IN THE COUNTY COURT
Claim Reference: M00BH220

BETWEEN:
Sujeevan Muralimohan - Hillside Store Ltd (Claimant)
-and-
The Government Legal Department (Defendant)

WITNESS STATEMENT OF SUJEEVAN MURALIMOHAN

I, **Sujeevan Muralimohan**, of [redacted], make the following statement in support of my claim. I am the holder of a Personal Licence since 2011, with no previous infractions or concerns noted on my record. The matters set out in this statement are within my own knowledge unless otherwise stated, and where so stated, I believe them to be true.

1. Incident Overview

On **7 November 2024**, at **12:11 PM**, my convenience store, **Hillside Store**, was visited by officers from the Home Office Enforcement Team. As recorded on their arrival form (EXHIBIT 1). I was on shift from **8:00 AM** and was present at the premises at the time of the raid.

Upon entry, the officers proceeded to the rear of the premises where they encountered [redacted] acknowledged their presence. He was then escorted by two officers to the front till area. Subsequently, he was pulled out and **physically manhandled** in a way that falsely depicted him as resisting arrest or attempting to flee—claims which are **entirely fabricated** (EXHIBIT 2).

2. Treatment of [redacted]

[redacted] was arrested on suspicion of overstaying his visa. The investigation was conducted in **English**, a language that [redacted] does not speak fluently. Despite me informing the officers of this, they proceeded without an interpreter. During the course of questioning, [redacted] was **intimidated into falsely admitting** he was employed at my store—a statement he **clearly denies** in the CCTV audio recording (EXHIBIT 3).

Furthermore, the officers **forcefully unlocked his mobile phone** without consent. No evidence was recovered to suggest any link between [redacted] and my business.

I repeatedly requested that the officers refrain from physically harming [redacted] and that they move him outside the store to avoid disrupting business, as customers were entering. Following this, the officers turned their attention toward me and began asking **irrelevant and accusatory questions** relating to my Personal Licence—despite there being no Licensing Officer present to validate or assess my responses.

Questions included:

- "What do you do when training staff?"
- "What protocol do you follow when selling alcohol?"

I was informed I would receive a follow-up call for an interview, which never occurred. Instead, my informal remarks were **misrepresented** and used as **falsified evidence**, alleging that I had trained [redacted] which is categorically untrue.

Despite offering access to my **CCTV footage** to confirm my presence on shift, the officers declined. They instead requested access to the flat above the premises to verify whether [redacted] resided there. I explained that I had no involvement with the flat but nonetheless facilitated access by speaking to the tenants. A thorough search was conducted and **no evidence** was found linking [redacted] to the property.

[redacted] was removed from the premises after approximately two hours and was later released from custody. His official statement, taken **with the assistance of an interpreter**, made **no reference to my store** whatsoever (EXHIBIT 4).

3. Reputational and Financial Harm

Following this incident, my business and I were **unjustly reported** to several external authorities, including:

- **Allwyn Lottery**
- **RSPCA**
- **Bournemouth Council**
- **Fire and Safety Services**

Each of these authorities conducted follow-up visits. All, except Allwyn, concluded their assessments with **no concerns** and **no further action**. However, **Allwyn suspended my lottery services without conducting a proper investigation**, in direct contravention of their protocol. Despite repeated efforts to defend my position and prove my innocence, Allwyn permanently **cancelled my services**, which has had a **significant negative impact** on my business revenue (EXHIBIT 5).

The cancellation was solely based on **inaccurate and misleading information** provided by the Home Office Enforcement Officers and the outcome of the **civil penalty appeal**, which was itself based on false grounds.

In response to further allegations by the Enforcement Team made to Allwyn, I categorically deny any involvement in the sale of counterfeit cigarettes or nitrous oxide. If such an offence had occurred, I respectfully submit that the appropriate procedure would have been for the Enforcement Officers to seize the alleged stock and for Trading Standards to initiate an investigation or follow-up action, which did not take place.

As for the novelty vodka bottle, this item was part of a yearly charity raffle held at the store. During prior inspections, including those conducted by officials from Bournemouth Council,

no concerns were raised in relation to this item or the raffle itself.

I strongly dispute the claim that the Premises Licence was not displayed at the time of the visit. This allegation is untrue. The licence has been prominently displayed at the premises for several years. In fact, it was the officers themselves who removed it from its position during the course of their questioning.

I am thankful to have had access to CCTV footage from the incident. Without it, I would not have been able to demonstrate the facts accurately or defend myself against the false claims made in relation to these events.

I am also deeply concerned about the information that was reported to Allwyn and used in support of the civil penalty—specifically, the claim that [redacted] was working at the store on certain days and at specific times.
These assertions are entirely unfounded, and I am left questioning the origin and legitimacy of such claims, which have caused me significant distress and reputational harm.

I have completed the formal complaints procedure against the Home Office, and the matter is currently under review by the Independent Complaints Examiner for the Home Office (EXHIBIT 6). The response to my complaints were contradictive and changing.

Additionally, I have raised concerns regarding the officers' failure to follow proper protocol, including their omission in identifying themselves upon arrival and their failure to inform me of my legal rights during the encounter.

4. Fabricated Statement

A statement was allegedly taken from [redacted] at the time of his arrest. I have been informed that this statement was signed **without the presence of an interpreter** and under pressure. This document was then used to falsely implicate me, despite being entirely inaccurate and uncorroborated by any credible evidence.

5. My Relationship with [redacted]

[redacted] first approached me **in early 2024** seeking employment. Although his documents at the time appeared valid, I declined to hire him due to his **limited English**, as customer service is a key priority in my business.

On a second occasion, when his immigration status was found to be invalid, I again refused employment. Instead, I offered humanitarian assistance by providing food, some clothing, and a lift to the train station.

He returned once more claiming he had left his documents in my car. However, in **April 2024**, my property was **burgled** while I was away with my family and my car was **stolen**. I explained this to him while we were chatting and having a cigarette outside the back of the store. It was during this conversation that the Home Office officers arrived and carried out the enforcement action. Incident reference number for burglary : [redacted]

6. Conclusion

The conduct of the enforcement officers, both during and after the visit to my store, has caused me **severe mental distress** and **serious financial hardship**. I believe the actions taken against me were **unfounded, procedurally flawed**, and **disproportionately harmful**.

In conclusion, this entire incident has caused serious and lasting damage to both my personal reputation and that of my business. Photographs of the store and the enforcement action were taken and circulated on social media, further compounding the reputational harm. Additionally, misinformation reported to various authorities has led to financial losses for my business and has caused immense emotional distress to me, my family, and our newborn child.

All of this could have been avoided had the officers followed proper procedures or, at the very least, reviewed the CCTV footage which clearly shows who was working that morning. I must reiterate that [redacted] was neither arrested while working nor found behind the counter in any capacity that could reasonably suggest he was employed at the premises.

A key point in this matter is that the civil penalty was issued without any substantive grounds or evidence that [redacted] was employed at my store. This action appears to be the result of a failed enforcement mission, and instead of acknowledging their error, the officers involved appear to have tried to justify the operation by fabricating and misrepresenting facts to implicate me. I am deeply disappointed by the apparent misuse of authority demonstrated by the officers involved, and by their continued refusal to acknowledge or take responsibility for the errors made during the course of their actions.

I respectfully request that the court consider the evidence I have provided and acknowledge the impact these events have had on my personal and professional life.

I respectfully request that the Court cancel the civil penalty issued against Hillside Store, as it is unsupported by credible evidence and has been challenged by the factual and substantiated material presented in this statement and accompanying exhibits.

Furthermore, in light of the significant financial and emotional hardship this matter has caused me and my family—despite my full compliance and cooperation—I seek any financial compensation the Court deems appropriate to help me recover and continue supporting my family.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true.

Signed: [redacted]

Sujeevan Muralimohan

Dated: 15/04/25