

Your ref: 18/110644/LISEVR & 18/11062/LISEVR
Our ref: JS/TOM/MCK.9.3

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3 April 2019

Dear Ms Steward

**Local Government (Miscellaneous Provisions) Act 1982, Schedule 3
Sophisticats, 3-7 Brewer Street, 18/110644/LISEVR & 77 Welbeck Street 18/11062/LISEVR**

Thank you for your email dated 27 March 2019.

We understand the Licensing Authority's and Licensing Sub-Committee's position on procedure. However, we reiterate the contents of our letter dated 26 March 2019, particularly as our client's business and livelihood of persons working at the Premises may be unfairly impacted by statements made by anonymous persons and/or persons who may not be present at the 10 April 2019 hearing.

Our client needs to be given a fair opportunity to challenge the objections. Much of the factual evidence relied upon in the objections is not accepted by our client. Our client believes this evidence to be unreliable and provided by persons who are connected to Mr Warr. For instance, much of the evidence submitted by Mr Warr and Mr Nash rely upon statements made by Mrs Langer. Mrs Langer makes serious allegations against our client. These allegations are made in statement that has merely been submitted as an exhibit of Mr Nash's statement.

On 23 February 2018, Mrs Langer accepted a Police caution for Assault by Beating contrary to Section 39 of The Criminal Justice Act 1988 against her husband, Mr Langer (our client's former business partner). Mrs Langer refers to this incident in her statement. We are instructed that the full story is that Police attended the incident after Mrs Langer had reported an allegation of assault against Mr Langer. CCTV evidence demonstrated that it was Mrs Langer herself who had committed the offence and who therefore had subsequently made a false report to the police.

In the following months, our client became aware of threats made by Mrs Langer against our client and his business. The threats were of such a serious nature that our client was advised by his solicitors dealing with claims made by Mrs Langer (which have to date been unsuccessful) to instruct private investigators to undertake surveillance of her to establish the extent of any immediate threat to our client.

Mrs Langer was subsequently seen meeting Mr Nash on 5 October 2019 at Panini's Café situated at 22 Crescent W, Hadley Wood EN4 0EJ. They were recorded discussing a payment of £200,000 and, in the context of "*Soho and Marylebone*" (presumably in relation to our client's premises) Mr Nash said "*let me have the conversation with 2 people, I might be able to do them both*". Our client did not appreciate what they were discussing at the time. Our client now knows that '*the conversation with 2 people*' is likely a reference to Mr Allan Brown and Mr Kenneth Haswell. Mr Brown, a former employee of Mr Warr, visited Sophisticats Soho 6 days after the meeting, with his friend Mr Haswell; followed by another visit by the anonymous objector on 12 October 2018. As you know, Mr Brown's account and objection has subsequently been discredited and his objection withdrawn.

Furthermore, on 11 October 2018 (hours before Mr Brown's visit to our client's premises), Mrs Langer met Mr Tony Engleman at Regent's Park. Mr Engleman has a long history of operating licensed premises in London. Mr Nash also admits to knowing Mr Engleman in his second statement dated 17 February 2019. The parties discussed licensing, contracts, large payments and "*put everything in place prior to going to court*".

All these matters go to the credibility of the evidence from the objectors, anonymous or otherwise, and illustrate why, in our submission, no weight should be afforded to these objections whatsoever until at least such time as they can be tested under questioning.

We reiterate the contents of our letter dated 26 March 2019 accordingly.

Yours sincerely

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