

WITNESS STATEMENT**Criminal Procedure Rules, r. 16.2; Criminal Justice Act 1967, s.9**

URN

Statement of: **Gina McConville**Age if under 18: **Over 18** (if over 18 insert 'over 18')Occupation: **Police Constable 642**

This statement (consisting of 29 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: **Gina McConville**Date **8th May 2021**Tick if witness evidence is visually recorded (*supply witness details on rear*)

I am Police Constable 642 Gina McConville and I hold the role of Licensing Officer with Lincolnshire Police. As such I had dealings with a licenced premises, Unit 2, 20 Westlode Street, Spalding over some years, all of which is contained within this statement as they occurred under premises licence PL0337, issued by the Local Authority, South Holland District Council.

The premises first came to notice toward the end of 2018 when Lincolnshire Police received an application to transfer the existing premises licence to DELICJA SPALDING LTD and to vary the designated premises supervisor (DPS) to Diari HAMA.

On researching the individuals involved Lincolnshire Police submitted notices of objection to the applications under Section 42(6) and Section 37(5) of the Licensing Act 2003 having been satisfied that the exceptional circumstances of the case are such that granting the application would undermine the crime prevention objective.

A check of Companies House shows Delicja Spalding Ltd was incorporated in July 2018 and its sole director is Mohammad Salih ATTUF. Other checks on Companies House shows that Mr ATTUF was previously director of Euro Grocers Ltd with a registered office address of 371 Tudor Road, Leicester which is an off-licence style premises called Euro Mini Market. He incorporated the company April 2011 and resigned as director in March 2014. Diari Hassan HAMA (the proposed DPS) was appointed director of the company in June 2013 until the company was dissolved in September 2018.

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Checks with Leicester City Council revealed that Mr ATTUF became PLH and DPS of 371 Tudor Road in July 2010. Mr HAMA became DPS in November 2011 and PLH in August 2013 replacing Mr ATTUF. There was a transfer and vary DPS application to a different person in January 2018 at which point Mr HAMA was removed from the licence.

HMRC carried out disruption activity at 371 Tudor Road in February 2016. They seized 6600 non-duty/counterfeit/illicit cigarettes, which were concealed in a bread stand and 29 bottles of non-duty spirits. They documented the shop owner as Diari Hassan HAMA. HAMA stated that he was renting the shop from ATTUF (no more details given).

Euro Mini Market, 159 Fosse Road North, Leicester is another licensed premises connected to Mr ATTUF and Mr HAMA. The rate payer is listed on an undated free access Leicester directory as Euro Grocers Ltd. Further checks with Leicester City Council have shown that Mr ATTUF is DPS and PLH of that premises and has been since the premises licence was first granted in July 2013.

Trading Standards have recorded that in September 2015 Marlboro foreign labelled (non-duty paid) cigarettes were purchased for £5 from 159 Fosse Road North. In October 2016 information was received that illicit cigarettes were being sold from the premises. Police systems show that Mr HAMA called in a theft from this location in March 2017 and presented himself as the owner.

Lincolnshire Police believed this information shows there is a clear history of Mr HAMA and Mr ATTUF working together over a long period of time in at least two licensed premises. Both of these premises have been involved in criminality at a time when both the individuals (who are applying for a position of responsibility on a premises licence in Spalding) held a position of responsibility on the premises licences at these locations. Both of these premises either sold or have been found in possession of contraband - an offence under Section 144 Licensing Act 2003, smuggled goods on licensed premises.

Lincolnshire Police requested that the applications be refused.

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On 29th November 2018 a hearing was scheduled to take place to hear both applications. The Vary DPS application was withdrawn on the morning of the hearing and transfer hearing went ahead. The transfer was refused by South Holland Licensing Sub-Committee.

In January 2019 Lincolnshire Police received an application to transfer premises licence PL0337 at Unit 2, 20 Westlode Street, Spalding. This time to Dawid GLAZIK. Again Lincolnshire Police researched the individual and due to the information found submitted an objection under Section 42(6) of the Licensing Act 2003, being satisfied that the exceptional circumstances of the case are such that granting the application would undermine the crime prevention objective.

The grounds for the objection notice were as follows:

South Holland District Council area has had an unprecedented number of premises licences revoked due to illicit/counterfeit/smuggled (illegal) tobacco, and along with this smuggled alcohol, tax avoidance in relation to declared sales, staff being paid below minimum wage and poor compliance in relation to the premises licence is often found.

A check of Companies House shows that Mr GLAZIK is an active director of 3 companies. Euro Market (UK) Ltd, with a correspondence address of 1 Church St, Wellingborough, Northamptonshire was incorporated in September 2014 by Dorota GLAZIK, she resigned in October 2016 at the same time Mr GLAZIK was appointed director. Checks have shown that Ms GLAZIK lives at the same address as Mr GLAZIK and that they are married. 1 Church Street is a licensed premise and operates as an off-licence/convenience type store. Mr GLAZIK became premises licence holder and designated premises supervisor in November 2014 and remained in those positions until June 2018 when another person became DPS. Mr GLAZIK remains premises licence holder as of 16th January 2019.

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In October 2014 0.5 litres of foreign labelled Vodka with no-duty stamp was found on the premises and voluntarily surrendered by the owner, Ms GLAZIK. Store manager at the time was documented as Mr GLAZIK.

In November 2014 council officers visited the premises and found 25 packets of foreign branded cigarettes under the counter and seized them.

In June 2015 Trading Standards conducted a test purchase at the premises, and were able to buy two packets of foreign labelled Marlboro Gold for £10.

A warrant was executed in July 2015 by Police and Trading Standards, a male was seen running out the rear of the shop with a black holdall, he didn't stop as requested and officers were unable to locate him.

In 2017 there were 3 separate pieces of intelligence regarding the sale of illegal cigarettes from the premises.

Northamptonshire Police and Council Licensing officers visited the shop on 4 occasions in 2018 due to staff selling alcohol to street drinkers who are drunk. The problems were pointed out and advice was given. Local officers then verbally warned staff immediately after one sale, and issued a penalty notice following a sale on another occasion. There has been inconsistency from Mr GLAZIK as when first approached about the issue he stated he had sold the business, and then he stated he hadn't.

Euro Gym Ltd, correspondence address of 230 Narborough Road, Leicester, was incorporated in July 2016 and Mr GLAZIK has been a director since this time. This premises is a gym come health club, with weights, hot tubs, a sauna and also sells sports supplements. It used to be a supermarket but its premises licence was cancelled in November 2016 and it remains unlicensed.

A positive test purchase of one packet of counterfeit Marlboro Gold was made from this address in May 2017 as reported by test purchasers from the tobacco industry.

Euro Market Leics Ltd, with a correspondence address of 42 Frolesworth Road, Leicester (home address of Mr GLAZIK) was incorporated in September 2015 at which time Mr GLAZIK was appointed

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the sole director. When this company was initially registered it had the correspondence address of 31-33 Narborough Road Leicester, which changed to the Frolesworth address in October 2016. 31-33 Narborough Road is a licenced premise and operates as an off-licence/convenience type store. In December 2012 Euro Market Leics Ltd became the premises licence holder at that address and remained so until it was transferred in January 2018.

On 26th and 27th September 2017 Leicester City Council and Her Majesty Revenue and Customs (HMRC) visited the above premise as part of an operation into illegal cigarettes. A total of 900 illegal cigarettes were found hidden in the rear store room and were seized by HMRC. Staff members present at the time had no concept of the Licensing Act and had never heard of the DPS who was named on the licence; it later transpired that he had left the role in June 2016. The staff contacted Mr GLAZIK, however he was unable to attend prior to the officers leaving.

A check of Companies House as of 16th January 2019 shows Delicja Spalding Ltd, with the correspondence address of Unit 2, 20 Westlode Street, Spalding was incorporated in July 2018 and its sole director is Mohammad Salih ATTUF. Lincolnshire Police previously objected to the transfer of the Delicja premises licence to Delicja Spalding Ltd due to Mr ATTUF'S connections to premises where illegal tobacco products were bought or discovered.

Enquiries with Mr GLAZIK during the consultation period for this application have led Lincolnshire Police to believe that Mr GLAZIK is not responsible for the business at Unit 2, Westlode Street. Mr GLAZIK has confirmed by email (using [REDACTED]) that he has been appointed as the manager at the premises as of 1st January 2019, he is employed by Mr ATTUF, and he does not have a vested financial interest in the business. The lease is in the process of being put into Mr ATTUF'S name, and any bills will be in the company name Delicja Spalding Ltd.

Section 16 (1) (a) Licensing Act 2003 states who can apply for a premise licence 'a person who carries on, or proposes to carry on, a business which involves the use of the premises for the licensable activities to which the application relates'. Mr GLAZIK is an employee and does not have a propriety

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interest in the business and therefore lacks the ability to fully control the business, he is not the person responsible for 'carrying on a business'.

A manager of a licensed premise would normally hold the position of DPS. Mr GLAZIK does hold a personal licence with Leicester City Council and so has the qualification to fulfil this role, however this role has not been applied for. With the evidence Lincolnshire Police have now discovered future applications for this role or that of PLH within premises in Lincolnshire would be robustly objected to.

Lincolnshire Police believes that the evidence shows that there are some serious concerns with Mr GLAZIK. There is documented poor management of staff and paperwork with regards to responsibilities under the Licencing Act and he has held responsible positions be it director or PLH within licenced and non-licensed premise when illegal cigarettes and smuggled alcohol have been discovered or sold.

Lincolnshire Police requested that the application be refused. The application was withdrawn prior to hearing.

In April 2019 Lincolnshire Police received another transfer application for PL0337, this time to Mr Mohammad Salih AFFUF as an individual rather than a company of which he is director of. Using the information found during the previous applications and further information to objected to the transfer under Section 42(6) of the Licensing Act 2003 and being satisfied that the exceptional circumstances of the case are such that granting the application would undermine the crime prevention objective, requested that the application be refused.

The additional information was the following. Lincolnshire Police completed a data protection request and submitted it to Leicester City Council requesting information on the dates Euro Grocers Ltd paid the rates at 159, Fosse Road North, Leicester. Lincolnshire Police also asked if Euro Grocers Ltd is or were responsible for paying the rates at any other premises in Leicester City Councils area.

Lincolnshire Police received the information back from Leicester City Council on Wednesday 24th April 2019.

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It detailed that Euro Grocers Ltd was liable for paying the rates at 159 Fosse Road North, Leicester, LE3 5EZ for the period 03/04/2013 to 19/03/2017, and at 371 Tudor Road, Leicester, LE3 5JJ for the period 01/07/2013 to 13/11/2017.

Lincolnshire Police then requested who the responsible bill payers were after this time.

Information then came back that after this period and still liable for rates at 159 Fosse Road North, Leicester is Mr ATTUF, he gets a 100% small business rates relief, so does not have to make any payments. He is liable and paying council tax there.

Neither Mr HAMA or Mr ATTUF or any company that they are directors of is the current responsible bill payer at 371 Tudor Road, Leicester.

These dates are significant as although Mr ATTUF resigned as director of Euro Grocers Ltd in March 2014, Euro Grocers Ltd carried on paying the rates at 159 Fosse Road, where Mr ATTUF is the premises licence holder and designated premises supervisor (since July 2013 until present) up until it stopped paying the rates in March 2017. Euro Grocers Ltd were the rate payers when illegal cigarettes were purchased in 2015. Mr HAMA was director of the company during this time. This shows a long and ongoing connection to Mr HAMA and Euro Grocers Ltd.

Also significant is that Euro Grocers Ltd were paying the rates at 371 Tudor Road, Leicester, LE3 5JJ for a similar period to that at 159 Fosse Road. During this time illegal cigarettes and smuggled alcohol was found at the premises.

To summarise, Mr ATTUF was the premises licence holder and designated premises supervisor of a premises when illegal goods were purchased. During this time Euro Grocers Ltd paid the rates and Mr HAMA was the director. Euro Grocers Ltd also paid the rates at another premises where illegal cigarettes and smuggled alcohol were found. Mr HAMA was documented as the owner at the time and Mr ATTUF as the landlord, Mr HAMA was also the director at the time. This shows that Mr ATTUF, Mr HAMA and Euro Grocers Ltd are connected to both premises during the times illegal goods were either bought or found.

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On 1st May 2019, at hearing, the Licensing Sub-committee granted the transfer, making Mr ATTUF premises licence holder of PL0337 at Unit 2, 20 Westlode Street, Spalding.

Lincolnshire Police attended Delicja, Unit 2, 20 Westlode Street, Spalding on 18th July 2019 to carry out a compliance check. The check uncovered the following issues:-

Non-compliance in regards to the premises licence conditions. The CCTV was found to be recording from the 23rd June - giving 26 days of footage – not 28 days as stated in the Annex 2 condition on the premises licence. The shop manager (not the designated premises supervisor or premises licence holder) did not know how to work the CCTV system. The system was in a cupboard behind a door which was blocked by boxes of produce. There was no mouse in place to be able to operate the system, one had to be sourced. There was no camera providing a facial view of customers at the tills.

The refusals log only had one refusal, dated 2/3/18, it did not appear to have been audited by the designated premises supervisor as stated in the Annex 2 condition.

Non-compliance with premises licence conditions is an offence under Section 136 Licensing Act 2003 – unauthorised licensable activity, thereby carrying out unauthorised licensable activity each time alcohol is sold.

Cans of beer were offered for sale without a price being displayed. The Price Marking Order 2004 states that there must be a clear selling or unit price, which is easily identifiable without having to ask the trader. Beer cans were found to be put through the till at one price, then discounted by the sales assistant to a price which in one case was only 7p above the mandatory price (duty plus VAT). A can of 500ml 7.6% ABV Perla Black has a mandatory, duty plus VAT price of £1.13 – this is the price of the tax alone. Its price when put through the till showed £1.79, however it was sold for £1.20 after being discounted. This means that that 7p cost includes production costs of the fluid, the production costs of the can, transportation costs, profits for each process of the chain and the tax on those profits for it to be

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a worthwhile line. This is highly unlikely and more than likely smuggled good. Leading to the suspicion of smuggled goods on licensed premises – an offence under Section 144 Licensing Act 2003.

Medicines were found being offered for sale which had no English labelling in their original packaging. It is an offence to knowingly sell or offer for sale medicine without English on the original packaging, contrary to Regulation 269 of The Human Medicines Regulation 2012. Some of this medication was found to be prescription only. There by putting the public at serious risk.

A worker within the premises who was witnessed selling items to customers was found to have had no right to work. CCTV was checked and showed him working within the premises, carrying out various tasks over the previous few weeks. This CCTV was recorded and made available to view should this have been disputed.

It is an offence to employ an illegal worker under Section 21 of the Immigration, Asylum and Nationality Act 2006, as amended by section 35 of the Immigration Act 2016, if the employer knows or has reasonable cause to believe that they are employing an illegal worker. The employer by law has to carry out various checks to ensure that their staff are legally allowed to work.

During a test purchase operation on 13th August 2019 a worker from the premises sold alcohol to a child. Section 146 of the Licensing Act 2003 prohibits the sale of alcohol to individuals under 18 years of age.

Lincolnshire Police sent a letter to Mr ATTUF on 16th August 2019 requesting information regarding the illegal worker, invoices for the beer and the medicines, copies of the refusals register and evidence of staff training. An email was then received containing some information requested and this was followed up by a letter and invoices which arrived in the post. No information was received about staff training or refusals register. Please note some of the invoices are addressed to Mr Diari HAMA at the Delicja address. One is addressed to Diari Hassan at Euro Grocers Ltd, 371 Tudor Road, Leicester. Lincolnshire Police had concerns with Diari Hassan HAMA and 371, Tudor Road and this premises as mentioned in 3 objections submitted by Lincolnshire Police.

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Lincolnshire Police submitted a review of the premises licence application under Section 51 Licensing Act 2003 using the above information from the 18th July 2019 visit and the subsequent failed test purchase requesting that the Licensing Sub-Committee seriously consider a revocation of the premises licence due to undermining the licensing objectives.

The review hearing was held on 28th November 2019 and the premises licence was revoked then appealed.

However, prior to that, in the interim period between the serving of the review paperwork and the hearing Lincolnshire Police received yet another application to transfer the premises licence, this time to Aram SALAH. Yet again the individual was researched and enough evidence obtained to object to the transfer under Section 42(6) Licensing Act 2003, being satisfied that the exceptional circumstances of the case are such that granting the application would undermine the crime prevention objective.

The grounds for this objection were are as follows:

Delicja is a premises whose licence Lincolnshire Police has applied to be reviewed due to non-compliance, illegal working, and concerns in relation to beer pricing.

Mr SALAR has a history that is concerning to Lincolnshire Police, so much so that along with the history of Spalding and it's issue surrounding illegal tobacco sales believe that the exceptional circumstances apply and that granting the application would undermine the crime prevention licensing objective.

A Swindon Advertiser newspaper article dated 21st June 2017 documents charges being dropped against a shop keeper who went on the run for five years. It states Aram SALAR formerly of Roseberry Street, had fled the county while the council were investigating his dealings at a Manchester Road shop. He was due to appear at Swindon Crown Court in October 2012 facing a charge of breaching a trademark and another for money laundering. He failed to attend, a warrant was issued and he was

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arrested when re-entering the county in June 2017. He was placed before the court and due to the council now offering no evidence, due to witnesses having left the services of the council and other difficulties a not guilty verdict was entered on the two counts. Mr SALAR was sentenced to 2 months imprisonment for failing to surrender to custody. The article goes on to say that it is alleged that Mr SALAR was the manager of a shop called Istanbul on Manchester Road when the alleged offences took place.

Enquiries with Trading Standards has shown that in July 2011 a joint enforcement visit was conducted at Istanbul Market, 123 Manchester Road, Swindon. Non-duty paid and foreign-labelled tobacco was found in the store cupboard. Mr Aram SALAR (with the same date of birth as the applicant) is described as the owner, he states he had been running the business for a month and had previously owned a shop in Leicester. Mr SALAR said the tobacco wasn't his and he didn't know where it came from. At the time the premises was visited it was licensed, the holder of that licence wasn't Mr SALAR. Mr SALAR stated that he rented the shop off the premises licence holder and that he (the premises licence holder) no longer had anything to do with the business.

In February 2012 a quantity of foreign labelled cigarettes and tobacco were found under the floorboards of Roseberry Street, the home address of Aram SALAR (as confirmed by the information provided by Trading Standards and confirmed as home address on the Police National Computer). Mr SALAR and another were arrested.

Lincolnshire Police believed that the evidence shows that there are some serious concerns with Mr SALAR and that if the transfer is granted the prevention of crime licencing objective will be undermined. He was in charge of a premises when illegal tobacco products were found. The premises was licenced, Mr SALAR was in control but not the premises licence holder. Some months later illegal tobacco products were then found stored at his home address under floor boards. Mr SALAR then failed to attend Court and left the country for a number of years. When he did return he was sentenced to 2 months imprisonment for failing to surrender.

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Lincolnshire Police requested that the Licensing Sub-Committee reject the application as it is necessary for the promotion of the crime prevention objective.

The hearing went ahead on 14th November 2019 and the transfer was refused, meaning the premises licence was back with Mr ATTUF (transfer applications are usually ticked in the box 'with immediate effect' meaning it is in the new persons hands until the committee make a decision on it, then if refused it reverts back to the previous remises licence holder).

As stated above the review hearing was then held on 28th November 2019 with Mr ATTUF as premise licence holder due to the refusal of the transfer and the premises licence was revoked then appealed.

It is a well-known practice to apply to transfer premises licences once review paperwork is served or expected and the licence placed in jeopardy. With an attempt to argue, new owner, new business, not responsible for past failings at review hearing. However, with some research into links to the previous licence holder and asking for evidence of actual purchase, lease, bills etc, it is often possible to prove that the original licence holder is still involved with the business in the background and a genuine purchase of the business has not taken place. The issue comes with time limits involved with transfers as the Police have 14 days to find that evidence once the application is received and are often relying on sources and partners in other parts of the country to provide it on time.

Lincolnshire Police received yet another application to transfer the premises licence, again to Aram SALAH in December 2019 along with a vary DPS application again in SALAH'S name. Using the same information as previously used on the last objection to SALAH Lincolnshire Police object to the transfer under Section 42(6) Licensing Act 2003, and the vary DPS under Section 37(5) being satisfied that the exceptional circumstances of the case are such that granting the application would undermine the crime prevention objective. Lincolnshire Police requested that the application be refused. The hearing was set for 9th January 2020. Days before the hearing, the applications were withdrawn, meaning Mr ATTUF

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was again the premise licence holder, and the DPS, the individual who was meant to be in day to day control of alcohol sales was Mr Dairy Sleman JALAL the PLH and DPS from June 2018 who happened to remain as DPS as others were refused, yet who the Police had never met on all the visits to the premises or at any of the hearings.

In February 2020 Lincolnshire Police received a new premises licence application for Unit 2, 20 Westlode Street, Spalding with the applicant being Milena KUDRACOVA. PL0337 was still in place albeit revoked and appealed against. As with all the other application the individuals applying are thoroughly looked into as is the business purchase and the details given confirmed.

Ms KUDRACOVA spoke with Lincolnshire Police prior to applying as she was concerned about the history of the premises. She was informed of its history and the recent revocation and was told that due to this if she was to apply then her background and associations would be rigorously checked, as there is a common theme with premises who have had their licences revoked that the proposed new owner/licence holder is not independent and although the paperwork has changed it's business as usual within the premises and the same people involved previously are still in the background.

The premises licence application was then received and Lincolnshire Police spoke with Ms KUDRACOVA over the phone. She stated that she had previous retail experience in licenced premises as she worked for 3 years in Kabus, Clayton Road, Bradford, with her boss being Alan HASSAN. She was asked to provide evidence that Delicja was a genuine business purchase, including lease agreement, evidence of money movement, Companies House paperwork, updated suppliers, utilities bills, business rates, food registration etc. She stated she hadn't got this sorted yet, but would do so in the near future and will email the paperwork to Lincolnshire Police. No email was forthcoming.

Checks were made into the information given. Kabus was found to be at 18 Clayton Road, Bradford. Alan HASSAN is understood to be Alan Hassan SHARIF born [REDACTED]. He was the premises licence holder and designated premises supervisor at 18 Clayton Road from 15/4/15 to 11/12/16. A test

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purchaser was sold illicit cigarettes there on 27/10/15 and this was followed up by a visit on 29/10/15 by West Yorkshire Trading Standards and West Yorkshire Police. Illicit tobacco was found hidden under the counter and within a built in secret compartment in the wall of the store room. Over 5000 illicit cigarettes were seized along with 1.4kg of hand rolling tobacco. Out of date fresh food was also on display.

Checks also showed that Alan Hassan SHARIF is currently the premises licence holder and designated premises supervisor of Bila Mini Market, 168 Clayton Road Bradford. He has held those positions from 5/1/17 until now (date of representation submission). A sale of counterfeit cigarettes was made to a child on 29/2/20.

Checks with Immigration confirmed that Milena KUDRACOV and Alan Hassan SHARIF are husband and wife, having married around 2006 (later transpired to be a religious ceremony in 2005 as opposed to legal marriage under UK law, which they applied for in 2006 but which was refused, then then applied again in 2009 and it was granted, however the legal marriage didn't seem to take place).

City of Bradford Metropolitan District Council, who holds Mr SHARIF'S personal licence, confirmed that Mr SHARIF changed his name in November 2017 to Omar Qadir SALEH.

Checks into this new name were then made.

Leicestershire Trading Standards encountered Omar Qadir SALEH on 27/6/19 during a visit to Fresh Market, 60 Leicester Road, Wigston, Leicestershire. During the visit 5 pouches of hand rolling tobacco and 2 x packets of counterfeit Mayfair were seized as well as various documents, one of which was a payslip dated 4/1/08 addressed to Milena KUDRACOVA.

Leicestershire Trading Standards visited the business again on 9th January 2020 during which a large amount of tobacco was found in a concealment, since that visit the business has ceased trading.

Oadby and Wigston Borough Council, whose area 60 Leicester Road, Wigston, Leicester is in, have confirmed that the premises is licensed. As of 17th June 2019 Mr Alan Hassan SHARIF has held the

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position of premises licence holder and designated premises supervisor at that premises, and he continues to do so even though the premise is no longer trading.

Myself and Sgt 1040 ENDERBY attended Delicja, Unit 2, 20 Westlode Street, Spalding on Friday 13th March 2020 and spoke with Milena KUDRACOVA. She presented an asset purchase agreement between herself and Aram SALAR (understood to be the previous business owner) to show the purchase of the business, although she admitted that no money had been exchanged, and it wouldn't until she had obtained the premises licence. Although not dated, it was signed and she stated that they had signed it that day. She was unable to provide a lease, Companies House paperwork, utility bills, updated suppliers information, council tax, food registration etc. Ms KUDRACOVA again explained her retail history in Bradford, and that Delicja is going to be renamed Bila, with the planned company name being SK UK Bila, once registered on Companies House (shown dissolved as of 21st April 2021). She explained that the shop is going to be a family business that her husband is going to be involved in. She said he had no experience of working in licensed premises so she was going to train him. She stated that she had moved to the area with her husband and 2 children and they are soon to be settled in school. When asked her husband's name and date of birth Ms KUDRACOVA stated Omar QADIR, born 1/2/75

I then read out to Ms KUDRACOVA the bold wording under the checklist on the final part of the premises licence application. It states 'It is an offence, under section 158 of the Licensing Act 2003, to make a false statement in or in connection with this application. Those who make a false statement may be liable on summary conviction to a fine of any amount'. She was then asked if all the information she's provided in regards to what we'd spoken about was the truth or if she wanted to amend anything. She stated it was the truth.

Checks at the time with the building owner for Unit 2 Westlode Street, Spalding have confirmed that they have had the same tenant for Delicja since July 2016 (a previous licence holder). They have not transferred, permitted or underlet the property, nor had any approach from the tenant to request similar.

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Lincolnshire Police are aware that Ms KUDRACOVA is presenting as the forth individual to own the business since the current tenant named on the lease.

Lincolnshire Police believes that the evidence presented strongly suggests that on the balance of probabilities that Ms KUDRACOVA is aware and has been complicit with her husband's criminality. It suggests that she has deliberate concealed this history, and has not been truthful in her dealings with Lincolnshire Police. Mr SHARIF/SALEH'S history with licenced premises it is of great concern and by Ms KURDACOVA'S own admission he is to have involvement at Delicja, as it is a family business. It's of no coincidence that the last licenced premises involving Mr SHARIF/SALEH, where illicit tobacco products were found ceased trading in mid-February 2020, around the time this application was received. Lincolnshire Police believed the evidence presented strongly suggests that the licencing objectives of prevention of crime and disorder, public safety and protecting children from harm will be undermined should this licence be granted and therefore Lincolnshire Police requested that this premises licence application be refused.

On 17th April 2020 a hearing for this new premises licence application was held and it was refused.

Within days of this refusal another two applications came in to transfer PL0337 to Milena KUDRACOVA and to vary the DPS to her too. Lincolnshire Police used the information gained for the representation to the new licence application plus information gained during the hearing to object to the applications under Section 42(6) and 37(5) of the Licensing Act 2003 having being satisfied that the exceptional circumstances of the case are such that granting the application would undermine the crime prevention objective.

Lincolnshire Police explained in the objections that history of the premises licence this transfer relates to is an extensive one, Lincolnshire Police have repeatedly objected to either individuals or companies owned by said individuals being the licence holder due to links to criminality, namely the sale of illicit tobacco products. Within a few months of the licence finally being granted to an individual Lincolnshire

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Police had objected to, he was discovered to be employing an illegal worker, selling illegal medicines, selling alcohol to children and to those under 25 without the necessary ID checks, and non-compliance with the premises licence conditions. The premises licence was revoked in November 2019, it was appealed and that appeal is still ongoing, hence the ability to transfer, which this objection relates to.

Lincolnshire Police then went on to give the previous information on Ms KURACOVA with the additional information of.

Checks with Immigration showed that Mr HASSAH (SHARIF/SALEH) applied for a Certificate of Approval for Marriage (needed due to his Immigration status at the time) to Ms KUDRACOVA in 2006, but was refused as he didn't meet the requirements. He applied again in 2009. Following an enquiry by Immigration on 10/03/2009 in relation to that application Milena KUDRACOVA and Alan Hassan SHARIF'S representation submitted affidavits for the applicant (HASSAN) and sponsor (KUDRACOVA) that stated they first met in 2004, and they decided to get married in 2005. Under 'wedding arrangement details if any' they stated they had a religious ceremony in 2005. The 2009 application was approved. At the previous hearing for the new licence Ms KUDRACOVA stated she had never been married. The 2009 application indicates their religious ceremony in 2005 wasn't a legal UK marriage ceremony.

At the hearing for the new premises licence Ms KUDRACOVA stated that she wasn't married and had never been married and that she was no longer in a relationship with Mr Saleh. They were in a relationship, he is the father of her two children, however her last dealings with him were in 2015 when he signed to say that he was the father of her youngest child. She stated that they had no business relationship, they have not worked together or had anything to do with each other since 2015. When asked when Ms KUDRACOVA last saw Mr SALEH she said he comes to visit the children. When asked if this was a regular thing she said no. When asked where he was living she stated that she believes he lives in Bradford and was unaware that he had given a Spalding address to Leicester Trading Standards officers, when this was put to her. Ms KUDRACOVA stated she is the sole person on the tenancy agreement at her home address, [REDACTED] and moved there in January 2020.

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Ms KUDRACOVA and her representative were adamant during the hearing for the new premises licence that she wasn't in charge of Delicja during the Police visit on 13/3/20, stating she was just visiting to put up signage. Ms KUDRACOVA also stated she wasn't going to take charge until she had the premises licence, which was expected to be on 21/3/20, however due to the representation and subsequent hearing she didn't have the premises licence in her name until 24/4/20 when the transfer this objection relates to was made. During the visit on 13/3/20 I spoke with staff and asked them if there had been any major changes since Ms KUDRACOVA took over, they replied no, they were asked if there had been any change in suppliers, they replied no.

When Lincolnshire Police were informed that the appeal had creased (it later transpired that it hadn't and this was down to human error at the Magistrates Court) a request was made for a local officer to attend and check that alcohol had been removed from sale. On 20/2/20 Sgt 503 MOSLEY and Insp 1189 WATERS attended the premises and requested that the alcohol be moved into the store room. They attended again an hour later and saw that that this had been done. They conversed with the shop workers and spoke with the owner over the phone and thanked 'him' for removing the alcohol so quickly. The person Sgt MOSLEY spoke to over the phone who he described as the 'owner' gave Ms KUKRACOVA'S details and home address. When I informed him that Ms KUDRACOVA is female he re attended Delicja on 21/2/20 and spoke to staff who confirmed that Ms KUDRACOVA is female, they provided him with her mobile number, Sgt MOSLEY said he would pop in some time, to meet her and left his contact details. Shortly after she called him, from the number given by him to the staff, indicating that she was in control of the premises at that time.

During the hearing for the new premises licence, when discussing the meeting Sgt ENDERBY and myself had with Ms KUDRACOVA on 13/3/20, Ms KUDRACOVA explained that she was misunderstood due to the language barrier. When she gave the name Omar QADIR, she was talking about the father of her children. When she spoke about it being a family business and having a husband who was

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inexperienced in retail, she was talking about her fiancée Maric KLITCHCO. Sgt ENDERBY explained that the question of who the father of her children is was not asked and would never be asked as it has no relevance to licensing. The conversation was about her partner and family was in relation to who was going to be involved with the business as this is relevant to licensing. Ms KUDRACOVA was discussing the same male throughout the whole conversation, there was never any mention of two different males. Ms KUDRACOVA does have a good understanding of English and she can be understood and is capable of saying when she doesn't understand something. This was not the case during this meeting. Her solicitor didn't think she required an interpreter at the new premises licence hearing, although one was then requested by Ms KUDRACOVA herself on the day.

I visited Delicja on 29/4/20 following the transfer application, to see if alcohol was being sold and if so to make sure Ms KUDRACOVA had a copy of the premise licence and was compliant with the licence conditions. My visit, by chance, coincided with a visit from Ms KUDRACOVA'S new solicitor Ms CARTMELL, who was attending to train staff and ensure compliance with the licence. I pointed out 3 issues regarding the alcohol displayed for sale.

The first was that the wine was not priced at all. It is an offence under the Price Marking Order 2004 to not have items priced. Customers should be able to see the price for an item without having to ask for it. The second concern was that some of the wine appeared to have foreign duty stamps on the bottles, which indicates it was destined for another county or has come from another country where duty has been paid for that country; therefore it hasn't had UK duty paid and is likely smuggled goods.

The third was the beer pricing. All the beer in cans on display, regardless of alcohol by volume (ABV) was priced at £1.29 each. There was a sign saying Volfas £1 but that shelf behind it was empty. I noted that one of the brands of beer cans on sale was Perla Black 500ml 7.6% ABV. The government charges a much higher rate of tax on beers over 7.5% ABV, so for a beer of that ABV to be the same price as a much lower ABV does not make business sense, when if they bought the product legally, and had the same percentage mark up, they should have different retail prices. The duty plus VAT on a 500ml can of

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7.6% beer is £1.13. This is the tax alone, not the cost of the can, its contents, the transportation, the profit etc, indicating that a price of £1.29 per can is likely smuggled goods.

These concerns were relayed to Ms KUDRACVA and Ms CARTMELL. Ms KUDRACOVA explained that the alcohol on display was bought by the previous owner, and it was priced that way as that is what he had done. I asked to see receipts/invoices for the alcohol concerned, as yet none has been provided. Ms CARTMELL assured me that the alcohol would be removed from display and placed in the store room and only put back on the shop floor when the invoices had been found, to show duty had been paid and the correct pricing will be applied. The full premises licence was available within the premises to view and no compliance check was carried out do to all staff attending for training, it therefore not an appropriate time.

Please note that in the review for the premises licence this transfer relate to Lincolnshire Police informed the committee of very similar concerns, taken directly out of the review paperwork 'Cans of beer were offered for sale without a price being displayed. The Price Marking Order 2004 states that there must be a clear selling or unit price, which is easily identifiable without having to ask the trader. Beer cans were found to being put through the till at one price, then discounted by the sales assistant to a price which in one case was only 7p above the mandatory price (duty plus VAT). A can of 500ml 7.6% ABV Perla Black has a mandatory, duty plus VAT price of £1.13 – this is the price of the tax alone. Its price when put through the till showed £1.79, however it was sold for £1.20 after being discounted. This means that that 7p cost includes production costs of the fluid, the production costs of the can, transportation costs, profits for each process of the chain and the tax on those profits for it to be a worthwhile line. This is highly unlikely and more than likely smuggled good. Leading to the suspicion of smuggled goods on licensed premises – an offence under Section 144 Licensing Act 2003'.

Lincolnshire Police would have expected for the sale of alcohol to have been delayed until after the training and checking of compliance by an experienced hand, as the risk to the licensing objectives, considering the history of the premises and the new licence holder, Ms KUDRACOVA, is too great. The

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issues found by me are likely to have been there some days previous and show the lack of experience by Ms KUDRACOVA who, it is understood has not held the positions of premises licence holder or designated premises supervisor before, although she stated she has 3 years' experience in licenced premises during discussions with the Police, Ms KUDRACOVA stated during the hearing for the new premises licence that this didn't include selling alcohol. Her other retail experience was in clothing shops. This shows Ms KUDRACOVA'S lack of experience and willingness to put profit before the licensing objectives.

Due to the history of the premises, its concerns with criminality, the history of Spalding with its well documented issues regarding illegal cigarettes, the recent refusal of the applicant regarding a new premises licence, and the recent concerns yet again around the pricing of alcohol and smuggled goods at this premises the Chief Officer of Police is satisfied the exceptional circumstances of the case are such that granting the application would undermine the crime prevention objective. Accordingly, it is submitted that the Authority should reject the application as it is necessary for the promotion of the crime prevention objective.

Prior to the hearing Lincolnshire Police submitted further information following enquiries into what was said at the previous hearing. As stated in the objections already submitted, Ms KUDRACOVA confirmed at the last hearing for the new premises licence that she wasn't married, had never been married and that she is no longer in a relationship with Mr Omar Qadir SALEH. She stated they were in a relationship, he is the father of her two children, however her last dealings with him were in 2015 when he signed to say that he was the father of her youngest child. She stated that they had no business relationship, they have not worked together or had anything to do with each other since 2015. When asked when Ms KUDRACOVA last saw Mr SALEH she said he comes to visit the children. When asked if this was a regular thing she said no. When asked where he was living she stated that she believes he lives in Bradford and was unaware that he had given a Spalding address to Leicester Trading Standards

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officers, when this was put to her. Ms KUDRACOVA stated she is the sole person on the tenancy agreement at her home address, [REDACTED] and moved there in January 2020.

Lincolnshire Police have discovered that a vehicle with the registration mark WNZ 4854 is registered to Omar SALEH at the address of [REDACTED], the home address of Ms KUDRACOVA. He is the sole insured driver and has been the keeper of that vehicle since 15/05/18. It is also the sole vehicle registered at that address.

That vehicle was found speeding on Lincolnshire's roads in January 2020 and Lincolnshire Police have been in contact with Omar SALEH throughout February. An individual contacted Lincolnshire Police by email regarding the speeding offence using the name Alan HASSAN wanting photographic confirmation. Mr SALEH then contacted Lincolnshire Police by post using the SALEH identity and named the person responsible for driving at the time, showing he still has dealings with the vehicle.

Many police vehicles are now fitted with an automatic number plate recognition system, which records the registration marks of the vehicles the police car passes, it records an image along with information about location, time, etc and instantly checks this against a database and will alarm if the vehicle has no insurance for example. sDelicja is situated on the same road as Spalding Police Station, so many police vehicles pass up and down that road. Vehicle WNZ 4854 has been picked up repeatedly being parked in the taxi rank outside, across the road or near to Delicja on numerous occasions, sometimes multiple times on the same day. 39 times over the last 90 days (reading taken 28/5/20) with the majority being between 13th March 2020 (the date the asset purchase agreement was signed) and 17th April 2020 (the date of the last hearing when the premises licence was refused).

The vehicle was captured being parked outside 5 Westlode Street (Taste of China) at 1304hrs on March 13th 2020, which was the date and time of the Police Licensing visit to the premises. As at the conclusion of the meeting, having attended and waited for Ms KUDRACOVA to attend, and having had the discussion with her about her partner and the intentions with the business I took photographs of the Asset Purchase Agreement as supplied by Ms KUDRACOV and these are timed at 1336hrs.

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Vehicle WNZ 4854 has been seen to be parked on the driveway of [REDACTED] on more than one occasion since the last hearing, including on the evening of 29th April 2020 following my visit to Delicja earlier in the day.

This shows a clear link between Mr SALEH, Ms KUDRACOVA, Delicja and the [REDACTED] address, which shouldn't be there if there was no association, as stated by Ms KUDRACOVA at the last hearing.

Enquiries were made into who lives at the [REDACTED] address. A Tenancy Agreement for [REDACTED] shows that both Milena KUDRACOVA and Omar Qadir SALEH are joint tenants, with Mr SALEH being the lead tenant at the address. The agreement started on 27th December 2019 and is a 6 month lease. Both of their signatures are located at the rear.

Lincolnshire Police believes the overwhelming evidence obtained since the previous hearing shows a deliberate attempt to mislead the Licensing Sub-Committee. Ms KUDRACOVA clearly has a relationship with Mr SALEH, which she has denied, his vehicle, which only he is insured to drive and the only vehicle registered at [REDACTED] address, where they both have tenancy is frequently seen parked outside Delicja and has been seen at [REDACTED] Mr SALEH'S previous history, his involvement with criminality and the undermining of the licensing objectives and his clear links to Ms KUDRACOVA, her lack of transparency and her deliberate attempts to mislead Police Officers and Councillors alike are the reasons why Lincolnshire Police request that this transfer and DPS variation be refused.

The hearing occurred on 4th June 2020 and the transfer and vary DPS on PL0337 were refused.

Of note found during that enquiry, which was not used at hearing was information linking KUDRACOVA'S partner Mr SALEH to Mr Dairy Sleman JALAL the premises licence holder before Mr ATTUF, who stayed on as DPS until the frequent DPS applications became permanent in November 2020. Mr JALAL is a personal licence holder in South Holland and as such gave his home address as [REDACTED] Lincolnshire Police records show this update in June 2018 when he became responsible for the premise licence at Delicja. Lincolnshire Police has not been informed of a change of address for him and he commits an offence if he fails to tell the council of a change of

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address. Enquiries into vehicle WNZ4854 on 27 April 2020 showed that insurance was held by policy holder Omar Qadir SALEH between 09/082019 and 08/08/2020 at [REDACTED]

[REDACTED] The notice of intended prosecution was sent to Omar SALEH from the Central Ticket Office on 29th January 2020 to the [REDACTED] address as this was shown as the registered keepers address at the time, it has since changed to [REDACTED]. Mr SALEH must have received that notice of intended prosecution, sent to the [REDACTED] address as he then contacted Lincolnshire Police after that.

On liaising with Calluna O'Farrell, Trading Standards Officer, Leicestershire County Council and her dealing with Mr Omar Qadir SALEH she informed me in an email dated 16 March 2020 that she had the [REDACTED] address for Mr SALEH. Then in another email on 18th March 2020 she confirmed this by stating 'I have since spoke to Sharif/Saleh on the phone and he gave his address for me to send letters to as: [REDACTED]

Lincolnshire Police then received a series of Vary DPS applications from Ms KUDRACOVA which put her in day to day control of alcohol sales due to the immediate effect box being ticked whilst knowing Lincolnshire Police would object and the committee likely refuse due to previous history, then days before the scheduled hearing would withdraw that application and submit another, starting the whole process over again. This became a monthly occurrence with 4 such applications taking us from June 2020 to the end of September 2020 all whilst Mr ATTUF remained premises licence holder. In November 2020 Lincolnshire Police received and application of transfer and vary DPS to Saglar AHMAT, and this time, due to lack of information to be satisfied enough that the exceptional circumstances of the case are such that granting the application would undermine the crime prevention objective, did not object to the transfer or vary DPS applications.

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It's also been noted as part of the enquiries into this premises and the people responsible for the premises licence that Barham Sawar MAHMOUD who was the premises licence holder from 2015-2018, before Dairy Sleman JALAL and who's name has been on the lease throughout this enquiry and who's personal licence is with South Holland, pleaded guilty to the sale of illicit tobacco to test purchasers at Delicja, Frodingham Road, Scunthorpe and was fined £266 and ordered to pay costs of £740 and a £32 victim surcharge, according to the Grimsby Telegraph article dated 25 February 2020.

Enquiries as to who holds the lease for the premises shows that as of 5th May 2021 Barham Sawar MAHMOUD is still the lease holder and has been since 2016. Despite Saglar AHMAT taking control of the premise licence and therefore the business in November 2020, he has still not acquired the lease some 6 months later, which is great cause for concern considering the protracted history. With the supposed purchasing of the business by JALAL, ATTUF, SALAR, KUDRACOVA and AHMAT since that time as they have all applied for the premise licence with immediate effect.

The building owner is under the impression that Mr MAHMOUD has had several different managers in place for the last few years. He informed me that before Christmas 2020 a new 'manager' took over who he thought was called Ahmed. Ahmed asked for the lease to be assigned, but only on 4 May 2021 was he introduced to 'Salman' who wants to now take the lease on.

This information greatly raises questions as to who's really been responsible since November 2020? Who is Ahmed? And why only now is Mr AHMAT meeting the building owner and asking for the lease to be assigned?

On carrying out further checks on individuals within this statement, to enable a full view criminal activities and connections to Unit 2, I noted that on 3rd March 2021 Police Officers conducted a licensing visit at Bila Off Licence, 168 Clayton Road, Bradford, BD72RD. Counterfeit/Illicit tobacco recovered from behind counter and rear store room. Total amount was 526 x 20 packets of cigarettes and 27 x 50g

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pouches of hand rolling tobacco. Omar Qadir SALEH has been both the PLH and DPS since 5 April 2017, he still was on 12 March 2020 when last confirmed with Bradford Council. He is also the sole active director of Bila Mini Market Ltd, being appointed on 15 March 2020, with the registered address of 168 Clayton Road, Bradford and with that same address as his personal correspondence address on Companies House. His nature of control of that business is 75% or more of ownership of shares and 75% or more ownership of voting rights, with the right to appoint and remove directors.

On 7th May 2021 at 1650hrs myself and Sgt 1040 ENDERBY attended what is now called A2Z (was Delicja) Unit 2, 20 Westlode St, Spalding in order to carry out a compliance check.

On looking round the premises I noted that there was a long shelf with many different brands and ABV's of beer that were not price marked, either individually or on the shelf. To find out the price of an individual can I had to take it to the counter to be scanned to find out the price. As stated in the review application I submitted and in the paperwork I submitted following a visit to Delicja when Ms KUDRACOVA was involved, all items have to be visibly priced under the Price Marking Order. The Price Marking Order 2004 states that there must be a clear selling or unit price, which is easily identifiable without having to ask the trader.

There was a new staff member who had been bought in from Peterborough that day due to other staff not having arrived for work. He was working the checkout till whilst a female member of staff was serving customers at the deli counter at the rear of the premises or replacing stock when she wasn't busy at the deli counter. He male shop worker was unsure of pricing when asked about the unpriced beer, and when there was an issue with the card machine and a replacement till roll was needed, he couldn't work it and the machine was then out of action. No one present knew how to work the CCTV or indeed where it was. When asked the male admitted he hadn't been trained but stated he has experience working in shops.

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I knew where the CCTV hard drive was and how to use it from my previous visit which led to the review so located it and saw it had footage retained from 11th April 2021. To doubly confirm this I went to play back footage from 10th April 2021 the screen showed no files, yet I was able to play footage from 11th April 2021. Assuming the day of this visit and the 11th are a full days of recording this is 27 days worth of footage, not 28 days, which is a condition on the premises licence. There was now a side facing camera showing the till area, which wasn't there wasn't last time I looked at the CCTV, however there still wasn't a camera providing a front facial view of customers at the tills, as required under Annex 2 of the premises licence conditions.

We found a folder containing refusals log, staff training, litter picking record etc. The refusals appeared to have started well when Mr AHMAT took over showing 10 entries between the end of November 2020 and end of March 2021, however there were no entries after that and we are now in May and with the easing of lockdown it would be expected that traffic would have increased and therefore the likelihood of more refusals. None of the entries had been signed by the DPS to show they had been audited since the commencement of the register. It is a condition under Annex 2 that the register is audited from time to time by the DPS, and with nearly six months of operation with new staff, I would have expected this to happen within the first month, to make sure staff and doing things correctly, and then continue at a set period, or less if there was a training issue highlighted, a positive test purchase, or a new member of staff.

Also within the folder was signed authorisation to sell alcohol by the DPS to certain individuals. The female shop worker was on the list however the male shop worker wasn't, and it was the same for the training records. I didn't witness the female selling alcohol, she was busy at the deli and stacking shelves, the untrained, unauthorised male shop worker was the person at the till making the alcohol sales.

The litter picking record, although not a condition on the licence had 8 entries from mid November 2020 to mid January 2021 and then nothing. It shows good intentions to start with that were then not

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continued, there was obviously a need as it was started in the first place and the record shows that rubbish and cans were collected from outside on 5 of those occasions. This shows a lack of management in checking that practices which are implemented and adhered to, and also shows a lack of care in wanting that information to know the issues of the area, as Unit 2 is within the public space protection order for street drinking, so empty cans if of alcohol should be of great concern and highlight a need to train staff regarding watching the outside of the shop and who not to sell cans to as they have been known to drink them in the street and breach the order.

I spoke with Mr AHMAT over the phone, to inform him of my visit and what I had discovered. He seems to be unaware that the appeal hearing is a court in 14th May 2021. He explained that he'd had issues with the premises in terms of staff shortage, electricity bills, and the scanner machine and had sent a friend over to help out today. I explain that considering the history of the premise licence he decided to take on, which he was well aware of because I told him prior to him transferring the licence. I also informed him at that time that he had the option of applying for a completely new licence and using temporary event notices to cover the interim period before the licence is granted, and therefore not having any concern with the appeal. I should be visiting a premises that it 100% perfect, that knows exactly what is should be doing and why because it has been gone over so many times before. All the past reports I have submitted are online to view as South Holland District Council publish them, a small amount of searching would have bought them up. Or Mr AHMAT could have contacted me or the licensing department at the Council as he had both our details, to ask for assistance, clarification, past history etc. We are very contactable and willing to assist as we all want responsible retailers as they assist in lessening the issues for the people of Spalding. By opening, when things weren't in place as they should be, according to the premise licence undermines the licensing objectives those conditions are put in place to protect, it's also incredibly foolhardy when you know the history of the premises and that an appeal is due, and leads me to believe that there would be even less care about the licensing

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objectives and actively promoting them when there is less scrutiny from authorities should the premises licence remain in place.

My experience as a licensing officer for 7 years and as a search officer for 10 years prior to that has led me to believe that there is a connection between licenced and unlicensed premises, smuggled goods, be it tobacco products and alcohol (beer and spirits) and illegal working/people smuggling and it is large scale organised crime which generally goes under the radar because people see it as individual shops doing individual criminality rather than a network, they don't realise the amount of money involved and the individual concerns are dealt with by different agencies. I have seized an accounting book from a small out of the way shop in Spalding turning over £50,000 a month and I've had similar in Boston. A premise licence is a means to an ends for selling smuggled goods and laundering the proceeds to make a profit. There is no concern about the licensing objectives and the effect their activity is placing on the local community.

In total for this one premises Lincolnshire Police have submitted 15 separate pieces of work since 2018 in an effort to stop individuals with proven links to criminality obtaining the licence or remaining in a position of control on the licence. There is still great concern remaining as to who's behind the premises and following the visit on 7th May there is little confidence that issues with licence compliance and therefore the licensing objectives will ever be taken seriously and resolved.

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