

Our ref. STEWS1075967.00001
Your ref.
Please ask for: Jason Stevens



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For the attention of Mr Bayliss
Customer Service Centre
Northamptonshire County Council
John Dryden House
8-10 The Lakes
Northampton
NN4 7YD
By post and fax 01604 838496

08 December 2010

Dear Sir

Re: Application to review the Club Premises Certificate relating to the Eastern District (North) Social Club

We act for the Eastern District (North) Social Club. The Eastern District (North) Social Club holds a Club Premises Certificate that is the subject of a review application brought by the Licensing Officer, PC Bryan, of Northamptonshire Police Force.

PC Bryan, on behalf of the Chief Constable, makes an application for a review of the Club Premises Certificate, advocating at paragraph C of the application and in his supporting statement that the Club Premises Certificate should be revoked. The review is due to be held on the 9th of January 2011 at Guild Hall.

Please accept this letter as notice that Mr Stevens, a solicitor with our firm, will attend the aforementioned hearing to make representations on behalf of the Club.

The grounds of the Police application are (briefly) that criminal activity has taken place in the Club and on the Club's property. Senior members of the club have undertaken the criminal activity and the committee members have been complicit in that criminality.

The Eastern District (North) Social Club opposes the Police application on the following grounds:

1. The application is manifestly disproportionate in all of the circumstances and amounts to no more than a "guilty by association" argument.

Northamptonshire Police are "***of the opinion that if members of the committee were not involved in this high level of criminality at the club, then they were complicit[e] to it.***" The suggestion that the Committee Members were complicit in the criminality should be disregarded. Complicit means to participate in a questionable act or crime. The Committee Members are deeply offended by this stated opinion. This opinion has simply cast baseless accusations on all members of the Club and particularly the 10 committee members whom are wholly innocent of any wrong doing whatsoever. If the police had evidence that any committee members aided, abetted or procured the offences mentioned in the Licensing Officer's statement or acted on the basis of joint enterprise, then they would have been prosecuted.

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The application is excessive and disproportionate due to the fact that it is based on the grossly offensive opinion, regarding the committee members, held by the applicant. An application based on such on an opinion has no merit.

Moreover, the investigation concluded in March 2009. The application to review the Club Premises Certificate was submitted 21 months after the investigation concluded. The fact that there has been no other incident in the last 21 months is evidence that the Police submission, that the Licensing Sub-Committee should withdraw the Certificate, is unnecessary, disproportionate and in all the circumstances manifestly excessive.

3. The withdrawal of the licence would adversely affect the local community and the estimated 290 members of the Club. Penalising so many for the actions of a few is unjust and excessive disproportionate. The club members have collected a petition with 165 signatures in support of their Club.
4. The application purports to be relevant to one of the licensing objectives, namely the prevention of crime and disorder. The police have duly dealt with that issue by successfully prosecuting those involved in the criminality. The fact that the investigation has been successful will deter any other would be wrongdoer from committing crime on the Club premises. The objective has been met and the fact that there have been no other incidents in the last 21 months speaks to that issue.
5. Modifying the conditions of the licence/suspending the Certificate would seriously damage the chances of the Club moving into profit and clearing its debts.

The Eastern District (North) Social Club provides valuable community facilities to members and non members. Those facilities cannot be replaced if it was unable to continue in its present capacity. The Club has a safe affordable function room that regularly accommodates weddings, christenings, wakes and anniversaries. The Club hosts a football team, two pool teams and a ladies darts team. The Club hosts bingo and line dancing nights and is very family orientated. The Club members also regularly support charities with raffles.

The police application advocating the revocation of the Club Premises Certificate is attempting to penalise the Club members retrospectively. The application would have been more relevant 21 months ago but due to intelligence issues and the police decision to preserve evidence for the trials, it has been delayed. It is therefore plain that the application is looking backwards and based on those circumstances that prevailed many months ago. The applicant has not enquired or produced any evidence that there is an ongoing problem or even if the application is relevant today. There is no continuing criminality; the offenders have been dealt with and excluded from being members. The review on January 9 2011 will look to the future and consider what could be done to ensure compliance with the licensing objectives. On the face of it there is no obvious condition or modification to the Certificate required in the absence of any evidence that the licensing objectives are not being met today.

On behalf of the Eastern District (North) Social Club members we respectfully suggest that the police application should fail and that no modification to the Certificate is required.

Yours faithfully



hc solicitors LLP
jason.stevens@hcsolicitors.co.uk

PETITION

To: The Licensing Department, Northampton Borough Council, The Guildhall, St Giles Square, Northampton, NN1 1DE.

Re: The Eastern District (North) Social Club, Premises Licence/Club Certificate Review

The Eastern District (North) Social Club provides valuable community facilities to members, and non-members, that local pubs, community centres and other clubs cannot replicate or replace if it were to be closed down. Our function room is a safe and affordable place that regularly accommodates Wedding Receptions, Christenings, Funeral Wakes, Birthday Parties, Anniversaries and much, much more.

We have a Football Team, two Pool Teams and a Ladies Darts Team.

Amongst other things, we have Bingo Nights, Line Dancing and even provide a place for a Local Band to practice.

As a SOCIAL Club, unlike many other clubs, we are very 'family' orientated, and have designated areas for parents where their children can play safely and under supervision. The club provides, or the members donate, all play equipment. We often hold seasonal raffles, such as the Christmas Raffle, for example, where the proceeds go to an open Children's' Christmas Party, where every child gets a present, as well as free food and entertainment.

All of this is would be impossible without the dedication and generosity of the club members and the committee, who regularly donate their time, expertise and energy into keeping our club going as a non profit, but valuable, community resource. These facilities will be lost, all that hard work wasted and there will be untold damage to our local community if the Licensing Authority decide to withdraw our licence.

We understand that there were a few individuals that attracted the attention of the police in the past, and who had, or still have, certain associations to the club, and that this is the reason for the upcoming review, however we submit that firstly: Those individuals have been dealt with accordingly by law. Secondly: It would be wholly wrong to impose any punitive judgement on our club, where those adversely affected would be the vast majority of totally innocent members and non members alike.

We, the undersigned, petition the Licensing Authority to take into consideration all of the above, and to take into account the individual signatures herein, as comprising just a small sample of the many individuals who could be affected by a negative decision. We respectfully request the continuation and/or renewal of The Eastern District (North) Social Club, Premises Licence and/or Club Certificate with, or without, condition:

NAME	ADDRESS	SIGNATURE
J. DEANS	22 PRENTICE COURT NN3 8XS	
M. NORWOOD	22 PRENTICE COURT NN3 8XS	
R. CLIFFORD	2 SIDE BROOK CT NN3 8ST	
R. COX	15 HORSEWELL CT. NN3 7XB	
J. DEEGAN	108 FULLINGDALE RD NN3 2QJ	
D. MARRS	35 LONGMEAD COURT NN3 8QQ	
S. CASWELL	5, PICKMEAD COURT NN3 8RB	
P. O'BRIEN	98 SPENCER BRIDGE ROAD	
JOHN MILLS	82 PRENTICE COURT NN3 8XL	
MELVYN DIXON	14 SMYTHE COURT	
E. DAVIES	53 DAVIDS COURT NN3 8X1	
T. BUTCHART	37 CHASSWORTH AV NN3 8SD	
M. LEE	12A CHESTER HOUSE N'PTON NN3 4XE	
K. McDONALD	21 GREAT GULL CRES NN3 5AZ	
R. ROBERTS	36, ARBOURVIEW CT N'PTON NN3 8AP	
P. HAMMOND	25 BELL CRESANT NN3 8SG	
B. MULLANEY	16 LOWER MEADOWS CT NN3 8AL	

Re: PETITION The Eastern District (North) Social Club, Premises Licence/Club Certificate Review

NAME	ADDRESS	SIGNATURE
Tommy Ross	91 MAIDEN CASTLE	[Signature]
Richard Stansfield	12 LETFORD CR	[Signature]
Rhian Tully	24 Midfield Court, Thorplands	[Signature]
MR MIC DANIELS	2 WASHBROOK CLOSE NN39AP	[Signature]
HARMUK SINGH	21 SOUTH PADDOCK COURT NP1	[Signature]
D. G. M.	1 N CHOLLS CE	[Signature]
P SHAH	21 SOUTH PADDOCK CLOSE NN39AP	[Signature]
Abraham Samaloussi	CO WATER TAMP. C	[Signature]
GARY TOMS	7 HONORABLE SQ SOUTHFIELDS	[Signature]
E COOK	24 DONNELLAN GREEN SOUTHFIELDS	[Signature]
N WHITE	17 BOLDST COURT BOLDING	[Signature]
DOO SMITH	SPELHOE ST. N'PTON	[Signature]
BARRY BUCHANAN	30 MIDDLEMORE SOUTHFIELDS NORTH	[Signature]
Raymond NEMPE	24 GREAT GULL SOUTHFIELDS	[Signature]
DOUG KENNEDY	52 OLD BARN COURT LINGS	[Signature]
MR + MRS SWORDS	3, NORTH PRIORS CT LINGS NN38AS	[Signature]
M. AHERNE	27 WAYPOST CT LINGS	[Signature]
DENNIS LEQUOT	26 SOUTH HOLME COURT THORPLANDS	[Signature]
HELEN LEVINE	26 SOUTH HOLME CT. THORPLANDS	[Signature]
BRIAN TURRY	6 DAIRY MEADOW PORT THORPLANDS	[Signature]
Ray Robins	18 Crowthorne Rd. Rectory Farm	[Signature]
GAIL TUNNALL	5, PILEMERE COURT BLK HILL	[Signature]
MATT BEAMES	32 CHERRY LODGE, BLACKBURN	[Signature]
ALAN BARR	12 NASEBY CLOSE W' BORO	[Signature]
Please keep Club open,		
Rectify any faults,		MS
Get on your knees		
Thank God you're on your feet		
SAM	NOR. HOLT DANTON	[Signature]
B.G. GALT	6, WATTON LANE CT.	[Signature]
BAB	NATHAMPTON	[Signature]
[Signature]	51 ZAYWEN COURT NORTHAMPTON	[Signature]

Re: PETITION The Eastern District (North) Social Club, Premises Licence/Club Certificate Review

NAME	ADDRESS	SIGNATURE
Kath Tully	6 Dairy meadow court, North	<i>Kath Tully</i>
Stacey Woodhall	15 longwood ct Blackthorn	<i>Stacey Woodhall</i>
Tasha Bettles	12 Paddockmill ct Blackthorn.	<i>Tasha Bettles</i>
Claire HUGHES	34 GLOUCESTER CRESENT DECAPRE	<i>C. Hughes</i>
Susan McQuade	9 ROSKILL PLACE	<i>Susan McQuade</i>
JACKIE LARSEN	27 Aron Drive King Heath	<i>Jackie Larsen</i>
ALEX WILSON	20 FARM FIELD COURT, THORPLANDS	<i>Alexander Wilson</i>
FRANK CAMPBELL	20 DELL CRES	<i>F. Campbell</i>
ROY STARMER	6 LONG MALLOW'S RISE	<i>R. Starmer</i>
Tracey COX	25, Crane walk Thorplands	<i>T. Cox</i>
JIM COX	25 crane walk Thorplands	<i>J. Cox</i>
C R LINCOLN	ROAD HALL OLD BARN COURT. LINGS	<i>C. R. Lincoln</i>
CM LINCOLN	ROAD HALL OLD BARN COURT LINGS	<i>C. M. Lincoln</i>
C.R. FRANCIS.	48 KINGSWOOD PARK, NN3 8TB	<i>C. R. Francis</i>
E HAMMOND	43 KINGSWOOD PARK NN3 8TB	<i>E. Hammond</i>
S. Stanton	20 Priors ct NN3 8LB	<i>S. Stanton</i>
J GORVEY	10 DOLANWOOD NN3 8PU	<i>J. Gorvey</i>
Meria Lincoln	ROAD HALL, OLD BARN COURT LINGS NN3 8TB	<i>M. Lincoln</i>
B. MITCHELL	15. Washbrook Green NN3	<i>B. Mitchell</i>
Destiny Lincoln	24 Drykes Court NN3	<i>D. Lincoln</i>
Carina Lincoln	Tond Hall old Barn Court Lings	<i>C. Lincoln</i>
Christina M Jackson	35 Wade Meadow Ct Lings	<i>C. M. Jackson</i>
Gyrene Jackson	35 Wade Meadow CF	<i>G. Jackson</i>
NORMAN HAMMOND	43 KINGSWOOD PARK NN3 8TB	<i>N. Hammond</i>
REG FRANCIS	48 KINGSWOOD PARK NN3 8TB	<i>R. Francis</i>
SIMON MCCOMACK	12 Drykes COURT GDDING	<i>S. Comack</i>
Carol GUB	22 PAVES CT NN3 8LR	<i>C. Gub</i>
N. SMITH	8. FAR MEADOW CT NN3	<i>N. Smith</i>
A. CROSS	21 DELL CRESENT N/TON	<i>A. Cross</i>
MMCGAINNOW	17 ARBOUR CRT LUMBERTHBS	<i>M. McGainnow</i>
C. GREENALL	" " " "	<i>C. Greenall</i>
BS GREENALL	" " " "	<i>B. S. Greenall</i>
Susan McQuade	34 GLOUCESTER Cress Deleapre	<i>Susan McQuade</i>
STEPHEN RILEY	12 PIKEMead CT BLACKTHORN	<i>S. Riley</i>
Paul Cubon	120 LINDSAY AVE NPTON	<i>P. Cubon</i>

CTC WINE JANE MEMBERS

Re: PETITION The Eastern District (North) Social Club, Premises Licence/Club Certificate Review

NAME	ADDRESS	SIGNATURE	
Lee McClellan	17 Addison Road Abington	[Signature]	
B. Taylor	5 BITTEN CT, NN3 8HH	[Signature]	
L Gordon	131 Greatmeadow Rd NN3 8DT	L Gordon	
S M ATAMBY	10 Pennycross Place NN3 5DZ	S M Atamby	
M LITTLE	44 Old Barn Ct, LINGS NN3 8LS	M Little	
Ann Burgess	77 CROWTHORP RD NN3 5EY	A Burgess	
R MATTAMBY	19 Nether Jackson Ct NN3 80F	[Signature]	
D LONGHURST	29 NORTH PADDOCK COURT NN3 8CG	D Longhurst	CAF
R INGRAM	18 MORTAR PIT RY. RECTORY FARM	R Ingram	CAF
P INGRAM	" " "	P Ingram	CAF
V Cordell	87 CRESKINE COURT Golding	Valerie Cordell	CAF
L Woodward	36, Quartercraft.	L Woodward	
D Stewart	31A' Quartercraft.	D Stewart	
J. Woods	32 Quartercraft	J. Woods	
V. PHILLIPS	126 COTSWOLD AVE DUSTON NN5 6DS	V. Phillips	CAF
C WILKINSON	132 COTSWOLD AVE DUSTON NN5 6DS	C. Wilkinson	CAF
G WILKINSON	132 COTSWOLD AVE DUSTON NN5 6DS		CAF
P RILEY	58 EILFIELD CRT. LINGS	[Signature]	
K Gordon	131 GREATMEADOW RD NN3 8DT	[Signature]	
B. Tully	24 Midfield Court Thraplands	B. Tully	
S GARDNER	27 AWON DRIVE Kings Heath	[Signature]	
D AUCOTT	42 ROADWAY NAT NN3 6BT	[Signature]	
I. JARDINE	21 - EAST BANK THRAPLANDS	[Signature]	
A.J. LITTLE	34 POPPYFIELD CT NN3 8NS	A.J. Little	
PAT GAWAGHER	49, FARMHILL ROAD NN3 5LH	[Signature]	
SONN THOMPSON	" " " " "	[Signature]	
Lauren Gordon	131 Greatmeadow Road NN3 8DT	[Signature]	
Terril Locke	19 middlemore southfields NN3 5DE	[Signature]	
COLIN MCCANN	19 TREE-TOPS Golding	[Signature]	
PAUL BERKOWITZ	63, Water Pump Cover NN3 80L	P. Berkowitz	
PAT SHEEHAN	28 Prentice Court	[Signature]	
Michael McCabe	28 Prentice court	MCC	
Michelle Sheehan	28 Prentice Court	M Sheehan	
Nicola Kerr	22 Prentice Court NN3 8XS	N. Kerr	
NIGEL DOWLING	2 SANDHILLS SOUTH FIELDS	[Signature]	

Re: PETITION The Eastern District (North) Social Club, Premises Licence/Club Certificate Review

NAME	ADDRESS	SIGNATURE
Elaine Davies	58, DAVIES COURT, GOLDINGS	<i>E. Davies</i>
Erin Naylor	34 Stonebridge Court, LINGS	<i>Erin Naylor</i>
RICHARD STUART	13 FLAYLANDS COURT LINGS	<i>Richard Stuart</i>
Paul Rowen	12, NORTH PADDOCK CT, LINGS	<i>Paul Rowen</i>
EMMA MAYLE	24, WILLOWBROOK SQ ECTON BROOK	<i>Emma Mayle</i>
JANE JONES	53, NETHERHEAD CT LINGS	<i>J. Jones</i>
A. PARKER	" "	<i>A. Parker</i>
E. PARKER	" "	<i>E. Parker</i>
S. ATKIN	27 NETHERHEAD CT LINGS	<i>S. Atkin</i>
P. SACEHAN	28 PRENTICE COURT	<i>P. Sacehan</i>
J. WADRON	101 MAIDEN CASTLE	<i>J. Wadron</i>
R. JACKSON	NN3 5HD	<i>R. Jackson</i>
J. JACKSON	NN5 7SG	<i>J. Jackson</i>
P. JACKSON	NN3 8ND	<i>P. Jackson</i>
C. JOHNSON	NN3 8NF	<i>C. Johnson</i>
P. WILSON	NN3 8NF	<i>P. Wilson</i>
M. JOHNSON	25 GREATFIELD CT NN3 8UU	<i>M. Johnson</i>
W. JONES	25 Greatfield Ct NN3 8UU	<i>W. Jones</i>
N. JONES	8 WINDSORD WALK	<i>N. Jones</i>
C. JONES	" " "	<i>C. Jones</i>
J. GRAY	4 COTTAGEWELL CT NN3 9DA	<i>J. Gray</i>
J. SMITH	39 CROTHORPE ROAD NUBBY	<i>J. Smith</i>
H. TOM	24 PRESTON CT NUBBY	<i>H. Tom</i>
D. HUISE	68A FULLINGDALE RD N'PTON	<i>D. Huise</i>
S. YORK	68A Fullingdale Rd N'pton	<i>S. York</i>
A. YORK	57 DEN CHESANT N'PTON	<i>A. York</i>
P. A. YORK	123 Fullingdale Rd. N'pton	<i>P. A. York</i>
J. C. YORK	123 Fullingdale Rd N'pton	<i>J. C. York</i>
S. GUR	54 Mortar Pit Rd N'pton	<i>S. Gur</i>
S. SLOAN	24 Cottagewell Ct N'pton	<i>S. Sloan</i>
Z. FRAVEL	118 Kingsley RD N'PTON	<i>Z. Fravel</i>
MRS WARD	312. BROADHEAD AVE N'PTON	<i>Mrs Ward</i>
MR MULCANY	15 West Leys Court, Moulton	<i>Mr Mulcany</i>
MR George - 510-	24 cottage-well court N'PTON	<i>Mr George</i>

