

Camden Licensing Authority  
5 Pancras Square  
London N1C 4AG

Date 9<sup>th</sup> June 2026

**REF No, 135545 - Response to the Transfer Application of a Premises Licence  
Simmons (Kiss) 7 Camden High Street NW1 7JE**

We are writing this response to Pc Malone on behalf of the Metropolitan Police representation objecting to the Transfer Application. Please accept this response as our Skeleton Argument

Firstly, I would like to say but I'm somewhat amazed that such a representation can be submitted and within the public domain, listing alleged allegations of Attempted Murder, Prostitution, Burglary, Antisocial Behaviour, Employing Staff who did not have the Rights to Work, which are all down to Mr Ray. The sole Director of Camden Hospitality Services Ltd.

Which I must set the record straight. None of these allegations have been proven, laying any blame on Mr Kaska. Mr Ray has not been arrested or charged for any of the crimes that PC Malone has submitted within the public domain. Which could have a damaging effect on Mr Ray.

**Attempted Murder**

In reference to the "Attempted Murder" I note that PC Malone has not included in his representation, that the Male (not Mr Ray) who was arrested and charged for "Attempted Murder", was later acquitted of the charges, and the incident was found as "Self Defence".

This male was not directly associated with the premises other than knowing the female member of staff.

Note how the "Attempted Murder" is listed as a "Crime Report", on page 4 of PC Malone's representation. Page 5 of his representation states "Counter Allegation..."

We acknowledge that this incident was a serious crime, and under no circumstance are we attempting belittle this incident. We are attempting to demonstrate that, this incident should not be considered as Mr Ray's involvement.

### **Allegations of Prostitution & Drugs – New Market Ale House**

We agree that a warrant was actioned by Housing Officers and the Neighbourhood Police Team at the Hotel, based on allegations of Drugs and Prostitution at the premises. The representation throws this out there, without providing any further information, such as outcome.

This was based on allegations from Residents living on Agar Grove. The residents of the hotel, were, short- and long-term residents. The Residents who made these allegations possibly did not want this type of premises in the vicinity.

The outcome of the execution of the warrant, Officers were shown around the premises and left alone to look around. The search found nothing to report. No evidence or anything to support the allegations of Drugs or Prostitution activities taking place at the premises. Mr Ray informed me that that at the time of the execution of the warrant, Police Officers in attendance stated that they didn't think that this was the right premises.

PC Malone also states that the premises was operating without a Designated Premises Supervisor. The fact of the matter was, the Landlord was the Designated Premises Supervisor and Licence Holder, and therefore, my client was operating the premises under the Landlord permission granted by the licence.

### **Burglary –**

There has been no investigation into this allegation. Just a Crime Report.

Mr Ray, spoke with the tenant on multiple occasions. The tenant was suffering with mental health issues. My client would receive messages from the tenant stating that she was being followed. My client would regularly go out of his way to reassure her that she was safe and directed her to seek professional assistance. Screenshots of WhatsApp conversations with the tenant **(Attached as Ref KR/1)**.

My client believed that this was all over, until the Police approached the Landlord, and provided with these false allegations, which resulted the Landlord terminating my lease. Which resulted in a loss of £150k.

### **The Camden 61-65 Crowndale Road**

No comment regarding this premises at this present time. As PC Malone has stated, there is a second Review application currently in process.

## **Kiss 7 Camden High Street**

On page 5 of PC Malone's representation, he states that the venue has been employing people who did not have the Rights to Work in the UK. Following the visit from Immigration and the Police, I served PC Hallam (17<sup>th</sup> January 2025), copies of the employees of concern, their Rights to Work documentation. However, the Police, submitted a Review Application on the grounds relating to Immigration and breaches of Conditions.

At the time of the Hearing, there was very little was mentioned, as I supplied all the relevant documentation to prove that they were entitled to work in the UK. With the Police claiming that they were awaiting a response from Immigration. Immigration Officer did not submit a representation or attending the Hearing.

### **The Transfer Application –**

My client took over the lease recently, and on completion of the lease, Mr Ray submitted the Transfer Application, as required by the Licensing Act 2003. The application has taken immediate effect, which regards the applicant as the holder of the licence unless it is determined that the application is rejected.

Therefore, my client has, on the weekends, conducted licensable activities at the premises, within the prescribed permissions of the licence. The premises is operating in compliance of all the Licensing Conditions in Annex 2 & 3.

He is assisted by a Team of Staff has been trained as per Condition 21 of the licence. Since opening, there has not been issues, or concerns from any of the responsible authorities.

I have attached an email containing document demonstrating compliance, at the premises (Kiss), which includes Training of staff, signage and other etc. These documents are attached as an (email Ref KR/2)

I, Paul Richards, a Licensing Consultant, who has extensive experience of the requirements of the Licensing Act 2003. Working for and with many Licensing Authority within and outside of London. I also act on behalf of Applicants and Licensees submitting and representing them at licensing Hearings. Therefore, I am fully aware of the requirements and measure that a premises must have in place to promote the Licensing Objectives. I will be working with Mr Ray to assist him where and when needed, to operate a well-managed licensed premises.

The Metropolitan Police acting as a Responsible Authority must consider all licensing applications. They are entitled to submit a representation objecting to the granting of an application, predominantly addressing the Licensing Objective “Prevention of Crime and Disorder”.

However, the representation must be factual and evidential, attached to the premises or the individual.

The judgement of DJ(MC) Newton has been referenced, but without substance. This was an avenue that was reviewed, at the time when the Country was coming out of COVID Regulations. Coming out of COVID, there was a high volume of Noise Complaints from residents in relation to licensed premises, which resulted in a number of Review Applications, which resulted in revocation of licences, throughout the country. Kiss the Sky 18-20 Park Road N8, was one of these premises.

I am aware that this response may appear to say not founded, not founded. But this is the position in the instance. The representation submitted objecting to the transfer of the licence, has provided some damaging statements towards my client, without investigation, or providing the outcome of an investigation.

Each application should be determined on its own merit. This is a simple Transfer Application. I do agree, the Licensee/Applicant should be taken into account, based on the Licensing Objective. But information provided to support the representation should be factual.

I believe that this application should be granted, which allow Mr Ray to demonstrate that he can operate a premises abiding by the terms and conditions of the licence. If any person or Responsible Authority, can demonstrate that my client is operating in breach of the Licence Conditions, or not promoting the licensing objectives, then an Review Application should be submitted, and the Licensing Panel can determine the outcome of any such application.

Your Sincerely

*P Richards*

Paul Richards  
Licensing Consultant