

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 Doug Love, Lead Practitioner, Trading Standards
(Insert name of applicant)

apply for the review of a premises licence under section 51 of the Licensing Act 2003, for the premises described in Part 1, below.

Part 1 – Premises or club premises details

Postal address of premises or, if none, ordnance survey map reference or description:

Wine Rack (currently t/a Wine Shop)
27 Richmond Way

Post town:

London

Post code:

W14 0AS

Name of premises licence holder or club holding club premises certificate:

Jagmon Singh

Number of premises licence or club premises certificate:

2015/00333/LAPR

Part 2 - Applicant details

I am

Please tick ✓ yes

1) an interested party (please complete (A) or (B) below)

a) a person living in the vicinity of the premises

b) a body representing persons living in the vicinity of the premises

c) a person involved in business in the vicinity of the premises

d) a body representing persons involved in business in the vicinity of the premises

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

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

(C) DETAILS OF RESPONSIBLE AUTHORITY APPLICANT

Name and address

Doug Love
Lead Practitioner, Trading Standards
Hammersmith Town Hall
King Street
London
W6 9JU

Telephone number: **07771 806 923**E-mail: doug.love@lbfh.gov.uk

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

Please tick one or more
boxes

the prevention of crime and disorder
public safety
the prevention of public nuisance
the protection of children from harm

Please state the ground(s) for review (please read guidance note 1)

This review relates to the alleged failure of the premise licensee to promote the licensing objective relating to the prevention of crime and disorder. Full details of the facts and allegations against the business follows.

The business

Wine Shop is a small off-licence, believed to be operated by Emin Wines Ltd., a company of which premises licence holder, Jagmon Singh, is one of two directors. The company has operated for over 11 years. Mr Singh has held the premises licence since Spring 2015. Saran Singh, the other company director, is the Designated Premises Supervisor.

Events prompting this application

23/06/25: Trading Standards received an anonymous intel report claiming that Wine Shop was selling hand-rolling tobacco in branded packaging, which had made consumers ill. Branded packaging is an indication that hand-rolling tobacco is non-duty paid and illegal to sell in the UK ('plain' packaging has been required since 2015); immediate ill-health being caused by tobacco is a sign that the product may be counterfeit and adulterated. No evidence was supplied – the intel was merely an allegation.

25/06/25: Bill Masini, then an authorised officer for both LBHF Trading Standards and Licensing teams, and I visited the premises.

No illicit hand-rolling tobacco was found, but cigars with German language warnings – assumed also to be non-duty paid - were displayed for sale and seized. Tobacco products that do not carry the correct health warnings and/or on which duty has not been paid are illegal to sell in the UK

High strength beers at very low prices – one at less than duty + VAT - were observed. These included the following brands:

- Karpackie (9% abv), on which VAT & duty of £1.60 was payable, was on sale at £1.50
- Kestral Super Premium Lager (9% abv) - £1.60 VAT & duty payable - on sale at £1.80
- Skol Super (8% abv) - £1.05 VAT & duty payable - on sale at £2.00
- Perla Mocna (7.1% abv) - £0.93 VAT & duty payable - on sale at £1.50

It is a breach of a mandatory licence condition to sell alcohol at less than the cost of duty and VAT.

I took some photographs of the beers during the visit, which I reproduce in Appendix A.

June – September 2025: I corresponded with Jagmon Singh and Saran Singh requesting invoices be provided for these beers, which all appeared to have a long use-by date on them, as I thought they were on sale very cheaply and I know that high-strength beers – especially those stronger than 8.5% abv, which have a much higher duty rate, are regularly smuggled product sold on the black market.

As a result, I reported the infringement to the Trading Standards Manager in September. I wrote with to Mr Singh and the company to outline her decision later the same month. I did not receive a response to this letter.

I have replicated all relevant contact in the Appendix B to this report.

Comments on Appendix B

- *E-mail on page 1.* I requested the 'two most recent invoices' for the suspect beers. The reason for this is because I believe that some dishonest businesses ensure that they have a 'genuine' invoice for goods they stock, that they then use to justify the future presence of that product in the shop.

- *Email and invoice on page 2.* Only one invoice was provided, showing that two trays (ie. 48 cans) of each suspect beer was purchased twelve weeks prior to me seeing them in the shop. The price/can paid for each brand were as follows:

Karpackie @ £1.85 (35p more than the selling price I saw)
Kestrel Super @ £1.90 (10p more)
Skol Super @ £1.95 (5p less)
Perla Mocna @ £1.55 (5p more)

I do not regard the explanation provided for the low prices credible.

- *E-mails on page 3.* Despite explaining my incredulity and inviting the business to clarify the circumstances surrounding the prices. I heard nothing further from the business.
- *Letter on pages 4 & 5* This letter followed the infringement being reported to the Trading Standards manager and (in a final attempt to get the business to engage properly) afforded the opportunity to avoid formal action by making 'representations'. Nothing was heard in response.

13/12/25: Shortly before submitting this application I called into the shop at a weekend. The purpose was two-fold. Firstly, I wanted to see what beers were for sale. The only ones of the suspect brands still available was the Kestrel Super, priced now at £2.20 per can – more the price I would have expected. This does give a little credence to the businesses claim that the beers were poor sellers – although these beers are very popular in other off licences.

The second hope was that either Jagmon or Saran Singh would be in the shop - there had always only been an employee when I visited during a weekday. The former was there and it was the first time we had met face-to-face. His spoken English was very good, but he said that he had not really understood my later emails, after he had supplied the invoice. I asked why he hadn't contacted me to ask me to explain further, something I would have been pleased to do, but he didn't really answer this. I am hoping that now we have met, the engagement will improve.

Recommendations

Had the licensee engaged effectively with Trading Standards, it is unlikely that this matter would have reached the stage where this review application became necessary, and failing to do so reflects poorly on his management of the premises.

Even had he responded to the letter dated 24/09/25 (*pages 4 & 5 of Appendix B*) – a letter which recommended he sought independent legal advice and offered him the opportunity to discuss potential representations before submitting them – the review would most likely have been avoided.

It is the belief of Trading Standards that at least some of the beer regarded as suspect must have been purchased from a source other than an approved Alcohol Wholesalers' Registration Scheme (AWRS) member. It is a legal requirement for retailers to purchase alcohol only from AWRS members. It seems certain that the beer was sourced elsewhere, at a price low enough to make the selling prices seen in the June visit possible. Any beer purchased in this manner could not possibly have been legal to sell: Trading Standards believe it must have been non-UK duty & VAT paid.

I request that the Licensing Sub-Committee to add the following conditions to the licence and to make clear to Mr Singh, if they agree, that it is important for licensees to engage with Responsible Authorities (particularly those who are engaged with law enforcement) and that failing to comply with the condition in future is likely to result in stronger action and may lead to his licence being revoked.

If the Sub-Committee agrees that illegal goods were purchased irresponsibly, it would also be legitimate, in my opinion, to consider whether the licence should be suspended for a period to allow a review of purchasing procedures, staff training and of current stock, or revoked on the basis that any responsible licensee would have not purchased illegal goods in the first place.

Conditions requested to be added

- The premises licence holder shall ensure a response to written enquiries from any responsible authorities is made within five working days.
- Invoices (or copies) for all alcoholic goods on the premises will be made available to the officers from the council, police or HMRC upon request.
- The Licence Holder shall ensure any instance of a caller to the shop attempting to sell alcohol or tobacco products are reported to Trading Standards within 24 hours.

There are few non-mandatory conditions on the premises licence at the moment. The Licensing Sub-Committee may also consider 'updating' the licence by adding other relevant conditions, relating, for instance, to CCTV and training.

Have you made an application for review relating to this premises before No

If yes please state the date of that application

Day Month Year

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

N/A

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, LIABLE ON CONVICTION TO A FINE UP TO LEVEL 5 ON THE STANDARD SCALE, UNDER SECTION 158 OF THE LICENSING ACT 2003 TO MAKE A FALSE STATEMENT IN OR IN CONNECTION WITH THIS APPLICATION

Part 3 – Signatures (please read guidance note 3)

Signature of applicant or applicant's solicitor or other duly authorised agent (See guidance note 4). If signing on behalf of the applicant, please state in what capacity

Signature:



Date: 16/12/25

Capacity: Lead Practitioner, Trading Standards

Contact name (where not previously given) and postal address for correspondence associated with this application (please read guidance note 5)

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)

APPENDIX A

Photographs from visit to Wine Shop on 25/06/25



'Suspect' beers and price indication from beer fridges



Use by date of February 2026 on base of Karpackie can

APPENDIX B

Correspondence with Jagmon and Saran Singh

Visit to Wine Rack, yesterday



Love Doug: H&F

To

Cc

Masini Bill: H&F

Retention Policy: LBHF Permanently Delete (6 years)



Thu 26/06/2025 13:04

Expires: Expiration Suspended (25/06/2031)

Dear Saran & Jagmon,

The Environmental Protection (Single-use Vapes) (England) Regulations 2024
The Tobacco and Related Products Regulations 2016
Digital Markets, Competition and Consumers Act 2024

I am the Trading Standards officer who accompanied Bill Masini, who you spoke with on the phone during the visit, to Wine Rack at 27 Richmond Way, yesterday. I understand that you co-own the shop.

The visit followed anonymous intel, alleging that the business had provided some hand-rolling tobacco in non-plain packaging. There was nothing found to support this intel, but there were some issues identified.

- Two trays of **single-use vapes** were found in the store area. These are now illegal to sell, but I appreciate that there were none on display and I have no evidence that you were intending to sell them. As long as you are happy for me to dispose of them for you – they are no good to you, as I understand manufacturers and wholesalers have been clear they will not accept returns – I do not propose to take further action on this matter.
- **Cigars with German language health warnings** were seized as they are illegal to sell in the UK.
 - If they are sold as full packs) they would require English language warnings to be legal.
 - If they are non-UK duty paid, they cannot legally be sold (if duty has been paid, please provide documentary evidence).
 - I believe they may have been sold separately (due to the opened packs from which some individual cigars had been removed), but this is only legal if the appropriate English-language warnings are on the wrapping of each item, as they are on the cigars *intended* to be sold individually.

Please ensure only tobacco products with the correct, English language warnings are sold, or in possession for supply in future. If further offences are discovered, formal enforcement action may be taken.

Again, I do not intend to take further action on this, apart from this warning, assuming you are willing to allow me to dispose of the items. However, I'm always happy to engage further if you believe no offence has been committed, or require further information.

- **Suspiciously cheap beers.** Please provide copies of your two most recent invoices for the following beers:

- Karpaklie – on sale for £1.50 per can
- Perla Mocna – on sale for £1.50 per can
- Kestrel Super Premium lager – on sale for £1.80 per can
- Skol Super – on sale at £2.00 per can

These prices are sufficiently low for me to suspect they are non-UK duty paid. If you are selling non-UK duty paid alcohol, you will be committing an offence under the DMCC Act.

Please provide the invoice by the end of next week. (A photograph or a scan will be sufficient, at least initially). I will then be able to assess whether further action is appropriate.

- In passing, some reminders:

- no tobacco items should be generally visible to consumers: please move the cigars that were visible from the customer side of the counter and repair the gantry, so that no cigarettes are visible through the gaps in the 'curtain';
- don't forget to contact Bill, as discussed, so that he can be satisfied that you are complying with the Licensing Act 2003. Both Bill and I are officers who would prefer to assist business to comply with the law, rather than have to deal with non-compliances: please engage with us to allow an informal outcome to any non-compliances.

Kind regards

Doug

Doug Love
Lead Practitioner, Trading Standards
Hammersmith & Fulham Council
Hammersmith Town Hall, W6 9JU

07771 806 923

Wine rack .



Retention Policy LBHF Permanently Delete (6 years)

ⓘ This sender [REDACTED] from outside your organization.

ⓘ You forwarded this message on 30/06/2025 16:43.

Expires: Expiration Suspended (29/06/2031)

Mon 30/06/2025 16:09

You don't often get email from eminsingh@yahoo.co.uk. [Learn why this is important](#)

From Saran / jagmon

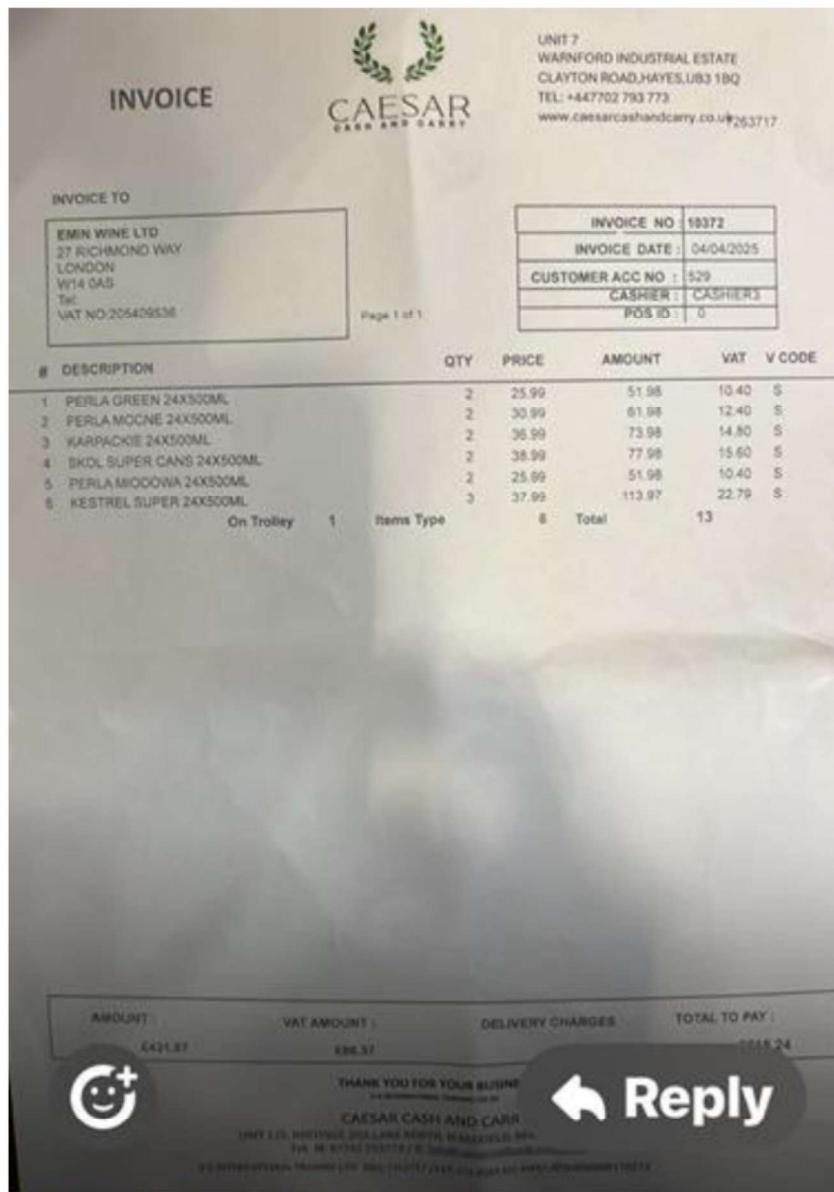
Wine rack.

27 richmond way

Kensington

W140AS

Hi dear sir i am sending you invoice for the beers you asked for
And would like to say that we wanted to try some of them and see how it goes but the demand is not as i thought would be
And i wanted to clear them that's why we have that prices
But now i have changed all prices all updated
And regarding the vapes and cigars i would appreciate if you dispose off them.
If anything else would you like to discuss or want please contact me i will cooperate completely.



Thank you very much.■

[Sent from Yahoo Mail for iPhone](#)

RE: Wine rack .

 Love Doug: H&F
To Emin Singh
Cc Masini Bill: H&F
Retention Policy LBHF Permanently Delete (6 years)
 You replied to this message on 17/07/2025 09:01.

     Mon 30/06/2025 20:23

Expires: Expiration Suspended (29/06/2031)

Dear Saran / Jagmon.

Thank you for confirming that you are happy for me to dispose of the vapes and the cigars.

I have to admit to finding your explanation about the beers puzzling.

- You say that beers (which I know to have a demand amongst certain drinkers) did not sell. Does this mean that this was the first time you stocked them? (Presumably it is, as I asked for the **two** invoices and only one was provided?).
- You seem to have bought a lot of different super-strength beers at once. Is this not odd, if you were trying them for the first time?
- In well under three months since you bought them, you have reduced the price of the beers to below cost price (Karpackie, Kestrel & Perla Mocna) as you wanted to 'clear them' and printed out new price-edge tickets, instead of describing them as 'reduced' to clear stock. The Karpackie had been 'reduced' to a price at which it is illegal to sell. It is a mandatory licence condition that no alcohol can be sold for the less than the price of Duty and VAT - £1.60 per can for Karpackie. If I were to check the EPOS pricing history in the shop, this change of price would be shown, I trust?
- If they do not sell, I trust I will see no super-strength beers in your shop again? It wouldn't be good to re-stock items that you have to sell at a loss to clear them.

Before I decide what to do about this matter, do you want to clarify or amend anything in your e-mail?

Kind regards,

Doug

RE: Wine rack .

 Love Doug: H&F
To 'Emin Singh'
Cc Masini Bill: H&F
Retention Policy LBHF Permanently Delete (6 years)
 You replied to this message on 28/08/2025 12:31.

     Thu 17/07/2025 09:02

Expires: Expiration Suspended (16/07/2031)

Dear Saran / Jagmon,

I note I have had no response to my email, below. Could you respond with some urgency.

Thank you.

Doug

Single-use vapes conclusion / Notice of formal investigation

 Love Doug: H&F
To Emin Singh
Cc Masini Bill: H&F
Retention Policy LBHF Permanently Delete (6 years)
 Wine Rack.docx
69 KB

     Thu 28/08/2025 12:31

Expires: Expiration Suspended (27/08/2031)

Dear Saran / Jagmon.

Further to my e-mails, below, the last two of which remain unanswered, please note the following:

No further action will be taken regarding the single-use vapes removed, apart from sending the attached letter. Thank you for agreeing to surrender them.

Regarding the tobacco products seized and the alcohol queried, I'm afraid that I will have to report this matter, with the recommendation of formal enforcement action. It is possible that my manager will prosecute the business, or ask me to review your premises licence. I was hoping for a more informal resolution to this matter, but your failure to engage with me by responding properly to my enquiries has made this impossible.

I do not intend to invite you into an interview, as I have sufficient evidence to report the offences and / or to make a review application, as directed by the TS Manager. However, if you wish to make any written comments about the allegation, please do so by the 8th September. I am on leave after today until that date and I will be reporting the matter soon after I return.

For clarity, the allegations are the following:

- That you had for sale tobacco products which were not labelled in accordance with **Part 2 of The Tobacco and Related Products Regulations 2016** and are evidence of an offence under **Regulation 48**;
- That the tobacco products and some of the beers I asked about were also non-UK duty paid. Displaying them is, I believe, a breach of the **Digital Markets, Competition and Consumers Act 2024, Schedule 20, paragraph 10** and an offence under **section 237 (7)** of that Act.

I will also include any offences under the **Licensing Act 2003**, if requested to, by my Licensing Team colleague, Bill (cc'd), who was with me when I visited.

Finally, thank you for the information provided about a neighbouring business. I can confirm that the intel has been followed up – without, of course, any reference to information having been supplied – and that a small amount of illicit tobacco was removed from the owners. A colleague is investigating and appropriate enforcement action will result, once the matter is reported to the TS Manager.

Kind regards,

Doug

(Nb: the attached letter was a warning /advice letter solely related to the seized sing-use vapes).

London Borough of Hammersmith & Fulham

Trading Standards

Hammersmith Town Hall, W6 9JU

Tel: 07771 806 923

Email: doug.love@lbhf.gov.uk

Web: www.lbhf.gov.uk



Jagmon & Saran Singh
Emin Wine Ltd t/a
Wine Shop
27 Richmond Way
London
W14 0AS

Date: 24/09/25

By hand and e-mail to eminsingh@yahoo.co.uk

Dear Sirs,

Licensing Act 2003
Digital Markets, Competition and Consumers Act 2024 (DMCCA)

I am writing further to the identification of cheap beer during a visit on 16/07/25 by Bill Masini, and my unanswered e-mails since then, most recently my e-mail of 28/08/25.

Some of the seized beer was for sale at a price cheaper than the total of duty and VAT and is evidence of a breach of a mandatory licence condition and an offence under section 136 (1) of the Licensing Act 2003 – an offence for which Jagmon, as the premises licensee can be liable.

It is also alleged that the beer is illegal to sell, as it is non-UK duty paid, and possession for supply is evidence of a breach of the Digital Markets, Competition and Consumers Act 2024, Schedule 20, paragraph 10 and an offence under section 237 (7) of that Act. The company and, potentially, its directors (by section 239 (6)) can be liable for this offence.

I have now reported the matter to my manager. She agrees with my recommendation that your failure to engage leaves us with no option but to take formal action, in line with our enforcement policy.

- She has asked me to prepare a prosecution file against the company and you as individuals. Should the matter result in a conviction, we will ask the Court to award our full costs against you, in addition to whatever penalty they issue.
- She has also asked that I prepare an application to review the premises licence, so that Councillors are able to take a view of the alleged failure to observe the "prevention of crime..." licensing objective.

However, there is pressure on all enforcement teams to use resources effectively. Taking prosecutions and submitting review applications uses a lot of officer time and we are aware of the pressure on the Court system, which has large backlogs that are unlikely to lessen in the short term.

For these reasons, before I do these things, we will allow you a short period in which to make representations to us about these decisions (ie. submit arguments against the need for a prosecution and/or review application and offer an acceptable alternative). We will consider any representations you make and if we think an appropriate solution is being offered, we will not proceed with the proposed actions.

- **IT IS ENTIRELY YOUR CHOICE WHETHER TO MAKE REPRESENTATIONS.**
- **I STRONGLY RECOMMEND THAT YOU SEEK INDEPENDENT LEGAL ADVICE BEFORE DECIDING WHETHER TO MAKE REPRESENTATIONS.**

- **YOU HAVE ONLY UNTIL WEDNESDAY 15th OCTOBER TO SUBMIT REPRESENTATIONS**

The type of representations you may choose to make are up to you but may include the following.

- Your willingness to sign a (company and/or individual) caution, admitting the offences.
- Your willingness to ~~make a contribution~~ to the costs of the investigation.
- Your willingness to make a minor variation to add appropriate conditions to the premises licence, including: "*The licensee, or another appropriate person from the business, will respond to enquiries from officers of responsible authorities within five working days of the enquiry being made.*"

We believe that if a resolution could be achieved without a prosecution and/or review being necessary, you will benefit - as well as Trading Standards and the Courts - by avoiding the strong likelihood of a conviction that would:

- potentially restrict your opportunity to travel or gain future employment.
- take your time and most likely cause you added stress; and
- be likely to cost you a considerable amount in fines, costs and a victim surcharge, even if you do not have to pay for your own legal advice;
- safeguard the premises licence against potential suspension or revocation.

It is, however, your choice.

If you wish to have a discussion with me before making representations, I will be available up to 8th October, after which I will be away for a few days leave. Representations should be made directly to my manager at marcella.donegal@lbhf.gov.uk (please cc me) or to the address at the top of this letter.

Yours sincerely

Doug Love
H & F Trading Standards