

MSS109

**Sullivan Michael J - QK**

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**From:** Sullivan Michael J - QK  
**Sent:** 27 October 2015 11:12  
**To:** 'jamest@hodders.co.uk'  
**Subject:** Gwalia Club

**Attachments:** Gwalia Licence.pdf

Hello James

Do you have any updates yet regarding the below e-mail request, also have you had a chance to formulate a list of actions the club will implement for the next TEN as discussed at the meeting.

Regards

PC368QK  
Michael Sullivan  
Brent Licensing Team  
Tel 07500993897

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**From:** Sullivan Michael J - QK  
**Sent:** 15 October 2015 11:19  
**To:** 'jamest@hodders.co.uk'  
**Cc:** Mortimer Nick - QK  
**Subject:** Gwalia Club

Dear James

Further to our meeting at the Gwalia Club, can I ask for the following information to be supplied to me.

1. A list of the club Members
2. The rules of the Club
3. A list of the Committee members
4. Notes from the last Committee meeting

Please find attached a copy of the Licence, there are a number of conditions that the club need to be abiding by, and the first one that jumped out at me was the condition regarding their CCTV, can you please make sure that all the conditions on the licence are being complied with.

Can you confirm that the matters discussed at the meeting will be in place for this Saturday nights TEN



Gwalia Licence.pdf  
(28 KB)

Kind Regards

PC368QK  
Michael Sullivan  
Brent Licensing Team  
Tel 07500993897

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EXHIBIT MJS/10

## WITNESS STATEMENT

(CJ Act 1967, s.9; MC Act 1980, ss.5A(3)(a) and 5B; MC Rules 1981, r.70)

Statement of **Michael SULLIVAN PC 368 QK** ..... URN: 

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Age if under 18 **Over 18** ..... (if over 18 insert 'over 18') Occupation: **Police Officer** .....

This statement (consisting of: .... **2**..... pages 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 anything in it which I know to be false, or do not believe to be true.

Signature: .....

*Michael Sullivan*

Date: .....

*7th January 2016*

On the 12th December 2015 I was on duty in plain clothes in company with PC McDonald and PC Whitcomb, we were on mobile patrols in an unmarked police vehicle, all the above named officers are attached to the Brent Licensing Unit, and were carrying out licensing visit on licensed premises, at about 01.00 hours we drove into Manor Park Road Harlesden NW10 from Craven Park Road NW10, when my attention was drawn to a large group of drunk youths in the road directly outside The Gwalia Workingman's Club Manor Park Road NW10. We stopped our vehicle, got out and started moving the groups of drunken youths out of the road for their own safety; I would estimate that there were between 50 to 70 teenagers most seemed very drunk and most were staggering across the road dodging traffic some were sitting on the pavement, a couple were vomiting against the wall of the club, the majority of the teens were very loud, shouting to one another and laughing.

I could see people were entering and exiting the Gwalia Club, the front gate was still open and I could see lights on inside the club, the groups of teenagers outside all appeared dressed up and some holding balloons, which indicated to me that there had been a party inside the club.

We then started to make our way into the club where I spoke to a young drunk male who had what appeared to be a short glass that had spirits in it, he was spoken too and stated that there had been an 18th Birthday party in the club for his niece, he was asked if he was a member of the club, to which he replied 'No' he then went on to say that he was trying to get the youngsters into cabs. We then buzzed the entrance door intercom, and were allowed in, where I spoke to a member of the bar staff and asked if the club Chairman Mr Brian Simmons was available, it was apparent that a party had taken place inside the venue, and had just finished as there were people were removing party decorations, there was a DJ removing his equipment, and people were clearing glasses from the tables, a few seconds later Mr Simmons appeared and said 'oh for fuck sake not you again' I asked Brian if there had been a teen birthday party held at the club tonight, Mr Simmons was very angry saying that it was a members party, asked what member he replied 'Pat Conway' I asked if we could speak to Pat Conway to confirm this, to which he replied 'He's just left' officers informed Mr Simmons about their concerns around the drunk vulnerable

Signature: .....

*Michael Sullivan*

Signature witnessed by: .....

Continuation of Statement of **Michael SULLIVAN PC 368 QK**.....

youngsters outside the premises, and insisted that a responsible adult go outside and supervise them, at this point a female stormed over towards police shouting 'who are you, show me your badges, you could be anyone' we showed her our badges at which point she informed us that she was related to the girl who's 18th Birthday party had taken place in the club, she said the birthday girl had gone to hospital after falling off the stage drunk and injured herself, she was asked if she knew Pat Conway, to which she replied 'who, no I don't know him' Brian then stated that their had been door supervisors working on the door, when asked where they were he replied 'they have gone now' another male then appeared, who I had previously met at a meeting with the clubs committee members, he started shouting in an angry manner, and said words to the effect of, why are you here this is a private members club you have no right to be in here, fuck off you fucking arse hole, I warned him about his behaviour, by this time Brian, Maggie and the other club member were shouting and arguing with officers they were joined by a couple of other people who were all very anti police, and seemed to think that we were there to cause problems for the club, I tried to explain that the club was a private members club and that I believed this function tonight was not a members party, Brian then made reference to a request I had made some time before where I had asked for copies of the clubs rule book, Committee members list, members list, and minutes from the last Committee meeting, he stated that the club was not going to give me these details as I had no right to them, and that his solicitor had told them that we couldn't just come into the club as it was a private members club, it was explained to them that officers had concerns for the safety of the teenagers that were outside and that a member of the bar staff had allowed us in to the club when we buzzed to come in.

It was apparent that the group were not listening to what we were saying so we decided to leave rather than aggravate the situation, but asked if someone could go outside and supervise the drunken groups, Maggie went outside and started shouting at the groups to go home, we then left the location.

Signature: .....



Signature witnessed by: .....

MJS/11

**WITNESS STATEMENT**

CJ Act 1967, s.9; MC Act 1980, ss.5A(3)(a) and 5B; Criminal Procedure Rules 2005, Rule 27.1

Statement of **Nicola McDonald**..... URN:Age if under 18 **Over 18**..... (if over 18 insert 'over 18') Occupation: **Police Officer 008926** .....

This statement (consisting of: .... **3**..... pages 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 anything in it which I know to be false, or do not believe to be true.

Signature:

Date:

Tick if witness evidence is visually recorded ☐ (supply witness details on rear)

I am a Police Constable of 26 years experience, the last 20 years I have worked on the London Borough of Brent. Since 2005 I have been attached to the Licensing unit for the borough. I have been authorised via a delegated authority to represent the Borough Commander for the London Borough of Brent and for the Commissioner of the Metropolitan Police Service to act on licensing matters.

On the 12th December 2015 I was on duty in plain clothes although wearing my overt body armour, in company with PC Michael Sullivan and PC Paul Whitcomb. We were conducting visits to licensed premises within the borough. At approximately 0100 hours we were driving in an unmarked Police vehicle from Craven Park Road in to Manor Park Road, Harlesden when my attention was drawn to a large number of male and female teenagers both in the road, dodging traffic, on the pavement outside GWALIA Working Mens Club and also coming out of the gated entrance to the Gwalia Club. The scene was chaotic. We stopped the Police car and approached the Club on foot. I had to call to some of the youths to get out of the road. There were vehicles pulling up and some youths were attempting to get in to them, however these youths were unstable on their feet and were staggering in the road very dangerously. The youths were very loud, screaming, shouting and laughing in that over exaggerated way as a result of too much alcohol. The majority of these youths were drunk, they were completely unable to walk unsupported, some were slumped on the wall outside the Gwalia club, some were vomiting and there were numerous piles of vomit on the pavement. It did not take long to ascertain there had been an eighteenth birthday party at the Gwalia Club due to numbered balloons and by asking some of the youths who were dressed accordingly. PC Sullivan spoke to a IC3 male leaving the club with a balloon and small glass containing alcohol, he said the party was for his nieces 18th birthday. PC Sullivan asked him if he was a member of the club, he said 'no' but when hearing the shouts from the youths said 'I'm trying to get them in to cabs'. His speech was slurred he was unsteady on his feet, his eyes were red, he was drunk.

There were lights on in the Gwalia Club, the entrance door was locked so we pressed the buzzer. The door lock was released and we entered the Club. I walked down a corridor to a large room at the end. There was

Signature:

Signature witnessed by:



Continuation of Statement of **Nicola McDonald** .....

approximately 20 persons in the room. It was obvious there had been a party in the room, there was a DJ packing away his music equipment, people collecting glasses and putting them on the bar, wiping tables, removing 18th banners and decorations, removing function covers from the chairs and stacking them. I spoke to a tall female who looked about 25 years old and asked 'do you work here are you a member'. She replied 'not me, just helping to clear up'. I asked 'who is in charge'. She replied 'I don't know'. I then saw that PC Sullivan was standing talking to a male I recognised from a previous visit to the premise, I know him as Brian Simmons. He appeared to be agitated with Police attendance, he was speaking with a raised voice and his arms were folded and then finger pointing. I approached them and heard Mr Simmons saying 'it's a members party'. PC Sullivan said 'what member'? Mr Simmons replied 'Pat Conway'. PC Sullivan asked to speak to Pat Conway, Mr Simmons said 'he's just left'. I then introduced myself and Mr Simmons said he remembered me from the previous visit. We were then joined by another middle aged male who's name I didn't ascertain, he was very unhappy about Police presence in the Club, his voice was raised and aggressive. I asked him to calm down and Mr Simmons asked him to quieten down so they could listen to what I had to say. I expressed my concern of the large amount of drunken vulnerable teenagers unsupervised, behaving dangerously and at risk of injury in the street having left the club. I asked where the door supervisors were but received no reply. I then insisted sober responsible adults go outside and supervise the situation. With this a small white female stormed over to me and my colleagues although I could smell alcohol on her breath she was not drunk. She shouted 'who are you, show me your badges, you could be anyone'. My colleagues and I then produced our warrant cards. I asked the female her name and she said Maggie. I said 'you're not Pat Conway then?' Maggie replied 'no, who is she'. She then asked what the problem was and why we had entered the club. I explained what I had witnessed outside the premise. Maggie went on to say that there had been an 18th birthday party for her female relative, however she (and her mother) had left the party early and gone to hospital as she had injured herself falling from the stage whilst drunk and dancing. She said I have been left in charge of the party. I said 'do you know Pat Conway'? Maggie answered 'who, no I don't know him'. I asked again if there were any door supervisors to which Mr Simmons replied 'they have now gone'. We were then joined by another even angrier elderly male who began shouting and swearing at my colleagues and I, asking why Police were at the Club, stating the venue was a private members club, we had no right to be in there and that we should 'Fuck Off and called PC Sullivan a fucking arsehole. This generated more animosity towards my colleagues and I and a barrage of abuse and aggression. I lead Maggie to the front of the premises and highlighted the need to protect the vulnerable teenagers. As the party was finished and the bar closing we considered it more sensible to leave the venue than aggravate the situation more.

In all my experience as a licensing officer I have never attended a premise holding a club premises certificate that have been quiet so hostile to Police. In other clubs I have visited I have found a list of club rules displayed near the entrance on the notice board, in addition to a visitor's book overtly placed for guests to be signed in. The Gwalia Club does not have this or anything similar. Other Clubs operating successfully in the terms of their authority usually have reference to meetings and AGM's and committee members on the notice board. Again Gwalia had none of this either on this night or on my previous visit with PC Sullivan on 30th October 2015.

Signature: .....

Signature witnessed by: .....

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Continuation of Statement of **Nicola McDonald** .....

Also in my experience registered security industry door supervisors would not book off duty and leave a premise when there were still customers leaving the venue and vulnerably persons behaving as they were outside the Gwalia club that night. The door supervisors are aware they have a duty of care to the customers of a venue and part of their training is dispersal of customers at closing time.



Signature: .....

Signature witnessed by: .....

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**Witness contact details**

Home address: .....

Postcode: .....

Home telephone number ..... Work telephone number .....

Mobile/pager number ..... Email address: .....

Preferred means of contact: .....

~~Male~~/ **Female** (delete as applicable) Date and place of birth: .....

Former name: ..... Ethnicity Code (16+1): ..... Religion/belief: .....

**Dates of witness non-availability** .....**Witness care**

- a) Is the witness willing and likely to attend court? **No**. If 'No', include reason(s) on **MG6**.
- b) What can be done to ensure attendance?
- c) Does the witness require a Special Measures Assessment as a vulnerable or intimidated witness?  
**No**. If 'Yes' submit **MG2** with file.
- d) Does the witness have any specific care needs? **No**. If 'Yes' what are they? (Disability, healthcare, childcare, transport, , language difficulties, visually impaired, restricted mobility or other concerns?)

**Witness Consent (for witness completion)**

- |  |     |                          |    |                          |                              |
|--|-----|--------------------------|----|--------------------------|------------------------------|
| a) The criminal justice process and Victim Personal Statement scheme (victims only) has been explained to me   | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |                              |
| b) I have been given the Victim Personal Statement leaflet   | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |                              |
| c) I have been given the leaflet 'Giving a witness statement to police — what happens next?'   | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |                              |
| d) I consent to police having access to my medical record(s) in relation to this matter:<br>(obtained in accordance with local practice)   | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A <input type="checkbox"/> |
| e) I consent to my medical record in relation to this matter being disclosed to the defence:   | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A <input type="checkbox"/> |
| f) I consent to the statement being disclosed for the purposes of civil proceedings e.g. child care proceedings, CICA  | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |                              |
| g) The information recorded above will be disclosed to the Witness Service so they can offer help and support, unless you ask them not to. Tick this box to <u>decline</u> their services: |     |                          |    |                          | <input type="checkbox"/>     |

Signature of witness: ..... Print name: .....

Signature of parent/guardian/appropriate adult: ..... Print name: .....

Address and telephone number if different from above: .....

Statement taken by (print name): **PC 157QK 008926 Nicola McDonald** ..... Station: **Wembley** .....

Time and place statement taken: .....

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MJS/12



**METROPOLITAN  
POLICE**

Working together for a safer London

TERRITORIAL POLICING

Mr Brian Simmons (Chairman )

GWALIA Workingmens club  
99 Manor Park Road, NW10 4JU

**Brent Borough  
Licensing Department**

The Licensing Officer  
5th Floor  
Brent Civic Centre  
Engineers Way  
Wembley  
HA90FJ

Wembley Police Station  
603 Harrow Road  
Wembley  
HA0 2HH

Tel: 020 8733 3206

Email:  
michael.sullivan3@met.police.  
uk  
www.met.police.uk

Date: 16/12/2015

Dear Sir,

I am writing this letter in response to an incident at the above premises on Saturday 12th December 2015.

In accordance with the conditions of your premises licence, I am requesting a copy of the CCTV footage from this venue from 21:00 hours on Friday 11th December 2015, until 01:30am on Saturday 12th December 2015.

I am happy to collect this from the premises. Please confirm to the above email address upon receipt of this letter when the CCTV will be ready for inspection and collection.

Yours Sincerely,

**Michael Sullivan PC 368QK**  
**Licensing Constable**  
**Brent Borough Police**

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MJS/13



**METROPOLITAN  
POLICE**

Working together for a safer London

TERRITORIAL POLICING

Mr Brian Simmons (Chairman )

GWALIA Workingmens club  
99 Manor Park Road, NW10 4JU

The Licensing Officer

5th Floor  
Brent Civic Centre  
Engineers Way  
Wembley  
HA90FJ

**Brent Borough  
Licensing Department**

Wembley Police Station  
603 Harrow Road  
Wembley  
HA0 2HH

Tel: 020 8733 3206

Email:  
michael.sullivan3@met.police.  
uk  
www.met.police.uk

Date: 16/12/2015

Dear Sir,

I am writing this letter in response to an incident at the above premises on Friday 11th December 2015.

Can you please supply me with the following information?

1. A list of the club Members
2. The rules of the Club
3. A list of the Committee members
4. Notes from the last Committee meeting

I am happy to collect these from the premises. Please confirm to the above email address upon receipt of this letter when those items will be ready for inspection and collection.

Yours Sincerely,

**Michael Sullivan PC 368QK**  
**Licensing Constable**  
**Brent Borough Police**

(SI)



MJS/14

**Sullivan Michael J - QK**

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**From:** Sullivan Michael J - QK  
**Sent:** 17 December 2015 13:17  
**To:** 'jamest@hodders.co.uk'  
**Subject:** Gwalia working men's Club

**Attachments:** rule book request letter - Gwalia.doc; CCTV request letter - Gwalia 12.12.15.doc

Dear James

I have spoken to Brian and he has asked me to leave the attached letters at the club for him today, as he will not be at the premises until later tonight, can I ask that you contact him and confirm he has received the letters and understands what is being asked for.

Can I ask that when you have spoken with him that you e-mail me confirming that he has received the letters.



rule book request letter - Gwa...    CCTV request letter - Gwalia 1...

Regards

Michael Sullivan  
PC368QK  
Brent Licensing Team



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