

**WADIA GHANDY & Co.**  
**ADVOCATES & SOLICITORS**

Estd. 1883

\* NOSHIR J. SETHNA  
HAMID A. MOOCHHALA  
DJENA B. SUNAVALA  
MARYLOU A. BILAWALA  
ASHISH A. AHUJA  
BINDI G. DAVE  
ANKIT A. MAJMUDAR  
FARID F. KARACHIWALA  
DHAWAL J. MEHTA  
SAUMIL R. VASAVADA  
FARIYAL Y. TAHSEEN  
SHABNUM A. KAJIJI  
XERXES N. ANTIA

\* NOTARY

Ref.No.:DJM/HC/10082/9235/10

**By Hand Delivery**

10<sup>th</sup> November, 2010

Mr. R. P. Anbhazagan,  
SIO, DRI, E-Cell, MZU,  
Directorate of Revenue Intelligence,  
Mumbai Zonal Unit,  
13, Sir Vithaldas Thakersey Marg,  
Opp Patkar Hall,  
New Marine Lines,  
Mumbai - 400020

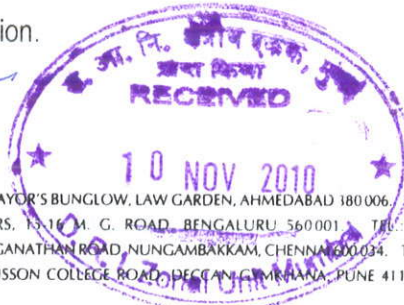
**Ref :** Your Summons File No.DRI/MZU/E/INT/12/2010/10265 dated 04.11.10 addressed to Shri Lalit Modi ("**Summons**")

Sir,

1. We act for Shri Lalit Modi.
2. The Summons was delivered, by Speed Post, at the office of Godfrey Philips India Ltd on 6<sup>th</sup> November 2010.
3. Our client has instructed us to respond thereto as under.
4. The Summons appears to be incomplete. It states that our client is required to "produce documents or thing(s) of the following description in your possession or under your control", without specifying what the documents or thing(s) are. We would therefore request that a list of what is required may kindly be supplied to him so that, if available with him, these can be furnished, so as to facilitate your investigation.

BRANCHES :

AHMEDABAD : WADIA GHANDY & CO. (AHMEDABAD) 1ST FLOOR, CHANDAN HOUSE, NEAR MAYOR'S BUNGLOW, LAW GARDEN, AHMEDABAD 380 006. TEL.: 91-79-26564700/4800 FAX: 91-79-26564300  
BANGALORE : WADIA GHANDY & CO. (SOUTH) 9TH FLOOR, VAYUDOOT CHAMBERS, 13-16 M. G. ROAD, BENGALURU 560 001. TEL.: 91-80-41233127/28 FAX: 91-80-41233129  
CHENNAI : WADIA GHANDY & CO. (SOUTH) 82, SPRINGFIELD, OLD NO. 9, NEW NO. 22, JAGANATHAN ROAD, NUNGAMBAKKAM, CHENNAI 600 034. TEL.: 91-44-43596858 /6868 FAX: 91-44-43596838  
PUNE : WADIA GHANDY & CO. (PUNE) OFFICE No. 12, SAGAR ARCADE, 616 FERGUSSON COLLEGE ROAD, DECCAN CANTONMENT, PUNE 411 004. TEL.: 91-20-25539950 FAX: 25520578



*Received on 10/11/2010*  
*Handwritten signature: Anbhazagan*  
*Handwritten text: (R. P. Anbhazagan) DRI Mumbai I.O. 9235/10 05.00 pm*

5. The Summons is (except for the date and time for appearance) identical to the Summons dated 27.10.2010, in the name of our client, that was similarly delivered at the office of Godfrey Philips India Ltd., on 29/10/2010. A copy of this Summons is, for convenience, annexed as Annexure "1" (at page 1). We had responded thereto by our letter dated 3<sup>rd</sup> November 2010. A copy of this letter is, for convenience, annexed hereto as Annexure "2" (pages 2 to 5).
6. For the sake of brevity, we reiterate what has been stated in our letter dated 3<sup>rd</sup> November 2010. The same may kindly be treated as forming part of this letter.
7. As no cognizance appears to have been taken off what was stated in our letter dated 03/11/2010, we reiterate the following:-
  - a. Our client is not in a position to attend your office at 11.00 hours today, as required under your Summons;
  - b. Our client conveys his sincere apologies for the same;
  - c. The reason for our client's inability to attend before you, is because of the elevated threat perception of a serious threat to his life and safety and that of his family members and is unable to remain present as requested.
  - d. Our client, in this behalf, requests you to kindly consider the following:-
    - i. On 14.10.2009, our client received an e-mail from an unknown source threatening him with dire consequences. The e-mail speaks for itself. A copy thereof was forwarded with our letter dated 3<sup>rd</sup> November 2010. The same is once again enclosed for your ready reference, as Annexure "3" (at page 6).
    - ii. Our client was informed, by the Mumbai Police that they had intercepted communications, which indicated the existence of a plan, by operatives of the underworld, for his assassination. Our client is not privy to the exact details of the intercepted communications and the steps taken in pursuance thereof, since this information is classified. The intelligence reports referred to are of the highest credibility and thus a legitimate apprehension of his safety.

- iii. The threat perception has however been the subject matter of a host of media reports, which have particularly commented on the existence of a threat to our client's life from the underworld. Copies of some of these media reports were forwarded with our letter dated 3<sup>rd</sup> November 2010. The same are once again enclosed, for your ready reference, as Annexure "4" (at pages 7 to 16).
- iv. During IPL Season 3 also there was a significant threat perception. As a result thereof, apart from the protection given by the local police authorities, our client was advised to employ private specialized close protection security. Accordingly, our client retained the services of NSA who are internationally recognized as specialists in close protection security to provide him additional protection. This was to the knowledge of local law enforcement agencies. It is for this reason that various states gave him additional high level security during IPL matches in the respective states. Our client, also submitted applications to the Government for importing enhanced security equipment (automatic weapons, armoured vehicles etc): at the time when he left India, these applications were still pending.
- v. As the IPL Season was over, there was a reduction in the level of protection by the local agencies. Our client however stayed back in India and co-operated with the Income Tax Department. After having responded to the Summons from the Income Tax Department and after finalizing his Reply to the BCCI Show Cause Notice dated 25<sup>th</sup> April, 2010, our client felt compelled to leave India on 13<sup>th</sup> May, 2010, on account of the continuing threat perception and serious concerns about his safety. It is significant to note that, at this stage, our client had not been summoned for any other investigation, by any other agency, including the Enforcement Directorate or yourselves.
- vi. Even after he left India, his son and wife were under threat. Our client therefore corresponded with the Mumbai Police. These letters form part of the documents forwarded to you under cover of our letter dated 3<sup>rd</sup> November 2010. This correspondence is once again enclosed for your convenience, as Annexure "5" (at pages 17 to 35). Our client's son was, as a result, provided continuous protection, even whilst in school.

- vii. In our letter dated 03/11/2010, we had drawn your particular attention to a report in the Mumbai Edition of the Times of India dated 18.07.2010, which reported that the Mumbai Police had confirmed the existence of a life threatening risk from the underworld. We once again request you to consider this.
- viii. In our letter dated 03/11/2010, we had also drawn your attention to media reports, as recent as 29<sup>th</sup> October, 2010 (on NDTV) which recorded that the Mumbai Police had confirmed the existence of the threat. The NDTV article is available on-line at the web site of NDTV (see: <http://www.ndtv.com/article/india/mumbai-police-endorse-lalit-modi-s-life-threat-claim-63329>).
- 8. We reiterate that if despite what is stated above, should you still require further corroboration, you may kindly verify the same from the Joint Commissioner of Police (Crime Branch) Mumbai.
- 9. In view thereof, our client cannot personally present himself in your office, as required.
- 10. Our client requests that this may not be construed as not co-operating with or assisting, the Directorate of Revenue Intelligence. Our client is willing to appear before you through video conferencing or in person, in London. His inability to physically present himself before you, in Mumbai, as requested, may kindly not be regarded as "willful" or a non compliance of your Summons. This inability is on account of genuine and bona-fide reasons, which have been set out above.
- 11. Our client wishes to emphasize that he is willing to offer all necessary co-operation in the matter. In particular:-
  - a. our client shall answer, orally or in writing, any questions or requisitions that the DRI, may wish to put to him;
  - b. our client shall answer questions through a video link;
  - c. our client shall appear before the DRI officials, in London, at a place of their convenience. They can question him for as long as they desire;

- d. our client shall, if required, make all arrangements for the travel and/or stay of DRI officials to London.
12. We trust that this establishes that our client is willing to fully co-operate with the authorities concerned. Our client is residing in London, which is a well known fact. His address and contact telephone numbers have already been supplied to the Department.
13. In the meanwhile, our client wishes to state that the various allegations of violations of law are false and motivated. The allegations that he has acquired foreign exchange outside India worth crores of rupees are completely false and motivated. Even the BCCI has not made any such allegations against him.
14. Our client respectfully urges that he is apprehensive as to whether the issuance of this summons, within a few hours of the receipt of our letter dated 3<sup>rd</sup> November 2010, without taking into consideration what has been stated therein, is an attempt to act on your threat, in the Summons, that his non attendance will constitute an offence under Section 174 of the Indian Penal Code.
15. Our client sincerely hopes that your actions are not motivated. If that be the case, you will kindly examine the contents of this letter and our letter dated 3<sup>rd</sup> November 2010 and verify the information from the concerned authorities and thereafter, in the interest of investigation, accede to the requests contained therein.
16. Our client is a well respected and law abiding businessman of repute. We hope that you will not precipitate matters.
17. We are enclosing herewith, the following documents :-

Sr. No.	Particulars	Page No.
	<b>Annexure 1</b>	
1.	Copy of the Summons under Section 108 of the Customs Act, 1962 bearing No.DRI/MZU/E/INT/12/2010/9989 dated 27 <sup>th</sup> October 2010 issued by R.P. Anbazhagan, SIO, DRI,E-Cell, MZU, Directorate of Revenue Intelligence to Lalit Modi.	1

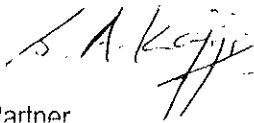
Sr. No.	Particulars	Page No.
	<b>Annexure 2</b>	
2.	Copy of the Letter dated 3 <sup>rd</sup> November 2010 addressed by Wadia Ghandy & Co., Advocates & Solicitors on behalf of Shri Lalit Modi in reply to the Summons dated 27 <sup>th</sup> October 2010.	2 - 5
	<b>Annexure 3</b>	
3.	Copy of the Email from unknown source threatening Shri Lalit Modi dated 14 <sup>th</sup> October 2009	6
	<b>Annexure 4 – Media reports</b>	
4.	Copy of the Media Report in Sunday Times of India, Mumbai published on July 18, 2010	7
5.	Copy of the Media Report published in Mid Day on April 12, 2009	8 - 9
6.	Copy of the Media Report dated April 14, 2009	10
7.	Copy of the Media Report dated April 3, 2009 published on website thatscricket.oneindia.in	11
8.	Copy of the Media Report published on website <a href="http://www.mid-day.com">www.mid-day.com</a> on April 4, 2009	12
9.	Copy of a Media Report published on internet	13
10.	Copy of the Media Report published in Mumbai Mirror on page 16 on July 19, 2010	14
11.	Copy of the Media Report published on July 18, 2010 on the website timesofindia.indiatimes.com	15
12.	Copy of the Media Report published on website <a href="http://www.mid-day.com">www.mid-day.com</a> on April 2, 2009	16
	<b>Annexure 5</b>	
13.	Copy of the Letter dated 23 <sup>rd</sup> May 2010 addressed by Lalit Kumar Modi to Mr. D. Sivanandan, Police Commissioner of Mumbai and copied to Mr. Himanshu Roy, Joint Commissioner of Police (Crime), Mumbai regarding concern of his son and wife's protection.	17 - 19
14.	Copy of the Letter dated 27 <sup>th</sup> May 2010 addressed by B.V. Parab, Inspector of Police, Anti Extortion Cell, D.C.B., CID, Mumbai to Mr. Lalit Kumar Modi regarding presence of Alvin Porter, for enquiry.	20 -21

Sr. No.	Particulars	Page No.
15.	Copy of the Letter dated 25 <sup>th</sup> May 2010 addressed by Lalit Kumar Modi to Mr. D. Sivanandan, Police Commissioner of Mumbai regarding police protection to his son.	22
16.	Copy of the Letter dated 28 <sup>th</sup> September 2009 addressed by Lalit Kumar Modi to the Dy. Commissioner of Police, Protection and Security, Mumbai regarding security arrangements for Nagpur visit of Mr. Modi on 30 <sup>th</sup> September 2009.	23
17.	Copy of the Letter dated 28 <sup>th</sup> September 2009 addressed by Lalit Kumar Modi to the Dy. Commissioner of Police, Protection and Security, Mumbai regarding security arrangements for Tirupathi visit of Mr. Modi on 29 <sup>th</sup> September 2009.	24
18.	Copy of the Letter dated 11 <sup>th</sup> September 2009 addressed by Lalit Kumar Modi to the Dy. Commissioner of Police, Protection and Security, Mumbai regarding personal security of his son Ruchir Modi.	25
19.	Copy of the Letter dated 11 <sup>th</sup> September 2009 addressed by Lalit Kumar Modi to the Dy. Commissioner of Police, Protection and Security, Mumbai regarding personal security of his wife Minalini Modi.	26
20.	Copy of the Letter dated 11 <sup>th</sup> September 2009 addressed by Lalit Kumar Modi to the Dy. Commissioner of Police, Protection and Security, Mumbai regarding security cover outside Maharashtra.	27
21.	Letter dated 9 <sup>th</sup> July 2009 addressed by Mr. Lalit Kumar Modi to Shri Jayant Patil, Minister for Home, Govt. of Maharashtra regarding permission for 100% sun controlled film for 5 cars at his residence and for hiring services of SDEMA group from Israel to do a survey on the status of security at his residence and office.	28
22.	Copy of the Letter dated 2 <sup>nd</sup> July 2009 addressed by Mr. Lalit Kumar Modi to Mr. Deven Bharti, Addl. Commissioner of Police (Crime) regarding permission for hiring services of SDEMA group from Israel to do a survey on the status of security.	29
23.	Copy of the Letter dated 1 <sup>st</sup> July 2009 addressed by Mr. Lalit Kumar Modi to the Regional Transport Officer, Thane regarding the sanction of 100% sun controlled films for cars.	30
24.	Copy of the Letter dated 23 <sup>rd</sup> May 2009 addressed by Sr. Manager Real Estate, Godfrey Philips India to the Sr. Police Inspector, Juhu Police Station, Mumbai regarding raising of compound wall of the residence of Mr. Lalit Kumar Modi	31

Sr. No.	Particulars	Page No.
25.	Copy of the Letter dated 19 <sup>th</sup> May 2009 addressed by Godfrey Philips India on behalf of Mr. Lalit Kumar Modi to Deven Bharti, Add. Commissioner of Police (Crime), Mumbai regarding approval for 100% security film to be put on cars	32 - 33
26.	Copy of the No Objection letter dated 3 <sup>rd</sup> April 2009 bearing No.307/Addl.C.P(Crime)/09 issued by Deven Bharti, Add. Commissioner of Police (Crime), Mumbai regarding import of bullet proof car.	34
27.	Copy of the Letter dated 9 <sup>th</sup> April 2009 addressed by Godfrey Philips India on behalf of Mr. Lalit Kumar Modi to the Commissioner of Police, Mumbai regarding import of bullet proof car for use of Mr. Lalit Kumar Modi.	35

Thanking you,

Yours truly,  
For Wadia Ghandy & Co

  
Partner

Encl: a.a.



Government of India  
Ministry of Finance  
**DIRECTORATE OF REVENUE INTELLIGENCE**  
Mumbai Zonal Unit  
13, Sir Vithaldas Thakersey Marg, Opp. Patkar Hall,  
New Marine Lines, Mumbai - 400 020.  
Tel. # 2201 0324, 22050191/ 22050192 Fax # 22010323

**SUMMONS UNDER SECTION - 108 OF THE CUSTOMS ACT, 1962**

File No. DRI/MZU/E/INT/12/2010/ 9989

Date : 27.10.10

To,  
Shri Lalit Modi,  
M/s. Godfrey Phillips India Ltd.,  
White Stove, GPI Complex,  
Sahar Road, Near Sudha International Hotel,  
Chakala, Andheri (E), Mumbai - 400099.

Whereas, I, R.P. Anbazhagan, Senior Intelligence Officer (SIO), Directorate of Revenue Intelligence (DRI), Mumbai Zonal Unit (MZU), Mumbai, am making inquiry in connection with import of aircraft by M/s. Golden Wings Pvt. Ltd.

And Whereas, I consider your attendance necessary to: -

- (a) give evidence and
- (b) produce documents or thing(s) of the following description in your possession or under your control:

Now, therefore, in exercise of the powers vested in me under Section 108 of the Customs Act, 1962, I do hereby summon you to appear before me in person for the purpose mentioned here-in-before on 03.11.2010 at 11.00 hrs at the office address.

Kindly note that you are not to leave this office without permission, and if the proceeding is adjourned, then without ascertaining the adjourned date.

Also it is brought to your notice that non-compliance of this summon is an offence under Sections 174 and 175 of the Indian Penal Code, 1860. You may note that giving false evidence in these proceedings is an offence punishable under Section 193 of the Indian Penal Code, 1860.

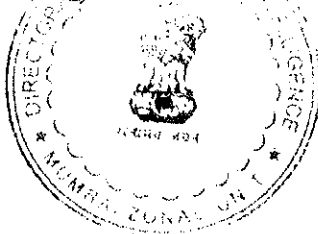
This inquiry shall be deemed to be a judicial proceeding within the meaning of section 193 and section 228 of the Indian Penal Code, 1860.

Issued today, the 27<sup>th</sup> day of October, 2010

Place of issue : Mumbai

Signature & seal of the issuing officer

Designation



(R.P. Anbazhagan)

SIO, DRI, E-Cell, MZU

Directorate of Revenue Intelligence

# WADIA GHANDY & CO.

## ADVOCATES & SOLICITORS

Estd. 1883

\* NOSHIR J. SETHNA  
HAMID A. MOOCHHALA  
DJENA B. SUNAVALA  
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\* NOTARY

N. M. WADIA BUILDINGS,  
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Telephone : (91-22) 2267 06 69

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Facsimile : (91-22) 2267 67 84

2267 02 26

General e-mail : contact@wadiaghandy.com

Personal e-mails : firstname.lastname@wadiaghandy.com

HC/DJM/10082/9164/110

3rd November, 2010

To,  
Mr. R. P. Anbhazagan,  
SIO, DRI, E-Cell, MZU,  
Directorate of Revenue Intelligence,  
Mumbai Zonal Unit,  
13, Sir Vithaldas Thakersey Marg,  
Opp Patkar Hall,  
New Marine Lines, Mumbai - 400020.

Ref: Your Summons File No. DRI/MZU/E/INT/12/2010  
dated 27.10.10 addressed to Shri Lalit Modi  
("Summons")

Sir,

1. We act for Shri Lalit Modi.
2. On 29/10/2010, the Summons was delivered, by Registered Post, at the office of Godfrey Philips India Ltd.
3. Our client has instructed us to respond thereto as under.
4. Our client has recently been informed that your department has issued a blue notice on 1<sup>st</sup> October, 2010 against our client. It is indeed surprising



### BRANCHES :

AHMEDABAD : WADIA GHANDY & CO. (AHMEDABAD) 1ST FLOOR, CHANDAN HOUSE, NEAR MAYOR'S BUNGLOW, LAW GARDEN, AHMEDABAD 380 006. TEL.: 91-79-26564700/4800 FAX: 91-79-26564300  
BANGALORE : WADIA GHANDY & CO. (SOUTH) 9TH FLOOR, VAYUDOOT CHAMBERS, 15-16 M. G. ROAD, BENGALURU 560 001. TEL.: 91-80-41233127/28 FAX: 91-80-41233129  
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that without even ascertaining our client's willingness to co-operate with your investigation, in a pre-determined manner, you have issued this notice. In view thereof, our client has grave apprehensions, of the real intent of your summons. Nevertheless and without prejudice to the aforesaid, our client apologises for not being in a position to attend to your office at 11.00 hours tomorrow, as required under the Summons. Our client is presently residing in London, a well known fact.

5. The reason for our client residing in London as also his inability to attend before you, is because of the elevated threat perception of a serious threat to his life and safety and that of his family members and is unable to remain present as requested. In this context, the following may be noted:-

- a. On 14.10.2009, our client received an e-mail from an unknown source threatening him with dire consequences. The e-mail speaks for itself and a copy thereof is enclosed for your ready reference;
- b. Our client was informed, by the Mumbai Police that they had intercepted communications, which indicated the existence of a plan, by operatives of the underworld, for his assassination. Our client is not privy to the exact details of the intercepted communications and the steps taken in pursuance thereof, since this information is classified;

R/M

- c. The threat perception has however been the subject matter of a host of media reports, which have particularly commented on the existence of a threat to our client's life from the underworld. Copies of some of these media reports are enclosed;
  - d. Your attention is particularly drawn to a report in the Mumbai Edition of the Times of India dated 18.07.2010, which reported that the Mumbai Police had confirmed the existence of a life threatening risk from the underworld;
  - e. Your attention is also drawn to media reports, as recent as 29<sup>th</sup> October, 2010 (on NDTV) which recorded that the Mumbai Police had confirmed the existence of the threat;
6. Despite what is stated above, should you still require further corroboration, you may verify the same from the Joint Commissioner of Police (Crime Branch) Mumbai.
7. In view thereof, our client will not be able to personally present himself in your office, as required. Our client is however willing to offer all necessary co-operation in the matter. In particular:-
- a. our client shall answer, orally or in writing, any questions or requisitions that the DRT, may wish to put to him;

*RML*

- b. our client shall answer questions through a video link;
  - c. our client shall appear before the DRI officials, in London, at a place of their convenience. They can question him for as long as they desire;
  - d. our client shall, if required, make all arrangements for the travel and/or stay of DRI officials to London.
8. We trust that this establishes that our client is willing to fully co-operate with the authorities concerned. The intelligence reports referred to are of the highest credibility and thus a legitimate apprehension of his safety.
9. Please find enclosed herewith our Vakalatnama in the captioned matter.

Thanking you,  
Wadia Ghandy & Co.

  
Partner

Encl: As above.

From: ashpak shaikh <ashpaks10@gmail.com> Date: Wed, 14 Oct 2009 16:22:25 +0530  
To: <lkm@iplt20.com> Subject: link with us in the name of ALLAH DEAR LALIT, Yeh ALLAH ,welcome to the underworld..thanks for trying to establish link with us..you will be assassinated in 2010-2011 by us..your efforts of trying to be with Sanjay Dutt whom we supplied arms and ammunition during BOMB blast have been considered..your efforts of being with Salman whose underworld links are established are considered and who has been arrested several times ..your fascination for bollywood is also noted..you are a BJP minded guy and these days we have strained relationship with Sanjay and Salman... we love your family also and people like you who will help us in destroying Bloody India.. we have heard that a PIL is being prepared to be placed in the HIGH COURT to establish your link with us in few months from now..now a days you are linked with us indirectly through this Bollywood stars....your assisantion is a must and be prepared for death in the name of ALLAH.. YEH ALLAH...

• SUNDAY TIMES OF INDIA, MUMBAI  
JULY 18, 2010

## Cops confirm underworld threat to Modi

S Balakrishnan Iyer

Mumbai: The police have confirmed that controversial Indian Premier League (IPL) chief Lalit Modi has indeed received a threat from don Dawood Ibrahim's principal aide Chhota Shakeel. Modi had stayed away from the disciplinary committee of the Board of Control for Cricket in India (BCCI) on the grounds that he had received a threat.

The threat, it is learnt, had to do with betting on matches in the third edition of IPL. TOI, in its edition dated April 23, 2010, had reported that the final match between Mumbai Indians and Chennai Super Kings was allegedly fixed. The TOI report highlighted the heavy involvement D-Company in the betting through Pakistani bookie Numan Miya and his Indian counterparts Rakesh and Rajesh.

The Jaipur bookies, who have since gone underground, are known for their proximity to certain major players of the Indian cricket business, sources in the bookiedom said.

The threat from Shakeel, who is based in Karachi, was essentially aimed at silencing Modi, the man who knows too much of the inside story of IPL matches, said sources.

Modi can spill the beans on the involvement of certain

powerful politicians in the seamy side of life in cricket, police sources told TOI.

Incidentally, Shakeel had similarly threatened and silenced Jagdish Joshi of Goa gutka who had intimate knowledge of the involvement of certain Indian politicians in gutka smuggling and manufacture in Pakistan. Joshi had told TOI how he received a call from Shakeel asking him not to give any information to CBI, which was probing the

The threat from Chhota Shakeel was essentially aimed at silencing Modi, the man who knows too much of the inside story of IPL matches, said sources

multi-crore gutka scam in which Dawood's brother Anas Ibrahim and nephew Abdul Hamid Antulay were involved.

Modi is likely to be provided with a foolproof security cover, especially when he comes to Mumbai.

Shakeel has a large reserve of shooters, all of whom can become active at short notice. Even in far off Mysore, Shakeel is believed to have his followers ready to do his bidding.

**YUVRAJ SINGH BUYS RS 5 CR HOUSE** Singh buys bachelor pad in Bandra close to teammate Sachin Tendulkar's new house > 3



**ENCOUNTER SPECIALISTS LEFT DEFENCELESS** The cops who rid Mumbai of its underworld now live under the shadow of fear as gangs might seek revenge > 4

**TRAVEL AGENTS STRIKE** Association opposing removal of commissions by foreign airlines; say they cannot work with zero commission as costs incurred by them are too high > 6

**ALL IS FORGIVEN NOW** Harbhajan Singh, who slapped S Sreesanth in the first edition of the IPL, now wants to see the hot-headed fast bowler fit and ready to bowl again > 14

APRIL 12, 2009, MUMBAI | 48 PAGES, INCLUDING PLAY | RS 5

For up dates log on to [www.mid-day.com](http://www.mid-day.com)

**SUNDAY  
MID  
DAY**



**FC Barcelona makes football fanatic Ranbir Kapoor their ambassador for India. Kapoor soon will meet heroes like Thierry Henry**  
SOON  
> PLAY



# BHAI MODI



**D Company boys are stalking IPL don everyday, everywhere, say cops. Spy inputs from across India and in SA suggest killers are closing in.**



**WOOD: REVENGE OR SURPRISE? > P2**

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# IPL beefs up security for Lalit Modi following reports of threat to his life

April 14th, 2009 - 2:16 pm ICT by ANI

Johannesburg, Apr. 14 (ANI): Following media reports about a threat on the life of Indian Premier League (IPL) chairman Lalit Modi, security agencies have reworked their plans to thwart any attempt on Modi's life.

The South African security agency, Nicholls and Steyn, which is looking after security arrangement for the IPL's second season, said it has taken all necessary steps in this regard.

"We are aware of it and we have taken the necessary precautions. I'm not going into any details on that," The News quoted the joint owner of the security agency Bob Nicholls, as saying.

Media reports had claimed that a close aide of underworld don Dawood Ibrahim, Chhota Shakeel is planning to target Modi either in India or South Africa during the IPL.

A Mumbai based tabloid also claimed that security agencies have intercepted a telephonic conversation between the gang members, the transcript of which shows that orders have been issued to target Modi.

According to reports, Shakeel could target Modi for number of reasons, the shifting of the tournament from India would cost the underworld gang millions of dollars as they would have to shift their betting operations to South Africa.

Modi's refusal to pay an extortion amount and his decision to keep Pakistani players out from the IPL's second season could also be other reasons. (ANI)





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# Lalit Modi and family live under threat

By: Vinod Kumar Menon Date: 2009-04-02 Place: Mumbai

Lalit Modi, chairperson of the Indian Premier League, and his family face a threat to their lives. Following an intelligence input, a round-the-clock security cover has been provided to Modi and his family.

Modi, who is in South Africa with wife Minal and son Ruchir, however, is unaware of any such development.

"I have no idea about the security cover you are talking about," Modi told MID DAY.

Speaking to MID DAY from South Africa, Modi said, "I came to South Africa 10 days ago and will remain here till the IPL matches get over."

But Zonal Deputy Commissioner of Police Niket Kaushik confirmed that Modi and his family have been provided with security cover. Modi will have a 'non-category' security, which includes round-the-clock armed policeman with 9mm pistols and an armed policeman each guarding his wife and son for 12 hours during the day.

This was confirmed by a senior IPS official. Armed cops will also be deployed at Modi's bungalow in Juhu. However, on Wednesday, when MID DAY visited the bungalow in Juhu, no policemen were seen at the spot. It was guarded by private security guards.

## Reasons

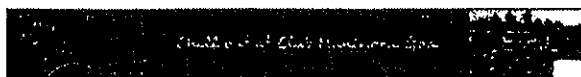
Sources from the protection branch said this is the first time they have received a request to provide security for Modi. He was never under any security cover before nor complained of any threat.

The IPL was shifted from India to South Africa. According to sources, those who were likely to benefit from the IPL in India may now be gunning for Modi's blood.

The tournament was rescheduled and moved out of India because the dates of the upcoming general elections were clashing with that of the tournament. The organisers failed to get any assurance from the government on security cover for the IPL in India, after the attack on Sri Lankan cricket team outside the Gaddafi Stadium in Lahore on March 3.

According to Kaushik, "Modi, being the face of the IPL, may be a target. Hence, it was decided to provide him with security."

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MID DAY MATE



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## Lalit Modi A Marked Man; Threat From The Underworld

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Indian intelligence agencies have warned that Lalit Modi, IPL chairman is among the latest to be on the hit list of the underworld. It has been alleged that Modi is being targeted because Pakistani cricket players have not been allowed to participate in the IPL this year. According to cricket news reports, a Pak based organisation had given a so called 'supari' to underworld don Chota Shakeel to 'eliminate' Modi either in India or South Africa. According to reports, this information was gleaned from the interrogation of shooter Rashid Malabari who is also connected with international cricket according to whom Modi is one of the prime targets of the gang of Chota Shakeel. Malabari is a gangster who is associated with the Chota Shakeel gang, and was arrested last week. It has been revealed that the main aim of the plot to assassinate Modi was to create panic and chaos ahead of the Indian elections.

And Modi is not the only one targeted by this gang; others such as Varun Gandhim (BJP candidate from Pilibhit) Pramod Muthalik (of the Ram Sene attacks on the Mangalore pub fame). Reportedly these are the other people on the Chhota Shakeel radar.

Modi reportedly became an underworld target after he failed to cough up the money demanded of him by the gang. In the event there is no perceived threat to the cricket players participating in IPL Season 2 for who the highest security measures will any way be in place. It is also the betting mafia which is involved in international cricket and which is highly active in the South African region according to cricket news reports.

There is also nexus between Islamic fundamental militant organisations and the underworld gangs which further ups the risk faced by Modi. Although agencies have indicated and cricketers are safe and not the target of militants, sabotage of matches is not inconceivable possibility which must be kept in mind.

## Legal counsel worried about threat to Modi



**LEGAL COUNSEL** of the Maharashtra Sahasra Shiksha Yojana (MSSY) is worried about the campaign against the government's financial aid to the poor.

Abdul Kader, who is the legal counsel of the MSSY, is worried about the campaign against the government's financial aid to the poor. He is also worried about the campaign against the government's financial aid to the poor.

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Printed from

**THE TIMES OF INDIA****Mumbai cops confirm threat to Lalit Modi**

S Balakrishnan, TNN, Jul 18, 2010, 01:00am IST

MUMBAI: The Mumbai Police has confirmed that controversial Indian Premier League (IPL) chief Lalit Modi has indeed received a threat from underworld don Dawood Ibrahim's principal aide Chhota Shakeel. Modi stayed away from BCCI's disciplinary committee's meeting on Friday, with his lawyer citing the threat.

The threat, it is learnt, had to do with betting on matches in the third edition of IPL. TOI, in its edition dated April 28, 2010, had reported about the alleged involvement of D-Company in the betting on IPL matches through top Pakistani bookie Numan Miya and his Indian counterparts Rakesh and Rajesh of Jaipur.

The Jaipur bookies, who have since gone underground, are known for their proximity to certain major players of the Indian cricket business, sources said.

The threat from Shakeel, who is based in Karachi, was essentially aimed at silencing Modi who knows too much about the "inside story of IPL matches", said sources.

Incidentally, Shakeel had similarly threatened and silenced Jagdish Joshi, owner of 'Goa gutkha', who had intimate knowledge of the involvement of certain Indian politicians in gutkha smuggling and manufacture in Pakistan.

Joshi had told TOI how he received a call from Shakeel asking him not to give any information to CBI which was probing the multi-crore gutkha scam in which Dawood's brother Anees Ibrahim and nephew Abdul Hamid Antulay were involved.

Modi is likely to be provided with a foolproof security cover, especially when he comes to Mumbai.

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## Lalit Modi and family live under threat

By: Vinod Kumar Menon

Date: 2009-04-02

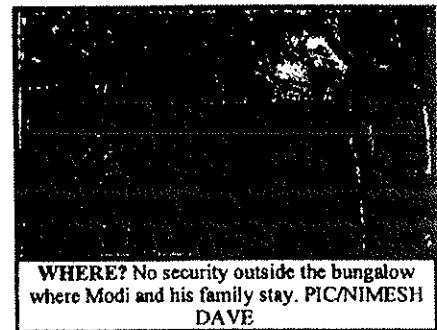
Lalit Modi, chairperson of the Indian Premier League, and his family face a threat to their lives. Following an intelligence input, a round-the-clock security cover has been provided to Modi and his family.

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"I have no idea about the security cover you are talking about," Modi told MiD DAY.

Speaking to MiD DAY from South Africa, Modi said, "I came to South Africa 10 days ago and will remain here till the IPL matches get over."

But Zonal Deputy Commissioner of Police Niket Kaushik confirmed that Modi and his family have been provided with security cover. Modi will have a 'non-category' security, which includes round-the-clock armed policeman with 9mm pistols and an armed policeman each guarding his wife and son for 12 hours during the day.



This was confirmed by a senior IPS official. Armed cops will also be deployed at Modi's bungalow in Juhu. However, on Wednesday, when MiD DAY visited the bungalow in Juhu, no policemen were seen at the spot. It was guarded by private security guards.

### Reasons

Sources from the protection branch said this is the first time they have received a request to provide security for Modi. He was never under any security cover before nor complained of any threat.

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According to Kaushik, "Modi, being the face of the IPL, may be a target. Hence, it was decided to provide him with security."



MODI ENTERPRISES

Lalit Kumar Modi

PRESIDENT &amp; MANAGING DIRECTOR

To Mr. D. Sivanandan

Sunday 23 May 2010

Police Commissioner Mumbai

Lok Manya Tilak Marg,

Mumbai.

Dear Mr. Sivanandan

I am writing this letter to you in concern of my Son & Wife's protection with regards to the new turn of events. From the 26<sup>th</sup> of April 2010 Alvin Porter from NSA South Africa has been working with my son Ruchir. Since he has started to work with Ruchir there has been a few events that have taken place and he has just addressed these events to me this morning. Turn of events reported to me by Alvin this morning follow -

1. The protection office on the 11<sup>th</sup> of May 2010 called Subeesh Soman who is Ruchir's other Personal Security Officer and had mentioned that effective 11<sup>th</sup> May 2010 Ruchir will not be getting 24hrs protection and he will only receive protection from 8am to 8pm.
2. Morning of 20<sup>th</sup> of May 2010 Ruchir's protection constable Sugriva Kamble who had been reporting to the 8am to 8pm duty since the beginning of the IPL tournament had been replaced by Rakesh Jagtap.
3. Morning of 21<sup>st</sup> of May 2010 No personal from the protection branch had reported to Ruchir's duty.
4. Morning of 21<sup>st</sup> of May 2010 we had received 3 letters delivered by Rajesh Wakkar (constable of Mumbai Police Protection Branch). I have attached all 3 letters.



**MODI ENTERPRISES**

**Lalit Kumar Modi**

PRESIDENT & MANAGING DIRECTOR

- a. First & Second letter stated the payment due for my Police Protection, which will be, cleared ASAP from the DY. Commr. Of Police (protection) Bombay.
  - b. The third letter dated 20<sup>th</sup> of May 2010 from the Sr. Inspector of Police (Protection) Bombay S.R.Ranchevre mentioned that Ruchir's protection will be canceled effective 21<sup>st</sup> May 2010.
5. 21<sup>st</sup> of May 2010 Ruchir was driving in a black BMW 740iLi which is usually my car and was escorted by a Honda Accord which is usually Ruchir's car. In the BMW Ruchir was seated along with the driver Roney D'Souza and Alvin Porter (Ruchir's Bodyguard), in the Honda Accord there were 3 people seated in the car, the driver Vijay Chowgule, Subeesh Soman (Ruchir's bodyguard) & Viswanath Jawlekar (Ruchir's 3<sup>rd</sup> bodyguard from Ace Security & Protection) on route from Cuffe Parade to our apartment building Westmore on Sir. Porchkanwala Road Worli, Mumbai, Alvin Porter noticed a Silver-Grey Mahindra Scorpio with his lights off which began to tail behind Ruchir's escort vehicle, Honda Accord for approx. 3km from half way point to the apartment in Worli. The second Alvin noticed the vehicle had tailed us to our street where the apartment building is located, Alvin then immediately instructed Ruchir's driver Roney D'Souza to drive past the apartment and continue straight along Sir. Porchkanwala Road while instructing Subeesh Soman who was in the escort vehicle, Honda Accord to stay back and stall the Mahindra Scorpio that was tailing us. Ruchir's driver then rerouted towards Worli Seaface rendezvous to the apartment. Subeesh then informed Alvin that the vehicle that was tailing us had noticed the Honda stalling him, then had speed off into a nearby ally way. Subeesh did not engage and had rerouted to the apartment and made sure that he was not being tailed by changing his route.
6. 22<sup>nd</sup> of May 2010 Ruchir had attended an American School of Bombay function where he attends school, the function took place at the Taj Lands End, Bandra, Mumbai. Ruchir then departed to Cuffe Parade then



**MODI ENTERPRISES**

**Lalit Kumar Modi**

PRESIDENT & MANAGING DIRECTOR

to Privé a lounge in Colaba to meet with friends. Ruchir had booked a table at Privé in his name; Subeesh noticed then informed Alvin that there was a group of 4-5 men standing nearby his table the whole time Ruchir was there. A member of the same group of 4-5 men standing nearby his table had taken a photo of Ruchir, Alvin and Subeesh then walked off into the crowd. The rest of the group remained nearby Ruchir's table, where one of the men in the group (a bald man in a green t-shirt) began pointing at Ruchir this was noticed by Subeesh and Alvin. Then Alvin approached a random patron in the crowd and asked he knew about the group standing by the table, the patron quoted to Alvin that "Those guys are gangsters, they are Indian mafia you do not want to mess with them". Alvin then immediately informed Subesh and evacuated Ruchir with help from 3 of the Privé Security through the rear service area. Ruchir was then seated in a Black BMW 750Li, which I used to use for the past 2 years. Immediately from Privé Ruchir departed to the apartment in Worli escorted by his security team Alvin, Subeesh, and Viswanath.

I urgently request you to assist me in this matter and provide Ruchir and my wife Minal Modi with a high level of police protection 24 hours. I am willing to bear costs for the protection that you provide my family.

Kind Regards,

**Lalit K Modi**

cc. Mr Himanshu Roy

**Joint Commissioner of Police (crime) Mumbai**

MOST URGENT

O.W. No. 222/AEC/BVP-20010  
Office of Sr. Inspector of Police,  
Anti Extortion Cell,  
Detection Crime Branch, C.I.D.  
Mumbai  
Date 27/05/2010

To,

Shri Lalit Kumar Modi,  
President & Managing Directors,  
Modi Enterprises,  
Nylon House, Dr. Annie Besant Road,  
Mumbai -400025.

Subject- Personal Presence for enquiry.

Reference- your letter dated 23/05/2010 addressed to C.P. of Mumbai.

With reference to the above caption, it is hereby to inform you that, this cell has received your complaint regarding the threat perception of your son Shri Ruchir Modi. According to the complaint, the presence Alvin Porter, personal body guard of Ruchir Modi is required at this cell for thorough enquiry for the incident occurred on 22/05/2010 at Prive lounge at Colaba.

It is therefore, requested you to direct Alvin Porter, to remain present at this cell and see undersigned on 31/05/2010 by 11.00 am for enquiry about the threat perception.



*B. V. Parab*  
27/05/10  
( B. V. Parab )  
Inspector of Police,  
Anti-Extortion Cell,  
D.C.B., C.I.D. Mumbai.  
09870546746

From -

Office of  
Sr. Inspector of Police  
Anti Extortion Cell  
D.C.B.C.I.D. Mumbai  
D.N. Road,  
Mumbai 400001.



MODI ENTERPRISES

Lalit Kumar Modi

PRESIDENT & MANAGING DIRECTOR

To Mr. D. Sivanandan

Sunday 25 May 2010

Police Commissioner Mumbai

Lok Manya Tilak Marg,

Mumbai.

Dear Mr. Sivanandan,

I would like to thank the Mumbai Police for providing us with full assistance on the new turn of events that have taken place with my son Ruchir and resuming my sons police protection for 12 hrs during the day. Yesterday my legal advisor Mr. Mahmood Abdi and my son's personal security officer from NSA South Africa Alvin Porter had met with Mr. Himanshu Roy who had been very supportive and helpful towards this issue. I would like to express my concern on the police protection that is provided to my son, as you may know he currently is only being provided with an armed police officer from 8am to 8pm daily who is armed with a 9mm weapon. I would be grateful if you could provide him with police protection 24x7 who are armed with carbine weapon if possible.

Thanking you

Kind Regards,

Lalit K Modi

LALIT KUMAR MODI

September 28, 2009

To

The Deputy Commissioner of Police  
Protection and Security,  
Vajra Katak Marg,  
Mumbai - 400 001

Dear Mr. Shintre,

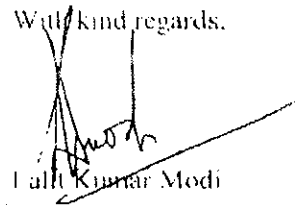
Sub: Security cover at Nagpur

This is to inform you that I will be traveling to Nagpur on 30<sup>th</sup> September 2009.

Kindly make the necessary security arrangements.

Any change in the schedule shall be intimated.

With kind regards,

  
Lalit Kumar Modi

*Received*  
*Handwritten initials*  
*28/09/09*

वरिष्ठ पोलीस निरीक्षक  
संरक्षण शाखा- १, मुंबई.

LALIT KUMAR MODI

September 28, 2009

To

The Deputy Commissioner of Police  
Protection and Security  
Vajra Kotak Marg  
Mumbai -1

Dear Mr. Shintre,

Sub: Security cover at Tirupathi

This is to inform you that I will be traveling to Tirupathi tomorrow morning at 10 AM and will be reaching there by 11 AM.

Kindly make the necessary security arrangements.

Any change in the schedule shall be intimated.

With kind regards,

  
Lalit Kumar Modi

*Received  
Security  
29/9/09  
Shinde*

वरिष्ठ पोलीस निरीक्षक  
संरक्षण शाखा- १, मुंबई.

LALIT KUMAR MODI

September 11, 2009

To

The Deputy Commissioner of Police  
Protection and Security  
Vaju Kotak Marg  
Mumbai -1

Dear Mr. Shintre,

**Sub: Security cover outside Maharashtra**

Further to my letter regards my Personal Security, this is an application for the Personal Security of my son - **Master. Ruchir Modi.**

He would be accompanied by **Mr. Shaji Jacob.** Mobile number : **+91 97699 66109.**

Any change in the schedule shall be intimated.

Kindly make the necessary arrangements.

With kind regards,

  
LALIT KUMAR MODI

✓Cc: Senior Inspector, Protection-I Branch

NIRLON HOUSE, DR. ANNIE BESANT ROAD, MUMBAI 400 025, INDIA.  
TEL: 4937391, CABLE: RHOTHANE, TELEX: 011-71376, FAX: 022-4937992

परिष्ठा पोलीस निरीक्षक  
संरक्षण शाखा-१, मुंबई.

31/9/09  
24 73525  
01-21/9/09  
1545103

LALIT KUMAR MODI

September 11, 2009

To

The Deputy Commissioner of Police  
Protection and Security  
Vaju Kotak Marg  
Mumbai -1

Dear Mr. Shintre,

**Sub: Security cover outside Maharashtra**

Further to my letter regards my Personal Security, this is an application for the Personal Security of my wife - **Mrs. Minakini Modi**.

She would be accompanied by **Mr. Tushar Shinde**. Mobile number: **+91 99694 60949**.

Any change in the schedule shall be intimated.

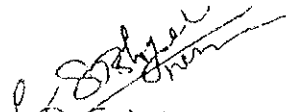
Kindly make the necessary arrangements.

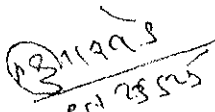
With kind regards,

  
LALIT KUMAR MODI

Cc: Senior Inspector, Protection-I Branch

NIRLON HOUSE, DR. ANNIE BESANT ROAD, MUMBAI 400 025, INDIA.  
TEL: 4937391, CABLE: RHOTHANE, TELEX: 011-71376, FAX: 022-4937992

  
परिवर्त पोलीस निरीक्षक  
संरक्षण शाखा - १ मुंबई

  
P. 18  
18/9/09  
18/9/09

LALIT KUMAR MODI

September 11, 2009

To

The Deputy Commissioner of Police  
Protection and Security  
Vaju Kotak Marg  
Mumbai -1

Dear Mr. Shintre,

**Sub: Security cover outside Maharashtra**

The Police Force has been doing a very good job by providing a high level Security to me and my family in Maharashtra. Since Security outside Maharashtra is a concern during the Champions League T20 to be held from 8<sup>th</sup> -23<sup>rd</sup> of October, 2009, (Delhi, Hyderabad, Bangalore), I had sent Mr. Christopher Malkhany and Mr. Sujith Kumar to your office to discuss the possibilities of getting Security cover outside Maharashtra.

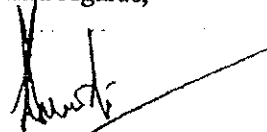
According to your suggestion I am sending this application with my schedule. I am also attaching two separate applications for my family.

*Mr. Sujith Kumar* will be accompanying me during the matches and his mobile number is +91 98198 00055.

Any change in the schedule shall be intimated.

Kindly make the necessary arrangements.

With kind regards,


**LALIT KUMAR MODI**

Cc: Senior Inspector, Protection-I Branch

NIRLON HOUSE, DR. ANNIE BESANT ROAD, MUMBAI 400 025, INDIA.  
TEL: 4937391, CABLE: RHOTHANE, TELEX: 011-71376, FAX: 022 4937992

वरिष्ठ पोलीस निरीक्षक  
संरक्षण शाखा- 9, मुंबई.

10/09/09  
840505  
P IV  
Dt: 10/09/09  
15400

## LALIT KUMAR MODI

July 9, 2009

To,  
Shri Jayant Patil  
Minister for Home  
Government of Maharashtra  
Mantralaya  
Mumbai 400 032

Dear Jayantji,

I hope this letter finds you well.

I am writing to you in regard to the security situation for my family and me. As you might know there is a perception of threat with regard to us.

In this regard, I have had my office try to acquire permission for 100% sun control film for the five cars at my residence, from the RTO and the Police Department. Unfortunately, both these departments are not able to give me the requisite permissions. I would request you to provide me the permission for my cars, so that when either my family or me travel in it, the passengers cannot be seen from the outside.

24/07/09 SF

लिपिक

गृहमंत्री, सचि कार्यालय

महाराष्ट्र सरकार

मंत्रालय, मुंबई

Further, I would like to hire the services of Sdema Group from Israel to do a survey on the status of security at my residence and my office. They require a NOC from our government to provide this service. Could I please request you to provide me this NOC, so that I could get them to survey the security situation for me.

My apologies for bothering you with such small matters.

Warm regards,

Lalit Modi

(Dictated by Mr. Lalit Modi and signed in his absence)

LALIT KUMAR MODI

July 2, 2009

To,

Mr. Deven Bharti  
Addl. Commissioner of Police (Crime),  
Mumbai

Dear Mr. Bharti,


First and foremost I would like to thank you for the security arrangements at my residence and the NOC for the import of an armoured car.

Given the perceived threat on my life, my family members have been very anxious, due to which I had involved Dr. Joseph Draznin to look into the security arrangements. Dr. Draznin would like to involve the services of the Sdema Group out of Israel to survey the situation and make recommendations, so that my family feels secure and comfortable.

The Sdema Group requires a no objection from you to carry out this survey and make their recommendations. I would request you to kindly issue a letter in this regard.

Thank you for all your help.

Best regards,



Lalit Modi



# GODFREY PHILLIPS INDIA LIMITED

Nirlon House, III Floor, Dr. Annie Besant Road, Worli, Mumbai - 400 030.  
Phones : 5663 7373 / 2496 0000 Fax : 2493 2260  
Website : <http://www.godfreyphillips.com>

July 1, 2009

To

The Regional Transport Officer  
Regional Transport Office,  
Near Central Jail,  
Thane - West 400 601

Dear Sir,

**Sub: Sanction for 100% Sun control film**

I am writing this letter on behalf of Shri Lalit K Modi, who is the Executive Director of Godfrey Phillips India Ltd.

In view of the recently perceived threat to the life of Shri Lalit K Modi and his family, round the clock Armed Police Guard at his residence and Armed body guard protection for each and every member of the family has been provided by the Police.

Shri Lalit Modi's family has two cars registered from your office which are used by his wife and children. We would request your approval for 100% Sun control film on all the car windows and wind screens, so as to protect the family when they travel.

The details of the cars are as follows

1. MH 04 BW 7878 - BLACK MERCEDES
2. MH 04 BS 800 - BLACK MERCEDES

We would be grateful if you could provide the approval for the above mentioned cars at your earliest convenience.

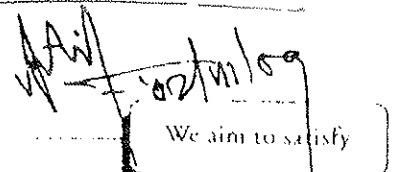
With kind regards,

Yours Sincerely,  
For Godfrey Phillips India Ltd.

Authorized Signatory

B.S.

*Plz inform & issue  
a letter according to  
provisions of M.V. Act  
& Rules made thereunder.*





Real Estate Dept  
White House, Ball Room  
Near Gift Factory, S.W. Road,  
Chhabra, Gandhinagar, Mumbai - 40  
Tel: 2822666 / 2822115  
Fax: 022 / 2826115

May 23, 2009

The Senior Police Inspector,  
Juhu Police Station, Juhu  
Mumbai - 400 049

Dear Sir

### Sub - Raising of Compound Wall

Our director Mr. Lalit Modi ( Vice President of BCCI and Commissioner of Indian Premier League ) stays at following address :

Ananda Bungalow,  
41, Gandhigram Road,  
Juhu, Mumbai - 400 049

As you may be aware Mr. Lalit Modi has received threats from underworld and notorious elements. A twenty four hour Police Protection has been provided to him and his family by Mumbai Police ( Protection 1 unit at Horniman Circle and Marol Police Headquarters )

As the said bungalow is surrounded by high buildings, Mr. Modi and his family's security is at stake. To counter this threat we want to raise the compound wall of the bungalow. A proposal in this regard has been forwarded to BMC ( EEBP- Western Suburbs office ) through our Architect, Major Pitale and Associates.

Considering the gravity of the matter, we kindly request you to give your No Objection to RMC in this regard at the earliest.

Thank you.

Jitendra Khanvilkar  
Sr. Manager ( Real Estate )



# GODFREY PHILLIPS

## INDIA LIMITED

Nirlon House, III Floor, Dr. Annie Besant Road, Worli, Mumbai - 400 030.  
 Phones : 5663 7373 / 2496 0000 Fax : 2493 2260  
 Website : <http://www.godfreyphillips.com>

CONFIDENTIAL

May 19, 2009

To  
 Mr. Deven Bharti  
 Addl. Commissioner of Police (Crime),  
 Office of the Addl. Commissioner of Police (Crime)  
 Mumbai

Dear Sir,

**Sub: Mr. Lalit Modi and Family**

I am writing this letter on behalf of Shri Lalit K Modi, who is the Executive Director of Godfrey Phillips India Ltd. Shri Lalit K Modi is currently camping in South Africa in connection with the conduct of Cricket T-20 Series of the IPL.

We are grateful to you for having provided round the clock Armed Police Guard at his residential bungalow in Mumbai, in view of the recently perceived threat to his life. And, providing the NOC for the import of a bullet-proof car.

We aim to satisfy



## GODFREY PHILLIPS INDIA LIMITED

Nirlon House, 111 Floor, Dr. Annie Besant Road, Worli, Mumbai - 400 030.  
Phones : 5663 7373 / 2496 0000 Fax : 2493 2260  
Website : <http://www.godfreyphillips.com>

Shri Lalit Modi's family has five cars, which is used by his wife and children. We would request for your approval to allow for hundred per cent security film to be put on all the cars windows and wind screens, so as to protect the family when they travel in the these cars.

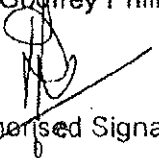
The details of the cars are as follows:

1. MH 04 BW 7878 - BLACK MERCEDES
2. MH 04 BS 800 - BLACK MERCEDES
3. MH 43 V 9592 - BLACK HONDA ACCORD
4. MH 43 V 9588 - BLACK HONDA CRV

We would be grateful if you could provide the approval for the above mentioned cars at your earliest convenience.

With kind regards,

Yours sincerely,  
For Godfrey Phillips India Ltd.

  
Authorized Signatory

We aim to satisfy

Confidential



No. 307/Adel.(C.P. (Crime))/09

अपर पोलीस आयुक्त (गुन्हे), मुंबई यांचे कार्यालय, मुंबई  
Office of the Addl. Commissioner of Police  
(Crime), Mumbai.

दूरध्वनी क्र. / Tel. No. 22620960

फॅक्स क्र. / Fax No. 22612830

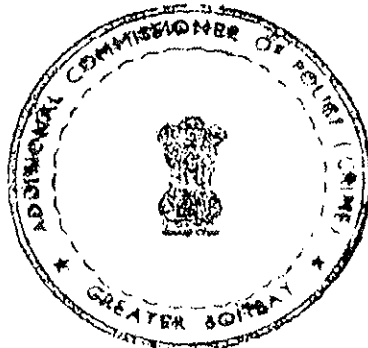
दिनांक / Date : 13/04/2009

TO WHOM IT MAY REFER

This is to convey "No Objection" to M/s Godfrey Phillips India Ltd having office at Nirlon House, 3<sup>rd</sup> floor, Dr. A.B. Road, Worli, Mumbai - 400 030 to import a 'Bullet-Proof Car' for the use of Shri Lalit K. Modi being the Executive Director of the aforesaid company, subject to following conditions.

Conditions

1. The company will ensure that all taxes/duties of customs, MCGM and other departments are duly paid.
2. The company will ensure that the Bullet-Proof Car, so imported will suit to all rules and regulations of Regional Transport Authority.
3. All other mandatory provisions under the prevailing laws in country, in this regard



*(Signature)*  
13/4/09

( Deven Bharti )

Addl. Commissioner of Police (Crime),  
Mumbai.



# GODFREY PHILLIPS INDIA LIMITED

Nirlon House, III Floor, Dr. Annie Besant Road, Worli, Mumbai - 400 030.  
Phones : 5663 7373 / 2496 0000 Fax : 2493 2260  
Website : <http://www.godfreyphillips.com>

April 9, 2009

To:

CONFIDENTIAL

The Commissioner of Police,  
Mumbai

Dear Sir,

**Sub: Threat to the life of Shri Lalit K Modi,  
Chairman & Commissioner, IPL**

I am writing this letter on behalf of Shri Lalit K Modi, who is the Executive Director of Godfrey Phillips India Ltd. Shri Lalit K Modi is currently camping in South Africa in connection with the conduct of Cricket T-20 Series of the IPL. We are grateful to you for having provided round the clock Armed Police Guard at his residential bungalow in Mumbai, in view of the recently perceived threat to his life from the underworld.

Because of the threat to his life from the underworld, our Company has decided to import an appropriate bullet proof car (which can provide protection against AK-56 rifle and B6 and B7 category of protection) for the use of Shri Lalit K Modi, while he travels by road. It is requested that NOC for importing the appropriate bullet proof car for the use of Shri Lalit K Modi may kindly be issued to us. For this act of kindness, we shall always remain indebted to you.

With kind regards,

Yours sincerely,  
For Godfrey Phillips India Ltd.

  
Authorised Signatory

We aim to satisfy