



NICHOLLS STEYN & ASSOCIATES (PTY) LIMITED

TO WHOM IT MAY CONCERN

I am Robert Ian Nicholls, a founding partner of Nicholls, Steyn & Associates ("NSA"). NSA is a South African based specialist provider of complete security solutions. We are considered to be leaders in our field and provide security services to numerous International VIPs and high profile events.

Background

This report is based on the events and details relating to security arrangements for Mr Lalit Modi and my recollection of events at this time.

NSA is contracted by the IPL to coordinate security arrangements for the teams participating in the IPL tournament. As a result of the IPL moving to South Africa in 2009, NSA was also requested to oversee security arrangements for senior IPL management, officials and VIP guests.

REPORT

April 2009

During the early phases of the planning process for security arrangements, I was at the Saxon Hotel in Sandton Johannesburg when I was called by Mr Lalit Modi to speak to someone on his phone, whom he had been having a conversation with.

The person, who was introduced by Mr Modi as a senior Mumbai police officer, advised me that the Mumbai police had identified a specific, serious security threat to Mr Modi. He advised me that high level security arrangements had to be implemented immediately for Mr Modi as it was very possible that this threat could impact on him whilst he was in South Africa.

I agreed that we would ensure that a high level of protection was in place for Mr Modi and also advised the caller that I would brief the South African authorities who could follow this up via official Governmental channels.

We immediately upgraded all security arrangements for Mr Modi and made contact with the South African Police services to brief them on this conversation. I was advised that they in turn referred this information to the South African Intelligence services. I later had a meeting with representatives of the South African intelligence services and reiterated the information that I had received.

I later received feedback that the South African intelligence service had been in contact with their Indian counterparts to receive a more detailed briefing than that which had been provided to me, though no further details were discussed with me. The issue of this threat was also raised at a number of meetings during the planning process and also in operational meetings held during the event but specific details were never discussed openly.

During the IPL event, the South African Police Services provided armed police escorts to Mr Modi from arrival until departure in each city that he visited. This was coordinated with the NSA protection team that remained with Mr Modi for the duration of the tournament. The fact that this level of protection was provided by the state indicated to us that the information investigated by the intelligence services was being taken seriously.

At one point during the tournament we were also advised by a police source that a group of men had been detained at OR Tambo International airport in

Johannesburg, apparently in connection to the threat against Mr Modi. This group was apparently of Pakistani descent and was released and allowed to enter South Africa after questioning. No further details were provided to us.

Although I requested further details of the threat against Mr Modi, as I felt that it would assist us in providing more effective protection, the South African intelligence services refused to provide any specific information either during the tournament or since. They have advised us that any discussion of such information would only take place at a "government to government" level and the information was therefore "classified".

I did speak to the same individual from Mumbai again on the telephone at a later date during the tournament, who confirmed that whatever threat had been discussed with the South African authorities still existed and that the current level of security arrangements should remain in place. This was provided until the completion of the IPL and Mr Modi's subsequent departure from South Africa.

IPL 2010

Prior to the commencement of the IPL tournament in India during 2010, I was called by the CEO of the IPL, Mr Sundar Raman, and was advised by him that the threat had once again arisen and that security for Mr Modi should once again be elevated. He made a specific request that we deploy two of our staff to Mr Modi's security detail immediately, which was done. These members (Theo Padayachee and Zaheer Boomgard) worked alongside Mr Modi's permanent security person (Surjeet) as well as a number of other private security staff and police officers.

Although I was not provided with specific details of the threat against Mr Modi, my assessment at the time was that the threat was being taken seriously by the Mumbai police, who had deployed a sizeable security team to Mr Modi's protection.

Throughout the IPL 2010, our staff remained with Mr Modi. As I was focussed on the security of all participating teams, I did not personally become involved with the operation, instead relying on operational feedback from Mr Modi and our own staff from time to time. All feedback provided by our staff was done verbally as is common practice to protect confidentiality.

I was advised in early May 2010, (approximately two and a half weeks after the end of the IPL 2010 tournament,) that the security provided to Mr Modi by the Mumbai police had been suddenly removed, which I found surprising as there had been no indication that the threat against Mr Modi had receded. I was advised that Mr Modi had departed from India shortly after this occurred, and our own staff returned to South Africa.

NB

The information provided in this report is based on my recollection of events that occurred during this period and certain assessments and views that are based on our experience of providing protection of this type over the past 15 years. In certain cases information we receive cannot be verified due to the refusal of the South African intelligence agencies to provide greater detail and such that we are reliant on verbal briefings.


ROBERT IAN NICHOLLS

Signed in Johannesburg, South Africa on the 24th day of August 2011