

BEFORE THE DISCIPLINARY COMMITTEE OF BCCI

In the matter of disciplinary
proceedings against Mr.Lalit K.Modi

STATEMENT OF Mr. PETER GRIFFITHS

I, Peter Griffiths, son of David Griffiths aged 49 years, having office at McCormack House, Burlington Lane, London W4 3TH do hereby solemnly affirm and sincerely state as follows:

1. I am the Senior Vice President, Director of Operations, IMG (UK) Limited. I have been working with this organisation since 1988.
2. I was the Director of Operations of IMG for the IPL. I have had interactions with Mr. Lalit K. Modi and I used to take instructions from him. Mr. Sundar Raman, the Chief Operating Officer of IPL has also accompanied Mr.Lalit K. Modi during my interactions.
3. I have been informed that Mr.Lalit K.Modi is facing the charge of inserting certain clauses in the ITT for two additional franchises which pertain to the provision of a bank guarantee for the bid amount and minimum networth of USD 1 Billion without the authority of the IPL Governing Council.
4. I was asked to attend a meeting at the Four Seasons Hotel, Mumbai on 20th February 2010 At that time, Mr.John Loffhagen who was the person in-

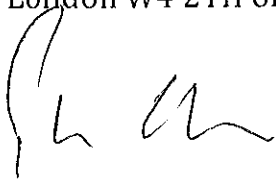


charge of preparing the legal documentation for the ITT was in London and I was filling in for him. Accordingly, I met Mr. Lalit K. Modi and at that meeting Mr. Sundar Raman was also present when Mr. Lalit K. Modi gave me specific instructions to inform Mr. John Loffhagen that inter-alia, two additional conditions would have to be incorporated in the ITT viz. a clause stipulating the bidder to provide a bank guarantee for up to the bid amount for the duration of the contract and the stipulation that the bidder should have a minimum networth of USD 1 Billion.

5. I state that I left the meeting and soon made a call to Mr. John Loffhagen and informed him of this requirement as expressed by Mr. Lalit K. Modi. I am aware that Mr. John Loffhagen carried out these instructions in the final draft of the ITT that came to be published.

6. I am swearing to this affidavit to place the above facts on record. The foregoing statements are true.

Solemnly affirmed at McCormack House, Hogarth Business Park, Chiswick, London W4 2TH on this third day of September 2010 by PETER GRIFFITHS.



Peter Griffiths

Witness Name.....*Julia Maurice*.....

Witness Signature.....*JM Maurice*.....