexual Entertainment Venues

12.1 As set out within paragraph 7.4(c) above, paragraph 12 of Schedule 3 provides that a Local Authority may refuse an application if it is satisfied that the number of sex establishments or sex establishments of a particular kind in the relevant locality at the time the application is made is equal to or exceeds the number which the authority consider is appropriate for that locality. The Council is able to determine that the appropriate number for a locality is nil.

12.2 The Council may choose to set an upper limit guide on the number of SEVs which it considers appropriate in any area within the Council's administrative control. Each application MUST in any event be considered on its merits at the time the application is determined by the local authority.

12.3 The Council considers that the City Centre, being that part of the City which falls within the ring road (A4540) is an area in which it is appropriate to have an upper limit guide on the number of SEVs within it. The Council considers the appropriate upper limit for this area is eight.

13. **Conditions**

13.1 When issuing an SEV licence the Licensing Authority is permitted to issue it on such terms and conditions and subject to restrictions as specified at the time the licence is issued either in the form of conditions specific to the individual or standard conditions applicable to all SEVs.

13.2 The Council has decided to produce regulations prescribing standard conditions and these shall apply to every licence granted, varied, renewed or transferred by the authority unless they have been expressly excluded or varied. These regulations are attached to this policy at Annex A.

13.3 It is an offence to operate an SEV without a licence or contravene a condition of the licence. The maximum penalty upon conviction is £20,000

14. **Renewal Applications**

14.1 Provided an application for renewal has been accepted by the Licensing Service prior to the date of expiry, the licence shall be deemed to remain in force until such time as the renewal is determined by the Council, or the application is withdrawn.

14.2 The statutory requirements for advertising and giving notice, are the same as those applying to initial grants, which are dealt with at paragraphs 5-13. Renewal applications will be dealt with by way of delegated authority to officers, unless there are any objections or other matters of concern, in which case, the application will be heard by the Committee.

15. **Revocation of a Sexual Entertainment Venue Licence**

15.1 A licence can be revoked by the Council at any time on any one of the grounds set out in 7.3(a - e) or any one of the grounds set out in 7.4(a and b) of the policy.

15.2 The Council will not revoke a licence without the licence holder being given an opportunity to appear before the Licensing and Public Protection Committee and be heard.

15.3 Where a licence is revoked, the Council shall give the licensee a statement in writing of reasons for its decision within seven days of the request being

made. Where a licence is revoked its holder will be disqualified from holding or obtaining a licence in the area of the Local Authority for a period of 12 months from the date of revocation.

- 15.4 When the authority revokes a licence, the decision does not take effect until the time for bringing an appeal has expired and if an appeal is brought until the determination or abandonment of that appeal.

16. Cancellation of a Sexual Entertainment Venue Licence

- 16.1 The Council may at the written request of the licence holder cancel the licence.
- 16.2 If a licence holder dies then the licence will be deemed to have been granted to the licence holder's personal representatives and will remain in force for three months from the date of the licence holder's death and will then expire.
- 16.3 The Council can, however, on the application of the licence holder's personal representatives extend the three month period if the Council is satisfied that an extension is necessary for the purpose of winding up the late licence holder's estate. The Council will only do so where there are no circumstances that make such an extension undesirable.

17. Variation of a Sexual Entertainment Venue Licence

- 17.1 A licence holder may at any time apply to vary a term, condition or restriction of a licence or apply to change the location of a licensed vessel. The statutory requirements for advertising, giving notice, consideration by the Council, hearings and the giving of the reasons are the same as those applying to initial grants, which are dealt with at paragraphs 5-12. On receiving such an application, the Council can either:
- (a) make the variation as requested;
 - (b) make such variations as it thinks fit;
 - (c) refuse the application.
- 17.2 The applicant will be given an opportunity to attend a Licensing and Public Protection Committee before a decision is made to make a variation other than that being applied for or to refuse the application.
- 17.3 Where the Council imposes some other term, condition or restriction other than one sought in the variation application, the decision does not take effect until the time for bringing an appeal has expired and if an appeal is brought until the determination or abandonment of that appeal.

18. **Right to Appeal a Decision**

- 18.1 The decisions against which a right of appeal lies are refusals for the grants, renewals, variations or transfers, the imposition of conditions and also revocation.
- 18.2 Appeals must be made to the Magistrates Court within 21 days, starting from the date the applicant is notified of the Licensing Authority's decision.
- 18.3 It is important to note that appeals only lie against the mandatory refusals on the basis that the mandatory ground does not apply to the applicant/licence holder. Further, no appeal lies against the Licensing Authority's decision made on the discretionary grounds set out at paragraphs 7.4(c and d), namely:
- that it is inappropriate to grant or renew a licence on the grounds of the character of the locality or the number of premises in it; or
 - the use of premises in the vicinity or the layout, character or condition of the premises.
- 18.4 The only discretionary grounds against which an appeal lies are those in paragraph 7.4(a and b) relating to the suitability of the applicant, the manager and/or the beneficiary of the operation.

ANNEX A

BIRMINGHAM CITY COUNCIL

STANDARD CONDITIONS FOR SEXUAL ENTERTAINMENT VENUES (SEV)

These regulations are made under paragraph 13(1) of Schedule 3 to the Local Government (Miscellaneous Provisions) Act 1982 (the "1982 Act") as amended by the Policing and Crime Act 2009 (the "2009 Act") to prescribe conditions. In these Regulations, except when the context otherwise requires, the following expressions shall have the following meanings:

- (i) "The Council" shall mean the Birmingham City Council and all enquiries concerning these Regulations and its conditions shall be directed to Licensing Section, Crystal Court, Aston Cross Business Village, 50 Rocky Lane, Aston, Birmingham, B6 5RQ. 0121 303 9896. licensing@birmingham.gov.uk
- (ii) These conditions apply to all premises licensed as a "sexual entertainment venue" as defined by the said 1982 Act that is to say terms, conditions and restrictions on or subject to which licences under Schedule 3 of the 1982 Act are in general to be granted, renewed, varied or transferred.
- (iii) "Sexual Entertainment Venue" ("SEV") means any premises at which relevant entertainment is provided before a live audience, directly or indirectly for the financial gain of the organiser or the entertainer.
- (iv) "Premises" includes any vessel, vehicle or stall but does not include any private dwelling to which the public is not admitted.
- (v) 'Relevant Entertainment' means any live performance or any live display of nudity which is of such a nature that, ignoring financial gain, it must reasonably be assumed to be provided solely or principally for the purpose of

sexually stimulating any member of the audience (whether by verbal or other means).

- (vi) The Council may at any time waive, modify or vary these conditions or impose additional special conditions in any particular case.
- (vii) If the Licensee wishes any of the terms of the licence to be varied an application must be made to the Council.
- (viii) In the event of a conflict between the prescribed conditions and special conditions contained in a SEV licence the special conditions shall prevail.

OPENING HOURS

1. The licensed premises shall not be open or used for the purposes for which the licence is granted except between the hours prescribed within the licence or those hours of operation determined by the Licensing and Public Protection Committee.

WINDOW, FASCIA BOARD ADVERTISEMENT AND DISPLAYS

2. Save for the entrance lobby, the interior of the premises shall not be visible to passers-by and to that intent the licensee shall ensure the area of the premises in which relevant entertainment is offered shall not be capable of being seen from outside the premises.
3. The windows, doors, fascia board, walls and all external parts of the premises including the roof shall not contain any form of writing, sign or display save for:
 - (a) The address of the premises.
 - (b) The licensed name of the premises.
 - (c) A notice stating the opening hours of the establishment.
 - (d) In the case of a licence granted to a body corporate:

- (i) If the premises name is not the same as the full name of the body corporate then such corporate name and;
 - (ii) If the premises are also the body's registered office for the purposes of the Companies Acts then an indication in a form acceptable to the company that such is the case.
- 4. The lettering used in respect of such permitted items shall be of such colour and style as may be approved by the Council.
- 5. The licensee shall not permit the display outside of the premises of photographs or other images, which indicate or suggest that relevant entertainment takes place in the premises.

LICENSED NAME

- 6. At the time of granting the licence in respect of the premises the Council will authorise a name referred to as "The Licensed Name" by which it is intended that the premises shall be known and the licensee shall ensure that the premises are known solely by that name and by no other, save as provided for by the paragraph below.
- 7. To change the licensed name, an application shall be made to the Council not less than 28 days prior to the proposed change and the Council shall have an absolute and unfettered discretion to allow or refuse such change.

EXHIBITION OF LICENCE

- 8.
 - a) A copy of the licence (two pages) shall be suitably framed and exhibited in a position that can easily be read by all persons entering the premises.
 - b) The conditions of licence and all such documents listed as Appendices to said licence shall be retained in a clean and legible condition and immediately available for inspection by anyone who so requests.

9. The licensee shall retain a copy of a form signed by each employee and performer confirming that they have read and understood the licence and conditions. The copy shall be retained for a period of six months after they cease work at the premises. A copy of the licence and conditions shall be given to each performer.

RESPONSIBILITY OF THE LICENSEE

10. The licensee or a responsible person over 18 years of age nominated by them in writing for the purpose of managing the SEV in their absence shall be in charge of and upon the premises during the whole time they are open to the public.
11. The written nomination referred to in condition 10 above shall be maintained in a daily register, kept on the premises and made continuously available for inspection by an officer authorised by the Council or police officer.
12. The person in charge shall not be engaged in any duties that will prevent them from exercising general supervision and they shall be assisted as necessary by suitable adult persons to ensure adequate supervision.
13. The licensee must ensure that there is a current insurance policy in force to cover the performers whilst the premises are open and that a copy is displayed in areas where all staff have access.

EMPLOYEES AND MANAGEMENT STAFF

14. The licensee shall keep and maintain at the licensed premises a written record of the names, addresses, and copies of photographic proof of age documents of all persons employed or performers permitted to operate within the licensed premises whether upon a full or part time basis and shall, upon request by an authorised officer of the Council or police officer, make such

records available for inspection to them. (see Conditions regarding Door Supervisors)

15. Condition 14 does not relate to persons engaged to carry out repairs or provide services from external companies to the premises, however, such persons must be aged 18 years and over if the premises are open for the purpose of providing sexual entertainment.
16. The licensee shall ensure that all persons employed or permitted to work within the licensed premises hold the appropriate rights to work and shall keep copies of any documentation used to verify the details of these rights where necessary.
17. The licensee shall maintain a register of the names, addresses and dates of birth of such person or persons (whether employees or otherwise connected with the business) who have authority to manage the premises in the licensee's absence.
18. Where the licensee is a body corporate or an unincorporated body any change of director, company secretary or other person responsible for the management of the body is to be notified to the Licensing Authority

CHANGE OF LOCATION AND ALTERATIONS TO PREMISES

19. Where the licensed premises is a vessel or stall, the licensee shall not move the licensed vessel or stall from the location specified in the licence unless a variation application is submitted for the Council's determination giving not less than 28 days notice. n.b. this requirement shall not apply to a vessel or stall which habitually operates from a fixed location but which is regularly moved (whether under its own propulsion or otherwise) from another place such location as is specified in the licence.
20. Alterations or additions, either internal or external and whether permanent or temporary, to the structures, lighting or layout of the premises as shown on

the plan, including any change in the permitted signs on display shall not be made except with the prior approval of the Council.

CLUB RULES

21. Any club rules imposed on the performers shall be displayed in a prominent position within the premises for all employees to have easy access whilst at work.
22. A copy of the club rules shall be provided to performers engaged by the premises by means of a written contract signed by the recipient. Copies of the same must be retained on the premises and produced to an authorised officer of the Council or police officer on request.

FEES

23. Receipts or records of payments received should be provided to performers where "house fees" are charged or when any fines are issued.

PERFORMANCES

24. No person under the age of 18 shall be permitted to be on the licensed premises when sexual entertainment is provided. A notice shall be clearly displayed at the entrance to the premises in a prominent position stating that "No person under 18 will be admitted when sexual entertainment is being provided" so that it can be easily read by persons entering the premises.
25. Each area where relevant entertainment is conducted shall be supervised and/or contain a panic alarm for the safety of performers.
26. A customer code of conduct shall be prominently displayed in each area to which the public are admitted.
27. Performers shall be aged not less than 18 years.

28. Full nudity is only permitted in the approved designated areas, as stipulated or shown on the approved plan attached to the licence. In all other public areas within the premises the performers and employees must at all times wear at least a G string (female) and or pouch (male) covering the genitalia
29. During all performances (including performances usually termed 'private dances') there must not be any deliberate contact, by the performer, with any patron or person within the audience except:
- a). Leading a patron by the hand to and from a chair or private room or designated dance area.
 - b). Simple handshake greeting at the beginning and/or end of the performance.
 - c). A customary ("peck on the cheek") kiss at the end of the performance.
 - d). the placing of monetary notes or dance vouchers into the hand or garter worn by the performer.
30. No performances shall include any sex act involving any other persons or objects (or involve any form of auto-erotic stimulation).
31. A price list shall be displayed in a prominent position giving the price and the duration of any 'private dances'.
32. Any person employed to supervise or attend to the exterior or entrance area of the premises must, at all times be suitably and sensibly dressed so as not to indicate or suggest the nature of the relevant entertainment taking place at the premises.
33. No fastening or lock of any description shall be fitted upon any booth or cubicle or other area within the premises except as shown on the plan; within the toilets, within the performers' dressing rooms and/or staff areas.

- 34. At all times during a performance, performers shall have unrestricted access to a dressing room.
- 35. Patrons or members of the audience shall not take photographs or record digital images of performers within the premises via a camera or mobile phones

DOOR SUPERVISORS

- 36. The licensee shall ensure all door supervisors employed or contracted to work on the premises are suitably licensed by The Security Industry Authority or appropriate agency.
- 37. Where door staff are used, the licensee shall maintain profiles for all door staff that are, or have been, working at the premises in the last six months. The profile is to contain proof of identity (copy of passport /photo driving licence) and proof of address dated within the last six months (bank statement /utility bill). Separate proof of address is not necessary when the proof of identity is a photo driving licence. All profiles are to be made immediately available to Authorised Officers upon request.
- 38. An adequate number of licensed door supervisors, based on a risk assessment undertaken by the licensee, shall be on duty on the premises whilst relevant entertainment takes place.
- 39. At least one door supervisor shall be on duty at the premises at all times when the relevant entertainment takes place.

CCTV

- 40. CCTV shall be installed in each room within the premises where the public has access save for the toilet and staff only areas. All cameras shall continuously record whilst the premises are open to the public and recordings shall be kept available for a minimum of twenty-eight days.

- 41. A member of staff who is fully trained in the use of the CCTV system shall be on duty at all times when the premises are open until the premises are clear of customers.
- 42. The premises will provide copies of any recordings upon request by a police officer or an authorised officer of the Council within 24 hours of the request.

TOUTING FOR BUSINESS AWAY FROM THE PREMISES.

- 43. The licensee shall not allow the use of vehicles including limousines for the promotion of the relevant entertainment.
- 44. The collection of patrons and or potential clients is not permitted unless the vehicle is licensed in accordance with the provisions of the Local Government (Miscellaneous Provisions) Act 1976.
- 45. The licensee shall not permit any person whilst on a public thoroughfare to encourage any other person to visit the SEV premises by any means.
- 46. The licensee shall endeavour to ensure any marketing communications associated with the SEV or relevant entertainment shall comply with the code of practice as issued by the Advertising Standards Authority.

ADMISSION OF AUTHORISED OFFICERS

- 47. Officers of the Council, Police, and other authorised agencies who are furnished with authorities (which will be produced on request) shall be admitted immediately to all parts of the premises at all reasonable times and at any time the premises are open for business.

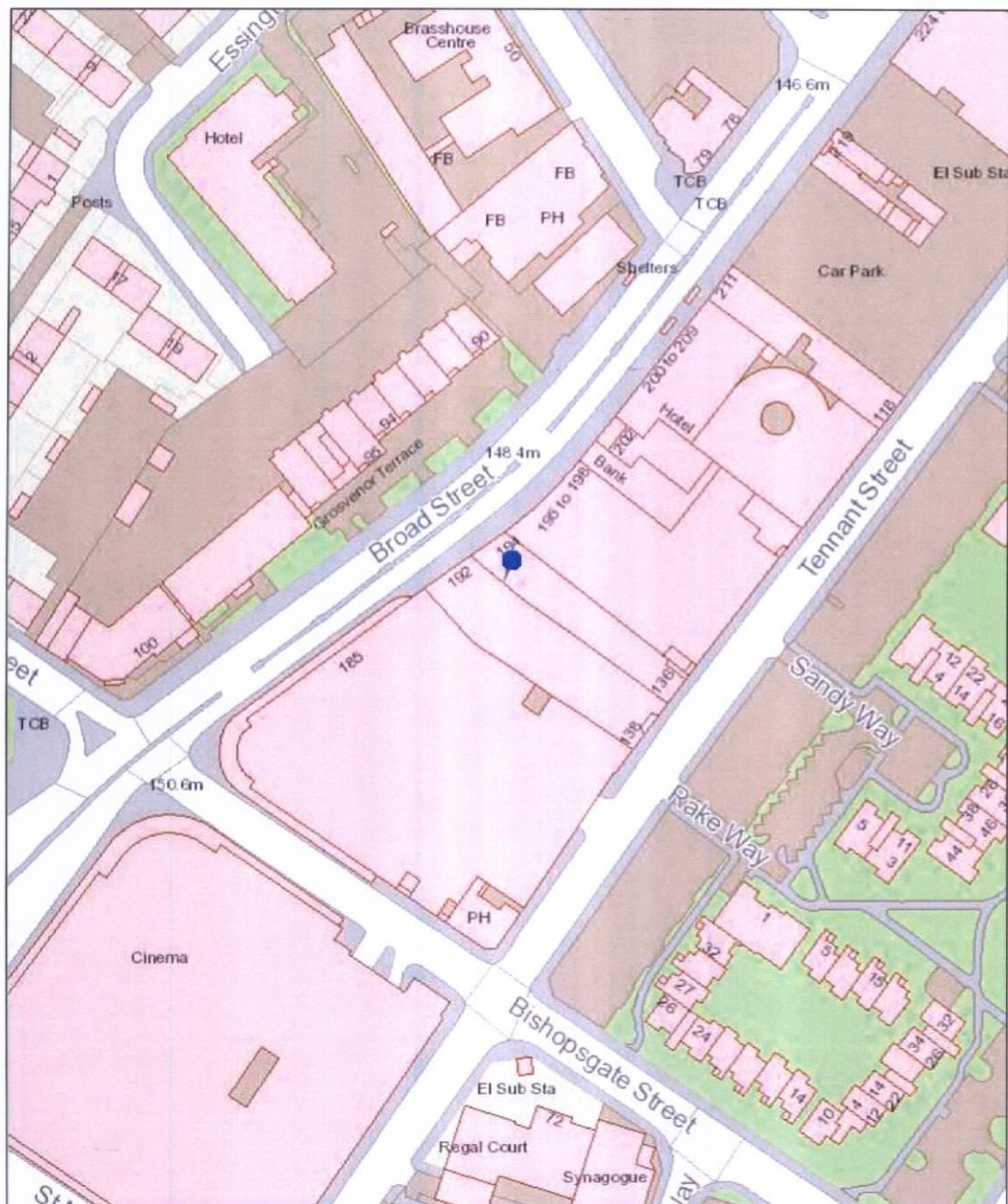
ANNEX B

SCHEME OF DELEGATION OF DECISION-MAKING AND FUNCTIONS

The Licensing and Public Protection Committee is responsible for making licensing decisions with Sub-Committees and officers having delegated powers to make some decisions. The table below describes how licensing decisions will be made. This scheme of delegations will be subject to regular review

Nothing within this scheme of delegations shall prevent matters being referred to a higher level where appropriate. E.g. officers may refer matters to a sub committee, or a sub-committee may refer a matter to full committee.

Matter to be dealt with:	Decision to be made by:		
	Full Committee	Sub-Committee	Officers (Senior Licensing Officer or above)
Application for grant or transfer	All cases		
Application for renewal or variation	If relevant objection made		If no relevant objection made
Minor variation application	If relevant objection made		If no relevant objection made
Revocation of Licence	All cases		
Cancellation of Licence			All cases
Make/amend regulations prescribing standard conditions, terms and restrictions	All cases		
Setting of fees	All cases		
Waiver	All cases		
To make and amend policy relating to the licensing of sex establishments	All cases		
To enforce the provisions of Part II and Schedule 3 of the Local Government Miscellaneous Provisions Ac 1982			All cases



Birmingham City Council

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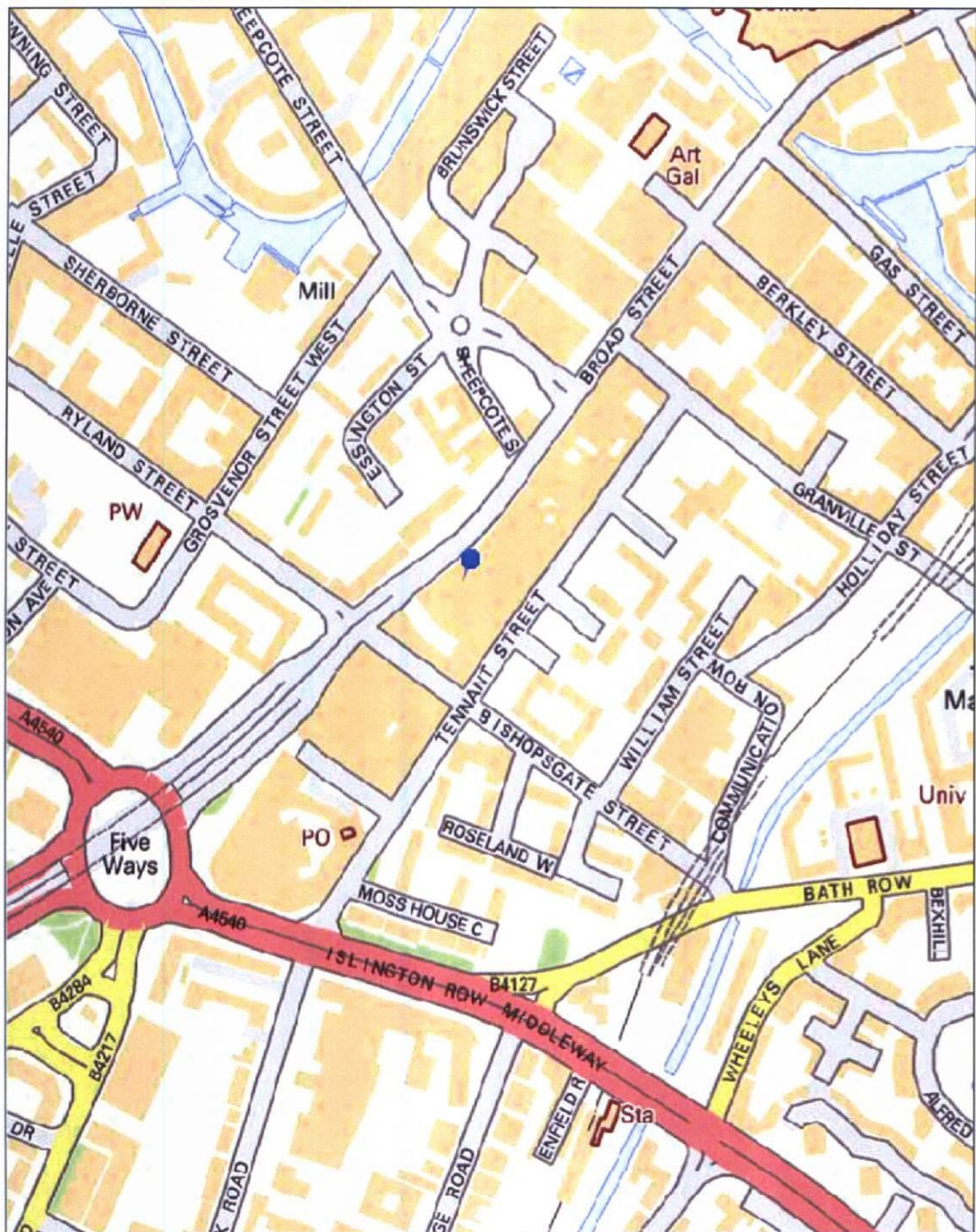
Notes

Date of Map Creation: 22/02/2019



Scale:
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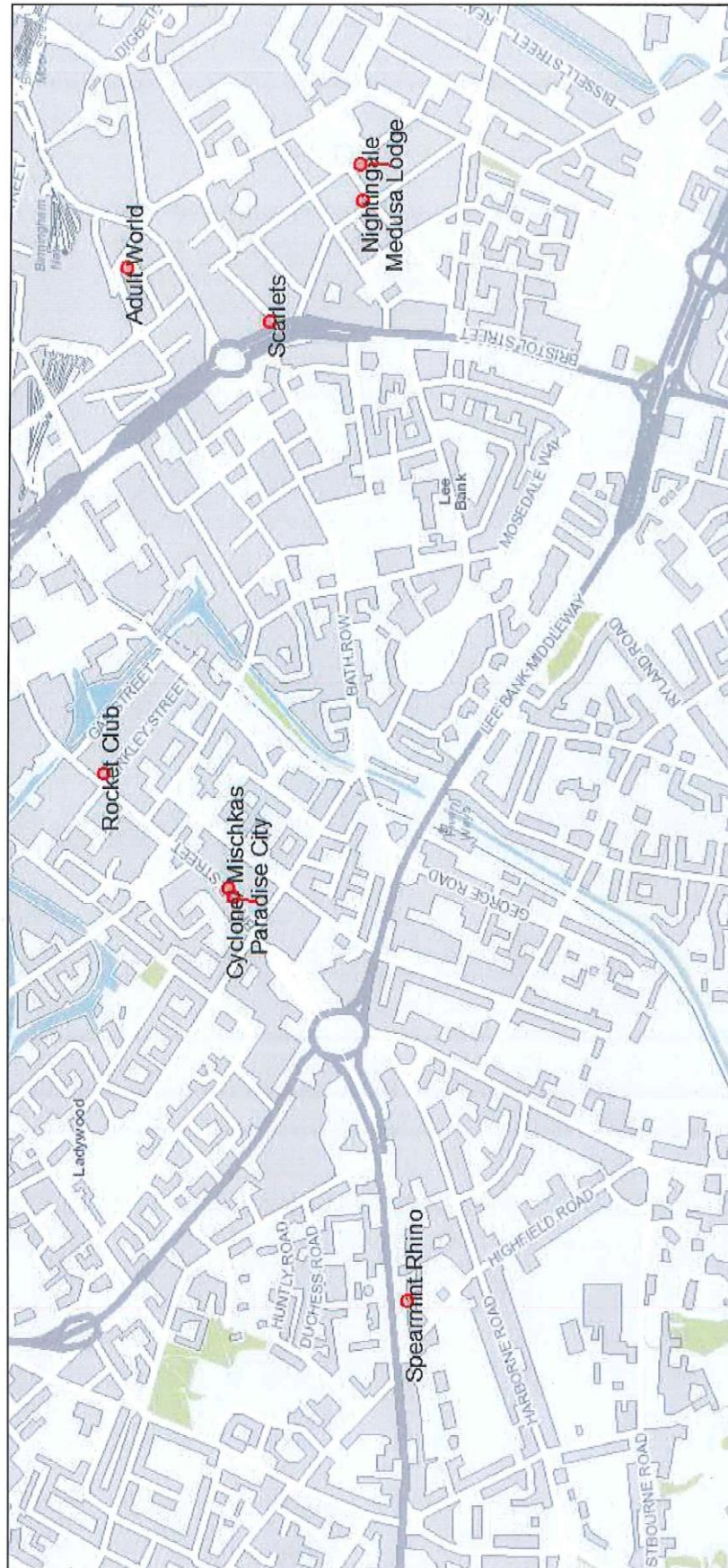
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ENCLOSURES FOR PARADISE CITY

SECTION A:

Reports & Witness Statements:

- i. Andy Bamber, AB Conformitas Ltd
 - a. Environmental Audit
 - b. Photos
- ii. Gary Brown
- iii. Daniel Parma
- iv. Ruxandra Niculescu
- v. Zviad Tsiklauri

SECTION B: Supporting Documents

Tab 1: Broad Street: Location & Other Businesses

- 1.1 Map & List of Businesses
- 1.2 Photos

Tab 2: Proposed license conditions

- 2.1 Proposed licence conditions

Tab 3: Paradise City Policies

- 3.1 Proposed Management Structure
- 3.2 Etiquette & Club Rules
- 3.3 Policies & Documents
- 3.4 Risk Assessment
- 3.5 Transaction Acknowledgment Form
- 3.6 Training Questionnaire

Tab 4: Curriculum Vitaes:

- 4.1 Gary Brown
- 4.2 Andy Bamber
- 4.3 Ruxandra Niculescu
- 4.4 Zviad Tsiklauri

Tab 5: Personal Documents Gary Brown:

- 5.1 DBS Certificate
- 5.2 Personal License
- 5.3 Personal license card
- 5.4 BII level 2 certificate

Tab 6: Personal documents of Danny Parma;

- 6.1 Birth Certificate
- 6.2 Personal License & SIA license
- 6.3 DBS certificate

Tab 7: Personal Documents of Ruxandra Niculescu & Zviad Tsiklauri:

- 7.1 Personal license
- 7.2 Professional certificates (Level 3 Mortgage Advice Certificate, Restaurant & Hospitality & Management Diploma)
- 7.3 SIA certificate Ruxandra Niculescu
- 7.4 SIA certificate Zviad Tsiklauri

Tab 8: Companies House information:

- 8.1 Companies House documents

SECTION A:

REPORT:

REPORT ON THE MATTER OF AN APPLICATION BY PARMA (MIDLANDS) LIMITED FOR A SEXUAL ENTERTAINMENT VENUE LICENCE IN RESPECT OF PREMISES AT 193-194 BROAD STREET, BIRMINGHAM BY ANDY BAMBER OF AB CONFORMITAS LTD.

Andy Bamber, AB Conformitas Ltd	Report
Appendix i	Environmental Audit
Appendix ii	Photos

AB Conformitas Ltd

**REPORT ON THE MATTER OF AN APPLICATION BY PARMA (MIDLANDS) LIMITED FOR A SEXUAL
ENTERTAINMENT VENUE LICENCE IN RESPECT OF PREMISES AT 193-194 BROAD STREET
BIRMINGHAM**

Dated March 2019

1. I have been asked by Peter Adkins of Emms-Gilmore-Liberson Solicitors, to provide an assessment of a licence application made by Parma (Midlands) limited to open a venue called Paradise City as a Sexual Entertainment Venue.
2. I am aware that the application refers to a premises in Broad Street, Birmingham and that the venue previously operated as a sexual entertainment venue known as Legs 11. I have had no contact or involvement with the previous club called Legs 11.

Personal summary

3. I was a police officer in the Metropolitan Police and retired in January 2007 with 34 years of exemplary service. Throughout my service I have been regularly involved in the enforcement, management, and development of licensing initiatives and policies. I retired as a Borough Commander having managed two London Boroughs.
4. As a constable I worked as an undercover officer detecting offences in late night licensed premises in central and west London. As an Inspector I was the Licensing Inspector for a very busy inner London policing division.
5. Whilst working as a Chief Inspector I was the operations manager in the central London Clubs and Vice unit from 1990-1996. As part of this role I had responsibility for late night licensing in Westminster and I supported other London boroughs as appropriate. During this period, I managed both covert and overt police operations on behalf of the police and the local authority to ensure compliance with the legislation and to prosecute breaches where necessary. The overt licensing visits were structured in a way that ensured that all premises operating with late night licences received at least 4 visits a year from a joint licensing team of police officers and local authority officers. It was during this period that I was involved in the development of the initial licensed door supervisor's scheme, commissioned by Westminster City Council, which was implemented and managed by myself within the Clubs and Vice unit. During the same period I researched, with a local authority counterpart, the

potential for the introduction of 'Lap Dancing' clubs in Westminster. The work resulted in the introduction of 'lap dancing' establishments in the borough. The initiative and the supervision of the licence was then monitored covertly and overtly by officers under my direction.

6. As Detective Superintendent I was a senior investigating officer in the Metropolitan Police anti-corruption command investigating police corruption and serious incidents that presented a risk to the reputation of the organisation.
7. As a Borough Commander on 2 London boroughs, between 2001 and the beginning of 2007 (January), I worked with both local authorities to develop the respective licensing and enforcement policies. The work with the Local Authority formed a significant part of Community Safety and local policing plans. With the introduction of the new Licensing Act 2003 I oversaw the transfer of responsibilities to the local authority and was instrumental in setting up a joint licensing team for a busy inner London borough.
8. I have also represented HM Government overseas working in foreign missions, and I was a Public Order Commander trained in crowd management and crowd control.
9. In 2007 having retired from the police I was employed by an Inner London Local Authority as an Assistant Director for Safer Communities. I held this post for 10 years.
10. When working for the Council I had responsibility for a wide ranging Safer Communities portfolio that included the Council, and the Partnership Crime Reduction Strategies. The role included the Council's enforcement function, all licensing functions including the development of Licensing policies and enforcement policies, Environmental Health, Trading Standards, the Drug and Alcohol Team, CCTV, Corporate Health and Safety, and Emergency Planning and Civil Contingencies, and many more corporate services and corporate roles.
11. My work involved comprehensive partnership working with all agencies involved in the crime reduction partnership, problem solving local hotspots and environmental audits with the associated action plans. Amongst the many roles I had responsibility for the Council's night time economy and the impact that it had on communities. In this role I worked closely with the local policing teams to ensure that licensed premises were effectively supervised and managed in line with local initiatives, the licensing objectives, and the borough licensing and enforcement policies. As the principal officer for licensing in the local authority I worked closely with local community groups, ward councillors, and members of the licensing

committee to develop knowledge and understanding of local partnership enforcement policies, and crime and disorder initiatives linked to drugs and alcohol.

12. I delivered a structured approach to licensing management, supervision, and enforcement, the Council's Community Safety Plan, the Enforcement Policy, and the Licensing Policy. My role also included the consultation, development, and delivery of the boroughs controlled drinking zone, cumulative impact zone, Sexual Entertainment Venues, late night levy, early morning restriction orders, Best Bar None, and alcohol treatment programmes.
13. On my retirement from Local Government I set up my own compliance consultancy and I now offer independent advice, environmental audits, and compliance audits and risk assessments for licensed premises. The compliance visits are both overt and covert.
14. I have a Masters Degree in Business Administration, I am a member of the Institute of Licensing and I have Personal Licence.
15. I have also been trained in Strategic Emergency and Crisis Management (Cabinet Office EPC), Emergency Control Management (Cabinet Office EPC), Gold Support London Emergency Planning (LLAG), and I was an Authorising Officer for Covert surveillance.

Compliance visits (Covert and Overt)

16. Whilst I personally undertake overt compliance visits I have a number of associates that conduct the covert visits on my behalf to ensure that owners and management have no way of identifying the covert customer during the visit. The time and day of both overt and covert visits is not notified to the owner beforehand.
17. The structure of the overt visit is identical to the types of supervision inspections that are undertaken by police and licensing enforcement officers, looking at and testing the conditions on the respective license. The covert compliance visit is the same as 'test purchases operations' conducted by police forces and Trading Standards Services across the country. It is also similar to 'mystery shopping exercises' conducted by many organisations and businesses to test their employees' compliance with their company rules and policies.
18. The visits are commissioned by the owners of establishments who wish to ensure that due diligence is part of the operating schedule, and with the intention to provide assurance to

the Licensing Committee that they are responsible individuals that focus on the promotion of the 4 Licensing Objectives and the conditions set on their licence. In one case the Local Authority stipulated, as a licence condition, the introduction of independent compliance visits with the report being sent directly to the police and council officers. After 6 months of compliance visits and slight readjustments the owners were able to reapply to the Licensing Authority for a variation and reduce the frequency of their visits because the concerns of the licensing officers and the police had all been satisfactorily managed and dealt with.

Experience with Sex Entertainment Venues

19. I have worked extensively with proprietors of premises that operate with Sexual Entertainment Venue Licences within the City of Westminster, other London Boroughs, and along the M4 corridor. I have helped to re-engineer the operating schedule and compliance regimes of Sexual Entertainment Venues to ensure that the police and local licensing officers have confidence that the venues operate to high standards of compliance, completely in line with the conditions of their licences and that they focus on the welfare of their entertainers.
20. A number of the venues I have worked with have been in cumulative impact zones and I have been able to address the concerns of local authorities and the police to ensure that the four licensing objectives are not adversely affected, that any policy adopted by a venue is fit for purpose, and that the process to manage the policy is transparent and effective.
21. At a number of venues I have completely redesigned how the proprietors manage and supervise their establishments to the satisfaction of the Licensing Authority and local council enforcement officers, and police licensing officers. In addition to the compliance and environmental audits for venues I risk assess the four Licensing Objectives for each venue along with the conditions set by the Licensing authority. The risk assessments identify potential areas of risk with the management and compliance of the conditions that would be of concern, and would be a risk to the owner if left unchallenged. The assessments provide a due diligence test for the owner, it enables them to develop welfare policies for their performers, correct management practices and/or introduce additional measures. Such assessments can be conducted at 6 monthly intervals or annually.
22. In the areas that I have worked the risk assessments have provided assurance to the Licensing Authority that the proprietors of Sexual Entertainment Venues have an effective due diligence test in place.

Objections to Sexual Entertainment Venues

23. From time to time, objections are made to Sexual Entertainment Venues on grounds of location, crime, disorder, and public nuisance.

In my experience, especially working with the number of venues with SEV licences that I currently work with, I find that venues tend to be located in areas that already have a vibrant night life, and they function as an additional offer in the wider night time economy. The difference is that Sexual Entertainment Venues do not contribute in any significant way to crime, disorder, and public nuisance. This is primarily because of the nature of the offer itself, the clientele they attract, the effective regulatory framework within which they operate, and the range of operating conditions placed upon them by the Licensing Authorities. All of which are apt to control the impact of the premises on their environment in ways going beyond controls placed on other types of premises.

24. Unlike casinos, cinemas, night clubs, traditional public houses, large themed drinking venues and other night time economy outlets Sexual Entertainment Venues have very unobtrusive facades. They do not have bright garish lighting to attract people, unlike the rest of the night-time entertainment industry. The frontages are plain and innocuous. People passing such premises cannot see into the venue unlike other night-time venues and there is no advertising or images on or near such a venue, or any other form of publicly displayed notice (other than a website) that depicts the type of entertainment on offer at such places. The only obvious signs tend to be a rope across the entrance and a door supervisor standing just inside the venue. In the many environmental audits that I have carried out I have watched the pedestrian footfall walk past venues without noticing them. I have also seen customers walk along the road trying to identify the location of the venue because it was not obvious.
25. Themed drinking venues and night clubs tend to attract larger volumes of people and as a consequence large and often noisy groups gather outside venues queuing to enter. Throughout the evening and night these venues regularly decant large groups of intoxicated customers back into crowded public space, leading often to a mass exodus at closing time. In Sexual Entertainment Venues, there is no mass exodus, both because footfall tends to be lower and because the clientele does not stay until the end of the entertainment in any case.

26. Crowds and queues for night-time economy venues can often be noisy if customers have been 'pre-loading' or drinking in other venues before moving to other late night establishments. This tends to happen later in the evening when the local ambient noise starts to die off and the noise is directly attributable to certain night time venues that even become more apparent. This is not a feature of Sexual Entertainment Venues that operate in the night time economy. Queues are not a feature of Sexual Entertainment Venues and as a consequence there is no elevation in street noise or disorder associated with the venue and its customers.
27. Significant high levels of intoxication are not normally attributable to Sexual Entertainment Venues, unlike other premises that operate at the same times in the same night time economy. Individuals that go to Sexual Entertainment Venues are not primarily interested in alcohol. People go to Sexual Entertainment Venues for the purpose of paying for the entertainment that is being provided, and alcohol consumption is an ancillary element to the evening. In addition, the pricing tariff in such venues tends to be higher than the average pub or themed drinking venue and there is no advertising offering cheap or discounted alcohol to entice customers into the venue.
28. The customer is also paying for the in house entertainment. Entertainment costs are not levied by other businesses operating in the night time economy.
29. In the main customers that frequent Sexual Entertainment Venues tend to be older than the average club goer.
30. Sexual Entertainment venues are not generally identified as clubs of interest for the student population, and in any case the cost of an evening in a Sexual Entertainment Venue is far in excess of the means of the general student population.

Paradise City

31. My involvement with the owners of the applicant company has been regarding legal compliance, and in particular:
 - a. the Information Commissioners Office requirements under the Data Protection Act, the General Data Protection Act Regulations, and the HRA;
 - b. a CCTV policy to meet the needs of running a Sexual Entertainment Venue;
 - c. risk assessment;

- d. the venue's policies and how to manage the processes that underpin the effectiveness of such policies;
- e. conditions going beyond those set out in the Birmingham City Council Sexual Entertainment Venue Policy.

In addition, I have also attended a meeting with the Council's Licensing Department with Mr Gary Brown where additional conditions were discussed.

Objections to the Application

32. I have read the objections to the application for a Sexual Entertainment Venue Licence and Premises Licence (under the Licensing Act) at 193-194 Broad Street that would operate as a venue called Paradise City. The three objections that I have read fall into the following main areas of concern
- The location of the venue.
 - The operating conditions and policies.
 - Mr Parma's involvement.
33. I shall deal with each of these areas of objection in turn.

Location

34. Having considered this objection I conducted an Environmental Audit of the area in which the proposed Paradise City would operate. To this end, I visited Broad Street and its environs on Saturday 2nd February conducting a visual audit from approx 7.30pm through to approx 2.30am.
35. I have no doubt at all that the Committee will be very well aware of the general and specific locality. My environmental audit is therefore dealt with as an appendix to this report.
36. My clear conclusion is that Broad Street is a very lively night time economy area, with the main environmental impacts driven by the alcohol-led venues along the street.
37. From my observations, the existing Sexual Entertainment Venues have a negligible impact on the night time environment, being visually unobtrusive, quiet and with no contribution to

alcohol related nuisance, crime or disorder. This entirely accords with my experience of such venues over many years and in a number of large and small local authority areas.

38. There were two distinct types of premises operating in Broad Street:
- A. The clubs and large themed drinking venues that were bright, had large bright signage outside, they were noisy with amplified music all audible at a distance from the venue. They were frequented by large numbers of intoxicated customers and had large queues outside. Intoxicated customers leaving the venues contributed to the anti-social behaviour in the area.
 - B. The other smaller number of venues were quiet, unobtrusive, had no queues attached to them and were not contributing to the overall nuisance factor in the street. These venues included the two Sexual Entertainment Venues that had bland frontages with no garish lighting, and no advertising, no loud music, no queues, and no apparent intoxicated customers leaving the venues.
39. I have already set out at paras 23-30 the contributing factors that create such an environment for SEV's and why they are most unlikely to add to the crime and anti-social behaviour in any given area.
40. Given that the proposed Paradise City would operate under the same, if not tighter, conditions than the two established Sexual Entertainment Venues that currently exist in Broad Street I saw nothing that would indicate that the existence of another Sexual Entertainment Venue would adversely impact upon the environment or its character or impinge in any material or harmful way on any nearby uses.
41. As I understand it, the existing SEVs are well-established and there has not previously been objection to the renewal of the Legs 11 premises on these grounds. Venues of this nature typically slot into busy, vibrant night time areas of the sort seen in Broad Street where they satisfy a market demand for the activity and add to the diversity of the night-time offer without impacting harmfully on other interests of acknowledged importance. I have no doubt that Paradise City, properly run, would operate without a significant impact on the amenity or character of the locality.

Proposed Conditions and Management of the Venue

42. I believe that each application for a Sexual Entertainment Venue Licence should be based upon a sound risk assessment so that additional conditions, going beyond the licensing authority's standard conditions, are placed on each licence as are deemed appropriate and proportionate for each individual case. This is because the style, location and in some cases the history of each premises can vary considerably.
43. I have considered the specific needs of the proposed premises, having visited it on 2 separate occasions to assess the operating environment and I have bench marked it against other venues that I have worked with. I have also considered the objections raised, and the discussions with The City Council on the 14th December, at which I was present. I have also discussed matters with Mr Brown and reviewed the licence conditions for the two existing Sexual Entertainment Venues in Broad Street
44. Whilst the proposed venue is not operating as a Sexual Entertainment Venue I have conducted a visual audit of the building and looked at the standard SEV conditions.
45. In this case, there has apparently been a history of non-compliance. To a large extent, this concern can be ameliorated by the fact that the staff and door security will be subject to much more training, scrutiny, and control. In addition, the day to day management will be different as I am confident that Mr Brown will be an effective Designated Premises Supervisor. This process has served to highlight to him the importance of compliance and the seriousness that the Licensing Authority view poorly managed venues. The only point of connection with the past is Mr Parma himself, who is not to have any day to day management of the premises.
46. Nevertheless, in order to provide still greater assurance, I have recommended the list of conditions in the bundle, in addition to the standard conditions on SEV licences. The list is a relatively long one, and includes conditions recommended by the company's legal advisers, and which I endorse, as well as conditions which I would have in any event recommended. The complete list represents an extensive matrix of control.
47. It is also essential to develop a culture of zero tolerance to licence breaches and a due diligence framework is a key aspect for management. All staff must be empowered to

intervene if they see a breach or an act that is, or likely to result in, a breach, Entertainers and customers must be clear what the house rules are and that any breach of the conditions will result in a sanction. Equally all staff must be aware of the SEV conditions and the underpinning policies and procedures.

48. I shall deal briefly with some of the additional conditions suggested as follows.

(i) Personnel and training (conditions 2 - 8) & (36) Compliance Audit

49. There are clear and understandable concerns about the involvement of any person who worked in Legs 11, having any management involvement in Paradise City. The importance and the impact of 'culture' and how it affects a business should not be underestimated and therefore the management of staff and the setting of standards is a key aspect in achieving a zero tolerance environment in licensed premises throughout the late night entertainment industry.
50. The removal of Mr Parma from the day to day management of the venue, and the enhanced training of the Designated Premises Supervisor are essential elements in developing a zero tolerance culture/environment.
51. Having met Mr Gary Brown and discussed the operating environment with him I feel sure that, as an individual, he is more than capable of managing the venue as a Designated Premises Supervisor. However, although it is not a legal requirement, if Mr Brown, and any person that is likely to deputise in his absence, attends the BII Level 2 Award for Designated Premises Supervisors there will undoubtedly be an enhanced level of awareness and management capability at this particular venue.
52. In addition, the whole application process to date has been insightful for Mr Brown and served to be an excellent piece of learning. He has developed an acute understanding of the responsibility placed upon a Designated Premises Supervisor of a Sexual Entertainment Venue Licence. He also appreciates the importance of zero tolerance and compliance, and the seriousness with which the Licensing Authority view failure, elements that can never be effectively conveyed in the classroom of a Licensing Course.

53. By adding an independent oversight structure into the due diligence process, with reports that are readily available to authorised officers, reinforces and ensures that management understands the importance of compliance and zero tolerance.

(ii) CCTV Conditions 9 through to 16

54. The installation of a good quality CCTV system, and the implementation of effective policies offers a number of benefits, if used correctly. It offers the opportunity to enhance the welfare and safety of the entertainers and provides management with a supervision instrument to ensure compliance. If sufficiently overt it serves to remind and reinforce the house rules and compliance by customers, staff, and entertainers. It ensures good identification of individuals and provides quality evidence which in turn reduces investigation times and ensures cost effective prosecutions.
55. The use of computer tablets linked to the CCTV system provides management and staff with the ability to effectively monitor the entire environment even when moving around the venue. Constant monitoring allows for early management intervention if there is concern about a customer or the behaviour of an entertainer.
56. The provision of a protected CCTV viewing platform in the reception area for authorised officers ensures that any officers conducting licensing visits have almost immediate access to the system without having to find the DPS and then negotiate 2-3 floors of the building.
57. Problems inside and outside Sexual Entertainment Venues are most uncommon, unlike clubs, pubs, and large themed drinking venues. However, door staff with radio systems that are linked to the DPS and other managers serve as a reminder to those entering the venue are entering a highly regulated and supervised environment.
58. The current standard condition to retain footage for 28 days is slightly out of kilter with ICO guidance. The suggested condition to retain footage for thirty days is a slight enhancement. That, along with the provision of computer tablets to improve supervision, and the requirement to 'dip sample' footage and record what has been seen and the action taken, if required, will be a significant enhancement of the CCTV conditions.

(iii) Performers, performances and pricing (conditions 17-33)

59. Many entertainers that work in Sexual Entertainment Venues are transient, having worked in clubs locally, at other locations in the United Kingdom, and abroad. Consequently they will have worked in establishments with a variety of different house rules and performers codes of conduct. In addition, depending on the management controls, the conditions will have been applied to differing standards.
60. It is essential that each entertainer goes through an induction process where the codes and policies are made clear, this should include all safety policies, and it is imperative that they understand each and every one.
61. Entertainers in most Sexual Entertainment Venues are relatively unsupervised apart from when they are on the entertainment floor, where they supervised by security staff and management. The employment of a 'House mother' ensures the welfare of the performers, provides security and support, reinforces the house rules, and provides a valuable level of extra supervision.
62. At the meeting with officers on the 14th December the officers expressed their concern about the payment methods in the former establishment. Therefore, the additional conditions that relate to payment for entertainment should allay their concerns.
63. Officers also voiced concern about the VIP room on the second floor of the venue that is away from the main entertainment area, and I understand their concern. The room itself does not represent a risk if it is managed and supervised correctly. The computer tablets providing the remote capability to monitor the venue through a CCTV portal and the CCTV viewing platform in the reception area provided for authorised officers seeks to address their concerns.
64. The additional conditions in this section also seek to develop;
- The zero tolerance culture,
 - Enhance the safety and welfare of the entertainers,
 - Ensure that customers are absolutely aware of the rules of the venue and that non-compliance is not tolerated.

(iv) Drugs (Condition 34)

65. Drug use and supply should be a key concern for every business operating in the night time economy and the procedures adopted should be agreed and signed off by the police, especially in relation to seizure and retention.

66. The random searching of staff and their facilities provides extra reassurance for management and the authorities. The employment of a 'House Mother' as indicated at condition 35, ensures that entertainers are aware that they and the changing facilities are subject to scrutiny.

(v) Recording of incidents (Condition 35)

67. The use of an incident log provides a useful record for management about incidents in the venue if they are later challenged by the authorities or customers that have been to the venue. It provides an easy cross reference to CCTV footage and aids any investigation by the police, licensing officers, or management.

(vi) Compliance audit (Condition 37)

68. I have worked with other local authorities and Sexual Entertainment Venues where regular audits (compliance visits) are undertaken in the venue, both overtly and covertly by independent individuals.
69. These compliance visits are in two-forms, overt and covert visits. The overt visits are similar to the overt licensing visits undertaken by the police and licensing officers. The covert visits or 'test purchases' are also the same as those conducted by police forces across the country or 'mystery shopping exercises' conducted by many organisations and businesses to test their employees' compliance with their company rules and policies. The visits are arranged on a date and time without the prior knowledge of the owners or management team.
70. In some cases the audits are undertaken specifically for the management as part of their due diligence and annual risk assessment process. In a number of venues that I work with the compliance visits are part of the conditions on the licence. In these cases a copy of the visit report is provided to the licensing officers.
71. The unannounced or impromptu overt visits will always include a 'dip sampling' of the CCTV footage on random dates and times to assess compliance.
72. In this case, because of the history, I would advise regular audits, followed by less frequent audits if the venue trades without harm before the first licence renewal. I will be pleased to

conduct such audits and ensure that my audits are made available to the licensing authority and police, if requested.

Mr Daniel Parma's involvement in the venue.

73. I cannot make any comment about the previous history of the venue, formerly known as Legs 11, or Mr Parma's involvement in it, other than to say that I am not aware of any criminal proceedings being taken against him for money related matters or offences that relate to contraventions of the previous licence conditions at the venue Legs 11.

Conclusion

74. Broad Street is clearly a significant night-time economy hub with a diverse number of venues.
75. The large club style venues and drinking establishments appeared to be the main catalyst for the levels of intoxication and the street behaviour which I witnessed.
76. The two Sexual Entertainment Venues were quiet, unobtrusive (almost indiscernible) in the night-time economy and had no apparent effect on the levels of street intoxication and street behaviour.
77. Paradise City would, if granted a licence, occupy a location in Broad Street that is at the quieter end of the entertainment area. It is opposite a line of business premises on the other side of the road and there is a line of trees between the footpath and the building line on the opposite footway.
78. Whilst there is a building development of high rise apartments being built on the west footway at the junction with Sheepcote Street, Paradise City would be far enough away as to be undetectable at such a distance given the tight conditions on the licence that relate to signage and the facade of the building. I noted that the building referenced is close to both of the other existing Sexual Entertainment Venues and that there is a large venue next to the development that has a very large outside entertainment area.
79. Far more prominent and beside and opposite the residential development are a number of large themed drinking venues and clubs that will be very conspicuous by their bright lights, large customer base, and high noise levels. I have assumed that the advertisement on the hoarding for the apartments *"Discover a vibrant and stylish new home where the city life*

revolves around you" (see Photo no 6) is, in part, a reference to the close proximity of these large night-time entertainment venues and the entire night-time economy of Broad Street.

80. The proposed location of Paradise City is not out of kilter with the rest of the night-time economy in Broad Street and will be far less obvious than the vast majority of venues in the road. Therefore, along with the Standard Conditions in the Birmingham City Sexual Entertainment Venue Policy, and the new additional licence conditions being proposed for a licence, I cannot see grounds where a venue operating under these tight controls will adversely affect any of the licensing objectives or the amenity or character of the locality.
81. The applicant company has taken my advice, and that of its lawyers, as to the future operation of the premises. I believe its proposals to be comprehensive and well-considered. From my own visits to the premises and meetings with Mr Brown I do not doubt his ability to run his premises in a compliant manner.
82. The expressed concern regarding the involvement of Mr Parma is, in my view, dealt with by the raft of conditions which not only exclude him from management of the premises but provide a new broom whereby all managers working at the venue will be new staff.
83. For all of these reasons, I am able to advise that I consider that the licence may be granted in this case.

The contents of this report are true to the best of my knowledge and belief

Signed:

Date: 20th March 2019

AB Conformitas Ltd

**ENVIRONMENTAL AUDIT ON THE MATTER OF AN APPLICATION BY PARMA (MIDLANDS) LIMITED
FOR A SEXUAL ENTERTAINMENT VENUE LICENCE IN RESPECT OF PREMISES AT 193-194 BROAD
STREET BIRMINGHAM.**

(Appendix)

March 2019
A Bamber

Appendix: Statement of A Bamber

Environmental Audit

Pre-reading

1. Prior to arriving in Birmingham I reviewed the internet to evaluate the area of the City that Broad Street occupied and to get some idea of the type of night-time economy that was available. I noted that the City has a Purple Flag Accreditation and the Portman Group highlight the initiatives in Broad Street in a case study.

"The 1990s saw an explosion in the number of nightclubs, pubs and bars in city and town centres across the UK. In Birmingham, the focus of this investment and expansion was Broad Street, which was transformed into a dynamic conference, entertainment and nightlife quarter, centered on the International Convention Centre, which opened in 1991. This rapid growth was a welcome boost for the local economy, but it also brought challenges. Large numbers of young people were attracted to the vibrant nightlife from all over the city and beyond, and driving up standards in licensed premises and managing large numbers of people in public spaces after closing time, became a priority."

2. The 'Visit Birmingham' website has no mention of the Broad Street area and the night-time economy.
3. The 'Brindley Place' website, although adjacent to the Broad Street area, makes no reference to the night-time economy in Broad Street.
4. The University student population has a number of websites that highlight the night life available to students. The comments all revolve around bars and clubs, music and drinking. There was no mention of Sexual Entertainment Venues or casinos.

"The nightlife! All the clubs and bars are in one place (Broad Street) and they are both cheap and so much fun. I can't remember the last time I went out and didn't have a good time!"

5. There is a large selection of individual venues within Broad Street all advertising the night-time economy and their location within it. The website 'Design My Night Out' advertises Broad Street as *"Known as one of the busiest weekend party streets in Britain, Broad Street tends to stay lively until the early hours of the morning. With many bars open until 6 AM, it feels like the party never*

ends here! Brimming with students, stag/hen parties, drinks deals and more, it's a great place to let your hair down after a long week and make the most of the freedom of your weekend. Check out what Birmingham's Broad Street bars have to offer Birmingham's party animals."

6. Having reviewed the various websites and a map of the area I decided that my assessment was best confined to the length of Broad Street from the Five Ways roundabout down to where Broad Street runs alongside the International Convention Centre. I also incorporated Brindley Place into the assessment due to the close proximity of the area in relation to Broad Street. The Brindley Place area included Water's Edge, Central Square, and Oozells Square.
7. I was also conscious that my visit was in February, a cold and not traditionally busy month for the night-time economy.

Audit

8. Broad Street itself runs approximately north to south with the Five-Ways junction at the south end of the area that I identified as the main night-time economy hub along to where Broad Street runs alongside the Symphony Hall.
9. Brindley Place sits west of Broad Street at the north end by the canal and has a number of roads and streets that access and egress from Broad Street.
10. I commenced my walkabout at 7.30pm from the Five-Ways walking north towards the Symphony Hall. I noticed that the vast majority of the entertainment venues were all on the east footway of Broad Street running the entire length, apart from a vacant lot and a couple of shops, all the way to the Symphony Hall.
11. On the west footway from Five-Ways down to Sheepcote Street the buildings, in the main, are set well back from the footway by some significant distance and they all appeared to be business premises. There is also a line of mature trees that stand between the footway and the businesses on the west side. In the summer the foliage will obscure the view across the road. The venue for the proposed Paradise City is on the east footway directly opposite the business buildings and the line of trees.
12. At the point that the buildings on the west of Broad Street become adjacent to the footway, is at the point that the business premises meet a large entertainment venue called Zara's. This venue (Zara's) was quite extensive, it was branded like a night club with a very substantial

covered outside entertainment area with tables, chairs, heaters, and television screens. Further research revealed that the venue had been closed down by the Licensing Authority.

13. From Zara's, at the junction of Broad Street and Sheepcote Street, the buildings then run along the pavement to the far north end of Broad Street.
14. At this point there is a new high rise housing development under construction, effectively in the middle of Broad Street and the night-economy. The hoarding displayed signage that seemed to embrace the local environment and the night-time economy as a plus for living in the complex.
15. The night-time economy contained fast food outlets, a street vendor, restaurants, public houses, large themed drinking venues, night clubs, two existing Sexual Entertainment Venues, and a Casino. The area was also well served with a significant range of hotels where large groups of young people were staying as part of a night out.
16. During my initial walk I counted about 26 significant outlets on the east footway along the length of Broad Street and 4 on the west footway from the Symphony Hall up to Sheepcote Street. I did not include the hotels as part of the count.
17. At 7.30pm Broad Street was quite a busy thoroughfare and the road traffic was moderate. The venues were well lit with large, colourful and bright signage. Pedestrian flow was reasonably busy and predominately on the east footway outside the bars, restaurants, and clubs. The pavement had a significant number of 'A' boards outside the venues advertising 2:1 and discounted drinks to entice customers into the venues. All of the venues appeared to have SIA accredited door supervisors and a number were attempting to tempt customers into their venues.
18. There were a number of large themed venues that had open frontages, about 5-6 meters deep running the entire length of the frontage. They had low walling to separate them from the footway. These appeared to be smoking areas for customers. These areas also had amplified music that could be heard quite some distance from the venue and the sound wave could be felt as I walked past each of the areas.
19. Almost the entire length of Broad Street I encountered groups of young men and a few groups of women that were displaying signs of significant intoxication.

20. From Broad Street I walked into Brindley Square along Waters Edge and into Central Square, and Oozells Square. The area called Waters Edge was situated alongside the canal and appears to be a concentrated area of restaurants and bars. The bars were well known chains as were the restaurants. The area seemed popular with couples and small groups of young people. The area was well lit, clean, and the security staff outside the venues were attentive and friendly. There was music emanating from the bars in the immediate area but it was not loud or obtrusive. Whilst standing in the area where the bridge crosses the canal the noise from the bars was audible, however, the sound of music coming from a venue in Broad Street beside the canal was the most obvious environmental impact as I stood watching and listening.
21. From Waterside I walked into Central Square and from there into Oozells Square. In Central Square there was one quite large bar/restaurant with people sitting outside under heaters drinking and eating. I could clearly hear the amplified music from the other side of the Central Square but it was not as pronounced as the venues in Broad Street or the venue close to the canal opposite Watergate. From Central Square I walked through Oozells Square which was completely quiet with people going to and from the restaurants.
22. After a meal I returned to Broad Street at about 9.30pm and I was struck by the significant increase in the road traffic and the pedestrian flow.
23. As with earlier, the main flow of people tended to be on the east side of the road along and outside the entertainment venues. There were large numbers of people that were clearly intoxicated and queues were forming outside the themed venues (clubs and large bars). The numbers of door security appeared to have increased and surprisingly I saw that the hotels had closed their entrances and door security personnel managed the flow of customers in and out of the hotels.
24. The music levels seemed to have increased, especially in the open areas at the front of the large themed venues, and could be heard some distance from some clubs and bars. These open areas had also started to fill with people who were very loud and intoxicated.
25. As I walked along Broad Street the footway outside the large venues was increasingly difficult to pass because of the volume of pedestrians, queues outside the venues, A boards, and people standing on the footway talking to people in the large open fronted areas of various premises.
26. At the junction with Watergate positioned on the road bridge above the canal were 3 ambulances. As I stood and watched it was clear that the deployment was part of the night-

time economy and was for people who may suffer the effects of alcohol or injuries incurred while out in the area. Throughout the night one ambulance remained as if a static fixture and the bridge area became a focal point for the ambulance service and police officers, and their vehicles.

27. I also noted a visible increase in the number of police officers in high visibility uniforms. Their deployment was along Broad Street, not in Brindley Place, with slightly more officers at both ends of the road. There were also a number of Westside street wardens out on patrol.
28. I continued to walk around Broad Street and Brindley Place until about 2.30am.
29. After about 11pm the traffic levels increased significantly and for the next few hours the traffic filled the entire length of Broad Street, often at a standstill. A large number of vehicles had their windows down and very loud music emanated from the cars and the volumes of music coming from vehicles and bars was quite considerable.
30. The pedestrian flow along Broad Street also increased after 11pm and again it was predominantly on the east footway outside the clubs and bars. I noticed that large numbers of people were coming out of a number of hotels along the street and that the flow of people from the hotels was being managed by door security staff. Many were exhibiting the effects of alcohol and joining the queues outside the clubs and late bars. The size of the queues outside the venues was also increasing.
31. There was a reasonable amount of pedestrian flow on the west footway from the night club on the north side of the canal bridge to an area close to Sheepcote Street. Further south from Sheepcote Street towards the Five-Ways junction the footpath opposite the old Legs 11 and other late night venues was virtually free of pedestrians. The pedestrian traffic was almost exclusively on the east footway outside the clubs and bars.
32. Policing numbers appeared to increase and there were more police vehicles at both ends of Broad Street. The focal point for all of the blue light services seemed to be on the canal bridge.
33. Adjacent to the canal bridge on the north side was a cab rank that was being effectively marshalled by two street marshals that were dressed in high visibility jackets.
34. Brindley Place remained a busy but a relatively quiet enclave. When the restaurants closed for the evening the bars continued until late. There was no queuing, loud or intoxicated behaviour

from customers outside the venues, and the music, whilst audible outside the premises was not too loud or obtrusive. While standing in Brindley Place I could still hear the loud music being generated by the venues in Broad Street that were close to the canal bridge.

35. I had started the evening photographing the street scene as it developed, making a record of the volumes of people, queues, pavement congestion, and traffic. However, after midnight I stopped photographing due the number of challenges I started to receive from intoxicated individuals and groups in and around the venues. I attach copies of some of the photographs that I took.
36. When I stopped walking along and around Broad Street and returned to my hotel the road was still full of traffic from end to end. It was slow moving, and the occupants of the vehicles were still playing exceptionally loud music.
37. The restaurants had closed although there was a street vendor selling fast food. A few smaller bars had closed but the large venues remained open with loud music and queues of intoxicated people waiting to gain entry was the defining image.
38. The street scene remained constant. High levels of pedestrian flow on the east footway with considerably more people on the pavements between Sheepcote Street and the canal bridge in the north. People were displaying levels of intoxication, some were particularly drunk and were being assisted. The queues outside some venues had grown larger and spilled across the footway. People exhibiting levels of intoxication were being admitted into clubs.
39. The pavements along Broad Street had a significant amount of detritus. High concentrations of cigarette butts could be seen outside venues as well as food wrappings and discarded partially eaten food, bottles and cans of drink. It is pleasant to report that my morning walk at 10 am highlighted the effectiveness of the public realm waste management teams. The road and pavements were exceptionally clean and free of any detritus.

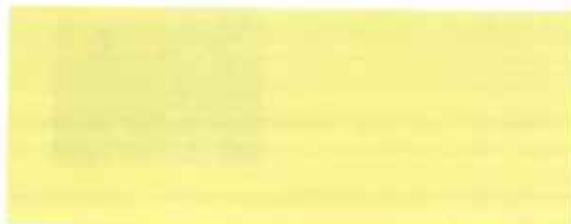
Audit conclusions

40. At the end of my evening I was able to reach some very clear conclusions.
41. The first, which will be well known to anyone involved in licensing and/or management of the night time economy in Birmingham, is that Broad Street is an extremely vibrant night time

entertainment area, with a high proportion of drink-led venues, and all the challenges that brings.

42. The second is that, even within Broad Street, there is a small group of venues that had a completely different environmental footprint to the small bars, large themed drinking venues and the clubs that seemed to dominate the road. These venues were quiet, unobtrusive, with no queuing, no large 'A' boards and no associated bad behaviour. This group of venues comprised restaurants, the Casino near to Bishopsgate Street, and the two Sexual Entertainment Venues that were effectively at either end of the road. One of these, 'Cyclone', is within a few metres of the proposed site of Paradise City.
43. The third is that Brindley Place, albeit part of the night-time economy, with its restaurants and bars, is a far less "charged" environment than the adjacent Broad Street.
44. On returning to my hotel and being vetted into the lobby I spoke with the security team that were managing the door to get an understanding of the unusual security procedures being employed by hotels along Broad Street. The consensus was that the security was in place because of the drunkenness and disorder associated with the high levels of alcohol consumption in Broad Street, and how it spilled over from the street into the foyers of the hotels. It was commented that the street consistently remained this busy and noisy until about 4am in the morning when the night clubs began to close. Mid-week was busy with the student population and January and February were relatively quiet months with the summer bringing an increase in the volumes of people and street disorder.

Signed.



19th March 2019



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SECTION A:

WITNESS STATEMENTS:

NUMBER	NAME
i.	Gary Brown
ii.	Daniel Parma
iii.	Ruxandra Niculescu
iv.	Zviad Tsiklauri

IN THE MATTER OF AN APPLICATION BY PARMA (MIDLANDS) LIMITED FOR A SEXUAL
ENTERTAINMENT VENUE LICENCE IN RESPECT OF PREMISES AT 193-194 BROAD STREET
BIRMINGHAM

STATEMENT OF GARY BROWN

I Gary Brown of [REDACTED] will state as follows

1. I am a Director and majority shareholder of the Applicant Company, Parma (Midlands) Limited.
2. I make this statement in support of the application submitted for a sexual entertainment venue (SEV) licence for the premises to be known as Paradise City at 193-194 Broad Street. The SEV application was submitted with a bundle of supporting documents required and extra documents intending to assist the committee with consideration of the application. I will refer to many of those in this statement.
3. I am the proposed Designated Premises Supervisor.
4. The building which will house Paradise City was previously used as a Gentlemen's Club known as Legs 11. There was a second venue known as Legs 11 on Ladywell Walk China Town and I was employed as a resident DJ there.
5. I did not work at the Broad Street venue. I was not involved in the management of either Legs 11 venue or have any involvement with the companies who ran the businesses other than as an employee.
6. This statement is intended to set out more detail as to the background to the applications, my own involvement and the manner in which I would intend to run the premises going forward.

Parma (Midlands) Limited

7. The applications are made in the names of Parma (Midlands) Limited. I have been involved in the applications from the beginning and have been instrumental in their preparation. It was always intended that I was to be the manager of the venue.
8. I am a Director of the applicant Company with a 51% shareholding. The remaining shares are held by Daniel (Danny) Parma. The reason for that is that Danny is to be a sleeping partner in the operation. He will play no part in day to day management. I will be solely and ultimately responsible for the management of the premises including, of course, compliance with the law and licence conditions under both the SEV and premises licence

9. Danny will be a director of the applicant company. There has never been any attempt to hide Danny's involvement in the company. The name of the company incorporates his surname and the application was submitted with Companies House documentation showing his involvement. Prior to the applications being submitted our solicitors advised the Police of the proposed application and invited them to discuss these. The e-mail inviting the Police referred to Danny. The invitation to discuss the applications was declined by the Police.

My history

10. I was born in [REDACTED] 75 and am currently 43 years of age.
11. I have never been convicted of a criminal offence in the UK or elsewhere. At Tab 5.1 there is a DBS check confirming that there is no record of convictions, cautions, reprimands or warnings.
12. At Tab 5.2 is a copy of my Personal Licence under the Licensing Act and at Tab 5 is also my BIIAB Award for Personal Licence Holders.
13. I respectfully refer the Committee to my CV, which is at Tab 4.1.
14. It will be seen that I currently work as a Valuations Manager at Connells. This is a position I have held since March 2014. On the grant of a licence I will be devoting my full time to this business and it is my intention to resign my role at Connells.
15. I held a similar position to my role at Connells at Your Move from April 2013-March 2014. Prior to Your Move I had worked at Dixons Countrywide as an Appraisal Manager from April 2011.
16. I worked for PC World from 2008-2011 in a sales coaching / training role, and prior to that as a functions and conference manager for 2 years in Norwich. This venue had a large ten pin bowling centre, bars and pool halls etc. It was a family venue where there would be young children. I had to ensure that the children were kept away from the bars.
17. In 1996 I managed a small night club in Great Yarmouth and was the alcohol licence holder for the venue. My duties were wide ranging including cashing up, epos systems, staff training and management and also overseeing door supervisors and admissions policy.
18. Alongside my career in retail and estate agency, from 1994 to 2017 I worked all over the UK and Europe with various companies as a nightclub DJ. This included Luminar Leisure (now Deltic) who were the leading nightclub operators in the country.
19. This has led to me learning many skills including being alert and aware of staff activities and public safety in environments where alcohol is served. It is this capacity that I worked at Legs 11 at the China Town Premises. I worked there from 2013 to November 2017 when it closed.
20. Whilst I was there I developed a good relationship with the staff, including the DPS. This was originally Mr Michael McLean and then Ruxandra Niculescu who is intended to be part of the management team at Paradise City. Although I was the DJ I would point out to the DPS, doorstaff and management any problems I saw. This could be with staff, customers or

dancers, for example someone who had drunk to excess or dancers who were not complying with the Club Rules

21. I believe that I have the maturity, skills and experience to manage and run Paradise City. I have personally been responsible for much of the preparation work for the application and, as I say, I will be the head of the management team going forward.
22. I intend to continue to develop my professional skills. I will therefore attend and pass the BII course for Designated Premises Supervisors. Although it is a voluntary accreditation, I believe that further learning is always helpful. I will continue to look for opportunities to continue my professional development in this role.
23. I am aware of concern regarding the involvement of Danny Parma at Paradise City. I have described him as a sleeping partner. He will not be involved in the day to day management of the premises. In order to make this explicit and binding, a condition is offered to this effect.

Management Team / Staff

24. There is a copy of the proposed management structure for Paradise City at Tab 3.1 of the bundle and CV's of the main persons involved and copy documents at Tabs 4 onwards.
25. I will be the General Manager and as such responsible for day to day operations. I will also be the DPS.
26. I am also intending to undertake the SIA Door Supervisors course. This will mean that both myself and Ruxandra Niculescu have this qualification in addition to the normal door supervisors.
27. Supporting me will be a team including Ruxandra Niculescu (known as Andra). Andra is a personal licence holder (Tab 7.1). She was the DPS at Legs 11 China Town. From my own observation of her, she was a good and effective manager who commanded the respect of her staff. When I was working at Legs 11 China Town I was not aware of any conduct which was illegal or in breach of licence conditions. I have read the decision of the Licensing and Public Protection Committee of 14th July 2017. The allegations of misconduct related to Legs 11 at Broad Street. There was no evidence of misconduct at China Town. This accorded with my experience. From working with her for a period of xxx years, I have full confidence in Andra to be part of my management team.
28. It is intended that Andra will be the duty manager of the premises when I am not there. Further, there will always be a personal licence holder present when the premises are open. The Bar Manager will also hold a personal licence.
29. I make it clear that the previous DPS at Broad Street, Edmund Haxla, will not be employed in the premises or organisation. This is to emphasise that this will be a new broom.

30. In my experience, alcohol-driven crime and disorder is much less of an issue in lap dancing clubs than nightclubs. The main task for door supervisors within licensed premises is ensuring strict adherence to the rules regarding sexual entertainment, particularly the no-touching rule. I understand that this rule was being breached at the Broad Street Legs 11 before it was closed. I can assure the Committee that it will not be breached under my management. Making that assurance involves having strong policies, understood and enforced by everyone working at the premises – management, door security, dancers and other staff – and clearly communicated to customers at all points in the customer journey. Door staff play a key role in the communication and enforcement of the rules. They should be communicating the rule to customers as they enter the club and they should be a clear presence in the area of the booths to ensure that the rules are observed.
31. I have considered the identity of the door team further. I worked with the proposed head doorman Zvaid Tsiklauri before and am confident of his abilities. I considered whether there should be a complete change of doorstaff but I have been impressed by Zvaid who the committee will see now works at Spearmint Rhino, he has clear and valuable experience of supervising such premises.
32. There will also be the introduction of greater CCTV coverage and portable viewing screens allowing the staff to see all CCTV wherever they are in the premises. In addition, CCTV will be retained for 30 days to provide a record of precisely what has occurred in the premises, in case of any inquiry or investigation. We will appoint a bar supervisor and bar staff following the grant of the licence. For the supervisor role, I will be looking for someone with a personal licence and experience of working in and running a busy bar, preferably in a similar environment for 3+ years. I have noted concerns regarding intoxication of customers. If the premises is permitted to open, I will ensure that all bar staff take and pass the BIIAB course in Responsible Alcohol Retailing within 4 weeks of starting work. I am content to offer a condition to that effect.
33. We are not in a position to choose dancers until the licences are granted, but all dancers will be appropriately trained on the conditions and house rules, and there will also be regular refresher training. It is obviously crucial that there is a culture of compliance at the venue. Therefore, if any dancer is found to be breaching the no touching rule, termination of the relationship will follow. I do not believe there is room for any complacency in relation to the enforcement of this rule, and there will be none.
34. Allegations were made against specific dancers on the closure of Legs 11. If the authorities wish I am prepared to consider a condition that those dancers be named and prevented from working at Paradise City.

Opening Hours

35. We had sought 24/7 opening hours as part of this application. We did not expect to open those hours on a normal basis but would wish to be open from 19:00-07:00 each day. We are happy to amend the application accordingly.

Conditions / Policies and procedures

36. With the assistance of Mr Bamber I have reviewed the standard conditions imposed by Birmingham Council and also the policies and procedures used at the two former Legs 11 venues. I have also taken advice from our experienced lawyers.
37. As a result of this exercise, a further set of conditions is now offered, in addition to the Council's standard conditions. The full set of conditions offered is at Tab 2.1.
38. I also produce the documents entitled 'Etiquette & Club Rules (Tab 3.2), and the policies and documents at Tab 3.3 of the bundle. There is also a document at Tab 3.5 which is a risk assessment and shows how we would intend to comply with the conditions.
39. I believe that the problems alleged at Legs 11 Broad Street were not in terms of the procedures, but in terms of the management and enforcement of these. The same policies and procedures were in force at Ladywell Walk under the control of Andra, where there were no issues. Nevertheless, I fully accept that the serious issues at Legs 11 Broad Street mean that greater precautions should be applied to the venue, and therefore I am more than content to offer this series of further conditions, which I can assure the Committee will be strictly applied.
40. I will refer in more depth to the policies below when I look at the various objections.

The Objections raised / responses and proposed conditions

41. With Mr Bamber I have gone through the objections raised in connection with the Licensing and SEV applications.
42. I have set my responses below to those elements I know of. I do not wish to dwell on the past arrangements or allocate blame for the difficulties Legs 11 found itself in. I instead wish to try and demonstrate that going forward the premises will be run in a way which the Council can be comfortable with and which is in accordance with policies and conditions. I also wish to show the steps to ensure that any failings will not recur.
43. Objections to the SEV application have been received from Westside BID, Licensing Enforcement and West Midlands Police. I summarise these objections (briefly) as follows and I will deal with each of these in turn below:
 - (1) Same management structure as previously.
 - (2) Same procedures as previously.
 - (3) Irregularities in financial transactions at Legs 11 Broad Street.

- (4) Unauthorised sale of alcohol and/or service to those who were inebriated or under the influence of prohibited substances.
- (5) Breaches of rules in relation to contact and offering sexual services.
- (6) Locks fitted on the door to booths, including the VIP room.
- (7) The location of the premises, including proximity of cinema, restaurants, religious premises and a new residential block on the opposite side of Broad Street at the junction with Sheepcote Street.

(1) Same management structure as previously

- 44. The premises will be managed by me, assisted by Andra. I am not aware of any criticism of our performance at China Town.
- 45. The previous DPS, Mr Haxla, has no involvement.
- 46. Apart from Zvaizd Tsiklauri the previous door team have no involvement.
- 47. The directors of the former licensee, Thomas Taylor and Sydney Taylor, have no involvement nor do any other Directors of Clear Blue Sky Thinking. Sydney Taylor is deceased.
- 48. Danny Parma, who was involved previously, will have no role in the day to day management of the premises.
- 49. The job of hiring, firing, day to day management and compliance, including compliance with licence conditions, is entirely a matter for me. Danny Parma is a sleeping partner in the business. I would expect him to be involved, for example, in relation to matters such as investment, capital spend and leasehold matters. But he will have nothing whatsoever to do with matters of concern to the licensing authority. He is content to leave all of that to me. To make that both binding and transparent, we are offering a condition requiring that he has no involvement in day to day management matters.
- 50. As I have advised above I have been involved in this matter from very early on, I now have a controlling interest in the business. I have done all the paperwork, written the rules and venue policies and it will be my responsibility to run the business on a day to day basis. This will include staff training and recruitment. Danny Parma fully understands and supports this decision.
- 51. I wish to be absolutely explicit about this. I am a person of good character and reputation. I will not be involved in any venture which permits breaches of the law or licence conditions. These premises will be run in strict compliance with both. For my part, I was the resident DJ at China Town. I did not have any management role in running the premises or the organisation. However, I behaved as a good employee in a licensed premises should, in helping to ensure that the premises ran safely and compliantly. I do not believe that there is any criticism of the day to day management of China Town or my role within it.

(2) Same procedures as previously

52. The venue procedures for Paradise City are necessarily founded on the standard conditions provided by Birmingham City Council.
53. However, we have developed those procedures further on advice from Mr Bamber and our legal team, and following a meeting with the licensing department, in order to respond to the issues at the premises.

(3) Irregularities in financial transactions at Legs 11 Broad Street.

54. It is possible for customers to be charged too much in a lap dancing club. It is also possible for a customer to be charged sums without full appreciation of what they are being charged. From my experience in this field, and also from talking with Mr Bamber, I know that it is also possible for a customer to experience buyer's remorse, and wrongly claim that they were not aware of what they were being charged. It would be wrong of me to comment on what happened at Broad Street. I did not work there and have seen no statements from the customers concerned. I state neutrally that I understand that there have been no prosecutions or, as I understand it, even civil claims, arising from what did occur there.
55. Under my management, there will be no suggestion of overcharging or wrongly charging. Rather, there will be complete transparency.
56. The regime, which will be secured by conditions, will be as follows.
57. First, a clear tariff for performances will be displayed in the dance areas, on tables and at the bar and cash desk.
58. Second, all performances will be paid for before they occur.
59. Third, no credit or debit card payments will be taken by dancers. They may only be taken by staff members who are not therefore the beneficiaries of such payments, to introduce a check and balance into the process.
60. Fourth, no credit or debit card payments may be made in the private dance areas. This effectively means that they must be made at tables (as they would be in a restaurant) or at a cash desk or at the bar.
61. Fifth, all credit or debit card payments for performances exceeding £100 will be made at a designated cash desk, which will be well-lit and monitored by CCTV. All payments must be signed for by the customer.
62. Sixth, credit and debit card payments may only be made to the licensee. This is to avoid any suggestion of processing through another company.
63. Seventh, I understand there is a concern from the licensing department that free alcohol might be dispensed in the VIP room. It will not be. All alcohol must be purchased from the bar.

64. To put some flesh on this, for payments over £100, the client will be taken to the payment point, where there will be a schedule of charges. The client will be asked to produce ID of which copies will be kept. There will be a separate sheet entitled a Transaction Acknowledgment form to be completed, this will need to be signed by the customer showing the amounts. Only then will the customer be asked to use their card, confirm the amount on the screen and enter their PIN number. They would be given the printed receipt. This is all to be carried out in the view of the CCTV cameras which record the customer making the transaction. Staff and dancers are not to be allowed to view the PIN number being entered and the CCTV would not pick this up.
 65. I fully understand the concern in relation to payments. There will be no such concern in relation to the management of Paradise City, should a licence be granted.
- (4) Unauthorised sale of alcohol and/or service to those who were inebriated or under the influence of prohibited substances.*
66. The control of inebriation at the premises is a general management responsibility, which will ultimately be mine.
 67. I intend to support this by a number of means.
 68. First, if I am not at the premises, the premises will be managed by Andra or by another person, who must be a personal licensee. I am willing to offer a condition in that regard.
 69. Second, the name of the duty manager will be displayed at the reception at all times, so that it is clear to any visiting officer who is in charge.
 70. Third, linked to this, there will always be a personal licensee at the premises.
 71. Fourth, the bar supervisor will be a personal licensee.
 72. Fifth, all bar staff will undertake the BII Responsible Alcohol Retailing qualification.
 73. Sixth, I will be taking the BII voluntary accreditation for Designated Premises Supervisors.
 74. Seventh, as stated above, there will be no free alcohol in the premises. All alcohol must be paid for and dispensed from the bar.
 75. So far as drug control is concerned, the premises will be run with a zero tolerance policy on drugs for customers, staff and dancers. Anyone suspected of being under the influence of drugs will not be admitted, or if they are on the premises ejected immediately. Any drugs found will be confiscated and stored in a drugs safe until they can be safely collected by the Police or other suitable authority. Our policies will set out what should be done and relevant staff will be trained accordingly. There will also be random searches of staff and performers, with dismissal in the event of possession of illegal drugs.

(5) Breaches of rules in relation to contact and offering sexual services.

76. In order to ensure greater control of performances, the following additional measures will be employed.
77. First, although there will be fully private booths they will be covered by extensive CCTV which will be able to be monitored by any of the doorstaff, the CCTV supervisor and management. There will be no locks on any rooms with doors. Our previous request to be permitted to lock the VIP room when not in use is not pursued. There will be no lock on this area.
78. Second, there will be a permanent security presence in the area of the booths.
79. Third, door supervisors will carry tablets showing CCTV of the booth areas to provide further monitoring.
80. Fourth, there will be continuous monitoring of the CCTV at the premises including the dance areas. The monitoring position will itself be covered by CCTV to demonstrate continuous monitoring. The person undertaking monitoring will have the facility for radio communication with the door team and management.
81. Fifth, a full record of interventions with dancers and / or customers, together with action taken, will be maintained. The record of interventions shall be counter-signed by the manager or duty manager on a daily basis.
82. Sixth, the management shall undertake daily dip sampling of CCTV to ensure that the no touching rule is observed. A daily record of such dip sampling shall be maintained.
83. Seventh, we will provide an additional monitoring position for CCTV at the reception area, so that any visiting police or licensing officer can instantly view the dance areas at any time, to ensure that all of the rules are being complied with.
84. Eighth, CCTV footage shall be retained for 30 days.
85. Ninth, I intend to offer express conditions that sexual services shall not be offered by performers, and that telephone numbers shall not be given or taken by performers. Any dancer found breaching these conditions will have their contracts terminated. These are obvious rules, but would be expressed for the avoidance of doubt and to ensure absolute clarity on the matter.
86. Tenth, all dancers will receive training and refresher training in the rules, and will have to sign to show that they have received and understand the training and the rules.
87. We have considered the system of fines for the Dancers. I do not believe a £20 fine to a dancer who can make £1000 a night a suitable deterrent. I understand that this view is shared by Andra Niculescu. I believe the way to keep the rules adhered to is through education, training, a change in culture and a disciplinary procedure that will result in the dismissal of the dancer as opposed to a fine. The loss of the job is obviously a far more draconian deterrent.

We are happy also to instigate a system of fines if the Council requires it, but feel that it is more of an adjunct to mark minor transgressions than a deterrent in its own right.

(6) Locks fitted on the door to booths, including the VIP room.

88. As I have stated above, there will be no locks fitted to any doors including the VIP room. We are looking at replacing the current solid doors with ones which have partial glazing (unobscured glass). This would allow easier monitoring of the rooms by staff.

(7) The location of the premises, including proximity of cinema, restaurants, religious premises and a new residential block on the opposite side of Broad Street at the junction with Sheepcote Street.

89. As regards the challenge to the locality these premises have previously been used for many years as a lap dancing club without complaint from any residents or anyone else. There has been no objection from the developers of the residential apartments and those premises would have been granted planning permission at the time when Legs 11 was open. There are also similar venues operating in close proximity which I believe have not received a similar objection when their licences have been renewed.
90. Obviously, the location on Broad Street is very much part of an established night time area. Alcohol-related crime and disorder is not an issue at SEV premises. My experience, coupled with the evidence of Mr Bamber, is that the premises will trade discreetly in their location and without an adverse impact on their environment.
91. In summary, I have, together with our advisers, given thorough consideration to the previous issues. Clearly, many of the previous problems were the result of poor or ineffective management. We have tried to create a staffing structure, develop a set of policies and offer conditions which provide complete assurance that the issues of the past will be eradicated. I am more than happy to discuss any further conditions or policies which may be considered necessary to provide assurance in relation to legality and compliance, since my only intention is to oversee a safe and lawful operation.

External Audits

92. There is a separate report from Mr Bamber. Mr Bamber was recommended to us as an external consultant with a strong expertise in this area. He is a former senior police officer with strong local government and licensing experience. I believe that his involvement in the business going forward is very important to help demonstrate that we are in compliance. He brings the ability for us to have external checks and balances on our systems and recommend changes if necessary. For example, it was he who recommended changes to the CCTV. Mr Bamber and I, together with the legal advisers, have worked closely together to provide the policies and draft conditions which we think are necessary to show that the Club will meet the requirements of the Council and others to ensure that the Club is run properly.

93. I am very happy for Mr Bamber to continue to be employed when the premises open. He is being asked to supervise all licensing matters and to do mystery shopper visits to ensure we are complying. I am prepared to offer a condition that Mr Bamber audits the premises quarterly, and that the audit reports be made available immediately to licensing or the police upon request.

Proposed Conditions

94. Through the course of this statement I have made reference to some of the further conditions we are suggesting. The full list of proposed conditions is at Tab 2.1
95. Birmingham City Council's standard conditions are comprehensive. Nevertheless, I fully recognise that, in the light of the previous history, greater assurance is required, to guarantee that the premises will run according to the law, the licence and the expectations of the authorities.
96. The list of conditions we have attached is intended to provide a very strict set of measures by which we will judge ourselves and expect to be judged. I wish to emphasise that this is a living document. If there are further measures suggested by the authorities or by the Committee itself, we will of course be more than glad to consider them.
97. I am confident that we will run the premises in accordance with the conditions and I would hope and expect that we will quickly allay the concerns of the authorities and the objectors.
98. Clearly, all involved with this venture understand that if there is not complete compliance, the result will be closure of the premises.

The contents of this statement are true to the best of my knowledge and belief.

Signed

Dated

IN THE MATTER OF AN APPLICATION BY PARMA (MIDLANDS) LIMITED FOR A SEXUAL
ENTERTAINMENT VENUE LICENCE

IN RESPECT OF PREMISES AT 193-194 BROAD STREET BIRMINGHAM

STATEMENT OF DANIEL PARMA

I Daniel Parma of [REDACTED] will state as follows

1. I am a Director of the Applicant Company, Parma (Midlands) Limited, and I make this statement in support of the applications submitted for a Sexual Entertainment Venue (SEV) Licence for 193-194 Broad Street.
2. There is produced a bundle of documents to explain and support the application. References to tab numbers are to this bundle.
3. I am the holder of a personal licence under the Licensing Act 2003 granted by Birmingham City Council. I am also the holder of an SIA licence from the Security Industry Authority. (See Tab 6.2.)

My personal history

4. I fully understand that my involvement in this application is one of the main reasons that objections have been made to this application. Therefore, I believe it right to set out my personal history, and my involvement in Legs 11 at both Broad Street and China Town in a full and open way.
5. I was born in Lezhe Albania on [REDACTED] name at birth was Elton Lekstakaj (see birth certificate at Tab 6.1). I have 2 sisters. One of my sisters lives in Albania, the other in Italy.
6. I was at school from ages 4-18 but I have no formal school qualifications. I didn't take any University entrance exams, those were due the year I left the Country.
7. When the troubles began in Kosovo, it was not safe for us as Albanians to remain. I therefore came to this country as a refugee seeking asylum with my mother in 1997 when I was 19. My father, who is disabled, was left behind and he followed in 1999. We came to the country through Italy and were smuggled into Britain in a lorry. I would confirm that I have no criminal offences to my name in either Albania or Kosovo.
8. When I came to England, I tried to learn English. I now understand the language well but sometime struggle to express my answers correctly in replies to questions.

9. I met my wife here when she was over here on a Student Visa and married in November 2005. She was studying engineering at Falmouth. In 2007 her visa expired so she had to return to Albania. She remained there until 2012 when she was granted the right to return on a married Visa.
10. We have 3 sons and a daughter, all of whom were born in the UK and are UK nationals. My eldest son Peter was born in 2006, my daughter Amy was born in September 2007. Following my wife's return to the UK we had a second son Sidney in May 2013 and another Andrew in March 2017. The children all attend local schools.
11. We own the house where we live having bought it in 2013/2014. It is a 3 bedroom terraced house.
12. I have only been back to Albania 3 or 4 times since I left including one trip in 2010 to see my wife and children who were then living there. The only relatives I have in Albania are one of my sisters and her 3 children.
13. On 7th January 2005 I obtained a Certificate of Naturalisation and became a British Citizen. This was founded upon a grant of indefinite leave to remain in the UK I obtained a British Passport which was issued on 11th January 2005.
14. On 21st February 2005 I changed my name by Statutory Declaration from Elton Lekstaka to Daniel Parma. I wanted to make the UK my home and I was finding that people were having difficulty spelling my names. I applied for, and was issued, a new British passport in the name of Daniel Parma. This was issued on 28 February 2005. I have not tried to hide this change of name: I have always been completely open about it.
15. In 2015 I submitted my passport for renewal. This application has been under consideration by the Home Office since that time. The reason is that when I came to this country as a 19 year old refugee, I was advised to identify myself as Kosovan. It is being said that I ought to have stated that I was originally Albanian.
16. At this time a problem seems to have arisen and this is being handled by lawyers I have instructed in London. My grant of indefinite leave to remain was founded upon a claimed identity as a Kosovan (hence "Serbian") refugee. At the time I came to the country I was only 19, was travelling as a refugee and was told that if I applied as a Serbian refugee the process would be easier. I was young and scared and followed the guidance of those who were advising me. I fully accept that the identity I claimed at that time was not "genuine", as I am in fact Albanian. My lawyers tell me that the Home Office are continuing to consider my passport renewal application.
17. I have involved my MP Jess Philips Labour MP for Yardley in this and I have a letter from her saying that the case remains under investigation and there is no timescale for completion. According to my lawyers in the unlikely event that the Home Office seek to refuse the passport application and decide to revoke both my citizenship and my earlier Indefinite leave to remain, they would vigorously resist that based upon my family life here in the UK. I am in

any case advised that there is no action against me, I remain a British citizen and am entitled to work and establish a business here.

18. In order to be fully open regarding my history, it is right to disclose that I do have one criminal offence to my name, in 2010. At the time I was working in a club and came across what appeared to be a mobile phone. I put it in my pocket and then forgot to hand it in at the end of my shift. Later than night, I was stopped by the police on a random check, and they identified the item (some time later) as a small taser, this was a completely surprise to me, not least because I had no idea that you could disguise a weapon in this way. It is not something I would ever want to have on me. However, because I had it in my possession (which I did not deny) I was charged and convicted of possession of an offensive weapon.
19. I have no other criminal history, either in the UK or elsewhere.
20. I obtained my Personal Licence in 2014. In order to obtain my Personal Licence and regain my SIA Licence in 2012, I disclosed the offence at para 18. It did not prevent my obtaining either licence. Both licenses are enclosed at Tab 6.2.
21. I also produce a recent DBS check at Tab 6.3, which can be seen to be in my current and former names. As can be seen, there are no other matters listed.
22. I have never been arrested or charged with any offences arising out of the closure of Legs 11. There have also been no civil or other enforcement proceedings brought as far as I am aware arising out of the closure against myself or anyone else involved. I have co-operated fully with the Police and others in their investigations when required to do so.
23. I instructed solicitors in London to deal with the investigation against me. In February 2018 I was advised by my solicitors that the Police and HMRC were not proceeding and that all the paperwork they had removed from the premises was being returned to me.
24. I appreciate that other allegations have been made against me in the past that I am involved in organised criminal gangs in Eastern Europe. This is unfounded. I can confirm that I am a law-abiding individual without connections or involvement with organised crime. I have seen no evidence whatsoever to the contrary.

My work history

25. I have had a variety of jobs since being allowed to work within the UK. From 2000-2005 I worked as a forklift truck driver for Fed-Ex in Birmingham. I worked in their warehouse loading and unloading
26. In 2005/2006 I moved and worked as a groundsman / greenkeeper at a golf course near Birmingham Airport.
27. In 2006 I began working as a doorman / security guard and took my qualifications to become SIA registered. I worked for a company known as PRP based in Wolverhampton. I was,

amongst other roles, doorman for Iceland and for Global Company. I worked at various clubs in the Birmingham / Wolverhampton area.

28. I continued to work as a doorman until 2010 when my conviction meant that I lost my SIA certification and I was unable to work. I found work -time in a chip shop.
29. In 2012 after I regained my SIA badge I began working as door staff again in Birmingham. Around this time I first met Sydney Taylor who was a Director of Clear Blue Sky Thinking Ltd. They were the licence holders for Legs 11. I saw him often in town but I remember meeting him at Milanos, a restaurant in China Town which was owned by the Taylor family.

My involvement in Legs 11 premises

30. Sydney Taylor later told me that Legs 11 Broad Street was not making any money, indeed they were losing money. He said that he wanted to spend more time abroad and that he had family problems, he was married to a Brazilian lady and had a son in Brazil. After a while he suggested that we work together and that I take over the running of the club for a period. The period was for 6 years. There was a large amount of rent to pay on the premises and I agreed to be a guarantor on the Broad Street premises.
31. I was the effective owner of the Club, but the day to day running of the club when I took over was by Michael MacLean the DPS. This remained the case until Mr MacLean left in August 2016. Sydney Taylor had very little to do with the business on a day to day basis. I based myself mainly at the China Town premises and would attend the Clubs 4-5 days a week.
32. When I went to the Clubs I would do very little other than chat to the staff and sit at the bar or in the office. Mr MacLean ran the premises and was responsible for hiring and removing staff and complying with the conditions. I had confidence in him.
33. As the Committee knows, at the time of the closures of Legs 11 I was a Director of 2 companies, Dansid Limited and Take it Back Limited. They were the companies through whom all the payments for China Town and Broad Street Legs 11 were made. This included the card payments. I had an accountant who prepared all the necessary returns.
34. I believe that all payments made through Legs 11 were properly accounted for and tax returns and company returns made for both companies. Although HMRC took all the records following the closure there has been no further investigation into those companies and all records have been returned.
35. Approximately 2-3 years before the premises were closed we had an inspection by HMRC. They were happy as to the accounting / VAT generally, but at the time myself and 3 other members of staff were being paid as self-employed. HMRC told us that this was wrong and I took steps to change this immediately, we were all changed to employed status.
36. My accountant has prepared all my tax returns and I have paid all my tax and NI payments.

37. I fully accept that I was involved in the Legs 11 businesses. I was led to believe by Sydney Taylor Junior (the 100% shareholder of Clear Blue Sky Thinking Ltd) that there was no problem with this. Mr Taylor handled all the SEV licence applications and renewals and I was unaware that I should have been referred to on these. I believe that Mr Taylor did not tell his advisers about my involvement. The Police were aware that I was involved in the business and I was present on many occasions when they visited the premises.
38. As I have said the premises at Broad Street formerly traded as Legs 11. The Premises were operated as a Sexual Entertainment Venue under a Premises Licence under the Licensing Act and an SEV Licence. Both licences were in the name of Clear Blue Sky Thinking Limited of which I was not a Director or Shareholder. There was another similar venue licensed to Clear Blue Sky Thinking Limited based at Ladywell Walk China Town.
39. The Premises were both subject to enforcement action and Broad St closed in July 2017.
40. The Broad St Premises were, for many years, under the day to day supervision of Mr Michael McLean. During his time at the premises I can say that there were few, if any incidents which caused problems, and I believe the police would agree that he ran the premises well.
41. Mr McLean left in August 2016 and Mr Eddie Haxia was appointed as DPS for Broad Street, and Ruxandra Niculescu DPS for China Town. They were appointed without my agreement by Thomas Taylor, the uncle of Sydney Taylor who was also a Director of the licence holders Clear Blue Sky Thinking Limited. I was told they needed appointing urgently due to the sudden departure of Michael MacLean.
42. The appointment of Eddie Haxia to run Broad Street was a mistake by Thomas Taylor. He did not control and run the premises as tightly as Mr McLean but I was unaware of this for some months. At this time I was suffering from mental health problems and suffered a nervous breakdown. I was obviously not as heavily involved as I used to be. I believe my problems were triggered by a spiked drink but they reached a stage where I was admitted to hospital under the Mental Health Act and stayed there from 14th December 2016 to 13th January 2017.
43. I was only visiting the premises 2-3 times a month after this and although Andra ran the China Town premises very well, there obviously followed a number of problems at Broad Street which ended with the enforcement action being taken.
44. After the enforcement action I did not take any further role in the business. At the time of the enforcement visit to Broad Street I was at the China Town premises. I received a call telling me about the enforcement action and I went immediately to Broad Street.
45. On arrival at Broad Street I found the main door closed and I was allowed entry by the Police when I explained who I was. I was not questioned by the Police but I was asked for the key to the safe. This was in my car and I went with the Police to collect it. I went back to the premises and opened the safe as requested, leaving the key with the Police. The safe only had the cash float in it.

46. I stayed on the site until the Police had finished. I was not questioned nor was I asked to give a statement. My home was raided and bank statements, personal and business papers, mobile phones and tablets were taken. All of these were later returned to me and I have never been charged with any offence following the enforcement action.
47. I was later handed copies of papers closing down the Broad Street premises and this was closed down. I never went back to that site. I went to the China Town premises which continued to run for a period until I resigned on 23 August 2017. After that date I had no further involvement with the business.

Parma (Midlands) Limited

48. The applications for new licences are in the names of Parma (Midlands) Limited. I am one of the two Directors of the Applicant Company, the other is Mr Gary Brown. The company is a private limited company and was incorporated on 23 January 2018. The Company has no trading history as it was formed with the intention solely of being used for the purposes of the applications.
49. Initially I was the sole Director and sole Shareholder of the Applicant. However due to my involvement with the previous venues known as Legs 11 I was advised that I should not be in control of the day to day management of the business, and that I should not be the sole director or the main shareholder. I have complied with that advice. I do not, and never did, intend to be involved in the management of day to day operations at the new venue when it opens. The daily running of the business will be controlled by Gary Brown who will be giving up his current job at Connells.
50. If there is any question that I will be running matters 'behind the scenes', I can assure the Committee that this will not be the case.
51. For the reasons set out above, and following the objections received, I have agreed recently that the Company running the Premises will be owned jointly by myself and the other Director, Gary Brown. Mr Brown now has a controlling shareholding of 51%. The remaining holding of 49% being held by myself. I intend to be 'a sleeping partner'.
52. The costs of making the application and supporting works are being funded by way of a loan from the Company Take It Back Limited. I am advised by my accountant that this is legal and that the loan will appear in the books of Parma (Midlands) Limited as a loan from Take it Back Limited and repayable as such. The loan is not from myself. Gary Brown retains a majority share in the Company.
53. In objections by the Police and others to the applications references are made to their concerns as to my involvement. There are allegations that the company was set up as a smokescreen to hide my interest in some way, and that attempts are being made to mask my involvement. This is not the case. We have always been fully open as to both ownership and

directorship. The Police in their own objections refer to communications from our solicitors referring to myself as instructing them.

54. My solicitors invited the Police to discuss the applications so we could try and answer their concerns before the applications were submitted. This request was declined by the Police.
55. The name of the company alone indicates my involvement. With the SEV application we provided copies of the Companies House documents which clearly show the directors as being myself and Mr Gary Brown. We were not required by the rules to file these documents. The application also clearly refers to my involvement.
56. As I have stated the venue going forward will be run and operated by Mr Brown for the Company with no other companies (other than suppliers) being involved. All payments from card machines etc will be made to Parma (Midlands) Limited.
57. The Committee will know that the licence could not be transferred to another company without an application for transfer and the opportunity for objections by the Police. I and Mr Brown are prepared to offer an additional condition that there should be no change in shareholdings without first giving appropriate notification to the Police.

Conclusion

58. Although I am not taking part in day to day management I can confirm that I have read the statements of Mr Brown, Ms Niculescu and Mr Bamber and have noted the proposals for the management of the premises they set out.
59. I also confirm that I will not be directing, involving myself with or otherwise interfering with the day to day management of the premises.
60. Working with Gary Brown, Mr Bamber and our advisers we have drafted a series of conditions which take into account the objections made. I believe Mr Brown will be able to run the club within these conditions.

STATEMENT OF TRUTH

The contents of this statement are true to the best of my knowledge and belief.

Signed

Dated ✓

IN THE MATTER OF AN APPLICATION BY PARMA (MIDLANDS) LIMITED FOR A SEXUAL
ENTERTAINMENT VENUE LICENCE

IN RESPECT OF PREMISES AT 193-194 BROAD STREET BIRMINGHAM

WITNESS STATEMENT OF RUXANDRA NICULESCU

I, Ruxandra Niculescu, of [REDACTED] will state as follows:

1. I make this statement in support of the applications submitted by Parma (Midlands) Limited for a Sexual Entertainment Venue (SEV) Licence for 193-194 Broad Street. I was born in Romania on 22 December 1984 and have been residing in the United Kingdom since 1 March 2007. I confirm that I have permanent residence of the United Kingdom.
2. I do not have any criminal convictions either here or in Romania.
3. I am the holder of a personal licence under the Licensing Act 2003 granted by Birmingham City Council in 2013 (There is a copy in the bundle of documents with this statement at Tab 7).
4. I am currently employed as a part-time Branch Administrator at Shipways Estate Agents and a part-time mortgage advisor at Mortgage Circle.
5. I completed my CeMAP mortgage advisory course in June 2018 and have commenced a business management course with the University of Bedfordshire due to be completed in three years.
6. I am trained and certified in first aid, health and safety, data protection (GDPR), financial crime, estate agency regulation and fire marshalling. I have also completed a Restaurant Hospitality and Management Diploma (certificates at Tab 7).

History

7. I previously worked at the former Legs 11 premises in China Town Birmingham. I was employed there from June 2013 until 24 August 2017, and was the DPS there from August 2016 to August 2017 when I resigned following a change of management.
8. The Premises were operated as a Sexual Entertainment Venue under a Premises Licence and SEV Licence. There was another similar venue trading as Legs 11 based at Broad Street, these are the premises to which the current application relates.

9. During my employment at Legs 11 China Town my role developed. I was initially the house mum/bar manager and then progressed to a duty manager and then a general manager with my final role being the DPS. I confirm that I have never worked at Legs 11 Broad Street as a member of staff but did attend occasionally at the request of the management to help with paperwork.

My proposed role at the new premises

10. I confirm that I am happy to be involved in the business as duty manager.

Closure of Legs 11 Broad Street

11. I am unaware as to many of the specifics in relation to the enforcement action at Legs 11 Broad Street which led to its closure. I was not based at those premises due to my role as the DPS at Legs 11 China Town. I have however been told of some of the allegations and read about these in the press.
12. The Committee will be aware that the premises at Legs 11 China Town, which were under my control, were not closed down by the Police and were not subjected to a raid in the same manner as Broad Street. Legs 11 China Town was allowed to stay open after the Broad Street premises were closed down.
13. For the sake of completeness, I mention that my own home was searched and my cash savings were removed. I demonstrated that the cash was my own money and accounted for it by reference to my taxation documents. In due course, the police returned the money to me. I have not been asked to make any statement in relation to the allegations regarding Broad Street.

Avoidance of Credit Card Fraud

14. I understand that there are allegations of credit card fraud in respect of transactions which were taken from customers visiting Legs 11 Broad Street.
15. At China Town we had a set procedure for card transactions to ensure that customers were fully and demonstrably aware of what they were being charged. The procedure was rigorously enforced and worked well. It was as follows.
16. The procedures involved the completion of a 'Transaction Acknowledgement Form' which the customer then checked and signed before their card was charged. A copy of this form is at Tab 3.5 ✓ In the bundle of documents. Before the card was charged we would also insist on photo ID being shown to verify the card holder as being the person present. A copy of the ID was retained.
17. Price lists were clearly situated at the bar area.

18. The client would then insert their credit card into the machine and details would be inputted to include the amount of the transaction, date and time. In the normal way the customer would have an opportunity to review this information and then enter their PIN code. By this time the amount would already have been entered on to the form. A receipt would be printed and a copy was given to the customer. The copy receipt we retained together with the copy of the customers ID and the signed transaction form. These documents would then be placed in a folder which I retained for a period of six months. After this period I would store them in a storage box in a secure room. With the new premises documents will be destroyed after six months.
19. These transactions would take place in view of the CCTV cameras, so that any allegation of intoxication could be readily checked. In general, this procedure will be carried into Broad Street, but I understand (and agree) that further controls will apply, in particular that dancers will have no part in the payment process, payments will not be made in the private dance areas, all performances will be paid for in advance, all payments over £100 will only be made at a designated place to introduce even greater formality and CCTV will be retained for longer.
20. It is in the nature of sexual entertainment venues that customers are sometimes embarrassed to admit to themselves or their partners why or how they have run up such costs. In such a case, we might get a query from a bank or card company regarding a payment, following a customer suggestion that they did not authorise the payment or were not sober when they did so. It is extremely important that the venue can show with absolute certainty that the customer knew what they were doing. In the case of China Town, there was never an occasion when a bank refused to honour a transaction, following our proof that the transaction was entered into transparently and voluntarily. However, with the further controls which have been suggested by our advisers, I am still more confident that the only payments taken will have been willingly and knowingly made.

Drugs/intoxication

21. We operated a zero tolerance policy on drugs for employees, dancers and customers. This is a policy which I understand will be the same at the new premises. I could not work in premises that did not adopt this approach.
22. I do not believe that intoxication is a frequent issue in sexual entertainment venues, since on average customers tend to be older than in pubs and clubs and are visiting for the entertainment rather than the alcohol, at least that was the experience in China Town. At Broad Street there will be strong training and venue policies in relation to intoxication, and ultimate responsibility for enforcing these will be for Gary and myself.

VIP Room

23. At both premises there was a Room 11 VIP area. No 'free bar' was operated. However, if customers paid for use of the VIP room a bottle of prosecco or champagne would be included.

24. No free bar will be operated at Broad Street if this licence is granted.

Dancers

25. The welfare and control of the dancers is always one of my main concerns.
26. I understand that there allegations of dancers at Legs 11, dancing too close to the customers. There were no such allegations in respect of China Town. All the dancers were made fully aware of the conditions on the licences as to what they could / could not do and were made to sign a form confirming they had been given a copy of the conditions, were aware of the restrictions and would abide by them.
27. This was rigorously enforced at China Town. I understand that on the appointment of any dancers under the new regime we would adopt a similar policy. The rules will be explained to the dancers with each dancer signing a sheet to confirm their understanding and the penalties if they fail to do comply with such rules. They will be given a copy of the rules as well.
28. My understanding is that allegations have been put forward that customers were being offered sexual intercourse/other services in exchange of money. It certainly had not come to my attention that any dancer was offering such services: at China Town this would have led to the dancer being dismissed immediately.
29. For the avoidance of doubt, I should stress that, as was the case at China Town, every one working at Paradise City will have to provide proof of address and ID, National Insurance number, and if necessary their right to work within the UK. Copies of all such records will be kept on the person's file and regularly checked and updated if necessary.

Mr Gary Brown

30. Mr Brown is well known to me. He was formerly involved at Legs 11 China Town as the resident DJ from 2013 until 2017. I consider him to be a professional individual who seems to understand and know everything necessary in relation to the business.
31. Although only the DJ, Mr Brown was proactive during his role as the resident DJ and would often contact management, doorstaff and bar staff if he spotted any issues or difficulties. He seemed to adopt a responsible attitude to the club patrons, dancers and dancers as a whole.
32. My understanding is that Mr Brown will be primarily responsible for running the business and will be supported by me. I confirm that I am absolutely comfortable working with Mr Brown and consider him to be more than suitable to run the business on a daily basis.

Mr Daniel Parma

33. I understand that allegations have also been made in respect of Mr Daniel Parma being linked to gangs and being involved in the Albanian mafia. I am unaware of any such connections and did not see any evidence of this whilst I was at China Town.
34. I can confirm that at no time did Mr Parma encourage us at China Town to depart from the conditions on the premises or SEV licence or to break the premises rules or do anything else amounting to a breach of the law. I would not have been prepared to do so in any case, but such a situation never arose. It goes without saying that I have exactly the same attitude in relation to Broad Street. I understand that Mr Parma is to have nothing to do with day to day management at the premises. However, if I was encouraged to behave unlawfully by any person, I would immediately report this to the authorities. I am a law-abiding citizen and under no circumstances would I permit this to be compromised.

Rules, Systems and Implementation

35. At China Town systems were introduced and an etiquette rule book was presented to each of the dancers. I had prepared bullet points of things to prompt me when training the dancers. We implemented the form, at Legs 11 China Town, in relation to the dancers and the issue of dancing too close. These rules have helped to inform the set of venue rules and policies in Tab 3 of the bundle.
36. We fully enforced the rules at China Town and ran a friendly, lawful sexual entertainment venue. The policies and conditions offered in this case go still further. I have no doubt at all that we will run Broad Street in a similarly lawful way.
37. Training for all staff members and dancers is key. I ran regular training sessions at China Town. I constructed a training questionnaire for all members of staff to complete which is at Tab xxx.3.6. At Broad Street, we will ensure that a similar regime is followed.
38. In conclusion, we ran China Town in compliance with the law and the licences over many years. I am fully confident that we will run Broad Street compliantly too, particularly with more specific conditions, and with the external audit function in place.

Statement of Truth

I confirm that the facts set out in this witness statement are true.

Signed: -

Dated:

Document at

IN THE MATTER OF AN APPLICATION FOR A SEXUAL ENTERTAINMENT VENUE LICENCE AND FOR A
PREMISES LICENCE UNDER THE LICENSING ACT 2003

IN RESPECT OF PREMISES AT 193-194 BROAD STREET BIRMINGHAM

PARMA (MIDLANDS) LIMITED

Applicant

STATEMENT OF ZVIAD TSIKLAURI

I Zviad Tsiklauri of [REDACTED] will state as follows:

1. I am the proposed Door Supervisor of the new venue Paradise City at Broad Street Birmingham and currently hold the position of Senior Door Supervisor at Spearmint Rhino Gentleman's Club in Leicester.
2. The facts and matters set out in this statement are within my own knowledge unless otherwise stated, and I believe them to be true. Where I refer to information supplied by others, the source of the information is identified; facts and matters derived from other sources are true to the best of my knowledge and belief.
3. I was born in Georgia on [REDACTED] and have been residing in the UK since February 2005. I confirm that I have permanent residence of the United Kingdom.
4. I am the Senior Door Supervisor at Spearmint Rhino Gentleman's Club in Leicester. I have held this position since August 2017. In this role I manage crowd control at the venue and coordinate the other door staff. In my supervisory role it is very important that I understand the venue's rules and carry them out. I have held senior supervisory roles since 2011.
5. I will be the Senior Door Supervisor of the Applicant Company, Parma (Midlands) Limited, and I make this statement in support of the applications submitted under the Licensing Act 2003 for a Premises Licence for the Premises at 193-194 Broad Street, and a Sexual Entertainment Venue (SEV) Licence for the same premises.

6. The premises concerned formerly traded as Legs 11. This was a Sexual Entertainment Venue under a premises and SEV License. I was employed as the Senior Door Supervisor at the Broad Street venue from February 2014 to May 2017 when I moved to the Ladywell Walk premises and stayed there until August 2017.

History

7. Prior to employment at Legs 11 I was Head Door Supervisor at Shaftsbury Casino in West Bromwich from July 2011 to January 2014 which involved close observation of all areas of the venue, identifying clients intoxicated by drink or drugs, checking the identification of clients, crowd control inside and outside the premises, and enforcing the regulations of the venue. This required me to be familiar with and understand the policies and procedures for the business, comply with them and carry them out. I left here for the job offer at Legs 11.
8. I have worked in the role of Head Door Supervisor at several other SEVs and nightclubs including Amara VIP in Leamington Spa from December 2009. These roles required understanding of the regulatory policies and procedures of the different business and make sure the staff under my responsibility could apply these policies as well.
9. I have completed an SIA Door Supervisors training course, a Close Protection Course, hold a Georgian Law Degree and am multi lingual in English, Georgian and Russian so can communicate well with all clients, staff and my employers.
10. I have competed for both England and Georgia in Judo and held the Commonwealth Heavyweight Champion title, competing for England in 2012.

Legs 11 Head Door Supervisor Role

11. As Senior Door Supervisor at Legs 11 I was responsible for the team of 3 door supervisors, for their briefings and discipline and to keep constant radio contact with them.
12. My responsibilities also included observing areas of the venue and protecting the security of the dancers and clients. It was my job to provide crowd control to the stage area and outside the club where necessary. There was rarely any need to take action in these areas and CCTV coverage was better than in any other SEVs I have worked in before or since. I typically worked every night.
13. Whilst I was working at Legs 11 Broad Street there was very little trouble at the venue. In my experience as a Door Supervisor this is indicative of SEVs compared to nightclubs and other

night time businesses. In a typical month there was never any fighting or violence and inside the club there was rarely any trouble, only minor incidents with complaints about the girls not giving enough dance time. In my experience this is very common in all SEVs. The protocol for this was for the manager to review the dance on CCTV. This was very easy in Legs 11 since the CCTV footage was so thorough and always covered the dances, payment and signing the agreements.

14. For the majority of time I was employed at Legs 11 Michael McLean was the DPS and he ran a very organised business. He was always prepared to turn people away at the door if they appeared underage or drunk or liable to cause disruption. I think the police would agree that there was very little trouble whilst Michael McLean was the DPS.
15. The policies for entry at Legs 11 were that if clients looked young we would check their ID to make sure they were over age. We adopted a Challenge 25 policy. A smart dress code was enforced. Entry cost £10 and sometimes there were vouchers for entry produced.
16. The door staff told all clients the rules as they entered. Every entrant was told they must not touch the dancers and must be respectful of them at all times. These rules were followed and clients were ejected if there was any breaches. If a client appeared drunk or under the influence of drugs they were not allowed entry and the door staff were vigilant to this. The same procedure operated to groups of clients including stag parties. Spearmint Rhino operates an over 18s policy.
17. There was a zero tolerance drugs policy at both Broad Street and China Town Legs 11 clubs. Any clients suspected of taking drugs were immediately ejected. This is the same at other SEVs I have worked at including Spearmint Rhino currently. Where drugs were found these would be confiscated and disposed of safely or handed to the Police.
18. Whilst I was at Legs 11 Broad St and Ladywell Walk it was not tolerated for men to touch the dancers. If this was spotted on CCTV or otherwise this would be immediately referred to the manager. Clients were given one warning before being ejected from the club. This procedure always occurred to my knowledge.
19. There was no rivalry between staff or clients of Cyclone, the neighbouring SEV on Broad Street and to my knowledge we never received any noise complaints either. There were certainly never any queues caused by clients to Legs 11 even when groups arrived. "Pit Stop" a late night street takeaway venue adjacent to the Legs 11 venue regularly caused queues of people encroaching onto the street area in front of Legs 11 and if there was any trouble outside the

venue it was from their customers. I suspect this is still the case now that Legs 11 is not operating.

20. The door staff at Legs 11 were regulars and a good team who knew each other and the regular clients and the procedures for the club very well.
21. I left Broad Street Legs 11 in May 2017 to go to China Town Legs 11 where Ruxandra Nicolescu was the DPS. She ran a smooth business and always had everything in order. She was definitely on top of her game. There was never any problems with violence or crime at China Town either. Gary Brown was working at China Town as the DJ when I moved there and I look forwards to working with him again. He is very knowledgeable of the policies, procedures and regulations of SEVs and I am confident he will run a very compliant venue.
22. Mr Osman took over as senior door supervisor at Broad Street and had been in my door staff team before I left so was very familiar with the operations.
23. For most of my time at the venue Michael MacLean was the DPS but he left and was replaced by Eddie Haxia. It was during Eddie Haxia's time as DPS the premises was subject to enforcement action and closed.
24. I was not working at Broad Street Legs 11 at the time of the raid, having already moved to China Town but I was most shocked to hear about the enforcement action. The accusations are hard to imagine based on my time working there.

I believe the facts in this statement are true.

Signed

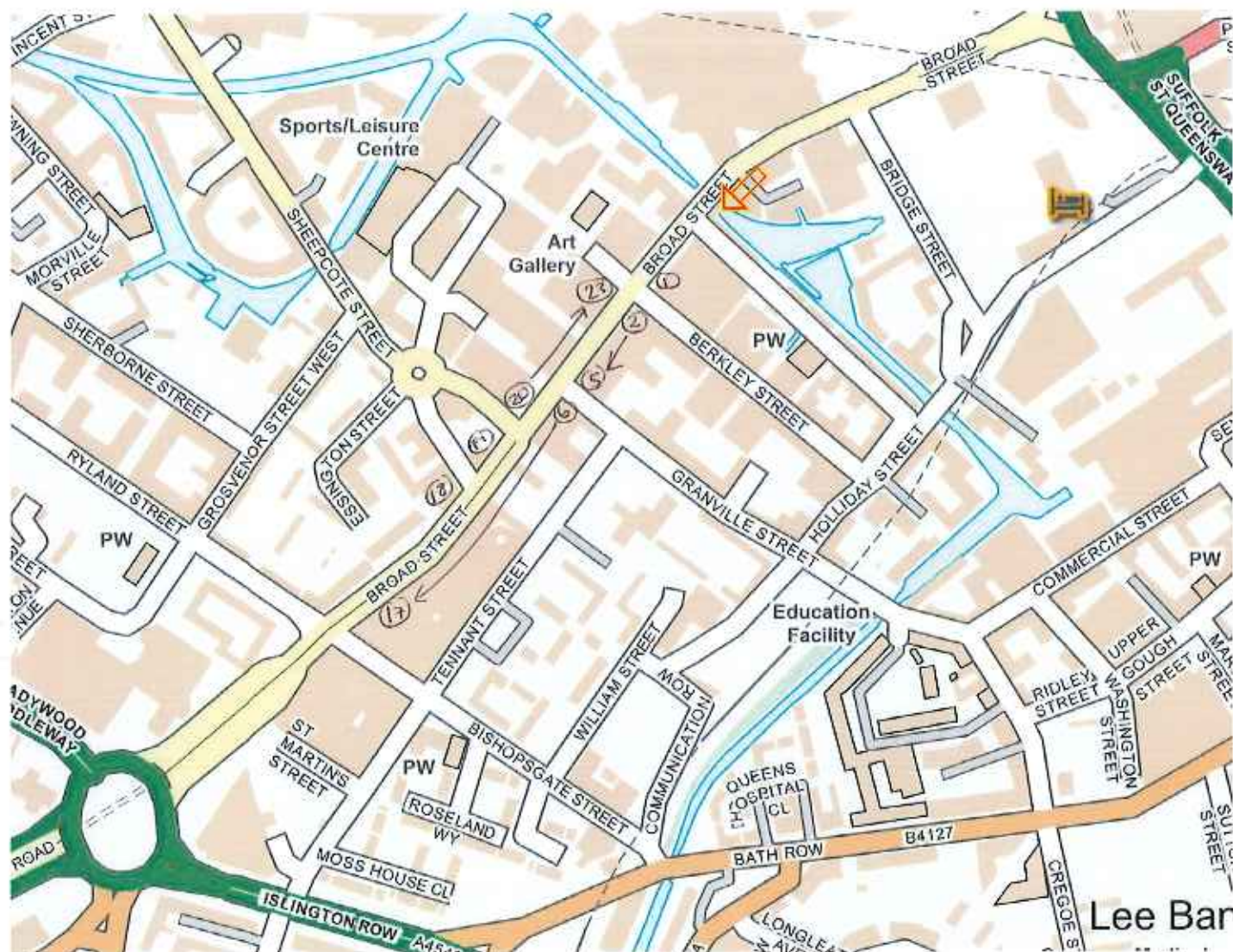
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SECTION B: SUPPORTING DOCUMENTS

TAB 1:

BROAD STREET: LOCATION & OTHER BUSINESSES

TAB	DOCUMENT
1.1	Map & List of Businesses
1.2	Photos of Businesses



All Technology © Copyright: Streetmap.co.uk/Streetmap EU Ltd 2016
This site includes mapping data licenced from Open Street Map, Ordnance Survey & Bartholomew.

1. ROCKET CLUB	18 ZARA'S
2. PUSHKAR	19 THE BANK
3. PLAYERS	20 ELEMENTS BAR
4. FIGURE OF 8	21 SAINSBURY'S
5. O'NEILS	22 COAST TO COAST
6. TRAVELODGE	23 POP WORLD
7. LEE LONGLANDS	
8. BUILDING SITE	
9. SUGAR SUITE	
10. VELVET MUSIC ROOMS	
11. HAMPTON HILTON	
12. BIERKELLER REPUBLIC	
13. LEGS 11	
14. PIT STOP	
15. MISCHLAS / CYCLONE	
16. EAST EAST	
17. GROSVENOR CASINO	





1



2



3



4



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8



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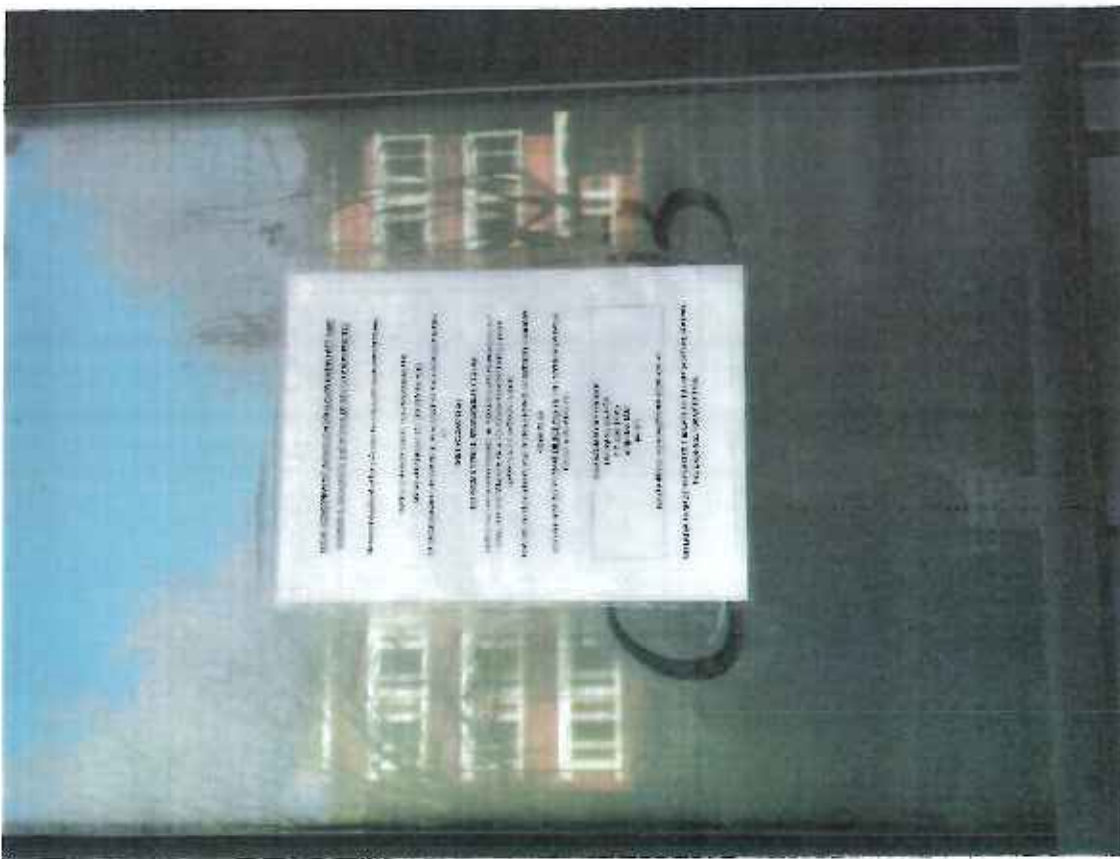
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13,14,15



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19



21



21



22,23

TAB 2:

PROPOSED LICENCE CONDITIONS

TAB	DOCUMENT
2.1	Proposed Licence Conditions

Opening

1. The premises shall not be open to the public between the hours of 07:00 and 19:00.

Personnel and training

2. Daniel Parma shall have no involvement in the day to day management of the premises.
3. No-one who was a Director at any time in Clear Blue Sky Thinking Limited shall have any involvement in the premises or the business.
4. There shall be no change in the shareholding or corporate control of the licensee without 28 days prior notification to West Midlands Police.
5. The designated premises supervisor at the premises shall hold the BII Level 2 Award for Designated Premises Supervisors.
6. The name of the manager on duty shall be displayed in the reception area of the club.
7. A personal licence holder shall be on the premises at all times it is open to the public.
8. The person employed as the bar supervisor shall be the holder of a personal licence.
All bar staff shall either hold, or within 4 weeks of commencing employment take and pass, the BIIAB Level 1 Award in Responsible Alcohol Retailing
9. CCTV shall be installed and maintained so as to cover all places in the premises to which the public has access save for the toilet areas. All cameras shall continuously record whilst the premises are open to the public and recordings shall be kept available for a minimum of thirty days
10. A member of staff who is fully trained in the use of the CCTV system shall be on duty at all times when the premises are open until the premises are clear of customers.
11. A CCTV monitor shall be maintained in the reception area for immediate viewing by any authorised officer of the Council or West Midlands Police.
12. Door supervisors working inside the premises shall be furnished with tablets showing CCTV of the private dance areas.
13. There will be continuous monitoring of the CCTV at the premises at all times when customers are present including the dance areas. The monitoring position will itself be covered by CCTV to demonstrate continuous monitoring. The person undertaking monitoring ("the CCTV controller") will have the facility for radio communication with the door team and management as to any interventions required.
14. A record of interventions with dancers and / or customers, together with action taken, will be maintained. The record of interventions shall be counter-signed by the manager or duty manager on a daily basis.
15. The manager on duty shall undertake daily dip sampling of CCTV to ensure that the no touching rule is observed. A daily record of such dip sampling shall be maintained.
16. The premises will provide copies of any CCTV recordings upon request by any authorised officer of the Council or West Midlands Police within 24 hours of the request.

Performers, performances and pricing

17. All performers at the premises shall have attained the age of 18 years.
18. All payment for entertainment takes place before the entertainment is provided.
19. Price lists for all beverages shall be placed on each table and bar for the information of customers.

20. A tariff for performances will be displayed in the dance areas, on tables and at the bar and cash desk.
21. No credit or debit card payments will be taken by performers.
22. No credit or debit card payments may be made in the private dance areas
23. All credit or debit card payments for performances exceeding £100 will be made at a designated cash desk, which will be well-lit and monitored by CCTV. All such payments must be signed for by the customer.
24. Credit and debit card payments may only be made to the licensee.
25. All alcohol supplied at the premises must be purchased from the bar(s)
26. Prominent notices shall be displayed at the club entrance, in the bar area, on all tables, in all private dance areas and WCs stating that:
 - a. there shall be no contact between performers and customers during a performance;
 - b. customers must remain seated during performances;
 - c. customers must not film any performance or use their mobile phone during any performance;
 - d. customers who do not observe these rules will be asked to leave the club.
27. Customers must be informed of the above rules at the point of entry into the club.
28. Performers may not give their contact details to customers or take contact details from customers. Breach of this rule shall result in termination of the performer's contract.
29. Performers may not offer sexual services. Breach of this rule shall result in termination of the performer's contract.
30. Each performer shall be subject to an induction process whereby they are trained in the licence conditions, codes and rules in force at the premises. The performer shall be given a copy and shall sign for receipt and understanding of the said codes and rules. All performers shall be subject to regular refreshment of the training on at least a 6 monthly basis. A record shall be maintained of all training provided.
31. The premises shall employ a house mother to supervise the performers and oversee their welfare.
32. Each area containing private dance rooms at the premises shall be covered by CCTV cameras and monitored by an SIA-licensed supervisor
33. Each private booth and VIP room shall have CCTV coverage and where there is a door this shall not be locked at any times.

Drugs

34. The premises shall have a written drugs policy which shall include the following:
 - a. A zero tolerance approach to substance misuse by customers, staff and performers.
 - b. Any person suspected of being under the influence of drugs will not be admitted, or if they are on the premises ejected immediately.
 - c. Any drugs found will be confiscated and stored in a drugs safe until they can be safely collected by the Police or other suitable authority.
 - d. Random searching of staff and performers and termination of contract in case of possession of illegal drugs.

Recording of incidents

35. The premises shall maintain an incident log, which shall record:

- a. All crimes reported at the venue by a member of the public, a performer or a member of staff.
- b. Any complaints made by customers or performers.
- c. Any breach or alleged breach of the house rules by a member of the public.
- d. Any breach of the conditions by a performer, together with action taken by management.
- e. Any removal of a person from the premises.
- f. Any faults in the CCTV system.
- g. Any visit by a statutory authority or emergency service.

Compliance audit

36. An independent compliance auditor, to be instructed and paid for by the licensee, must carry out a compliance audit of the premises when sexual entertainment is offered at the premises. Such compliance audits to be conducted at least quarterly. The compliance audits must not be pre-arranged with the licensees or their employees or agents. A copy of the compliance audit, signed and dated by the compliance auditor, must be kept at the premises and made available to authorised officers of the licensing authority and police immediately upon request.

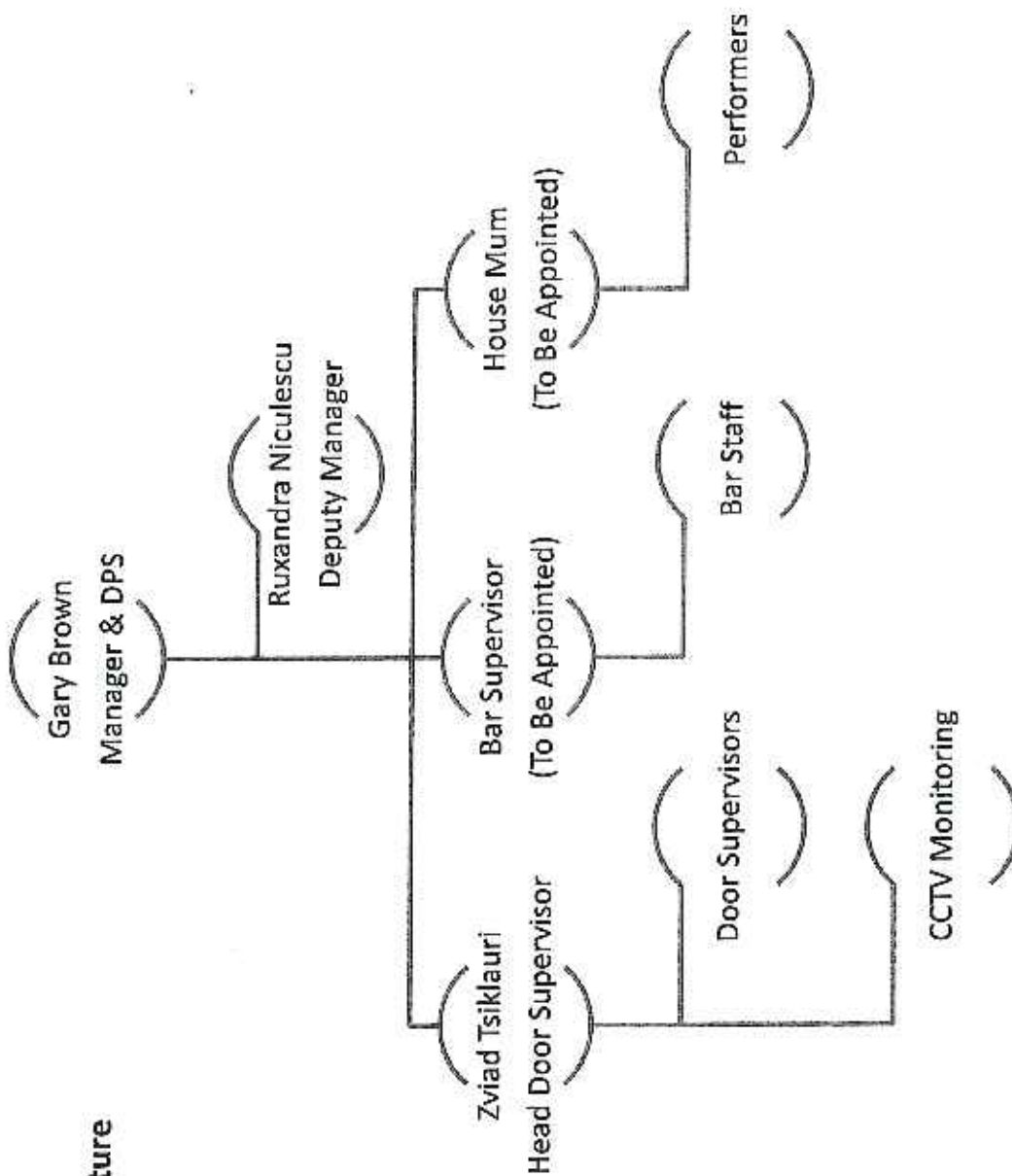
TAB 3:

PARADISE CITY POLICIES

TAB	DOCUMENT
3.1	Proposed Management Structure
3.2	Etiquette & Club Rules
3.3	Policies & Documents
3.4	Risk Assessment
3.5	Transaction Acknowledgement Form
3.6	Training Questionnaire

Management Structure

March 2019





Etiquette & Club House Rules Book

Please take time to read your introduction pack.

It may help you feel more confident on your first shift, if you know a little about Paradise City.

Any questions you may have after reading it can be discussed with any of the management team.

Good luck we hope you'll settle in quickly and enjoy your time at Paradise City.



WHAT MAKES A GOOD LAP DANCER

PLEASE DO THIS:

- Greet customers in a warm and friendly manner, a smile works wonders.
- You are an entertainer and you are on show as soon as you are in the club
- Make sure your appearance is immaculate, Hair, Nails, Make Up, Dress etc.
- Show self-confidence (Even if you don't feel it)
- Have a sense of humour
- Pay full attention to the customer at all times, A conversation is often more important than the dance and it helps the customer to relax and makes them feel that they are more than just a £20.00 note.
- These may sound like obvious attributes, but when you're tired or fed up, you cannot let this affect your work or dancing performance.
- The customer is expecting the above and if you can't deliver, you can't earn.
- Do not; give the impression that you are too busy to talk.
- Do not; show a negative attitude.
- Do not; neglect your appearance.
- Do not; talk about other girls, customers or the club in a negative way.
- Do not; argue with customers or other dancers.
- Do not; talk about your private life.
- Do not; moan or complain unnecessarily about customers or other dancers.
- Do not; approach a customer as soon as he walks through the door.

THE LAP DANCE EXPERIENCE

- A lap dance is a personal experience for both the customer and yourself; the customer should feel that you are only interested in them.
- Please make sure you get paid before you start a dance.
- The customer may not have the money or may refuse to pay.
- GETTING PAID IS YOUR RESPONSIBILITY.
- A good dancer will hold eye contact for as much of the dance as possible, follow your hands with your eyes and then back to the customer.
- Do not look around the room for your next customer whilst doing your dance.
- Ladies are using lap dancing clubs more and more with their partners, you should treat them with the same courtesy and professionalism as our male clientele. They appreciate a good female body as much as a man and are often quite intrigued by your dancing. They are paying customers, the same as men, please make them feel welcome.
- There are clocks in the dance rooms, discreetly check the time; do not keep checking your watch.



THE APPROACH

- Allow the customer to come in buy a drink and pay for it before you approach him.
- Approach the customer with a smile and ask if you can join them.
- Introduce yourself with a handshake.
- Make polite conversation if the time allows.
- After 3-5 minutes of chat ask the customer if they would like you to dance for them, if they say no, ask is there anyone else that they would like to talk to or have a dance from, if he points someone out, let them know and move onto the next customer. This is dancer etiquette; remember another dancer will do the same for you if you show them this courtesy.
- If a customer says that they don't want a dance, do not be rude or pass comment, be polite, be professional and move on.
- When you finish, give them a kiss on the cheek and say goodbye and thank you.
- Sit down and put your clothes back on, then either chat or leave the dance area, do not leave the customer sitting unattended in the dance room.
- You can still refer the customer to another dancer at the end of your dance if you wish, if he does not want another dance from you straight away.
- Your dance is only three minutes long, so with the chatting at the beginning and the end, you are only spending about 10 minutes with each customer.

THE DANCE

- This is a chance to showcase yourself.
- Make your stage show sexy, exciting, entertaining and erotic.
- You'll secure a few dances from customers who see your routine.
- You are performing to an audience and your aim should be to get their attention.
- You know what the customers want to see, sexy, erotic, fun and approachable girls.
- Impress them on stage and its money in the bank.
- Many of you have two girl routines, you should practice them continuously, this is great if you are worried about being on stage alone.
- An unrehearsed routine however, looks bad and won't earn you any money.
- The more effort you put in the more you will get out.
- You will be introduced by the DJ, walk on stage with confidence and a smile.
- Act sexy, make eye contact with individual customers to make them feel special.
- Perform your pole tricks with as much sex appeal as possible.
- Wear sexy outfits.
- Use the whole of the stage during your show.
- Never go through the motions because you have to.
- Never try new tricks on the pole without a rehearsal.
- Dancers who earn well, take pride in their appearance and their job.
- This means constant practice and close attention to detail.
- Follow these simple rules and you should earn good money.



DRESS CODE

- All dancers should wear dresses until midnight unless prior agreement with the management, for example themed nights.
- These should not be transparent and should not be short in length.
- No bikini style outfits with matching shorts should be worn.
- Please ensure that your dresses / outfits are clean and well presented.

DRESSING ROOM ETIQUETTE

- Please keep the dressing room clean and tidy, put rubbish in the bins.
- If bottles and glasses are taken into the dressing room, please take them back out when you leave.
- Please do not leave your valuables like money, mobile phones etc. on display, they are your responsibility, please use the lockers provided.
- Do not borrow items from the other girls without their permission, as it will cause unnecessary friction.
- Security cameras are installed through the building for your security and protection.

CUSTOMERS

- It is strictly forbidden for dancers to fraternise with Paradise City customers.
- Telephone numbers must not be exchanged with customers.
- The club considers this a serious offence, if a card is given out by a customer, for example folded up in a note, it must be seen to be disposed of to avoid unnecessary action.
- Dancers at Paradise City should never arrange to meet customers after work.
- You should never receive money from a customer on the understanding that you will meet him outside the premises even if you have no intention of doing so, this is procuring money by deception or procuring money for sex both are illegal and will never be tolerated by the club.



ALCOHOL AND DRUGS

- Drugs will not be tolerated.
- Dancers may drink in moderation
- Dancers are requested not to carry or drink from a bottle, use a glass.
- Any dancer suspected of being drunk will be sent home.
- There are those of you who can drink all night without it showing, and there are those that can't, you know who you are.
- Never drink so much that you are not in control of your dance and your customer, if you're drunk you may not think you're slurring your words and stumbling, but chances are, you probably are.
- There is nothing more unattractive than a girl who is drunk. This is a fantasy and you are supposed to be their ideal woman.
- No one wants a drunk slurring woman to dance or talk to them.
- Please limit your alcohol intake or you will be sent home.

PARADISE CITY WILL NEVER TOLERATE DRUG USE.

- Anyone caught using, supplying or believed to be under the influence of drugs will be sacked without hesitation.
- We are not prepared to risk everyone's jobs for the sake of a few who put the license of Paradise City in jeopardy if you bring drugs into the club.
- If you are found to be in possession of a controlled drug. You will be dismissed with immediate effect.
- If you are found to be in possession of drugs with intent to supply to assist in the supply or distribution of controlled drugs, you will be dismissed with immediate effect and the police will be called.
- We appreciate that you do a difficult job, but if you need drugs to get you through, then you need to re-assess your choice of work.

PARADISE CITY OPERATES A ZERO TOLERANCE POLICY TOWARDS DRUGS

PAYMENT OF FEES & DISCIPLINARY PROCEDURE

- House fees must be paid on arrival.
- Receipts for house fees and any additional charges are provided by management.
- Breaching the club rules will result in disciplinary action being taken and may result in instant dismissal from the club.
- Breaching the standard conditions of our license (which you will be made aware of on your induction) will result in dismissal from the club.



DANCES

- A dance will last for one song (approximately 3 minutes)
- The customer is not allowed to touch the dancer, politely tell the customer to stop or you will end the dance if he / she continues.
- If the customer requests you to continue for another dance, you must replace your G string before you continue into the next song and any other subsequent songs.
- Chewing gum whilst working is not permitted
- When using mobile phones whilst in the club please use the designated areas.
- You are not allowed to use a mobile phone in view of customers.

OTHER ISSUES

- No one should leave the club without a member of management being made aware.
- Dancers for their own security will be escorted to their cars at the end of a night or be seen getting to a pre booked taxi by one of the management or security.
- You must not have your boyfriend / husbands in the club when you are working.

CUSTOMERS, COMMENTS AND BEHAVIOUR

- It is unacceptable for customers to be rude to you, the reverse also applies.
- Do not swear at customers, walk away and let management or security handle the problem.
- If you have a problem with a customer, please inform management or security and let them deal with it.
- You should not attempt to deal with it yourself as it can make the situation far worse.
- If you are in any of the private rooms and feel unable to deal with a customer, either leave the room and report it to management or security failing that use the wall mounted panic alarm.
- Do not put yourself at risk.



The policies set out by the management
for the day to day running of Paradise
City, Broad Street, Birmingham.

Paradise City



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Proposed Changes:

There are doors on the entrance to the private performance areas. These doors will be replaced with curtains allowing easy and unobstructed access into the private performance areas.

Even though the current CCTV system has been approved by the Police, the system will be enhanced allowing remote/portable monitoring for the DPS / Responsible Person and a viewing station will be available close to the main entrance at reception, but hidden from public view.

The DPS portable system will allow monitoring of the CCTV from anywhere inside the premises giving greater control and access to the CCTV and allowing faster response to any issues that arise during the opening hours.

The business has been registered with the I.C.O.

Induction Policy

All members of staff and performers to undergo an induction with the DPS.

The induction is not limited to the following, but must include the club rules, SEV Standard Conditions, emergency procedures and staff safety.

Performers will be given additional information regarding the club rules that are specific to their role.

Bar staff will be given additional information that covers the sale of alcohol, 'challenge 21 / 25' and refusal to serve.

All staff will understand what to do if they observe staff, performers or customers not adhering to the club rules and SEV Standard Conditions.

A copy of the club rules will be given to each new performer with copies available on request and displayed in the performers changing rooms.

Admission Policy

When a customer wishes to visit or leave the premises, the four licensing objectives should be considered:

The prevention of crime and disorder

Public safety

The prevention of public nuisance

The protection of children from harm

A 'Challenge 21' approach will be taken when admitting customers into the venue.

The door supervisor(s) will point out the signs explaining the club rules and verbally note the 'no touching' and 'no photography' rules.

Subject to the following rules all visitors to the premises will be admitted irrespective of their colour, race, religion, sex or disability provided that:

They are over the age of 18 and can provide photographic proof of age in the form of driving license, passport or government / local authority approved proof of age card.

They are not under the influence of drugs or alcohol.

They are dressed smartly and not wearing shorts or sportswear.

They abide by the house rules.

They don't refuse to be searched.

They have not been previously banned.

They are not subject to an exclusion order.

Their behaviour at the time of admission is not likely to cause a disturbance, create disorder or be offensive to any customer, staff or performer.

Search Policy

A notice will be displayed at the entrance of the premises explaining the search policy is a condition of entry.

Customers may be allowed to enter the premises on the condition that the door staff are permitted to search them. If they refuse consent, then they should be refused entry.

The door supervisor will explain what they are searching for – illegal drugs, weapons and any other items unsuitable to be brought into the premises.

Searches will be carried out courteously and as efficiently as possible.

Male door supervisors may ask female customers to empty the contents of their handbags or pockets onto a table but otherwise should not carry out a "pat-down".

Seizures of illegal drugs or weapons will be recorded and the Police notified (See drugs policy)

Customer Conduct Policy

We operate a no touching rule. Anyone who does not abide by this rule will be asked to leave the venue.

All customers are expected to pay an entry fee at reception before entering the club.

All customers are expected to be dressed smartly and in accordance with the dress code. The club runs a smart casual dress code; we do not allow scruffy trainers, shorts, vests, or scruffy jeans.

Door Staff and Management have the right of refusal if customers seem intoxicated by drink or drugs.

Customers are expected to treat the staff and performers respectfully and courteously at all times.

The use of cameras, phones or recording equipment to take photographs or videos is not allowed inside the premises.

Shouting, swearing, heckling or disrespectful actions/behaviours are not permitted.

Customers are not permitted to throw money at the performers.

During a private performance customers are to be seated throughout the performance and are not allowed to touch the performer.

Customers are not allowed to exchange personal contact details with performers.

Customers are expected to consume alcohol in moderation or they will be asked to leave the premises.

We run a zero tolerance drugs policy in this venue. Anyone found with drugs in their possession will be ejected from the club and/or reported to the police.

All customers must be seated at all times during dances in booths and VIP rooms.

Performer Policy

All performers must be over the age of 18 years old.

Performers must only perform on the stage area or the designated private booths or VIP areas. There must be no physical contact between performers.

Customers must not touch the breasts or genital area of performers. Performers will not directly or indirectly touch the breasts or genital areas of customers.

Any performance will be restricted to dancing and the removal of clothes. There will not be any other form of sexual activity or stimulation which, for the avoidance of doubt, includes kissing.

Sex toys must not be used and penetration of the genital area by any means must not take place.

Customers are not permitted to throw money at the performers.

Performers Welfare Policy

Dancers and performers shall be provided with secure and private changing facilities.

Dancers and performers shall be provided with private toilet/hand washing facilities.

Dancers and performers must sign in and out at the beginning and end of their shift providing management with a list of performers in case of an emergency.

Dancers and performers can deposit any valuables with the management by way of a sealed/signed envelope, to be kept in a safe upon their arrival at the club and returned at the end of their shift.

Each new dancer and/performer will be given a full and detailed induction upon their commencement of employment at the club. This will include all club rules, conduct, code of conduct, premises familiarity, fire evacuation procedures and health and safety. This will be documented by way of the company dancer/performers contract.

At the conclusion of a shift all performers will be provided with a company nominated taxi or escorted to their own transport by a member of security staff or management.

All entrances to private areas to which members of the public are not permitted access shall have clear signage stating that access is restricted.

The designated smoking area for use by performers shall be kept secure and monitored by door staff. Dancers must be fully covered when using this area by means of a dressing gown, robe or be fully clothed.

Private booths will not be secured by doors. Access to these areas will be easy to access by door staff and management so that paid private performances can be easily monitored.

There must be a minimum of one member of security staff and or management on any floor where performance of sexual entertainment is taking place.

A performer notice board will be displayed in the changing area. The board will show contacts and names of charities and organisations that can offer help and advice regarding sexual health, domestic violence, human trafficking, taxation etc.

The GMB trades union, one of the largest in the UK, has a Branch for dancers and others who work in adult services and entertainment. This offers specialised support and benefits, as well as all the services available to all GMB members.

Member benefits include:

Representation at work and advice on work-related issues by someone who knows the business and is on your side.

Legal advice on any subject.

Advice on issues around self-employment and your rights at work and specialised legal advice on work-related issues.

Representation on criminal matters by a firm with award winning client care; advice about finding an expert witness if for any reason you are taken to court.

Financial support with training or further education.

Immigration and visa advice.

Health insurance.

Tax advice.

Performers' Third Party Liability insurance.

Protection for you and your family regarding accidents and personal injury; and discounts on goods and services including;

Open University courses;

Accountants with expertise in supporting people paid in cash.

To find out more, go to <http://www.qmb.orq.uk/> or call 020 7697 1058.

Disciplinary Policy

The club rules and the SEV conditions are in place to promote a safe and happy environment for both performers and customers.

The actions of one person breaking the rules can have consequences for others and the club. Any breach of the club rules, or Performers code of contact will result in disciplinary action being taken against the performer.

A breach of the standard conditions will result in the performer being dismissed.

Whilst the disciplinary procedure is in place to deal with inappropriate or illegal behaviour, every effort will be made to educate the offender before or during the process.

All performers are reminded of the club rules, standard SEV conditions and performers code of conduct which was given to every performer and signed for on the staff induction.

The following disciplinary action may be taken against a performer for breaching the rules.

Verbal warning – A record of the verbal warning will be kept on the performer's staff file for 6 months with a written notification of the warning being issued. The performer will be referred back to the induction policy.

Written warning – Will be given if two verbal warnings are accumulated within a six month period. The written warning will be documented on the performer's staff file for six months. The performer will be referred back to the induction policy.

Final written warning – For a breach of the rules after a written warning, a performer will be issued with a final written warning and documented on the performer's staff file for six months. The performer will be referred back to the induction policy.

Suspension – After the above warnings have been exhausted, the performer will be suspended from working at the club. The suspension period will be for a three months period. If the management decide the performer can return to work after the suspension the induction process will begin again.

The management reserves the right to go straight to step four of the disciplinary procedure for intentional and or repetitive breaching of the club rules or in the case of a breach of the standard conditions.

CCTV Policy

Signs will be displayed prominently throughout the venue informing the public the CCTV recording is taking place on the premises.

The signs will be placed at the reception so they can be seen on entry, private performance areas and public areas throughout the premises.

Signs will be placed in performer and staff areas.

The CCTV system in the premises has previously been approved by the Police.

The current system will be enhanced with remote monitoring. This will be in the form of a portable device that can be carried or worn on the arm of the DPS / responsible person.

An additional viewing station will also be available in the reception area in the form of an iPad or tablet allowing authorised officers to view the CCTV system if requested.

The Police will be invited to check the CCTV system and make any recommendations to improve the current system.

The CCTV system will record continuously while the premises are open to the public.

Recordings will be kept for a minimum of 28 days.

The DPS or responsible person will be trained in the use of the CCTV system allowing them to provide copies of CCTV to authorised officers when requested.

The location of the CCTV cameras are shown on the premises layout document and submitted with this policy.

The company is registered with the ICO and will follow the guidelines laid down by the ICO.

A person has been nominated to ensure the rules laid down by the ICO regarding the use of CCTV recording equipment are adhered to.

All requests of CCTV images will be recorded in a CCTV incident book noting the date and time of the request, the person and authority making the request and the date and time the request was completed.

The CCTV log book will also show that routine visual inspections of the equipment have taken place.

Any failures, breakdown or issues surrounding the CCTV system will also be logged in the CCTV log book. Any part of the CCTV system not working correctly will be reported to the police with the date and time of the report being logged.

Drugs Policy

We operate a zero tolerance drugs policy.

Anyone found in possession of, using or dealing drugs will be reported to the police and the incident will be logged.

Drug seizures will be recorded in an incident log kept at reception. The log will note the day, time, members of staff involved in the seizure and a brief description surrounding the seizure.

Drug seizures will be stored in a secure safe and the police will be contacted to arrange collection. A collection log will be kept showing the date and time the police requested to collect the drugs and the officer and staff member dealing with the collection.

A record of the collection will be made and kept on the incident log.

Staff Deployment Policy

Staffing levels will change to adequately deal with busier trading times at weekend.

The minimum staff on a quiet trading night will comprise:

DPS / Responsible Person, one bar staff, two door supervisors, one DJ.

On busier trading nights the minimum staff on duty will comprise:

DPS / Responsible Person, three bar staff, three door supervisors, one DJ.

Staffing levels will be monitored to ensure more than adequate supervision of the premises during opening hours.

The Police will be asked to make recommendations regarding how many door supervisors are required.

Performer Disclaimer

I hereby warrant, represent and certify the following:

I have never been arrested and/or convicted for the sale of any illegal drug. I have never been arrested and/or convicted of any charge in relation to acts of prostitution. I understand that violations of law could occur if I was to handle a customer or a customer was to handle me. I agree to refrain from handling customers or allowing them to handle me and performing in such a manner that would be considered obscene or otherwise illegal or unlawful and I agree to comply with the rules of the club which have been adopted to ensure compliance with all existing national and local laws. I understand that if these rules are broken it will result in the dancer being escorted from the club.

I agree that I may be searched randomly and my refusal may result in immediate termination of contract for services and removal from the club.

I am eighteen years or older, I agree that giving false information on this application will be reason for me being unable to occupy space at the club. I understand that I will not be an agent or employee of the club and that Paradise City is not responsible for unlawful acts committed by me.

I hereby declared that I have the status of a self-employed person, and shall be responsible for all income tax liabilities and national insurance or similar contributions and I hereby indemnify Paradise City in respect of income tax or national insurance or similar contributions. I will provide Paradise City with my accountant's details.

I have adequate and appropriate insurance to include a valid public liability certificate, a copy of which shall be available to the company upon request. And hereby indemnify the company in respect to any claims.

I understand that the company is unable to accept responsibility for damage or loss of personal property.

Signed (Performer).....Date:.....

Print Name.....

THIS CONTRACT FOR SERVICES is made on the day of

BETWEEN: (1) Paradise City ("The Club") and

(2) ("Dancer")

DANCER

By signing this contract you are confirming that whilst you are providing dancing services to the Club you are doing so as a self-employed Dancer.

You are obliged to:

- Act in a professional manner and in accordance with the club's code of conduct at all times.
- Make all reasonable attempts to work to the Club's opening times.
- Observe Health and Safety regulations regarding working hours and site security.
- Be responsible for the cost of repairs for damage to property of the Club or any third party.
- Pay your own Tax and National Insurance.
- Pay a house fee, as agreed with the club, for each session services are provided.

You have the right to:

- Leave the site without permission (although you should notify the Club for Health and Safety reasons).
- End this contract without giving notice.
- Take legal advice before signing this contract, and to have a copy of it.

You do not have the right to:

- Holiday pay or sick pay.
- Hold yourself out as being an employee of the Club.

By signing this contract you are agreeing to be bound by its terms and you are agreeing that these terms will govern the working relationship between you and the Club.

You are also agreeing that the terms of this contract represent the whole contract between you and the Club with the exception of any verbal negotiation about price or location of the services.

Club

The Club intends that in this working relationship you are an independent sub-contractor

The Club is obliged to:

Provide all of the equipment used in the club either by employees or sub-contractors as the Club takes its Health and Safety responsibility seriously.

The Club is not obliged to:

- Offer you any work. They may offer you the opportunity to provide your services but they are not obliged to.
- Pay any substitute or help hired by you to undertake the work.

The Club has the right to:

- End this contract without giving notice.
- Take legal advice before signing this contract

The Club does not have the right to:

- Control the methods you use when you provide your services to the Club providing they apply with the terms and conditions of our licences and code of conduct
- First call on your services - they cannot expect you to drop whatever you are doing to come and provide your services to them.

By signing this contract the Club is agreeing to be bound by its terms and you are agreeing that these terms will govern the working relationship between the Club and you.

The Club is also agreeing that the terms of this contract represent the whole contract between you and the Club with the exception of any verbal negotiation about price or location of the services.

General

This Contract is governed by the laws of (England, Wales, Scotland or Northern Ireland) as appropriate and is subject to the non-exclusive jurisdiction of the (English, Welsh, Scottish, Northern Irish) Courts.

Club: Paradise City

Signed

Dated

Dancer

Signed:

Dated

Breach of any clause or clauses in this contract will not void or annul this Contract for Services as a whole in any circumstances.

	A	A		B	
	What is the risk: A failure to comply with the conditions listed below.	RISK RATING	How the condition will be implemented and managed.	RISK RATING	The policies that underpin the management of the condition.
A	SEV CONDITIONS				
1	The licensed premises shall not be open or used for the purposes for which the licence is granted except between the hours prescribed within the licence or those hours of operation determined by the Licensing and Public Protection Committee	1	The club opening hours will be displayed in staff areas with the club manager ensuring that the permitted trading hours are adhered to. The DJ will give notice of drinking up times, last orders and closure to the	1	The allowed trading times as stated on the premises license. The club opening and closing times are subject to change at the discretion of the management but will always fall within the prescribed hours of the license.
2	Save for the entrance lobby, the interior of the premises shall not be visible to passers-by and to that intent the licensee shall ensure the area of the premises in which relevant entertainment is offered shall not be capable of being seen from outside the premises.	1	The interior of the property is on the first floor and only the entrance lobby is visible to passers-by. First floor windows are tinted and too high to be seen by passers-by.	1	N/A

3	<p>The windows, doors, fascia board, walls and all external parts of the premises including the roof shall not contain any form of writing, sign or display save for: (a) The address of the premises.</p> <ul style="list-style-type: none"> • (b) The licensed name of the premises. • (c) A notice stating the opening hours of the establishment. • (d) In the case of a licence granted to a body corporate: • (i) If the premises name is not the same as the full name of the body corporate then such corporate name and; • (ii) If the premises are also the body's registered office for the purposes of the Companies Acts then an indication in a form acceptable to the company that such is the case. 	1	Photos included with license application to show outside of premises. No changes to the exterior building will be made once approved.	1	N/A
4	The lettering used in respect of such permitted items shall be of such colour and style as may be approved by the Council.	1	As Above	1	N/A
5	The licensee shall not permit the display outside of the premises of photographs or other images, which indicate or suggest that relevant entertainment takes place in the premises.	1	As per Part 3 Above	1	N/A
6	At the time of granting the licence in respect of the premises the Council will authorise a name referred to as "The Licensed Name" by which it is intended that the premises shall be known and the licensee shall ensure that the premises are known solely by that name and by no other, save as provided for by the paragraph below.	1	The premises was previously named 'Legs 11' The new proposed name is 'Paradise City' to reflect the change in venue management and DPS and operating procedures.	1	N/A
7	To change the licensed name, an application shall be made to the Council not less than 28 days prior to the proposed change and the Council shall have an absolute and unfettered discretion to allow or refuse such change.	1	The director, DPS and management are aware of this condition and accept it as a condition of the license.	1	N/A
8	a) A copy of the licence (two pages) shall be suitably framed and exhibited in a position that can easily be read by all persons entering the premises. b) The conditions of licence and all such documents listed as Appendices to said licence shall be retained in a clean and legible condition and immediately available for inspection by anyone who so requests.	1	The Licence will be displayed in the foyer area. The same area will also display the customer rules, DPS, authorised and responsible personnel, search / drug policy and age policy.	1	N/A

9	The licensee shall retain a copy of a form signed by each employee and performer confirming that they have read and understood the licence and conditions. The copy shall be retained for a period of six months after they cease work at the premises. A copy of the licence and conditions shall be given to each performer	1	An example of a staff file has been submitted showing the information that will be required for all members of staff and performers.	1	Induction Policy
10	The licensee or a responsible person over 18 years of age nominated by them in writing for the purpose of managing the SEV in their absence shall be in charge of and upon the premises during the whole time they are open to the public.	1	See Part 8. The DPS will be named along with the responsible persons at the entrance foyer. A responsible person file will also be kept at reception with photos so these people can be identified easily by authorised officers.	1	N/A
11	The written nomination referred to in condition 10 above shall be maintained in a daily register, kept on the premises and made continuously available for inspection by an officer authorised by the Council or police officer.	1	A licensing manual will be available at reception for inspection by authorised officers, the Council or police.	1	N/A
12	The person in charge shall not be engaged in any duties that will prevent them from exercising general supervision and they shall be assisted as necessary by suitable adult persons to ensure adequate supervision.	1	A deployment plan showing where staff are located within the premises has been submitted. The person in charge will not take on other roles or jobs that will prevent them from supervising the venue. The DPS will have access to CCTV by means of a mobile device on him.	1	Staff Deployment Policy / CCTV
13	The licensee must ensure that there is a current insurance policy in force to cover the performers whilst the premises are open and that a copy is displayed in areas where all staff have access.	1	A copy of the insurance certificate will be placed in the staff area and also in the licensing manual in the foyer for inspection (See Part 11)	1	N/A
14	The licensee shall keep and maintain at the licensed premises a written record of the names, addresses, and copies of photographic proof of age documents of all persons employed or performers permitted to operate within the licensed premises whether upon a full or part time basis and shall, upon request by an authorised officer of the Council or police officer, make such records available for inspection to them. (see Conditions regarding Door Supervisors)	1	A staff file for each individual will be kept and available for inspection. (An example file has been submitted) All files will be ordered and labelled making the information easily accessible.	1	Performer Policy and staff employment records

15	Condition 14 does not relate to persons engaged to carry out repairs or provide services from external companies to the premises, however, such persons must be aged 18 years and over if the premises are open for the purpose of providing sexual entertainment.	1	The rules regarding entry into the venue will apply during trading hours.	1	
16	The licensee shall ensure that all persons employed or permitted to work within the licensed premises hold the appropriate rights to work and shall keep copies of any documentation used to verify the details of these rights where necessary.	1	A structured personal file will be kept for each individual and available for inspection. See Part 14	1	Induction Policy / Staff Employment Records / Performer Policy & Disclaimer
17	The licensee shall maintain a register of the names, addresses and dates of birth of such person or persons (whether employees or otherwise connected with the business) who have authority to manage the premises in the licensee's absence.	1	A letter of delegation approved by the Council and police will be kept in the licensing manual at reception naming authorised persons.	1	See above
18	Where the licensee is a body corporate or an unincorporated body any change of director, company secretary or other person responsible for the management of the body is to be notified to the Licensing Authority	1	Noted. Additional conditions are being proposed to support this	1	Draft proposed conditions
19	Where the licensed premises is a vessel or stall, the licensee shall not move the licensed vessel or stall from the location specified in the licence unless a variation application is submitted for the Council's determination giving not less than 28 days notice. n.b. this requirement shall not apply to a vessel or stall which habitually operates from a fixed location but which is regularly moved (whether under its own propulsion or otherwise) from another place such location as is specified in the licence.	1	N/A	1	
20	Alterations or additions, either internal or external and whether permanent or temporary, to the structures, lighting or layout of the premises as shown on the plan, including any change in the permitted signs on display shall not be made except with the prior approval of the Council.	1	Plans for proposed layout have been submitted with the application. No changes will be made after without the prior approval of the Council.	1	
21	Any club rules imposed on the performers shall be displayed in a prominent position within the premises for all employees to have easy access whilst at work	1	These are to be displayed in performers changing area and as part of induction process	1	Induction Policy / Performers Policy

22	A copy of the club rules shall be provided to performers engaged by the premises by means of a written contract signed by the recipient. Copies of the same must be retained on the premises and produced to an authorised officer of the Council or police officer on request. Receipts or records of payments received should be provided to performers where "house fees" are charged or when any fines are issued.	1	All performers to be over the age of 18. A copy of the club rules will be given to each performer, signed for and retained on the individuals staff file. A copy will also be displayed in the performers changing area.	1	Performers Policy / Club Rules / Induction Policy
23		1	Receipts are issued for any payments made. No fines will be used	1	
24	No person under the age of 18 shall be permitted to be on the licensed premises when sexual entertainment is provided. A notice shall be clearly displayed at the entrance to the premises in a prominent position stating that "No person under 18 will be admitted when sexual entertainment is being provided" so that it can be easily read by persons entering the premises.	1	Whilst the law states over 18, the club will operate an over 21 policy to deter large groups of young men. Over 18's will be admitted at the managements discretion.	1	Admissions Policy
25	Each area where relevant entertainment is conducted shall be supervised and/or contain a panic alarm for the safety of performers.	1	Panic alarms and CCTV are installed in these areas.	1	Deployment Policy & Performer Welfare Policy
26	A customer code of conduct shall be prominently displayed in each area to which the public are admitted.	1	The customers code of conduct will be displayed in entrance/reception area, toilets, private performance areas and bar areas. They will also be sited in the public areas.	1	Customer Conduct Policy
27	Performers shall be aged not less than 18 years.	1	The management have decided performers must be 19 years or older.	1	Performers Policy
28	Full nudity is only permitted in the approved designated areas, as stipulated or shown on the approved plan attached to the licence. In all other public areas within the premises the performers and employees must at all times wear at least a G string (female) and or pouch (male) covering the genitalia	1	This will be supervised by the DPS / manager, bar staff and security team. All performers will be aware of this rule in their induction and signed copy of the Performers Policy. Previous experience also shows that other performers will also bring this to management attention at once.	1	Performers Policy / Staff Deployment Policy / Induction Policy

29	During all performances (including performances usually termed 'private dances') there must not be any deliberate contact, by the performer, with any patron or person within the audience except: • a). Leading a patron by the hand to and from a chair or private room or designated dance area. • b). Simple handshake greeting at the beginning and/or end of the performance. • c). A customary ("peck on the cheek") kiss at the end of the performance. • d). the placing of monetary notes or dance vouchers into the hand or garter worn by the performer	1	This condition to be rigorously enforced. The venue will be adequately lit allowing good quality CCTV with infra-red cameras. All performers will receive training on the rules during induction. Security team, manager, DJ and bar staff will be vigilant to bring issues to the attention of the DPS.	1	Performers Policy / Induction Policy / Staff Deployment Policy / CCTV Policy / Customer Conduct Policy / Performers Welfare Policy / Disciplinary Policy
30	No performances shall include any sex act involving any persons or objects. (or involve any form of auto-erotic stimulation).	1	All performers to have the rules explained and the venue to be monitored by manager, DPS, all staff and CCTV.	1	Induction Policy / Performers Policy / Discipline Policy
31	A price list shall be displayed in a prominent position giving the price and the duration of any 'private dances'.	1	Prices and duration of dances will be displayed at the bar and on tables in the premises along with the no touching rule.	1	SEV Conditions
32	Any person employed to supervise or attend to the exterior or entrance area of the premises must, at all times be suitably and sensibly dressed so as not to indicate or suggest the nature of the relevant entertainment taking place at the premises.	1	Front of house staff and security to be dressed smartly in a business like manner. Consideration is currently being given to bodycam being worn by one of the front of house security team.	1	CCTV Policy
33	No fastening or lock of any description shall be fitted upon any booth or cubicle or other area within the premises except as shown on the plan; within the toilets, within the performers' dressing rooms and/or staff areas.	1	There were previously doors with locks fitted from the previous management. All locks are to be removed.	1	SEV Conditions
34	At all times during a performance, performers shall have unrestricted access to a dressing room.	1	The performers have access to a private dressing room at all times. This is away from customers and there is no access for customers. The entrance is covered by CCTV.	1	CCTV Policy / Performers Policy
35	Patrons or members of the audience shall not take photographs or record digital images of performers within the premises via a camera or mobile phones	1	Signs will be displayed throughout the premises and at the reception desk with the customer code of conduct explaining this rule. The DJ will make announcements periodically explaining this rule. Customers breaking the rule will be asked to delete the images from the device and the rule will be explained. A repeat offence will result in the offender being asked to leave the premises.	1	Customer Conduct Policy / Staff Deployment Policy

36	The licensee shall ensure all door supervisors employed or contracted to work on the premises are suitably licensed by The Security Industry Authority or appropriate agency. Where door staff are used, the licensee shall maintain profiles for all door staff that are, or have been, working at the premises in the last six months. The profile is to contain proof of identity (copy of passport /photo driving licence) and proof of address dated within the last six months (bank statement /utility bill). Separate proof of address is not necessary when the proof of identity is a photo driving licence. All profiles are to be made immediately available to Authorised Officers upon request.	1	Only SIA licensed doorman will be allowed to work as security. An individual staff file for each security supervisor will be kept with copies of the SIA license.	1	N/A
37		1	Individual staff files will be kept and available for inspection.	1	Induction Policy /Employee records
38	An adequate number of licensed door supervisors, based on a risk assessment undertaken by the licensee, shall be on duty on the premises whilst relevant entertainment takes place.	1	A risk assessment and security team deployment plan will be submitted based.	1	Staff Deployment Policy
39	At least one door supervisor shall be on duty at the premises at all times when the relevant entertainment takes place.	1		1	Staff Deployment Policy
40	CCTV shall be installed in each room within the premises where the public has access save for the toilet and staff only areas. All cameras shall continuously record whilst the premises are open to the public and recordings shall be kept available for a minimum of twenty-eight days	1	CCTV is installed throughout the premises and has previously been approved by the Police. The Police will be invited to inspect the CCTV system and cameras and make any suggestions for improvement. In addition the CCTV system will be enhanced to include remote monitoring via a portable device in the possession of the DPS / responsible person. A remote station will also be available at reception desk for viewing by authorised officers and will not be visible to the public.	1	CCTV Policy
41	A member of staff who is fully trained in the use of the CCTV system shall be on duty at all times when the premises are open until the premises are clear of customers.	1	DPS and deputy manager, together with CCTV operator will be fully trained on the system. See proposed condition	1	CCTV Policy
42	The premises will provide copies of any recordings upon request by a police officer or an authorised officer of the Council within 24 hours of the request.	1	See above	1	CCTV Policy
43	The licensee shall not allow the use of vehicles including limousines for the promotion of the relevant entertainment	1	No such vehicles are proposed	1	N/A

44	The collection of patrons and or potential clients is not permitted unless the vehicle is licensed in accordance with the provisions of the Local Government (Miscellaneous Provisions) Act 1976.	1	No such collections are proposed	1	
45	The licensee shall not permit any person whilst on a public thoroughfare to encourage any other person to visit the SEV premises by any means.	1	Noted. Additional conditions are being proposed to support this	1	
46	The licensee shall endeavour to ensure any marketing communications associated with the SEV or relevant entertainment shall comply with the code of practice as issued by the Advertising Standards Authority.	1	All marketing material will comply and be checked against ASA code of practice	1	
47	Officers of the Council, Police, and other authorised agencies who are furnished with authorities (which will be produced on request) shall be admitted immediately to all parts of the premises at all reasonable times and at any time the premises are open for business.	1	Accepted	1	

TRANSACTION ACKNOWLEDEMENT

DATE:

TIME:

CUSTOMER NAME:

NAME ON CARD:

LAST 4 DIGITS OF CARD:

TRANSACTION AMOUNT:

I AM FULLY AWARE AND AUTHORISE THE TRANSACTION TAKING PLACE IN PARADISE CITY, 193 – 194 BROAD STREET, BIRMINGHAM, B15 1AY.

I ACKNOWLEDGE THAT FRAUDULANT TRANSACTIONS MAY BE SUBJECT TO CRIMINAL AND OR CIVIL ACTION.

CUSTOMER SIGNATURE:

NAME OF STAFF MEMBER PROCESSING PAYMENT:

STAFF SIGNATURE:



PARADISE CITY. 193 – 194 BROAD STREET, BIRMINGHAM, B15 1AY.

STAFF TRAINING

As a way of checking your knowledge, please answer the questions below.

LICENSING.

1: What are the permitted opening hours?

2: What are the 4 licensing objectives?

1:

2:

3:

4:

3: What does challenge 25 mean?

4: What are acceptable forms of ID for checking someone's age?

5: What ABV content should a 'low alcohol' product contain?

HEALTH AND SAFETY

1: Name your three main responsibilities regarding health and safety as an employee?

A:

B:

C:

2: Describe the correct way to lift?

3: Where is the location of the accident book/log?

4: Who are the current first aiders?

5: How should you dispose of broken glass?

6: Name three basic controls you should carry out when using chemicals?

A:

B:

C:

FIRE SAFETY

1: Record where the following are located.

A: Nearest fire exit.

B: Assembly point.

C: Nearest break glass.

D: Nearest fire extinguisher.

2: What type of fire extinguishers does the club have?

3: Name 3 measures you can take to prevent fire.

A:

B:

C:

DISABILITY AWARENESS

A disability is defined as a physical or mental impairment which has substantial and long term effect on carrying out normal day to day activities.

1: List three disabilities you may come across whilst at work.

A:

B:

C:

2: Describe in your own words what you think discrimination means under the disability act.

3: What features at this site do you think might restrict a disabled person?

TAB 4:

CURRICULUM VITAE

TAB	DOCUMENT
4.1	Gary Brown
4.2	Andy Bamber
4.3	Ruxandra Niculescu
4.4	Zviad Tsiklauri

Gary Brown – Curriculum Vitae

Address:
Telephone:
Email:
D.O.B :



Personal Profile

- Well-presented, understanding and approachable. Able to interact with customers and colleagues in a friendly and professional manner.
- Enjoys problem solving, team leading, staff management and training. A good listener and always happy to help others.
- I am articulate and take pride in whatever I do. A quick learner, I can work individually or within a team to understand and achieve targets and motivate myself and others whilst understanding and adhering to regulation and compliance.

Employment

Valuations Manager

Connells Group (Shipways-Sequence)

March 2014 - Present

- Invited to join the group by the Regional Director based on previous success with competitor businesses.
- Valuing and listing properties for sale whilst being compliant with The Estate Agency Act, Consumer Protection Regulations, Data Protection, Money Laundering / Financial Crime. I would undergo continuous training throughout this role and be expected to pass an annual accreditation on all the above and be subject to regular audits. I passed every audit and accreditation exam I sat while in the role.
- I am often called upon by the Regional Director and colleagues to provide advice to other staff members on general compliance issues and money laundering. It is an area of the business that I enjoy and understand well.
- Leading a team of sales staff focussed on the valuation aspect of the business and ensuring compliance with legal and industry regulations alongside the branch manager.
- Training colleagues and helping them to perform their roles confidently, compliantly and with success.

DJ / Entertainment

Legs 11 – China Town

2013 - November 2017

- Providing music entertainment and managing the dancers for stage shows.
- Being aware of the club rules for both staff and public with regards to the provision of lap dancing entertainment and assisting management in making sure the club rules are adhered to by dancers and the public. Bringing to the attention of the management and or door supervisors any contravention of the club rules or any issues / disturbances that could put members of the public or staff at risk or in danger.

Valuations Manager
Your-Move

April 2013 – March 2014

- Invited to join the company by regional director having been aware of results in previous employment.
- Working for the UK's largest Estate Agency brand. Responsible for providing best in class customer service and being the agent of choice.
- Training colleagues in branch around customer service skills, sales skills, product knowledge and compliance including the Estate Agency Act, Money Laundering / Financial Crime and Consumer Protection Regulations.
- Working within a team to exceed targets and our customers' expectations.

Property Appraisal Manager
Dixons Countrywide

April 2011 – March 2013

- Offered the role with no previous experience in the property industry and went on to become top of the regional league tables for performance.
- I took part in regular training sessions with colleagues, often leading and offering a different perspective as an outsider coming into a new industry.
- Listing saleable properties in accordance with the company's fee scale and adhering to relevant legislation and compliance.

Sales Coach
Pc World, Sutton Coldfield, Birmingham

July 2008 – March 2011

- Shop floor management of the sales team, understanding the business objectives, goals & targets. Part of a team responsible for achieving and sustaining numerous KPI's and ensuring an excellent level of customer service.
- Ensuring company rules & procedures are adhered to and understanding Health & Safety in the workplace and enforcing and acting on issues when they arise.
- Dealing with the return of goods and customer service issues in accordance with Consumer Protection Regulations and The Sale of Goods Act.
- Performing weekly/monthly performance reviews of staff including team development and performance management.
- Ensuring all staff possess a first class level of product knowledge.
- Key holder, responsible for ensuring security of stock & premises.
- 1st line support for I.T problems for customers and colleagues.

Customer Advisor (Connections Champion)

PC World, Sutton Coldfield, Birmingham.

- Responsible for training colleagues on the connectivity propositions. (Home & mobile broadband, digital TV services & mobile phones)
- Driving sales and achieving both personal sales targets & store targets.

Business Account Developer

PC World, Sutton Coldfield, Birmingham.

- Advising commercial, domestic and educational businesses on software & hardware solutions.
- Managing top 500 accounts.
- Training and coaching colleagues on all aspects of the business from administration to process and procedure and behaviours.
- 1st line support for business customers IT issues.

DJ / Marketing / Promotions

Self Employed.

February 1994 – December 2017

- Working all over the UK and Europe with various companies performing as a nightclub DJ as well as involvement in venue marketing and promotional activity. Identifying target clientele and implementing promotional events.
- I formed a good working relationship with two General Managers whilst working for Luminar Leisure who in turn took me to new venues they were posted to work alongside them.
- Being alert and aware of staff and public safety in an environment where alcohol was served.
- Creating customer profiles and databases to target relevant attendance to events.
- Gained experience dealing with the general public of all ages and from all walks of life.
- I enjoyed getting involved with local radio stations and producing shows and advertising.
- Running & owning my own business taught me valuable skills and the importance of always striving to be the best in your chosen field.

Functions / Conference Manager

Number 10 Bowling Centre, Norwich, Norfolk.

January 2001 – December 2002

- Part of the management team in a large 30 lane bowling centre including nightclub, function / conference room, bars, restaurant and arcade. Overseeing staff to ensure deadlines for preparation of events were met.
- Being on site during entertainment bookings and nightclub opening times to run the business, ensure licensing and entertainment laws were adhered to and enforced.
- Identifying staff training needs and developing staff to excel in their roles within the company.
- Creating new relationships with local and national business. Creating business for the private hire and conference side of the business.
- Being present during functions and conferences ensuring a high level of customer service and public safety.

Sales Advisor

July 1999 - December 2001

Bennett's Retail, Robert Boby Way, Bury St Edmunds, Suffolk.

- Trained as a multi-skilled sales advisor of electrical goods. (Brown & White goods)
- Attended numerous manufacturers training courses such as Sky, JVC, and Sony. Passing on training knowledge to other staff members.
- Chosen to be trained as the stores only mobile phone specialist advising and selling o2, Vodafone, T mobile and Orange.
- Advising customers on goods, services and extended service plans and advising on and completing credit applications.

Education & qualifications

February 2018	Award for personal license holders (BIIAB Level 2)
January 2018	Connells Group annual accreditation. Financial Crime, Data Protection, Consumer Protection Regulations, Estate Agency Act and general compliance.
March 2011	NVQ Level 2 In Team Leading Modules: Allocating and checking work, health and safety at work, managing resources, providing team leadership, providing learning opportunity for colleagues.
September 2010	EDI Level 2 Certificate In Team Leading
May 2010	Microsoft Office 2010 specialist learning course.
Feb 2010	Microsoft Windows training course.
1993 - 1994	City College, Norwich - 1yr training on a civil engineering work placement.
April 1993	I hold a full UK driving license with no penalty points.
1992 - 1993	After leaving school I attended Great Yarmouth College of Further Education - BTEC National Diploma in Leisure and Recreation, although I didn't complete the last three months of this course.
1988 - 1992	Lynn Grove High School Great Yarmouth - GCSEs Math (C) Design & Technology (B) English Language (C), English Literature (D), Double Certificate Sciences (CC), French (D), Physical Education (D), Religious & Social Education (B)
1996	I previously sat the BIIA Level 2 course around 1996 and passed. I was managing a small nightclub in Great Yarmouth called Liberty's Rock Café and attended Great Yarmouth Magistrates Court where I was granted a license to sell alcohol for consumption on and off the premises. Duties included opening and closing procedures, cashing up, programming of epos till systems, stock management, staff training and management and overseeing door supervisors and admissions policy. The club traded seven nights a week with a Public Entertainment License for music, dancing and singing.
1992	Awarded 1 st Dan Black Belt by the English Korean Karate Association.

Personal summary: Andrew Bamber

I retired from the Metropolitan Police in January 2007 having served 34 years of exemplary service. Throughout my service I have been regularly involved in the enforcement, management, and development of licensing initiatives and policies. I retired as a Borough Commander.

As a constable I worked as an undercover officer detecting offences in late night licensed premises in central and west London. As an Inspector I was the licensing Inspector for a very busy inner London policing division.

Whilst working as a Chief Inspector I was the operations manager in the central London Clubs and Vice unit from 1990-1996. As a part of this role I had responsibility for late night licensing in Westminster and I supported other London boroughs as appropriate. During this period, I managed both covert and overt police operations on behalf of the police and the local authority to ensure compliance with the legislation and to prosecute breaches where necessary. The overt licensing visits were structured in a way that ensured that all premises operating with late night licences received at least 4 visits a year from a joint licensing team of police officers and local authority officers.

It was during this period that I was involved in the development of the initial licensed door supervisors scheme, commissioned by Westminster City Council, which was implemented and managed by myself within the Clubs and Vice unit. During the same period I researched, with a local authority counterpart, the potential for the introduction of 'Lap Dancing' clubs in Westminster. The work resulted in the introduction of 'lap dancing' establishments in the borough. The initiative and the supervision of the licence was then monitored covertly and overtly by officers under my direction.

As a Borough Commander on 2 London boroughs, between 2001 and the beginning of 2007 (January), I worked with both local authorities to develop the respective licensing and enforcement policies. The work with the Local Authority formed a significant part of Community Safety and local policing plans.

With the introduction of the new licensing legislation in 2003 I oversaw the transfer of responsibilities to the local authority and was instrumental in setting up a joint licensing team for a busy inner London borough.

In 2007 having retired from the police and was employed by an inner London local authority as an assistant director. I had responsibility for a wide ranging Safer Communities portfolio that included the licensing function and treatment regimes for drugs and alcohol. During the 10 years spent with the authority I worked closely with the local policing teams to ensure that licensed premises were effectively supervised and managed in line with local initiatives and the borough licensing and enforcement policies.

As the principal officer for licensing in the local authority I worked closely with local community groups, ward councillors, and members of the licensing committee to develop knowledge and understanding of local enforcement policies and crime and disorder initiatives linked to drugs and alcohol and the supervision of licensed premises and the licensing objectives. I was responsible for delivering a structured approach to licensing management and supervision, the councils community safety plan, the enforcement policy, and licensing policy. My role also included the consultation, development, and delivery of the boroughs controlled drinking zone, cumulative impact zone, Sexual Entertainment Venues, late night levy, early morning restriction orders, Best Bar None, and alcohol treatment programmes.

On my retirement from Local Government I set up my own compliance consultancy and offer independent advice and compliance audits for licensed premises. I have given evidence at licensing hearings/reviews, and appeals on behalf of the Metropolitan Police, Local Authorities and individual premises in each of my respective roles.

I have a Masters Degree in Business Administration.

Ruxandra Niculescu



Personal Profile

I am a dynamic, professional, trustworthy and honest individual with a wide range of expertise in various fields.

I always aim to learn new things and have a very competitive spirit.

I have good communication, leadership and analytical skills.

I am a dedicated team player who leads by example, inspiring others towards shared goals, driven by a personal passion for excellence and professional loyalty.

Key Skills and Abilities

- IT astute: All MS Packages, Excel, Mail Merge.
- Thrives under pressure.
- Highly target focussed – Exceeding targets every time.
- Adaptable and able to learn new skills quickly.
- Able to research and find information as required to further the goals of the business.
- Good verbal, written, face to face communication skills.
- Good awareness of health and safety in the work place.
- Translation skills.
- First Aid trained and certified.
- Fire Marshal trained and certified.
- SIA trained and certified.
- Restaurant Hospitality and Management Diploma.
- Also holding a valid drinks Licence.

Employment History

September 2017- Present

Branch Administrator Shipways

Typing letters for Residential Sales/Lettings from our in-house estate agency software

Weekly send-outs of via email from our software

Telephone cover

Creating property details.

Obtaining vendors' approval

Getting sale details ready to go online.

-Performing mail-merges

- Vendor reports via Rightmove.co.uk

-Branch Profile maintenance.

-Staff profile updates

- Franking all post

- Ordering stationery etc/office supplies and maintaining/recording stock

- Ordering business cards

- Chasing for Compliance

June 2015- August 2017

General manager at DanSId Limited an entertainment club in the heart of Birmingham.

My role as a General Manager was to ensure that everyone is trained to the best of their ability and able to perform their duties without any difficulty.

My responsibilities included:

Creating rotas for the staff (duty managers, bar staff, promoters, door staff, DJs and entertainers).

Calculating staff wages and artist earnings for every shift they work.

Recruiting/Interviewing bar staff, door staff, DJ, promoters and new artists.

Responsible to do new starters' inductions and follow up every quarter with all members of our team to serve as a refresher and ensure everyone remembers and adheres to the terms and

conditions of our licence, health and safety policy, sexual harassment policy, fire risk assessment and fire drills procedures.

At the end of the induction I would provide them with a company/staff handbook, giving guidance and explaining rules and procedures to staff working on the premises, which I was entrusted to write by the company.

Also keeping a good record of all training records and questionnaires to be always available for inspection by the local authorities.

I was in charge with opening and closing the premises, checking the float and the tills making sure everything was compliant and ready for business.

I was also responsible for the tills and end of session cashing up.

Able to do Z-totals and X-totals for the tills and PDQ machines, add and remove products on the tills also change products prices.

Add and remove clerks' names on the tills.

Weekly summaries and wage lists were also my responsibility.

Handling customer complaints both in person, phone and via emails.

Stock count and stock orders.

Handling all the product payments to suppliers.

Making sure our liability insurance and all required licences are renewed in time.

Trained in working CCTV and making sure the police and traffic wardens are always provided with the video footage they require.

Always ensuring that our premises and staff was compliant with current laws and regulations.

June 2013 – June 2015

Duty Manager at DanSid Limited an entertainment club in the heart of Birmingham.

My role as a Duty Manager was to make sure everything is run smoothly and without disruption in the absence of the General Manager.

My responsibilities included:

I was in charge with opening and closing the premises, checking the float and the tills making sure everything is compliant and ready for business.

I was also responsible for the tills and end of session cashing up.

Able to do Z-totals and X-totals for the tills and PDQ machines, add and remove products on the tills also change products prices.

Add and remove clerks' names on the tills.

I was also responsible for the tills and end of session cashing up.

Stock count.

Handling customer complaints both in person, phone and via emails.

Supervising employees and artists to ensure all the rules and regulations under which our premise was operating were being followed.

April 2013- March 2010

Bar Staff and Waitress at Poppy Red in the Arcadian.

January 2009- April 2005

Working on the checkout till in a supermarket in Bucharest Romania.

January 2005- July 2001

Bar Staff and waitress at Bavaria Pub and Club in Bucharest Romania

Education and Training

- First Aid trained and certified.
- Fire Marshal trained and certified.
- SIA trained and certified.
- Restaurant Hospitality and Management Diploma (Online Course).
- Duty/DPS Manager Diploma.

Equivalent of A levels studies in Romania.

1997 – 2001 High school Ion-Luca-Caragiale-Bucuresti-sector-1

Also attended Dudley College in 2009 to perfect my English and IT skills.

Interests and Hobbies

- Travel
- Listening to music.
- Getting together with friends/socialising/dinning out.
- Decorating.

References available on request.

ZVIAD TSIKLARI

PROFILE SUMMARY

I am a qualified close protection operative and senior door supervisor with a wealth of experience and knowledge of security management and operations. Having worked in many different sectors from construction sites, offices, casinos, nightclubs, gentleman's clubs, to high profile celebrity close protection, possess me with extensive knowledge of relevant safety equipment, policies, procedures and strategies to deal with emergency situations. With a good friendly outlook, this enables me to relate to the public well and build up an excellent rapport instantly. I am proactive in recognising and defusing tensions in hostile or violent situations and taking relevant action before they escalate into criminal matters. I am confident, highly motivated and as a professional, I am well presented and take pride in my work. I have experience in leading teams; I also work well on my own and enjoy being part of a good team who are able to work well together.

CAREER HISTORY

HEAD DOOR SUPERVISOR LEGS11 GENTLEMAN'S CLUB FEBRUARY 2014 – AUGUST 2017

Key Responsibilities:

- Lead a team of four door supervisors
- Hold briefing meetings with door staff
- Conduct discipline meetings with door staff
- Conduct welfare meetings with door staff
- Meet and greet high profile VIP clients
- Conduct searches for weapons
- Conduct searches when drug use confirmed
- Monitor clients for drunkenness/drugs
- Keep observations of all staff within individual rooms via CCTV to detect offences
- Enforce the high standard of regulations of the venue at all times
- Conduct patrols within venue
- Provide assistance to door supervisors in case of emergencies
- Provide close protection security of dancers on stage when necessary
- Crowd control of the stage area/outside of venue
- Keep constant radio contact with staff
- Liaise with police when apprehension of offenders
- Provide evidential statements/CCTV to police when necessary

HEAD DOOR SUPERVISOR SECURE-IT JULY 2013 – JANUARY 2014

Key Responsibilities:

- Meet and greet clients attending the Casino
- Check identification for authentication and confirmation of clients age
- Check if clients are impaired through drink or drugs
- Search clients for weapons and drugs
- Crowd control inside and outside of venue
- Enforce evenly and fairly regulations of venue if necessary
- Eject clients who are aggressive or committing offences and liaise with the Police
- Conduct patrols within venue to ensure all fire exits are kept clear in case of emergency
- Keep observations within venue to ensure safety of all staff and clients and prevent offences

occurring

- Provide emergency First Aid whenever required
- Check CCTV is in working order and provide to the Police as necessary

HEAD DOOR SUPERVISOR

AMARA VIP

DECEMBER 2011 – JULY 2013

Key Responsibilities:

- Lead a team of six door supervisors
- Held briefing meetings with door staff to update on clients attending venue everyday
- Discipline door staff where code of conduct had been breached
- Meet and greet high profile VIP clients attending the gentleman's club
- Keep observations of all staff within individual rooms via CCTV to detect offences
- Enforce the high standard of regulations of the venue at all times
- Conduct patrols within venue to provide assistance to door supervisors in case of emergencies
- Provide close protection security of dancers on stage
- Crowd control of the stage area
- Keep constant radio contact with door staff as well as director of venue as requested

CLOSE PROTECTION

AMARA VIP

DECEMBER 2011 – JULY 2013

Key Responsibilities:

- Provide constant security service to very high profile football player
- Attend meetings with client nationally and internationally
- Attend private functions with client
- Carry out tasks requested by client
- Provide protection for clients family
- Close protection security provided to very high profile musical artist NEYO
- Close protection security provided for Tinchy Stryder
- Close protection security provided for Alexandra Burke
- Close protection security provided for Chipmunk
- All protection provided on individual basis as requested by client
- Crowd control to ensure artist was not bombarded by fans
- Escorting artist onto the stage
- Stage control to allow artist to perform without disruptions
- Escorting artist of stage
- Escorting artist to personal vehicle and attending other venues nationally

DOOR SUPERVISOR

SECURE SERVICES

JANUARY 2009 – DECEMBER 2011

Key Responsibilities:

- Meet and greet clients attending nightclub
- Check identification for authentication and confirmation of clients age
- Search clients for illegal substances, weapons and alcohol
- Conduct patrols of whole venue to ensure fire exits are kept clear
- Keep observations of clients within premises to prevent offences
- Liaise with Police officers in order for them to conduct "walk throughs"
- Escort clients out of premises who have committed offences and liaise with Police
- Assist in removing clients from premises after venue closing

DOOR SUPERVISOR**PLATINUM SECURITY****MAY 2005 – DECEMBER 2009****Key Responsibilities:**

- Meet and greet clients attending nightclub
- Ensure clients identification is authentic and client is of correct age to enter
- Search clients to ensure drugs, alcohol and weapons are not taken into venue
- Keep observations inside and outside venue in order to detect potential offences
- Assist other team members in removing clients from venue

SECURITY GUARD**PLATINUM SECURITY****MAY 2005 – DECEMBER 2009****Key Responsibilities:**

- Have a briefing meeting with previous security guard
- Report to base on hourly intervals
- Provide high visibility patrols of whole construction site
- Provide written accounts of any issues or break-ins and report to management
- Have a briefing meeting with staff working on site the following day

PROFESSIONAL SKILLS

- Close Protection Operative
- Advanced Driver
- Firearms Trained
- Covert/Overt Surveillance Trained
- Fully SIA Front Line Trained
- First Aid Trained
- British Judo Master (3rd Dan)
- Self Defence Instructor
- Team Leader
- Customer Services
- Excellent Observational Skills
- Analysing Situations
- Crowd Monitoring/Control
- Door Supervision
- Close Protection
- Conflict Resolutions
- Fire Safety Trained
- Drugs Awareness Trained

PERSONAL SKILLS

- Honest
- Punctual
- Reliable
- Efficient
- Confident
- Excellent Judgement
- Assertive
- Energetic
- Perceptive
- Flexible
- Multi Lingual

QUALIFICATIONS

- SIA Door Supervisors Training Course
- Close Protection Course
- International Degree

OTHER ACHIEVEMENTS

- British No1 Heavyweight Judo Champion
- Commonwealth Judo Masters Champion
- International Judo Gold Medalist

INTERESTS

- Judo – competing for England
- Voluntary judo instructor
- Gardening
- Going to the gym
- Socialising
- Cooking

REFERENCES AVAILABLE UPON REQUEST

TAB 5

PERSONAL DOCUMENTS OF GARY BROWN

TAB	DOCUMENT
5.1	DBS certificate
5.2	Personal Licence
5.3	Personal Licence Card
5.4	BII Level 2 certificate

BASIC Certificate



Disclosure &
Barring Service

DBS fee charged

Certificate number: 000893377530

DBS ID number: P0000A02MN5

Date of issue: 26 FEBRUARY 2018

Applicant personal details

Surname: BROWN

Forename(s): GARY RAYMOND

Other names: NONE DECLARED

Date of birth: [REDACTED]

Place of birth: [REDACTED]

Gender: MALE

Police Records of Convictions, Cautions, Reprimands and Warnings

NONE RECORDED

BASIC Certificate

This document is a basic certificate within the meaning of section 112 of the Police Act 1997.

BIRMINGHAM CITY COUNCIL



LICENSING ACT 2003

PERSONAL LICENCE

Licensee Name
Mr Gary Raymond Brown

Licence Number : 10735

Licensee Address

Issue Number : 1
Issue Date : 16/03/2018

BIRMINGHAM

Relevant Offences

Country	Conviction Date	Offence	Sentence

The photocard and paper counterpart together make up the complete personal licence and should be kept together. Both must be produced when required.

Granted By:

A handwritten signature in black ink, appearing to read 'Bhupinder'.

Bhupinder Nandhra
Senior Licensing Officer

Please Note: This document should NOT be relied upon as a form of identification. The requirement to renew Personal Licences was abolished as of the 1st April 2015. The Licensing Authority has therefore not been able to conduct a Criminal Records Check upon the licence holder, to ascertain whether they have been subsequently convicted of any relevant or foreign offences since the licence was first granted.

Birmingham City Council

Licensing Act 2003

Licence N° **10735 / 1**



Surname

Brown

Forenames

Gary Raymond

Address

[REDACTED]
[REDACTED]
[REDACTED]

PERSONAL LICENCE

This is to certify that

GARY BROWN

has been awarded the

**BIIAB Level 2 Award for Personal Licence
Holders**

Qualification Accreditation Number: 003/2488/6
Certificate Number: 188582

Date Achieved: 12/02/2018
Learner Number: 190438



Denise Thomson
Responsible Officer

TAB 6

PERSONAL DOCUMENTS OF DANIEL PARMA

TAB	DOCUMENT
6.1	Birth Certificate
6.2	Personal Licence & SIA Card
6.3	DBS Certificate




008063372

REPUBLIKA E SHQIPËRISE
Republic of Albania
République d'Albanie
Republica de Albania
Republik Albanien
Repubblica d'Albania
Δημοκρατία της Αλβανίας

Zyra e Gjendjes Civile Balkdre i ri
Civil Registry Office
Office de l'Etat Civil
Servicio del Registro Civil
Standesamtsbehörde
Ufficio dello Stato Civile
Ληξιαρχείο

CERTIFIKATE LINDJE

Birth Certificate - Certificat de Naissance - Certificado de Nacimiento - Geburtsurkunde
Certificato di Nascita - Πιστοποιητικό Γέννησης

Emri - Name - Prénom - Nombre - Vorname - Nome - Όνομα	Elton
Mbiemri - Surname - Nom - Apellido - Familienname - Cognome - Επώνυμο	LEKSTAKAJ
Numri personal - Personal number - Numéro personnel - Número personal - Personal nummer - Numero personale - Προσωπικός αριθμός	[REDACTED]
Emri i babait - Father's name - Prénom du père - Nombre del padre - Vorname des Vaters - Nome del padre - Όνομα Πατρός	Pjeter
Emri i nënës - Mother's name - Prénom de la mère - Nombre de la madre - Vorname der Mutter - Nome della madre - Όνομα μητρός	Marije
Data lindja - Date of birth - Date de naissance - Fecha de nacimiento - Geburtsdatum - Data di nascita - Ημερομηνία γεννήσεως	[REDACTED]
Vendi lindja - Place of birth - Lieu de naissance - Lugar de nacimiento - Geburtsort - Luogo di nascita - Τόπος γεννήσεως	[REDACTED]
Vendbanimi - Place of residence - Lieu de domicile - Domicilio - Wohnort - Luogo di domicilio - Τόπος κατοικίας	[REDACTED]
Gjinia - Sex - Sexe - Sesso - Geschlecht - Sesso - Φύλο	M
Gjendja civile - Civil status - Etat civil - Estado civil - Familienstand - Stato civile - Οικογενειακή κατάσταση	
Beqar/e - Single - Célibataire - Soltero/a - Ledig - Celibe - Άγαμος/η	X
i/e Martuar - Married - Marié/e - Casado/a - Verheiratet - Coniugato/a - Έγγαμος/η	[]
i/e Shkurorëzuar - Divorced - Divorcé/e - Divorciado/a - Geschieden - Divorziato/a - Διαζευγμένος/η	[]
i/e Ve - Widower/Widow - Veuf/veuve - Viudo/a - Verwitwet - Vedovo/a - Χήρος/α	[]
Shtetësia - Citizenship - Citoyenneté - Ciudadanía - Staatsangehörigkeit - Cittadinanza - Ιθαγένεια	ALB
Mbiemri para martesë - Surname before marriage - Nom avant le mariage - Apellido antes del matrimonio - Geburtsname - Cognome prima del matrimonio - Επώνυμο πριν/ μετά το γάμο	-----
Data e lëshimit - Date of issue - Date de délivrance - Fecha de expedición - Ausstellungsdatum - Data del rilascio - Ημερομηνία χορήγησης	27-10-2015
Emri, Mbiemri, Nënshkrimi i Nëpunësit të Gjendjes Civile, Vula Name, Surname, Signature and Seal of Keeper Prénom, Nom, Signature, Sceau de l'Officier de l'Etat Civil Nombre, Apellido, Firma y Sello del Oficial de Registro Civil Vorname, Familienname, Unterschrift und Dienstsiegel des Standesbeamten Nome, Cognome, Firma e Timbro del Pubblico Ufficiale dallo Stato Civile Όνομα, Επώνυμο, Υπογραφή και Σφραγίδα του Υπαλλήλου του Ληξιαρχείου	<p>PRENË PËRPALË</p> 



 **Birmingham City Council**

Licensing Act 2003



Licence N **8348 / 1**

Expires **22/06/2024**

Surname **Parma**

Forenames **Daniel**

Address **[REDACTED]**

PERSONAL LICENCE

1018 5163 4881 5288

LICENCE

Security Industry Authority

EXPIRES
14 JAN 2021



DOOR SUPERVISOR

STRICTLY PRIVATE AND CONFIDENTIAL

DANIEL PARMA

Standard Certificate

Page 1 of 2

Certificate Number: MD080118-03

DBS Fee charged

Date of Issue: 18 DECEMBER 2017

Applicant Personal Details

Employment Details

Surname: PARMA

Position Applied For:
1313220443564

Forenames: DANIEL

Name of Employer:
SECURITY INDUSTRY AUTHORITY

Other Names:
DANIEL LEKSTAKA
ELTON PARMA
ELTON LEKSTAKA

Date of Birth:

Countersignatory Details

Place of Birth: DIAKOVA, OBSOLETE SEES
TERRITORY

Registered Person/Body:
THE SIA

Gender: MALE

Countersignatory:
BENJAMIN HARRISON

THIS CERTIFICATE IS NOT EVIDENCE OF IDENTITY

Disclosure and Barring Service, PO Box 165, Liverpool, L69 3JD. Helpline 03000 200 190

Page 1 of 2

Police Records of Convictions, Cautions, Reprimands and Final Warnings

1

Standard Certificate

This document is a Criminal Record Certificate within the meaning of sections 113A and 114 of the Police Act 1997

THIS CERTIFICATE IS NOT EVIDENCE OF IDENTITY

Disclosure and Barring Service, PO Box 165, Liverpool L69 3JD Helpline 03000 200 190

Page 2 of 2

TAB 7

PERSONAL DOCUMENTS OF RUXANDRA NICULESCU & ZVIAD TSIKLAURI

TAB	DOCUMENT
7.1	Personal Licence- Ruxandra Niculescu
7.2	Professional Certificates: Ruxandra Niculescu: Level 3 Certificate in Mortgage Advice & Practice; Restaurant & Hospitality & Management Diploma; SIA licence
7.3	SIA licence: Zviad Tsiklauri

 **Birmingham City Council**
Licensing Act 2003

Licence N° 7950 / 3



Surname **Niculescu**

Forenames **Ruxandra**

Address



PERSONAL LICENCE

BIRMINGHAM CITY COUNCIL



LICENSING ACT 2003

PERSONAL LICENCE

Licensee Name
Miss Ruxandra Niculescu

Licence Number : 7950

Licensee Address
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Issue Number : 3
Issue Date : 03/10/2013

Relevant Offences

Country	Conviction Date	Offence	Sentence

The photocard and paper counterpart together make up the complete personal licence and should be kept together. Both must be produced when required.

Granted By:

Handwritten signature of Carolyn Bennett in black ink.

Carolyn Bennett
Senior Licensing Officer

Please Note: This document should **NOT** be relied upon as a form of identification. The requirement to renew Personal Licences was abolished as of the 1st April 2015. The Licensing Authority has therefore not been able to conduct a Criminal Records Check upon the licence holder, to ascertain whether they have been subsequently convicted of any relevant or foreign offences since the licence was first granted.

This is to certify that

Ruxandra-Cristina Niculescu

has been awarded the following qualification

**LIBF Level 3 Certificate in Mortgage Advice
and Practice - 501/0629/6**



PROF STEVEN HABERMAN

Chairman



ALEX FRASER

Chief Executive



27 June 2018

A338466

Regulated by

Ofqual

For full details of the regulatory framework, visit www.ofqual.gov.uk



Restaurant Management Diploma

Certificate No
XGEVG9UD

This certificate is to verify that

Ruxandra
Niculescu

Has successfully completed the

RESTAURANT MANAGEMENT DIPLOMA COURSE

20th June 2016

Date



D. Morgan

D. Morgan

Head Tutor

Restaurant Management

Academy

This certificate can be verified online at: <http://www.restaurantmanagementdiploma.co.uk>



0130 1122 7151 5628



Security Industry Authority
LICENCE

EXPIRES

10 APR 2019

Z. TSIKLARI



DOOR SUPERVISOR

TAB 8

COMPANIES HOUSE DOCUMENTS

TAB	DOCUMENT
8.1	Companies House Documents

Companies House

Companies House does not verify the accuracy of the information displayed
(<http://resources.companieshouse.gov.uk/serviceinformation.shtml#complinfo>)

BETA This is a trial service — your [feedback \(https://www.research.net/r/chbeta\)](https://www.research.net/r/chbeta) will help us to improve it.

Search for companies or officers

PARMA (MIDLANDS) LTD

Company number **11164703**

Registered office address

23 Broom Hall Crescent, Birmingham, United Kingdom, B27 7JR

Company status

Active

Company type

Private limited Company

Incorporated on

23 January 2018

Accounts

Next accounts made up to **31 January 2020**
due by **31 October 2020**

Last accounts made up to **31 January 2019**

Confirmation statement

Next statement date **7 January 2020**
due by **21 January 2020**

Last statement dated **7 January 2019**

Nature of business (SIC)

- 68209 - Other letting and operating of own or leased real estate

[Is there anything wrong with this page?](#)

Companies House

Companies House does not verify the accuracy of the information displayed

(<http://resources.companieshouse.gov.uk/serviceinformation.shtml#compInfo>)

BETA This is a trial service — your [feedback \(https://www.research.net/r/chbeta\)](https://www.research.net/r/chbeta) will help us to improve it.

Search for companies or officers

PARMA (MIDLANDS) LTD

Company number **11164703**

- [Officers](#)
- [Persons with significant control \(https://beta.companieshouse.gov.uk/company/11164703/persons-with-significant-control\)](https://beta.companieshouse.gov.uk/company/11164703/persons-with-significant-control)

Filter officers

☐

Current officers

Apply filter

2 officers / 0 resignations

BROWN, Gary Raymond

Correspondence address **23 Broom Hall Crescent, Birmingham, United Kingdom, B27 7JR**

Role **Active Director**

Date of birth **December 1975**

Appointed on **29 October 2018**

Nationality **British**

Country of residence **England**

Occupation **Co Director**

PARMA, Daniel

Correspondence address **23 Broom Hall Crescent, Birmingham, United Kingdom, B27 7JR**

Role Active **Director**

Date of birth **September 1977**

Appointed on **23 January 2018**

Nationality **British**

Country of residence **United Kingdom**

Occupation **Co Director**

Is there anything wrong with this page?

Companies House

Companies House does not verify the accuracy of the information displayed
(<http://resources.companieshouse.gov.uk/serviceInformation.shtml#complinfo>)

BETA This is a trial service — your feedback (<https://www.research.net/r/chbeta>) will help us to improve it.

Search for companies or officers

PARMA (MIDLANDS) LTD

Company number **11164703**

- Officers (<https://beta.companieshouse.gov.uk/company/11164703/officers>)
- Persons with significant control

1 active person with significant control / 0 active statements

Mr Gary Raymond Brown Active

Correspondence address **23 Broom Hall Crescent, Birmingham, United Kingdom, B27 7JR**

Notified on **2 January 2019**

Date of birth **December 1975**

Nationality **British**

Nature of control **Ownership of shares – More than 50% but less than 75%**

Country of residence **England**

Mr Daniel Parma Ceased

Correspondence address **23 Broom Hall Crescent, Birmingham, United Kingdom, B27 7JR**

Notified on **23 January 2018**

Ceased on **2 January 2019**

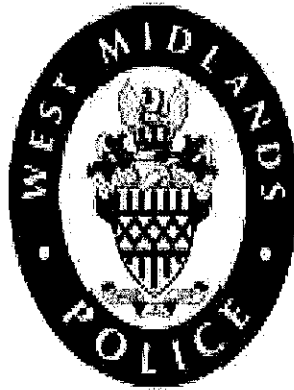
Date of birth **September 1977**

Nationality **British**

Nature of control **Ownership of shares – 75% or more**

Country of residence **United Kingdom**

[Is there anything wrong with this page?](#)



Evidence for the
Sexual Entertainment Hearing for
Paradise Club
193-194 Broad Street
Birmingham

RESTRICTED DOCUMENT



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WITNESS STATEMENT

Criminal Procedure Rules, r 27.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B

Crime No. URN

Statement of Abdool Rohomon

Age if under 18 (If over 18 insert "over 18")

Occupation *Police Officer*

This statement (consisting of *8* page(s) 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 in it anything which I know to be false, or do not believe to be true.

Signature:

(witness) *[Signature]*Date *11/4/19*Tick if witness evidence is visually recorded ☐ (supply witness details on rear)

I am the above named officer, currently a serving Police officer within West Midlands Police. I have been a serving Police Officer for 27.5 years based in Birmingham City Centre, for the last 16 years of my career I have been a licensing officer for the City Centre.

I have extensive knowledge and experience of dealing with the Licensing Act 2003, I sit on the NPCC (National Police Chiefs Council) licensing sub-group which advises on licensing issues. I have qualifications in risk management, risk assessments, and inspecting licensed premises.

This statement is in relation to an application made for a premises located at 193-194 Broad Street, Birmingham B15 1AY. Although there is no name of the business on the application West Midlands Police are aware that it is a premises called "Paradise Club".

The address of the premises is well known to me as this was the exact location of a premise called "Legs 11". This was an establishment that had both an alcohol licence and an SEV licence and operated as a lap dancing club. I had extensive dealings with these premises, being the lead licensing officer when West Midlands Police applied for the expedited review of the premise licence and then the objection to the renewal of the SEV licence.

This statement will deal with the new application first and then how this relates to the previous premises, its management and the issues that were experienced at the location and also the grounds that West Midlands Police used for lodging an objection to the application.

As per the objection letter it is prudent to detail the relevant grounds for the objection –

The SEV policy for Birmingham City council sets out the relevant grounds for an objection to be lodged. West Midlands Police base this objection under the following grounds –

- The applicant is unsuitable to hold an SEV licence

Signature *[Signature]*

Signature witnessed by

03/2016

OFFICIAL – (when complete)

Page 244 of 384

(A)

Crime No. URN

Statement of Abdool Rohomon

•That the SEV, if granted would be carried on for the benefit of person/s who would be refused an SEV licence if they had applied themselves.

The SEV policy also indicates mandatory and discretionary grounds that the licensing committee can refer to, to refuse any such application.

In the discretionary grounds it states

- the applicant is unsuitable to hold the licence by reason of having been convicted of an offence or for any other reasons;

- if the licence were to be granted, renewed or transferred the business to which it relates would be managed by or carried on for the benefit of a person, other than the applicant, who would be refused the grant, renewal or transfer of such a licence if he/she made the application himself/herself;

The basis of the objection by West Midlands Police falls under the above criteria and for the following reasons.

As stated previously these premises used to be called Legs 11, which was a premise that conducted activity under an SEV licence. The SEV licence and the premise licence under the licensing act 2003 were both revoked in 2017.

At the time Legs 11 was being run, it was being operated by a company called "Clear Blue Sky thinking limited". At the time when the premise was being operated "Clear Blue Sky thinking limited" had two directors, a Thomas Taylor and Sidney Taylor.

The DPS under the premise licence was an Edmund Haxhia.

Due to complaints being received through Action Fraud and to the licensing authority enquiries were made through 2017 into the running of the venue and its operations.

During these investigations it was discovered that another company called "Take it back limited" was also involved in the operational control of the premise, as they were taking all the payments from the debit/credit card PDQ machines as well as.

West Midlands Police are also aware that the public liability insurance held for both Legs 11 Broad Street and Ladywell Walk, was taken out by companies controlled by a Daniel Parma. The insurance for Legs 11 Broad Street, was taken out by Take it back ltd which as described below is a company with Parma as the sole director. The Ladywell Walk premises was taken out by Dansid Limited.

Both insurance policies have the name of the insured as "Take it back ltd t/a as Legs 11" for Broad Street

Signature Signature witnessed by 

03/2016

OFFICIAL – (when complete)

Crime No. URN

Statement of Abdool Rohomon

and "Dansid Ltd t/a as Legs 11" for Ladywell Walk.

From a Companies House search "Take it back limited" and "Dansid Limited " are still shown as active companies. Micro accounts have been filled for both companies, Take it Back Limited were completed on the 29th March 2018 and Dansid limited on the 30th Nov 2017, with the nature of the business described as Licensed Clubs.

The sole director of these companies is called Daniel Parma. Parma was not mentioned on any previous application for Legs 11, although it was and still is very clear that he was involved in the premises as he was taking payments through the PDQ machine and obtaining insurance for both premises.

West Midlands Police strongly believe that Parma was the main person behind the running of Legs 11, even though he was not mentioned on any application. When officers conducted a visit at Legs 11 Ladywell Walk, after the closure of the Broad Street premises they were greeted by staff and when asked who was in charge directed officers to Parma.

This is reinforced with the details surrounding the public liability insurance and this evidence shows the level of control that Parma had on the premises although this was not reflected in any of the licenses issued to either of the premises.

The involvement of Parma and the way Legs 11 Broad Street was run that ultimately led to the revocation of the SEV license and Premise licence is very significant. Through 2017 investigations took place in relation to alleged sexual activity being offered to patrons in the premises. Officers seized CCTV to investigate the complaints, during which time evidence was discovered that corroborated complaints that had been received around fraudulent activity of customer credit/debit cards.

From 2013 complaints had been received that customers were having very large sums of money taken from bank accounts, after visiting the premises. In the early part of 2017 there had been 4 such reports where the total taken had reached £23,965.

By the time these complaints had been received, the delay in the processing meant that the CCTV was not available to corroborate the allegations. Customers had to deal with telling family members, the potential embarrassment and stress which compounded the delay in the process.

One customer in 2017 had £9,000 taken from his account. The day after visiting the premises he bought a home drugs testing kit, which indicated that he had Methadone in his system, a drug he had never taken.

This was not the first time such allegations were made, a common theme of the complaints was that customers did not remember anything of the night and concluded that they had either been drugged or had

Signature 

Signature witnessed by

03/2016



Crime No. URN

Statement of Abdool Rohomon

been given large volumes of alcohol.

It was when officers were reviewing the cctv that officers saw evidence of numerous people who appeared to be very drunk, or under the influence of other substances in the booths. In most cases they were encouraged to drink more by the dancers. The CCTV showed where drunk customers would hand over cards for the PDQ machines who were not in control of what they were doing.

Whilst it is not sure of any of the persons seen on the CCTV were those who had reported any offences to Action Fraud, but West Midlands Police were satisfied that is corroborated evidence from previous reports.

West Midlands Police are also aware that officers from the local authority conducted a test purchase at the premises and were offered sexual activities as an extra payment, which is contrary to what is permitted within the confines of the SEV license.

What this shows is that there was a very badly run premises, that was exploiting customers who had been to the premises, putting their safety at risk all for financial gain. One of the key names involved in the premises when this activity was taking place was Daniel Parma.

On the 10th October 2018 I was sent an email from Peter Adkins, who is a director of regulatory services/licensing for Emms, Gilmore, Liberson solicitors. I have known Peter for some time through licensing applications, and also his involvement in licensing applications for Legs 11, which is what the premises used to be known as.

In the email it was stated that he had been instructed by Danny Parma, who was looking to re-open the former Legs 11 at 192/193 Broad Street as an SEV. The email stated that they were working with other people on this project and were asking for a meeting. The indication from the email was that Mr Parma would be operating the venue and that the DPS would be a Gary Brown.

I initially replied that West Midlands Police would more than likely be objecting to such an application but if they felt it prudent we could meet. The reason for this initial assessment was I was fully aware of Danny (Daniel) Parma as I had substantial evidence to show his involvement in the previous premise called Legs 11. I will detail those dealing later.

After discussions with our legal department, West Midlands Police felt it unwise to meet with the applicant, and wait until an application was received and then if there was the need to meet and talk that would be afforded to them. This was communicated in an email on the 12th October 2018 to Mr Adkins.

On the 23rd November 2018, West Midlands Police received an application for a new premise licence for 193-194 Broad Street, Birmingham.

Signature 

Signature witnessed by

03/2016

Crime No. URN

Statement of Abdool Rohomon

The applicant details were shown as a Gary Brown, and the applicant business as Parma (midlands) limited. The application was seeking a 24 hour licence for Live music, recorded music, provisions of dance, supply of alcohol and late night refreshment between 2300-0500. They had also completed the operating schedule to include how the licensing objectives would be promoted.

On looking at the application I was concerned, the name of the applicant was Gary Brown, with the business he worked for called Parma (Midlands) limited. My immediate thoughts about this was again Daniel Parma was trying to distance himself from actually being named on an application, although in reality he would be in charge of it.

In the email from Peter Adkins on the 10th October it was clear that the proposed operator would be Danny Parma. This is a reflection on what had happened before at Legs 11, where all the licenses were held in other names but evidence showed that Parma was the controlling figure.

I also did a Companies House search on Parma(Midlands)limited. From their records it shows the company was incorporated on the 23rd January 2018. From the history it shows at the time the company was incorporated the sole director was a Daniel Parma. It then shows on the 29th October 2018 that another director was added to the company named as Gary Raymond BROWN.

I noted that this appointment for Brown was made after West Midlands Police had received the email on the 10th October from Mr Adkins indicating he was acting for Danny Parma, and the Gary Brown would be the DPS. I was therefore somewhat surprised that there was no reference to Daniel Parma in this application, and could only be an attempt again to distance Parma from the legal applications.

I then checked the conditions that were being offered on the operating schedule, I was aware that this application was for a premises located in a location that was covered by a cumulative impact policy, and as such there was a rebuttable presumption that the licence be refused unless the applicant can show it would not add to crime and disorder.

On checking the proposed conditions against the conditions that were granted for Legs 11, it was clear that the proposed conditions on the application by Brown were a direct cut and paste from the Legs 11 licence, with a few very minor changes. None of the changes could be deemed as significant, for instance a condition around dancer profiles, on the old Legs 11 licence it stated there would be 2 profiles, whereas the new application changed that to a premises will retain a file, so in fact was of a lesser standard to that impose on the Legs 11 licence.

Also on the SEV application it showed that the proposed manager is going to Ruxandra Niculescu, she was involved with the sister venue also called Legs 11 on Ladywell walk and was aware of Daniel Parmas

Signature 

Signature witnessed by

03/2016

Crime No. URN

Statement of Abdool Rohomon

involvement in the business.

The Head doorman that is proposed was the same head doorman as when Legs 11 Broad Street operated, which again goes to show that the same people involved in the previous premises are being brought back.

In the licensing review applications I personally submitted a number of statements that show the evidence that Daniel Parma was the controlling factor in the management of the premise and not Sidney or Thomas Taylor. There were also statements from other Police officers and council licensing officers which also corroborate this assertion.

To summarise this evidence,

8th August 2016 intelligence graded B21 has been received that Daniel Parma killed someone in Albania and due to the revenge attacks were launched against Parma family in which seven members of his family were killed. Parma then fled to the UK.

19th June 2016 intelligence graded B41 has been received that Daniel Parma is linked to the trafficking of women from Eastern Europe with the intention of them working in the two legs 11 clubs in Birmingham that are operating as lap dancing clubs and brothels. Parma is running brothels around the UK. Parma will use firearms to facilitate his criminality.

10th Feb 2011 Parma was stopped by Police in a vehicle with two eastern European females. The females admitted they worked in "Bunnies" massage parlour but refused police assistance.

Parma was also shown as having an interest control of a number of companies, those being –

- Dansid limited, company number 08295260. Parma is still shown as the active Director, although from companies house there is action to strike off
- Legs 11 Europe Ltd, company number 09758460. Parma is shown as a Director with Sidney Taylor, with the company being dissolved on the 24th October 2017. Parma and Taylor were appointed in 2015 as directors
- Take it back limited, company number 08048966. Parma is sole director of this company, which is still active.

I have taken copies of all these reports and can produce them as (ex AR1)(ref no)

I have detailed in previous statements, which are within this bundle around the investigations that showed Parma was the controlling figure in Legs 11. This is confirmed further by the fact that after the Legs 11 Broad Street, had its premise licence under the Licensing Act 2003 suspended on the 4th July 2017, Daniel

Signature 

Signature witnessed by

03/2016

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Crime No. URN

Statement of Abdool Rohomon

Parma moved to Legs 11, Ladywell Walk.

This is another lap dancing venue ran by the same people/company as the Broad Street venue. I visited these premises shortly after the suspension of the Broad Street licence, to do a compliance check. As soon as I walked in I asked to see the manager and was told by the staff that I would have to speak to "Danny". I was shown into the CCTV office where Daniel Parma appeared and then produced the dancer records and showed us the CCTV.

I have also been sent 3 copies of documents that were taken by Birmingham City Council licensing department. They are an insurance documents pertaining to Legs 11 Broad Street and also Legs 11 Ladywell walk, and then a copy of a PRS certificate for Legs 11 Broad Street.

I am aware that the public liability insurance certificate for Broad Street had been sent by email to Christina McCullough (BCC licensing officer) on the 15th November 2016 by Ruxandra Niculescu who was the DPS for Legs 11, Ladywell Walk. The liability insurance for Ladywell Walk was also sent by Ruxandra Niculescu on the 14th November 2016 again to Christina McCullough. I have been sent the emails that show this.

The picture of the PRS certificate was taken by Christina McCullough when she attended the premises on the 25/4/2017

Both are images of the public liability certificates for both premises. The policy for Broad Street is policy number QBECC/000000189 valid from 04/06/2016 to 04/06/2107. The name of the insured is "Take it back limited t/a Legs 11". As can be seen from companies "Take it back limited" is still an active company with Daniel Parma as the sole director. This insurance was valid for the period when West Midlands Police were investigating the serious criminal complaints from Legs 11, Broad Street. I can produce this as (ex AR2)(ref no)

The second insurance certificate is for Legs 11, 30 Ladywell Walk, Birmingham. The policy number is I11/112014/CC/001041 valid from 01/03/2016 to 14/01/2017. The name of the insured is "Dansid limited trading as Legs 11". As can be seen from companies house Dansid limited is still listed, with Daniel Parma as the sole director with a proposal to strike action. I can produce this as (ex AR3)(ref no).

The third certificate is the PRS – which is the performing rights society, which was presented to "Take it back limited" for business "Legs 11, 193-194 Broad Street, Birmingham. This is dated 01/01/2013, from companies house we are aware that Take it back limited was incorporated on the 27/04/2012.

This further confirms that the companies that Daniel Parma is control of are in fact the controlling companies for the old premises and yet did not appear on the premise licence or Sev licenses.

Signature 

Signature witnessed by

03/2016

OFFICIAL – (when complete)

Page 250 of 384

(9)

OFFICIAL – (when complete)

MG11

Crime No.

URN

Statement of Abdool Rohomon

On the 15th October 2018 – I contacted Birmingham City Council business rates department, they confirmed by email that the business rate liability had been placed in the name of Daniel Parma, he was paying the liability via Direct Debit which was up to date. The liability has been placed in the name of Daniel Parma as he holds the lease for the building.

I have to conclude that the fresh application for what we believe is called "Paradise Club" will be run and controlled by Daniel Parma. Parma has already shown as disregard for the licensing objectives and that he is prepared to allow any activity in his premises for the purposes of him making as much money as possible.

If Parma was to be allowed this SEV application, then I have no confidence that the serious criminal activity that we saw take place before would take place again.



Signature

Signature witnessed by

03/2016

OFFICIAL – (when complete)

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(H)

Certificate of Public Liability Insurance

Policy Number I11/112014/CC/001041
Irisys Reference 0000TK94
Name of Insured Dansid Limited trading as Legs 11
Correspondence Address 30 LADYWELL WALK
BIRMINGHAM
B5 4ST

Period of Insurance

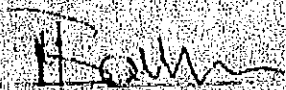
Effective Date and Time 01/03/2016 00:01
Expiry Date and Time 14/01/2017 00:01

Business Details

The Trade(s) Insured Gentlemen's / Business Club

Public Liability Limit of Indemnity Any £2,000,000
One Claim or series of claims arising out of Any One Event

Signed on behalf of QBE Insurance (Europe) Limited (Authorised Insurers)



Chief Underwriting Officer
Authorised Signatory

Public Liability Insurance is provided to the Insured under the above noted Policy Number and is subject to the terms and conditions and exclusions of the Policy

Your Insurers

Insurer: QBE Insurance (Europe) Limited
Registered Office: Plantation Place, 30 Fenchurch Street, London, EC3M 3BD
Registered Number: 1761561
FCA Register Number: 202842

QBE Insurance (Europe) Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority

Your Agent

Agency

Agent Name
Agent Telephone Number
Agent Address
Agency Number

2016

Public Liability - Evidence of Insurance

Policy Number: QBEC/000000189
 Ipsm Reference: 0000WB9M
 Name of Insured: Take It Back Ltd t/a Legs 11
 Correspondence Address: 193-194
 BROAD STREET
 BIRMINGHAM
 B15 1AY

Period Of Insurance

Effective Date and Time: 04/06/2016 00:01
 Expiry Date and Time: 04/06/2017 00:01

Business Details

The Trade(s) Insured: Gentlemen's / Business Club
 Public Liability Limit of Indemnity Any One Claim or series of claims arising out of Any One Event: £2,000,000
 Signed on behalf of QBE Insurance (Europe) Limited (Authorised Insurers)



Chief Underwriting Officer
 Authorised Signatory

Public Liability Insurance is provided to the Insured under the above noted Policy Number and is subject to the terms and conditions and exclusions of the Policy

Your Insurers

Insurer: QBE Insurance (Europe) Limited
 Registered Office: Plantation Place, 30 Fenchurch Street, London, EC3M 3BD
 Registered Number: 1761561
 FCA Register Number: 202842
 QBE Insurance (Europe) Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority

Your Agent

Agency:
 Agent Name:
 Agent Telephone Number:
 Agent Address:
 Agency Number:

[Redacted Agent Information]

(5)

PRRS
100% Royalties
Guaranteed
No Exceptions
100%

Supporting the writers and composers of the world



Your business to life with music

100% Royalties

Guaranteed

Abdool Rohomon

From: Christina McCullough <Christina.McCullough@birmingham.gov.uk>
Sent: 27 March 2019 13:29
To: Abdool Rohomon
Subject: Broad St
Attachments: Scanbot 15 Nov 2016 00.21.pdf; ATT00001.txt

Christina McCullough
Licensing Enforcement Officer

Tel. 0121 303 9358 Fax. 0121 303 9982

Secure email: Christina.X.McCullough@birmingham.gcsx.gov.uk

Birmingham City Council,
Licensing Section,
P.O. Box 17013,
Birmingham,
B6 9ES

www.birmingham.gov.uk/licensing

Twitter: @BCCLicensing

For information on Birmingham Licensed premises including licensed hours, activities and conditions go to
<http://publicregister.birmingham.gov.uk>

Locally accountable and responsive fair regulation for all - achieving a safe, healthy, clean, green and fair trading city for residents, business and visitors.

-----Original Message-----

From: Ruxandra Niculescu [mailto:ruxandra.niculescu@birmingham.gov.uk]
Sent: Tuesday, November 15, 2016 12:24 AM
To: Christina McCullough
Subject: Scanbot 15 Nov 2016 00.21.pdf

Hello Miss Christine

This is the certificate for Broad Street just in case they cannot find it either Thank you

The information contained within this e-mail (and any attachment) sent by Birmingham City Council is confidential and may be legally privileged. It is intended only for the named recipient or entity to whom it is addressed. If you are not the intended recipient please accept our apologies and notify the sender immediately. Unauthorised access,

Abdool Rohomon

From: Christina McCullough <Christina.McCullough@birmingham.gov.uk>
Sent: 27 March 2019 13:29
To: Abdool Rohomon
Subject: Ladywell Walk
Attachments: Scanbot 14 Nov 2016 23.49.pdf; ATT00001.txt

Christina McCullough
Licensing Enforcement Officer

Tel. 0121 303 9358 Fax. 0121 303 9982

Secure email: Christina.X.McCullough@birmingham.gcsx.gov.uk

Birmingham City Council,
Licensing Section,
P.O. Box 17013,
Birmingham,
B6 9ES

www.birmingham.gov.uk/licensing

Twitter: @BCC Licensing

For information on Birmingham Licensed premises including licensed hours, activities and conditions go to
<http://publicregister.birmingham.gov.uk>

Locally accountable and responsive fair regulation for all - achieving a safe, healthy, clean, green and fair trading city for residents, business and visitors.

-----Original Message-----

From: Ruxandra Niculescu [mailto:ruxandra.niculescu@birmingham.gov.uk]
Sent: Monday, November 14, 2016 11:52 PM
To: Christina McCullough
Subject: Scanbot 14 Nov 2016 23.49.pdf

Hello Miss Christina,
Please find attached the liability certificate Thank you

The information contained within this e-mail (and any attachment) sent by Birmingham City Council is confidential and may be legally privileged. It is intended only for the named recipient or entity to whom it is addressed. If you are not the intended recipient please accept our apologies and notify the sender immediately. Unauthorised access, use, disclosure, storage or copying is not permitted and may be unlawful. Any e-mail including its content may be

Companies House

Companies House does not verify the accuracy of the information displayed
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BETA This is a trial service — your [feedback \(https://www.research.net/r/chbeta\)](https://www.research.net/r/chbeta) will help us to improve it.

Search for companies or officers

TAKE IT BACK LIMITED

Company number **08048966**

Registered office address

23 Broom Hall Crescent, Birmingham, England, B27 7JR

Company status

Active

Company type

Private limited Company

Incorporated on

27 April 2012

Accounts

Next accounts made up to **30 June 2018**
due by **31 March 2019**

Last accounts made up to **30 June 2017**

Confirmation statement

Next statement date **27 April 2019**
due by **11 May 2019**

Last statement dated **27 April 2018**

Nature of business (SIC)

- 56301 - Licensed clubs

[Is there anything wrong with this page?](#)

Companies House

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Search for companies or officers

TAKE IT BACK LIMITED

Company number **08048966**

- [Officers](#)
- [Persons with significant control \(https://beta.companieshouse.gov.uk/company/08048966/persons-with-significant-control\)](https://beta.companieshouse.gov.uk/company/08048966/persons-with-significant-control)

Filter officers



Current officers

Apply filter

1 officer / 0 resignations

PARMA, Daniel

Correspondence address **23 Broom Hall Crescent, Birmingham, England, B27 7JR**

Role Active **Director**

Date of birth **September 1977**

Appointed on **27 April 2012**

Nationality **British**

Country of residence **United Kingdom**

Occupation **Director**

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Search for companies or officers

DANSID LIMITED

Company number **08295260**

Registered office address

[REDACTED]

Company status

Active — Active proposal to strike off

Company type

Private limited Company

Incorporated on

15 November 2012

Accounts

Next accounts made up to **30 November 2018**
due by **31 August 2019**

Last accounts made up to **30 November 2017**

Confirmation statement overdue

Next statement date **15 November 2018**
due by **29 November 2018**

Last statement dated **15 November 2017**

Nature of business (SIC)

- 56301 - Licensed clubs

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Search for companies or officers

DANSID LIMITED

Company number **08295260**

- [Officers](#)
- [Persons with significant control \(https://beta.companieshouse.gov.uk/company/08295260/persons-with-significant-control\)](https://beta.companieshouse.gov.uk/company/08295260/persons-with-significant-control)

Filter officers



Current officers

Apply filter

1 officer / 0 resignations

PARMA, Daniel

Correspondence address **[REDACTED]**

Role Active **Director**

Date of birth **September 1977**

Appointed on **15 November 2012**

Nationality **British**

Country of residence **United Kingdom**

Occupation **Director**

[Is there anything wrong with this page?](#)

Companies House

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Search for companies or officers

LEGS 11 EUROPE LTD

Company number **09758460**

- [Officers](#)
- [Persons with significant control \(https://beta.companieshouse.gov.uk/company/09758460/persons-with-significant-control\)](https://beta.companieshouse.gov.uk/company/09758460/persons-with-significant-control)

Filter officers



Current officers

Apply filter

2 officers / 0 resignations

PARMA, Daniel

Correspondence address [REDACTED]

Role **Director**

Date of birth [REDACTED]

Appointed on **2 September 2015**

Nationality **Albanian**

Country of residence **United Kingdom**

Occupation **Director**

TAYLOR, Sidney John

Correspondence address [REDACTED]

Role **Director**

Date of birth [REDACTED]

Appointed on **2 September 2015**

Nationality **British**

Country of residence **England**

Occupation **Director**

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Companies House

Companies House does not verify the accuracy of the information displayed
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Search for companies or officers

LEGS 11 EUROPE LTD

Company number **09758460**

Registered office address

Breslins Birmingham Ltd, Crosby Court, 28 George Street, Birmingham, England, B3 1QG

Company status

Dissolved

Dissolved on

24 October 2017

Company type

Private limited Company

Incorporated on

2 September 2015

Nature of business (SIC)

- 56301 - Licensed clubs

[Is there anything wrong with this page?](#)

Abdool Rohomon

From: Peter Adkins <[REDACTED]>
Sent: 10 October 2018 10:15
To: Abdool Rohomon
Subject: Proposed SEV and Premises Licence - Broad Street Birmingham Ref
EGL:MA:PAR010.001

Dear Abs

I have been instructed by Danny Parma who is looking to re-open the former Legs 11 site at 192/193 Broad Street as an SEV. He would be applying under a Company, Parma (Midlands) Limited. The intention is it will be rebadged under a new name Paradise City.

The premises obviously have a history, but I am advised that following the closure of Legs 11, no further action was taken against Mr Parma or any other of those involved in the management. They have been closed for over a year.

We have for some time been working with Danny and the proposed DPS (Gary Brown) on how to ensure the management of the proposed premises is fully robust and to deal with the various matters which led to the closure of Legs 11. There are new policies and management teams in place. The former DPS Edmund Haxia is not involved.

CCTV coverage will be changed and there are many other day to day changes proposed to the internal arrangements, monitoring of payments, staff and performers. Record keeping will also be changed. We have enlisted the assistance of Philip Kolvin QC and also a Licensing Consultant, Andy Bamber, who was a former Borough Commander at the Met and who dealt with the development of licensing and enforcement policies.

What I would like to do is to let you have a copy of the draft applications and supporting documents and arrange a meeting (presumably on site) for Andy Bamber and the management team to discuss the proposals and for you to raise any concerns you may have.

Are you happy to proceed in this way and to meet to discuss matters? If so can you let me have some suggested dates / times. Ideally we would like a Monday if possible.

More than happy to discuss this first over the telephone if you wish

Best wishes

Peter Adkins

Director of Regulatory Services / Licensing

DDI [REDACTED]
M [REDACTED]

EMMS·GILMORE·LIBERSON
Solicitors

Registered Office: Lancaster House | 67, Newhall Street | Birmingham | B3 1NQ
T: 0121 314 0000 | F: 0121 262 1870 | www.egl-law.com

Dakeyne Emms Gilmore Liberson Limited is registered in England and Wales under company number 6850969 authorised and regulated by the Solicitors Regulation Authority under SRA number 558275 (see <http://www.sra.org.uk/solicitors/handbook/code/content/page>). A list of the directors' names and their professional

Abdool Rohomon

From: [REDACTED]
Sent: 15 October 2018 13:58
To: Abdool Rohomon
Cc: [REDACTED]
Subject: RE: Legs 11 - Broad Street
Attachments: [REDACTED]
[REDACTED]

Hi Abs,

Until April it was "Take It Back Ltd T/A Legs 11" – they had arrears, but these were paid.

Current liable party is Mr Daniel Parma – he's paying by DD and up-to-date. He told us:

- Legs 11 stopped trading on 23 June;
- he has a new 6-year lease effective from 13 April;
- he has a new operating company called Parma (Midlands) Ltd;
- the business will be called Paradise City once licences have been obtained (August/September 2018);
- until then the premises are closed.

He also asked if he was entitled to any reductions [REDACTED].

We have put the liability in his name as he is the leaseholder.

I attach searches I've carried out on the companies and Parma. I see he's a director of both – [REDACTED]

Hope this helps!

Regards,

From: Abdool Rohomon [<mailto:a.rohomon@west-midlands.pnn.police.uk>]

Sent: Monday, October 15, 2018 12:36 PM

To: [REDACTED]

Subject: Legs 11 - Broad Street

Hi Andrew,

[REDACTED]
[REDACTED] if possible could you let me know who is responsible for the business rates and there status please

Many thanks as always

Abs

Abs Rohomon



BIRMINGHAM CITY COUNCIL
LICENSING AND PUBLIC PROTECTION COMMITTEE

FRIDAY 14 JULY 2017

LEGS 11 GENTLEMEN'S CLUB, 193-194 BROAD STREET, BIRMINGHAM
B15 1AY

LEGS 11 GENTLEMEN'S CLUB, 30 LADYWELL WALK, BIRMINGHAM B5
4ST

That, having reviewed the Sexual Entertainment Venue licence held under the Local Government (Miscellaneous Provisions) Act 1982 ("LP(MP)A 1982"), Schedule 3 by Clear Blue Sky Thinking Limited, in respect of:

LEGS 11 GENTLEMEN'S CLUB, 193-194 BROAD STREET, BIRMINGHAM
B15 1AY

AND

LEGS 11 GENTLEMEN'S CLUB, 30 LADYWELL WALK, BIRMINGHAM B5
4ST

Upon the application of Trading Standards, Licensing Enforcement and West Midlands Police, this Committee hereby determines to revoke the Sexual Entertainment Venue Licences in respect of the above premises.

The Committee heard from a Licensing Officer, Birmingham City Council; 2 ,



Trading Standards Enforcement Officers, Birmingham City Council; and an officer of West Midlands Police.

The Committee was specifically asked to consider paragraphs 15, 7.4(a) and (b), 8, 13 and Annex A of the Birmingham City Council Sexual Entertainment Venue Policy (2014) and also have regard to the policy generally. The Committee also noted that its own policy requires that each application will be dealt with on its own merits (para 1.6) and although the facts were connected the Committee considered each premises individually in coming to its decision.

The Committee noted that a licence can be revoked on the 'mandatory grounds' (paragraph 7.3 (a - e) or any one of the grounds at paragraph 7.4 (a) or (b) as set out in the policy (Schedule 3, paragraph 17(1), LG(MP)A 1982).

Counsel for the statutory bodies noted that both SEV licences were held by the same company with the same directors, namely Clear Blue Sky Thinking Ltd and Sidney J Taylor and Thomas W Taylor. The company also holds the premises licence under the Licensing Act 2003; the Committee acknowledged that the 1982 Act and the 2003 Act are separate regimes that operate parallel to each other.

The Committee noted that the bulk of the evidence was in respect of the premises at Broad Street. Counsel for the statutory bodies stated that if the premises licence holder was found to be unsuitable at the Broad Street premises it followed that the company was unsuitable to operate at the Ladywell Walk premises. After careful consideration the Committee agreed with this submission. In particular, but not limited to, the Committee noted the following factors:

- The SEV licences were held by the same company;
- The company also held the premises licences under the Licensing Act 2003;
- The DPS of the Ladywell Walk premises was observed at the Broad

Street site in what seemed to be a position of authority and in co-operation with the DPS of the Broad Street site; and

- The 'tout cards' listed both premises together.

The Committee carefully considered all the evidence in this matter and concluded that the operation of the premises at Broad Street was in blatant disregard of the conditions attached to the SEV licence.

The Committee concluded that the management and operation of the SEV premises failed to demonstrate an understanding of the general SEV conditions and failed to operate in a manner consistent with providing credible compliance with the SEV conditions. The management and operation of the premises failed to act in the best interests of the performers and patrons. The Committee concluded that there was no transparency to charging for the '*performances*' and noted the evidence of one of the Trading Standard's officers who stated in answer to questioning that he '*felt pressured to part with money*'.

The Committee also had regard to the evidence of the West Midlands Police and noted their serious concerns in respect of the ongoing fraud investigation and the allegation that the premises are associated with and being run by persons said to be associated with organised crime.

Counsel for the statutory bodies submitted that the premises at Broad Street although in the name of Clear Blue Sky Thinking Ltd was being managed or carried on for the benefit of someone else who would likely be refused the grant, renewal or transfer of the SEV licence if he or the company made any such application.

All of the statutory bodies provided clear evidence that the conditions of the SEV licences were being breached and that such breaches were an established part of the operation of the Broad Street premises. Whether it was touting, charging or the deliberately physical and sexual nature of the performance it was evident to the Committee that the matters raised were not a one-off exception but the norm.



The Committee concluded that the SEV licence holders were unsuitable to hold the SEV licence for the Broad Street premises and determined to revoke the SEV licence. Given the blatant operation of Broad Street the Committee did not have any confidence that the SEV licence holder was suitable to hold any licence in the City. The Committee considered that the Ladywell Walk premises' SEV licence was held by the same company under the direction of the self-same directors and therefore resolved to revoke the SEV licence at the Ladywell Walk premises.

In accordance with appeal provisions within Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982, a holder of any such licence whose licence is revoked, may at any time before the expiration of the period of 21 days beginning with the relevant date appeal to the magistrates' court acting for the relevant area. The "relevant date" means the date on which the person in question is notified of the refusal of his application, the imposition of the term, condition or restriction by which he is aggrieved or the revocation of his licence, as the case may be.

WITNESS STATEMENT

Criminal Procedure Rules, r 27.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B

Crime No. URN

Statement of Abdool Rohomon

Age if under 18 (if over 18 insert "over 18")

Occupation *Police Officer*

This statement (consisting of 3 page(s) 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 in it anything which I know to be false, or do not believe to be true.

Signature:

(witness)

Date

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

This is a further statement in relation to the evidence bundle submitted by the applicant, for ease of purpose I will deal with them as they appear in the bundle

- Statement of Andy Bamber. Whilst this statement is long there are only a couple of key points of relevance to the Police objection
- Section 50 talks about the removal of Daniel Parma from the day to day management of the premises. The key implication here is day to day, there is no reference to Daniel Parma being removed from the whole business, and it not being a business Parma would control.
- For me this is an exact replica of the situation before, Daniel Parma was the controlling figure of the previous Legs 11 premises and yet he did not appear on any licenses and so would not be seen as having that "day to day" control as mention in section 50 of this statement.
- There is no evidence submitted in this statement to show that Parma has been removed from the business. There is no mention that the solicitor that instructed Mr Bamber had already stated in writing to the West Midlands Police that he was representing Mr Daniel Parma
- Mr Bamber makes an assertion that Sexual Entertainment Venues do not contribute to any significant crime, disorder, and public nuisance. Whilst I couldn't comment on other venues I can comment on this site, that has caused significant crime, in terms of substantial fraud, drug supply and doping of individuals and even the offering a sexual activities by dancers.
- As this application is for Broad Street, it is relevant that the licensing committee understand the nature of what happened before. It was significant and serious enough to warrant the use of an expedited review application which is reserved for only serious crime and/or disorder.

Statement from Gary Brown

Signature

Signature witnessed by

03/2016

OFFICIAL – (when complete)

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Crime No. URN

Statement of Abdool Rohomon

- Mr Brown shows that he was an employee of the previous company Legs 11 and so as shown by West Midlands Police there is a link between the previous management and Mr Brown.
- Chapter 7 – Mr Brown states he was involved from the start, this is not corroborated by emails sent to West Midlands Police from the applicants solicitor, which clearly state they were instructed by Daniel Parma and no mention was made of Mr Brown.
- Mr Brown admits that Daniel Parma will still be a partner in the business, but a sleeping partner. With the previous involvement of Daniel Parma in Legs 11, where he was operating different companies to take payments from customers, but did not appear on any licence shows that Daniel Parma will not be a sleeping partner, he will be involved in the back ground whilst absolving himself of any responsibility.
- Chapter 27 – again shows a direct link with the previous management as Ruxandra Niculescu will be involved in the proposed operation as a manager. To West Midlands Police this shows that the management team of this application are from the old Legs 11 premises. In chapter 29 Mr Brown says this is a new broom, a statement that is not supported by West Midlands Police.
- Mr Brown goes further at chapter 31 where the new head of the door team will be the old doorman Zvaid Tsiklauri.
- To put this into context
 - oProposed DPS – Gary Brown – previous employee of Legs 11
 - oSleeping partner Daniel Parma – silent partner and holder of companies that operated through the old Legs 11
 - oRuxandra Niculescu – old DPS of Legs 11 (Ladywell walk), and when Parma was involved in the business
 - oZvaid Tsiklauri – old head doorman from Legs 11 Broad Street (Feb 2014 – Aug 2017)
- To West Midlands Police this shows there is no “new broom” as there is such a link from the previous premises.

Statement from Daniel Parma

- In reference to chapter 52, Mr Parma states that the cost for the application and going through this process, which will be many thousands of pounds, has been made through a loan from a company called Take it back Limited.
- This is a company solely owned by Daniel Parma, and the company that took the credit card payments from the old Legs 11 premises. I note that Mr Parma says the loan is not from himself, and yet it is from a

Signature 

Signature witnessed by

03/2016

OFFICIAL – (when complete)

MG11

Crime No.

URN

Statement of Abdool Rohomon

company he solely owns.

•This shows the financial involvement in theses premises by Daniel Parma and supports the fact West Midlands Police do not believe his assertions that he will be a sleeping partner

I have no comments to make around Zviad Tsiklauri other than is continues to show that the same management team are involved as previously and so this is not a new broom .



Signature

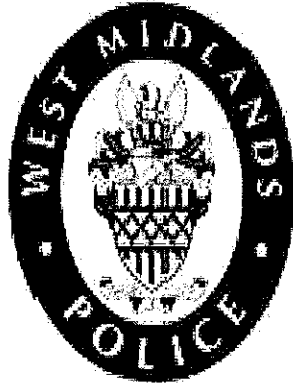
Signature witnessed by

03/2016

OFFICIAL – (when complete)

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AB



Evidence for the
Licensing Review of
Legs 11
193-194 Broad Street
Birmingham

REDACTED

RESTRICTED DOCUMENT



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West Midlands Police

CERTIFICATE UNDER SECTION 53A (1)(B) OF THE LICENSING ACT 2003

I hereby certify that in my opinion the premises described below are associated with serious crime and disorder

Premises: Legs 11
193-194 Broad Street
Birmingham
B15 1AY

Premise Licence Number: 1634

Premise Licence Holder: Clear Blue Sky Thinking Limited

Designated Premise Supervisor: Mr Edmond Haxhia

I am a Superintendent in West Midlands Police.

I am giving this certificate because I am in the opinion that the procedures under the Licensing Act are inappropriate in this case because the standard review procedures are thought to be inappropriate due to the seriousness of the crime associated with these premises.


The level and seriousness of the crimes being committed warrant the use of this power. I have considered the use of the normal review procedure but I do not feel this would be appropriate in these circumstances due to the above reasons, and the fact that to maintain the licensing objective of preventing crime and disorder the normal review procedure would not be sufficient.

The severity of the incident is a matter that needs to be brought to the attention of the Licensing Committee immediately.

The concern of West Midlands Police is that if steps are not taken to consider the running of these premises then other incidents that have happened at the premises could easily happen again and so compromise the Crime and Disorder objective.

I am conscious of the guidance on the use of "Expedited Reviews" and given the emphasis that is given to use of this power to tackle serious crime and/or disorder, my feelings that this process is deemed appropriate are further enforced.

Signed

 **MR EDMOND HAXHIA**



PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

Before completing this form please read the guidance notes at the end of the form. If you are completing the form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary

I - **Andrew PARSONS (SUPERINTENDENT Birmingham Central Police Station)**

(on behalf of) the chief officer of Police for the West Midlands Police area apply for the review of a premises licence under section 53A of the Licensing Act 2003

1. Premises details: **Legs 11**

Postal address of premises, (or if none or not known, ordinance survey map reference or description):

193 - 194 Broad Street

Post Town: **Birmingham**

Post Code (if known): **B15 1AY**

2. Premises Licence details:

Name of premise licence holder (if known):

Clear Blue Sky Thinking Ltd

Number of premise licence (if known):

1634

3. Certificate under section 53A (1)(B) of the Licensing Act 2003 (Please read guidance note 1)

I confirm that this is a certificate has been given by a senior member of the police force for the police area above that in his/her opinion the above premises are associated with serious crime or serious disorder or both, and the certificate accompanies this application.

(Please tick the box to confirm)



4. Details of association of the above premises with serious crime, serious disorder or both:
(Please read guidance note 2)

These premises are located on Broad Street, which is located in Birmingham City Centre. They benefit from the use of a Premise Licence issued under the Licensing Act 2003 and a Sexual Entertainment Licence issued under Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982.

They operate as a lap dancing club, with the sale of alcohol and regulated entertainment taking place.

The premise licence is held by Clear Blue Sky limited – from a search on companies house it shows that there are 2 directors of this company a Mr Sidney Taylor and a Mr Thomas Taylor (both shown living at the same address).

The Sexual Entertainment Licence shows that is held by Clear Blue Sky limited, the same two directors are shown and an Edmond Haxhia is shown as the manager of the premises.

The premises has and currently is subject to investigations around irregularities in financial transactions taken on the business PDQ machines, in that large volumes of money were being taken from peoples bank accounts.

Customers visiting the premises have stated that they have entered the premises freely, and then have dances in a private area, which have been paid for but then additional transactions have taken place which have not been authorised. The amounts vary from £282.70 being the lowest to £19,417 being the highest. In total £93,042.44 has been reported to Action Fraud for 17 offences over a period since 2013.

Notably in this year alone 4 Fraud offences have been reported totalling £23,965.00 with two of the victims reporting that they had been drugged. One of the victims went as far as getting a home drug test kit which indicated that he was under the influence of Methadone. This victim had £9,000.00 taken from his credit card.

Reports from the Fraud victims state that they were unaware of what was happening and no knowledge of the amounts being taken from their bank accounts.

On the 15th April officers from Birmingham City Council Trading Standards department conducted a compliance and test purchase exercise at the premises. During this exercise the officers were offered sexual services from two girls at the premises for a fee of £1000, that would take place in a locked room where there were no cameras and no one could see.

During the preceding investigation the CCTV was obtained from the premises. During that viewing it showed a male who was in a room with 2 females. The females were seen plying the male with alcohol, and then simulating sexual acts against him. From the CCTV the male would appear to be intoxicated.

This CCTV appeared to corroborate previous reports that the dancers were getting the males very drunk and then getting them to use their credit cards.

The PDQ machines have a company name of "Take it back limited" on the receipts. This company is neither the premise licence holder nor the holder of the Sexual Entertainment Licence.

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A companies House search has revealed that "Take it back limited" is a Private Limited Company, incorporated on the 27th April 2012, with its nature of business being "licensed clubs". The address registered for the company is the same as these licensed premises.

The sole director of this business is a Daniel Parma, he is noted as being the sole director of this company, having being appointed when the business was incorporated. Daniel Parma is not listed on the premise licence, and was not listed on the SEV renewal – which was submitted on the 28th October 2016.

The SEV application asks for all persons involved in the management of the premises to be listed, as the sole director of the company where money is being paid into he clearly has management control in the premises.

Intelligence has shown that since January 2017 £1.6 million pounds has been credited through this company.

Intelligence checks against Daniel Parma have also indicated that he is linked to Organised Crime Groups from Albania.

Daniel Parma has an active link to these premises, not just through the financial side of the business but also the management side, he has also been seen at the premises and attended the premises when warrants were executed against the premises on the 23rd June 2017.

These premises are involved in serious criminality and serious offences are being committed at the premises, which are deemed serious as defined by Section 81 of the Regulation Investigatory Powers Act 2000.

West Midlands Police are seeking the immediate suspension of the premise licence.

Signature of applicant:

Date:

Rank/Capacity:

Contact details for matters concerning this application: Pc 4075 Abdool ROHOMON

Address: Licensing Dept c/o Birmingham West and Central Police Station, Birmingham

Telephone Number(s): 0121 626 6099

E-mail - a.rohomon@west-midlands.police.uk

Notes for guidance:

1. A certificate of the kind mentioned in the form must accompany the application in order for it to be valid under the terms of the Licensing Act 2003. The certificate must explicitly state the senior officer's opinion that the premises in question are associated with serious crime, serious disorder or both.

Serious crime is defined by reference to section 81 of the Regulation of Investigatory Powers Act 2000. In summary, it means:

- conduct that amounts to one or more criminal offences for which a person who has attained the age of eighteen and has no previous convictions could reasonably be expected to be sentenced to imprisonment for a term of three years or more; or
- conduct that amounts to one or more criminal offences and involves the use of violence, results in substantial financial gain or is conduct by a large number of persons in pursuit of a common purpose.

Serious Disorder is not defined in legislation, and so bears its ordinary English meaning.

2. Briefly describe the circumstances giving rise to the opinion that the above premises are associated with serious crime, serious disorder or both.



BIRMINGHAM CITY COUNCIL

LICENSING SUB COMMITTEE - A

TUESDAY 4 JULY 2017

LEGS 11, 193-194 BROAD STREET, BIRMINGHAM, B15 1AY

That having considered the application made and certificate issued by West Midlands Police under Section 53A of the Licensing Act 2003 for an expedited review of the premises licence held by Clear Blue Sky Thinking Ltd in respect of Legs 11, 193-194 Broad Street, Birmingham, B15 1AY this Sub-Committee determines:

- That the licence be suspended with immediate effect pending a review of the licence, such a review to be held within 28 days of receiving the Chief Officer of Police's application

The Sub-Committee's reasons for imposing these interim steps are due to concerns by West Midlands Police in relation to matters which were outlined in the Chief Officer of Police's Certificate and Application.

The Sub Committee determined the causes of the serious crime and or serious disorder appeared to originate from a concerted, sophisticated and highly organised criminal operation being run from the premises which included but was not limited to financial fraud and human trafficking.

Whilst investigations into the extent to which the criminality extended, who was involved with this serious crime and how this was being conducted were continuing with reference to various enforcement agencies, the Sub Committee were presented with compelling evidence at this stage which satisfied them on the balance of probabilities that the premises were indeed associated with serious crime.

It was therefore necessary and reasonable to impose these steps to address the immediate problems with the premises, in particular the likelihood of serious crime and or serious disorder, and to promote the prevention of crime and disorder objective in the Act.

The Sub-Committee considered whether it could impose other interim steps including modification of licence conditions, exclusion of the sale of alcohol or other licensable activities, or removal of the Designated Premises Supervisor. The Sub-Committee did not believe however that any of these would address the totality of issues brought to their attention by the police.

In reaching this decision, the Sub-Committee has given due consideration to the City Council's Statement of Licensing Policy, the Guidance issued by the Home Office in relation to expedited and summary licence reviews, and the submissions

made by the police and their legal representative at the hearing, the totality of which was held in private in accordance with Regulation 14 of the Licensing Act 2003 (Hearings) Regulations 2005.

All parties are advised that the premises licence holder may make representations against the interim steps taken by the Licensing Authority. On receipt of such representations, the Licensing Authority must hold a hearing within 48 hours. When calculating the 48 hour period, any non-working day can be disregarded. Where the licensing authority has already held a hearing to consider representations against the interim steps, the holder of the licence may only make further representations if there has been a material change in circumstances.

All parties are advised that there is no right of appeal to a Magistrates' Court against the Licensing Authority's decision at this stage.



Public Register: Licence Report

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3. Premises Details
 - 3.1 Licensable Activities
 - 3.2 Activity Times
 - 3.3 Operating Hours
4. Conditions
 - 4.1 Mandatory Conditions
 - 4.2 Operating Conditions
 - 4.3 Committee Conditions
5. Licence History
6. Designated Premises Supervisor History
7. Events

1. Licence

Summary of the licence certificate.

Application Reference	73178
Licence Holder Name	Clear Blue Sky Thinking Limited
Registered Company Number	07065775
Licence Number	1634
Time Limited Start Date	N/A
Time Limited End Date	N/A
Issue Number	9
Issue Date	12/07/2011
Grant Date	24/11/2005
Granted By	David Kennedy
Status	Current
Representation Start Date	10/05/2011
Representation End Date	07/06/2011

2. Current Designated Premises Supervisor

A DPS is required wherever there is a licensed activity for the sale of alcohol for consumption on or off the premises.

Status	Assigned
Name	Mr Edmond Haxhia
Licence Number	7270
Issuing Authority	Birmingham

Start Date 04/08/2016

3. Premises Details

Details of the premises, the licensed activities and hours of operation.

Premises Name	Legs 11
Premises Type	LAP DANCING / NUDITY VENUE
Premises Address	193 - 194 Broad Street, Birmingham, B15 1AY
Ward Name	LADYWOOD

3.1 Licensable Activities

A list of activities for which this premises is licensed.

Code	Description
E	Live music
F	Recorded music
G	Performances of dance
H	Anything of similar description to that falling within (live music), (recorded music) or (performances of dance)
I	Provision of facilities for making music
J	Provision of facilities for dancing
L	Late night refreshment
M3	Sale of alcohol by retail (both on & off the premises)

3.2 Activity Times

The times of day during which the activities listed in 3.1 are permitted. Where the start time is later than the end time, the period of activity spans mid-night. Where the start time is equal to the end time, the period licensed is 24 hours.

Days	Start Time	End Time	Licensed Activity Codes
Monday - Sunday	00:00	23:59	E, F, G, H, I, J, M3
	23:00	05:00	L

3.3 Operating Hours

The hours of operation of the premises during the day. Where the start time is later than the end time, the period of operation spans mid-night. Where the start time is equal to the end time, the period of allowed operation is 24 hours.

Days	Start Time	End Time
Monday - Sunday	00:00	23:59

4. Conditions

4.1 Mandatory Conditions

Mandatory conditions attached to the licence.

Objective	Condition
N/A	Each individual assigned to carrying out a security activity must be licensed by the Security Industry Agency.

Objective	Condition
N/A	No supply of alcohol may be made under the premises licence (a) at a time when there is no designated premises supervisor in respect of the premises licence, or (b) at a time when the designated premises supervisor does not hold a personal licence or his personal licence is suspended.
N/A	Every retail sale or supply of alcohol made under this licence must be made or authorised by a person who holds a personal licence.

4.2 Operating Conditions

Operating conditions attached to the licence and classified by objective:

- General
- General conditions consistent with the operating schedule.
- Crime
- Conditions consistent with, and to promote the prevention of crime and disorder.
- Safety
- Conditions consistent with, and to promote public safety.
- Nuisance
- Conditions consistent with, and to promote the prevention of public nuisance.
- Child
- Conditions consistent with, and to promote the protection of children from harm.

Objective	Condition
GENERAL	The following adult entertainment is permitted at the Premises: Lap Dancing, Pole dancing and Topless Dancing in the Lounge Areas. Full nudity only permitted in the dance booths and private rooms.
GENERAL	Management will ensure that all staff received adequate training on a regular basis, relating to the four licensing objectives, general licensing regulations and fire regulations. A record of the training will be kept by management.
GENERAL	The Licence holder shall ensure - The premises will have a standard operating time for any licensing activity until 4am on any day save for New Years Eve/day. If the premises wish to operate past 4am for any licensable activity then the Designated Premises Supervisor must inform Steelhouse Lane Licensing department, in writing (which includes e mail), specifying the date, type of event and the proposed finishing hour at least 28 days prior for a risk event (event which attracts a selected audience type attracted by the activity within the premises), 14 days prior for a sporting event and 7 days prior for a non-risk event (or at any other time that is agreeable to both the Police and the DPS). West Midlands Police retain the power to veto any such increase in the standard operating hour if any of the 4 licensing objectives are/have been or are likely to be breached. West Midlands Police must inform the DPS of the reasons for invoking any such veto within a reasonable time prior to the commencement of the event, save for where they are exercising their closure powers under Licensing Act 2003. Where the premises are operated past 4am subject to the above clause the DPS or at least one Personal Licence Holder must be present on the premises at all times that the premises remain open. The DPS or nominated person shall keep, and maintain a register of door supervisors, in which shall be recorded at the start of each period of Duty and date, name, Door Supervisors registration number, commencement and finishing time. The finishing time shall be completed at the end of the period of duty. The DPS shall produce the register and the verification of Door Supervisors identities, upon request at all reasonable times to any Police Officer or to any Authorised Officer of the City Council.
GENERAL	The provision of regulated entertainment and late night refreshment to take place indoors only.
CRIME	The sale of alcohol will cease 30 minutes prior to the closure of the premises.
CRIME	Prominent notices shall be displayed informing the public that C.C.T.V. is in operation.
CRIME	Adequate door supervision shall be maintained.
CRIME	CCTV to be installed to the specifications and recommendations of West Midlands Police. The CCTV shall also cover the dancing booths to ensure no illegal activity is taking place within the booths and to offer protection for the dancers.
CRIME	CCTV footage will be kept for a minimum of 31 days and will be fit for purpose. CCTV images shall be made available to any responsible authority immediately on request.
SAFETY	The licence holder shall ensure - All on duty security/door supervisors must wear high visibility jackets whilst attending the door and must wear high visibility arm bands within the premises itself. The capacity of the premises will be a number as agreed from time to time with West Midlands Fire Service.
SAFETY	A zero tolerance policy towards drunken or anti - social behaviour is to be in operation on the premises at all times.
NUISANCE	Announcements are made at the end of the evening asking customers to leave the premises quietly, respecting any residents; signs are displayed on the exits asking the same.
NUISANCE	SIA registered security staff will oversee patrons arriving or departing the premises and not allow anti - social behaviour by individuals or groups. When necessary, advice will be given to such patrons not to do anything which may cause annoyance or disturbance to the local community.

Objective	Condition
CHILD	No persons under the age of 18 to be admitted to the Premises.
CHILD	There shall be no display of any promotional material externally on the premises to indicate the nature of the adult entertainment provided inside the premises.
CHILD	The Premises will adopt the Challenge 25 Policy for under age sales anyone appearing under the age of 25 will be asked for identification when purchasing alcohol.
CHILD	No photographs of naked or semi naked women or other images of striptease or similar dancing, to be displayed on the outside of the premises.
CHILD	No entertainment of an adult nature provided at the premises is to be visible to the passing public.
CHILD	The Premises will retain two profiles of all dancers who are employed at the premises or have been employed at the premises within the last 3 months. The profile shall contain proof of identity and age such as a valid passport or driving licence and a proof of address dated in the last 3 months such as a utility bill or other government document and the national insurance number. Profiles shall be made available to any responsible authority upon request.
CHILD	Dancers going into the smoking area outside of the Premises must be clothed so that no lingerie can be seen.

4.3 Committee Conditions

Conditions attached to the licence after a hearing by the licensing authority and classified by objective:

- General
- General conditions consistent with the operating schedule.
- Crime
- Conditions consistent with, and to promote the prevention of crime and disorder.
- Safety
- Conditions consistent with, and to promote public safety.
- Nuisance
- Conditions consistent with, and to promote the prevention of public nuisance.
- Child
- Conditions consistent with, and to promote the protection of children from harm.

Objective	Condition
GENERAL	N/A
CRIME	N/A
SAFETY	N/A
NUISANCE	N/A
CHILD	N/A

5. Licence History

The history of variation and transfer applications since the initial application for grant or conversion.

Reference	Applicant Name	Application Type	Application Date	Status	Representation Dates	Variation Reason
71011	Clear Blue Sky Thinking Limited	Transfer	09/12/2010	Varied	09/12/2010 To 23/12/2010	
67257	Leisure Nights Limited	Variation	10/05/2010	Transferred	04/05/2010 To 01/06/2010	<ul style="list-style-type: none"> ▪ Licence Conditions Changed ▪ Premises Usage Changed ▪ Premises Plan Changed
64891	Leisure Nights Limited	Transfer	18/12/2009	Varied	18/12/2009 To 01/01/2010	
61195	Ecko UK Ltd	Transfer	14/05/2009	Transferred	14/05/2009 To 28/05/2009	
57433	Mr Andrew Tatam	Variation	17/10/2008	Transferred	17/10/2008 To 14/11/2008	<ul style="list-style-type: none"> ▪ Premises Plan Changed
47952	Mr Andrew Tatam	Transfer	26/06/2007	Varied	17/01/2007 To 31/01/2007	

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Activity Hours Changed

A list of all Designated Premises Supervisors that have been responsible for sale of alcohol from the premises

Start Date	Finish Date	Name	Licence	Issuing Authority
26/04/2012	04/08/2016	Mr Michael McLean	3903	Birmingham
13/01/2011	26/04/2012	Mr Stefan Kreuter	314	Birmingham
29/07/2010	13/01/2011	Mr Floyd King	3828	Birmingham
29/07/2010	13/01/2011	Mr Floyd King	3828	Birmingham
04/01/2010	29/07/2010	Mr Soroush Aghamahdi	5111	Birmingham
04/01/2010	29/07/2010	Mr Soroush Aghamahdi	5111	Birmingham
04/01/2010	29/07/2010	Mr Soroush Aghamahdi	5111	Birmingham
30/09/2009	04/01/2010	Mr Andrew Tatam	18050336	Bromsgrove
30/09/2009	04/01/2010	Mr Andrew Tatam	18050336	Bromsgrove
30/09/2009	04/01/2010	Mr Andrew Tatam	18050336	Bromsgrove
29/05/2009	30/09/2009	Mr Paul Whelan	3926	Birmingham
29/05/2009	30/09/2009	Mr Paul Whelan	3926	Birmingham
29/05/2009	30/09/2009	Mr Paul Whelan	3926	Birmingham
29/05/2009	30/09/2009	Mr Paul Whelan	3926	Birmingham
29/05/2009	30/09/2009	Mr Andrew Tatam	18050336	Bromsgrove
01/11/2006	29/05/2009	Mr Andrew Tatam	18050336	Bromsgrove
01/11/2006	29/05/2009	Mr Andrew Tatam	18050336	Bromsgrove
01/11/2006	29/05/2009	Mr Andrew Tatam	18050336	Bromsgrove
02/03/2006	01/11/2006	Mr Dino Colombini	SOL/PE/145/2005	Solihull
02/03/2006	01/11/2006	Mr Dino Colombini	SOL/PE/145/2005	Solihull
02/03/2006	01/11/2006	Mr Dino Colombini	SOL/PE/145/2005	Solihull
02/03/2006	01/11/2006	Mr Dino Colombini	SOL/PE/145/2005	Solihull
02/03/2006	01/11/2006	Mr Dino Colombini	SOL/PE/145/2005	Solihull
02/03/2006	01/11/2006	Mr Dino Colombini	SOL/PE/145/2005	Solihull
07/08/2005	02/03/2006	Miss Preet Shergill	1538	Birmingham
07/08/2005	02/03/2006	Miss Preet Shergill	1538	Birmingham
07/08/2005	02/03/2006	Miss Preet Shergill	1538	Birmingham

Start Date	Finish Date	Name	Licence	Issuing Authority
07/08/2005	02/03/2006	Miss Preet Shergill	1538	Birmingham
07/08/2005	02/03/2006	Miss Preet Shergill	1538	Birmingham
07/08/2005	02/03/2006	Miss Preet Shergill	1538	Birmingham
07/08/2005	02/03/2006	Miss Preet Shergill	1538	Birmingham
07/08/2005	02/03/2006	Miss Preet Shergill	1538	Birmingham
07/08/2005	02/03/2006	Miss Preet Shergill	1538	Birmingham

7. Events

Other significant events recorded for this licence.

Date	Reference	Event Name
04/08/2016	73178	Designated Premises Supervisor Nominated
26/04/2012	73178	Designated Premises Supervisor Nominated
12/07/2011	73178	Issue
11/06/2011	73178	Licence Approval
09/05/2011	73178	Application Received (Variation)
13/01/2011	71011	Designated Premises Supervisor Nominated
13/01/2011	71011	Change Of Premises Name
13/01/2011	71011	Issue
13/01/2011	71011	Licence Approval
13/01/2011	71011	Licensable Activities Added/Changed
09/12/2010	71011	Application Received (Transfer)
16/08/2010	67257	Issue
16/08/2010	67257	Licence Approval
16/08/2010	67257	Committee Decision
16/08/2010	67257	Licensable Activities Added/Changed
29/07/2010	64891	Designated Premises Supervisor Nominated
10/05/2010	67257	Application Received (Variation)
03/02/2010	64891	Change Of Premises Name
04/01/2010	64891	Designated Premises Supervisor Nominated
04/01/2010	64891	Issue
04/01/2010	64891	Licence Approval
18/12/2009	64891	Application Received (Transfer)
30/09/2009	61195	Designated Premises Supervisor Nominated
18/09/2009	61195	Change Of Premises Name
29/05/2009	61195	Designated Premises Supervisor Nominated
29/05/2009	61195	Issue
28/05/2009	61195	Licence Approval
14/05/2009	61195	Application Received (Transfer)
03/12/2008	57433	Change Of Premises Name
03/12/2008	57433	Issue
24/11/2008	57433	Licence Approval

Date	Reference	Event Name
17/10/2008	57433	Application Received (Variation)
26/06/2007	47952	Issue
26/06/2007	47952	Licence Approval
04/05/2007	46069	Issue
04/05/2007	46069	Licence Approval
01/11/2006	32543	Designated Premises Supervisor Nominated
02/03/2006	32543	Designated Premises Supervisor Nominated
30/11/2005	32543	Issue
30/11/2005	32543	Licence Approval
24/11/2005	32543	Committee Decision
07/08/2005	32543	Application Received (Conversion-Variation)

© Birmingham City Council Licensing Section, P.O. Box 17013, Birmingham, B6 9ES

Tel: 0121 303 9896

Email: licensing@birmingham.gov.uk

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(14)

WITNESS STATEMENT

Criminal Procedure Rules, r 27.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B

Crime No. URN

Statement of Mark Phillip Bates

Age if under 18 O'18 (If over 18 insert "over 18")

Occupation Detective Constable 20835

This statement (consisting of page(s) 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 in it anything which I know to be false, or do not believe to be true.

Signature: (witness)

Date 19/06/2017

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

I am Detective Constable 20835 BATES of the West Midlands Police currently attached to the Serious & Organised Crime - Prevent Team. The Prevent Team has a core responsibility to prevent people from engaging or re-engaging in Serious and Organised Criminality.

I provide the following information as evidence in support of the closure of LEGS 11 GENTLEMAN'S CLUB LTD 193-194 BROAD STREET, BIRMINGHAM, B15 1AY under Section 80 Anti-Social Behaviour, Crime and Policing Act 2014. I rely on information in the form of Crime Reports, Recorded Incident Logs and Intelligence I have sourced from West Midlands Police intelligence systems.

LEGS 11 GENTLEMAN'S CLUB (BROAD STREET) is located on in the centre of Birmingham's Entertainment District. Revellers can enjoy themselves at a number of pub and clubs located in the immediate area. LEGS 11 BROAD STREET is frequented by members of the public, typically later into the night due to its license as a Sexual Entertainment Venue.

The club is very close to hotels and other residential properties.

This statement will outline that the club is ran by Organised Crime Groups and members of such are taking advantage of vulnerable members of the public who are under the influence of alcohol, or in some cases stupefied by employees of the establishments in order to obtain thousands of pounds from victims credit/debit cards.

In general the victims state that they enter the club freely as customers and pay for drinks. They then choose to have a dance in a private area. Whilst each victim states that they did ask for and paid for this service, further transactions were charged to their cards which they did not authorise. The amounts vary from £282.70 being lowest to £19,417.00 being the highest - in total £93,042.44 has been reported to Action Fraud as obtained in this manner over 17 offences over a period since 2013. Notably there have been four offences totalling £23,965.00 this year alone in which two of the victims are reporting that they have been

Signature

Signature witnessed by

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drugged. All of the reported offences, bar one - the £282.70 have been committed against males who do not reside in Birmingham.

On 3rd March 2017 a victim made a report of Fraud by False Representation via the Action Fraud website of being drugged in LEGS 11 GENTLEMAN'S CLUB (BROAD STREET). The subsequent investigation has uncovered a pattern of offences of this type dating back to March 2013. I believe that many more offences have gone unreported due to the nature of the venue and the social stigma associated with Sexual Entertainment Venues.

LEGS 11 GENTLEMAN'S CLUB (BROAD STREET) is operated under a business name of 'TAKE IT BACK LTD'. This company address is the same as this club. [REDACTED] is listed as the Sole Director of this company.

The Designated Premises Supervisor (DPS) is listed on Birmingham City Council Public Licensing systems as Edmond HAXHIA [REDACTED]

I believe the most serious reported offence occurred on 3rd March 2017 whereby the victim was drugged and had £9,000.00 taken from his credit card. The very next day the victim bought an over-the-counter drug testing kit and it is alleged to have shown that the victim was under the influence of Methadone. This is a drug that the victim stated on the Police Log he does not take nor has ever taken in his life. Unfortunately no statement was taken from him by officers.

Ref: NFRC170301772431 - 20BW/59361C/17.

Thefts by suspected drugging:

11th February 2017 - £1,430.00 was stolen and victim is making allegations he was drugged. The victim stated to ACTION FRAUD 'A FRIEND AND I VISITED LEGS 11 BROAD STREET, BIRMINGHAM ON 11/02/2017. WE WERE TARGETED BY A FEW GIRLS WHO ASKED US TO GO INTO A VIP ROOM. THEY TAKEN CASH OFF ME AT THAT POINT TO BE IN THAT ROOM. THEY THEN STATED THAT WE HAD TO PAY A FURTHER £330.00 AS WE WERE IN THAT ROOM AND IF WE DIDN'T THEY THREATENED THE BOUNCERS WOULD BEAT US UP FOR WASTING THEIR TIME. BOTH MY FRIEND AND I FELT SCARED AND WERE PRESSURED TO MAKE A CREDIT CARD PAYMENT. AT THE POINT THEY STARTED FORCING DRINK DOWN ME AND MY FRIEND, BEARING IN MIND MY FRIEND DON'T DRINK AND WAS GETTING VERY UNAWARE OF WHAT WAS GOING ON, WE THEN GOT PRESSURED AGAIN TO MAKE A FURTHER TRANSACTION OF £1,100.00 FOR BEING IN THAT ROOM! WHEN I QUESTIONED IT, ONE GIRL SHOUTED 'SHUT UP!' AND FORCED A DRINK DOWN ME AGAIN. TO GET OUT IF THE CLUB MY FRIEND HAD TO PAY AN EXTRA £500.00. THE

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FOLLOWING DAY, LLOYDS BANK TEXT MY FRIEND SAYING THEY HAD TRIED TO TAKE MORE MONEY OUT OF HIS BANK. IVE REPORTED THIS TO WEST MIDLANDS POLICE WHO ADVISED I SHOULD MAKE A REPORT ON THIS SITE. I WAS VERY SHOCKED THE WAY THEY TREATED US AND MADE ME FEEL WHILST IN THE CLUB. I FEEL LIKE THE PLACE IS A SCAM! THEY TARGET PEOPLE, FORCE DRINK (POSSIBLY DRUGS) DOWN THEM, AND PRESSURE/THREATEN THEM TO MAKE LARGE TRANSACTIONS. Ref: NRFC170201742952.

10th November 2016 - £6,578.00 was reported as stolen and the victim is making allegations he was drugged. IP states the following to ACTION FRAUD: 'UPON VISITING THE PREMISES OF LEGS 11 WITH SOME PEOPLE I MET AT THE HILTON GARDENS HOTEL I REMEMBER ONLY PURCHASING A BOTTLE OF CHAMPAIGNE AFTER THIS SEVERAL TRANSACTIONS TOOK PLACE IN WHICH I HAVE NO RECOLLECTION. WHILE IT IS POSSIBLE I WAS UNDER THE INFLUENCE OF ALCOHOL I HAVE NO RECOLLECTION AND WAS IN A STATE OF UNCONSCIOUSNESS UNTIL 1430 THE FOLLOWING DAY. I BELIEVE THAT I WAS TAKEN ADVANTAGE OF IN WHATEVER STATE I WAS IN AND THAT THESE TRANSACTIONS WERE TAKEN WITH MY KNOWLEDGE. IT IS ALSO POSSIBLE THAT I WAS GIVEN SOMETHING IN THE CLUB AS EVEN AFTER A HEAVY NIGHT I ALWAYS HAVE A RECOLLECTION. THE AMOUNTS TAKEN ARE AS FOLLOWS: 10/10/2016, £220, £660, £990, £1320, £2640. FROM MY PERSONAL ACCOUNT £748. THE INCREASE IN PAYMENTS OVER THE NIGHT WOULD SUPPORT THAT I WAS TAKEN ADVANTAGE OF AND THE FINAL PAYMENT OF £2640 DID TAKE THE CREDIT CARD OVER ITS LIMIT SO NO FURTHER TRANSACTIONS WERE POSSIBLE AFTER THIS'. Ref: NRFC161101636491.

4th October 2016 - £942.74 was stolen and the victim is making allegations he was drugged. ACTION FRAUD states 'THE VICTIM HAS CALLED TODAY ABOUT GOING TO MEET UP WITH MEMBER STAFF UP IN BIRMINGHAM THE VICTIM IS A DIRECTOR OF A COMPANY AND AFTER THIS MEETING THE VICTIM AND A FEW OF HIS ASSOCIATES WENT FOR DRINKS AND AT THE END OF THE NIGHT THEY ALL HEADED TO A LAP DANCING CLUB. THE VICTIM HAD £140.00 IN TWENTY POUND NOTES IN HIS POCKET ALONGWITH HIS DRIVING LICENSE AND DEBIT CARD. THEN IT WAS THE VICTIM TURN TO BUY THE DRINK THE VICTIM WENT TO PAY HE HAD NO CASH IN HIS POCKET SO HAD TO PAY FOR THE DRINK BY USING HIS DEBIT CARD AND HAD TO PUT THE PIN NUMBER IN THE READER. WHEN HE WOKE UP THE NEXT MORNING THE VICTIM HAD RECOLLECTION OF WHAT HAPPENED. THEN THE VICTIM WAS CONTACTED BY NATWEST FRAUD DEPARTMENT AND WAS INFORMED HIS CARD HAD BEEN BLOCKED AND SOME TRANSACTIONS HAD GOT THOUGH TO THE VALUE OF THE VICTIMS LOSS £942.74.00. THE TRANSACTIONS THAT WERE BLOCKED

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WERE ALL ROUNDED NUMBERS FROM A COUPLE OF HUNDERED TO A COUPLE OF THOUSAND. THE VICTIM AND I AGREE THAT HIS DRINK WAS SPIKED THE VICTIM WAS NOT FEELING RIGHT FOR A FEW AFTER. THE VICTIM WAS FEEING PARANOID NOT IT FEELING WITHIN HIMSELF. Ref: NRFC161001574264.

1st October 2016 - £1,320.00 was stolen and the victim is making allegations he was drugged. Victim states to ACTION FRAUD 'I WAS AT A GENTLEMAN'S CLUB, LEGS 11 ON BROAD STREET, BIRMINGHAM AND HAVE BEEN FINANCIALLY EXPLOTIED FOR £1,320.00 AFTER HAVING MY DRINK SPIKED. UPON RETURNING TO LONDON I NOTICED A FEW DAYS LATER, ONCE THE TRANSACTIONS HAD GONE THROUGH ON MY DEBIT AND CREDIT CARD THAT THERE HAD BEEN THREE TRANSACTIONS OUT OF MY ACCOUNT TO THIS ESTABLISHMENT. TWO DEBITS FOR £330.00 AND ONE FOR £660.00. I HAD NO RECOLLECTION OF THIS AND HAD NOT DRUNK ENOUGH ALCOHOL TO WARRANT TOTALLY FORGETTING THE PERIOD OF TIME DURING WHICH THESE TRANSACTIONS TOOK PLACE. IT IS ALSO HUGELY OUT OF CHARACTER FOR ME TO BE IN SUCH AN ESTABLISHMENT. I WAS ON A GOLFING TOUR WITH C.12 FRIENDS WHI DECIDED TO GO TO THIS CLUB ON BROAD ST, BIRMINGHAM AGAINST MY BETTER JUDGEMENT. I CALLED UP LEGS 11 20/09 AND SPOKE TO EDIT WHO SAID HE WOULD HAVE A LOOK AT SOME OF THE CCTV FOOTAGE AND GET BACK TO ME. I HADN'T HEARD FROM EDIT BY SEVERAL DAYS LATER DESPITE TRYING 3 MORE TIMES BEFORE HE CALLED ME IN THE EARLY HOURS OF 22/09. EDIT SAID THAT THE £330.00 WAS FOR A PRIVATE DANCE FOR 15 MINUTES WITH TWO GIRLS, WHILE £660 WAS THE SAME WITH THREE GIRLS AND THAT ALL TRANSACTIONS WERE CHIP AND PIN. I TOLD HIM THAT I HAD BEEN FINANCIALLY EXPLOITED BY THE GIRLS AND BELIEVE THAT THE REASON FOR THE COMPLETE LACK OF RECOLLECTION AND UNAWARENESS OF THE TRANSACTIONS WAS BECAUSE I HAD BEEN SPIKED AND THEN, ENCOURAGED, AGAINST MY WISHES, TO PAY FOR THE AMOUNT I DID NOT KNOW WHETHER I HAD BEEN UNDER DURESS OR NOT BUT COULD NOT RULE IT OUT OF THE QUESTION. EDIT COULD/WOULD NOT INFORM ME CLEARLY WHAT HAD HAPPENED FROM THE CCTV FOOTAGE. I INFORMED FIRST BIRMINGHAM POLICE ON 26/09 AND MET POLICE. THE EMBARRASSMENT OF WHAT HAD HAPPENED TO ME AND THE FACT I WOULD HAVE TO EXPLAIN BEING IN A GENTLEMANS CLUB, WAS THE REASON WHY I WANTED TO RESOLVE THE ISSUE WITH LEGS 11 DIRECTLY BEFORE GOING TO THE POLICE. THE LADY FROM 101 BIRMINGHAM I SPOKE TO SAID THAT THIS IS NOT THE FIRST TIME THAT SHE HEARD SOMEONE MAKE A STATEMENT ASBOUT LEGS 11. Ref: NRFC161001571070.

On 20th December 2015 there was a further fraud offence whereby the IP is alleging that a combined value

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of £4,000.00 has been taken from his credit card without his permission in numerous transactions throughout the night. The caller is also alleging that he was drugged whilst the incident took place. Oasis Log 966.

22nd September 2015 - £11,000.00 was stolen and the victim is making allegations he was drugged. Victim stated to ACTION FRAUD 'I VISITED LEGS 11 AFTER DAY 3 AT THE CRICKET - I KNOWINGLY AGREED TO SPEND £1000 TO HAVE A PRIVATE ROOM AND ADDITIONAL £500 THERE AFTER - AT SOME POINTS OF THE EVENING I DID NOT HAVE CLOSE EYE ON MY WALLET AND SOME HAVE USED THREE OF MY CARDS IN MY WALLET TO TAKE MONEY ABOUT FOUR TRANSACTIONS ON MY COMPANY DEBIT CARD TOTALLING £6,000.00 - ONE TRANSACTION ON MY COMPANY CREDIT CARD FOR A FURTHER £2,220 AND JUST YESTERDAY ANOTHER £1,100 HAVE GONE THROUGH MY PERSONAL CREDIT CARD. THERE IS NO WAY I KNOWINGLY AGREED TO SPEND THAT MUCH MONEY - I WAS SOBER ENOUGH TO GET INTO THE CASINO AFTER MIDNIGHT THAT EVENING SO I BELIEVE I ENTERED THE BUILDING IN A REASONABLE CONDITON AND HAVE BEEN DRUGGED / FOOLED / TRICKED MY GUT FEELING IS THAT THEY SAW ME USE MY PIN NUMBER AND THEN JUST PROCESSED AS MANY TRANSACTIONS AS THEY COULD WHILE I WAS NOT PAYING ATTENTION. ON THE SAME NIGHT THERE WAS ANOTHER CHAP SAT NEAR ME IN THE PRIVATE ROOM AND DO RECALL HEARING THE GIRLS LAUGHING THAT THEY HAD DONE HIM FOR £4,000.00 SO FAR - HE DID NOT LOOK LIKE HE WAS IN CONTROL OF THIS EITHER. Ref: NRFC150901181853.

On 6th July 2015 the victim states that he had £1,600.00 taken from 'his account' during the evening and stated that he was with a friend that had £8,000.00 taken although this does not appear to have been reported. Caller states he has no memory from midnight. He stated he had been to the doctors but they stated it was too late to check his body for drugs. Oasis Log: 2145.

14th December 2014 - £4,600.00 stolen from victims account over two nights. Reported to bank. Transactions were showing as made at DANSID BAR going by the name of LEGS 11, 30 LADYWELL WALK, BIRMINGHAM, B5 4ST. Ref: NRFC141200876354.

2nd November 2013 - £2,000.00 was stolen and the victim is making allegations he was drugged. Ref: NRFC131100425538.

Other allegations of theft/fraud made towards the venue are the following:

On 22nd August 2015 £11,000.00 was stolen and the victim is made a report that he was threatened for the money whilst in the club. Upon making the report to ACTION FRAUD the victim stated the following: 'I

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WENT ON A NIGHT OUT IN BIRMINGHAM ON 22/08/15. I ATTENDED A LAP DANCING BAR CALLED LEGS 11. I ARRIVED AT 1-2 AND LEFT AT 4 APPROX. I SPENT 165 ON DANCES FOR ME AND THE STAG. I HAD A GIRL EITHER SIDE OF ME WHEN ENTERING MY PIN. THEY TOLD ME THERE WAS AN ISSUE WITH THE CARD MACHINE AND THE PERSON (CAN'T REMEMBER IF MAN OR WOMAN) HAD THE HAND HELD DEVICE BEHIND THE BAR. THERE WAS A BIT OF COMMOTION WITH THE GIRLS ARGUING OVER HOW TO USE THE MACHINE OR THE MACHINE NOT WORKING PROPERLY AND I COULDN'T HEAR WHAT THEY WERE SAYING BECAUSE THE MUSIC WAS LOUD. THE FIGURES HAVE BEEN RE-ENTERED (SLIGHTLY UNSURE OF THIS). I THOUGHT I WAS ONLY PAYING FOR ME AND THE STAG TO GET A DANCE. I GOT SPLIT FROM THE REST OF THE STAG PARTY. THEY THEN TOOK ME IN A DIFFERENT ROOM (LARGE BACK ROOM) AND BECAME QUITE HOSTILE AFTER DEMANDING MORE MONEY. I ENDED UP PAYING £660 JUST TO APPEASE THEM AND GET OUT OF THERE. WHEN PAYING, ONE OF THE GIRLS TOOK THE HANDHELD TERMINAL AND LEFT FOR 20-30 MINS WHILE I WAS STUCK WITH ANOTHER OF THE TWO GIRLS ALONE. I WAS DEMANDING MY CARD BACK AND EVENTUALLY IT TURNED UP AND THE GIRL SAID IT HAD NOW GONE THROUGH, ONCE I GOT MY CARD I RAN INTO THE MAIN ROOM ASKING A FELLOW CUSTOMER WHERE THE EXIT WAS SO I COULD GET OUT. I THEN RAN OUT OF THE BUILDING. I HEADED BACK TO THE HOTEL WHERE I HAD A DRINK AT THE BAR AND PAID FOR THIS ON MY CARD. I REMOVED ALL THE CARDS FROM MY WALLET TO FIND MY ROOM CARD. UPON LATE CHECKOUT I THROW ALL MY CLOTHES AND CARDS INTO MY SUITCASE. MY BANK CARD SLIPPED THROUGH INTO THE LINER OF THE SUITCASE. I COULDN'T FIND MY CARD SO REPORTED IT LOST. I HAD NO IDEA AT THAT POINT ANY OTHER MONEY HAD BEEN TAKEN WITHOUT MY KNOWLEDGE. I AM CURRENTLY WORKING OFFSHORE MY WIFE HAS JUST OPENED MY BANK STATEMENT AT HOME TO SEE THAT £2,200 HAD BEEN TAKEN FROM MY BANK ON FIVE OCCASSIONS FROM LEGS 11. ITS ABOUT £40 FOR A DANCE IN THERE HOW COULD I OF SPENT THAT MUCH IN SUCH A SHORT SPACE OF TIME'. Ref: NRFC150901170147.

Theft by means unknown allegations:

On 14th March 2017 £12,875.00 was stolen from a victim by means unknown. Ref: NRFC170301778957.

On 4th March 2017 £660.00 was stolen from a victim by means unknown. Ref: NRFC 170301768054.

On 17th December 2016 £19,417.00 was stolen from a victim by means unknown. Three separate reports were made to ACTION FRAUD. The latest was Ref: NRFC161201684620 and the victim stated the following: 'I REPORTED THIS CRIME ON THE 21ST DECEMBER AND WAS GIVEN THE REFERENCE NRFC161201678276. SINCE THEN I HAVE DISCOVERED THAT MORE MONEY WAS TAKEN FROM

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MY ACCOUNT, BUT AS I AM STILL AWAITING A RESPONSE FROM NATWEST I DIDN'T RECEIVE A PASSWORD SO HAVE BEEN UNABLE TO UPDATE MY REPORT. THEREFORE I WOULD LIKE THIS REPORT TO BE INCLUDED WITH MY ORIGINAL ONE. ON SUNDAY I NOTICED THAT MY DRIVERS LICENCE WAS MISSING AND THAT EVENING I RECEIVED A FACEBOOK MESSAGE FROM A WOMAN CALLED [REDACTED] WHO CLAIMS FOUND MY LICENSE ON THE BUS. ON THE EVENING OF FRIDAY 23RD I PHONED LEGS 11 AND ASKED THEM TO EXPLAIN THE PAYMENTS. A MANAGER TOLD ME THAT THEY HAD A POLICY NOT TO USE CONTACTLESS PAYMENTS. HE ALSO SAID THAT FOR ANY PAYMENTS EXCEEDING £1000 THEY NEED A SIGNED DECLARATION FORM AND THAT THEY HAD FIVE OF THESE SIGNED BY MYSELF, AS WELL AS A COPY OF MY DRIVERS LICENSE. THE PAYMENTS THAT THE CLUB CLAIMED TO HAVE FORMS FOR TOTALLED £19,000.00. I ASKED THEM TO KEEP HOLD OF CCTV FOOTAGE, BUT WAS TOLD THAT THE CLUB WOULD ONLY HOLD IT FOR TWENTY EIGHT DAYS AS THIS WAS THE LEGAL REQUIREMENT. THAT EVENING I CHECKED MY ACCOUNT AGAIN AND DISCOVERED THAT A FURTHER £9,900.00 HAD GONE FROM MY ACCOUNT. ON THE 24TH I REPORTED MY LICENSE LOST OR STOLEN AND SENT [REDACTED] A MESSAGE ON FACEBOOK REQUESTING THAT SHE TAKE THE LICENSE TO THE NEAREST POLICE STATION AND THAT WAS THE LAST TIME I HAD CONTACT WITH HER. HER PHONE NUMBER IS [REDACTED]. ON THE EVENING OF TUESDAY 27TH DECEMBER I NOTICE THAT LEGS 11 HAD ALSO ATTEMPTED TO TAKE MONEY FROM MY BARCLAYS ACCOUNT, BUT THERE WERE INSUFFICIENT FUNDS AND THE REQUEST WAS DENIED. I IMMEDIATELY CONTACTED BARCLAYS CUSTOMER SERVICES AND REQUESTED MY ACCOUNT TO BE STOPPED AND ORDERED ANOTHER CARD.' The second report consisted of the following: 'IN MY ORIGINAL REPORT I NOTIFIED YOU THAT MY NATWEST BANK ACCOUNT HAD BEEN TARGETED BY FRAUDSTERS FROM LEGS 11 GENTLEMANS CLUB IN BROAD STREET, BIRMINGHAM. I WOULD ALSO LIKE TO NOTIFY YOU OF AN ATTEMPT TO TAKE MONEY FROM ANOTHER BANK ACCOUNT THAT I HAVE WITH BARCLAYS BANK. I DID NOT DISCOVER THIS UNTIL I HAD SPOKE WITH BARCLAYS CUSTOMER SERVICES ON THE 27TH DECEMBER 2016. THEY EXPLAINED THAT THE CLUB, LEGS 11, HAD ATTEMPTED TO TAKE £13.75 FROM MY ACCOUNT, BUT THAT THERE HAD BEEN INSUFFICIENT FUNDS IN MY ACCOUNT AT THE TIME TO COVER THE PAYMENT, SO IT DIDN'T GO THROUGH. AT NO POINT DURING THE EVENING IN QUESTION, WHILST I WAS AT THE CLUB, DID I USE MY BARCLAYS DEBIT CARD SO THIS IS OBVIOUSLY HIGHLY SUSPICIOUS. THE SAME AMOUNT WAS TAKEN FROM MY NATWEST ACCOUNT BY THE CLUB, ALONG WITH TWO PAYMENTS FOR £22.00, TWO FOR £11.00, ONE FOR £330.00, TWO FOR £2,200.00, ONE FOR £550.00, ONE FOR £880.00 AND FOUR FOR £3,300.00. I WOULD SUGGEST

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THAT MANY OF THESE ARE DUPLICATE PAYMENTS. I WOULD ALSO LIKE TO ADD THAT AS WELL AS BEING CONTACTED BY A STRANGER CALLING HERSELF [REDACTED] ON FACEBOOK, WHO CLAIMED TO HAVE FOUND MY DRIVERS LICENSE ON A BUS (THE CLUB CLAIMS TO HAVE A COPY OF IT AND I NOTIFIED YOU OF THIS FACT IN THE PREVIOUS REPORT), I ALSO RECEIVED A MESSAGE THE SAME DAY FROM ANOTHER PERSON CALLING THEMSELVES [REDACTED] WHO LATER MADE SUSPICIOUS COMMENTS WHICH MADE ME DECIDE TO BLOCK HER. ALSO, YET AGAIN I HAVE RECEIVED A ANOTHER MESSAGE FROM A WOMAN CALLED [REDACTED], WHICH I HAVE SINCE DECLINED. IT STRIKES ME AS VERY SUSPICIOUS THAT ALL THESE INDIVIDUALS ARE CONNECTED TO BIRMINGHAM, WHERE THE CRIME TOOK PLACE.' The first report consisted of the following: 'ON THE EVENING OF SATURDAY THE 17TH DECEMBER (2016) I VISITED LEGS 11 CLUB IN BROAD STREET, WHICH I HAD NOT PREVIOUSLY VISITED. ON ENTERING THE CLUB I WAS APPROACHED BY A DANCER WHO OFFERED ME A DANCE AND EXPLAINED IT WOULD COST £20, INITIALLY I REFUSED AND JUST PAID FOR A DRINK AT THE BAR, AFTER A WHILE I WAS APPROACHED BY ANOTHER DANCER WHO STARTED A CONVERSATION WITH ME THEN ASKED IF I WANTED HER TO DANCE FOR ME WHICH I AGREED TO. I REMEMBER THAT THE BAR TENDER WAS A MIDDLE AGED LADY, SHE ASKED IF I WAS OK TO USE THE CHIP AND PIN WHICH I AGREED TO, I ALSO RECALL ASKING THE DANCER HOW MUCH THE DANCE WOULD COST AND WAS TOLD £20. I STAYED AT THE CLUB FOR A NUMBER OF HOURS AND IN THAT TIME AS FAR AS I WAS AWARE, I ONLY PAID FOR TWO £20 DANCES AND DRINKS, JUST PINTS OF SAN MIGUEL, FOR MYSELF THROUGHOUT THE NIGHT. I RECALL THAT SOME OF THE DANCERS TOLD THAT "VIP" DANCES WERE AVAILABLE WHICH LASTED MUCH LONGER THAN USUAL AND INCLUDED A FREE BOTTLE OF CHAMPAGNE, BUT I EXPLAINED THAT I WAS NOT INTERESTED IN THIS. AT NO TIME DID I RECEIVE ANY FREE BOTTLE OF CHAMPAGNE OR DANCES THAT LASTED LONGER THAN 5-10 MINUTES. I LEFT THE CLUB IN THE EARLY HOURS OF THE MORNING AND WHILST I WAS DRUNK I WAS STILL ABLE TO REMEMBER EVERYTHING THAT HAD HAPPENED AND MAKE MY OWN WAY HOME. THE FOLLOWING MORNING I DISCOVERED THAT NEARLY £10,000.00 HAD BEEN TAKEN OUT OF MY ACCOUNT IN SEPARATE PAYMENTS RANGING FROM £11.00 TO £3,300.00.

On 6th February 2016 £4,992.00 was stolen from a victim by means unknown. Ref: NRFC160301357122.

On 3rd December 2015 a sum of £330.00 was stolen from a victim. ACTION FRAUD states: 'A SUM OF £330.00 WERE TAKEN FROM THE VICTIM'S ACCOUNT. THE VICTIM PAID FOR DRINKS AND AFTER REALISED THAT HE WAS BEING CHARGED ABOUT £310 MORE THAN HE SHOULD HAVE. THE

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VICTIM WENT BACK TO THE NIGHTCLUB, HE GAVE THE RECEIPT TO ONE OF THE STAFF WHO ADVISED HE WOULD GET IT SORTED, HE WENT AWAY WITH THE RECEIPT AND THEN CAME BACK AND TOLD THE VICTIM THAT HE DIDN'T KNOW WHAT THIS WAS ABOUT AND AT THAT POINT THE RECEIPT HAD BEEN TAKEN BY THE STAFF MEMBER. THE VICTIM WAS EJECTED FROM THE NIGHTCLUB FOR COMPLAINING. Ref: NRFC151201252195.

On 28th November 2015 £310.00 was stolen from a victim by means unknown. Ref: NRFC151201252195.

On 30th December 2014 £4,600.00 was stolen from a victim by means unknown. Ref: NRFC141200876354.

On 17th November 2013 £3,300.00 was stolen from a victim who had lost his card as part of a separate assault. The card was then used in this club Ref: NRFC131100444019.

On 31st August 2013 £3,005.00 was stolen from a victim. Report via ACTION FRAUD states: VICTIM VISITED BIRMINGHAM FRI EVENING. 30/08/13. ON RETURNING HOME, VICTIM DISCOVERED HIS CREDIT CARD WAS MISSING. £3,005.00 WAS ATTEMPTED ON THE CARD. BANK HAVE FROZEN THE PAYMENTS, ADVISED TO REPORT TO THE POLICE. ONE LOCATION OF THE FRAUD WAS £3,005.00 AT LEGS 11 STRIP CLUB, BROAD STREET, BIRMINGHAM, VICTIM ATTENDED THIS CLUB AT 2AM 31.08.13.. Ref: NRFC130900360497.

On 15th June 2013 £330.00 was stolen from a victim by means unknown. Ref: NRFC130700301132.

On 8th March 2013 £282.70 was stolen from a victim by means unknown. Ref: NRFC130400203688.

Incidents recorded on Police Oasis Logs:

There is to date 223 incidents reported with the address being LEGS 11 193 194, BROAD STREET, CITY CENTRE-BIRMINGHAM-WEST MIDLANDS. I am now going to list the incidents that have been reported from 4th June 2017 to 26th December 2016.

4th June 2017 - Assault Section 47 - Security Staff vs IP. Modus Operandi as follows: 'BETWEEN TIMES (0200 – 0230hrs 04/06/2017) UNKNOWN OFFENDER WHO IS DOOR STAFF AT LOCATION HAS EJECTED IP FOR SPILLING A DRINK, OFFENDER HAS GRABBED IP AROUND FRONT OF THROAT, ONCE OUTSIDE ANOTHER UNKNOWN OFFENDER HAS PUNCHED IP TWICE TO SIDE OF FACE AND THROWN HIM TO THE GROUND'. Crime Reference number: 20BW/117250E/17

3rd June 2017 - Assault Section 20 - Security Staff vs IP. Modus Operandi as follows: 'AT THAT TIME (0340 – 0345hrs 03/06/2017) HE STATED HE WAS ASSAULTED BY 3 BOUNCERS IN THE TOILETS AT THE LEGS 11 CLUB ON BROAD STREET AND ATTENDING OFFICER NOTED A BLOODY NOSE.

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AMBO REFUSED BY I/P. Oasis Logs 465 & 461 refer. Crime Reference number: 20BW/116650V/17.

28th May 2017 - Fraud - £600.00 stolen from IP 1, £1000 stolen from IP 2. Both victims alleging they were drugged. Victims' money stolen via credit card. On Oasis Log 1530 father of one of the victims' states his son's pupils are dilated and he appears under the influence of drugs. Wallet was also missing and IP cannot remember getting home.

24th May 2017 - Fraud - £4,600.00 stolen from IP on credit card. Victim alleging he was drugged. Oasis log 1211.

07th May 2017 - Fraud - unknown amount, IP states they have had a large amount of cash stolen from their credit card. Oasis Log 1319 refers.

29th April 2017 - Assault Section 47. Security Staff vs IP. IP states two weeks on (17/05/2017) he is still suffering from the assault, has pain in his back and elbow and wishes to make a complaint. Modus Operandi as follows: 'BMT (0525 – 0535hrs 29/04/2017) IP ATTENDED LOCATION FOR A DRINK AND WHILE INSIDE HAS BEEN TAPPED ON THE BACK OF HIS HEAD BY A DANCER IP RETALIATED AND WAS SUBSEQUENTLY THROWN OUT BY DOOR STAFF WHO THEN PUNCHED THE IP SEVERAL TIMES KICKING HIM IN HIS BACK CAUSING HIM TO FALL FACE DOWN INTO THE STREET BREAKING HIS ARMARNI WATCH AND LOSE HIS ARMARNI CHAIN AND IP HAS BEEN LEFT WITH CUT TO LEFT EAR BRUISING TO THE BACK OF HIS HEAD BACK PAIN AND STIFFNESS IN ARM AND ELBOW. HE WAS THEN CHASED AWAY BY DOOR STAFF'. Crime Ref: 20BW/103102A/17.

18th April 2017 - Fraud - IP alleges he was drugged and £4,730.00 was stolen from his card. Oasis Log 1155 refers.

11th April 2017 - Assault Section 47 - Security Staff vs IP.

Modus Operandi as follows: 'BMT (2330 – 2340hrs 10/04/2017) THE IP AND FRIEND HAVE ENTERED STRIP CLUB WHERE THEY HAVE BEEN HAVING A DRINK AT THE BAR. THE IP HAS BECOME ROWDY AND HE HAS BEEN ASKED TO LEAVE BY THE MANAGER. THE MANAGER HAS FELT INTIMIDATED BY THE IP SO HAS GRABBED HIM TRIED TO PUSH HIM, AT WHICH POINT ANOTHER CUSTOMER, A FRIEND OF THE MANAGER HAS JUMPED IN AND PUNCHED AND KICKED THE IP TO THE HEAD AND HAS ALSO TURNED AND PUNCHED THE IPS FRIEND. IP SUFFERED SWOLLEN AND BRUISED RIGHT EYE AND ABRASIONS TO RIGHT AND LEFT WRIST. POLICE CONTACTED. OFFENDER HAS LEFT SCENE PRIOR TO POLICE ARRIVAL'. Crime Ref: 20BW/74156L/17.

Modus Operandi as follows: 'IP WAS STANDING AT THE BAR WITH HIS FRIEND (2330 – 2340hrs 10/04/2017). FRIEND BECAME INVOLVED IN AN ALTERCATION WITH MANAGER. IP INTERVENED

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AND WAS PUNCHED ONCE TO THE FACE BY A FRIEND OF THE MANAGER, KNOCKING HIM TO THE FLOOR AND CAUSING TOP FRONT TOOTH TO BREAK. POLICE CONTACTED. OFFENDER LEFT SCENE PRIOR TO POLICE ARRIVAL'. Crime Ref: 20BW/74157P/17.

9th April 2017 - Assault Section 47 - Security Staff vs IP. The IP reported he had a cut above his left eye that required stitches, grazing to left side of his face and forehead. Modus Operandi as follows: 'IP HAS BEEN REFUSED ENTRY INTO ESTABLISHMENT (2355hrs 08/04/2017 – 0001hrs 09/04/2017). FOLLOWING DEBATE WITH DOOR STAFF ABOUT WHY ENTRY WAS REFUSED THE IP WAS SURROUNDED BY SIX UNKNOWN MALES MAKING THREATS TOWARDS HIM. IP WAS PUNCHED TWICE TO FACE CAUSING HIM TO TUMBLE AND THEN KICKED TO REAR OF HEAD/NECK AREA, THE ASSAULT CAUSED A CUT TO THE LEFT EYE, GRAZES AND CONCUSSION'. Crime Ref: 20BW/73949D/17. Oasis Log 488 refers.

13th March 2017 - Assault Section 47 - Security Staff vs IP. IP reporting he has a broken nose. Oasis Log 188 refers.

13th March 2017 - Disorder between Security Staff & IP. Oasis Log 188 refers.

11th March 2017 - Assault Section 47 - Security Staff & IP. Both IP's have bruising to both cheeks and bleeding from nose. Oasis Log 255.

17th February 2017 - Assault Section 47 - Security Staff vs IP. Oasis Log 16 refers.

4th February 2017 - Assault Section 47 - Security Staff vs IP. Oasis Log 460 refers.

4th February 2017 - Assault Section 47 - Security Staff vs IP. Oasis Log 436 refers.

28th January 2017 - Assault Section 47 - Security Staff vs IP. Oasis Log 487 refers.

26th December 2016 - Fraud - IP alleges he was drugged and £1,100.00 was taken from his credit card. He was also assaulted. Modus Operandi as follows: 'IP DUE TO HIS BEHAVIOUR WAS DETAINED BY SECURITY AT THE LOCATION (GROSVENOR CASIO, BROAD STREET), POLICE ATTENDED & SUBSEQUENTLY ARRESTED THE IP FOR POSSESSION OF A CONTROLLED DRUG & POSSIBLE ASSAULT AGAINST THE SECURITY. IP NOW DISCLOSES HE WAS ASSAULTED HIMSELF BY SECURITY, HOWEVER HE HAS NO RECOLLECTION OF WHAT HAPPENED'. Times of offence (2300hrs 23/12/2016 – 0100hrs 24/12/2016) Crime Ref: 20BW/256852A/16.

Further explanation to this incident is found on the Investigation Log: 'THE IP WENT OUT ON FRIDAY 23RD DECEMBER TO THE BRASSHOUSE IN BROAD STREET AT AROUND 2300HRS HE ENDED UP, AT LEGS ELEVEN WHERE HE WAS TAKEN TO A ROOM BY WHAT HE DESCRIBES AS A SMALL

Signature

Signature witnessed by

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OFFICIAL – (when complete)

MG11

Crime No.

URN

Statement of Mark Phillip Bates

EASTERN EUROPEAN WOMAN AGED ABOUT 25 IN A GOLD DRESS MAYBE A TWO PIECE WITH LONG BLONDE HAIR SHE WAS ONLY ABOUT 5 FOOT TALL. HE CLAIMS THAT WHILST HE WAS WITH HER SOMEHOW £1265 WAS TAKEN FROM HIS BANK ACCOUNT WHICH HE IS NOT ABLE TO EXPLAIN. IP ALSO STATED THAT HE CANNOT REMEMBER ANYTHING FROM THE POINT OF PURCHASING A DRINK IN LEGS ELEVEN. HE HAS CONFIRMED THAT THE TWO CARD TRANSACTION WERE CHIP AND PIN AND MADE AT LEGS ELEVEN ATTACHED BANK STATEMENT CONFIRMS THIS'.

The above chronology of events demonstrates a disturbing pattern of serious criminal behaviour at Legs 11 and a clear lack of any effective management to protect public safety, and prevent crime and disorder. The paying and general public are at a clear risk of exploitation and assault at the venue. I believe there is a genuine risk to the public from Legs 11 and as such complete this statement with my findings.

Signature

Signature witnessed by

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WITNESS STATEMENT

Criminal Procedure Rules, r 27.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B

Crime No. URN

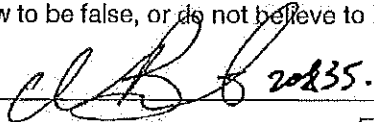
Statement of Mark Phillip Bates

Age if under 18 O'18 (if over 18 insert "over 18")

Occupation Detective Constable 20835

This statement (consisting of 2 page(s) 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 in it anything which I know to be false, or do not believe to be true.

Signature:



(witness)

Date 29/06/2017

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

I am DC 20835 BATES of the West Midlands Police currently attached to the Serious and Organised Crime - Prevent Team.

In addition to my statement dated 19th June 2017 I have the following to add.

West Midlands Police Intelligence Systems have been interrogated and I can state the following:

8th August 2016 intelligence graded B21 has been received to state Daniel PARMA ~~REDACTED~~ killed someone in Albania and due to this revenge attacks were launched against PARMA's family in which seven members of his family were killed. PARMA then fled to the UK.

19th June 2016 intelligence graded B41 has been received to state Daniel PARMA ~~REDACTED~~ is linked to the trafficking of women from Eastern Europe with the intention of them working in the two Legs 11 clubs in Birmingham that are operating as lap-dancing clubs and brothels. PARMA is running brothels around the UK. PARMA will use Firearms to facilitate his criminality.

10th February 2011 PARMA was stopped by Police in a vehicle with two Eastern European females. The females admitted they worked in 'BUNNIES' massage parlour but refused Police assistance.

PARMA owns and is in control of a number of companies:

Mr Daniel Parma

30 Ladywell Walk, Birmingham, B5 4ST

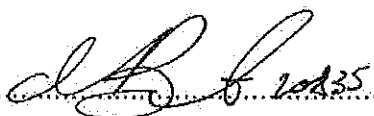
Nationality

United Kingdom

Date Of Birth

~~REDACTED~~

Signature



Signature witnessed by

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(27)

OFFICIAL – (when complete)

MG11

Crime No.

URN

Statement of Mark Phillip Bates

1. Dansid Limited

Company Number: 08295260 Active Director Current 15th Nov 2012

2. Legs 11 Europe LTD

Company Number: 09758460 Active (New) Director Current 2nd Sep 2015

3. Take It Back Limited

Company Number: 08048966 Active Director Current 27th Apr 2012.

The above information was obtained using police systems.



Signature

Signature witnessed by

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WITNESS STATEMENT**Criminal Procedure Rules, r 27.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B**Crime No. URN

Statement of Abdool Rohomon

Age If under 18 (if over 18 insert "over 18")

Occupation Police Officer

This statement (consisting of 4 page(s) 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 in it anything which I know to be false, or do not believe to be true.

Signature: A.Rohomon (witness)

Date 6/7/17

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

I am the above named person, currently a serving Police Officer with West Midlands Police, based in Birmingham City Centre, where I have served all of my Police career. I am a Police Licensing officer, having been in this role for the last 15 years. I have qualifications as a risk assessor and risk management, science of people movement and inspection of licensed premises. I also sit on the NPCC licensing sub-group which is a select group of individuals from across the country with high level of knowledge in Licensing.

This statement is in relation to a premises called Legs 11, with the address of 193-194 Broad Street, Birmingham, B15 1AY. These premises are a lap dancing club, they benefit from a premise licence issued under the Licensing act 2003 - licence number 1634, and a Sexual Entertainment Venue licence (SEV) issued under Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982.

The premise licence is held by a company called "Clear Blue Sky limited" with the DPS being Mr Edmond Haxhia. Clear Blue Sky limited is a company that is owned by a Sidney Taylor and a Thomas Taylor who are both shown to be living at a same address in Birmingham. The premise licence was transfered into "Clear Blue Sky limited" on the 9th Dec 2010.

The SEV licence is also held by "Clear Blue Sky Limited", the SEV was renewed at the end of October 2016, this application shows the management of the premises being the responsibility of Mr Sidney John Taylor and Mr Thomas Winston Taylor, both are shown as directors of the company and Mr Edmond Haxhia as the manager of the premises.

At the start of 2017, Birmingham Licensing Department became aware of concerns with Legs 11 - Broad Street, around the volume of financial transactions that were being reported by individuals as having been made fraudulently, and without their knowledge.

West Midlands Police had started to conduct intelligence reports into these premises which also showed concerns that the premises was being run and managed by members of an Albanian Organised Crime

Signature 

Signature witnessed by

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Crime No. URN

Statement of Abdool Rohomon

Group, and the premises were being used for serious criminality. This was being used to determine a plan of action to take against the premises.

After the 17th April 2017 West Midlands Police were informed that covert officers from Birmingham City Council had conducted a test purchase in these premises, during this operation officers had been offered additional sexual services. West Midlands Police were provided by Birmingham City Council a copy of the CCTV for the trading night of the 17th April 2017, this CCTV had been obtained from the premises.

I am aware that there are rules on how SEV premises should operate that are conditioned with the SEV licence and that there will also be "club" rules that the premises will write and should abide by, some of the conditions/rules relate to touching both on the part of the dancer and then the recipient.

I have viewed this CCTV several times, at 03.33 hours the CCTV shows a male entering a room with two females. The CCTV shows for a period of over an hour of the dancers touching the male, sitting on him, sitting on his face, stroking his penis with their feet, stroking his chest underneath his t-shirt, taking his belt off, and putting it around his neck, using it to whip his body and his genital area, blind folding him with their stockings and belt. The male is plied with alcohol whilst in the room and on more than one occasion he looks and shows signs that he is not with it, either through drink or drugs. He appears sleepy and lethargic.

The actions that I have seen in this CCTV footage I believe contravene both the conditions of licence around touching and the club rules around the same issue

On the 23rd June I was present during a Police instigated operation against Legs 11 Broad Street. West Midlands Police prevent team had been granted 2 warrants to execute against the premises. As the Licensing Officer from West Midlands Police I was in company with officers from Birmingham City Council licensing and Birmingham City Council Trading Standards. There were numerous other officers and staff from both the Police and other outside agencies.

During the course of the night I was with 2 officers from the City Council licensing and we inspected the premises, during the course of this inspection the officers from the licensing department seized the following items,

a card showing a touting tally this was found under the cash register by the front door (ex CJM1)(ref)

an envelope with promotional fliers in them (ex CJM2)(ref)

a taxi promotion card (ex CJM3)(ref)

a laminate sheet of offers by Daniel Parma (ex CJM4)(ref)

£30 in cash found in envelope (ex CJM 5)(ref)

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MG11

Crime No.

URN

Statement of Abdool Rohomon

2 x legs 11 cards (ex CJM 6)(ref)
6 pages of dancer details (ex CJM 7)(ref)
Active register (ex CJM8)(ref)
Register of individuals (ex CJM9)(ref)
Bar signing in and out sheet (ex CJM 10)(ref)
8 bank cards and 2 driving licenses (ex CJM 11)(ref)
VIP members guest list (ex CJM 12)(ref)
copies of ID's and transaction (ex CJM 13)(ref)
transaction details for a Fraser Raymond (ex CJM14)(ref)

During the course of the warrants I am aware that officers seized CCTV, paperwork, cash, phones and numerous other items.

Since the execution of the warrant West Midlands Police issued an application under Sec 53a of the Licensing Act , for a summary expedited review. This was done on the grounds that the premises was associated with serious criminal offences, this was in regard to Fraud offences and the association of the premises with Organised Crime Groups. I can produce a copy of the application and the certificate that was signed by a senior officer from West Midlands Police (ex AR1)(ref).

The application outlines the concerns of West Midlands Police, in relation to the Fraud offences, it documents that since 2013 there have been 17 reported offences (to action fraud) totalling £93,042.44p. The amounts vary from the smallest being £282.70p to the highest being £19,417.00.

The concern around the premises being associated and run by organised crime groups has come from both intelligence and financial transactions at the premises. The PDQ machines (where people pay by card) pays to a company called "Take it back limited", this is a Private limited company incorporated in 2012 with the address the same as the address for Legs 11.

The sole director of the company is a male called Daniel Parma. Neither "Take it back limited" or "Daniel Parma" appear on the Premises licence or the SEV licence. It is clear to West Midlands Police that Daniel Parma is the main person behind these premises, money paid by customers is paid into a compnay he is the sole driector of. During the warrant Daniel Parma turned up after officers had secured the premises, it now appears from information I have received that Parma even had the key to the safe on him and not Edmond Haxhia - who was on the premises at the time the warrant was executed.

Signature 

Signature witnessed by

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Crime No. URN

Statement of Abdool Rohomon

From intelligence West Midlands Police are aware that approximately £1.6 million pounds has been paid in card transactions since January 2017, into "Take it back limited".

I have seen e-mails since the warrant was executed from a firm of solicitors to West Midlands Police who report to have Danial Parma as their client. In these e-mails and letters they are asking for items back including the card machines which are important for their client to continue to trade.

On all the evidence before us West Midlands Police believe that the premises is clearly being run by Daniel Parma and that the companies and directors listed on both the premise licence and the SEV licence are just a front, to allow Parma to conduct his activities.

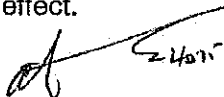
From intelligence Parma has links to serious organised crime groups from Albania, which is a clear concern for West Midlands Police especially as these relate to firearm offences, money laundering, and the illegal trafficking of women from Eastern Europe into Britain, many of whom are then put to work at establishments like Legs 11.

On the back of this application the licensing authority imposed interim steps and immediately suspended the premise licence.

I have since started to watch the CCTV which was seized from the premises, although I have only managed to watch one day, I have found further footage of a male in a room who appears to be either drunk or drugged as his head keeps dropping from side to side, and there are two girls in the room with him, the girls are explicitly touching the male and it can be seen that the male is touching the females.

This is the pattern of events that most if not all of the people that have reported offences to Action Fraud claim has happened to them and that they are totally unaware of what has happened to them, and them to find that large amounts of cash have been taken from their bank accounts.

Legs 11 is clearly not operating within the rules the conditions of the SEV licence and also its own club rules, tied with the evidence that the company listed as the licence holders is just a front to allow organised crime groups to operate the premises and take money from it, West Midlands Police recommend that the SEV licence be revoked with immediate effect.



Signature

Signature witnessed by

03/2016

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WITNESS STATEMENT

Criminal Procedure Rules, r 27.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B

Crime No. URN

Statement of Abdool Rohomon

Age if under 18 +18 (if over 18 insert "over 18")

Occupation Police Officer

This statement (consisting of 5 page(s) 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 in it anything which I know to be false, or do not believe to be true.

Signature:

(witness)

Date 25/7/17

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

I am the above named person, currently a serving Police Officer within West Midlands Police. For the last 15 years of my 26 year service I have been a Licensing Officer based within Birmingham City Centre.

This statement is in relation to Legs 11 - Broad Street, and is an addition to the ones I have already made.

Legs 11, is a lap dancing venue located on Broad Street, Birmingham City Centre. It is a relatively small venue, with a main bar area, where the girls dance on a stage, there are several dancing booths located around the venue and a VIP section on an upper floor.

The premise benefits from two different licenses, the first is a premise licence issued under the Licensing Act 2003 and the second is a Sexual Entertainment licence issued under Schedule 3 of the Local Government (Miscellaneous Provisions) Act 1982.

On the 23rd June 2017 West Midlands Police executed two warrants at Legs 11 – Broad Street. During the execution of these warrants the CCTV hard drives were taken from the premises. There were 3 hard drives that were seized, exhibit numbers DWP/0033/240617, DWP/0037/240617 and DWP/0044/240617.

These hard drives were cloned by West Midlands Police

DWP/0033/240617 to 56952/1046/280617 WC

DWP/0037/240617 to 56952/0838/010717 WC

DWP/0044/240617 to 56952/0820/020717 WC

Due to the time constraints I have only been able to partially view one hard drive (DWP/0033/240617 to 56952/1046/280617 WC). On this hard drive there are 16 cameras which are located as follows

Camera 1 – Bar

Camera 2 – DJ

Signature

Signature witnessed by

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Crime No. URN

Statement of Abdool Rohomon

Camera 3 – DJ

Camera 4 – Bar

Camera 5 – DJ

Camera 6 – Bar

Camera 7 – Kitchen

Camera 8 – Stage/Performance area

Camera 9 – Room

Camera 10 – Room

Camera 11 – Room

Camera 12 – VIP room

Camera 13 – Room

Camera 14 – Fire exit stairs

Camera 15 – Dark room

Camera 16 – Room

I have viewed the CCTV from a selection of cameras, 1, 9, 10, 11, 12, 13, 16.

I have only been able to watch a selection of dates, 2nd June, 3rd June, 4th June and the 10th June 2017. What is clear from the limited CCTV that I have viewed is that it is common practice for touching to happen between the dancers and the customers, the touching does vary, from dancers sitting on customers legs, laps, dancers touching their own lower genital area, even to them inserting their fingers into their vaginas and then putting their fingers into the mouths of customers, and the dancers putting boobs and nipples into the customer faces.

Male customer, routinely touch girls all over the body, except the lower genital area, one piece of footage shows a mouth to mouth kiss between dancer and customer.

From the footage I have seen there is only a couple of dances that do not involve any touching, all the rest do have touching to varying degrees as described above.

Another common theme throughout is the consumption of alcohol, customers are encouraged to drink what appears to be alcohol; sometimes from bottles (whether they are wine/champagne is difficult to tell).

Signature

Signature witnessed by

03/2016

OFFICIAL – (when complete)

Crime No. URN

Statement of Abdool Rohomon

In relation to the CCTV, the following clips have been copied and are being produced by West Midlands Police as evidence of the level of drunkenness, the breaches in the conditions of the SEV licence, the unauthorised sales of alcohol.

There are 7 clips produced in the following order

1. Camera 13 – 03/06/17 between 03:47 to 04:25
2. Camera 13 – 02/06/17 between 04:47 to 04:52
3. Camera 9 – 02/06/17 between 03:08 to 03:40
4. Camera 13 – 04/06/17 between 00:10 to 00:20
5. Camera 1 – 04/06/17 between 04:57 to 05:01
6. Camera 9 – 04/06/17 between 04:07 to 04:16
7. Camera 16 – 10/6/17 between 03:00 to 03:01

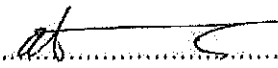
1. This clip shows one male and a female dancer, initially the dancer is sitting on and then over the legs of the customer and there are several minutes of talking. At around 03:51 hours the male appears to suck the breast and nipple of the dancer, and has his hands over the dancers body. At around 03.54 it can be noted that the male customer appears to be either very drunk or under the influence of another substance. He goes floppy and appears lethargic whilst sitting down, this continues in vary stages throughout this clip.

The complaints that have been received have a common thread that the customers cannot recall what has happened to them when they have been in the premises, either through drink or other unknown substances. As the complaints often take months to filter into the Police system there is never any CCTV to corroborate these claims. This CCTV footage does show how drunk people get, or allowed to get and even encouraged whilst in the premises.

2. This clip shows the drinking culture in the premises, a male that is in the room is encouraged to drink what appears to be champagne from a glass and then also direct from the bottle.

3. This clip shows a male and one female dancer. The dancer is seen to stroke the males' penis through his trousers with her hand in a way that appears to be a stimulation movement. The dancer is seen to be gyrating on the customers lap. At around 03:32 hours the female dancer appears to touch her genital area with her fingers in a manner that can only be described as self-pleasuring.

4. This clip shows a male customer entering with a female dancer, at approximately 00:16 hours the male is seen kissing the female dancer full on the lips.

Signature 

Signature witnessed by

03/2016

Crime No. URN

Statement of Abdool Rohomon

5. This clip is from the bar area, it has to be noted that the bar is still open, the licensing hours that are stipulated on the premise licence indicate that they have a 24 hour authority for the sale of alcohol, however in the operating conditions, the third general conditions states "that the premises will have a standard operating hour of 4am....., if the premises wish to operate past 4am for any licensable activity then the designated premises supervisor must inform Steelhouse lane Licensing department, in writing, specifying the date, type of event, and the proposed finishing time..... 28 days for a risk event, 14 for a sporting event and 7 days for a non risk event (or at any other time agreeable.....). West Midlands Police have no record, written or otherwise indicating that they intended to do licensable activity past 4am.

This clip also shows a male at the bar with a dancer, he again appears to be either drunk or under the influence of other substances, he is constantly swaying and doing exaggerated movements. There is also a member of bar staff with a card machine, there seems to be some discussion around a payment, and then the male hands over his card. When the payment goes through the male high 5's the member of bar staff, and then after the male has left the dancer also high 5's the member of bar staff.


6. This clip is from a dance room, it shows a male customer and also a female dancer. The male again appears to be either drunk or under the influence of other substances, I come to this conclusion from his demeanour that I have seen on the CCTV. There is a lot of contact between the dancer and the customer including kissing. At some point the males belt is removed, the female dancer then uses the belt to both whip herself and also the male customer. At the end of the dance the male stands up and fumbles around putting his belt back on, and it can be seen that he cannot do it properly as he tucks his shirt under the belt. This to me is further evidence to show that this male customer is either drunk or under the influence of other unknown substances.

7. This clip, shows a male with a dancer, again the male appears to be very drunk or under the influence of another unknown substance.

All these clips show the patterns of behaviour that have been documented in previous statement and recorded in the "Action Fraud" reports, this to me shows that this behaviour is the accepted normality in these premises, done in an effort to get as much money from people as possible.

I have also spoken to another witness, who was been very candid with me around events that happened to him and a party of friends and relatives that visited the venue on the 3rd March 2017. Whilst I am waiting for this statement the witness is happy for the details to be known around this visit.

On the 3rd March the witness attended the venue with friends and relatives as it was the witnesses "Stag weekend". The witness has been to this type of premise before and so is aware of the nature of the

Signature 

Signature witnessed by

03/2016

Crime No. URN

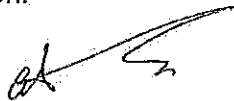
Statement of Abdool Rohomon

business and that girls would be dancing for them. The witnesses stated that whilst in the premises he lost all recollection of what was happening, other than he was in rooms at the premises. The witness states that at some point in the night he was aware his debit card had been maxed out and that they were being presented with a bill that was then paid for by a friend as it was for £2,700. After they left it further transpired that over £9,000 had been taken from his friends' card. The witness was very candid with me and stated that in his youth he had taken recreational drugs and so was aware of the effects that drugs had on him. The witnesses states that he believed he had an unknown substance in him, so decided to get a home testing kit, which showed him to have Methadone in his system. The witness is adamant that he didn't willingly take anything and that the rest of his party were well aware not to take in any controlled drugs and the witnesses Father and uncle were in the group.

With the other information contained in my statement and statements from other officers and witnesses it is clear that these premises have been involved in serious criminality, they are being run and managed by organised crime groups, they are exploiting individuals by either getting them drunk or under the influence of other substances all for the purposed of getting money from them.

Section 11.27 of the Section 182 Guidance details offenses which are deemed serious within the Licensing Act 2003, one of the reasons listed as being serious is if the premises is being used as a base for organised criminal activity, especially gangs. It is the believe on all the evidence shown that these premises are being used for organised criminal activity , especially gangs.

West Midlands Police believe that the only option available to the licensing committee is revocation of the premise licence and that the interim steps of suspension also need to remain in place until any appeal process has been undertaken.



Signature

Signature witnessed by

03/2016

WITNESS STATEMENT**Criminal Procedure Rules, r 27.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B**Crime No. URN

Statement of Abdool Rohomon

Age if under 18 +18 (if over 18 insert "over 18")

Occupation Police Officer

This statement (consisting of 2 page(s) 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 in it anything which I know to be false, or do not believe to be true.

Signature:

(witness)  4075

Date 26/7/17

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

I am the above named person, this statement is in relation to intelligence reports that I have seen that relates to Legs 11, 193-194 Broad Street, Birmingham City Centre.

Intel log created 9th Feb 2017 states - officers were on patrol on the 4th February 2017, around a male handing out business cards, when questioned he stated he was from Greece, but officers did not believe his story, and when he was asked if the spelling of the place where he claimed to have been born in Greece was correct he claimed he could not read English. Officers suspected he was from Albania. This report is graded B/1/1.

Intel log created 6th Dec 2016 states - Albanian illegal immigrants at working at Legs 11, Broad Street. They are working as street promoters, dancers and also made to work in back rooms at the premises. This report is graded E/2/1

Intel log created 25th Nov 2016 states - Legs 11 Broad Street are employing girls from Europe and not paying Tax, and are soliciting outside the premises. They are drugging customers and chraging their cards. This report is graded E/2/1.

Intel log created 8th Aug 2016 states - Sidney Taylor whilst drunk approximately 2 years ago signed over the running of Legs 11 to two men. It is now run under the company name of "Take it back ltd", with the sole director of the business being Daniel Parma. This company is listed as having "small company exemption" and therefore pay no VAT. This report is graded B/2/1

On the same log - it is suggested that "Daniel" killed someone in Albania, in retaliation members of the deceased family killed members of Daniels family. Daniel and his father then fled to the UK claiming asylum. This report is graded B/2/1.

Intel log created 19th June 2016 - Daniel Parma and Klodian Lekstaka are involved in the trafficking of females from Eastern Europe and being trafficked to work at Legs 11. Parma and Lekstaka are bilogical

Signature  4075

Signature witnessed by

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MG11

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URN

Statement of Abdool Rohomon

brothers and will use firearms and /or violence to facilitate their criminality. Parma and Lekstaka are clearly linked to other Albanian nominals and linked to a wide variety of criminality. This is graded as B/2/1.

The grading system is as follows -

A = always reliable

B = mostly reliable

C = sometime reliable

D = unreliable

E = untested source

1 - known to be true without reservation

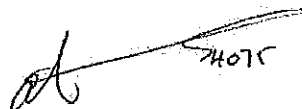
2 - known personally to the source but not the person reporting

3 - not known personally to the source but corroborated

4 - cannot be judged

5 - suspected to be false

The intelligence described within the statement falls into the B&E category and the 1&2 grouping.

 4075

Signature  4075

Signature witnessed by

03/2016

OFFICIAL – (when complete)

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Birmingham City Council

STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Statement of **John PRESTON**

Age if under 18 **Over 18**(if over 18 insert over 18) Sheet No. 1

Occupation **Accredited Financial Investigator**

This statement, consisting of 18 page(s) 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 in it anything which I know to be false or do not believe to be true.

Date: **17th April 2017**

Signed:

I am employed by Birmingham City Council's Trading Standards Service as an Accredited Financial Investigator. I am an authorised officer for the purposes of the Consumer Rights Act 2015.

I make this statement with regards to a test purchase / compliance exercise I conducted at the request of Birmingham City Council's Licensing Enforcement Service on Saturday 15th April 2017, to ascertain compliance with various licensing conditions at adult entertainment club LEGS 11, 193-194 BROAD STREET, BIRMINGHAM, B15 1AY. Complaints had also been received in relation to possible overcharging, which may constitute offences under the Consumer Protection from Unfair Trading Regulations 2008. I conducted the exercise in company with Trading Standards Enforcement Officer Mohammed TARIQ.

I encountered 5 particular individuals involved with the LEGS 11 club during the exercise. Those individuals were as follows:

Signed..... Signature witnessed by

Birmingham City Council

STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation of statement of: **John PRESTON**

Sheet No. 2

A male Door Supervisor. He was approximately 40 years of age and was over 6' tall. He had jet black hair, slicked back, with a receding hair line. He was white with a tanned complexion and a foreign accent. I would say he was of Eastern European origin. He wore a long black coat and had an SIA badge strapped to his upper arm. I will refer to him as 'THE DOOR SUPERVISOR'.

Two males touting for business. The first male told us that his name was 'DANNY'. He was mid-to-late-thirties and around the same height as Officer TARIQ at approximately 5'7" tall. He had short black hair and a short black beard. He was wearing a khaki coloured jacket, black jeans and green / grey coloured trainers. He had a foreign sounding accent and a Mediterranean / olive-skinned complexion. I would say he was Eastern European, possibly Romanian origin. Officer TARIQ enquired as to where he was from but he would not commit to anything, instead just explaining that he had lived in London for a while. I will refer to him as 'DANNY'.

The second male touting for business was of much lighter complexion than DANNY and had short, light coloured hair. He was around the same height as DANNY. He wore a dark coloured bomber jacket. I wasn't able to hear him speaking very well but would say that he too had a foreign accent, but was

Signed..... Signature witnessed by

Birmingham City Council

STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation of statement of: **John PRESTON**

Sheet No. 3

more likely to be of Polish origin. I will refer to him as 'DANNY'S COLLEAGUE'.

A female dancer. She told us her name was 'NATASHA'. She was much shorter than me and even in high heels, only just reached my shoulder. I am just over 6' tall. She was around her mid-thirties, had light brown / blonde hair and was very slim. She appeared to have had cosmetic surgery on her lips as they were quite pronounced. She was wearing a turquoise green, short dress and darker green/blue underpants. She also had a light coloured shawl or cardigan over her shoulders and carried a black purse. She wore no bra. She had a coloured tattoo on the left of her chest, near to her shoulder and a tattoo on her right upper thigh, which I believe formed the word 'BELIEVE'. NATASHA was white and had a foreign accent. When I asked her where she was from, she told me she was Italian. However, from her accent and having heard her speak in her own language, I would be sure that she was Romanian and not Italian. I will refer to her as 'NATASHA'.

A second female dancer. She told us her name was 'PAMELA'. She was much taller than NATASHA and was taller than Officer TARIQ. She was white, with black hair. She wore a black, short dress, black bra and black underpants and also carried a purse. She was of larger build than NATASHA

Signed..... Signature witnessed by

Birmingham City Council

STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation of statement of: **John PRESTON**

Sheet No. 4

and I would say was also in her mid-thirties. She too had a foreign accent and said she was from Italy. She spoke with NATASHA in a foreign accent, which sounded harsher than Italian. I would say she was also of Romanian origin. I will refer to her as 'PAMELA'.

There were also a number of other dancers in the club, along with some bar staff, a DJ and possibly one other plain clothes security guard / door supervisor, but I had little or no interaction with those individuals. The club also had a number of customers present at the time of our visit.

On Saturday 15th April 2017, Officer TARIQ and I met with ~~XXXXXX~~ Head of Licensing, in ~~XXXXXX~~ for a pre-exercise briefing. Officer ~~XXXXXX~~ confirmed details of the licensing conditions that we were to ascertain compliance with. The plan for the operation was to walk the length of Broad Street to see if any individuals were touting for business for the LEGS 11 club, gain entry to the club and observe practices within the club to ascertain compliance with licensing conditions. We were to use a Birmingham City Council credit card to make purchases of drinks or to pay for services offered. We were instructed not to consume alcohol. Both Officer TARIQ and I were in plain clothes for the exercise.

Signed..... Signature witnessed by

Birmingham City Council

STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation of statement of: **John PRESTON**

Sheet No. 5

At approximately 22:50 hours that day, Officer TARIQ and I left Jury's Inn Hotel and turned right on to Broad Street towards Walkabout Bar. We walked down to Walkabout Bar, turned around and walked back up Broad Street towards Five Ways. As we walked past the LEGS 11 club, THE DOOR SUPERVISOR, who was stood in the entrance, called over to us: "HALF PRICE ENTRY TONIGHT" and tried to encourage us to come into the club. We said that we might come in later and he joked: "I MIGHT HAVE CHANGED MY MIND LATER." We continued walking up Broad Street, crossed over the road towards the Job Centre and began walking back down. As we got level with the LEGS 11 club again, but this time on the other side of the road, THE DOOR SUPERVISOR waved and called out to us again, encouraging us to come over to the club. We laughed, made our excuses and continued walking back down Broad Street. The time was now approximately 22:55 hours.

When we were roughly level with Lee Longlands furniture shop, Officer TARIQ and I crossed back over Broad Street and continued walking down Broad Street. Stood outside the Figure of Eight Public House, I observed DANNY, leaning against a bollard. As members of the public were passing, particularly groups of young males, he was saying something, but I couldn't catch what it was. Officer TARIQ and I decided to stand outside the Figure of Eight Pub

Signed..... Signature witnessed by

Birmingham City Council

STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation of statement of: **John PRESTON**

Sheet No. 6

too, as if we were waiting for someone to join us. Whilst stood there, I continued to observe DANNY and could make out that he was saying things like: "LEGS 11 GUYS", "LEGS 11 FREE ENTRY" and "HALF PRICE DRINKS AT LEGS 11 TONIGHT". We observed him for approximately 2 minutes saying this to passing groups of males before Officer TARIQ asked him what was happening at LEGS 11. DANNY proceeded to explain that he could get us free entry to the LEGS 11 club, a free shot each or half price drinks and a £15 private dance. Officer TARIQ asked DANNY questions about the club and he explained that it would be a good night, with 48 dancers working there. He said that the dance was normally £20 each. He confirmed his name was 'DANNY'. Whilst Officer TARIQ was discussing the club with DANNY, I took a photograph of them both on my mobile phone. The photograph was timed at 23:04 hours and I can produce a print of it in evidence as my exhibit **JP/1**.

At that point, we were joined by DANNY'S COLLEAGUE. Officer TARIQ reconfirmed the details of the offer DANNY was making and asked if he had a card or voucher for the free entry and drinks that we could take with us. DANNY explained that he did, but he would physically take us to the club to get us a good deal. He then handed Officer TARIQ a LEGS 11 promotional card that he had taken from his pocket, which I recognise as exhibit **MT/3**. DANNY'S COLLEAGUE then handed me 5 LEGS 11 promotional cards,

Signed..... Signature witnessed by

Birmingham City Council

STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation of statement of: **John PRESTON**

Sheet No. 7

taken from his pocket. I can produce these in evidence as my exhibit,
reference **JP/2**.

DANNY then led Officer TARIQ and I to the LEGS 11 club. DANNY'S
COLLEAGUE remained down by the Figure of Eight Pub. As we walked,
Officer TARIQ commented on DANNY's accent and asked him where he was
from. However, he wouldn't really commit and just explained that he had lived
in London for a while.

On arrival at LEGS 11 at approximately 23:10 hours, we were greeted by THE
DOOR SUPERVISOR who recognised us from earlier, laughed and said: "AH
FINALLY!" DANNY led us into the entrance area and to a counter with a till.
THE DOOR SUPERVISOR followed on and went behind the till. He seemed
to be aware what deal we had been offered by DANNY and he took out some
paperwork from under the counter. I could see that it had a table drawn on it
with various handwritten names and notes. He asked us if we were both
having a dance and we confirmed we were. He noted something on the
paperwork and then said: "THAT'S £15 EACH THEN PLEASE." Officer
TARIQ and I both queried this as we thought we had been offered free entry,
but THE DOOR SUPERVISOR explained that we had to pay for our first
dance upfront. Officer TARIQ asked if he could pay for both dances on his

Signed, Signature witnessed by

Birmingham City Council

STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation of statement of: **John PRESTON**

Sheet No. 8

card. THE DOOR SUPERVISOR confirmed that he could, but cards attracted a 10% fee. I could see no sign or notice explaining this additional fee but Officer TARIQ agreed to pay it as we had no alternative payment method. A total of £33.00 was duly charged to Officer TARIQ's card. THE DOOR SUPERVISOR handed him the credit card terminal slip, which I recognise as exhibit **MT/4**.

As Officer TARIQ was paying the fee, he pointed out some LEGS 11 promotional cards on the counter next to the till. They were the same as those handed to us by DANNY and DANNY'S COLLEAGUE outside the Figure of Eight Pub. Officer TARIQ picked up two and handed me one. I can produce this card in evidence as my exhibit, reference **JP/3**.

THE DOOR SUPERVISOR then handed both Officer TARIQ and I a silver coloured slip of paper. It had '£20' written on it and looked similar to a gift voucher. He explained that this was to get our first dance. We took the vouchers and walked up the stairs and into the club.

On entry to the club, at approximately 23:12 hours that day, I could see a small stage area on the right hand side, with dancing poles. On the opposite side of the room and in the middle of the room were a number of seats and

Signed..... Signature witnessed by

STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation of statement of: **John PRESTON**

Sheet No. 9

small tables. Some customers were sat there with drinks. At the far end of the room was the bar, and just after the stage on the right hand side was the DJ's booth. On the opposite side of the room to the DJ's booth was a doorway with curtains across it. Just before the curtained door was a seating area with a number of female dancers sat there. It was fairly dark in the room, with lots of red lighting. Fairly loud music was playing and the DJ was making announcements about the dancers using the stage.

Officer TARIQ and I walked towards the bar with the intention of purchasing a drink. As we got approximately halfway across the room, and drew level with the seating for the dancers, PAMELA and NATASHA got up and came swiftly over to us. They said hello to us. PAMELA walked towards the bar with Officer TARIQ and NATASHA took hold of my left arm. As we walked to the bar, NATASHA stroked the inside of my left elbow up and down in an affectionate manner.

On arrival at the bar, Officer TARIQ showed the bar lady the promotional card he had been given which stipulated an offer for a double vodka for £5. He asked for two vodkas and two cokes. The drinks were poured and Officer TARIQ handed over his credit card. No itemised receipt was provided for the drinks so we were unable to ascertain what had been charged for each one,

Signed..... Signature witnessed by

STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation of statement of: **John PRESTON**


Sheet No. 10

but Officer TARIQ was given the credit card slip which stated a total of £12.10.
I recognise this as exhibit **MT/6**.

We then made small talk with PAMELA and NATASHA. They introduced themselves and we shook hands. NATASHA stood very close to me, her body pressed against mine. They seemed surprised that we hadn't been to a club like this before. After just a couple of minutes, they asked if we wanted a dance. We agreed and NATASHA took me by the hand and led me to the door with the curtains across it. PAMELA did likewise with Officer TARIQ. We took our drinks with us.

As NATASHA led me through the curtained entrance, I could see a narrow room with mirrors along one side and armchairs along the opposite side. I would estimate that there were approximately 8-10 armchairs along the wall, with dividers in between some of them to form a sort of individual booth. I could see a number of female dancers, some of whom were naked and performing dances for other customers.

NATASHA and PAMELA led us to the last two armchairs in the room. They were separated with a divider, so once sat down, I was unable to see any of the other customers or dancers, with the exception of Officer TARIQ,

Signed,  Signature witnessed by

STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation of statement of: **John PRESTON**

Sheet No. 11

NATASHA and PAMELA. NATASHA took my drinks from me and put them on a shelf. She ushered me into the last chair in the row and placed my hands on the arms of the chair. I took out the silver £20 voucher and placed it on the arm next to me. NATASHA took the voucher and sat down on my lap. She brought both of her knees up on to my lap so that she was entirely sat on my lap with the right side of her body resting on my chest. PAMELA crouched down in front of Officer TARIQ.

NATASHA explained to us that the voucher we had been given was only for a basic dance. She explained that if we wanted a more sexy dance, it would be £20. PAMELA joined in and explained that for the extra money, the dance would be better, would take longer and that they could "DO A LESBIAN SHOW". I had presumed at this stage that the girls meant an extra £5 each to make it back up to the original cost of £20, or perhaps that it was a further £20 between us. I explained to NATASHA that I didn't have any cash on me, so it was agreed that Officer TARIQ would pay the additional money at the bar afterwards.

NATASHA then stood up, put the £20 silver coloured voucher I had given her between her breasts and brought her breasts near to my face. She then took the voucher back out and put it into her purse. NATASHA then removed her

Signed..... Signature witnessed by

Birmingham City Council

STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation of statement of: **John PRESTON**

Sheet No. 12

dress and shoes, leaving her stood in just her underpants, with her breasts exposed. NATASHA then began to perform her dance for me, whilst PAMELA performed her dance for Officer TARIQ.

During the dance, NATASHA crouched down near to my crotch and moved her body upwards and very close to mine. As she moved upwards, her breasts brushed across my face. She did this a number of times. NATASHA used her right knee to caress the inside of my left leg and up to my crotch. She drew her knee across my crotch, touching my clothed penis with her knee as she went.

NATASHA felt that I had my mobile phone in my left trouser pocket, so asked me to remove it as it was getting in the way. I took it out and put it on the seat next to me. She then jumped up on to my armchair with her legs straddling my lap and her face close to mine. She moved her body downwards and upwards in front of my face and deliberately moved slightly to the side so that the nipple on her right breast touched my lips.

NATASHA then turned around with her back to me. She crouched at the knees so that her bottom was touching my crotch. She moved backwards and

Signed..... Signature witnessed by

Birmingham City Council

STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation of statement of: **John PRESTON**

Sheet No. 13

forwards, stroking my crotch with her bottom and then pressing down so that her full body weight was on my lap and she rocked backwards and forwards.

NATASHA then stood up and removed her underpants. She then turned around so that she had her back to me and she bent forwards. She proceeded to use her hands to spread her bottom cheeks and vagina and drew her middle finger down the middle suggestively.

NATASHA then sat on my lap with her back to me. She stroked her now naked bottom and vagina across my crotch area several times and made moaning noises. She turned around and straddled me again, bringing her breasts up to my face and moving up and down.

At various points throughout the performance, I would glance over to Officer TARIQ and observed PAMELA performing similar acts. Towards the end of the routine, I observed PAMELA completely naked with her vagina right in Officer TARIQ's face. She was using her fingers to open up her vagina. Officer TARIQ turned away and said to me "ARE YOU OK JOHN?" to which NATASHA replied: "OF COURSE HE IS OK, LOOK!" and she proceeded to shake her breasts in my face, each breast slapping against the sides of my face. During the performance, I also observed PAMELA sat on Officer

Signed..... Signature witnessed by

Birmingham City Council

STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)


Continuation of statement of: **John PRESTON**

Sheet No. 14

TARIQ's lap, naked, rocking backwards and forwards and making screaming and moaning noises, as though simulating a sexual act.

I would estimate that the performance lasted for approximately 3-4 minutes. Throughout that time, neither Officer TARIQ nor I, asked or encouraged the girls to perform any of the acts, nor did we actively touch them ourselves. The acts and physical touching was all done of their own volition. At the end, both girls put their clothes back on and we followed them back out of the room to the bar with our drinks.

NATASHA and PAMELA spoke to a lady behind the bar who took out a card machine and said that it would be £20 each. This surprised me as I had believed it to be no more than £20 between us. Nevertheless, Officer TARIQ provided his card and was charged £44.00. He was given the credit card terminal slip, which I recognise as exhibit **MT/7**. The bar lady then handed NATASHA and PAMELA a silver £20 voucher each, which they put in their purses. They were identical vouchers to the ones we had handed to them earlier and at that point, I realised we had effectively been charged for two dances each, despite only having one.

Signed...  ... Signature witnessed by

Birmingham City Council

STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation of statement of: **John PRESTON**

Sheet No. 15

Officer TARIQ, NATASHA, PAMELA and I then continued to make small talk at the bar. The girls explained that they were from Italy and NATASHA told me that she had worked there for 3 months. I asked her if she enjoyed it and she said that she did, but I didn't believe her.

NATASHA then asked us what our plan was for the rest of the evening. We asked what she meant and NATASHA and PAMELA proceeded to explain that for £150 each, they would take us to a 'naughty room'. Officer TARIQ asked what this would entail, but the girls wouldn't really commit, other than to say that it would be 'fun' and 'naughty' and they would 'make it worth our while'. They explained that we would be in individual rooms with lockable doors; that no-one would be able to see or enter the room and we would be alone with our corresponding girl. Officer TARIQ said "DO YOU MEAN SEX?" to which PAMELA replied "WELL, IF YOU'VE GOT A THOUSAND POUNDS DARLING".

We continued to talk about this offer for a short time. Officer TARIQ again asked the girls to be more explicit about what we would get for our £150, pointing out that it was a lot of money. NATASHA explained that as no-one would be looking, we would be able to 'touch them' and 'play with them'. Officer TARIQ asked me what I thought of the idea and I said I wasn't sure

Signed..... Signature witnessed by

Birmingham City Council

STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation of statement of: **John PRESTON**

Sheet No. 16

about it. NATASHA then moved closer to me with the left side of her body pressed against me. She put her head on my shoulder. With her right hand, she pushed two fingers between the buttons on my shirt and she stroked my chest and said softly: "OH COME ON." I again said that I wasn't sure about the idea and she then took hold of my trouser belt with her fingers and began tugging at it suggestively, again trying to encourage me to go with her.

Officer TARIQ made up an excuse that we had been waiting for some friends and wanted to see whether they wanted to join us. He explained that he needed to go and call them and he left the club briefly to make a phone call. His actual intention was to speak with our manager via telephone to explain what the girls were offering and seek his instructions. Whilst he was gone, NATASHA continued to encourage me to go through with the deal and seemed confused as to why we wanted to speak to our friends. I explained to NATASHA that Officer TARIQ was using his boss's company credit card for the dances and really needed to check whether it was ok to put the extra £150 each on. She found this funny and appeared to reiterate the story to PAMELA in their own language.

When Officer TARIQ returned, I explained to him what I had told the girls. NATASHA and PAMELA both joked with him about it and said that our boss

Signed..... Signature witnessed by

STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation of statement of: **John PRESTON**

Sheet No. 17

was probably out enjoying himself and to relax and join them for the £150 deal.

At this point, I briefly left the group to use the bathroom. In the gents toilet was a black male operating as a sort of washroom clerk. He had numerous aftershave bottles out on display in the bathroom and a male customer was paying him some money. I overheard him moaning at another customer who he said 'never had any change on him'. It became apparent that I too was going to have to give him some money. I used the toilet and took 50p from my wallet. I handed it to him. He looked at it in disgust and asked if that was all I had. I explained that it was and that I had no change. He clearly saw a £20 note in my wallet and explained that he had change for that. I ignored him and put the wallet back in my pocket. He continued to pressure me to give him more money. He was saying: "DON'T BE SHY NOW" and "COME ON, YOU LOOK AFTER YOUR GIRLS, YOU NEED TO LOOK AFTER ME." I repeated my assertion that I had nothing further to give him. In the end, I had to ask to wash my hands and he reluctantly squirted some liquid soap into my hands and turned the tap on. He again moaned that I had only given him 50p. He was quite intimidating and so I quickly washed my hands and left.

Signed..... Signature witnessed by

STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation of statement of: **John PRESTON**

Sheet No. 18

When I returned to the group, NATASHA and PAMELA continued to encourage us to join them for the £150 offer. We finished our cokes, leaving the vodka drinks untouched on the bar. We eventually made our excuses and left the club.

As we exited the club at approximately 23:50 hours that evening, I saw a stocky male wearing a t-shirt with a clear ear-piece in his ear, who I presumed was a plain clothes security guard or door supervisor. He was walking around by the stage area. Other than THE DOOR SUPERVISOR, I didn't see any other security staff throughout the premises and it struck me what little security provision was in place for the female dancers working there.

In total that evening, we had been charged £89.10 for one dance each, a vodka and a coke each and various credit card usage charges.

At the end of the exercise, Officer TARIQ and I returned to the Jury's Inn Hotel, where Officer ~~XXXXXX~~ handed us a Compliance Checklist each, to complete in respect of the visit to LEGS 11. I made notes on this two-page form accordingly. I can produce this checklist in evidence as my exhibit, reference JP/4.

Signed..... Signature witnessed by

Birmingham City Council

STATEMENT OF WITNESS

(Criminal Procedure Rules, r 16.2;
Criminal Justice Act 1967,s9)

STATEMENT OF MOHAMMED TARIQ

Age of witness (over 18)

Occupation of witness: TRADING STANDARDS ENFORCEMENT OFFICER

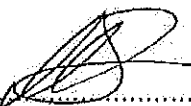
This statement, consisting of [21] page(s) each* signed by me, is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.

Dated the 26 day of April 2017

Signed  Witnessed by

I am employed by Birmingham City Council Place Directorate Regulation and Enforcement Division Trading Standards Section which is the local Weights and Measures Authority as a Trading Standards Enforcement Officer and as such I am authorised to enforce the provisions laid down by the Consumer Rights Act 2015, Consumer Protection from Unfair Trading Regulations 2008, and associated Trading Standards legislation.

On Saturday 08 April 2017 at approximately 22.40 hours I was standing outside the premises of Figure of Eight bar based at 236 – 239 Broad Street Birmingham.

Signed  Signature Witnessed by

SOW.LEGS 11

Birmingham City Council
Regulatory Services
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation Sheet No. 1 Statement of Mohammed TARIQ

I witnessed a young white male approaching members of the public and saying **"Legs 11 half price drinks – free entry before midnight"** and handing out Legs 11 promotional cards. This male was in his early to mid-thirties and around the same height as me which is 5'7". He had short stubble beard.

I noticed that this male was trying to conceal the Legs 11 promotional cards from open view to the members of the public, however when he was handing these cards out to the members of the public I could clearly see and read **"Legs 11"** on both sides of the card on the top left hand side. It was evident to me that this male was touting for business on behalf of Legs 11.

A few minutes later directly in front of me this male stopped a group of approximately four (4) white males and said to them **"Legs 11 half price drinks – free entry before midnight"** and handed them all Legs 11 promotional cards. I recall one male who was eating a hotdog pulled out a quantity of these Legs 11 promotional business cards from his pocket and said **"I just got a load of these fucking cards from another guy up the road"**. The group of males and the male handing out the Legs 11 promotional cards all just laughed.

Signed  Signature Witnessed by

Birmingham City Council
Regulatory Services
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)


Continuation Sheet No. 2 Statement of Mohammed TARIQ

As I was standing right next to this group of males the male handing out these Legs 11 promotional cards handed me one card and said "*Legs 11 half price drinks – free entry before midnight mate*".

I then read the card and which stated "*LEGS 11 SPECIAL OFFER 1>FREE ENTRY BEFORE MID NIGHT 2> DOUBLE VODKA JUST FOR £5*" and on the other side of the card "*LEGS 11 Gentlemens Club FOR GROUP BOOKING SPECIAL DISCOUNT BROAD STREET 193 – 194 Broad Street Birmingham B15 1AY Tel: [REDACTED] – CHINA TOWN 30 Ladywell Walk China Town Birmingham B5 4ST Tel [REDACTED]*
FOLLOW US ON FACEBOOK"

I now produce this Legs 11 promotional card in evidence as exhibit MT/1 signed and dated by me. This Legs 11 promotional card was then later placed in to an evidence bag with tamper seal bag number N05078270.

I asked the male if it was any good in there and was it really free entry and half price drinks to which he replied "*yeh mate free entry and half price drinks with lots of lovely sexy women*".

Signed  Signature Witnessed by

Birmingham City Council
Regulatory Services
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation Sheet No. 3 Statement of Mohammed TARIQ

I then informed this male that I was waiting for a few friends and I would most definitely be going there later on. The male replied "**Ok**".

I then asked this male "**there is not going to be a problem if I go there and they will charge me and my mates an entry fee**", to which he replied "**Naa mate don't worry**". I then asked him for his name to which he replied "**[REDACTED]**". [REDACTED] also went on to say "**Just say Harry sent you and show them the card**". I then replied "**Ok see you later mate**".

I waited for a short while and then I made my way towards the city centre direction on Broad Street Birmingham.

As I approached the Travel Lodge on Broad Street Birmingham I witnessed another young white male approaching members of the public and saying "**Legs 11 half price drinks – free entry before midnight**" and handing out Leg 11 promotional cards. This male was in his mid to late twenties around 5'6" tall. He had short beard.

Once again I noticed that this male was also trying to conceal the Legs 11 promotional cards from open view to the members of the public, however

Signed  Signature Witnessed by

Birmingham City Council
Regulatory Services
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation Sheet No. 4 Statement of Mohammed TARIQ

when he was handing these cards out to the members of the public I could clearly see and read "**Legs 11**" on both sides of the card on the top left hand side. It was evident to me that this male was also touting for business on behalf of Legs 11.

I then stopped directly outside Travel Lodge on Broad Street Birmingham and observed this male approaching members of the public and handing out Legs 11 promotional cards.

This male looked at me observing him handing out these cards and then came up to me and said "**Legs 11 half price drinks – free entry before midnight**" and handed me a Legs 11 promotional card. I asked this male "**is it any good**" to which he replied "**yes mate you will like it**". This male then went on to say "**come on ill take you there now**".

I informed him that I was waiting for some friends but may go there later. The male then went on to say "**Ok at the door just mention that Lucas sent you, mention my name Lucas and they will look after you**".

Signed



Signature Witnessed by

Birmingham City Council
Regulatory Services
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation Sheet No. 5 Statement of Mohammed TARIQ


I then read the card and it stated "**LEGS 11 Gentlemens Club FOR GROUP
BOOKING SPECIAL DISCOUNT BROAD STREET 193 – 194 Broad Street
Birmingham B15 1AY Tel: [REDACTED] – CHINA TOWN 30 Ladywell Walk
China Town Birmingham B5 4ST Tel [REDACTED]
[REDACTED] FOLLOW US ON FACEBOOK**" and on the
other side it stated had adverts for [REDACTED] Restaurant and Legs 11
for China Town and Broad Street".

The cards that he was handing were similar to the ones [REDACTED] WAS handing out.

I now produce this Legs 11 promotional card in evidence as exhibit **MT/2** signed and
dated by me. This Legs 11 promotional card was then later placed in to an evidence
bag with tamper bag seal number **N05078269**.

I then informed Lucas that I may see him later at Legs 11. Lucas replied "ok" and we
both went our separate ways.

On Saturday 15 April 2017, I met up with John PRESTON Financial Investigator and
Mr Chris NEVILLE, Head of Licensing both from Birmingham City Council Place

Signed  Signature Witnessed by

**Birmingham City Council
Regulatory Services
STATEMENT OF WITNESS**

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation Sheet No. 6 Statement of Mohammed TARIQ

Directorate Regulation and Enforcement Division, at Jury's Inn Hotel on Broad Street Birmingham for a pre-exercise briefing in relation to Legs 11 gentlemen's club. Officer NEVILLE confirmed details of the licensing conditions that Legs 11 should be complying with. The plan for the exercise was to walk the length of Broad Street Birmingham to see if any individuals were touting for business for the LEGS 11 gentlemen's club gain entry to the club in order to observe to see if they were complying with their licensing conditions.

I was authorised by Officer NEVILLE to use my Birmingham City Council purchase card to make purchases of drinks or to pay for any services offered. We were instructed not to consume any alcohol. Both Officer PRESTON and I were in smart plain clothes for the exercise.

At approximately 22:50 hours Officer PRESTON and I left Jury's Inn Hotel and turned right on to Broad Street towards the city centre direction. We walked down to Walkabout Bar, and then turned around and walked back up Broad Street towards Five Ways Island in the direction of Hagley Road Birmingham. As we walked past the Legs 11 gentlemen's club based at 193 – 194 Broad Street Birmingham B15 1AY, a Security Industry Authority (SIA) security door staff, who was standing in the

Signed



Signature Witnessed by

**Birmingham City Council
Regulatory Services
STATEMENT OF WITNESS**


(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation Sheet No. 7 Statement of Mohammed TARIQ

entrance of the venue, called over me and Officer PRESTON ***"half price entry tonight"*** and tried to encourage us to come into the club. We both said that we might come in later. The security door staff joked and said : ***"I might have changed my mind later"***.

Officer PRESTON and I continued walking up Broad Street towards the direction of Five Ways Island and Hagley Road Birmingham. We both then crossed over the road by the Job Centre and began walking back down on Broad Street Birmingham towards the direction of the city centre. As we walked past Legs 11 gentlemen's club on the opposite side of the road, the same Security Industry Authority (SIA) security door staff waved at us and called out once again encouraging both me and Officer PRESTON to come over to the club. We both laughed and carried on walking down Broad Street towards the city centre direction. The time was now approximately 22:55 hours.

As we approached Lee Longlands on the opposite side of the road, Officer PRESTON and I crossed over Broad Street and continued walking on Broad Street towards the city centre Birmingham.

Signed  Signature Witnessed by

Birmingham City Council
Regulatory Services
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation Sheet No. 8 Statement of Mohammed TARIQ

Officer PRESTON and I both stood outside the Figure of Eight bar, and observed a young white male who I now know to be DANNY, leaning against a bollard.

I witnessed DANNY saying "**Legs 11 Legs 11**", "**half price drinks free entry before midnight**" as members of the public walked past him in particular groups of young males.

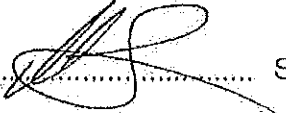
I then walked up to DANNY and asked him "**are the drinks really half price and is it really free entry**" to which DANNY replied "**yes**".

I would say DANNY was mid-to-late-thirties and around the same height as me approximately 5'7". He had short black hair and a short black beard. He was wearing a khaki coloured jacket, black jeans and grey / green coloured trainers.

Whilst I was having a chat with DANNY about Legs 11, Officer PRESTON took a photograph of me and DANNY which I now identify as exhibit JP/1.

Officer PRESTON then walked over to me and DANNY.

I asked DANNY if he had Legs 11 promotional cards or vouchers for the free entry and drinks that we could take with us. DANNY explained that he did, but he would

Signed  Signature Witnessed by

**Birmingham City Council
Regulatory Services
STATEMENT OF WITNESS**


(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation Sheet No. 9 Statement of Mohammed TARIQ

physically take us to the Legs 11 club to get us a good deal. DANNY proceeded to explain that he could get us free entry to the Legs 11 club, a free shot each or half price drinks and a £15 private dance. I asked DANNY questions about the club and he explained that it would be a good night, with 48 dancers working there. He said that the dance would normally cost £20.00 each. At this stage he confirmed his name was 'DANNY'. DANNY then handed me LEGS 11 promotional card which he took out from jacket pocket.

The Legs 11 promotional card which he handed to me which stated "**LEGS 11 SPECIAL OFFER 1>FREE ENTRY BEFORE MID NIGHT 2> BOTTLE OF STELLA JUST FOR £3**" and on the other side of the card "**LEGS 11 Gentlemens Club FOR GROUP BOOKING SPECIAL DISCOUNT BROAD STREET 193 – 194 Broad Street Birmingham B15 1AY Tel: [REDACTED] – CHINA TOWN 30 Ladywell Walk China Town Birmingham B5 4ST Tel [REDACTED] FOLLOW US ON FACEBOOK**"

I now produce this Legs 11 promotional card in evidence as exhibit **MT/3** signed and dated by me. This Legs 11 promotional card was then later placed in to an evidence bag with tamper seal number **M10322428**.

Signed  Signature Witnessed by

Birmingham City Council
~~Regulatory Services~~
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

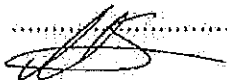
Continuation Sheet No. 10 Statement of Mohammed TARIQ

At that point, we were joined by DANNY'S colleague who was also touting for business. This young male was much lighter skinned than DANNY and had short, light coloured hair. He was around the same height as me. He wore a dark coloured bomber jacket. He handed Officer PRESTON 5 (five) Legs 11 promotional cards, which I now identify in evidence as exhibit JP/2.

Officer PRESTON and I then agreed to go to the club. DANNY then escorted us to the Legs 11 gentlemen's club on Broad Street Birmingham B15 1AY.

Whilst we were walking to the club DANNY informed us that the girls were sexy but we could not touch them but special arrangements could be made for us if we wanted to. Danny also informed us that he worked in bars in London and may be returning back there soon.

At approximately 23:10 hours Officer PRESTON and I arrived at the Legs 11 gentlemen's club at 193 – 194 Broad Street Birmingham B15 1AY. The same Security Industry Authority (SIA) security door staff welcomed us and recognised us from earlier on just laughed and said: "*ah finally*".

DANNY led us into the entrance area towards the till / counter with a till. The security
Signed  Signature Witnessed by

Birmingham City Council
Regulatory Services
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation Sheet No. 11 Statement of Mohammed TARIQ

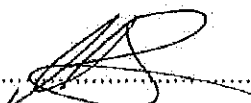
door supervisor went behind the till. He seemed to be aware what deal we had been offered by DANNY. He then asked us both if we were having a dance and we said "yes".

He then noted something on some paperwork and said: "**that's £15.00 each then please.**" Officer PRESTON and I both queried this as we thought we had been told it was free entry, but the security door staff explained that we had to pay for our first dance upfront.

I then handed my Birmingham City Council purchase card and asked him if I could pay for both dances on my card. The security door staff confirmed that I could pay on my card but stated "**there will be a 10% additional charge**". I could not see any signs or notices explaining that there would be an additional fee nevertheless I agreed to pay.

I was charged a total amount of £33.00. Once I made the payment I was issued with a credit card receipt which I now produce a copy in evidence as exhibit **MT/4** signed and dated by me.

This credit card receipt was then later placed in to an evidence bag with tamper seal

Signed  Signature Witnessed by

Birmingham City Council
Regulatory Services
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)


Continuation Sheet No. 12 Statement of Mohammed TARIQ

Number **M10322427**. I was not given an itemised receipt. On the top of the credit card receipt it stated **"TAKE IT BACK LIMITED"**.

As I was paying for the dance fee I noticed the same Legs 11 promotional cards by the till. I took two of these Legs 11 promotional business cards and handed one to Officer PRESTON. These Legs 11 promotional business cards were identical to the ones I obtained on Saturday 08 April 2017 and that evening.

This Legs 11 promotional business card stated **"LEGS 11 SPECIAL OFFER 1>FREE ENTRY BEFORE MID NIGHT 2> DOUBLE VODKA JUST FOR £3"** and on the other side of the card **"LEGS 11 Gentlemens Club FOR GROUP BOOKING SPECIAL DISCOUNT BROAD STREET 193 – 194 Broad Street Birmingham B15 1AY Tel: [REDACTED] – CHINA TOWN 30 Ladywell Walk China Town Birmingham B5 4ST Tel [REDACTED] FOLLOW US ON FACEBOOK"**

I now produce this Legs 11 promotional card in evidence as exhibit **MT/5** signed and dated by me.

Signed  Signature Witnessed by

Birmingham City Council
Regulatory Services
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation Sheet No. 13 Statement of Mohammed TARIQ

This Legs 11 promotional card was then later placed in to an evidence bag with tamper seal bag number **M10322427**.

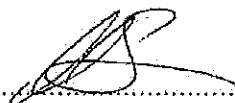
The security door staff then handed both Officer PRESTON and I a coloured slip of paper. It had £20.00 written on it and looked similar to a gift voucher.

The security door staff explained that this voucher got us our first dance. Officer PRESTON and I then took the vouchers and at approximately 23:12 hours we both walked up the stairs and into the club.

Upon entering the main area of the club I could see a stage area on the right hand side of the club, with dancing poles. On the opposite side of the room and in the middle part of the club there were a number of seats and tables. I noticed some customers were sitting there having a drink.

At the back of the premises was a bar, and just after the stage on the right hand side was the DJ's booth. There was also a doorway with curtains across it. Music was being played and the DJ was making announcements about the dancers using the stage.

Signed



Signature Witnessed by

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Birmingham City Council
Regulatory Services
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation Sheet No. 14 Statement of Mohammed TARIQ

As Officer PRESTON and I were walking towards the bar I could see we were drawing a lot of attention from various females.

I noticed two females in particular who began to follow us to the bar.

Officer PRESTON and I walked towards the bar in order to purchase some drinks.

As we both got near to the bar two females who I believe were working at Legs 11 came up to me and Officer PRESTON and one of the females pinched my right buttock from behind. As I turned round to see who it was the female smiled and said "**hello**". These two females later identified themselves as PAMELA and NATASHA. NATASHA was the female who pinched my right buttock.

PAMELA was taller than me and NATASHA. She was white, with black hair. PAMELA wore a short black dress, with a black bra and black underpants and also carried a purse. PAMELA was of larger build than NATASHA. I would say PAMELA was in her mid to late thirties. PAMELA had a foreign accent and said she was from Italy.

Signed



Signature Witnessed by

Birmingham City Council
Regulatory Services
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation Sheet No. 15 Statement of Mohammed TARIQ


NATASHA was shorter than me and PAMELA. NATASHA was white and had light brown or blonde hair and was very slim. NATASHA appeared to have had cosmetic surgery on her lips as they were quite bloated. NATASHA wore a short green dress and dark green/blue underpants. NATASHA also had a light coloured shawl or cardigan over her shoulders and carried a black purse. I noticed that NATASHA was not wearing a bra as her breasts were exposed through her dress. I would say she was around mid to late thirties NATASHA also had a foreign accent.

They both said hello to us. PAMELA walked towards the bar with me and NATASHA walked towards the bar with Officer PRESTON.

Upon arriving at the bar, I noticed various people serving behind the bar. I then handed the bar lady (who was dark skinned) the promotional card regarding the offer for a double vodka for £5. I asked the bar lady for two vodkas and two cokes.

When the drinks were served I handed over my Birmingham City Council purchase card. I was then charged a total amount of £12.10 for the drinks.

Once I made the payment I was issued with a credit card receipt which I now

Signed  Signature Witnessed by

Birmingham City Council
~~Regulatory Services~~
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation Sheet No. 16 Statement of Mohammed TARIQ

produce a copy in evidence as exhibit **MT/6** signed and dated by me.

This credit card receipt was then later placed in to an evidence bag with tamper seal number **M10322424**. I was not given an itemised receipt. On the top of the credit

card receipt it stated "**TAKE IT BACK LIMITED**".

Officer PRESTON and I then had a general chat with NATASHA and PAMELA. PAMELA stood very close to me and NATASHA stood very close to Officer PRESTON. Both females were pressing their bodies against me and Officer PRESTON. They were generally flirting with us.

PAMELA asked me if I ever been to a club like this before to which I replied "**no**". Both PAMELA and NATASHA seemed to be very surprised by this.

A few minutes later, they both asked me and Officer PRESTON if we wanted a dance. Officer PRESTON and I both agreed and both PAMELA and NATASHA took me and Officer PRESTON to a door with the curtains across it. We also took our drinks with us.

Signed



Signature Witnessed by

Birmingham City Council
Regulatory Services
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation Sheet No. 17 Statement of Mohammed TARIQ

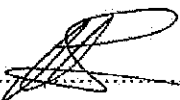
We were led through a curtained entrance, and I could see a narrow room with mirrors on the right hand side and chairs along the left hand side. These chairs had dividers in between them to make an individual booth. In my opinion these was not a private area but it was more of open plan seating area with each section being partially private.

I could see a number of female dancers, some of who were naked and performing dances for other Legs 11 customers.

PAMELA and NATASHA led us to the last two chairs in the room on the left hand side of the premises.

This seating area was separated with a divider and I was unable to see any of the other customers or dancers, with the exception of Officer PRESTON, NATASHA and PAMELA. PAMELA took my drink from me and put it a shelf behind her.

PAMELA then asked for the £20.00 voucher. I took out the £20.00 voucher from my pocket. PAMELA then asked me to place the £20.00 voucher between her breasts and brought her breasts near to my face. As requested I then placed the £20.00

Signed  Signature Witnessed by

Birmingham City Council
Regulatory Services
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation Sheet No. 18 Statement of Mohammed TARIQ


voucher between PAMELA's breasts. At this stage PAMELA was on my lap and crouched down in front me.

Both PAMELA and NATASHA then explained to us that the vouchers we had been given were only for a basic dance. PAMELA went on to say that if we wanted a more sexy dance, then it would be £20.00. NATASHA joined in the conversation and explained that for the extra £20.00 the dance would be better, would take longer and that they could "*do a lesbian show*".

I got the impression that NATASHA and PAMELA meant an extra £5.00 each to make it back up to the original cost of £20.00.

I explained to PAMELA that I didn't have any cash, so it was agreed that I would pay the additional payment at the bar after the dance with my credit card. PAMELA agreed.

PAMELA then removed her top, with her breasts fully exposed. PAMELA then began to perform her dance in front of me. I observed NATASHA perform her dance for Officer PRESTON.

Signed  Signature Witnessed by

Birmingham City Council
Regulatory Services
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)


Continuation Sheet No. 19 Statement of Mohammed TARIQ

During the dance, PAMELA crouched down near to my crotch and moved her body upwards and very close to mine. As she moved up and down, her breasts brushed across my crotch area and face. PAMELA did this a number of times during the dance. PAMELA kept rubbing her body in particular her vagina against my penis.

PAMELA then stood up and removed her underpants. PAMELA then turned around so that she had her back to me and she bent forwards visibly showing her bottom cheeks, anus and vagina and proceeded feel herself.

During this dance PAMELA sat on my lap with her back to me. PAMELA stroked her naked bottom and vagina across my crotch area several times and made moaning noises. PAMELA turned around and proceeded to bring her breasts up to my face and moving up and down. At times she would bring her nipples close to my face and mouth but I would immediately look over to Officer PRESTON and ask him if he was OK. This was done to avoid her nipples going in to my mouth.

At various points throughout the performance, I would glance over to Officer PRESTON and observed NATASHA was performing similar acts and dance.

Signed  Signature Witnessed by

Birmingham City Council
~~Regulatory Services~~
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation Sheet No. 20 Statement of Mohammed TARIQ

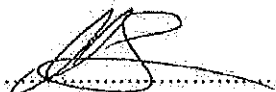
At one stage PAMELA began to bring her vagina close to my face and then proceeded to open her vagina showing me the full view of her vagina and cliterous. PAMELA began to bring her vagina close to my face which I believed she wanted me to kiss it. I immediately at this stage turned round looked towards Officer PRESTON to witness and get his attention. I noticed NATASHA was sitting on Officer PRESTON in full nudity with her breast near Officer PRESTON's face.

I then asked Officer PRESTON if he was Ok to which NATASHA replied "**Off course he is OK look**" and proceeded to shake her breasts in Officer PRESTONS face, with each breast slapping against the sides of his face.

During the performance, PAMELA sat on my lap, naked, rocking backwards and forwards and making screaming and moaning noises, as though simulating a sexual act. She also started to rub her legs and vagina against me and continued making screaming and moaning noises.

This sexual dance, act and contact lasted around approximately 3-4 minutes. Throughout that time, neither Officer PRESTON nor I, asked or encouraged NATASHA and PAMELA to perform such acts, and nor did we actively touch them

Signed



Signature Witnessed by

Birmingham City Council
Regulatory Services
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation Sheet No. 21 Statement of Mohammed TARIQ

ourselves.

The acts and the physical contact were all done of their own accord. At the end of the dance, both NATASHA and PAMELA put their clothes back on and we followed them back out of the room to the bar with our drinks.


I can confirm that PAMELA and NATASHA did not perform a lesbian show as promised as part of the extra £20.00 payment.

PAMELA and NATASHA spoke to a lady behind the bar who took out a card machine. I was then requested to pay the additional £20.00 each for the dance we both just had. I was slightly taken back by this amount as I thought it was not going to be more than £20.00 between us.

I then handed my Birmingham City Council credit card to a female behind the bar.

I was then charged a total amount of £44.00.

Once I made the payment I was issued with a credit card receipt which I now produce a copy in evidence as exhibit **MT/7** signed and dated by me.

Signed  Signature Witnessed by

Birmingham City Council
~~Regulatory Services~~
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation Sheet No. 22 Statement of Mohammed TARIQ

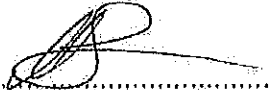
This credit card receipt was then later placed in to an evidence bag with tamper seal number **M10322425**. I was not given an itemised receipt for this transaction. On the top of the credit card receipt it stated "**TAKE IT BACK LIMITED**".

The bar lady then handed PAMELA and NATASHA £20.00 voucher each, which they put in their purses straight away. These looked like identical vouchers to the ones we had handed to them earlier on. Clearly we had been overcharged for the two dances.

I then along with Officer PRESTON, PAMELA and NATASHA had a chat at the bar.

PAMELA and NATASHA explained that they were from Italy and NATASHA told Officer PRESTON that she had worked at Legs 11 for 3 months. Officer PRESTON asked NATASHA if she enjoyed it and she said that she did.

NATASHA then asked us what our plan was for the rest of the evening. We asked what she meant and PAMELA and NATASHA proceeded to explain that for £150.00 each, they would take us to a '*naughty room*'.

Signed  Signature Witnessed by

Birmingham City Council
Regulatory Services
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation Sheet No. 23 Statement of Mohammed TARIQ

I asked PAMELA and NATASHA what did this '*naughty room*' entail, but PAMELA and NATASHA wouldn't really commit, themselves but they both did say it would be '*fun*' and '*naughty*' and they would '*make it worth our while*'.

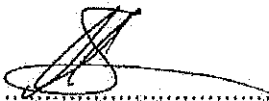
PAMELA explained that we would be in individual rooms with lockable doors; that no-one would be able to come in or see and we would alone.

I then asked PAMELA "*do you mean sex?*" to which PAMELA replied "*Well if you got a £1000 darling*".

We all then continued to talk about this offer for a short while. I once again I asked PAMELA to be more explicit about what we would get for our £150.00 pointing out that it was a lot of money. NATASHA explained that as no-one would be looking, we would be able to '*touch them*' and '*play with them*'.

I asked Officer PRESTON what I thought of the idea and Officer PRESTON said he wasn't sure about it.

Signed



Signature Witnessed by

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Birmingham City Council
Regulatory Services
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation Sheet No. 24 Statement of Mohammed TARIQ

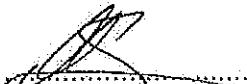
PAMELA then moved closer to me and pressed her body against me and kept saying "**come on**". I then made up an excuse that I was waiting for some friends and wanted to see whether they wanted to join us.

I explained I needed to go and call them. I then left the club and made the telephone call from outside on Broad Street.

I tried to call Officer NEVILLE to inform him what PAMELA and NATASHA were offering us and seek his instructions, however I was unable to get through to Officer NEVILLE.

When I returned back to the club Officer PRESTON informed me that he had told PAMELA and NATASHA that as I will be using the company credit card for the "**naughty room**" I would need to his permission to put the extra £150.00 each on to the card.

PAMELA and NATASHA both joked with me about my boss and said he was probably out enjoying himself already.

Signed  Signature Witnessed by

Birmingham City Council
Regulatory Services
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation Sheet No. 25 Statement of Mohammed TARIQ

PAMELA and NATASHA both became very pushy for us to pay the £150.00 each for the "**naughty room**" and said don't worry about the receipt it will not say Legs 11 but it will say "**take it back limited**".


Officer PRESTON and I finished our cokes and left the vodka drinks untouched on the bar. We both then made an excuse and left the club.

At approximately 23:50 I along with Officer PRESTON left legs 11.

During our time at the club I saw very little security in place for the female dancers working there.

As a result of the exercise I spent a total of £89.10 for one dance each, a vodka and a coke each and various credit card usage charges.

Officer PRESTON and I then went back to the Jury's Inn Hotel on Broad Street Birmingham and met up with Officer NEVILLE and had a debriefing.

Signed  Signature Witnessed by

Birmingham City Council
Regulatory Services
STATEMENT OF WITNESS

(Criminal Procedure Rules, r27.1; Criminal Justice Act 1967,
s9, Magistrates' Courts Act 1980 ss5A &5B)

Continuation Sheet No. 26 Statement of Mohammed TARIQ

I also completed a compliance check list which I now produce in evidence as exhibit
MT/8.



Signed  Signature Witnessed by


84

LEGS 11
Gentlemen's Club

**FOR GROUP
BOOKING
SPECIAL
DISCOUNT**

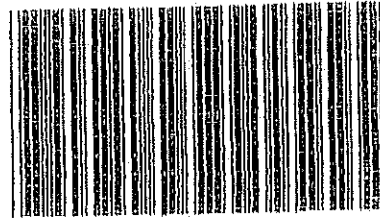
BROAD STREET
193 - 194 Broad Street
Birmingham B15 1AY
Tel: 0121 666 6660

CHINA TOWN
30 Ladywell Wall, China Town
Birmingham B5 4ST
Tel: 0121 666 7004

WWW.LEGS11LAPDANCING.COM  FOLLOW US ON FACEBOOK

85

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N05078270

EVIDENCE BAG

Authority <u>B'HAIR CITY/COUNTY</u> (Continuity)		
Identification Ref. No. <u>MT/1</u>	Name/Rank/No. (Block Letters)	Name/Rank
Court Exhibit No.	Signed	Signed
R-V	Date	Date
Property Ref. No.	Name/Rank/No. (Block Letters)	Name/Rank
Description <u>1 X LEGAL CARD</u>	Signed	Signed
	Date	Date
	Name/Rank/No. (Block Letters)	Name/Rank
Time/Date Seized/Produced <u>10:45 PM - 8/4/17</u>	Signed	Signed
	Date	Date
Where Seized/Produced <u>OUTSIDE FIGURE OF EIGHT PLR BROAD STREET BL 2149</u>	Name/Rank/No. (Block Letters)	Name/Rank
Seized/Produced by <u>M. TAKIP</u>	Signed	Signed
Signed <u>[Signature]</u>	Date	Date
	Name/Rank/No. (Block Letters)	Name/Rank
Incident/Crime No.	Signed	Signed
Major incident Exhibit No.	Date	Date
Laboratory Ref.		

BAG OPENED BY

SIGNATURE

TIME

DATE

REASON

WITNESSED BY

SIGNATURE

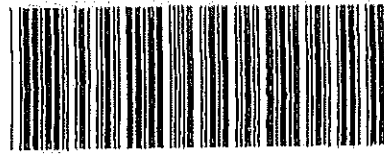
TIME

REASON

WITNESSED BY

86

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M10322427

EVIDENCE BAG

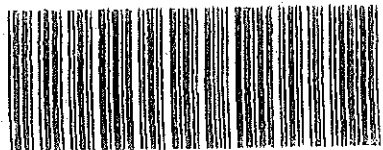
Authority <u>BIRMINGHAM</u>	(Continuity)	(Continuity)
Identification Ref. No. <u>MT/4</u>	Name/Rank/No. (Block Letters)	Name/Rank/No. (Block Letters)
Court Exhibit No.	Signed.....	Signed.....
R-V.....	Date	Date
Property Ref. No.	Name/Rank/No. (Block Letters)	Name/Rank/No. (Block Letters)
Description <u>233.00 PCEAP</u> <u>F.P. DANKE</u>	Signed.....	Signed.....
.....	Date	Date
.....	Name/Rank/No. (Block Letters)	Name/Rank/No. (Block Letters)
Time/Date Seized/Produced <u>15/4/17 2311 HRS</u>	Signed.....	Signed.....
.....	Date	Date
Where Seized/Produced <u>LE9811-193-194-</u> <u>BROAD STREET</u> <u>BIRMINGHAM</u>	Name/Rank/No. (Block Letters)	Name/Rank/No. (Block Letters)
.....	Signed.....	Signed.....
Seized/Produced by <u>IT MRP</u>	Date	Date
Signed <u>[Signature]</u>	Name/Rank/No. (Block Letters)	Name/Rank/No. (Block Letters)
Incident/Crime No.	Signed.....	Signed.....
Major Incident Exhibit No.	Date	Date
Laboratory Ref.		

BAG OPENED BY	WITNESSED BY
SIGNATURE _____ TIME _____ DATE _____	SIGNATURE _____ TIME _____ DATE _____
REASON _____	REASON _____
BAG OPENED BY	WITNESSED BY
SIGNATURE _____ TIME _____ DATE _____	SIGNATURE _____ TIME _____ DATE _____
REASON _____	REASON _____

WRITE IN BALL PEN IN BOXES PROVIDED

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87



M10355457

EVIDENCE BAG

TAKE IT BACK LIMITED

193-194 BROAD STREET
BIRMINGHAM

M***90333 TID***7938

AID : A0000000031010

VISACREDIT

VISA

**** * 4905

ICC PAN SEQ 02

SALE

CARDHOLDER COPY

PLEASE KEEP THIS RECEIPT
FOR YOUR RECORDS

AMOUNT £33.00

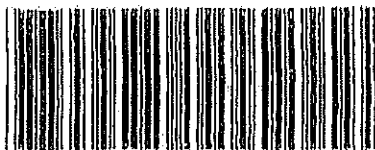
Verified by PIN

THANK YOU

23:07 15/04/17 40IF6:00

AUTH CODE: 074258

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M10322424

EVIDENCE BAG

Authority <u>BIRMINGHAM CRIME</u> (Continuity)		(Continuity)
Identification Ref. No. <u>M10322424</u>	Name/Rank/No. (Block Letters)	Name/Rank/No. (Block Letters)
Court Exhibit No.	Signed	Signed
R-V	Date	Date
Property Ref. No.	Name/Rank/No. (Block Letters)	Name/Rank/No. (Block Letters)
Description <u>CACTUS RECEPTACLE</u> <u>FOR DRINKS</u> <u>212-10</u>	Signed	Signed
	Date	Date
	Name/Rank/No. (Block Letters)	Name/Rank/No. (Block Letters)
Time/Date Seized/Produced <u>15/09/17 23:14 IRS</u>	Signed	Signed
	Date	Date
Where Seized/Produced <u>1235 11 - 193-194</u> <u>22ND STREET</u> <u>WIRTINGHAM</u>	Name/Rank/No. (Block Letters)	Name/Rank/No. (Block Letters)
	Signed	Signed
	Date	Date
Seized/Produced by <u>M. T. King</u>	Name/Rank/No. (Block Letters)	Name/Rank/No. (Block Letters)
Signed <u>[Signature]</u>		
Incident/Crime No.	Signed	Signed
Major incident Exhibit No.	Date	Date
Laboratory Ref.		

BAG OPENED BY	WITNESSED BY
SIGNATURE _____ TIME _____ DATE _____	SIGNATURE _____ TIME _____ DATE _____
REASON _____	REASON _____
BAG OPENED BY	WITNESSED BY
SIGNATURE _____ TIME _____ DATE _____	SIGNATURE _____ TIME _____ DATE _____
REASON _____	REASON _____

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89



M10355454

EVIDENCE BAG

TAKE IT BACK LIMITED
193-194 BROAD STREET

H**90333 TID**3130
AID : A0000000031010
VISACREDIT

VISA

*** 4905
ICC PAN.SEQ 02

SALE

CARDHOLDER COPY

PLEASE KEEP THIS RECEIPT
FOR YOUR RECORDS

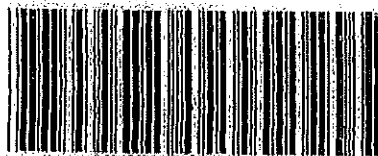
AMOUNT £12.10

Verified by PIN

THANK YOU
23:14 15/04/17

AUTH CODE: 087374

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Security Bags



M10322425

EVIDENCE BAG

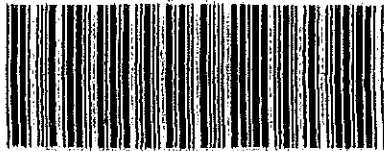
Authority <u>BIAH/CH/100612</u>	(Continuity)	(Continuity)
Identification Ref. No. <u>MT/7</u>	Name/Rank/No. (Block Letters)	Name/Rank/No. (Block Letters)
Court Exhibit No. _____	Signed _____	Signed _____
R-V _____	Date _____	Date _____
Property Ref. No. _____	Name/Rank/No. (Block Letters)	Name/Rank/No. (Block Letters)
Description <u>CARD RECEIPT</u> <u>FOR DANCE</u> <u>244.00</u>	Signed _____	Signed _____
Time/Date Seized/Produced <u>2328 15/4/17</u>	Date _____	Date _____
Where Seized/Produced <u>LEGS 11-193-194</u> <u>BROAD ST</u> <u>BIRMINGHAM</u>	Name/Rank/No. (Block Letters)	Name/Rank/No. (Block Letters)
Seized/Produced by <u>IT JACRO</u>	Signed _____	Signed _____
Signed _____	Date _____	Date _____
Incident/Crime No. _____	Name/Rank/No. (Block Letters)	Name/Rank/No. (Block Letters)
Major Incident Exhibit No. _____	Signed _____	Signed _____
Laboratory Ref. _____	Date _____	Date _____

BAG OPENED BY	WITNESSED BY
SIGNATURE _____ TIME _____ DATE _____	SIGNATURE _____ TIME _____ DATE _____
REASON _____	REASON _____
BAG OPENED BY	WITNESSED BY
SIGNATURE _____ TIME _____ DATE _____	SIGNATURE _____ TIME _____ DATE _____
REASON _____	REASON _____

WRITE IN BALL PEN IN BOXES PROVIDED.

91

Security Page 2



0355452

EVIDENCE BAG

[illegible]

92

RESTRICTED (when complete)
RESTRICTED (when complete)

MG11

MG11

WITNESS STATEMENT

Crime Number: 203W/256852 A/16

Criminal Procedure Rules, r 27.2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B

Statement of: [REDACTED]

URN [REDACTED]

Age if under 18: 018

(if over 18 insert 'over 18')

Occupation: [REDACTED]

This statement (consisting of 3 page(s) 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 in it, anything which I know to be false, or do not believe to be true.

Signature: [REDACTED]

Date: 28/12/2016

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

I Make This Statement In Relation To A Night I Was On Friday 23rd December 2016 When I Went For A Drink In Broad Street Birmingham With Some Friends. I Got A Lift To The Brasserie Where I Met My Mums And We Had A Few Drinks And Chatted For A While I Was At The Brasserie For Around Two And A Half Hours And In That Time Had About Five Bottles Of Budweiser To Drink.

I Can Recall That I Left The Brasserie At About 1030PM To 1100PM. I Had Not Kept An Eye On The Time So I Cannot Say Exactly.

I Then Walked Down To Legs Green On My Own When I Got To The Door I Think I Had To Pay Around £10 To Get In But I Don't Clearly Recall How Much It Was I Went Straight To The Bar And Ordered A Brandy And Coke And Paid With Cash As I Stood At The Bar A Woman Approaches Me I Can Only Assume She Was One Of The Girls Who Worked There She Was Eastern European With Blonde Straight Hair Which Was Quite Long And Hair Down Her Arms And Free Hanging She Was On A Gold Type Dress Which May Have Been A Two Piece. I Cannot Be Sure She Was Of A Slim Build And Was Small About 5 Feet As She Only Came Up To My Chest.

Signature: [REDACTED]

Signature witnessed by: [REDACTED]

2015

RESTRICTED (when complete)

93



RESTRICTED (when complete)

MG11(CONT)

Crime Number: 206W/256852A | 16

Page No. 2 of 3

Continuation of Statement of: [REDACTED]

She Also Has A Pale Complexion. The Next Thing I Knew Was That The Woman who Appears To Be Around Twenty Five Years Of Age Was Pulling Me Towards Her And Asking Me To Come To A Room. I Told My Dad And It Tasted Funny To Me I Would Have Put My Dainn Back On The Bed Whilst I Was Talking To The Woman.

The Woman Persuaded Me To Go With Her And I Cannot Remember If I Took The Dainn With Me. It Was In A Tall Straight Glass And I Would Have Drunk Some Of It But Not All Of It.

I Can Recall Walking With The Woman But I Felt Unsteady And My Feet. I Could See Her In Front Of Me But Things Were A Bit Of A Blur But I Can Recall The Woman Always In Front Of Me. I Could Feel My Self Moving From Side To Side With The Woman Guiding Me. I Know That We Did Not Go Up Any Stairs But Walked Along Enough In A Straight Run. After This Point I Cannot Remember Any Thing Until I Found Myself At Penns Bury Perennium Centre In A Cell Having Been Arrested By The Police.

I Was Released The Next Morning At Around 1130HRS And Was Picked Up By My Mother. I Went Home And Had A Bath And Due To The Injuries I Found That I Now Had. I Went To City Hospital Where I Was Treated A Broken Eye A Dislocated Left Shoulder Which The Hospital States Has Slightly Moved Out Of IT Suffer Bruising On My Skull In Several Places Which Is Still Pain Ful. I Also Have A Number Of Bruises Down

Signature: [REDACTED]

Signature witnessed by: [REDACTED]

2013

RESTRICTED (when complete)

(94)



RESTRICTED (when complete)

MG11 (CONT)

Crime Number: 20B01256852A

Page No. 3 of 3

Continuation of Statement of: [REDACTED]

Both My Legs To My Feet Which I Did Not Have When I First Went Out I Also Have A Number Of Stretch Marks On My Back As If I Had Been Pulled Across The Ground. I Am Currently Taking Pain Killers For My Injuries. And would like to state that I have asked for a Blood Test at City Hospital To See If I Have Anything In My System On That Night As I Believe That My Drink Was Spiked With Something.

I Have Also Found Out That I Had A Receipt In My Pocket For Two Payments At Leg's II. Those Being For £1.00 And £165.00. I Do Not Recall Making Or Authorising Those Payments I Have Since Spoke With The Branch Unit At Barclays Bank And They Have Confirmed That The Transactions Were Done On My Card. The Date On My Statement Shows The 28/12/16 But I Can Confirm I Was In Leg's Club On The Evening Of 23rd December And Into The Morning Of 24th December 2016. I Cannot Recall Making Those Transactions.

I Wish To Make A Complaint Regarding Being Assaulted At Some Point Between Entering Leg's Club And And Being Attacked By The Police And Also The Theft Of £1265.00 From My Bank Account By Using My Barclays Debit Card On The Evening Of 23/12/16. I Have Had The Personal Victims Statement Returned To Me And At This Time I Do Not Wish To Make Any Further Comment.

Signature: [REDACTED]

Signature witnessed by: [REDACTED]

2013

RESTRICTED (when complete)

95

2005W/258520111

Account Entries

23 entries found

22 transactions found from last statement date to 28/12/2016 limited by: Entry all

Please note, not all transactions may be shown as there is a limit to the number we store online.

BBAOVDRFT

2,432.97

Search for transactions

Find by keyword

23 row(s)



Please search

Date	Description	Money out	Money in	Available Balance
25/11/2016 Fri	BALANCE FORWARD			£ 4,407.04
28/11/2016 Mon	200782 27NOV 17.09	£ 150.00		£ 4,107.04
28/11/2016 Mon	200782 25NOV 21.38	£ 150.00		N/A
01/12/2016 Thu	CLUBWISE	£ 29.95		£ 4,077.09
02/12/2016 Fri			£ 294.28	£ 4,371.37
05/12/2016 Mon	CANCER RESEARCH U	£ 10.83		£ 4,180.00
05/12/2016 Mon	BARCLAYS BANK PLC	£ 110.54		N/A
05/12/2016 Mon	200782 04DEC 20.27	£ 70.00		N/A
06/12/2016 Tue	SKY DIGITAL	£ 30.00		£ 4,150.00
07/12/2016 Wed	200782 06DEC 19.48	£ 250.00		£ 3,900.00
08/12/2016 Thu	CARDTRONICS UK LTD	£ 10.00		£ 3,890.00
09/12/2016 Fri			£ 294.28	£ 4,184.28
	200782 11DEC 21.35	£ 50.00		£ 4,134.28
14/12/2016 Wed	200782 13DEC 18.50	£ 300.00		£ 3,834.28

96

15/12/2016 Thu	LINK	£ 300.00	£ 3,159.41
15/12/2016 Thu	LINK	£ 300.00	
15/12/2016 Thu	VODAFONE LTD	£ 74.87	N/A
15/12/2016 Thu	200782 14 DEC 20.04	£ 300.00	N/A
16/12/2016 Fri		£ 294.28	£ 3,433.69
19/12/2016 Mon	CARDTRONICS UK LTD	£ 10.00	£ 3,403.69
19/12/2016 Mon	200782 18 DEC 11.07	£ 40.00	N/A
23/12/2016 Fri		£ 294.28	£ 3,697.97
28/12/2016 Wed	LEGS 11	£ 1,100.00	£ 2,432.97
8/12/2016 Wed	LEGS 11	£ 165.00	N/A

Items per page: 40

1 - 23 of 23

Companies House

BETA This is a trial service — your [feedback \(https://www.research.net/r/chbeta\)](https://www.research.net/r/chbeta) will help us to improve it.

Search for companies or officers

CLEAR BLUE SKY THINKING LTD

Company number **07065775**

- [Officers](#)
- [Persons with significant control \(https://beta.companieshouse.gov.uk/company/07065775/persons-with-significant-control\)](https://beta.companieshouse.gov.uk/company/07065775/persons-with-significant-control)

Filter officers

☐

Current officers

Apply filter

2 officers / 0 resignations

TAYLOR, Sidney John

Correspondence address [REDACTED]

Role Active **Director**

Date of birth [REDACTED]

Appointed on **4 November 2009**

Nationality **British**

Country of residence **England**

Occupation **Director**

TAYLOR, Thomas Winston

Correspondence address [REDACTED]

Role Active **Director**

Date of birth [REDACTED]

98

Appointed on **23 November 2012**

Nationality **Irish**

Country of residence **England**

Occupation **None**

99

Companies House

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Search for companies or officers

TAKE IT BACK LIMITED

Company number 08048966

- Officers
- Persons with significant control (<https://beta.companieshouse.gov.uk/company/08048966/persons-with-significant-control>)

Filter officers

Current officers

1 officer / 0 resignations

PARMA, Daniel

Correspondence address 193-194, Broad Street, Birmingham, England, B15 1AY

Role Active Director

Date of birth [REDACTED]

Appointed on 27 April 2012

Nationality British

Country of residence England

Occupation Director

100

Companies House

BETA This is a trial service — your feedback (<https://www.research.net/r/chbeta>) will help us to improve it.

Search for companies or officers

TAKE IT BACK LIMITED

Company number 08048966

Registered office address

193-194 Broad Street, Birmingham, B15 1AY

Company status

Active

Company type

Private limited Company

Incorporated on

27 April 2012

Accounts

Next accounts made up to 30 April 2017

due by 31 January 2018

Last accounts made up to 30 April 2016

Confirmation statement

Next statement date 27 April 2018

due by 11 May 2018

Last statement dated 27 April 2017

Nature of business (SIC)

- 56301 - Licensed clubs

101

NetReveal Document Extract

Document Type: Action Fraud Relationship

Document: 18445560026 Source Reference: NFRC170301772431

102

Document: 18445560026[Back to top](#)
18445560026**Action Fraud Crime Document (Task
Reference 1.845E10)****Action Fraud Record**

Fraud ID -5246823
Fraud CRN NFRC170301772431
Fraud Type NFIB5A - Cheque, Plastic Card and Online Bank Accounts (not PSP)
Fraud Report Date 2017-03-09T15:51:21.100
First Contact Method 4190 - Other
Caller Type 6 - I am reporting a fraud that happened to someone else
Enabler Present 1
Fraud Additional Information CNXG147 Was in Birmingham last week on 3.3.17 for a Stag Do and went to a lap dancing club called Legs 11 . Now victim has discovered that there has been 9000 applied to his credit card. Victim has been in touch with the card company Barclay's to make them aware .Barclay's have said that there was 6 transactions made to the lap dancing club coming to almost 9000. Victim does not know how this has happened, victims friend has also had his credit card maxed out. Victims and his friend have been feeling really unwell since then, victims friend thinks they may have been spiked .Victims friend has taken a drugs test and has tested positive for a methadone substitute and this is not something either of them would take. Credit card company say they will look into this but have not yet said whether victim will be reimbursed. The club is in the centre of Birmingham and CCTV should be available .Advised victim to tell his friend to make a report.
First Contact Date 2017-03-03T00:00:00
Reported Other Org Reference Barclays Card
Demographic Source Of Awareness 307 - Police
Demographic Ethnic Origin 4218
Demographic Gender 283 - Male
Amount Given £9000.00
Amount Recovered £0
Clear period start date 09/03/2017
Disposal date 08/03/2023

103

Suspects**Suspect - 1**

Address Line 1 Legs 11
Address City Birmingham
Address Country 1593 - England

Victims**Victim - 1**

Person Title 324 - [REDACTED]
Person First Name [REDACTED]
Person Last Name [REDACTED]
Person Date of Birth [REDACTED]
Address Line 1 [REDACTED]
Address City [REDACTED]
Address Country [REDACTED]
Address Postcode [REDACTED]
Contact Details Preferred Method 124 - [REDACTED]
Contact Details Email [REDACTED]

Transfers**Transfer - 3**

TransferType ID3

Transfer - 2

TransferType ID2

Transfer - 1

TransferType ID1

104

Date 27 June 2017
Our Reference 019397.0003/APK SVR
Your Reference



Chief Clerk
Wolverhampton Magistrates' Court
North Street
Wolverhampton
WV1 1RA

by email only: Bc-12wolverhampton@hmcts.gsi.gov.uk

Aylesbury House
17 - 18 Aylesbury Street,
Clerkenwell Green
London EC1R 0DB

T: 020 7702 5331 (office hours)
T: 076 5913 8106 (emergencies)
DX: 53346 Clerkenwell
F: 020 7253 1367
E: mail@hickmanandrose.co.uk

Dear Sir/Madam

Search warrant issued on 16 June 2017 under s.23 Misuse of Drugs Act 1971
Premises: Legs 11 193-194 Broad Street Birmingham B15 1AY
Our client: Daniel Parma

We write in respect of the above warrant, which was issued by a Justice of the Peace on 16 June 2017, on application made on behalf of West Midlands police by DC Gebhard. We are instructed by the licensee of the premises.

So that we may understand the basis on which this warrants was sought and granted (together with reasons for the court's decision)¹, we ask that you provide us with:

- i) an entire copy of the application form, together with any other documents relied on by the police in support of the application; and
- ii) any notes prepared by the court clerk and/or the district judge during the hearing

We look forward to hearing from you and would be grateful if a response could be provided by no later than 4 July 2017.

Yours faithfully

Hickman & Rose

HICKMAN AND ROSE

¹ See also the decision in *R (on the application of Cronin) v Sheffield Justices* [2003] 1 WLR 752

Partners: Ben Rose, Ross Dixon, Daniel Machover, Jenny Wiltshire, Andrew Katzen, Kate Maynard, Beth Handley, Aileen Colhoun, Stefano Ruis, Charles Kuhn

Consultant: Jane Hickman

Associates: Steffan Baker, Peter Csemiczky, Christopher Houssemaine du Boulay, Emily Sheils, Helen Stone, Claire Wallace, Eva Whittall

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Date 27 June 2017
Our Reference 019397.3/APK SVR
Your Reference



Chief Clerk
Birmingham Crown Court
1 Newton Street
Birmingham B4 7NA

Aylesbury House
17 - 18 Aylesbury Street,
Clerkenwell Green
London EC1R 0DB

by email only: keith.langan@hmcts.qsi.gov.uk

T: 020 7702 5331 (office hours)
T: 076 5913 8106 (emergencies)
DX: 53346 Clerkenwell
F: 020 7253 1367
E: mail@hickmanandrose.co.uk

Dear Sir

Search warrants issued on 16 June 2017 under s.9 and paras 2 & 12 of sch 1 of PACE 1984

Premises: i) [REDACTED]
ii) [REDACTED]
iii) [REDACTED]
iv) Legs 11 Gentleman's Club 194-194 Broad Street Birmingham B15 1AY

Our client: Daniel Parma

We write in respect of the above warrants, each of which was issued by HHJ Creed on 16 June 2017, on applications made on behalf of West Midlands police by T/DS Chappelow.

So that we may understand the basis on which each of these warrants were sought and granted (together with reasons for the court's decision)¹, we ask that you provide us with an entire copy of each application form, assuming that a copy has been retained. In the event that the applications were made electronically, we observe that a copy of the form will be readily accessible, even if it has been deleted.

In making this request, we observe that, at page 6 of the application form for a warrant under sch 1 of PACE, the following words are printed in bold: "*Judge's decision – this record must be kept by the court*".

In the event that no copy of the form and/or record of the decision has been retained, please explain the rationale for this, as well as providing us with a copy of any court policy/guidance in respect of the same. If the decision (or any other information relating to the application) is recorded in another medium, please advise accordingly, confirming whether a copy will be provided to us.

We look forward to hearing from you and would be grateful if a response could be provided by no later than 4 July 2017.

Yours faithfully

Hickman & Rose

HICKMAN AND ROSE

¹ See also the decision in *R (on the application of Cronin) v Sheffield Justices* [2003] 1 WLR 752

Partners: Ben Rose, Ross Dixon, Daniel Machover, Jenny Wiltshire, Andrew Katzen, Kate Maynard, Beth Handley, Aileen Colhoun, Stefano Ruis, Charles Kuhn

Consultant: Jane Hickman

Associates: Steffan Baker, Peter Csemiczky, Christopher Houssemayne du Boulay, Emily Sheils, Helen Stone, Claire Wallace, Eva Whittall

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Date 29 June 2017
Our Reference 019397.0003/APK SVR
Your Reference



DC M Gebhard
West Midlands Police
Birmingham

by email only: m.gebhard@west-midlands.pnn.police.uk

Aylesbury House
17 - 18 Aylesbury Street,
Clerkenwell Green
London EC1R 0DB

T: 020 7702 5331 (office hours)
T: 076 5913 8106 (emergencies)
DX: 53346 Clerkenwell
F: 020 7253 1367
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Dear Sir

Daniel Parma - search warrants executed on 23/24 June 2017 at the following addresses:

- i) [REDACTED];
- ii) [REDACTED];
- iv) Legs 11 Gentleman's Club 193-194 Broad Street Birmingham B15 1AY

We are instructed by Mr Parma in relation to the above warrants, each of which mentioned him (together with others) by name.

In executing the said warrants, we are instructed that officers from West Midlands Police purported to seize, *inter alia*, the following items (pursuant to s.9 and paras 2 & 12 of schedule 1 of PACE):

- several quantities of uncounted cash
- PED machines
- communication devices
- business records

To our knowledge, no arrests were made as a consequence of the searches, nor was there any prohibition on the continued operation of the business activities at 193-194 Broad Street. We also understand that, although a number of staff from Legs 11 were questioned, no offences were identified. We note furthermore, that the copy search logs in our possession in respect of each of the above properties does not identify the seizure of any items believed to be controlled substances.

Enquiries made by us of both Birmingham trading standards and a Sgt Addison furthermore, have not disclosed any further grounds for suspicion or, indeed, lines of inquiry.

Given the circumstances, we now require you to set out the legal basis on which the items listed above were i) seized; and ii) continue to be retained.

In the absence of a clear legal basis for the seizure and retention, we invite you to return the items in question forthwith. In particular, we observe that the seizure of cash was not contemplated on any of the warrants. In respect of the PED machines, it remains open to you to seek to image the data in question pursuant to s.22 PACE and to return the original items.

We look forward to hearing from you by no later than close of business on Friday 30 June 2017. If we do not receive a satisfactory response by this date we will advise our client as to the legal remedies available to him and, for the time being, expressly reserve all of his rights in relation to the seized material.

Yours faithfully

Hickman & Rose
HICKMAN AND ROSE

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