REPRESENTATIONS ON BEHALF OF THE PREMISES LICENCE HOLDER

RESTAURANT BAR SIMPRAO LTD t/a RECANTO K

RESPONSE TO THE REVIEW OF THE PREMISES LICENCE

Madam Chair and Members of the Licensing Sub-Committee,

We act on behalf of the Premises Licence Holder in relation to the present review proceedings.

At the outset, the Licence Holder wishes to make clear that he takes the concerns raised by the Responsible Authorities seriously and does not seek to minimise the matters which have led to this review. However, the Committee is respectfully invited to consider the current circumstances of the business, the substantial remedial actions already implemented, and whether the exceptional sanction of revocation would be proportionate, necessary or justified in light of the licensing objectives.

The Licensing Act 2003 requires that any step taken by the Committee must be appropriate and proportionate for the promotion of the licensing objectives. Revocation is rightly regarded as a measure of last resort and should only be imposed where lesser measures would be insufficient.

In the present case, significant changes have already occurred.

CHANGE OF MANAGEMENT AND OPERATIONAL CONTROL

Perhaps the most important development since the events giving rise to this review is the complete restructuring of the day-to-day management of the premises.

The Licence Holder's wife has now assumed responsibility for the daily operation of the restaurant and has introduced a substantially different management culture.

Under the new management arrangements:

- Alcohol sales cease at 23:30;
- Music is terminated by 23:00;
- Customers are required to leave the premises by midnight;
- Security personnel continue to be utilised during busy periods;
- Greater supervision is exercised over staff and customers;
- Additional measures have been implemented to ensure compliance with licensing conditions.

These changes are not future proposals. They are measures that are already in operation and have been implemented specifically to address concerns raised by local residents and regulatory authorities.

The Committee is therefore not being asked to place reliance upon promises. It is being asked to consider a business that has already taken substantial corrective action.

THE LICENCE HOLDER'S COOPERATION AND ACCEPTANCE OF RESPONSIBILITY

The Licence Holder has cooperated with authorities and has actively engaged in resolving outstanding matters.

Of particular significance is the fact that a formal repayment agreement has already been reached regarding the Home Office civil penalty.

Evidence before the Committee confirms that:

- The first instalment of £750 was paid on 1 May 2026;
- The repayment arrangement has been formally accepted;
- The next instalment is due on 10 June 2026;
- Further monthly payments will continue thereafter until the balance is discharged.

This is important evidence of responsibility, accountability and commitment to compliance.

The Licence Holder is not attempting to avoid his obligations. He has entered into a structured repayment arrangement and has already commenced payments.

THE FINANCIAL REALITY OF THE BUSINESS

The Committee is respectfully invited to consider the broader consequences that revocation would have, not only upon the Licence Holder but also upon employees, suppliers and family members who depend upon the continued operation of the business.

The restaurant currently faces substantial ongoing financial commitments, including:

- VAT liabilities exceeding £10,700;
- PAYE and payroll obligations to HMRC;
- Supplier and service contracts;
- Waste management and operational costs;
- Staff wages and employment obligations.

The business supports multiple employees and provides the sole or primary source of income for the Licence Holder and his family, including two young children.

If the licence is revoked, the consequences would be immediate and severe.

The business would lose its ability to trade effectively, resulting in:

- Loss of employment for staff;
- Inability to continue meeting VAT and PAYE obligations;
- Difficulty maintaining the agreed Home Office repayment plan;
- Significant financial hardship for the Licence Holder and his family;
- Increased risk of insolvency and closure of the business.

Whilst financial consequences alone cannot determine a licensing decision, they are relevant when assessing whether revocation is a proportionate response where genuine corrective action has already been undertaken.

THE LICENSING OBJECTIVES

The central question for this Committee is whether the licensing objectives can now be effectively promoted through the continued operation of the premises subject to existing and/or additional conditions.

We respectfully submit that they can.

The evidence demonstrates:

- A change in management structure;
- A reduction in operating hours in practice;
- Increased supervision;
- Continued security presence;
- Cooperation with authorities;
- Acceptance of responsibility;
- Ongoing compliance measures;
- A genuine commitment to improvement.

The licensing objectives are therefore capable of being protected through continued monitoring and proportionate conditions without resorting to the most severe sanction available.

PROPORTIONALITY

The statutory guidance issued under Section 182 of the Licensing Act 2003 emphasises that licensing authorities should ensure that measures taken are appropriate and proportionate.

Revocation should generally be reserved for cases where the operator demonstrates either an inability or an unwillingness to comply with the law.

That is not this case.

The evidence before the Committee demonstrates a business that is actively changing, actively investing in compliance and actively cooperating with regulatory authorities.

The Committee is therefore respectfully invited to conclude that the objectives of the Licensing Act can be achieved by allowing the premises to continue operating under its revised management structure and enhanced compliance arrangements.

CONCLUSION

The Licence Holder fully recognises the seriousness of these proceedings.

However, the evidence now before the Committee demonstrates a fundamentally different position from that which existed when the concerns first arose.

There has been:

- A significant change in management;
- Tangible operational improvements;

- Financial accountability;
- Active cooperation with authorities;
- Ongoing compliance efforts;
- A genuine commitment to rebuilding trust.

For those reasons, we respectfully submit that revocation would be a disproportionate response and that the licensing objectives can be effectively promoted through the continuation of the licence, together with any conditions the Committee considers appropriate.

Accordingly, the Premises Licence Holder respectfully requests that the Premises Licence be permitted to remain in force.

Respectfully submitted,

Gabby Cardoso
Legal Representative
ADVBRUK – International Legal Consulting

BEFORE THE BRENT LICENSING SUB-COMMITTEE

LICENSING ACT 2003

PREMISES LICENCE REVIEW

Recanto Kings
Unit 25, Sapcote Trading Centre
High Road
London NW10 2DH

WRITTEN REPRESENTATIONS ON BEHALF OF THE PREMISES LICENCE HOLDER

1. Introduction

These representations are submitted on behalf of the Premises Licence Holder and Designated Premises Supervisor, Mr Milson Ramos Silva, in response to the Review Application brought by Immigration Enforcement and supported by representations from the Metropolitan Police and the Licensing Authority.

The Premises Licence Holder acknowledges the concerns raised by the Responsible Authorities and recognises the seriousness of the matters that have led to this review.

However, it is respectfully submitted that revocation of the premises licence would be a disproportionate response in light of the substantial remedial actions already undertaken and the continued commitment of the licence holder to operate the premises in full compliance with the Licensing Act 2003 and all licence conditions.

2. Acceptance of Past Failings

The Premises Licence Holder does not seek to minimise the concerns raised by the authorities.

Following visits by Immigration Enforcement, the Metropolitan Police and Brent Council Licensing Officers, deficiencies were identified in the management and compliance systems operating at the premises.

The licence holder accepts that improvements were required and has since invested significant time, resources and effort to ensure that these shortcomings are not repeated.

3. Immigration Compliance

The review application arises primarily from the discovery of individuals working without the required immigration permission.

The Premises Licence Holder acknowledges the seriousness of this matter.

A Civil Penalty in the sum of £40,000 was issued by the Home Office.

Importantly, the licence holder has not ignored this liability.

An agreement has been reached with the Home Office for repayment of the penalty by instalments of £750 per month.

The first payment was made on 1 May 2026 and the next payment is scheduled for 15 June 2026.

Evidence of these payments can be provided to the Sub-Committee.

This demonstrates the licence holder's acceptance of responsibility and commitment to resolving the matter through lawful and constructive engagement with the Home Office.

There have been no further allegations of illegal working since the inspection.

4. Remedial Measures Implemented

Since the concerns were raised, substantial improvements have been implemented, including:

- Reduction of alcohol sales to conclude at 23:30 hours;
- Music voluntarily ending at 23:00 hours;
- Closure of customer activities by midnight;
- Continued employment of security personnel during busy trading periods and weekends;
- Staff retraining regarding licensing obligations;
- Improvements to incident recording procedures;
- Improvements to CCTV management and monitoring;
- Strengthening of management controls and compliance procedures;
- Greater oversight of staff recruitment and right to work verification procedures.

The premises is committed to maintaining these standards on a permanent basis.

5. Impact of Revocation

The Premises Licence supports not only the licence holder and his family but also a number of employees and contractors who rely upon the business for their livelihood.

The business currently employs approximately ten members of staff.

The premises also provides work opportunities for musicians, security personnel and suppliers.

Mr Silva is the father of two dependent minor children.

The business is currently meeting substantial financial obligations, including VAT liabilities and the agreed Home Office repayment plan.

Revocation of the licence would have severe financial consequences not only for the licence holder but also for innocent employees and their families.

6. Complaints and Allegations

The Premises Licence Holder respectfully notes that a number of complaints referenced throughout the review documentation remain allegations only and have not resulted in criminal convictions or enforcement findings against the premises.

The licence holder recognises the concerns raised by local authorities and remains willing to cooperate fully with any reasonable monitoring, inspection or compliance measures considered appropriate by the Responsible Authorities.

The licence holder is committed to transparency and welcomes continued engagement with Brent Council and the Metropolitan Police.

7. Proportionality

The Licensing Act 2003 requires that any action taken by the Licensing Sub-Committee must be appropriate and proportionate.

The licence holder respectfully submits that the objectives of the Licensing Act can be adequately promoted through continued monitoring and, if considered necessary, the imposition of additional conditions rather than revocation.

Revocation should be regarded as a measure of last resort.

In this case, the substantial corrective actions already undertaken demonstrate both willingness and ability to operate compliantly moving forward.

8. Conclusion

The Premises Licence Holder respectfully requests that the Licensing Sub-Committee take into account:

- The acceptance of previous shortcomings;
- The significant improvements already implemented;
- The ongoing repayment agreement with the Home Office;
- The absence of further immigration breaches;
- The employment provided by the business;
- The serious impact that revocation would have on employees, contractors and family members.

The licence holder respectfully asks the Sub-Committee to allow the premises licence to continue, subject to any reasonable conditions that the Committee considers appropriate, rather than revoking the licence.

Milson Ramos Silva
Premises Licence Holder and Designated Premises Supervisor

Date:09/06/2026

IN THE MATTER OF THE LICENSING ACT 2003

PREMISES LICENCE REVIEW
RECANTO KINGS
Unit 25, Sapcote Trading Centre, High Road, London NW10 2DH

WITNESS STATEMENT OF MILSON RAMOS SILVA

I, **Milson Ramos Silva**, of Recanto Kings, Unit 25, Sapcote Trading Centre, High Road, London NW10 2DH, make this statement in support of the premises licence review hearing.

I understand the seriousness of these proceedings and the concerns raised by the Home Office, the Metropolitan Police and Brent Council. I wish to address the Sub-Committee directly and explain the circumstances from my perspective.

First and foremost, I want to express my sincere regret for any failings that may have occurred in the operation and management of the premises. It has never been my intention to undermine the licensing objectives or to act in disregard of the law.

I came to the United Kingdom seeking a better future for my family. Recanto Kings is not simply a business to me; it represents years of hard work, sacrifice and investment. It is the primary source of income for my family and for the people who work with us.

I am the father of two minor children who depend upon me financially and emotionally. The possibility of losing the licence is deeply worrying, not only for me but also for my family, who rely entirely on the business for their livelihood.

The premises currently employs approximately ten members of staff. In addition, musicians, security personnel, suppliers and other contractors regularly receive work through the operation of the business. The closure of the premises would affect many innocent people whose income depends upon its continued operation.

I fully acknowledge that concerns have been raised regarding immigration compliance and management procedures. Since these issues were brought to my attention, I have taken active steps to improve the way the business is managed and operated.

In relation to the Civil Penalty issued by the Home Office, I wish to make clear that I have not ignored my responsibilities. I have entered into a formal payment arrangement with the Home Office and agreed to repay the penalty by monthly instalments of £750. The first payment was made on 1 May 2026 and the next instalment is due on 15 June 2026. I remain committed to complying fully with this agreement until the balance is paid in full.

Since the review process began, I have worked hard to improve standards at the premises.

Among the measures implemented are:

- Alcohol sales ending at 23:30 hours;
- Music ending at 23:00 hours;
- Customers leaving the premises by midnight;
- Continued use of security staff at weekends;
- Improved supervision and management procedures;

- Enhanced staff awareness regarding licensing responsibilities;
- Improvements to record keeping and compliance systems.

I understand that there have been complaints and concerns raised over time regarding the premises. However, I respectfully ask the Sub-Committee to consider that not every allegation made against the premises has resulted in criminal findings or enforcement action.

I firmly believe that some complaints have not accurately reflected the reality of how the business operates today. Nevertheless, I have never sought to avoid scrutiny. On the contrary, I welcome any reasonable monitoring or inspection that the authorities consider appropriate.

I want the Council, the Police and the community to have confidence that Recanto Kings can operate responsibly and in accordance with the licensing objectives.

I respectfully submit that revocation of the premises licence would be a devastating outcome for my family, my employees and everyone who depends on this business. I genuinely believe that the improvements already made demonstrate my commitment to compliance and my willingness to work constructively with all responsible authorities.

I respectfully ask the Sub-Committee to give me the opportunity to continue operating the business under any additional conditions that it considers necessary rather than revoking the licence entirely.

I assure the Sub-Committee that I have learned from the issues that have arisen and that I am fully committed to ensuring that Recanto Kings operates responsibly, lawfully and in a manner that promotes all four licensing objectives.

I make this statement honestly and sincerely and ask that it be taken into consideration during the review hearing.

Milson Ramos Silva

Date: 09/06/2026

Gmail

King of Churros <kingofchurros.contact@gmail.com>

Home Office 2587892

Legal <legal@moriartylaw.co.uk> Fri 1 May at 15:52
To: kingofchurros.contact@gmail.com <kingofchurros.contact@gmail.com>

Our Ref: **2587892**

Account No: **CPCT331267/RFPO**

Amount Due: **£40,00.00 - (from 1st May is now £39,250.00)**

Client: **Home Office**

Dear Recanto K Limited,

Re: Confirmation of the Set-Up of your repayment agreement (Our Reference: 2587892)

-

We refer to your telephone conversation with our offices and confirm our client are prepared to accept a monthly repayment plan of £750.00 per month to clear the remaining balance of your account. As agreed, we will automatically be taking payments via a VISA card.

We can confirm that we have received your first instalment of £750.00 today.

Your next monthly payment of **£750.00** is due to be taken on the **10th June 2026** and the **10th each month thereafter.**

Please do not hesitate to contact us on 0203 409 5296 should you have any questions or queries.

Yours Faithfully

Moriarty Law Limited

MoriartyLaw

Cobb House I 2-4 Oyster Lane I Byfleet IKT14 7DUI Tel: +44 (0) 203 126 4544 I Email: legal@moriartylaw.co.uk

https://www.moriartylaw.co.uk/

14:32 5G

MoriartyLaw

Moriarty Law

-£ 750

1 de mai., 15:07

Dividir a conta

Cartão	Visa ··3912
Pagamento de	Pessoal · GBP
Extrato	Transferir

Pontos ganhos	75

Trocos	£ 1
Adicionado a	Férias

Excluir da análise	
Categoria	Serviços
Gasto em Moriarty Law	£ 750

Ver todas as operações

RESTAURANT BAR SIMPRAO LTD - P30/Employer's Payment Record - MAY Tax Year 2026/27

Mustafa Yusuf <mustafa@dias-associates.co.uk> Fri 5 Jun at 14:48
To: Sueliane Chagas Barreto Ramos <recantok.info@gmail.com>

Dear Sueliane,

Please find a copy of your company's '**P30/Employer payment record'** with the amount owed to HRMC for the PAYE deductions of the last month.

[If direct debit is set-up with HMRC to collect the P30 amount every month, please ignore the following instruction]

Payment guidance

Payment Deadline: 22ND of this month.

1) CLICK HERE - HMRC PAYE

2) Select - ' I'll pay without signing in' or 'No, continue to payment options'.

3) Accounts Office reference 120PQ03632263

4) What period are you paying PAYE for: Please check your P30.

- Date at top of the P30's page

5) Employer amount to pay: Please check your P30.

- Total amount payable to HMRC is....in line number 24 in your P30 (Total amount due)

6) Choose a way to pay: Select how you want to pay- please choose Debit/credit card and follow the instruction.

Kindly confirm that you have paid your P30/Employer payment record, so we can update your accounting records. Please note that delays in payment to HMRC may lead to penalties and interest charges.

Should you have any questions please feel free to contact us.

Kind regards,

Mustafa Yusuf AFA MIPA MAAT
Senior Accountant

+44(0)7947316570
+44(0)2034412600
mustafa@dias-associates.co.uk
www.dias-associates.co.uk

RESTAURANT BAR SIMPRAO LTD TA RECANTO KINGS - Period - 2 (May) - Tax NI Report 2026 - 27.pdf

VAT payment Instructions | Period ending on March 2026

Mustafa Yusuf <mustafa@dias-associates.co.uk> Wed 6 May at 14:56
To: Sueliane Chagas Barreto Ramos <recantok.info@gmail.com>

"Taxes are the price we pay for a civilised society." - Oliver Wendell Holmes Jr.

Dear Sueliane.

Reference: RESTAURANT BAR SIMPRAO LTD

Please note that the VAT liability for the 31/03/2026 is £10,706.77 payable by 07/05/2026. Please make sure you Allow 3 working days for your payment to reach HMRC's bank account

[VAT payments can be be made by direct debit. If you know that you/we have set-up a direct debit for you to pay the VAT bills, please ignore this email)

To pay the VAT you can use one of the two methods given below:

1) **To pay by Credit or Debit card: CLICK HERE - HMRC VAT**

Click on **PAY NOW**

- No, continue to payment options
- Debit card or corporate credit card
- Continue

2) Insert your VAT Number: **511376907**

3) When does your VAT accounting period end: **31/03/2026**

4) Enter the amount to pay: **£10,706.77**

Please follow the payment instructions

2) **Alternatively, you can make a bank transfer to the following account:**

Account name: HMRC VAT
Account number: 11963155
Sort Code: 08 32 00
Reference: **511376907**

Please double check your VAT reference number before making the payment. Incorrect reference number may lead your payment to be missed out.

If you find any difficulties, please feel free to contact us.

Kind Regards

Mustafa Yusuf AFA MIPA MAAT

Senior Accountant

+44(0)7947316570
+44(0)2034412600
mustafa@dias-associates.co.uk
www.dias-associates.co.uk

Restaurant Bar Simprao_VAT Audit Report QE March 2026_Submission Receipt.pdf

Waste Managed

Invoice

Waste Managed Limited
2nd Floor
41-51 Grey Street
Newcastle upon Tyne
NE1 6EE

Invoice Date:	02/06/2026
Total Amount:	£151.81
Invoice Number:	WM-0002417411
Payment Due Date (If Paying Monthly):	14/06/2026
Account Number:	WM066546

Co Registration: 13631532
VAT Registration: 430 3573 24

Telephone: 03333 44 54 77
Email: customerservices@wastemanaged.co.uk

Invoiced To: RESTAURANT BAR SIMPRAO LTD
High Road
London
NW10 2EA

You must maintain an active Payment Method in order to comply with your agreed contractual terms. If you cancel your Direct Debit or your card details change, you may incur additional fees and your service may be suspended.
Please quote your Account Number noted above to ensure any payments are correctly allocated

Credit Lines / **Invoice Period**

Product	Quantity	Collection Frequency	Start Date	End Date
1100 Litre Bin (General Waste)	3.00	Weekly (x3)	02/06/2026	28/06/2026
Annual Pass Standard	1.00	N/A	02/06/2026	28/06/2026
Duty of Care Monthly Charge	1.00	N/A	02/06/2026	28/06/2026
240 Litre Bin (Food Bin)	2.00	Weekly (x2)	02/06/2026	28/06/2026
RI 17.5ltr Manual Feminine Hygeine Unit No Liner OW-H	3.00	Monthly	02/06/2026	28/06/2026

Net Value: -£1,164.72

Debit Lines / **Invoice Period**

Product	Quantity	Collection Frequency	Start Date	End Date
1100 Litre Bin (General Waste)	3.00	Weekly (x3)	02/06/2026	28/06/2026
240 Litre Bin (Glass)	2.00	Weekly (x2)	02/06/2026	28/06/2026
Annual Pass Standard	1.00	N/A	02/06/2026	28/06/2026
Duty of Care Monthly Charge	1.00	N/A	02/06/2026	28/06/2026
240 Litre Bin (Food Bin)	2.00	Weekly (x2)	02/06/2026	28/06/2026
RI 17.5ltr Manual Feminine Hygeine Unit No Liner OW-H	3.00	Monthly	02/06/2026	28/06/2026

Net Value: £1,291.23

Net Invoice Value (excluding VAT):	**£126.51**
VAT (20%):	**£25.30**
Invoice Total:	**£151.81**

To make payment by bank transfer please use the following bank details:

SORT CODE:	20-40-89
ACCOUNT NUMBER:	20315125
BANK ADDRESS:	1 Churchill Place, Canary Wharf, London E145HP