

Guildhall Gainsborough  
Lincolnshire DN21 2NA  
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## AGENDA

**Please Note: There will be a Member Briefing held at 10.00am**

**Licensing Sub Committee**  
**Friday, 10th October, 2025 at 10.30 am**  
**Council Chamber - The Guildhall**

**Members:** Councillor Stephen Bunney  
Councillor Maureen Palmer  
Councillor Jim Snee

**1. To Elect a Chairman for this Meeting Only**

**2. Apologies for Absence**

**3. Members' Declarations of Interest**

*Members may make any declarations of interest at this point but may also make them at any time during the course of the meeting.*

**4. Procedure**

(PAGES 3 - 4)

Please note the procedure to be taken by the committee (which is attached to this agenda marked A).

**5. Note:**

This licensing authority will only allow licensing decisions to be taken by a minimum of three Councillors. In the event of one member being unable to attend, their place will be substituted by another member. In the event of this substitution taking place all parties will be informed of the change of membership at the beginning of the hearing.

**6. Licence Hearing**

(PAGES 5 - 134)

Licence Number: 32UHB50224

Hearing Type: Review of a Premises Licence

Applicant: Lincolnshire Police

Premises: Today's Extra, 2 Horsemarket, Caistor, Market  
Rasen, LN7 6UP

Premises Licence Holder: Grantham Curry Pot Ltd

Paul Burkinshaw  
Head of Paid Service  
The Guildhall  
Gainsborough

Tuesday, 30 September 2025

## Procedure for Hearings Licensing Act 2003

### 1. Election of Chair

### 2. Chair's welcome and opening remarks

- Name of applicant and the premises address
- The introduction of the Members of the sub-committee and officers
- Introduction of applicant and objectors
- Chair to explain that all parties have been given notice to attend the hearing and that the hearing will proceed notwithstanding a party's failure to attend the hearing

Legal Advisor to explain the procedure to the parties

Senior Licensing Officer will present the application which will include any previous licensing history.

### 3. Applicant to present case

- The applicant or their representative present their case
- The applicant or their representative will then call any witnesses and/or give evidence in support of their case
- The objector(s) or their representative may then question the applicant and their witnesses
- The Members of the sub-committee may ask questions of the applicant and their witnesses
- The applicant or their representative will then be given a final opportunity to ask any further questions of their witnesses to clear up any points raised in the earlier questioning.

### 4. The Objector's case

This procedure will be followed for each individual objector:

- The objector or their representative will give their reasons for objecting to the application
- The objector or their representative will then call any witnesses
- The applicant or their representative may then question the objector or their representative and any witnesses
- The Members of the sub-committee may ask questions of the objector or their representative and any witnesses
- The objector or their representative will then be given a final opportunity of asking any further questions of their witnesses to clear up any points raised in the earlier questioning

### 5. Amendments

The Applicant is asked by the Chair of the sub-committee whether, in light of the objections, they wish to amend the application (when they retire Members will consider only the application before them at that time).

If the applicant wishes to amend the application or indicates that they are prepared for Members to give consideration to an amended application (if Members are minded to refuse the original application) the objector(s) are to be given the opportunity to comment on the amended application.

## **6. Closing Statement or Summary**

The objector(s) can summarise any points they wish to make and comment briefly on the applicant's replies to questions. They cannot introduce any new issues at this stage.

The applicant can summarise any points they wish to make and comment briefly on the objector's replies to questions. They cannot introduce new issues at this stage.

## **7. Conclusion**

The Chair will then ask the Legal Advisor whether there are any other matters to be raised or resolved before the sub-committee retires to begin its deliberations. The sub-committee will exclude the press and public from its deliberations and its decision making.

The Chair will advise the hearing that they will retire to consider the application and that the Legal Advisor will be retiring with them but will not take part in the deliberation.

Once a decision has been made everybody is invited back in and the Chair announces the decision and will give reasons for the decision including any conditions that have been attached and the right of appeal if necessary. The decision will subsequently be formally notified to the Applicant and the Legal Advisor in writing by the Clerk to the Committee within 5 working days.

***N.B. if legal advice is given to Members by the Legal Advisor then this advice will be repeated in summary form by the Legal Advisor when the public are re-admitted.***

***If any party to the hearing or the Senior Licensing Officer are required to address the Committee during their deliberations, all parties will be invited to hear these issues.***





**Licensing Sub Committee**

**Friday, 10 October 2025**

**Subject: Review of a Premises Licence**

Report by:

Bill Cullen  
Interim Head of Paid Service

Contact Officer:

Kimble Enderby  
Senior Licensing and Community Safety Officer  
[kimble.enderby@west-lindsey.gov.uk](mailto:kimble.enderby@west-lindsey.gov.uk)

Purpose / Summary:

This report is being put before the Members of the Licensing Sub-Committee for them to determine the outcome of this review.

## **RECOMMENDATION(S):**

That Members take into account all the information put before them, both within this report and presented to them at the hearing, by all parties in attendance.

Members will then need to decide which of the options presented to them in section 6 of this report are appropriate in determining this application, taking into account The Licensing Act 2003, s.182 Statutory Guidance and West Lindsey District Council's Licensing Policy.

## IMPLICATIONS

**Legal:** The Licensing Act 2003, Schedule 5, Part 1 makes provision for the applicant of a premises licence and the licence holder and any other person who made relevant representations to appeal the outcome of the hearing.

Any appeal must be made to the Magistrates Court for the local justice area in which the premises concerned is situated.

Any appeal must be commenced within 21 days beginning with the day on which the appellant was notified by the authority of the decision appealed against.

**Financial:** N/A

**Staffing:** N/A

**Equality and Diversity including Human Rights:**

Article 6 – Right to a fair hearing in public before an independent and impartial tribunal.

**Data Protection Implications:** Personal data within the report appendices has been redacted where relevant.

**Climate Related Risks and Opportunities:** N/A

**Section 17 Crime and Disorder Considerations:**

(S.17 Crime and Disorder Act 1998) - (1) Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area.

**Health Implications:** N/A

**Title and Location of any Background Papers used in the preparation of this report:**

Licensing Act 2003

WLDC Statement of Licensing Policy

Guidance made under section 182 of the Licensing Act 2003

<https://www.west-lindsey.gov.uk/licensing/licensing-gambling-policies/licensing-policy>

**Risk Assessment:**

**Call in and Urgency:**

**Is the decision one which Rule 14.7 of the Scrutiny Procedure Rules apply?**

i.e. is the report exempt from being called in due to urgency (in consultation with C&I chairman)

**Yes**

☐

**No**

☐

**Key Decision:**

A matter which affects two or more wards, or has significant financial implications

**Yes**

☐

**No**

☐

# WEST LINDSEY DISTRICT COUNCIL

## LICENSING ACT 2003

**Licence Number:** 32UHB50224.

**Hearing Type:** Review of a Premises Licence.

**Applicant:** Lincolnshire Police.

**Premises:** Today's Extra, 2 Horsemarket, Caistor, Market Rasen, LN7 6UP.

**Premises Licence Holder:** Grantham Curry Pot Ltd.

**Hearing Date:** 10 October 2025

### 1 The Application for Review

- 1.1.1 An application for review of the Premises Licence for Today's Extra, 2 Horsemarket, Caistor, Lincolnshire LN7 6UP has been made by Lincolnshire Police which was received on 23<sup>rd</sup> July 2025. Lincolnshire Police are a Responsible Authority, as defined by Section 13(4) of the Licensing Act 2003 and are therefore entitled to apply for a review of a licence when of the opinion a premises is failing to operate with a view to promoting one or more of the licensing objectives. A copy of the application, outlining the grounds for review is attached at Appendix 1.
- 1.1.2 From the information detailed in the review application, Lincolnshire Police have concluded that there is evidence to show the licensing objective for the prevention of crime and disorder is being undermined.
- 1.1.3 Lincolnshire Police initially visited the premises on 27<sup>th</sup> September 2024 where a member of staff was found to have no status in the UK and no right to work. Alongside this they identified non-compliance with conditions of the premises licence. They revisited the premises on 7<sup>th</sup> November 2024 discovering that non-compliance issues still remained. The final visit made by Lincolnshire Police was on 17<sup>th</sup> June 2025, the male encountered on the first visit was again encountered in the store, attempted to make off from officers, was detained and admitted to working at the premises despite still having no right to work in the UK. Full details of these visits can be found within the review application submitted by Lincolnshire Police
- 1.2 Additional supporting information in the form of statements, interview notes and pocket note book entries from Lincolnshire Police, are made available for Members of the Licensing Sub-Committee. This information can be found within appendices A,B,C,D,E,F,G,and H. All sensitive or restricted information has been reacted by Lincolnshire Police prior to submission of their review application.

- 1.4.1 Section 51(3)(a)(b) of the Licensing Act 2003 requires the applicant of a premises review, to notify each Responsible Authority by way of a Notice containing details of the review application. The Licensing Authority must also advertise the review application and invite representations to be made by Other Persons and Responsible Authorities.

## **2 The Premises**

- 2.1 Grantham Curry Pot Ltd holds the premises licence (32UHB50224) authorising the provision of late-night refreshment and the sale by retail of alcohol for consumption off the premises only. A premises licence was originally issued in September 2005 and the latest change made to this licence was an application for the variation to the person holding the position of DPS. This application was made on 31<sup>st</sup> October 2024 (requesting immediate effect). A copy of the premises licence including any attached conditions can be found at Appendix 2.

## **3 Representations – Responsible Authorities**

- 3.1 There have been no representations from other Responsible Authorities within the statutory timescale.

## **4 Representations – Other persons**

- 4.1 There have been no representations received from any Other Persons within the statutory timescale.

## **5 Considerations**

- 5.1 With respect to the review application, Members of the Licensing Sub-Committee must satisfy themselves whether or not the licence holder is satisfactorily promoting the licensing objective in relation to the prevention of crime and disorder.
- 5.2 The authority may only interfere with the licence if it considers it appropriate in order to promote the licensing objectives and if it does interfere, then it must do so proportionately.
- 5.3 In considering the application for review and making its decision the Licensing Sub-Committee must do so in line with:
- The Licensing Act 2003
  - The Section 182 Guidance made under the Act
  - The Licensing Authority's Statement of Licensing Policy
- 5.4 When considering the application and any representations received, attention is drawn to the Licensing Authority's Policy which can be found at the link below by clicking on the Download Tab, then downloading the Policy:  
<http://www.west-lindsey.gov.uk/businesses/licensing/licensing-and-gambling-policies/licensing-policy/104810.article>
- 5.5 Attention is also drawn to the contents of the section 182 statutory guidance which can be found at the link below:

## 6 Options

- 6.1 The Licensing Sub-Committee must, having regard to the application for review, take such steps, if any, it considers appropriate and proportionate for the promotion of the licensing objectives.
- 6.2 The steps available are:
- to modify the conditions of the licence
  - to exclude a licensable activity from the scope of the licence
  - to remove the designated premises supervisor from the licence
  - to suspend the licence for a period not exceeding 3 months
  - to revoke the licence

For the avoidance of doubt the conditions of a licence are modified if any of them is altered or omitted or any new condition is added.

Alternatively, the Sub-Committee may consider that no action is required or that a warning should be issued and/or recommend improvement within a particular period of time. Such informal warnings, in writing, are an important mechanism for ensuring the licensing objectives are effectively promoted.

- 6.3 Any action the Licensing Sub-Committee resolve to implement must be appropriate and proportionate to the promotion of the licensing objectives in the circumstances that gave rise to the application for review.
- 6.4 **N.B.** Whatever decision the Members of the Licensing Sub-Committee arrive at, they are reminded about the comments made in a court case, known as Hope and Glory, in relation to reasons for their decision making. The comments noted from this case stated: “*The fuller and clearer the reasons, the more force they are likely to carry*”. Therefore taking these comments into account, Members are strongly advised to give good, clear, justifiable reasons in relation to their decision, which will have more chance of being upheld, should the decision be appealed against.
- 6.5 If the Licensing Sub-Committee resolve to implement any of the steps set out at 6.2 above, the action will not take effect until the end of the period for appeal (21 days) or if the decision is appealed against, until the appeal is disposed of.

## 7 List of Associated Papers

Appendix 1 - Application for Review.

Appendix 2 - Premises Licence – Today’s Extra, Caistor.

Appendices - A, B, C, D, E,F,G,H. Statements, interview notes and pocket note book entries from Lincolnshire Police.

## **8 Background Papers**

Licensing Act 2003  
Section 182 Government Guidance  
WLDC Statement of Licensing Policy

**Application for the review of a premises licence or club premises certificate under the  
Licensing Act 2003**

**PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST**

Before completing this form please read the guidance notes at the end of the form.  
If you are completing this form by hand please write legibly in block capitals. In all cases ensure  
that your answers are inside the boxes and written in black ink. Use additional sheets if necessary.  
You may wish to keep a copy of the completed form for your records.

I Paul Gibson (Chief Constable of Lincolnshire Police)

*(Insert name of applicant)*

**apply for the review of a premises licence under section 51 / apply for the review of a club  
premises certificate under section 87 of the Licensing Act 2003 for the premises described in  
Part 1 below (delete as applicable)**

**Part 1 – Premises or club premises details**

<b>Postal address of premises or, if none, ordnance survey map reference or description</b>  Today's 2 Horsemarket Caistor Market Rasen	
<b>Post town</b> Lincolnshire	<b>Post code (if known)</b> LN7 6UP

<b>Name of premises licence holder or club holding club premises certificate (if known)</b> Grantham Curry Pot Ltd
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<b>Number of premises licence or club premises certificate (if known)</b> 32UHB50224
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**Part 2 - Applicant details**

I am

Please tick ✓ yes

1) an individual, body or business which is not a responsible  
authority (please read guidance note 1, and complete (A)  
or (B) below)

2) a responsible authority (please complete (C) below)



3) a member of the club to which this application relates  
(please complete (A) below)



**(A) DETAILS OF INDIVIDUAL APPLICANT** (fill in as applicable)

Please tick ✓ yes

Mr

Mrs

Miss

Ms

Other title  
(for example, Rev)

**Surname**

**First names**

Please tick ✓ yes

**I am 18 years old or over**

**Current postal  
address if  
different from  
premises  
address**

**Post town**

**Post Code**

**Daytime contact telephone number**

**E-mail address  
(optional)**

**(B) DETAILS OF OTHER APPLICANT**

Name and address

Telephone number (if any)

E-mail address (optional)

**(C) DETAILS OF RESPONSIBLE AUTHORITY APPLICANT**

Lincolnshire Police Alcohol Licensing Police Headquarters Deepdale Lane, Nettleham, Lincolnshire LN2 2LT
Telephone number (if any) 101 - Lincolnshire
E-mail address (optional) Countylicensinggroup@lincs.police.uk

**This application to review relates to the following licensing objective(s)**

- |   |                                     |
|---|-------------------------------------|
|   | Please tick one or more boxes ✓     |
| 1) the prevention of crime and disorder | <input checked="" type="checkbox"/> |
| 2) public safety                        | <input type="checkbox"/>            |
| 3) the prevention of public nuisance    | <input type="checkbox"/>            |
| 4) the protection of children from harm | <input type="checkbox"/>            |

**Please state the ground(s) for review (please read guidance note 2)**

This review application relates to a premises which operates as a general convenience store offering food and drink to the local community, it has been granted a Premises Licence 32UHB50224 by West Lindsey District Council authorising the sale of alcohol for consumption off the premises. The sale of alcohol is authorised between 06:00 and midnight 7 days a week.

The current premises licence holder is Grantham Curry Pot Ltd and designated premises supervisor is Rajith Subramaniam. The sole director of Grantham Curry Pot Ltd is Arumugam Kalamohan.

Lincolnshire Police have obtained evidence which indicates that the management of these premises has been operating it in such a manner that amounts to criminal activity and thus undermines the licencing objective of the prevention of crime and disorder. There is also clear evidence of non-compliance with the conditions set out on the premises licence.

**Revised Guidance issued under Section 182 of the Licensing Act 2003**

*Section 2.1 Licensing authorities should look to the Police as the main source of advice on crime and disorder.*

*Section 11.23 states where the premises are found to be trading irresponsibly, the licensing authority should not hesitate, where appropriate to do so, to take tough action to tackle the problems at the premises and, where other measures are deemed insufficient, to revoke the licence.*

*Section 11.24 states that reviews do not have to be directly linked or connected with the licensable activities at any premises.*

*Section 11.25 states that in any case, it is for the licensing authority to determine whether the problems associated with the alleged crimes are taking place on the premises and affecting the promotion of the licensing objectives.*

*Section 11.26 states that where the licensing authority is conducting a review on the grounds that the premises have been used for criminal purposes, it is solely to determine what steps should be taken in connection with the premises licence, for the promotion of the crime prevention objective. The licensing authority's duty is to take steps with a view to the promotion of the licensing objectives and the prevention of illegal working in the interests of the wider community and not those of the individual licence holder.*

*Section 11.27 states that there is certain criminal activity that may arise in connection with licensed premises which should be treated particularly seriously. These are the use of licensed premises;*

*- for employing a person who is disqualified from that work by reason of their immigration status in the UK.*

*Section 11.28 states that it is envisaged that licensing authorities, the police, the Home Office (Immigration Enforcement) and other law enforcement agencies, which are responsible authorities, will use the review procedures effectively to deter such activities and crime. Where reviews arise and the licensing authority determines that the crime prevention objective is undermined through the premises being used to*

further crimes, it is expected that revocation of the licence – even in the first instance – should be seriously considered.

**West Lindsey District Council's statement of Licencing policy (December 2020) has also been considered and the following points are deemed relevant:**

1.7 In undertaking its licensing function, the Licensing Authority will have regard to other legislation, including, but not exclusively:

- Section 17 of the Crime and Disorder Act 1998: requires the Council to take all reasonable steps to reduce crime and disorder within the district.
- Immigration Act 2016

5.1.1 The Licensing Authority will carry out its licensing functions with a view to promoting the prevention of crime and disorder and will seek to ensure that licensees take measures to regulate the behaviour of persons whilst on their premises, or in the immediate vicinity of the premises.

5.1.2 In addition to the requirement for the Licensing Authority to promote this licensing objective, it also has a duty under Section 17 of the Crime and Disorder Act 1998 to Page 15 of 40 exercise its functions with due regard to the likely effect of the exercise of those functions on, and do all it reasonably can to prevent, crime and disorder in the District.

5.1.5 CCTV remains one of the most effective measures for reducing crime and disorder. The Licensing Authority expects premises that retail alcohol for consumption on or off the premises will have an effective CCTV system installed that operates in compliance with the requirements of Lincolnshire Police.

5.3.5 The following examples of control measures are given to assist applicants who may need to take account of them in their operating schedule, having regard to their particular type of premises and/or activities:

- Appropriate instruction, training and supervision of those employed or engaged to prevent incidents of public nuisance e.g. to ensure customers leave quietly,
- Provision of CCTV

8.19.1 Section 36 of and Schedule 4 to the Immigration Act 2016 made a number of amendments to the Licensing Act 2003 to introduce immigration safeguards in respect of licensing applications made in England and Wales on or after 6 April 2017. The intention of these changes is to prevent illegal working in premises licensed for the sale of alcohol or late night refreshment.

8.19.5 The statutory prevention of crime and disorder licensing objective in the Licensing Act 2003 includes the prevention of immigration crime and the prevention of illegal working in licensed premises. The licensing authority will work in partnership with the Home Office (Immigration Enforcement) and Lincolnshire Police with a view to preventing illegal working in premises licensed for the sale of alcohol or late night refreshment.

8.19.6 The licensing authority will have regard to any guidance issued by the Home Office in relation to the immigration related provisions now contained in the Licensing Act 2003.

**Crime and Disorder Act 1998 Section 17**

*Duty to consider crime and disorder implications.*

*(1) Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent,*

*(a) crime and disorder in its area (including anti-social and other behaviour adversely affecting*

*the local environment); and*

*(b) the misuse of drugs, alcohol and other substances in its area, and*

*(c) re-offending in its area*

*(2) This section applies to each of the following—*

*.a local authority .....*

**Please provide as much information as possible to support the application** (please read guidance note 3)

The premises licence for Today's in Caistor has been under the control of Mr Kalamohan since September 2023 when the licence was transferred to AK Lincoln Ltd - a company of which Mr Kalamohan is the sole director. At the same time a vary DPS application was received naming Mr Kalamohan as the new designated premises supervisor.

In November 2023 a variation application was received to make amendments to the licensable hours and also to update and modernise the conditions held within the premises licence. The update to the licence conditions was instigated by Mr Kalamohan's agent and was welcome as there had previously been no annex 2 conditions at all. The conditions offered seemed appropriate for the operating style of the business and were clear and easy to understand.

In April 2024 the premises licence was transferred into a different company name – Grantham Curry Pot Ltd. Mr Kalamohan is also the sole director of this company.

On 27<sup>th</sup> September 2024 Police and council licensing teams carried out a joint visit to check compliance with the premises licence. There was a male working in the shop who identified himself to officers and was eventually found to have no status in the UK and thus no right to work. Police were directed by Home Office Immigration to arrest this individual. Officers also checked compliance with the premises licence and found some cause for concern. The CCTV appeared to be recording but did not retain for the required period only saving footage for 23 days as opposed to 28 as per the premises licence. There was a comprehensive training folder in relation to age restricted sales but unfortunately this hadn't been signed by staff including the male working at the time of the visit.

Following this visit PC Casey emailed Mr Kalamohan to outline the concerns found but no reply was forthcoming. PC Casey reported the matter of the illegal worker to Immigration and the evidence was sent to the civil penalty team for their consideration.

**(See appendix A – Statement of PC Casey and appendix B – Pocket Notebook Entry of PC Casey dated 27.09.24).**

A further vary DPS application was received on 4<sup>th</sup> November 2024 and sought to change the DPS from Mr Kalamohan to Mr Rajith Subramaniam.

On 7<sup>th</sup> November 2024 Police reattended with Immigration Officers. On this occasion the new DPS, Mr Subramaniam, was present. Mr Subramaniam was not able to operate the CCTV as he said he could not locate the mouse. The staff training manual was still unsigned and the DPS authority to sell alcohol was out of date and did not have names of current employees or the DPS.

**(See appendix C – Pocket Notebook Entry of PC Casey dated 07.11.24)**

On 17<sup>th</sup> June 2025 the Police Licensing Officer attended Today's again, this time with the Community Beat Manager – PC Turner. Upon entering Police encountered the same male that had been working illegally at the premises on 27<sup>th</sup> September 2024. On recognising the Officer's, the male fled the shop but was later detained after being found hiding behind a parked vehicle on a nearby driveway. Checks with immigration determined that this male was not liable to be detained any further but did confirm that he still had no permission to work in the UK. Police spoke at length with the male via a telephone interpreting service. During the conversation the male admitted that he had returned to the premises and had been working there for 2 weeks over 2-3 days each week. He disclosed that he was paid £6.00 per hour in cash which is considerably less than the national minimum wage of £12.21 per hour for over 21's

PC Casey had a brief telephone conversation with Mr Kalamohan and explained that CCTV would be requested via email as the staff on site were unable to operate the system. After this visit PC Casey requested footage from the premises by emailing Mr Kalamohan and Mr Subramaniam (DPS). Footage was requested for one hour across all cameras at the time of the visit. Footage was provided in the coming days, but it only displayed 8 cameras', one of which was not working so appeared blacked out. Of the footage provided there were no cameras covering the rear section of the shop and nothing to show what the illegal worker was doing prior to Police arrival. The illegal worker had been in the rear section of the shop upon PC Casey's arrival. During a phone call to Mr Kalamohan PC Casey asked if there were cameras covering the rear of the shop to which he said there weren't, he also clarified that the eighth blank camera was currently not working but only covered the outside of the shop. PC Casey re-attended the shop on 10<sup>th</sup> July and was shown the CCTV by a staff member on the premises. PC Casey noted that there was a total of 16 cameras across the shop and that the rear of the premises was very well covered. On checking the retention period of the footage, it was identified that there was no footage prior to 4<sup>th</sup> July meaning that it was only keeping footage for 7 days and not the 28 required on the premises licence.

**(See appendix D Statement of PC Casey dated 15.07.25, appendix E Illegal working interview notes, appendix F Pocket Notebook Entry of PC Casey dated 17.06.25 and appendix G Pocket Notebook Entry of PC Casey dated 10.07.25)**

During the above period PC Casey has exchanged several emails with Mr Kalamohan and/or the DPS. The DPS has never responded to emails but the chain can be seen in Appendix H. Mr Kalamohan has responded but has never acknowledged the non-compliance or discovery of illegal workers. **(See appendix H email chain between 01.10.24 and 10.07.25).**

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 must carry out various checks to ensure that their staff are legally allowed to work.

Where an employer pays wages to illegal workers off record with no tax or national insurance deductions which are then deliberately omitted from an employers End of Tax Year P35 returns to HMRC, the employer may be dealt with by means of the Fraud Act 2006. Similarly, HMRC may take action as a civil proceedings case and raise a tax debt against the business.

Illegal workers are more than likely poorly paid for the hours they are required to work and are not subject to the benefit of a minimum wage or restricted hours as prescribed in law. Nor are they afforded the benefit of the protections offered by UK employment legislation and are therefore often exploited.

Lincolnshire has led the way with how illegal working within licenced premises and its impact on how the crime prevention objective should be viewed. The stated case of East Lindsey District Council v Abu Hanif in 2016 involved an illegal worker in a licenced premises in Lincolnshire in April 2014, where a civil penalty was later issued by immigration. The premises licence was reviewed and revoked, an appeal followed which was successful, based on the argument that a civil penalty was not a prosecution and so did not concern the crime prevention objective. East Lindsey District Council then appealed that decision by way of a case stated, arguing that it was not necessary for a crime to have been reported, prosecuted, or established in a court of law in order for the crime prevention objective to be engaged. That the licensing objectives were prospective and were concerned with the avoidance of harm in the future. Mr Justice Jay upheld the councils appeal, citing defrauding the revenue and exploitation of vulnerable individuals by not paying minimum wage as evidence of the commission of criminal offences, and the fact that the employee could not provide the required paperwork as clear inference that Mr Hanif well knew that he was employing an illegal worker.

Lincolnshire Police have two main concerns with this premises the first being the illegal working and the second the consistent non-compliance.

The non-compliance is disappointing especially since Mr Kalamohan himself suggested the very conditions that he is now breaching. Breach of those conditions is an offence under s.136 Licensing Act 2003.

Whilst the DPS is previously not known to have raised concerns for us in Lincolnshire, Mr Kalamohan has been subject to other licence review hearings in the County. Those reviews have been instigated for the same reasons as this one, illegal working and non-compliance – it appears as though lessons are not being learnt.

In 2018 Lincolnshire Police requested a review of the premises licence at Today's Express, 20 Market Place, Grantham after the discovery of an illegal worker at the shop and non-compliance with the conditions on the premises



licence. South Kesteven District Council's licensing committee made the decision to revoke this licence. Home Office Immigration also served a £10,000 penalty in relation to this matter.

In 2020 Lincolnshire Police submitted a review in relation to Today's Extra 50 Kesteven Road, Stamford again due to the discovery of an illegal worker and s.136 Licensing Act 2003 offences. The licensing committee, on this occasion, opted to implement additional conditions on the premises licence.

At the time of both the reviews the premises licence holder was either Mr Kalamohan himself or a company of which he was the director. Since these reviews there have also been concerns about illegal working and non-compliance at Today's Red Lion Square, Stamford and Today's Kesteven Road, Stamford. Both premises are also under the control of Mr Kalamohan/Mohan Retail Ltd.

Lincolnshire Police feel that the above information demonstrates that either Mr Kalamohan still does not understand the Licensing Act 2003, the licensing objectives and associated legislation *or* Mr Kalamohan has a total disregard for these matters. Either way, Lincolnshire Police deem the management of the premises to be unacceptable and feel that there have been sufficient and appropriate warnings/advice given to Mr Kalamohan. Lincolnshire Police cannot identify any other conditions that could be imposed to prevent the highlighted issues from recurring.

Lincolnshire Police respectfully request that the licensing sub-committee consider revocation of the premises licence.

Have you made an application for review relating to the premises before

Please tick ✓ yes

N.A

If yes please state the date of that application

Day	Month	Year
<input type="text"/>	<input type="text"/>	<input type="text"/>

**If you have made representations before relating to the premises please state what they were and when you made them**

There have not been previous representations in relation to this premises however, Mr Kalamohan is no stranger to the review processes as described above.

Please tick ✓

yes

- I have sent copies of this form and enclosures to the responsible authorities and the premises licence holder or club holding the club premises certificate, as appropriate
- I understand that if I do not comply with the above requirements my application will be rejected

**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.**

**Part 3 – Signatures** (please read guidance note 4)

**Signature of applicant or applicant's solicitor or other duly authorised agent** (please read guidance note 5). **If signing on behalf of the applicant please state in what capacity.**

Signature



.....

Date 22.07.25

.....

Capacity for and on behalf of Chief Constable of Lincolnshire Police

.....

**Contact name (where not previously given) and postal address for correspondence associated with this application** (please read guidance note 6)

**Post town**

**Post Code**

**Telephone number (if any)**

**If you would prefer us to correspond with you using an e-mail address your e-mail address (optional)**

**Notes for Guidance**

1. A responsible authority includes the local police, fire and rescue authority and other statutory bodies which exercise specific functions in the local area.
2. The ground(s) for review must be based on one of the licensing objectives.
3. Please list any additional information or details for example dates of problems which are included in the grounds for review if available.
4. The application form must be signed.
5. An applicant's agent (for example solicitor) may sign the form on their behalf provided that they have actual authority to do so.
6. This is the address which we shall use to correspond with you about this application.

Licensing Act 2003

# Premises Licence

## 32UHB50224

### Part 1 - Premises Details

#### POSTAL ADDRESS OF PREMISES, OR IF NONE, ORDNANCE SURVEY MAP REFERENCE OR DESCRIPTION

##### Today's Extra

2 Horsemarket, Caistor, Lincolnshire, LN7 6UP.

#### WHERE THE LICENCE IS TIME LIMITED THE DATES

Not applicable

#### LICENSABLE ACTIVITIES AUTHORISED BY THE LICENCE

- provision of late night refreshment
- the sale by retail of alcohol

#### THE TIMES THE LICENCE AUTHORISES THE CARRYING OUT OF LICENSABLE ACTIVITIES

Activity (and Area if applicable)	Description	Time From	Time To
L. Late night refreshment (Indoors)	Monday to Sunday	11:00pm	Midnight
M. The sale by retail of alcohol for consumption OFF the premises only	Monday to Sunday	6:00am	Midnight

#### THE OPENING HOURS OF THE PREMISES

Description	Time From	Time To
Monday to Sunday	6:00am	Midnight

#### WHERE THE LICENCE AUTHORISES SUPPLIES OF ALCOHOL WHETHER THESE ARE ON AND / OR OFF SUPPLIES

- M. The sale by retail of alcohol for consumption OFF the premises only

### Part 2

#### NAME, (REGISTERED) ADDRESS, TELEPHONE NUMBER AND EMAIL (WHERE RELEVANT) OF HOLDER OF PREMISES LICENCE

Grantham Curry Pot Ltd  
80 White Lion Road, Amersham, Buckinghamshire, HP7 9JS.  
[mohanretail@hotmail.co.uk](mailto:mohanretail@hotmail.co.uk)

#### REGISTERED NUMBER OF HOLDER, FOR EXAMPLE COMPANY NUMBER, CHARITY NUMBER (WHERE APPLICABLE)

Grantham Curry Pot Ltd 14192497

#### NAME, ADDRESS AND TELEPHONE NUMBER OF DESIGNATED PREMISES SUPERVISOR WHERE THE PREMISES LICENCE AUTHORISES THE SUPPLY OF ALCOHOL

Rajith SUBRAMANIAM Flat B rear, 2 Horsemarket, Caistor, Lincolnshire, LN7 6UP.

Licensing Act 2003

**32UHB50224**

## Premises Licence

PERSONAL LICENCE NUMBER AND ISSUING AUTHORITY OF PERSONAL LICENCE HELD BY DESIGNATED PREMISES SUPERVISOR  
WHERE THE PREMISES LICENCE AUTHORISES FOR THE SUPPLY OF ALCOHOL

Licence No. Z01N08389H/2

Issued by Waltham Forest

### ANNEXES

#### **Mandatory Conditions Supply of alcohol (Off-Licensed Premises)**

No supply of alcohol may be made under this licence:

- at a time when there is no designated premises supervisor in respect of the premises licence or,
- at a time when the designated premises supervisor does not hold a personal licence or his personal licence is suspended.

Every supply of alcohol under the premises licence must be made or authorised by a person who holds a personal licence.

Any supply of alcohol for consumption off the premises must be in a sealed container.

The premises licence holder or club premises certificate holder shall ensure that an age verification policy applies to the premises in relation to the sale or supply of alcohol. The policy must require individuals who appear to the responsible person to be under 18 years of age (or such older age as may be specified in the policy) to produce on request, before being served alcohol, identification bearing their photograph, date of birth and a holographic mark.

#### **CONDITIONS CONSISTENT WITH THE OPERATING SCHEDULE**

A CCTV camera system, capable of providing good quality images in all lighting conditions, shall be used covering the interior and the immediate exterior (entrance) of the premise. Images will be retained for a period of at least 28 days and be made available to the Police and Authorised Officers upon reasonable written request for evidential purposes, in accordance with the relevant data protection legislation (currently GDPR 2018).

The CCTV recording equipment shall be kept in a secure environment under the control of the premises licence holder (PLH) and/or another named responsible individual.

The DPS and staff will be vigilant and monitor the area immediately outside the shop to check

Licensing Act 2003

**32UHB50224**

## **Premises Licence**

### ANNEXES continued ...

that youths are not causing annoyance by congregating.

Spirits will be kept behind the counter

Any incidents of crime and disorder at or immediately outside the premises, witnessed by staff, will be recorded in an incident book kept at the shop. This book will be made available for inspection by the Police and the other responsible authorities.

Deliveries to the shop will be arranged during hours to prevent public nuisance.

A notice(s) will be on display in the shop asking customers to leave the shop quietly and not to drop any litter on the floor.

Staff will monitor the area immediately outside the shop on a regular basis to check for, and to dispose of, any litter.

Challenge 25 shall be used and signage will be on display.

Alcohol will only be sold to people who can satisfy or prove to the seller that they are 18 years old or over. The only acceptable form of ID will be a passport, photo driving licence, a PASS accredited proof of age card, or other form of photo ID as recommended by Trading Standards.

A refusals register (for the sale of alcohol) will be used and be made available for inspection by responsible authorities.

A notice(s) shall be displayed in the premises where they can be seen clearly to advise customers that it is unlawful for persons under 18 to purchase alcohol or for any persons to purchase alcohol on behalf of a person under 18 years of age.

All staff selling alcohol will be trained on the prevention of underage sales. Training will be delivered on a regular basis (every 12 months) and records will be made available for inspection by Lincolnshire Police and other Authorised Officers.

Licensing Act 2003

**32UHB50224**

## **Premises Licence**

ANNEXES continued ...

**CONDITIONS ATTACHED AFTER A HEARING BY THE LICENSING AUTHORITY**

Not Applicable.

Licensing Act 2003

**32UHB50224**

# Premises Licence Summary

## Premises Details

### POSTAL ADDRESS OF PREMISES, OR IF NONE, ORDNANCE SURVEY MAP REFERENCE OR DESCRIPTION

#### Today's Extra

2 Horsemarket, Caistor, Lincolnshire, LN7 6UP.

### WHERE THE LICENCE IS TIME LIMITED THE DATES

Not applicable

### LICENSABLE ACTIVITIES AUTHORISED BY THE LICENCE

- provision of late night refreshment
- the sale by retail of alcohol

### THE TIMES THE LICENCE AUTHORISES THE CARRYING OUT OF LICENSABLE ACTIVITIES

Activity (and Area if applicable)	Description	Time From	Time To
L. Late night refreshment (Indoors)	Monday to Sunday	11:00pm	Midnight
M. The sale by retail of alcohol for consumption OFF the premises only	Monday to Sunday	6:00am	Midnight

### THE OPENING HOURS OF THE PREMISES

Description	Time From	Time To
Monday to Sunday	6:00am	Midnight

### WHERE THE LICENCE AUTHORISES SUPPLIES OF ALCOHOL WHETHER THESE ARE ON AND / OR OFF SUPPLIES

- M. The sale by retail of alcohol for consumption OFF the premises only

### NAME, (REGISTERED) ADDRESS OF HOLDER OF PREMISES LICENCE

Grantham Curry Pot Ltd

80 White Lion Road, Amersham, Buckinghamshire, HP7 9JS.

### REGISTERED NUMBER OF HOLDER, FOR EXAMPLE COMPANY NUMBER, CHARITY NUMBER (WHERE APPLICABLE)

Grantham Curry Pot Ltd

14192497

### NAME OF DESIGNATED PREMISES SUPERVISOR WHERE THE PREMISES LICENCE AUTHORISES THE SUPPLY OF ALCOHOL

Rajith SUBRAMANIAM

### STATE WHETHER ACCESS TO THE PREMISES BY CHILDREN IS RESTRICTED OR PROHIBITED

Not applicable



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

URN

Statement of: **Rebeka Casey**Age if under 18: **018** (if over 18 insert 'over 18')Occupation: **Police Constable 1299**

This statement (consisting of 4 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it, anything which I know to be false, or do not believe to be true.

Signature:

Date 07/10/24

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

I am the above named person employed as a Police Constable within Lincolnshire Police, I currently work in the Alcohol Licensing Team and predominantly cover the Lincoln and West Lindsey District areas.

On Friday 27<sup>th</sup> September 2024 I was on duty and in company with Sgt Adams and Tracy Gavins from West Lindsey District Council's licensing team. At approximately 11:00 hours we attended Today's Convenience Store, 2 Horsemarket, Caistor to carry out a routine compliance check. This was the first time that the premises had been visited by licensing officers since the licence was transferred in September 2023. At the time of the visit the premises licence holder (PLH) was Grantham Curry Pot Ltd company number 14192497 with the sole director being Arumugam Kalamohan. The designated premises supervisor (DPS) was also Arumugam Kalamohan.

Upon entering the store, I engaged with the staff member who was behind the counter. It was quickly established that there were no other staff present. The male behind the counter was wearing a black polo shirt bearing the "Today's" logo on the top left side and had the words "Challenge 25" on the right side. I asked if the gentleman had any identification to which he said he did not, he did not appear to have any belongings or possessions other than a mobile phone. I had concerns about this gentleman

Page 1 of 2

Signature:

Signature witnessed by:

Page 29

URN				
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Statement of: \_\_\_\_\_

and suspected that he may not have had the right to work because he was unable to provide ID or confirm his home address. In order to ascertain the males ID I placed him on the fingerprint scanner and was able to confirm his details as [REDACTED] born Sri Lanka. I then made a call to the Home Office National Command and Control Unit (NCCU) who were able to provide further details in relation to Mr [REDACTED] Mr [REDACTED] initially had an asylum claim but this was rejected, he had not been in contact with immigration services since November 2023. Based on this information I was advised that Mr [REDACTED] needed to be arrested under s.17 Immigration Act 1971. Subsequently the male was arrested and transported to Lincoln Custody.

Whilst I had been making enquiries with NCCU the shop remained open and several customers came in to purchase goods, being served by Mr [REDACTED] every time. He seemed proficient at using the till and knew his way around the premises and its stock well.

During the visit we checked compliance with the premises licence and found some minor breaches. The CCTV did not retain for the required period only recording back for 23 days instead of 28. There was a comprehensive folder containing various training documents and authorities but unfortunately, much of the paperwork was unsigned suggesting that staff had not received the training. I could not see any evidence that Mr [REDACTED] had received any training, yet he was in sole charge of the premises on the day and had the keys to the shop.

I spoke to Mr Kalamohan on the telephone to ask about what he would like us to do to secure the shop. He asked us to lock the door and put the keys through the letterbox but there was no letterbox. I made another call to Mr Kalamohan who said that he was sending another staff member to take over. A short while later another gentleman arrived and provided ID – [REDACTED]). The keys were given to him after checking again with Mr Kalamohan on the telephone.

Page 2 of 2

Signature:	[REDACTED] [REDACTED]	Signature witnessed by:	
------------	--------------------------	-------------------------	--

Today's Extra

I/c Tracy Gavins, Ps Adams

Cctv could not be operated by staff member.

## Photograph(s)

Sale of Alcohol When the DPS is Absent

Premises name and address: Today's Extra  
26 Horse Market Carston Ln L7-6UP

Premises Licence Number: LENTL 0515

Under the Licensing Act 2003 a Premises Licence has been granted to Premises Licence Holder. The Premises Licence includes the permission to make retail sales of alcohol for consumption.

A copy of the premises Licence is attached to this document, and you should read and understand it. In particular, please familiarise yourself with the various hours during which licensable activities are permitted to take place, the area(s) in which they may take place, and conditions which are attached to the Premises Licence that must at all times.

As the Premises Licence authorises the retail sale of alcohol as a licensable activity, it is a requirement that an individual, referred to as the Designated Premises Supervisor (DPS) is specified. The DPS for the premises is (name) Arumyjam Kalamohan.

As you do not hold a Personal Licence under the Licensing Act 2003, it is a requirement that any sale of alcohol which you do make, has been correctly authorised by either the DPS or another individual who holds a Personal Licence. You are therefore being duty authorised by DPS (name) Arumyjam Kalamohan or Personal Licence Holder (name) \_\_\_\_\_ to make sales of alcohol on their behalf, provided you ensure that the following requirements are met:

- Alcohol can only be sold on the following standard days and timings as in the attached Premises Licence.
- Adhered to any conditions on the Licence.
- You must not sell alcohol to anyone under the age of 18.
- Anyone attempting to purchase alcohol who appears to be under the age of 25, must be asked to provide suitable identification, this includes: PASS proof of age card, Photo driving Licences and passport.
- If such identification cannot be provided, or you have any doubts or concerns in any way, you should not proceed with making the sale.

DPS/ Personal Licence Holder name, signature and date: 27/9/24

➤ CONFIRM THAT I HAVE READ AND UNDERSTAND THE ABOVE:

Staff Name	Signature	Date
<u>Tricia San Demetris</u>	<u>[Signature]</u>	<u>25/07/24</u>
<u>Sharon Moran</u>	<u>[Signature]</u>	<u>25/07/24</u>
<u>Suntharam Moorthy</u>	<u>[Signature]</u>	<u>25/07/24</u>

Please record all refusals on the register below

Refusals Register

No.	Date	Product	Time	Name of person or description	Observations	Staff member
01	Example 01/01/18	Cigarettes	7:10 PM	Male, 1st years Blonde, 5ft 11"	Nervous and refusing to show ID	Alice Smith
02						
03						
04						
05						
06						
07						
08						

Manager's signature:

Date:

Additional pages can be downloaded from [noidnosale.com](http://noidnosale.com)

NO ID NO SALE!

Sample Record Book – How to Record – Incident Record!

- Record all crimes reported to the venue.
- Record all ejections of patrons.
- Record any complaints received.
- Record any incidents of disorder.
- Record any fault in the CCTV system.
- Record any refusal of the sale of alcohol and the name of the member of staff.
- Record who refused the sale.
- Record details of any officer of a responsible authority who visits the premises, including their name, job title and the responsible authority they represent.

INCIDENT RECORD				
Date & Time of the Incident	Person(s) Involved	Description of the Incident	Action Taken (Please include number if applicable)	Name of the Employee recording the incident
e.g. 25/05/2023 8pm	Drunken Male	Throw and Broke the Bottles Outside	Made a Record	A Robert
e.g. 31/05/2023 9am	Group of Young People	Wasting Nuisance, Gathering Near Alcohol Area	Asked to Leave the Premises	M Kim
e.g. 12/12/2023 2pm	CCTV Broken Down/fault	System Overloaded – Not Recording	Told the manager/CCTV Technician about it	B James
e.g. 26/12/2023 7pm	Customer Lady Look Age 50	Complained that her Daughter Bought Alcohol/Energy Drink	Report Taken, informed Manager, Asked the customer to come again when the manager is there.	J Will

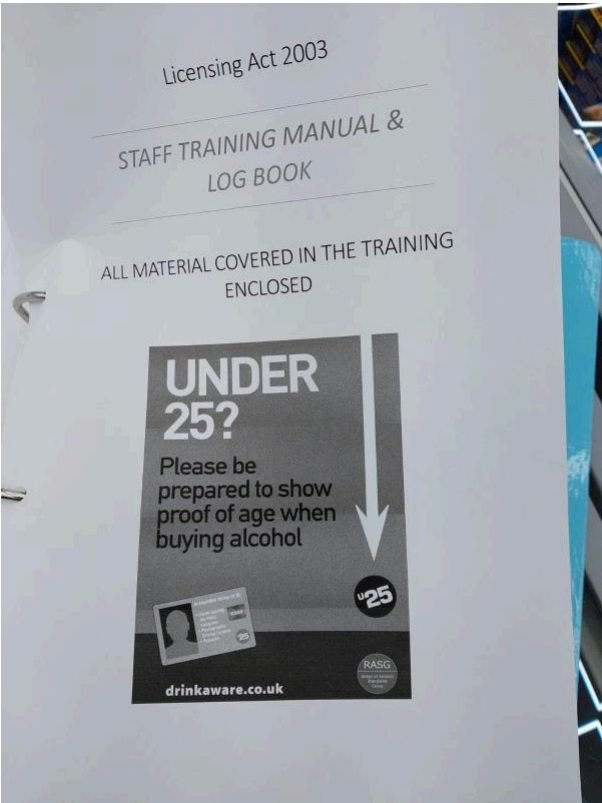
**Author: 3201299, Creation time: 27-09-2024 11:16:36**

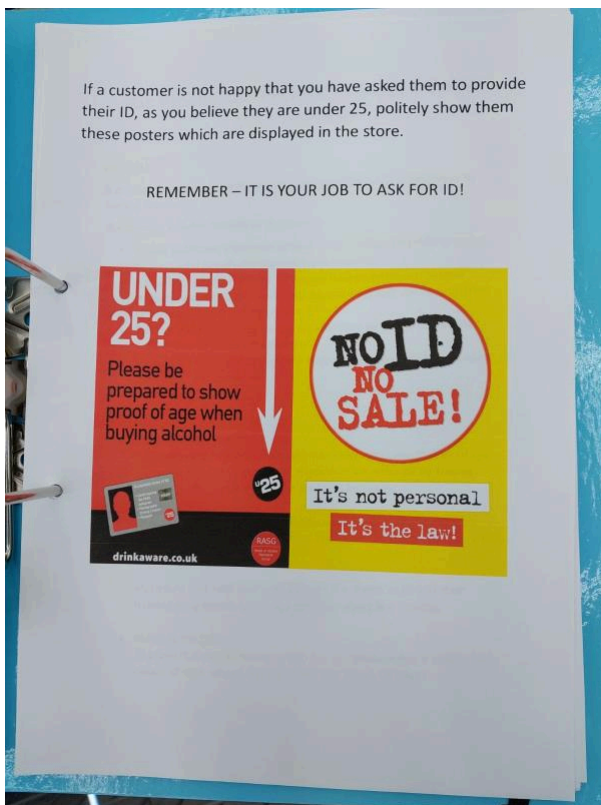
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Exhibit Ref  
Description Of Item

Docs  
Docs







## AGE RESTRICTED PRODUCTS SALES – WHAT WILL HAPPEN?

### CRITERIA

A strategy for reducing the number of underage sales is being developed by Trading Standards.

The strategy includes the following elements:

- Widely publicised telephone hotlines to encourage the public to report retailers who illegally sell age restricted products.
- A positive campaign, of which this pack is an essential part to raise retailers' awareness of the law and suggest ways staff can be supported in dealing with difficult customers.
- Test purchase at premises which are identified by calls to the hotline.
- Prosecution of persistent offenders.
- Support for a proof of age scheme which would assist retailers to meet their legal obligations.

### CONTENTS

#### • INFORMATION SHEETS

Each information sheet briefly sets out the law as it affects sales of age restricted products. In the main, these laws are enforced by Trading Standards Officers who work for the Local Authority.

To ensure that you have taken all precautions necessary to avoid an illegal sale the sheet should be read and signed by all staff to ensure they are aware of the law.

Make sure that new staff read and sign the sheets as part of their training programme. Use is as a reminder every few months.

#### • REFUSAL RECORD

To prove that you do refuse to sell, this notebook makes it easy to keep details of each refusal. KEEP IT NEAR THE POINT OF SALE!

TRADING STANDARDS


SOLVENT & BUTANE GAS LIGHTER REFILLS

To be read and signed by all staffs – CHALLENGE 25

- It is illegal to sell substances to persons under 18 if you know or think that the substance or its fumes are likely to be inhaled for the purpose of "getting high".
- It is also an offence to sell substances you think will be sniffed, to persons acting on behalf of someone who is under 18.
- It is an offence to sell butane gas lighter refills to anyone under 18.
- If you are not sure refuse the sale.
- If you suspect an older person is buying on behalf of someone under 18, to inhale – refuse the sale.

The law does not give list of possible substances which may be inhaled- it is up to you to decide whether a particular young person is going to abuse the product. The main products that are misused to "get high" are:

- Butane gas
- Certain types of glues
- Correction fluids
- Many types of aerosol sprays




Remember you commit an offence:

- If you break the law and sell butane gas lighter refills to anyone under 18.
- If you sell "sniffable" substances to anyone under 18, or someone acting on their behalf - If you know or think they will be used for "getting high".

DATE	STAFF NAME	SIGNATURE

TRADING STANDARDS

CIGARETTES & TOBACCO PRODUCTS



To be read and signed by all staffs – CHALLENGE 25

- It is illegal to sell cigarettes or any other tobacco products to anyone under 18.
- If you are not sure that the customer is over the age of 18, ask for proof of age.
- If you are still not sure – REFUSE THE SALE
- Remember that the law forbids all tobacco sales to children. If a child says, "they are for my mum", that makes no difference, even if it's true.
- Make sure the warning on the packets is in English.
- Make sure the warning notice "It is illegal to sell tobacco products to anyone under the age of 18" can be seen clearly at all times.
- Cigarettes vending machines must have on them the warning "This vending machine is only for use of people aged 18 or over".
- Users of vending machines should be monitored to ensure no under 18s are buying cigarettes.

Remember you commit an offence.

- If you break the law and sell tobacco products to a child under 18.
- If you sell unpacked cigarettes.
- If you do not display the warning notice or the vending machine sign so that they can be easily seen.

DATE	STAFF NAME	SIGNATURE

TRADING STANDARDS

ALCOHOL

No Proof of Age  
No Alcohol

18

To be read and signed by all staffs – CHALLENGE 25

- It is illegal to sell ALCOHOL to anyone under 18.
- It is illegal to sell liqueur chocolates to anyone under the age of 16.
- Staff under the age of 18 must not sell alcohol without the knowledge of the sale by the license responsible person over 18.
- If you are not sure the customer is 18 (alcohol) or 16 (liqueur chocolates), ask for proof of age.
- If you are still not sure, REFUSE THE SALE!
- All premises which sell alcohol, must have a licence.
- The licence must affix to the licensed premises a notice in a conspicuous place stating, their name and the word "Licensed" followed by what the premises are licensed for.
- It is illegal for anyone under 18 to attempt to purchase alcohol.
- If you sell alcohol to a person under 18 your alcohol licence may be at risk.


Remember you commit an offence,

- If your premises doesn't have a licence to sell alcohol and you sell alcohol.
- If you break the law and sell alcohol to a person under 18 or liqueur chocolates to a child under 16.
- If a member of your staff who is under 18, sell alcohol without your knowledge or the knowledge of the responsible person who is over 18.

DATE	STAFF NAME	SIGNATURE

TRADING STANDARDS

FIREWORKS



To be read and signed by all staffs – CHALLENGE 25

- It is illegal to sell FIREWORKS to anyone under 18.
- If you are not sure that the customer is over the age of 18, ask for proof of age.
- If you are still not sure, REFUSE THE SALE!
- It is an offence to sell caps, party poppers, throwdowns, novelty matches etc, to anyone under 16.
- You must be registered with Trading Standards to keep fireworks in your shop.
- All fireworks must be stored and displayed for sale in a safe and secure manner.

Remember you commit an offence,

- If you sell fireworks to anyone under 18.
- If you sell caps, party poppers, throwdowns, novelty matches etc, to anyone under 16.

DATE	STAFF NAME	SIGNATURE

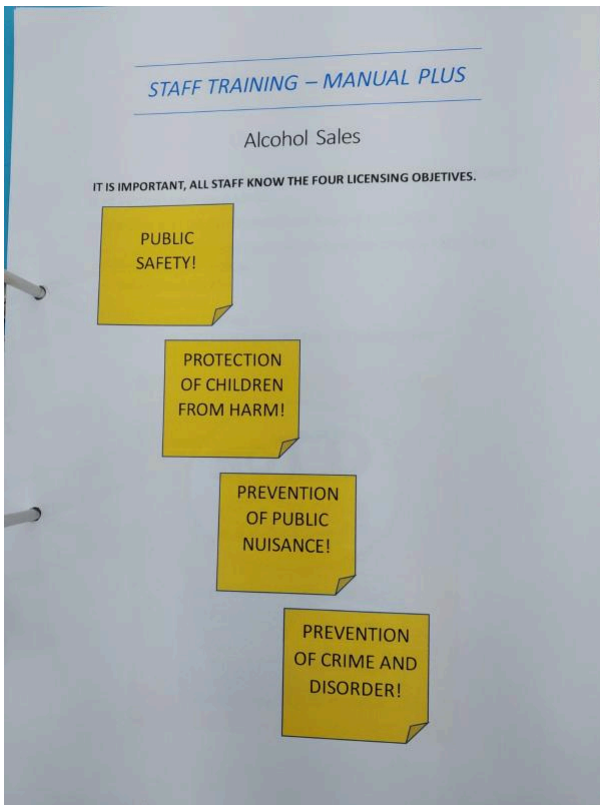


Exhibit Ref  
Description Of Item

Staff training  
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Exhibit Ref  
Description Of Item

Challenge 25/summary  
Posters

Incident details

Incident date  
Incident log number  
Incident number  
Entered by

1299, PC Rebeka Casey

Phone number for Mr Arumugam Kalamohan

[illegible]





Please record all refusals on the register below

NO.	Date	Product	Time	Name of person or description	Observations	Staff member
01	Example 02/12/2013	Cigarettes	7:10 PM	Male 18 years Blonde, 5ft 11"	Nervous and refusing to show ID	Allen Smith
02	25/12/2023	Vape	20:28	Male Black, 5ft 11"	Refusing to show ID	D
03	23/12/2023	Vape	14:50	Girl Black, 5ft 11"	Refusing to show ID	D
04	24/12/2023	Beer, cigarette	13:48	Boy, white	Refusing to show ID	D
05	23/12/23	Vape	15:15	Boy, 180gms	Refusing to show ID	D
06	31/12/23	Vape	14:58	Boy, 180gms	Refusing to show ID	D
07	01/01/24	Vape	14:43	Boy, 180gms	Refusing to show ID	D
08	03/01/24	Vape	14:43	Boy, 180gms	Refusing to show ID	D

Manager's Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Additional pages can be downloaded from [noidnosale.com](http://noidnosale.com)

**NOID**  
**NO SALE!**

Additional pages can be downloaded from [noitrosale.com](http://noitrosale.com)

No.	Date	Product	Time	Name of person or description	Observations	Self remarks
20	20/09/24	Vape	14:43	Girls, 8 kids	Look like 80	
10	20/09/24	Vape	16:35	Male dressed Girl, white Student, wearing No. 39	Look like a 20, wearing No. 39	
31	20/09/24	Vape	8:05 AM	White boy	At 10 Keating	
12	20/09/24	Spirit	10:16 PM	White boy	At 10 Keating	
13	20/09/24	Booze	7: PM	White boy	At 10 Keating	
24	20/09/24	Cigarette	10: PM	White boy	At 10 Keating	
18	20/09/24	Cigarette	11:30 AM	Girl	At 10 Keating	
16	20/09/24	Booze	6:11 AM	Boy white	At 10 Keating	

Manager's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

NO ID FOR SALE

Please record all refusals on the register below

No.	Date	Product	Time	Name of person or description	Observations	Staff member
17	03/04/24	Uape	14:59	girl, Sandalwood dress, 18/30 rejected	look underneath	
18						
19						
20						
21						
22						
23						
24						

Manager's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Additional pages can be downloaded from [noidosale.com](http://noidosale.com)

**noID**  
SALUS!

Exhibit Ref  
Description Of Item

Refusals log  
Refusals log

Incident details

Incident date  
Incident log number  
Incident number  
Entered by

1299, PC Rebeka Casey

Today's, Caistor

Photograph(s)

Authority to sell alcohol

I, ARUMUQAM KALAMONAN being a Personal Licence holder, hereby certify that RASITH SUBRAMANIAM has received training in licensing law, company policy and their responsibilities when selling alcohol.

I therefore authorise RASITH SUBRAMANIAM to sell alcohol by retail for consumption off the premises at TODAY'S EXTRA 2 HORSE MARKET CAISLE LN 7 6HP

Signed [Redacted Signature]  
Print Name ARUMU QAM KALAMONAN  
Dated 05/10/24

I, RASITH SUBRAMANIAM am aware of my responsibilities with regard to licensing law. I understand that I am authorised to sell alcohol.

Signed [Redacted Signature]  
Print Name RASITH SUBRAMANIAM  
Dated 05/10/24

**25-POLICY**

To be read & signed by all staff.

At Bargain Booze, we operate a strict "25-Policy" and have signs and notices on display in the store to advertise this policy.

What this "25-Policy" means is simply:

1. If you suspect a customer buying alcohol appears to be under the age of 25, then you must ask for proof of age.
2. If they cannot provide any form of acceptable photo ID, then politely refuse service.
3. If they CAN provide an acceptable form of photo ID that shows them to be age 18 or over, then you can serve them.

If the customer you suspect to be under 25 has no form of acceptable ID, but protests that they are 20 or 21, for instance, then you **CANNOT** give them the benefit of doubt and serve. Once you have the seed of doubt in your mind that they may be under 25 and they cannot prove otherwise, then the sale **MUST** be refused. Do not risk a criminal conviction and a fine of up to £5000 - **REFUSE THE SALE**. You may also be issued with an **£80 fixed penalty notice (on the spot fine)** for disorder by Police if an **underage sale is made**.

**\*\* Please note - remember: if the customers ID shows them to be 18 or over, then you can serve them. The 25-Policy DOES NOT mean (not) we only serve customers aged 25 or over - it means that we ask for ID if we suspect them of being under 25.**

The following acts and omissions are regarded as **gross misconduct** and could lead to your instant dismissal without notice:

1. Selling intoxicating liquor, cigarettes, lottery or any other age restricted product to persons who are underage.
2. Not complying with the Under 25 Policy.

If you need glasses or corrective lenses to read, it's a requirement that you wear them every time you check a person's ID, to ensure that you are complying with the Challenge 25 Policy.


Would you please acknowledge that you have understood these instructions by signing and dating below.

Name of Employee (Print) Rajith Subramaniam

Signature of Employee [Redacted]

Date 05/10/2024

Exhibit Ref  
Description Of Item



Head Office Address:  
1 Dock Way,  
North-West Industrial Estate,  
Ruralist, County Durham, SR8 2HY

Registered Office:  
Unit 13, The Old Mill, The Town, North-East, Durham,  
North-East, County Durham, SR8 2HY  
0191 586 1111  
sales@eden-farm.co.uk  
www.eden-farm.co.uk

QR Code

SCAN OR TO REGISTER  
FOR ONLINE ORDERING

Invoice To:  
O B Ramsden & Co Ltd  
Adam Smith Street  
Grimsby  
North East Linch  
DN31 1SL  
01472 313200

Deliver To:  
AK Lincoln Ltd 472407  
TIA Todays  
2 Horseshoe  
Canter  
Market Rasen  
LN7 6LP

DELIVERY NOTE  
650742

TAX POINT DATE  
07/11/24  
Order No: 783545

Account	Del Date	REFERENCE	Weight	No. of Lines	No. of Cases	Operator	Route	Page
LN572	07/11/24	000228955-1	127.250	28	30	912	357/7	1 of 1
Code	Description	Qty	Unit	Price	Value	VAT		
5427	6 Kershaw's Sausage & Chops £2.75	1	6 x 400g	13.00	13.00	1		
5411	6 Kershaw's Beef Lasagne £2.38	1	6 x 480g	11.22	11.22	1		
5431	6 Kershaw's Steaklet & Chips £2.75	1	6 x 380g	13.00	13.00	1		
5433	6 Kershaw's All Day Breakfast £2.75	1	6 x 400g	13.00	13.00	1		
5439	6 Kershaw's Turkey Dinner £2.75	1	6 x 400g	13.00	13.00	1		
5437	6 Kershaw's Lamb Dinner £2.75	1	6 x 400g	13.00	13.00	1		
7819	Aunt Bessie's 12pk Golden Yorkshire Puddings £1.99	1	12 x 220g	17.88	17.88	1		
3172	Aunt Bessie's 4pk Yorkshire Puddings £1.25	1	10 x 140g	10.53	10.53	1		
2638	Aunt Bessie's Family Apple Pie	1	7 x 550g	18.75	18.75	1		
2224	Aunt Bessie's 4pk Golden Yorkshire Puddings	1	8 x 720g	18.14	18.14	1		
2434	Bannister's 4pk Golden Yorkshire Puddings	1	6 x 260g	9.50	9.50	1		
3045	Birds Eye 4pk Golden Yorkshire Puddings	1	6 x 260g	14.86	14.86	1		
2463	Birds Eye 4pk Golden Yorkshire Puddings	1	6 x 260g	22.57	22.57	1		
3283	Birds Eye 4pk Golden Yorkshire Puddings	1	6 x 260g	19.82	19.82	1		
3051	Birds Eye 4 Chicken Burgers £2.79	1	12 x 200g	27.77	27.77	1		
3056	Birds Eye 4 Cod Fish Fingers £2.99	1	12 x 224g	29.76	29.76	1		
3766	Bisto Macaroni Cheese £2.49	1	6 x 375g	12.44	12.44	1		
2559	Chicago Town 2 Deep Dish Mega Meaty £2.50	1	12 x 314g	22.50	22.50	1		
2986	Chicago Town Thin & Crispy Meat Feast £2.75	1	6 x 325g	13.66	13.66	1		
8723	Dina Southern Fried Chicken Strips £1.19	1	12 x 190g	11.86	11.86	1		
3756	Farmer Jack's 10 Garlic Slices £1.49	1	12 x 260g	12.52	12.52	1		
1518	Ice Club Classic Ice Cubes	3	5 x 1.8kg	6.37	19.11	1		
3061	Linda McCartney's 6 Vegetarian Sausages	1	6 x 270g	12.96	12.96	1		
5508	San Marco Thin Cheese & Tomato £1.39	1	10 x 253g	11.58	11.58	1		
9647	Yankee 4 Lamb Grills £3.29	1	8 x 340g	21.41	21.41	1		
9642	Yankee Doner Kabob Strips £2.49	1	6 x 500g	11.92	11.92	1		
3793	Yong's 10 Cod Fish Fingers £3.00	1	12 x 250g	28.16	28.16	1		
3190	Zulekha Original Family Paratha	1	6 x 140g	26.66	26.66	1		

Delivery Instructions:

VAT Analysis  
Rate Value VAT  
0.00 % 470.59 0.00  
470.59 Total Ex VAT  
470.59 Total Amount

PAYMENT TERMS: 30 DAYS

PAYMENT DUE ON: 07/12/24

UNUSED  
IRRELEVANT TO REVIEW

printed 19/11/2024 at 8:11

Page 51

Page 3 of 6

OFFICIAL

Deliver To  
AK LINCOLN LTD  
TIA TODAYS  
2 HORSEMARKET  
CASTOR  
MARKET RASEN  
LN7 6LP

Invoice To  
AK LINCOLN LTD  
TIA TODAYS  
2 HORSEMARKET  
CASTOR  
MARKET RASEN  
LN7 6LP

SALES INVOICE

DeeBee  
ADAM SMITH STREET  
GRIMSBY  
Tel: 01472 313200  
www.deebee.co.uk  
VAT REG NO: GB127 7282 59  
AWRS URN: XGAW00000102226

Account No.	Tax Date	Order No.	
472407	06/11/24	504078	
Invoice No.	Delivery Date	Reference	Due Date
390501	07/11/24	0000168 STD	21/11/24

Page No: 1

CODE	DESCRIPTION	SIZE	PACK	ORD QTY	DEL QTY	UNIT PRICE	GOODS TOTAL	% VAT	RRP	POR%
843240	AMBROSIA CUSTARD pint 95	400gm	12	1	✓	17.99	17.99	0.00	1.95	23.1
827208	AMBROSIA RTE PORRIDGE RASPBERRY	210gm	6	2	✓	6.99	13.98	0.00	1.69	31.0
756713	AMBROSIA STRAWBERRY CUSTARD	400gm	12	1	✓	19.69	19.69	0.00	2.19	25.0
840903	BETO GRAVY GRANULES BEEF pint 99	180gm	12	1	✓	25.85	25.85	0.00	2.99	27.8
837558	CADNARY MILK FINGERS pint 49	110gm	12	1	✓	12.19	12.19	20.00	1.49	18.1
795470	DISC'D OF BOLOGNESE PASTA SAUCE	400gm	6	1	✓	7.29	7.29	0.00	1.49	18.4
869860	LOCAL BROWN EGG	1kg	6	1	✓	11.49	11.49	0.00	2.79	31.3
830715	MIV CA	200gm	15	1	✓	15.49 P	15.49	20.00	1.85	33.0
845120	ALWAY	4	1	✓	✓	12.65	12.65	0.00	2.69	19.2
854710	BODYFORM ULTRA COSMOGIC pint 49	49	10	1	✓	12.65	12.65	0.00	1.49	15.1
758449	CLEARBLUE VISUAL RAPID PREGNANCY TEST	1x	6	1	✓	22.25	22.25	20.00	5.79	23.1
834540	RENNES PEPPERMINT	24x	12	1	✓	24.79	24.79	20.00	3.19	22.2
694305	MARGOLD KITCHEN GLOVES MEDIUM	ap	6	1	✓	10.79	10.79	20.00	3.29	34.4
671871	MARGOLD KITCHEN GLOVES LARGE	ap	6	1	✓	11.89	11.89	20.00	3.40	31.8
871811	FELIX POUCH CHICKEN 3 for 1.35	80gm	24	1	✓	7.99	7.99	20.00	0.59	32.2
845005	GO CAT CHICKEN & DUCK pint 99	700gm	5	1	✓	8.49 P	8.49	20.00	2.99	31.8
854994	THOMAS CAT LITTER	5kg	4	1	✓	10.59	10.59	20.00	3.79	16.1
639870	WHISKAS COMPLETE DRY TUNA 1+	300gm	6	1	✓	7.99 P	7.99	20.00	2.40	35.8
827611	WHISKAS MILK	200ml	6	1	✓	5.49	5.49	20.00	1.59	20.9
845703	BARRATT SOFTIES REFRESHER pint 15	120gm	12	1	✓	8.49	8.49	20.00	1.15	26.1
841297	DISC'NESTLE MILKYBAR pint 25	80gm	14	1	✓	11.55	11.55	20.00	1.25	20.1
865102	GALAXY MILK pint 35	100gm	24	1	✓	21.45	21.45	20.00	1.35	20.5
869590	HARBO FOOTBALL MIX pint 25	180gm	12	1	✓	9.09	9.09	20.00	1.25	27.2
865539	M&BASSETTS SOUR PATCH KIDS pint 90	130gm	10	1	✓	9.75	9.75	20.00	1.50	22.0
867766	NESTLE MILKYBAR GIANT BUTTONG BAG pint 35	85gm	12	1	✓	10.45	10.45	20.00	1.35	22.5
849129	PORPETS MILK CHOCOLATE TOFFEE BAG pint 15	95gm	10	1	✓	7.49	7.49	20.00	1.15	21.8
875583	ROWNTREE RANDOMS FUZZY CACTUS	130gm	10	1	✓	10.99	10.99	20.00	1.65	20.0
724110	WIGGLYS EXTRA SUGAR FREE MINTS BOTTLE	70pce	6	1	✓	8.49	8.49	20.00	2.29	25.8

Porder No: 96 Op No: 912 Rep: 16  
TITLE TO THE GOODS WILL REMAIN THE PROPERTY OF D.B. RAMSDEN & CO LTD UNTIL PAID FOR IN FULL  
D.B. RAMSDEN & CO LTD WILL CHARGE AN ADMINISTRATION FEE OF £100.00 PLUS VAT FOR ANY UNPAID DIRECT DEBIT OR CHEQUE IRRESPECTIVE OF THE REASON

UNUSED  
IRRELEVANT TO REVIEW



Exhibit Ref  
Description Of Item

Invoices

Sale of Alcohol When the DPS is Absent

Premises name and address: Today's Extra  
26 Horse Market Causton LN7-6UR

Premises Licence Number: LDH11 0515

Under the Licensing Act 2003 a Premises Licence has been granted to Premises Licence Holder. The Premises Licence includes the permission to make retail sales of alcohol for consumption.

A copy of the premises licence is attached to this document, and you should read and understand it. In particular, please familiarise yourself with the various hours during which licensable activities are permitted to take place, the area(s) in which they may take place, and conditions which are attached to the Premises Licence that must at all times.

As the Premises Licence authorises the retail sale of alcohol as a licensable activity, it is a requirement that an individual, referred to as the Designated Premises Supervisor (DPS) is specified. The DPS for the premises is (name) Arunygam Kalanathan

As you do not hold a Personal Licence under the Licensing Act 2003, it is a requirement that any sale of alcohol which you do make, has been correctly authorised by either the DPS or another individual who holds a Personal Licence. You are therefore being duty authorised by DPS (name) Arunygam Kalanathan or Personal Licence Holder (name) \_\_\_\_\_ to make sales of alcohol on their behalf, provided you ensure that the following requirements are met:

- Alcohol can only be sold on the following standard days and timings as in the attached Premises Licence.
- Adhered to any conditions on the licence.
- You must not sell alcohol to anyone under the age of 18.
- Anyone attempting to purchase alcohol who appears to be under the age of 25, must be asked to provide suitable identification, this includes 'PASS proof of age card, Photo drinking licences and passport'.
- If such identification cannot be provided, or you have any doubts or concerns in any way, you should not proceed with making the sale.

DPS/ Personal Licence Holder name, signature and date: [Signature] 25/07/24

➤ CONFIRM THAT I HAVE READ AND UNDERSTAND THE ABOVE:

Staff Name	Signature	Date
<u>Philoe San David</u>	<u>[Signature]</u>	<u>25/07/24</u>
<u>Sharon Mahon</u>	<u>[Signature]</u>	<u>25/07/24</u>
<u>Sundharan Moorthy</u>	<u>[Signature]</u>	<u>25/07/24</u>

**Sale of Alcohol When the DPS is Absent**

Premises name and address \_\_\_\_\_

Premises Licence Number \_\_\_\_\_

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- Alcohol can only be sold on the following standard days and timings as in the attached Premises Licence.
- Adhered to any conditions on the licence.
- You must not sell alcohol to anyone under the age of 18.
- Anyone attempting to purchase alcohol who appears to be under the age of 25, must be asked to provide suitable identification, this includes 'PASS' proof of age card, Photo driving licences and passport.
- If such identification cannot be provided, or you have any doubts or concerns in any way, you should not proceed with making the sale.

DPS/ Personal Licence Holder name, signature and date \_\_\_\_\_

➤ CONFIRM THAT I HAVE READ AND UNDERSTAND THE ABOVE:

Staff Name	Signature	Date

Exhibit Ref

Description Of Item

**Incident details**

Incident date

Incident log number

Incident number

Entered by

1299, PC Rebeka Casey

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

URN

Statement of: **Rebeka Casey**Age if under 18:  
018

(if over 18 insert 'over 18')

Occupation: Police Constable 1299

This statement (consisting of page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it, anything which I know to be false, or do not believe to be true.

Signature:

Date 15/07/25


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

I am the above named person employed as a Police Constable within Lincolnshire Police Alcohol Licensing Team.

On Tuesday 17<sup>th</sup> June 2025 I was on duty and in company with Community Beat Manager PC 1066 Turner. At approximately 11:00 hours we attended Today's shop, 2 Horsemarket, Caistor to carry out a compliance check. I have visited this premises twice in 2024 on both occasions non-compliance with the premises licence was highlighted and on one occasion an illegal worker was found working within.

Upon arrival at the premises I saw two males chatting at the rear part of the shop. I recognised one of the males and believed that we had met before, initially I suspected that he was the DPS that I had encountered on a previous visit. This male avoided contact and straight away walked past me towards the front of the shop. I had thought that he was just going to the till but very quickly realised that he was making his escape via the front door onto the street. PC Turner was outside and we both followed the male shouting him to stop but he refused. The male was temporarily lost but was soon located hiding behind a parked vehicle on a nearby driveway. The male was detained and taken to our unmarked Police vehicle so that we could ascertain why he had run from Police.

Page 1 of 3

Signature:		Signature witnessed by:	
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Page 55

URN				
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Statement of: \_\_\_\_\_

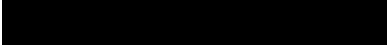

The male did not have a very good understanding of English and so a Tamil interpreter was used to facilitate communication via a telephone interpreting service. Male provided his name and D.O.B and I then recalled that this was not the DPS but the illegal worker encountered and detained in September 2024.

I asked various questions of the male and recorded the answers on paper. The male admitted that he had been back at the premises for around 2 weeks and that he worked 2/3 days each week sometimes as little as 8 hours per week. Whilst on the premises the male would clean the shop and help with deliveries. He said that he was paid cash by whoever was in the shop at the time and that the rate of pay was £6 per hour.

I carried out some checks with Home Office Immigration who explained that the male was not currently liable for detention. Advice was given to the male about how he could return to his home country of Sri Lanka should he wish to do so. At that time the male did not wish to return so was allowed to leave.

I then went back to the shop to speak with other staff to check compliance and ascertain if CCTV could be accessed – this shop assistant could not access the CCTV. The worker did hand me a folder containing licensing and training documentation. Of note there was a blank incident book although the refusals register did have multiple entries. I had a brief telephone conversation with Mr Kalamohan (Licence holder) and explained the concern with the male who had run from the premises. Mr Kalamohan stated that he had 3 staff employed at the shop and all had the right to work.

After the visit I emailed Mr Kalamohan and the DPS requesting copies of CCTV be provided between 10:00 and 11:15 on 17<sup>th</sup> June across all cameras angles. On 26<sup>th</sup> June I received confirmation from Mr

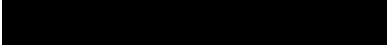

Signature:	 	Signature witnessed by:	
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URN				
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Statement of: \_\_\_\_\_

Kalamohan that the footage was ready and available for collection. On reviewing the CCTV I noted that there were only 8 cameras included and one of those 8 did not appear to be working. Subsequently I checked this with Mr Kalamohan who informed me that camera 8 was not working but that this only covered the outside of the premises I asked if there were cameras at the rear of the shop and he said that there were not and there were only cameras in the stock room. Having previously looked at CCTV I believed that there were more than 8 cameras and interestingly the area where the illegal worker had been seen had not been captured from the footage provided.

On 10<sup>th</sup> July 2025 I went back to the Today's shop and met with another different shop assistant. Mr Kalamohan arranged for this member of staff to meet me there as he was unavailable in London. Upon reviewing the CCTV with staff it was evident that there were in fact 16 cameras covering all public areas of the shop as well as the staff rooms, the camera footage only retained from 4<sup>th</sup> July onwards meaning footage from 17<sup>th</sup> June was missing. There is a condition on the premises licence which states that footage must be retained for a minimum of 28 days meaning that the premises were in breach of this condition.

Signature:	 	Signature witnessed by:	
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**IMMIGRATION – EMPLOYEE QUESTIONS**Interviewing Officer: PC 1299 CASEYInterviewee: [REDACTED]D.O.B: [REDACTED] Place of birth: SRI LANKA (JAFFNA)Home address: [REDACTED]TELEPHONE: [REDACTED]

Person speaking	
1299	How long have you been working here?
M.J	2 WEEKS
1299	What is your job role/ what are your duties?
M.J	CLEANING THE SHOP SOMETIMES I WILL UNLOAD DELIVERIES AND PUT THEM IN STORE ROOM.
1299	What days/hours do you work each week or day?
M.J	2 OR 3 DAYS EACH WEEK 5-8 HOURS A DAY. SOMETIMES ONLY 8 HRS PER WEEK.
1299	Do you work the same hours/days every week?
M.J	NO SPECIFIC DAYS
1299	Who gave you this job?
M.J	FRIEND RECOMMENDED HIM FOR JOB <sup>TO</sup> SOMEONE CALLED MOHAN (MALE).
1299	Who tells you what hours/days to work?

M.J	MY FRIEND - [REDACTED] WHO LIVES IN LONDON.
1299	HE WILL CALL ME AND INFORM ME.
M.J	IS IT ONLY THIS SHOP
M.J	YES.
1299	Who tells you what tasks/duties to do each day?
M.J	WHOEVER IS IN THE SHOP TELLS ME WHAT TO DO.
1299	Do you have a shift roster?
M.J	NO
1299	How are you paid? (Money, accommodation, food)
M.J	CASH
1299	If Money, how much and how do you receive it?
M.J	CASH SOMETIMES DAILY, SOMETIMES EVERY COUPLE OF DAYS. £6.00 PER HOUR.
1299	Who pays you?
M.J	WHOEVER IS IN THE SHOP WILL PAY. I DON'T KNOW THEIR NAMES.
1299	Do you pay income tax or have a national insurance number?
M.J	NO
1299	IS ACCOMODATION PART OF THE JOB.
M.J	NO ITS MY FRIENDS ACCOMODATION (FRIEND - [REDACTED])
1299	If accommodation is given, would you be able to stay at said premises if you did not work/help out?

M.J	YES
1299	Do you receive pay slips?
M.J	NO.
1299	What name does the employer know you as?
M.J	I DON'T KNOW IF HE KNOWS ME OR NOT. I'VE NEVER MET MOHAN, BUT I THINK HE OWNS THE SHOP
1299	Did you show documents before being offered the job? If so, what?
M.J	NO
1299	Does your employer know your Immigration status?
M.J	NO.
1299	Does your employer know you have no permission to work in the UK?
M.J	NO

\* OVER PAGE \*

Date/Time: 17/06/25 12:15

Language interview conducted in/interpreter used?

TAMIL INTERPRETER - TELEPHONE

Signed: [REDACTED] (Interviewing Officer)



Signed: X. [REDACTED] ..... (Interviewee)

1299 I MET YOU IN SEPT 2024. WHAT HAPPENED AFTER THAT?

M.J I LEFT THE PLACE AND WENT LONDON.

1299 HOW DID YOU GET TO LONDON

M.J MY FRIEND CAME TO GET ME

1299 DID YOU ASK YOUR FRIEND TO GO TO LONDON?

M.J YES I CALLED MY FRIEND LAKSHMANAN AND TOLD HIM I HAD NO JOB AND NOWHERE TO STAY.

1299 WHAT DID YOU DO IN LONDON.

M.J SOMETIMES CONSTRUCTION/LABOURING WORK.

1299 HOW DID YOU GET BACK TO CAISTOR?

M.J I CAME WITH [REDACTED]

1299 DID YOU HAVE A CHOICE.

M.J NO I HAD NO CHOICE.

1299 WHAT WOULD HAPPEN IF HE SAID NO.

M.J I COULD'VE STAYED IN LONDON. SOMETIMES I HAD ACCOMMODATION OR STAYED WITH FRIENDS.

1299 ARE YOU FRIGHTENED OF ANYTHING /ANYONE?

M.J NOT AFRAID.

1299 WHERE WOULD ~~ANY~~ YOU LIKE TO GO NOW?

M.J IF NOT HERE THEN LONDON.

1299 DOES YOU WANT TO STAY ABOVE THE SHOP?

M.J NO BUT THERE IS ANOTHER FAMILY LIVING THERE.

1299 DO YOU HAVE A PASSPORT

M.J - NO.

1299 HOW DID YOU GET TO THE UK.

M.J ON A PLANE INTENDING TO GET A JOB ON A SHIP. THE AGENT TOOK MY PASSPORT. THE AGENT BOUGHT ME TO UK AND THEN DISAPPEARED.

1299 DO YOU HAVE THE AGENTS NAME?

M.J [REDACTED]

1299 HOW DID YOU MEET THE AGENT.

M.J BEFORE ARRIVING AT HEATHROW AIRPORT I'D ONLY SPOKE TO HIM ON THE PHONE.

1299 WHAT DID HE DO AFTER THE AIRPORT?

M.J I CALLED A FRIEND WHO LIVED IN LONDON AND HE COLLECTED ME HE'S RETURNED TO HIS OWN COUNTRY NOW.

1299 ARE YOU BEING FORCED TO STAY HERE?

M.J NO NOTHING LIKE THAT.

1299 DOES HE WANT TO GO BACK TO ~~LONDON~~ THE SHOP?

M.J NO I'D LIKE TO GO BACK TO LONDON. MY FRIEND WOULD GET A TRAIN OR BUS TICKET.

1299 HOW WOULD YOU GET TO THE TRAIN STATION/BUS STATION?

M.J MY FRIEND WOULD ARRANGE.

1299 DO YOU HAVE ANY OTHER DETAILS OF THE FRIEND?

M.J [REDACTED]

1299 HOW DO YOU KNOW HIM?

M.J I KNOW HIM FROM LONDON HE WORKED IN CONSTRUCTION WITH ME.

1299 DO YOU WANT TO STAY IN THE UK

M.J YES I HAVE PROBLEMS IN MY OWN COUNTRY

1299 DO YOU WANT TO GO BACK TO SRI LANKA -

M.J NO BECAUSE I HAVE PROBLEMS THERE.

1299 I WILL PROVIDE 2 PHONE NUMBERS SO IF YOU CHANGE YOUR MIND YOU CAN CONTACT THEM FOR ASSISTANCE (TRAVEL DOC'S AND TICKETS). NO DOCS/MONEY WILL BE REQUIRED FROM HIM.

IS THERE ANYTHING ELSE WE CAN HELP?

M.J NO.

**2 Horsemarket Caistor - Today's Local**

Attended with PC 1066 Turner. Upon entry saw two males at the rear section of the shop. One appeared to be sorting stock and the other was talking to him. I introduced myself and the male sorting stock claimed to not understand he walked past and to the front of the shop and out of the front door. PC Turner was outside. The male started running so we gave e chase and located him hiding behind a vehicle on a nearby driveway. Male detained.

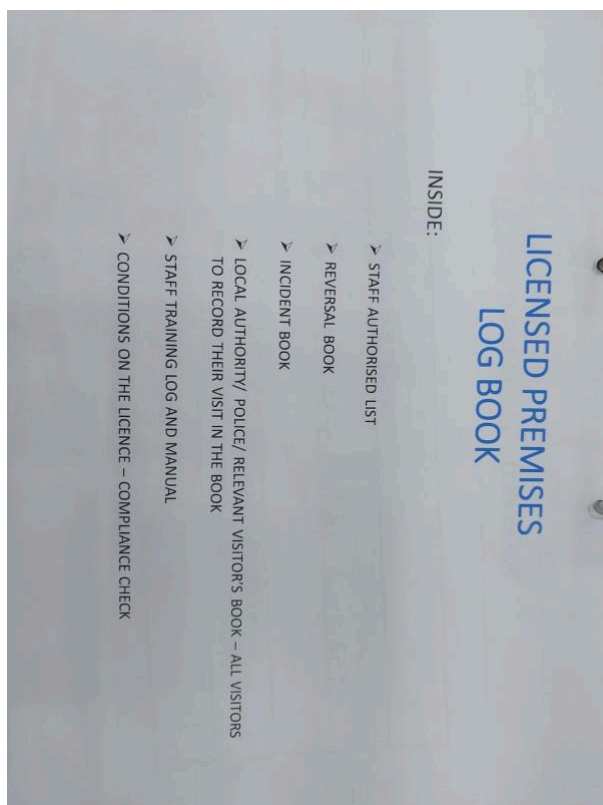
It was established that this male was [REDACTED] who had no right to work.

Illegal working interview carried out with Tamil interpreter on the telephone.

Once this male had been spoken with he was let on his way. We returned to the shop to continue the compliance check. The second male from earlier had left my the time I arrived and a different staff member was present.

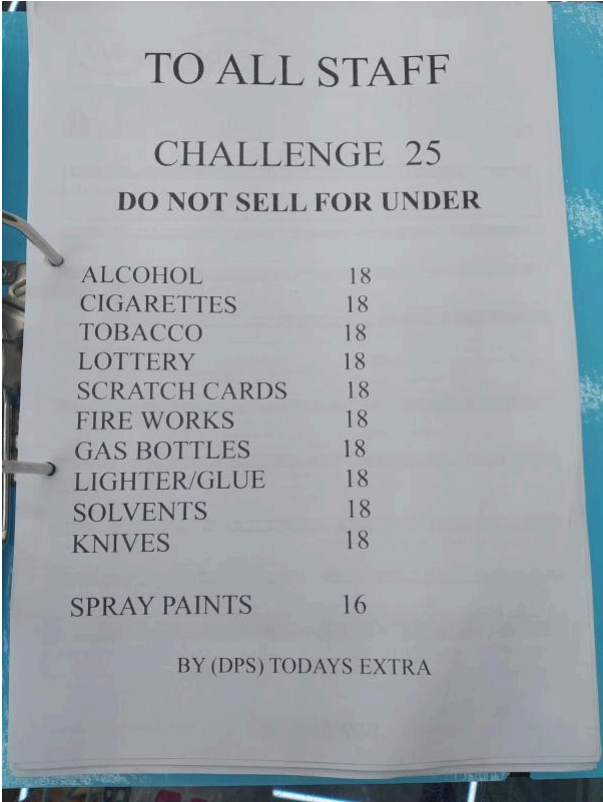
Staff not able to access Cctv.

Mr Kalamohan spoken to on the phone and request for CCTV was explained.

**Photograph(s)**

LICENSED PREMISES – LOG BOOK

NAME OF THE PREMISES:	Today's Expo
ADDRESS:	2 Horse Market Carlot LUT-6UP
PREMISES LICENCE NUMBER	L.B.H.L 0515
DPS NAME AND CONTACT PHONE NUMBER	RASHITH SUGRAMANIAN - [REDACTED] Arangan Karaman - 8
MANAGER NAME AND CONTACT PHONE NUMBER	



**Authorise to Sell**

Name of premises TODAYS EXTRA

Premises licence holder GIRANTHAN CUREE PGT LTD

DPS RATHI SURESHKANTH

I, RATHI SURESHKANTH, being the holder of a personal licence and the DPS of the above licensed premises, authorise the staff named below to make sales of alcohol under the terms of the above premises licence and in accordance with the Licensing Act 2003.

Staff have been made aware of their legal responsibilities in terms of the sale of alcohol under the Licensing Act 2003. This authorisation applies at all times including when I am not present. I can be contacted on the number below.

Signed: [Redacted] Date 20/11/24 Contact number [Redacted]

**Staff**

I can confirm that I am aware that it is an offence to:

Knowingly sell, attempt to sell or allow the sale of alcohol to persons who are drunk;

Sell alcohol to a person under the age of 18;

Sell or allow the sale of alcohol at any other times other than the hours stated on the licence and in accordance with the licence conditions;

I understand that the shop operates a Challenge 25 policy and that I must check valid appropriate photographic ID of anyone who appears under 25 to ensure that alcohol is only sold to persons over the age of 18 years old.

Name	Signed	Date (s)
<u>S. NARAYANAKUMAR</u>	<u>[Redacted]</u>	<u>20/11/2024</u>
<u>A. KALAMATHAN</u>	<u>[Redacted]</u>	<u>23/11/2024</u>
<u>Sonik Anthony</u>	<u>[Redacted]</u>	<u>21/12/2024</u>
<u>K.B. PRADIP JEE</u>	<u>[Redacted]</u>	<u>15/12/2025</u>
<u>U.S.E. CHIDAKA</u>	<u>[Redacted]</u>	<u>16/06/2025</u>
<u>D.M. Ramesh Kumar</u>	<u>[Redacted]</u>	<u>16/06/2025</u>

This form to be kept on the premises and made available for inspection by the responsible authorities.

## Sale of Alcohol When the DPS is Absent

Premises name and address TODAYS EXTRA  
2 HORSE MARKET, CAISTOR, LINCOLN, LN7 6UP  
Premises Licence Number 32-UNB50-224

Under the Licensing Act 2003 a Premises Licence has been granted to Premises Licence Holder. The Premises Licence includes the permission to make retail sales of alcohol safe for consumption.

A copy of the Premises Licence is attached to this document, and you should read and understand it. In particular, please familiarise yourself with the various hours during which licensable activities are permitted to take place, the area(s) in which they may take place, and conditions which are attached to the Premises Licence that must at all times.

As the Premises Licence authorises the retail sale of alcohol as a licensable activity, it is a requirement that an individual, referred to as the Designated Premises Supervisor (DPS) is specified. The DPS for the premises is (name) RAJITH SUBRAMANIAM

As you do not hold a Personal Licence under the Licensing Act 2003, it is a requirement that any sale of alcohol which you do make, has been correctly authorised by either the DPS or another individual who holds a Personal Licence. You are therefore being duly authorised by DPS (name) RAJITH SUBRAMANIAM or Personal Licence Holder (name) \_\_\_\_\_ to make sales of alcohol on their behalf, provided you ensure that the following requirements are met:

- Alcohol can only be sold on the following standard days and timings as in the attached Premises Licence.
- Adhered to any conditions on the licence.
- You must not sell alcohol to anyone under the age of 18.
- Anyone attempting to purchase alcohol who appears to be under the age of 25, must be asked to provide suitable identification, this includes: PASS proof of age card, Photo driving licences and passport.
- If such identification cannot be provided, or you have any doubts or concerns in any way, you should not proceed with making the sale.

DPS/ Personal Licence Holder name, signature and date. RAJITH SUBRAMANIAM = 20/11/24

➤ **CONFIRM THAT I HAVE READ AND UNDERSTAND THE ABOVE:**


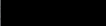
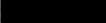
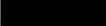
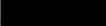


Staff Name	Signature	Date
<u>S. NARAYANAN</u>		<u>20/11/2024</u>
<u>A. KALAMOHAN</u>		<u>23/11/2024</u>
<u>Jonah Anthony</u>		<u>21/12/2024</u>
<u>F. PRANEE DGE</u>		<u>15/06/2025</u>
<u>W. ETHELILANA</u>		<u>16/06/2025</u>
<u>D.M. Ramepuria</u>		
<u>Haniffa</u>		



Exhibit Ref  
Description Of Item

Misc docs  
Photos

Authority to sell alcohol

I, RATHI SHERAMANIAM being a Personal Licence holder, hereby certify that D. M. RANEPURA HEWAGE has received training in licensing law, company policy and their responsibilities when selling alcohol.

I therefore authorise D.M. RANEPURA HEWAGE to sell alcohol by retail for consumption off the premises at TODAY'S EXTRA  
2 HORSE MARKET, CHANDOR, LIT 600P.

Signed [Redacted]  
Print Name D. M. Ranepura Hewage  
Dated 16/06/2025

I, D.M. Ranepura Hewage am aware of my responsibilities with regard to licensing law. I understand that I am authorised to sell alcohol.

Signed [Redacted]  
Print Name D.M. Ranepura Hewage  
Dated 16/06/2025

**Authority to sell alcohol**

I, RASITH SUBRAMANIAM being a Personal Licence holder, hereby certify that K.G. PRADEEP DEE WISETHILAKA has received training in licensing law, company policy and their responsibilities when selling alcohol.

I therefore authorise K.G. PRADEEP DEE WISETHILAKA to sell alcohol by retail for consumption off the premises at TODAY'S BARR 2 HORSE MARKET, CAISOR, LN7 6UP

Signed [REDACTED]  
Print Name RASITH SUBRAMANIAM  
Dated 15/06/2025

I, K.G. PRADEEP DEE WISETHILAKA am aware of my responsibilities with regard to licensing law. I understand that I am authorised to sell alcohol.

Signed [REDACTED]  
Print Name K.G. PRADEEP DEE WISETHILAKA  
Dated 15/06/2025

**Authority to sell alcohol**

I, RADITH SUBRAMANIAM, being a Personal Licence holder, hereby certify that JONAH ANTONY has received training in licensing law, company policy and their responsibilities when selling alcohol.

I therefore authorise JONAH ANTONY to sell alcohol by retail for consumption off the premises at TODAYS EXTRA 2 HORSE MARKET, CAISBORO LN 7 6UP

Signed [REDACTED]  
Print Name RADITH SUBRAMANIAM  
Dated 21/12/2024

I, Jonah Antony Joby, am aware of my responsibilities with regard to licensing law. I understand that I am authorised to sell alcohol.

Signed [REDACTED]  
Print Name Jonah Antony Joby  
Dated 21/12/2024

Authority to sell alcohol

I, Rajith Subramaniam being a Personal Licence holder, hereby certify that S. Nanthakumar has received training in licensing law, company policy and their responsibilities when selling alcohol.

I therefore authorise S. Nanthakumar to sell alcohol by retail for consumption off the premises at Today's Extra  
2 Horse Market, Cairns, LNT 7 LUP

Signed [Redacted]  
Print Name Rajith Subramaniam  
Dated 20/11/24

I, S. Nanthakumar am aware of my responsibilities with regard to licensing law. I understand that I am authorised to sell alcohol.

Signed [Redacted]  
Print Name S. Nanthakumar  
Dated 20/11/2024

Exhibit Ref  
Description Of Item

Authority to sell  
Photos

Sample Record Book – How to Record – Incident Record!

- Record all crimes reported to the venue.
- Record all ejections of patrons.
- Record any incidents of assault.
- Record any incidents of disorder.
- Record any fault in the CCTV system.
- Record any refusal of the sale of Alcohol and the name of the member of staff.
- Record who refused the sale.
- Record details of any officer of a responsible authority who visits the premises, including their name, job title and the responsible authority they represent.

INCIDENT RECORD				
Date & Time of the Incident	Personal Details of Person(s) Involved	Description of the Incident	Action Taken (Please record Ref number if applicable)	Name of the Employee recording the Incident
e.g. 25/05/2023 8pm	Drunken Male	Threw and Broke the Bottle on the Bar	Made a Record	A Robert
e.g. 31/05/2023 9am	Group of Young People	Making Nuisance, Gathering Near Alcohol Area	Asked to leave the Premises	M Kim
e.g. 12/12/2023 2pm	CCTV Broken Down/Fault	System Overloaded – Not Recording	Told the manager/ CCTV Technician Called in	B James
e.g. 26/12/2023 7pm	Customer Lady Look Age 50	Complained that her Daughter Bought Alcohol/Energy Drink	Report Taken, informed Manager, Asked the customer to come again when the manager is there	J Will

**Author: 3201299, Creation time: 17-06-2025 12:58:35**


[illegible]

Exhibit Ref  
Description Of Item


Incidents  
Photo

Please record all refusals on the register below

Refusals Register

NO.	Date	Product	Time	Name of person or description	Observations	Staff member
01	Example 01/01/2018	Cigarettes	7:10 PM	Male 16 years Blondie, 5ft 11"	Threatens and refusing to show ID	Allen Smith
02	02/11/2024	E-VAPE	16:21	A boy with white hoodie	LOOKS UNDER 25 - NO ID	Kaym
03	10/11/24	Sprer	16:15	19 years Kay with black hat	Under 25 NO ID	K. Netherland
04	19/11/24	Cigarette	12:28	A young boy with 2 maces	Look under 25 But - NO ID	Reah
05	14/12/24	B&B	19:32	Group of 7 people	NO - ID	Moham
06	14/12/25	Kristin Vape	20:44	Too young come	Change 25 for 18 years old	Rajith
07	26/1/25	E Vape	12:53	Very young boy	Look under 25 - NO ID	Rajith
08	07/02/25	Vape	19:01	Young boy - with blue jacket	Change 25 - 1850 13 years old boy	Fayin
Manager's Signature:				Date: 15/02/25		

Additional pages can be downloaded from [noidnosale.com](http://noidnosale.com)



Please record all refusals on the register below					Refusals Register	
NO.	Date	Product	Time	Name of person or description	Observations	Staff member
09	08/02/18	Cider	19.12	Young couples	NO ID	Nahom
10	08/02/18	Lost man - wine	18.53	Very young girl - Challenge 25.	16-17	Rashid
11	23/08/18	Cigarette	16.06	Young boy.	challenge 25	Moham
12	08/04/18	Scotch wine	19.42	Very young boy.	NO ID	Pegla
13	08/04/18	Vape.	11.02.	very young girl without ID	NO - 13 - 14	
14	11/04/18	Energy drink.	10.45	14 yrs old girl claimed to be 16	Asked for help	
15	18/04/18	E-wine	20.55	A young boy with blue jacket.	Asked for help	Rashid
16	03/05/18	Beer	20.44	A tall young boy with skin.	Challenge 25	Rashid
Manager's Signature:					Date:	

Additional pages can be downloaded from [noidnosale.com](http://noidnosale.com)





Please record all refusals on the register below						Refusals Register
No.	Date	Product	Time	Name of person or description	Observations	Staff member
17	27/09/25	HYGIA VAPES	12.10	Tall young boy with black top and blue jeans	Challenge 25-10-13. (Relaxed)	RASHID
18	06/06/25	Small Vodka	19.30	Two Teen age girls	Challenge 25-10-13. (Relaxed)	RASHID
19	06/06/25	35 CL Smirnoff vodka	20.56	A very young girl	Challenge 25-10-13. (Relaxed)	RASHID
20	12/06/25	Cigarettes + Vape	21.00	Slender young boy with short + styled hair	Challenge 25-10-13. (Relaxed)	RASHID
21						
22						
23						
24						
Manager's Signature:					Date:	
Additional pages can be downloaded from <a href="http://nolinosale.com">nolinosale.com</a>						

Exhibit Ref  
Description Of Item

Refusals log  
Photos



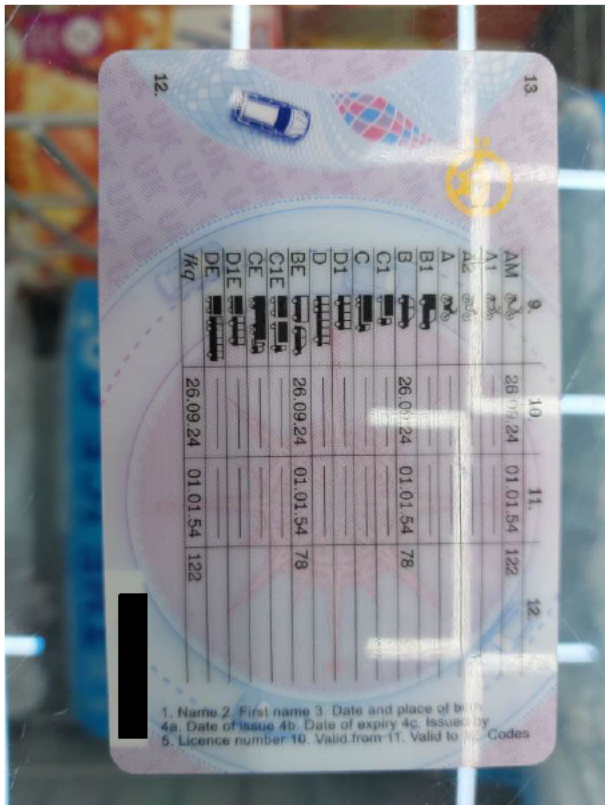


Exhibit Ref  
Description Of Item

Worker ID  
Photo

Incident details

Incident date  
Incident log number  
Incident number  
Entered by

1299, PC Rebeka Casey

Today's Caistor

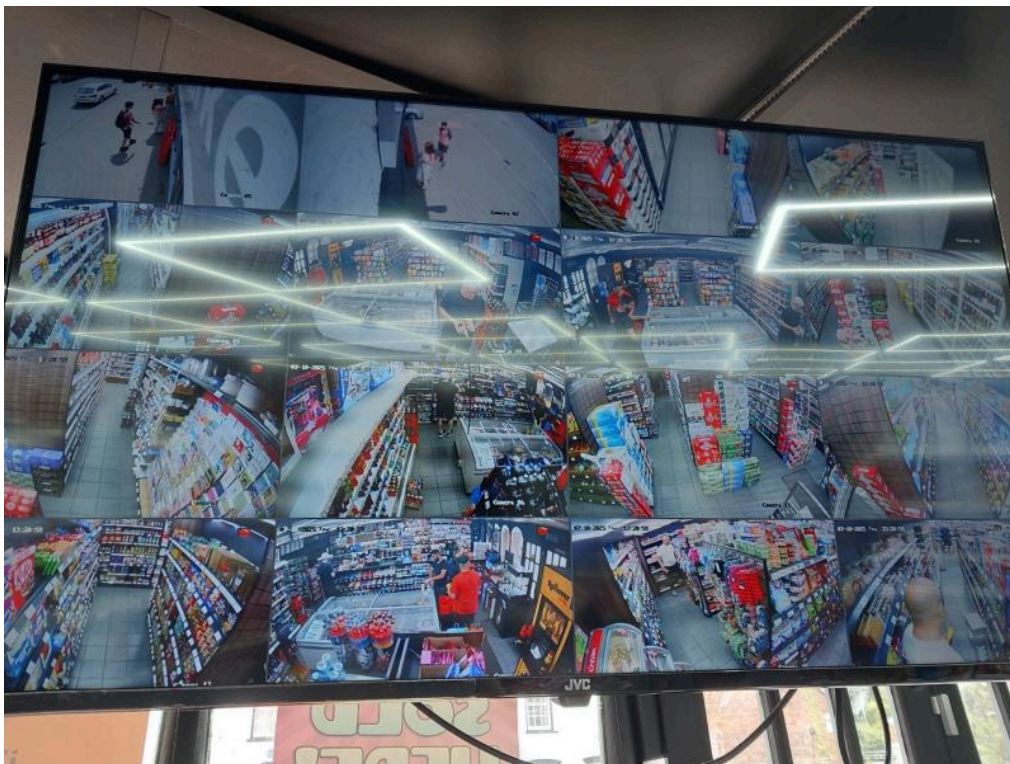
Attended to review CCTV met by staff member [REDACTED] who has been working at the shop for 1 week. Also works at the Stamford shop. (Full [REDACTED])

Live screen within shop displayed 16 camera angles.

CCTV only retained to 4th July not 28 days as per licence.

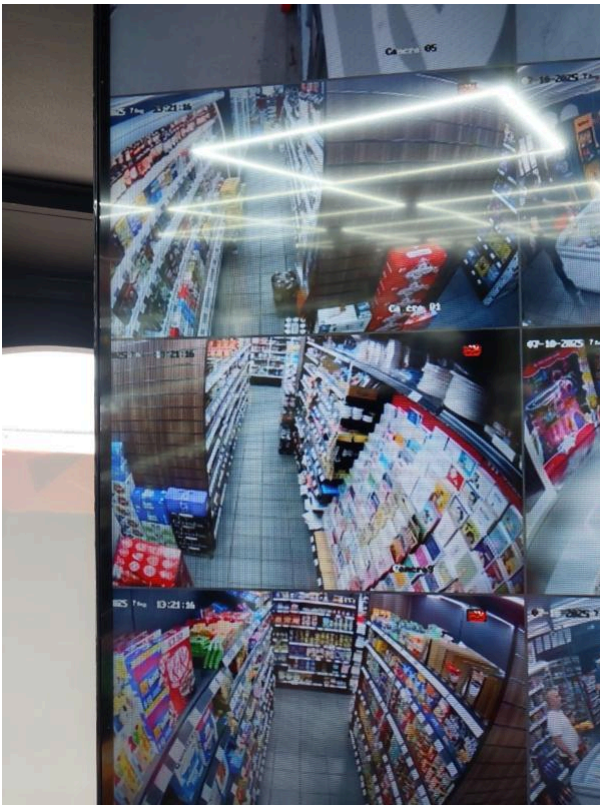
Footage from 17/06/25 could not be reviewed.

### Photograph(s)



OFFICIAL

Author: 3201299, Creation time: 10-07-2025 13:21:11

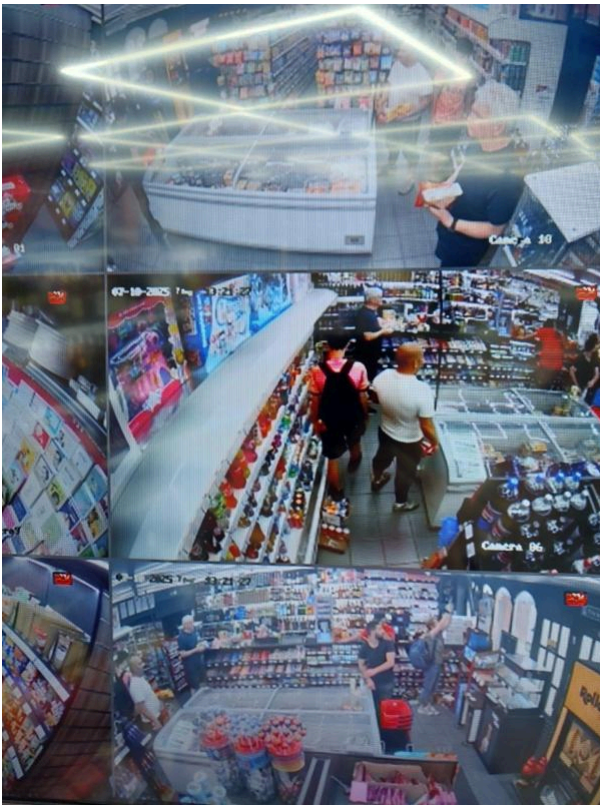


OFFICIAL



OFFICIAL

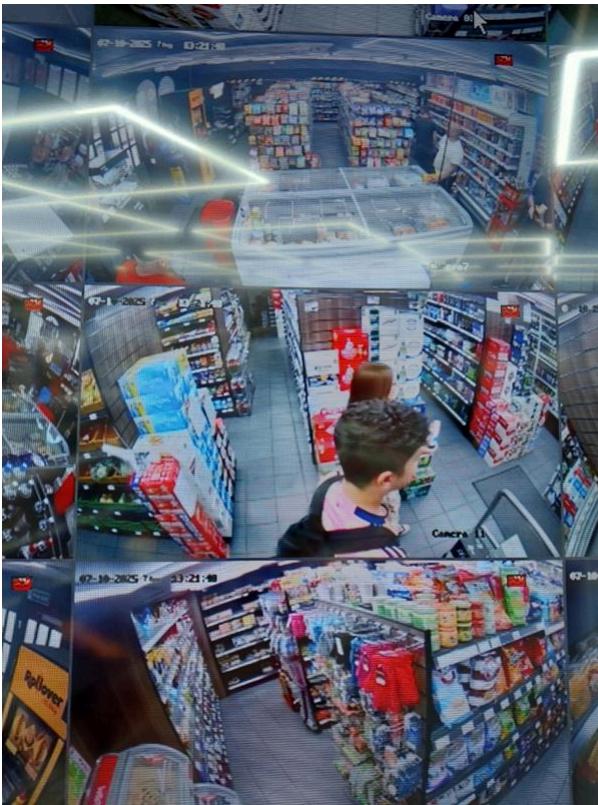
Author: 3201299, Creation time: 10-07-2025 13:21:11



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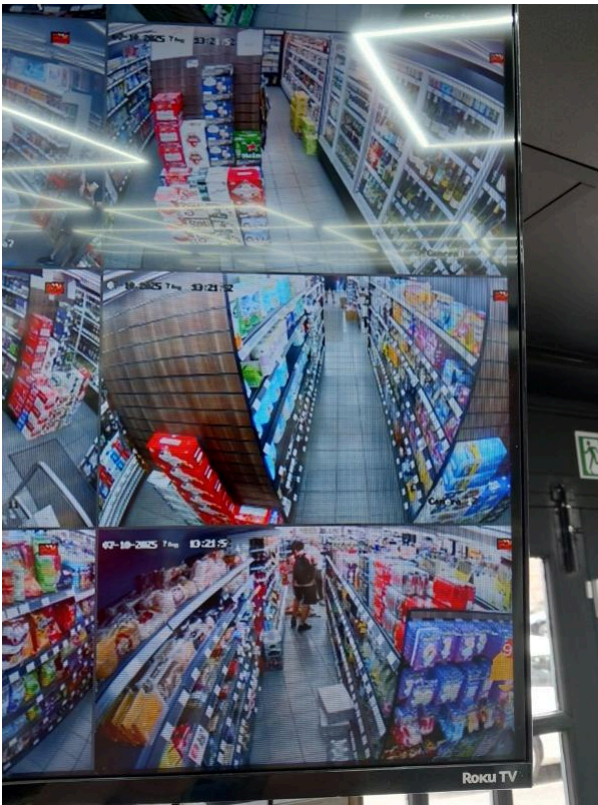
Author: 3201299, Creation time: 10-07-2025 13:21:11



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OFFICIAL

Author: 3201299, Creation time: 10-07-2025 13:21:11



OFFICIAL



OFFICIAL

Author: 3201299, Creation time: 10-07-2025 13:21:11

Exhibit Ref

Photo of CCTV coverage

Description Of Item

Photos



OFFICIAL

OFFICIAL

Author: 3201299, Creation time: 10-07-2025 13:21:11



OFFICIAL









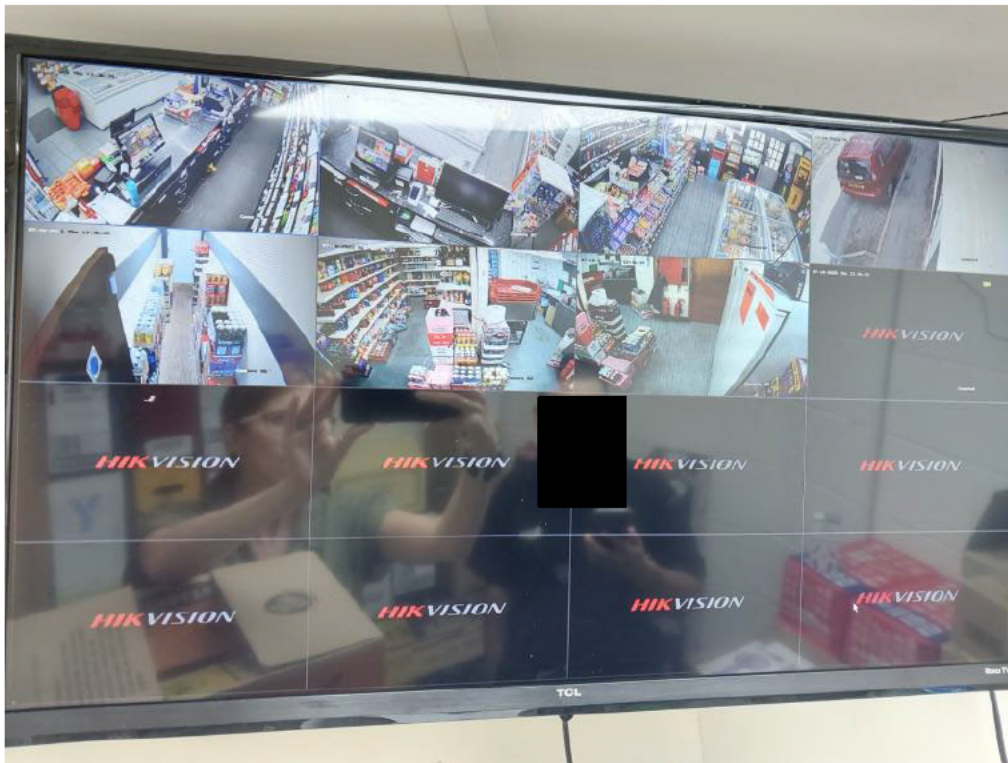


OFFICIAL

Author: 3201299, Creation time: 10-07-2025 13:21:11

Exhibit Ref  
Description Of Item

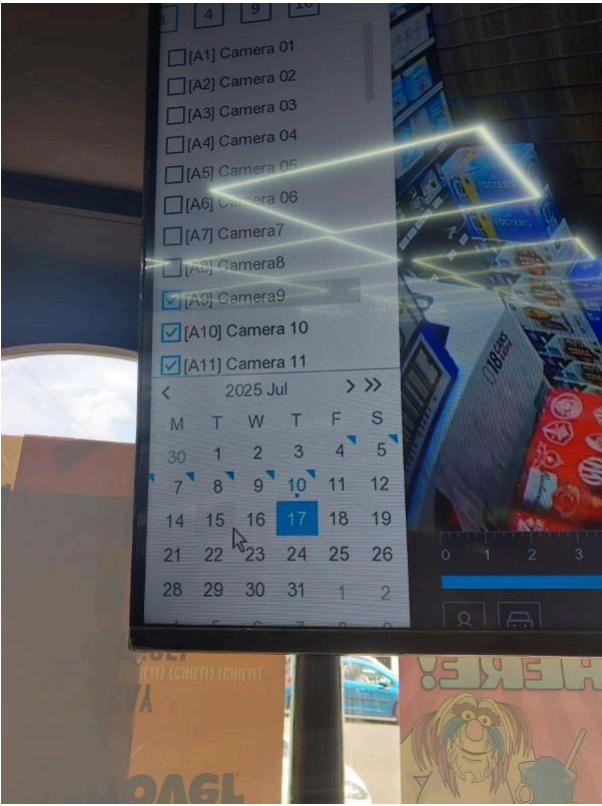
Rear of shop cameras  
Photo



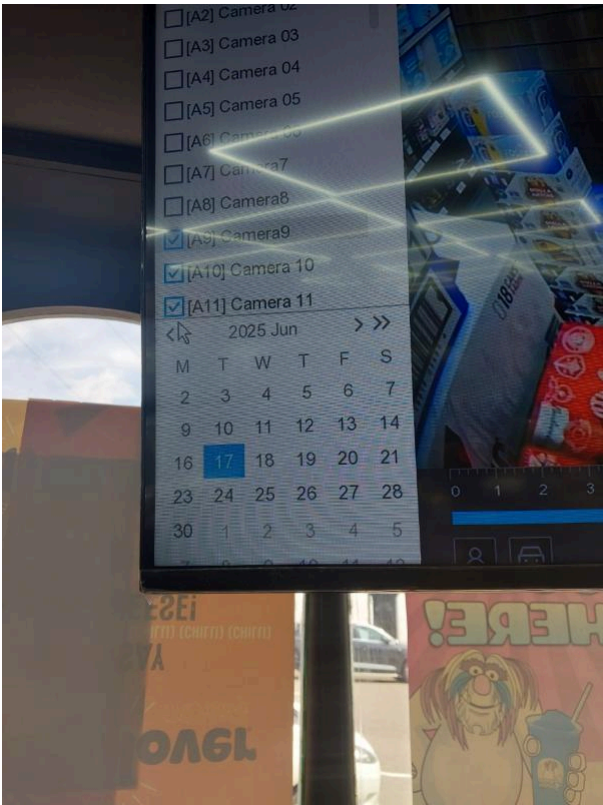
OFFICIAL

Exhibit Ref  
Description Of Item

Back office review  
Photo

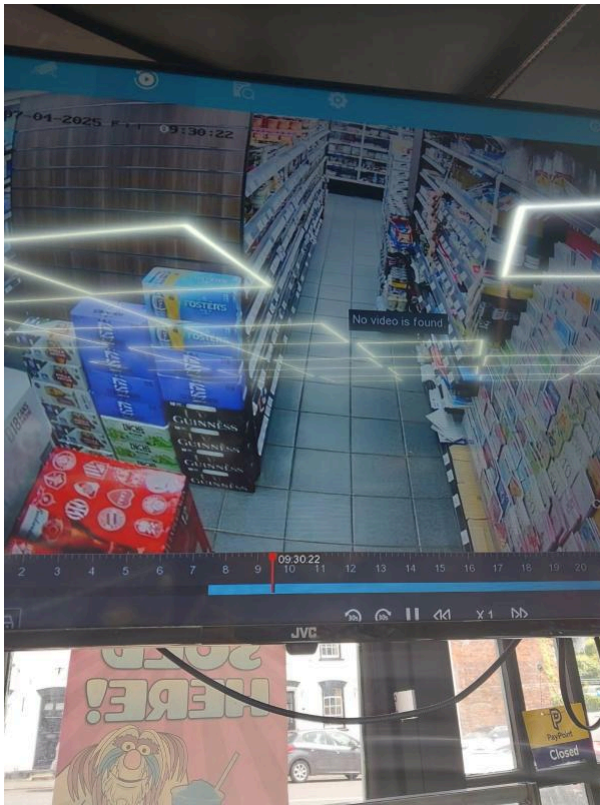






OFFICIAL

Author: 3201299, Creation time: 10-07-2025 13:21:11



OFFICIAL

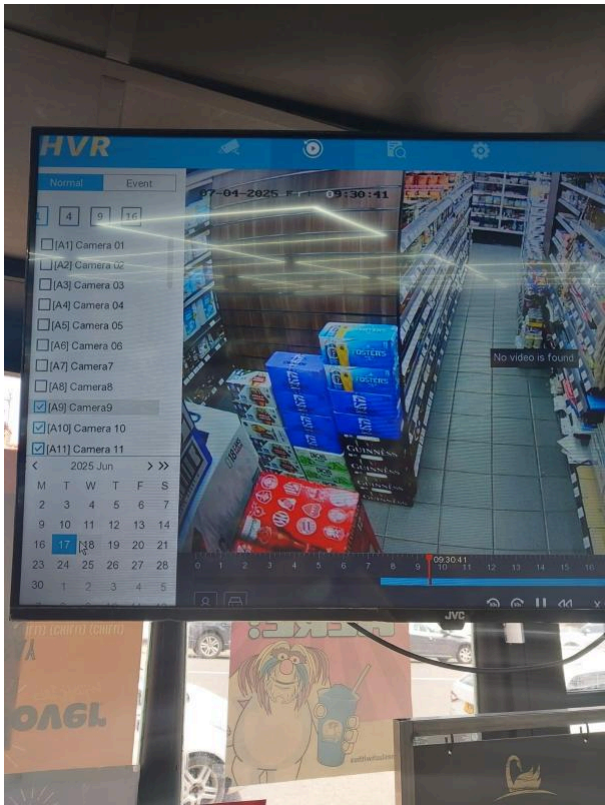


Exhibit Ref  
Description Of Item

CCTV retention period  
Photo

Sale of Alcohol When the DPS is Absent

Premises name and address TODAYS EXTRA  
2 HORSE MARKET, CAISOR, LINC., LN7 6UP  
Premises Licence Number 32 UM650 224  
Under the Licensing Act 2003 a Premises Licence has been granted to Premises Licence holder. The Premises Licence includes the permission to make retail sales of alcohol for consumption.

A copy of the premises licence is attached to this document, and you should read and understand it. In particular, please familiarise yourself with the various hours during which licensable activities are permitted to take place, the area(s) in which they may take place, and conditions which are attached to the Premises Licence that must at all times.

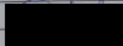
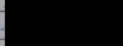
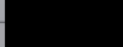





As the Premises Licence authorises the retail sale of alcohol as a licensable activity, it is required that an individual, referred to as the Designated Premises Supervisor (DPS) is specified. The DPS for the premises is (name) RAJITH SUBRAMANIAM

As you do not hold a Personal Licence under the Licensing Act 2003, it is a requirement that any sale of alcohol which you do make, has been correctly authorised by either the DPS or another individual who holds a Personal Licence. You are therefore being duty authorised by DPS (name) RAJITH SUBRAMANIAM or Personal Licence Holder (name) \_\_\_\_\_ to make sales of alcohol on their behalf, provided you ensure that the following requirements are met:

- Alcohol can only be sold on the following standard days and timings as in the attached Premises Licence.
- Adhered to any conditions on the licence.
- You must not sell alcohol to anyone under the age of 18.
- Anyone attempting to purchase alcohol who appears to be under the age of 25, must be asked to provide suitable identification, this includes PASS proof of age card, Photo driving licences and passport.
- If such identification cannot be provided, or you have any doubts or concerns in any way, you should not proceed with making the sale.

DPS/ Personal Licence Holder name, signature and date: RAJITH SUBRAMANIAM - 20/11/24

➤ CONFIRM THAT I HAVE READ AND UNDERSTAND THE ABOVE:

Staff Name	Signature	Date
<u>S. NANTAKUMAR</u>		<u>20/11/2024</u>
<u>A. KALAMATHAN</u>		<u>23/11/2024</u>
<u>Jonah Antony</u>		<u>21/12/2024</u>
<u>F. G. PRABHA DEE</u>		<u>15/06/2025</u>
<u>WSETHILAKA</u>		<u>16/06/2025</u>
<u>D.M. Rameepura</u>		<u>30/06/2025</u>
<u>VELUPILLAI</u>		<u>30/06/2025</u>
<u>MATHAN MEER</u>		<u>30/06/2025</u>

**Authorise to Sell**


Name of premises TODAYS EXTRA

Premises licence holder GRANTHAM CUPPY POT LTD

DPS REBEKAH SUBRAMANIAM

I, REBEKAH SUBRAMANIAM being the holder of a personal licence and the DPS of the above licensed premises, authorise the staff named below to make sales of alcohol under the terms of the above premises licence and in accordance with the Licensing Act 2003.

Staff have been made aware of their legal responsibilities in terms of the sale of alcohol under the Licensing Act 2003. This authorisation applies at all times including when I am not present. I can be contacted on the number below.

Signed  Date 20/11/24 Contact number 074300 411 44

**Staff**


I can confirm that I am aware that it is an offence to:

Knowingly sell, attempt to sell or allow the sale of alcohol to persons who are drunk;

Sell alcohol to a person under the age of 18;

Sell or allow the sale of alcohol at any other times other than the hours stated on the licence and in accordance with the licence conditions;

I understand that the shop operates a Challenge 25 policy and that I must check valid appropriate photographic ID of anyone who appears under 25 to ensure that alcohol is only sold to persons over the age of 18 years old.

Name	Signed	Date (s)
<u>S. NANTHAKUMAR</u>		<u>20/11/2024</u>
<u>A. KALAMOKIAN</u>		<u>23/11/2024</u>
<u>Sonah Ambury</u>		<u>21/12/2024</u>
<u>PAUL PATEL</u>		<u>16/02/2025</u>
<u>D.M. Rangapuri Hewange</u>		<u>16/06/2025</u>
<u>V. MATHAVAMEJAN</u>		<u>30/06/2025</u>

This form to be kept on the premises and made available for inspection by the responsible authority

Exhibit Ref

Description Of Item

Staff training

Photo's

Incident details

Incident date

Incident log number

Incident number

Entered by

1299, PC Rebeka Casey

**From:** [Casey, Rebeka \(1299\)](#)  
**To:** [Arumugam Kalamohan](#)  
**Subject:** Re: \*PLEASE REPLY\* RE: Today's, 2 Horsemarket, Caistor - Licensing visit  
**Date:** 10 July 2025 13:19:39  
**Attachments:** [image001.png](#)  
[image011.png](#)  
[png-img-2220c3de-7647-43f2-8d9e-c5f5d232f540.png](#)  
[png-img-bff77cbb-8786-4446-bdf2-75fd26d75ac4.png](#)

---

Good Afternoon

Thanks for getting back to me unfortunately I have only just picked up your email as I've been travelling. I've just arrived at Caistor so will speak to [REDACTED].

*Kind regards,  
Rebeka*

## PC 1299 Rebeka Casey

Licensing Officer

---

ALCOHOL LICENSING TEAM



[07973 845578](tel:07973845578)



[rebeka.casey@lincs.police.uk](mailto:rebeka.casey@lincs.police.uk)



Lincolnshire Police Headquarters, Deepdale Lane, Nettleham LN2 2LT



[www.lincs.police.uk](http://www.lincs.police.uk)



[@LincsPolice](https://twitter.com/LincsPolice)



[Lincolnshire Police](https://www.facebook.com/LincsPolice)



[@LincsPolice](https://www.instagram.com/LincsPolice)



[nextdoor.co.uk](https://nextdoor.co.uk)

---

**WORKING TOGETHER TO MAKE LINCOLNSHIRE THE SAFEST PLACE TO LIVE, WORK AND VISIT**



---

**From:** Arumugam Kalamohan [REDACTED]  
**Sent:** Thursday, July 10, 2025 11:51:53 AM  
**To:** Casey, Rebeka (1299) <[rebeka.casey@lincs.police.uk](mailto:rebeka.casey@lincs.police.uk)>; [REDACTED]  
[REDACTED]  
**Subject:** Re: \*PLEASE REPLY\* RE: Today's, 2 Horsemarket, Caistor - Licensing visit

**Caution:** This email originated from outside of the Force. Do not click links or open attachments unless you recognise the sender and know the content is safe.





---

**From:** Casey, Rebeka (1299)

**Sent:** 07 July 2025 13:20

**To:** Arumugam Kalamohan [REDACTED]; RAJITHMANIAM [REDACTED]

**Subject:** RE: Today's, 2 Horsemarket, Caistor - Licensing visit

Good Afternoon,

I am now in receipt of the CCTV that I requested from 17/06/25 but unfortunately do not seem to have all cameras. Cameras 1-7 are working but camera 8 is blanked out. I do not appear to have any footage from the rear section of the shop.

I would like to arrange to review the footage with you on site.

Rajith - Can you advise if you are on the premises tomorrow afternoon or Thursday at all please?

*Kind regards,  
Rebeka*

**PC 1299 Rebeka Casey**

Licensing Officer

---

ALCOHOL LICENSING TEAM



07973 845578



[rebeka.casey@lincs.police.uk](mailto:rebeka.casey@lincs.police.uk)



Lincolnshire Police Headquarters, Deepdale Lane, Nettleham LN2 2LT



[www.lincs.police.uk](http://www.lincs.police.uk)



[@LincsPolice](https://twitter.com/LincsPolice)



[Lincolnshire Police](https://www.facebook.com/LincolnshirePolice)



[@LincsPolice](https://www.instagram.com/LincsPolice)



[nextdoor.co.uk](https://www.nextdoor.co.uk)

---

**WORKING TOGETHER TO MAKE LINCOLNSHIRE THE SAFEST PLACE TO LIVE, WORK AND VISIT**





---

**From:** Arumugam Kalamohan [REDACTED] k>  
**Sent:** 26 June 2025 13:08  
**To:** Casey, Rebeka (1299) <[rebeka.casey@lincs.police.uk](mailto:rebeka.casey@lincs.police.uk)>  
**Cc:** [RAJITHMANIAM](#) [REDACTED]  
**Subject:** Re: Today's, 2 Horsemarket, Caistor - Licensing visit

**Caution:** This email originated from outside of the Force. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Good Afternoon,

We haven't heard back from you.

Footage with the details you requested is recorded in pen drive and ready for collection.

Kindly get back.

Thanks  
Kind Regards

Kalamohan

---

**From:** Arumugam Kalamohan <[REDACTED]>  
**Sent:** 18 June 2025 14:11  
**To:** Casey, Rebeka (1299) <[rebeka.casey@lincs.police.uk](mailto:rebeka.casey@lincs.police.uk)>  
**Cc:** [RAJITHMANIAM](#) [REDACTED] <[RAJITHMANIAM](#) [REDACTED]>  
**Subject:** Re: Today's, 2 Horsemarket, Caistor - Licensing visit

Good Afternoon,

Since you requested all footages of cameras it is difficult to download and email as the file size is large.

I have ordered USB drive once received will save the footage and notify you for collection.

However, if you require footage earlier, please send USB to store I will record it for you to collect it in 2 to 3 hrs time.

Let us know.

Thanks

Kind Regards

Kalamohan

---

**From:** Casey, Rebeka (1299) <[rebeka.casey@lincs.police.uk](mailto:rebeka.casey@lincs.police.uk)>  
**Sent:** 17 June 2025 14:30  
**To:** [REDACTED] >  
**Subject:** FW: Today's, 2 Horsemarket, Caistor - Licensing visit

Good Afternoon,

Further to our conversation earlier today please can you provide me with CCTV from the premises between 10:00 and 11:15 today (17/06/25). At this stage I would like footage from all camera angles.

In relation to the illegal worker I encountered - I will be in touch in due course.

*Kind regards,*  
*Rebeka*

**PC 1299 Rebeka Casey**

Licensing Officer

---

ALCOHOL LICENSING TEAM



07973 845578



[rebeka.casey@lincs.police.uk](mailto:rebeka.casey@lincs.police.uk)



Lincolnshire Police Headquarters, Deepdale Lane, Nettleham LN2 2LT



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**WORKING TOGETHER TO MAKE LINCOLNSHIRE THE SAFEST PLACE TO LIVE, WORK AND VISIT**



---

**From:** Casey, Rebeka  
**Sent:** 01 October 2024 15:52  
**To:** [REDACTED]  
**Cc:** Tracy Gavins <[tracy.gavins@west-lindsey.gov.uk](mailto:tracy.gavins@west-lindsey.gov.uk)>  
**Subject:** FW: Today's, 2 Horsemarket, Caistor - Licensing visit

Apologies – this time with Tracy copied in.





*Kind regards,  
Rebeka*

**PC 1299 Rebeka Casey**  
Licensing Officer

---

ALCOHOL LICENSING TEAM



 07973 845578  
 [rebeka.casey@lincs.police.uk](mailto:rebeka.casey@lincs.police.uk)  
 Lincolnshire Police Headquarters, Deepdale Lane, Nettleham LN2 2LT  
 [www.lincs.police.uk](http://www.lincs.police.uk)



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**WORKING TOGETHER TO MAKE LINCOLNSHIRE THE SAFEST PLACE TO LIVE, WORK AND VISIT**

---

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**From:** Casey, Rebeka  
**Sent:** Tuesday, October 1, 2024 3:39 PM  
**To:** [mohanretai](#) [REDACTED]  
**Subject:** Today's, 2 Horsemarket, Caistor - Licensing visit

Good Afternoon Mr Kalamohan,

This is an email to follow on from my visit with colleagues last Friday (27<sup>th</sup> September 24). As you know we attended to carry out a routine compliance check and whilst there we encountered a staff member who did not have the permission to work in the UK.

Despite there being a comprehensive licensing folder on site, unfortunately, most of the documentation/training was blank with staff signatures missing from the relevant paperwork. CCTV did not record for the 28 days as required on the premises licence appearing to only retain for 23 days.

I have copied in Tracy Gavins at West Lindsey Council licensing so that she is aware of our correspondence as she was with me during the visit on Friday.

Please ensure you work to rectify these issues ASAP to uphold the licensing objectives and be compliant with the premises licence.

*Kind regards,  
Rebeka*

## PC 1299 Rebeka Casey

Licensing Officer

---

ALCOHOL LICENSING TEAM



07973 845578



[rebeka.casey@lincs.police.uk](mailto:rebeka.casey@lincs.police.uk)



Lincolnshire Police Headquarters, Deepdale Lane, Nettleham LN2 2LT



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**WORKING TOGETHER TO MAKE LINCOLNSHIRE THE SAFEST PLACE TO LIVE, WORK AND VISIT**

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**Application for the review of a premises licence or club premises certificate under the  
Licensing Act 2003**

**PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST**

Before completing this form please read the guidance notes at the end of the form.  
If you are completing this form by hand please write legibly in block capitals. In all cases ensure  
that your answers are inside the boxes and written in black ink. Use additional sheets if necessary.  
You may wish to keep a copy of the completed form for your records.

**I** Paul Gibson, Chief Constable of Lincolnshire Police

*(Insert name of applicant)*

**apply for the review of a premises licence under section 51 / apply for the review of a club  
premises certificate under section 87 of the Licensing Act 2003 for the premises described in  
Part 1 below (delete as applicable)**

**Part 1 – Premises or club premises details**

<b>Postal address of premises or, if none, ordnance survey map reference or description</b>  Todays Local 10 Red Lion Square Stamford	
<b>Post town</b> Lincolnshire	<b>Post code (if known)</b> PE9 2AJ

<b>Name of premises licence holder or club holding club premises certificate (if known)</b>  Mohan Retail Ltd
---

<b>Number of premises licence or club premises certificate (if known)</b>  18188
--

**Part 2 - Applicant details**

I am

Please tick ✓ yes

1) an individual, body or business which is not a responsible  
authority (please read guidance note 1, and complete (A)  
or (B) below)

2) a responsible authority (please complete (C) below)



3) a member of the club to which this application relates  
(please complete (A) below)

**(A) DETAILS OF INDIVIDUAL APPLICANT** (fill in as applicable)

Please tick ✓ yes

Mr

Mrs

Miss

Ms

Other title  
(for example, Rev)

**Surname**

**First names**

Please tick ✓ yes

**I am 18 years old or over**

**Current postal  
address if  
different from  
premises  
address**

**Post town**

**Post Code**

**Daytime contact telephone number**

**E-mail address  
(optional)**

**(B) DETAILS OF OTHER APPLICANT**

Name and address

Telephone number (if any)

E-mail address (optional)

**(C) DETAILS OF RESPONSIBLE AUTHORITY APPLICANT**

Lincolnshire Police Alcohol Licensing Deepdale Lane Nettleham Lincoln Lincolnshire LN2 2LT
Telephone number (if any) 101
E-mail address (optional) Countylicensinggroup@lincs.pnn.police.uk

**This application to review relates to the following licensing objective(s)**

- 1) the prevention of crime and disorder
- 2) public safety
- 3) the prevention of public nuisance
- 4) the protection of children from harm

Please tick one or more boxes ✓  
X



**Please state the ground(s) for review** (please read guidance note 2)

This review application relates to a premises which operates as a general convenience store in the centre of Stamford Town Centre with high footfall, offering food and drink to the local community. It has been granted a Premises Licence 18188 by South Kesteven District Council.

The current premises licence holder is Mohan Retail Ltd (company number 07585287) with Arumugam Kalamohan as the sole director. The designated premises supervisor is Santhosh Sekar.

The licence authorises the sale of alcohol and opening hours between 06:00 to 02:00 Monday to Sunday.

Lincolnshire Police have obtained evidence which indicates that the management of these premises has been operating it in such a manner that amounts to criminal activity and thus undermines the licencing objective of the prevention of crime and disorder.

In relation to this review application the following guidance issued under Section 182 of the Licensing Act 2003 has been considered:

**Revised Guidance issued under Section 182 of the Licensing Act 2003**

*Section 2.1 states licensing authorities should look to the Police as the main source of advice on crime and disorder.*

*Section 10.29 states in addition, every premises licence that authorises the sale of alcohol must require that every supply of alcohol under the premises licence must be made or authorised by a person who holds a personal licence.*

*Section 10.32 states the following factors should be relevant in considering whether or not an authorisation has been given:*

- the person(s) authorised to sell alcohol at any particular premises should be clearly identified;*
- the authorisation should have specified the acts which may be carried out by the person who is authorised to supply alcohol;*
- there should be an overt act of authorisation, for example, a specific written statement given to the individual who is authorised to supply alcohol; and*
- there should be in place sensible arrangements for the personal licence holder to monitor the activity that they have authorised on a reasonably regular basis.*

*Section 10.33 states it is strongly recommended that personal licence holders give specific written authorisations to individuals whom they are authorising to retail alcohol. A single written authorisation would be sufficient to cover multiple sales over an unlimited period. This would assist personal licence holders in demonstrating due diligence should issues arise with enforcement authorities; and would protect employees if they themselves are challenged in respect of their authority to sell alcohol.*

*Section 10.35 states it must be remembered that while the designated premises supervisor or a personal licence holder may authorise other individuals to sell alcohol in their absence, they are responsible for any sales that may be made. Similarly, the premises licence holder remains responsible for ensuring that licensing law and licence conditions are observed at the premises.*

All of the section 11 guidance is based on reviews:

*Section 11.23 states where the premises are found to be trading irresponsibly, the licensing authority should not hesitate, where appropriate to do so, to take tough action to tackle the problems at the premises.*

*Section 11.24 states a number of reviews may arise in connection with crime that is not directly connected with licensable activities.*

*Section 11.25 states that in any case, it is for the licensing authority to determine whether the problems associated with the alleged crimes are taking place on the premises and affecting the promotion of the licensing objectives.*

*Section 11.26 states that where the licensing authority is conducting a review on the grounds that the premises have been used for criminal purposes, it is solely to determine what steps should be taken in connection with the premises licence, for the promotion of the crime prevention objective. The licensing authority's duty is to take steps with a view to the promotion of the licensing objectives and the prevention of illegal working in the interests of the wider community and not those of the individual licence holder.*

*Section 11.27 states that there is certain criminal activity that may arise in connection with licensed premises which should be treated particularly seriously. These are the use of licensed premises;*

*- for employing a person who is disqualified from that work by reason of their immigration status in the UK.*

*Section 11.28 states it is envisaged that licensing authorities, the police, the Home Office (Immigration Enforcement) and other law enforcement agencies, which are responsible authorities, will use the review procedures effectively to deter such activities and crime. Where reviews arise and the licensing authority determines that the crime prevention objective is being undermined through the premises being used to further crimes, it is expected that revocation of the licence – even in the first instance – should be seriously considered.*

**South Kesteven District Council statement of licensing policy (2021 – 2026)** also raises the following points that are deemed relevant to this application:

*1.17 In undertaking its licensing function, the Licensing Authority is also bound by other legislation including, but not exclusively:*

- *Section 17 of the Crime and Disorder Act 1998 – which imposes a duty on every Local Authority to do all that it reasonably can to prevent crime and disorder in its decision-making process.*

*4.1 Each of the four licensing objectives is of equal importance. The Licensing Authority considers the effective and responsible management of the premises and the instruction, training and supervision of staff and the adoption of best practice to be amongst the most essential control measures for the achievement of the licensing objectives.*

**4.3 The Prevention of Crime and Disorder**

*In accordance with the Guidance, Police views on matters relating to crime and disorder will be given considerable weight. There are many steps an applicant may make to prevent crime and disorder. The Licensing Authority will look to the Police for the main source of advice on these matters. (those relevant to this application are below)*

- *Provision of CCTV in and around the premises.*

**Crime and Disorder Act 1998 Section 17:**

*Duty to consider crime and disorder implications.*

*(1) Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent,*

*(a) crime and disorder in its area (including anti-social and other behaviour adversely affecting*

*the local environment); and*

*(b) the misuse of drugs, alcohol and other substances in its area, and*

*(c) re-offending in its area*

*(2) This section applies to each of the following—*

*.a local authority .....*

**Please provide as much information as possible to support the application** (please read guidance note 3)

Lincolnshire Police feel it necessary to outline their history with Mr Kalamohan and his licenced premises elsewhere in the county to give context to this re-view application.

In October 2018, Today's Express, Market Place, Grantham, a premises controlled by Mr Kalamohan was reviewed due to illegal working, selling alcohol below the mandatory price, and non-compliance. This was again initiated by Lincolnshire Police (*see appendix 1 for police review application*), and the Committee made the decision to revoke this premises licence (*see appendix 2 for hearing notes and decision notice*).

In 2020, Today's Extra, 50 Kesteven Road, Stamford was reviewed. Mr Kalamohan was premises licence holder at that time. The review was initiated by Lincolnshire Police (*see appendix 3 for police review application*) following a visit made by Police and Immigration in March 2020. During this visit, an illegal worker was encountered, in addition to two persons located in the staff accommodation area with no right to work who were believed to be workers at the premises. Various non-compliance issues were also highlighted. At hearing, the Committee made the decision to modify the licence to include more stringent conditions relating to staff training and refresher training, checks and recording of employees right to work. (*see appendix 4 for meeting minutes and decision notice*).

Due to persistent and serious concerns about Mr Kalamohan's ability to manage licensed premises, Lincolnshire Police feel that this review is necessary. Mr Kalamohan also has control of two other convenience stores that also each hold a premises licence, Today's Local 10 Red Lion Square, Stamford and Today's 2 Horsemarket Caistor, both of these premises are also currently subject to licence reviews instigated by Lincolnshire Police.

Full details of the concerns Lincolnshire Police have in relation to the 50 Kesteven Road Stamford premises can be found in the review application submitted alongside this review (*see appendix 14*).

The review application submitted by Lincolnshire Police for 2 Horsemarket, Caistor, in summary provides evidence of two separate occasions where police have encountered illegal working alongside non-compliance issues (*see appendix 13 for review application*).

Lincolnshire Police find themselves in a position where they can demonstrate Mr Kalamohan cannot operate responsibly under the Licensing Act 2003, the licensing objective and associated legislation.

This premises with licence 18188 under review has been visited by police on four separate occasions over the last two years, and consistent issues have been encountered during every visit. During this period Mr Kalamohan has

always held the premises licence in his company's name – Mohan Retail, but there have been various different designated premises supervisors (DPS) not including Mr Kalamohan. These visits are summarised below:

### **2<sup>nd</sup> August 2023**

A Police Licensing inspection was carried out, and non-compliance including, the absence of a personal licence holder on the premises and a lack of signage were noted (*see appendix 5 for Pc Braithwaite's statement*).

During the visit a lone worker was encountered. His details were passed to the National Command and Control Unit (NCCU) for Immigration over the phone at the time of the visit. NCCU confirmed his status was in question, and Immigration officers would require a re-visit. There was not enough information available at the time to take any action or confirm that he did not have the right to work in the shop.

An email was sent to Mr Kalamohan following this visit, informing him that areas of non-compliance had been discovered in his shop, requesting he address this to ensure full compliance. Mr Kalamohan simply replied with the contact details for the DPS at the time – Ms Narmatha Rasathurai and copied her into the email trail (*see appendix 6 for emails*). He did not make any comment regarding the non-compliance issues.

### **3<sup>rd</sup> October 2023**

A Police Licensing inspection was carried out in company with Immigration officers. A lone worker encountered was arrested by Immigration and Immigration informed the police that they believed that he did not have the right to work (*see appendix 11 for Immigration interview with worker*). He was arrested for being an overstayer. This male was the same worker who had been encountered working alone in the shop of the 2<sup>nd</sup> August 2023. The same non-compliance issues were again discovered during this visit. (*see appendix 5 for Pc Braithwaite's statement*).

The DPS at the time of this visit was still Ms Narmatha Rasathurai.

Immigration officers referred this case to the Home Office Civil Penalty Compliance Team for a civil penalty to be issued, however no further action was taken. Whilst Lincolnshire Police acknowledge no further action was taken by the Home Office on this occasion, Immigration officers informed police that they believed the worker encountered was working without the correct right to work entitlement, which does amount to a crime. Although the penalty was not issued on this occasion, it does not alter the circumstances, and in conjunction with the confirmed illegal workers discovered at Mr Kalamohan's other shops previously, we feel this should be seen as more than just merely coincidental.

### **7<sup>th</sup> November 2024**

A Police Licensing inspection was carried out in company with Immigration officers. Various non-compliance of conditions were discovered and included, the absence of a premises licence on site, the absence of a personal licence holder on site, CCTV issues, an invalid DPS authority, a disorganised and outdated refusals register, lack of shop signage in relation to customers leaving quietly, alcohol found on sale in areas of the shop it was not permitted (*see appendix 7 for Sgt Adams's statement and appendix 8 for images and evidence taken as exhibit ACA1*).

Although the shop worker at the time was checked by Immigration and found to be legally entitled to work, Sgt Adams documents in her statement a suspicious male encountered just outside the premises who appeared to be connected with the premises. His details were checked, and he was found to have no right to work (*see appendix 12 for Immigration evidence*). Although at the time, there was no direct evidence the male had been working, particularly due to CCTV not being reviewable at the premises, the male was found with Mr Kalamohan's bank card in his phone case.

An email was sent to Mr Kalamohan following this visit requesting urgent action was taken to rectify the issues, however in his response he did not acknowledge or provide any comment regarding the concerns, despite the warning given to him that proceedings under the Licensing Act 2003 would be considered should the premises be found in breach its conditions again.

Police also requested CCTV footage for this premises for a three-hour period on the 7<sup>th</sup> November 2024 and a staff list for that same date. The purpose of this request was to establish if the suspicious male with no right to work had indeed been working at the premises.

In Mr Kalamohan's response, he provided a list of individuals that had apparently worked at the shop that day, of which the male did not feature. He suggested that the length of CCTV footage time requested may have been too large to copy.

A CCTV storage device was provided to the police, however it did not contain any footage from this premises at all. When Mr Kalamohan was questioned about this, he stated he had attempted to re-copy it but it had dropped off the system. (*see appendix 9 for email conversations*).

The concern at this time was that this may well have been a deliberate act of avoidance by Mr Kalamohan to provide CCTV, to prevent the police discovering the male had actually been working in this shop. This is the type of suspicious behaviour around CCTV was documented when Pc Casey visited the premises in Caistor and during the subsequent follow-up enquiries with Mr Kalamohan in relation to an illegal worker discovered there (*see appendix 11, page 8 of the Caistor shop review application*).

On the 20<sup>th</sup> November 2024 Lincolnshire Police received a DPS variation for this premises from Ms Rasathurai to a Thasatharan Amirthalingham. Mr

Kalamohan had mentioned in his email on the 22<sup>nd</sup> November that Ms Rasathurai had quit her job, but it is suspected that this had actually been a tactic deployed in an attempt for Mr Kalamohan to relinquish his responsibility for failings at the premises.

### **17<sup>th</sup> June 2025**

A Police Licensing inspection was carried out at the premises and virtually the same various non-compliance issues discovered on the 7<sup>th</sup> November 2024 were discovered (*see appendix 7 for Sgt Adams's statement*).

At the point of this visit, the position of DPS had been varied to a Santhosh Sekar. Lincolnshire Police had received this variation application on the 14<sup>th</sup> April 2025, and to date this person who is the current DPS for the premises.

During all visits to this premises highlighted above, the multiple occasions where non-compliance of the annex 2 of the licence amount to s.136 offences under the Licensing Act 2004 – unauthorised licensable activity.

Also, during these visits, quantities of non-priced alcohol have been witnessed which is an offence under the Price Marking Order Act 2004 (*for images taken see appendix 10 for exhibit KB01 alongside appendix 8 for exhibit ACA1*).

Lincolnshire Police deem the management of the premises to be unacceptable and feel that Mr Kalamohan has been given sufficient and appropriate warnings/advice regarding all three shops which now face review.

It is a major concern that having narrowly avoided revocation of the 50 Kesteven Street licence in 2020, and also experiencing the revocation of the Market Place Grantham licence in 2018 (due to the same issues as present), Mr Kalamohan still cannot get his operations right. We would argue that this cannot simply be a case of lack of understanding, more likely blatant disregard on the part of Mr Kalamohan.

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 must carry out various checks to ensure that their staff are legally allowed to work.

Where an employer pays wages to illegal workers off record with no tax or national insurance deductions which are then deliberately omitted from an employers End of Tax Year P35 returns to HMRC, the employer may be dealt with by means of the Fraud Act 2006. Similarly, HMRC may take action as a civil proceedings case and raise a tax debt against the business.

Illegal workers are more than likely poorly paid for the hours they are required to work and are not subject to the benefit of a minimum wage or restricted hours

as prescribed in law. Nor are they afforded the benefit of the protections offered by UK employment legislation and are therefore often exploited.

Lincolnshire has led the way with how illegal working within licenced premises and its impact on how the crime prevention objective should be viewed. The stated case of East Lindsey District Council v Abu Hanif in 2016 involved an illegal worker in a licenced premises in Lincolnshire in April 2014, where a civil penalty was later issued by immigration. The premises licence was reviewed and revoked, an appeal followed which was successful, based on the argument that a civil penalty was not a prosecution and so did not concern the crime prevention objective. East Lindsey District Council then appealed that decision by way of a case stated, arguing that it was not necessary for a crime to have been reported, prosecuted, or established in a court of law in order for the crime prevention objective to be engaged. That the licensing objectives were prospective and were concerned with the avoidance of harm in the future. Mr Justice Jay upheld the councils appeal, citing defrauding the revenue and exploitation of vulnerable individuals by not paying minimum wage as evidence of the commission of criminal offences, and the fact that the employee could not provide the required paperwork as clear inference that Mr Hanif well knew that he was employing an illegal worker.

Lincolnshire Police feel the licence this premises operates under has become outdated, with poorly worded conditions that are not specific or measurable enough for this type of business operation. They lack detail in relation to requirements around CCTV, staff training, incident and refusals recording, and age verification policy. There is also an absence of any conditions in relation to staff right to work checks and recording.

But that said, all these conditions are present on the 50 Kesteven Road premises licence, and the review application submitted for that particular premises evidences the consistent failure over a two-year period by Mr Kalamohan to adhere to a robust set of conditions.

Lincolnshire Police have no confidence in the ability of Mr Kalamohan to uphold the licensing objectives and respectfully request that the committee seriously consider the revocation of this premises licence.



Have you made an application for review relating to the premises before

If yes please state the date of that application

**If you have made representations before relating to the premises please state what they were and when you made them.**

**Lincolnshire Police have never made an application regarding this particular premises, but have taken two other premises to review where Mr Kalamohan has been the Premises Licence Holder (detailed in report above).**

Please tick ✓

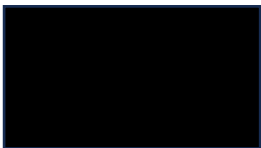
yes

- I have sent copies of this form and enclosures to the responsible authorities and the premises licence holder or club holding the club premises certificate, as appropriate
- I understand that if I do not comply with the above requirements my application will be rejected

**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.**

**Part 3 – Signatures** (please read guidance note 4)

**Signature of applicant or applicant's solicitor or other duly authorised agent** (please read guidance note 5). **If signing on behalf of the applicant please state in what capacity.**

Signature  PC 824 BRAITHWAITE  
.....

Date 22/08/25  
.....

Capacity for and on behalf of Chief Constable of Lincolnshire Police  
.....

<b>Contact name (where not previously given) and postal address for correspondence associated with this application</b> (please read guidance note 6)	
<b>Post town</b>	<b>Post Code</b>
<b>Telephone number (if any)</b>	
<b>If you would prefer us to correspond with you using an e-mail address your e-mail address (optional)</b>	

**Notes for Guidance**

1. A responsible authority includes the local police, fire and rescue authority and other statutory bodies which exercise specific functions in the local area.
2. The ground(s) for review must be based on one of the licensing objectives.
3. Please list any additional information or details for example dates of problems which are included in the grounds for review if available.
4. The application form must be signed.
5. An applicant's agent (for example solicitor) may sign the form on their behalf provided that they have actual authority to do so.

6. This is the address which we shall use to correspond with you about this application.

**Application for the review of a premises licence or club premises certificate under the  
Licensing Act 2003**

**PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST**

Before completing this form please read the guidance notes at the end of the form.  
If you are completing this form by hand please write legibly in block capitals. In all cases ensure  
that your answers are inside the boxes and written in black ink. Use additional sheets if necessary.  
You may wish to keep a copy of the completed form for your records.

**I** Paul Gibson, Chief Constable of Lincolnshire Police

*(Insert name of applicant)*

**apply for the review of a premises licence under section 51 / apply for the review of a club  
premises certificate under section 87 of the Licensing Act 2003 for the premises described in  
Part 1 below (delete as applicable)**

**Part 1 – Premises or club premises details**

<b>Postal address of premises or, if none, ordnance survey map reference or description</b>  Todays Extra 50 Kesteven Road Stamford	
<b>Post town</b> Lincolnshire	<b>Post code (if known)</b> PE9 1SU

<b>Name of premises licence holder or club holding club premises certificate (if known)</b>  Arumugam Kalamohan
---

<b>Number of premises licence or club premises certificate (if known)</b>  23619
--

**Part 2 - Applicant details**

I am

Please tick ✓ yes

1) an individual, body or business which is not a responsible  
authority (please read guidance note 1, and complete (A)  
or (B) below)

2) a responsible authority (please complete (C) below)



3) a member of the club to which this application relates  
(please complete (A) below)

**(A) DETAILS OF INDIVIDUAL APPLICANT** (fill in as applicable)

Please tick ✓ yes

Mr

Mrs

Miss

Ms

Other title  
(for example, Rev)

**Surname**

**First names**

Please tick ✓ yes

**I am 18 years old or over**

**Current postal  
address if  
different from  
premises  
address**

**Post town**

**Post Code**

**Daytime contact telephone number**

**E-mail address  
(optional)**

**(B) DETAILS OF OTHER APPLICANT**

Name and address

Telephone number (if any)

E-mail address (optional)

**(C) DETAILS OF RESPONSIBLE AUTHORITY APPLICANT**

Lincolnshire Police Alcohol Licensing Deepdale Lane Nettleham Lincoln Lincolnshire LN2 2LT
Telephone number (if any) 101
E-mail address (optional) Countylicensinggroup@lincs.pnn.police.uk

**This application to review relates to the following licensing objective(s)**

- 1) the prevention of crime and disorder
- 2) public safety
- 3) the prevention of public nuisance
- 4) the protection of children from harm

Please tick one or more boxes ✓  
X

**Please state the ground(s) for review** (please read guidance note 2)

This review application relates to a premises which operates as a general convenience store offering food and drink to the local community. It has been granted a Premises Licence 23619 by South Kesteven District Council.

The current premises licence holder and designated premises supervisor is Arumugam Kalamohan.

The licence authorises the sale of alcohol and opening hours between 06:00 to 00:00 Monday to Sunday.

Lincolnshire Police have obtained evidence which indicates that the management of this premises has been operating it in such a manner that amounts to criminal activity and thus undermines the licencing objective of the prevention of crime and disorder. There is also clear evidence of non-compliance with the conditions set out on the premises licence.

In relation to this review application the following guidance issued under Section 182 of the Licensing Act 2003 has been considered:

**Revised Guidance issued under Section 182 of the Licensing Act 2003**

*Section 2.1 states licensing authorities should look to the Police as the main source of advice on crime and disorder.*

*Section 10.29 states in addition, every premises licence that authorises the sale of alcohol must require that every supply of alcohol under the premises licence must be made or authorised by a person who holds a personal licence.*

*Section 10.32 states the following factors should be relevant in considering whether or not an authorisation has been given:*

- the person(s) authorised to sell alcohol at any particular premises should be clearly identified;*
- the authorisation should have specified the acts which may be carried out by the person who is authorised to supply alcohol;*
- there should be an overt act of authorisation, for example, a specific written statement given to the individual who is authorised to supply alcohol; and*
- there should be in place sensible arrangements for the personal licence holder to monitor the activity that they have authorised on a reasonably regular basis.*

*Section 10.33 states it is strongly recommended that personal licence holders give specific written authorisations to individuals whom they are authorising to retail alcohol. A single written authorisation would be sufficient to cover multiple sales over an unlimited period. This would assist personal licence holders in demonstrating due diligence should issues arise with enforcement authorities; and would protect employees if they themselves are challenged in respect of their authority to sell alcohol.*

*Section 10.35 states it must be remembered that while the designated premises supervisor or a personal licence holder may authorise other individuals to sell alcohol in their absence, they are responsible for any sales that may be made. Similarly, the premises licence holder remains responsible for ensuring that licensing law and licence conditions are observed at the premises.*

All of the section 11 guidance is based on reviews:

*Section 11.23 states where the premises are found to be trading irresponsibly, the licensing authority should not hesitate, where appropriate to do so, to take tough action to tackle the problems at the premises.*

*Section 11.24 states a number of reviews may arise in connection with crime that is not directly connected with licensable activities.*

*Section 11.25 states that in any case, it is for the licensing authority to determine whether the problems associated with the alleged crimes are taking place on the premises and affecting the promotion of the licensing objectives.*

*Section 11.26 states that where the licensing authority is conducting a review on the grounds that the premises have been used for criminal purposes, it is solely to determine what steps should be taken in connection with the premises licence, for the promotion of the crime prevention objective. The licensing authority's duty is to take steps with a view to the promotion of the licensing objectives and the prevention of illegal working in the interests of the wider community and not those of the individual licence holder.*

*Section 11.27 states that there is certain criminal activity that may arise in connection with licensed premises which should be treated particularly seriously. These are the use of licensed premises;*

*- for employing a person who is disqualified from that work by reason of their immigration status in the UK.*

*Section 11.28 states it is envisaged that licensing authorities, the police, the Home Office (Immigration Enforcement) and other law enforcement agencies, which are responsible authorities, will use the review procedures effectively to deter such activities and crime. Where reviews arise and the licensing authority determines that the crime prevention objective is being undermined through the premises being used to further crimes, it is expected that revocation of the licence – even in the first instance – should be seriously considered.*



**South Kesteven District Council statement of licensing policy (2021 – 2026)** also raises the following points that are deemed relevant to this application:

*1.17 In undertaking its licensing function, the Licensing Authority is also bound by other legislation including, but not exclusively:*

- *Section 17 of the Crime and Disorder Act 1998 – which imposes a duty on every Local Authority to do all that it reasonably can to prevent crime and disorder in its decision-making process.*

*4.1 Each of the four licensing objectives is of equal importance. The Licensing Authority considers the effective and responsible management of the premises and the instruction, training and supervision of staff and the adoption of best practice to be amongst the most essential control measures for the achievement of the licensing objectives.*

#### *4.3 The Prevention of Crime and Disorder*

*In accordance with the Guidance, Police views on matters relating to crime and disorder will be given considerable weight. There are many steps an applicant may make to prevent crime and disorder. The Licensing Authority will look to the Police for the main source of advice on these matters. (those relevant to this application are below)*

- *Provision of CCTV in and around the premises.*

### **Crime and Disorder Act 1998 Section 17:**

*Duty to consider crime and disorder implications.*

*(1) Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent,*

*(a) crime and disorder in its area (including anti-social and other behaviour adversely affecting*

*the local environment); and*

*(b) the misuse of drugs, alcohol and other substances in its area, and*

*(c) re-offending in its area*

*(2) This section applies to each of the following—*

*.a local authority .....*

**Please provide as much information as possible to support the application** (please read guidance note 3)

This premises was previously reviewed back in 2020 and the premises licence holder at that time was Mr Kalamohan. The review was initiated by Lincolnshire Police (*see appendix A for police review application*) following a visit made by Police and Immigration in March 2020. During this visit, an illegal worker was encountered, in addition to two persons located in the staff accommodation area with no right to work who were believed to be workers at the premises. Various non-compliance issues were also highlighted.

A hearing was held, and the decision made by the Committee was to modify the licence to include more stringent conditions relating to staff training and refresher training, checks and recording of employees right to work (*see appendix B for hearing minutes and decision notice*).

The Home Office have recently confirmed that the £10,000 penalty issued in relation to the illegal working discovered in 2020 remains outstanding and has since been referred to a third-party debt collection agency. Although this penalty was not issued to Mr Kalamohan personally, the business was still under his control at the time.

It is also important to note that in October 2018, another of Mr Kalamohan's premises, Today's Express, Market Place, Grantham faced a review hearing due to illegal working, selling alcohol below the mandatory price, and non-compliance. This was again initiated by Lincolnshire Police (*see appendix C for police review application*), and the Committee made the decision to revoke this premises licence (*see appendix D for hearing notes and decision notice*).

Due to persistent and serious concerns about Mr Kalamohan's ability to manage licensed premises, Lincolnshire Police feel that this review is necessary. Mr Kalamohan also has control of two other convenience stores that each hold a premises licence, Today's Local 10 Red Lion Square, Stamford and Today's 2 Horsemarket Caistor, both of these premises are also currently subject to licence reviews instigated by Lincolnshire Police.

Full details of the concerns Lincolnshire Police have in relation to the Red Lion Square premises can be found in the review application submitted alongside this review (*see appendix M*).

The review application submitted by Lincolnshire Police for 2 Horsemarket, Caistor, in summary provides evidence of two separate occasions where police have encountered illegal working alongside non-compliance issues (*see appendix E for review application*).

Lincolnshire Police find themselves in a position where they can demonstrate Mr Kalamohan cannot operate responsibly under the Licensing Act 2003, the licensing objective and associated legislation.

This premises with licence 23619 under review, has been visited by police on three separate occasions over the last two years, and consistent issues have been encountered during every visit. During this period Mr Kalamohan has always held the position of designated premises supervisor (DPS). These visits are summarised below:

### **3<sup>rd</sup> October 2023**

A Police Licensing inspection was carried out in company with Immigration. An illegal worker was encountered (*see appendix L for Immigration interview with worker*), coupled with non-compliance of conditions including CCTV, DPS authority, right to work documentation and staff training (*see appendix F for Pc Braithwaite's statement and appendix G for images taken and exhibited as KB01*).

Immigration officers referred this case to the Home Office Civil Penalty Compliance Team for a civil penalty to be issued, however no further action was taken.

Whilst Lincolnshire Police acknowledge no further action was taken by the Home Office on this occasion, it was certainly confirmed at the time that the worker encountered was working without the correct right to work entitlement, which does amount to a crime. Although the threshold for a penalty was not met on this occasion, it does not alter the circumstances, and in conjunction with the confirmed illegal workers discovered at Mr Kalamohan's other shops in the past, we feel this should be seen as more than just merely coincidental.

### **7<sup>th</sup> November 2024**

A Police Licensing inspection was carried out and various non-compliance identified of conditions relating to CCTV, DPS authority, incident and refusals recording, signage, right to work documentation and staff training was discovered (*see appendix F for Pc Braithwaite's statement and appendix H for images taken and exhibited as KB02*).

An email was sent to Mr Kalamohan following this visit requesting urgent action was taken to rectify the issues, however in his response he did not acknowledge or provide any comment regarding the concerns, despite being given the warning that proceedings under the Licensing Act 2003 would be considered should the premises be found in breach its conditions again. (*see appendix I for emails*).

### **17<sup>th</sup> June 2025**

A Police Licensing inspection was carried out and once again non-compliance with conditions relating to CCTV, DPS authority, incident and refusals recording, location of spirits, shop signage, right to work documentation and staff training were discovered.

Concerns were also noted in respect of the sale of equipment used to prepare and smoke illegal drugs, along with the sale of 'Poppers' a product commonly used as a recreation drug. (*see appendix J for Pc Braithwaite's statement and appendix K for images taken as KB03*).

The multiple occasions where non-compliance of both the annex 2 and 3 conditions of the licence have been discovered during inspections, amount to s.136 offences under the Licensing Act 2004 – unauthorised licensable activity.

During the visits carried out in 2023 and 2025, quantities of non-priced alcohol were witnessed which is an offence under the Price Marking Order Act 2004 (*see appendices KB/01 and 03 for images taken*).

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 must carry out various checks to ensure that their staff are legally allowed to work.

Where an employer pays wages to illegal workers off record with no tax or national insurance deductions which are then deliberately omitted from an employers End of Tax Year P35 returns to HMRC, the employer may be dealt with by means of the Fraud Act 2006. Similarly, HMRC may take action as a civil proceedings case and raise a tax debt against the business.

Illegal workers are more than likely poorly paid for the hours they are required to work and are not subject to the benefit of a minimum wage or restricted hours as prescribed in law. Nor are they afforded the benefit of the protections offered by UK employment legislation and are therefore often exploited.

Lincolnshire has led the way with how illegal working within licenced premises and its impact on how the crime prevention objective should be viewed. The stated case of *East Lindsey District Council v Abu Hanif* in 2016 involved an illegal worker in a licenced premises in Lincolnshire in April 2014, where a civil penalty was later issued by immigration. The premises licence was reviewed and revoked, an appeal followed which was successful, based on the argument that a civil penalty was not a prosecution and so did not concern the crime prevention objective. East Lindsey District Council then appealed that decision by way of a case stated, arguing that it was not necessary for a crime to have been reported, prosecuted, or established in a court of law in order for the crime prevention objective to be engaged. That the licensing objectives were prospective and were concerned with the avoidance of harm in the future. Mr Justice Jay upheld the councils appeal, citing defrauding the revenue and exploitation of vulnerable individuals by not paying minimum wage as evidence of the commission of criminal offences, and the fact that the employee could not provide the required paperwork as clear inference that Mr Hanif well knew that he was employing an illegal worker.

Lincolnshire Police deem the management of this premises to be unacceptable and feel that Mr Kalamohan has been given sufficient and appropriate warnings/advice regarding all three shops which now face review.

Lincolnshire Police cannot identify any other conditions that could be imposed to prevent the highlighted issues from recurring.

It is a major concern that Mr Kalamohan, having narrowly avoided revocation of this licence in 2020, has been completely non-compliant with the annex 3 conditions imposed by the Committee on all occasions police have inspected the premises since the hearing. We would argue that this cannot simply be a case of lack of understanding, more likely blatant disregard on the part of Mr Kalamohan.

Lincolnshire Police have no confidence in the ability of Mr Kalamohan to uphold the licensing objectives and respectfully request that the committee seriously consider the revocation of this premises licence.

Have you made an application for review relating to the premises before

If yes please state the date of that application

**If you have made representations before relating to the premises please state what they were and when you made them.**

**Lincolnshire Police applied to have this premises reviewed in 2020 as described above, and the Committee made the decision to modify licence conditions.**

Please tick ✓

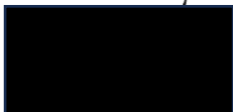
yes

- I have sent copies of this form and enclosures to the responsible authorities and the premises licence holder or club holding the club premises certificate, as appropriate
- I understand that if I do not comply with the above requirements my application will be rejected

**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.**

**Part 3 – Signatures** (please read guidance note 4)

**Signature of applicant or applicant's solicitor or other duly authorised agent** (please read guidance note 5). **If signing on behalf of the applicant please state in what capacity.**

Signature  PC 824 BRAITHWAITE  
.....

Date 22/08/2025  
.....

Capacity for and on behalf of Chief Constable of Lincolnshire Police  
.....

<b>Contact name (where not previously given) and postal address for correspondence associated with this application</b> (please read guidance note 6)	
<b>Post town</b>	<b>Post Code</b>
<b>Telephone number (if any)</b>	
<b>If you would prefer us to correspond with you using an e-mail address your e-mail address (optional)</b>	

**Notes for Guidance**

1. A responsible authority includes the local police, fire and rescue authority and other statutory bodies which exercise specific functions in the local area.
2. The ground(s) for review must be based on one of the licensing objectives.
3. Please list any additional information or details for example dates of problems which are included in the grounds for review if available.
4. The application form must be signed.
5. An applicant's agent (for example solicitor) may sign the form on their behalf provided that they have actual authority to do so.

6. This is the address which we shall use to correspond with you about this application.



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

URN

Statement of:  
Rebeka CaseyAge if under  
18:**018**

(if over 18 insert 'over 18')

Occupation: Police Constable 1299

This statement (consisting of 2 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it, anything which I know to be false, or do not believe to be true.

Signature:

Date 16.09.25

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

I am the above named person employed as a Police Alcohol Licensing Officer within Lincolnshire Police.

On Friday 12<sup>th</sup> September 2025 at approximately 09:45 hours I attended Today's 2 Horsemarket, Caistor alongside Sgt Adams. The purpose of the visit was to return a USB stick containing CCTV to the owner of the premises.

Upon entering the shop, I saw a lone female working behind the counter who had just finished serving a customer. I introduced myself showing identification (warrant card) and asked if there was anyone else in the shop. The female did not seem to understand what I was saying, and it quickly became apparent that she spoke little to no English. Sgt Adams checked the rest of the shop and could not find any other staff present. I asked the female if she had any identification but again, she was not able to understand. The female did say "JUST TRAINING, JUST TRAINING" but wasn't able to answer when I asked who was training her. I then asked if there was an incident/visitor book I could write in, but the female did not appear to understand. I was aware from previous visits that the premises has a blue folder with all licensing related documents in and I could see this folder on the staff side of the counter top adjacent to the window, I pointed the folder out and the female passed it to me.

Page 1 of 2

Signature:

Force source not

Signature witnessed by:

Page 133

URN				
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Statement of: **PC 1299 CASEY**

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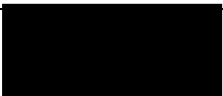
Subsequently the female made a call on her mobile phone to her husband. From the callers photo ID I could see that this was a male that I had previously met at the shop. I spoke to the male and asked if he could get his wife to show me some ID which she did, I also asked him to explain that I was purely at the shop to return some property which I'd like someone to sign for.

The female did provide ID and I checked her status with Home Office Immigration who confirmed that she was a Sri Lankan national with leave to remain as a dependant and had the right to work until 5<sup>th</sup> June 2026.

I then checked the incident book and training logs and found that the female was listed on the DPS authority to sell alcohol (dated 02.09.25) and alcohol training log (dated 16.06.25). Both documents were within the blue folder that I had pointed out to the female earlier.

Even though this female was listed on the DPS authority and training logs I had concerns that she was not able to converse to a basic level in English and in particular was worried about her ability to fulfil the Challenge 25 policy and any necessary refusals of alcohol.

The females husband arrived quickly and took possession of the USB stick. I populated the incident book to record my visit for the licence holders' records before leaving the shop.

Signature:		Signature witnessed by:	
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