

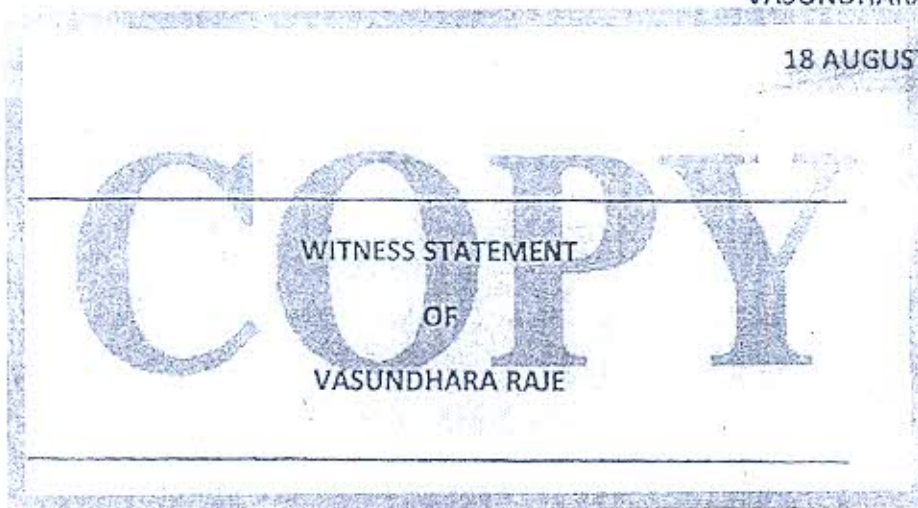
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Witness Statement of

VASUNDHARA RAJE

18 AUGUST 2011



I, Vasundhara Raje, of 13 Civil Lines, Jaipur, Rajasthan, India, will say as follows:

1. I make this statement in support of any immigration application that Lalit Modi makes, but do so on the strict condition that my assistance will not become known to the Indian authorities.
2. I am a national of India and am resident there. I was born on 8 March 1953 in Mumbai, India. I am currently the leader of the opposition in the Rajasthan State Assembly.

3. I am the daughter of the last Maharajah of Gwalior, Ganga Rajarao Scindia. My father ruled Gwalior state as monarch until India's independence in 1947. My mother, Vijayaraje Scindia, was a prominent Indian politician, having been elected to the Lok Sabha in 1962 as a member of the Indian National Congress ("Congress Party"). Five years later my mother left the Congress Party and joined the Bharatiya Jana Sangh party, which was the predecessor to the current Bharatiya Janata Party ("BJP"). She was an MP for many years thereafter, winning seven consecutive parliamentary elections.

4. My mother was one of the founding members of the BJP when it was formed in 1980. She was appointed as one of the Vice Presidents of the party. She remained a Vice President of the party until 1998 when, due to health reasons, she stepped down and quit her political career. She died in 2001.

5. My older brother, the late Madhavrao Scindia, was also a prominent Indian politician. He was a member of the Lok Sabha for nine terms, having never lost an election from 1971 when he was first elected. He was initially an independent candidate who was elected with the support of Bharatiya Jana Sangh. Following the imposition of a national emergency resulting in the concentration of power into the hands of the ruling Congress Party, my brother along with his immediate family switched allegiances to the Congress Party, despite opposition from within our extended family. He was Minister of Railways in Rajiv Gandhi's government and then Minister of Civil Aviation and latterly Minister of Human Resources Development under the premiership of Narasimha Rao. My brother was also President of the Board of Control for Cricket in India ("BCCI") from 1990 to 1993. He died in a plane crash in 2001. After my brother's death, his son Jyotiraditya Scindia followed in his footsteps and was elected in 2002 as the Congress Party MP for the seat left vacant by his father's death. He was subsequently re-elected in 2004 and 2009 and he is currently Minister of State for Commerce and Industry within the central government.

6. My younger sister Yashodhara Raja Scindia is also a politician in India. From 1998 to 2007 she was a BJP member of the Madhya Pradesh State Assembly. In 2007 she was elected to the Lok Sabha as the BJP MP for Gwalior, and was re-elected in 2009.
7. My son Dushyant Singh, is the BJP MP for Jhalawar, and was elected to the Lok Sabha in 2004 and re-elected in 2009.
8. I graduated in Economics and Political Science from Sophia College, Mumbai University. My connection with Rajasthan came following my marriage in 1972 to the then incumbent ruler of Dholpur, Maharaja Hemant Singh.
9. My involvement in politics started with my induction into the National Working Committee of the BJP in 1984. I was the Vice President of the State BJP Youth Wing from 1984 to 1986. I then was elected as the member of the Rajasthan Legislative Assembly for Dholpur in 1985 and served in this capacity until 1989. From 1987 to 1989 I was Vice President of the BJP in Rajasthan. In 1989 I was elected to the Lok Sabha as MP for Jhalawar (a city in Rajasthan). I was then re-elected for a further four successive terms in 1991, 1996, 1998, and 1999. In 1997 I was elected Joint Secretary of the BJP Parliamentary Party. In 1998 I was made Minister of State for External Affairs in the government of Prime Minister Atal Bihari Vajpayee. In 1999 I was made Minister of State with independent charge of Small Industries and Agro & Rural Industries, Department of Personnel & Training, Department of Pension & Pensioners' Welfare, Department of Personnel & Public Grievances and Pension Ministry, Department of Atomic Energy and Department of Space.
10. In 2002, I stood down as Minister of State and was appointed President of the BJP in Rajasthan. In December 2003 I led the party to a record landslide victory in the Rajasthan state elections, defeating the Congress Party and ousting their incumbent Chief Minister, Ashok Gehlot. On 8 December 2003, I was sworn in as the first female Chief Minister of Rajasthan.

11. I had known Lalit Modi long before my election as Chief Minister. The Modi family and my family have been close for many decades. Lalit had always been particularly interested in cricket and had ambitions of modernising cricket. It was something that he had discussed with me over a long period before my election. Once I was elected, amongst many other things, I decided that sports should be brought on to the agenda of the Rajasthan government. Remembering Lalit's particular interest in cricket, I asked him to help me with sports reform in Rajasthan.
12. Those reforms started by the implementation of a regulatory framework for the administration of sports in Rajasthan. In the course of working on those reforms, Lalit broke up many of the old, clan-based strangleholds and politicised structures that had held cricket back for so many years in India. Lalit recognised the huge commercial potential of cricket and set about releasing that potential. The results were astonishing and I credit Lalit for having revolutionised cricket in both Rajasthan and later, across the whole of India. By leading this revolution from Rajasthan during my tenure as Chief Minister, Lalit became widely recognised as someone closely associated with me.
13. In December 2008 the BJP was narrowly defeated by the Congress Party in the State elections for Rajasthan. Ashok Ghelot was appointed Chief Minister for a second time. Lalit was one of my main supporters during the 2008 election campaign. Our close working relationship and association was public knowledge.
14. A significant part of the Congress Party's election campaign was devoted to the propagation of a smear campaign against me and Lalit – they made numerous unfounded allegations of corruption during my time as Chief Minister. By this time, Lalit had become a household name in India and indeed, across the sporting world, following the phenomenal success of the inaugural Indian Premier League ("IPL"). Lalit's success was viewed, by many of the cricketing and political old guard within the Congress Party, with great jealousy and animosity. By this point, whether he liked it or not, Lalit had been painted as a pro-BJP, anti-Congress Party figure.

15. After my defeat, the new Congress government set up the Mathur Commission to investigate the allegations of corruption during my tenure. This Commission however was struck down by the Rajasthan High Court as wholly unlawful. The Court found that the government's motives for setting up the commission were not *bona fide*. The decision of the High Court was upheld by the Supreme Court of India.
16. Soon after my defeat, Lalit was literally hounded out of Rajasthan cricket by pro-Congress Party figures. Throughout 2009 and 2010 Lalit also found himself accused in a procession of ridiculous criminal cases in Rajasthan. I have no doubt whatsoever that these cases were instigated with the active or tacit support of the ruling Congress Party in Rajasthan, as a means of continuing the smear campaign against Lalit and by association, me.

17. Given my family's long history in public and political life in India, our involvement with the BJP from its inception, and due to my position of importance within the BJP in Rajasthan, I am a key political target as far as the Congress Party are concerned. Rajasthan is regarded as a key state within the context of national Indian politics. With Indian politics becoming increasingly regionalised, the two main political parties, the BJP and the Congress Party, are seeing their popularity decline in many states in southern India. Against that backdrop, there are 7 or 8 key states¹ across Northern and Central India in which the BJP and Congress Party remain the main political forces – these are often called the 'Hindi heartland' states. These states contain almost half of India's entire population. Rajasthan, which is the largest state by land mass in India, with a population of nearly 70 million people, is one of the most important of those states and the retention of political control of Rajasthan, at both State and national level, is key to any party which has aspirations to be in central government. It should be noted that the Rajasthan State elections and the Indian parliamentary elections are on an almost identical cycle – the next Rajasthan State elections will be in December 2013, and the next Indian parliamentary elections will be in spring 2014.

¹ There are 28 states in the Indian federation.

18. The current Indian government is formed by the United Progressive Alliance ("UPA"), which is a coalition of 10 political parties, of which the Congress Party is by far the largest. It was formed soon after the 2004 Indian parliamentary elections and was also the ruling coalition which won the 2009 elections. However, the popularity of the coalition is now severely waning; taken along with the inevitable anti-incumbency factor, there is a real prospect that the UPA and therefore the Congress Party will be out of government following the Indian parliamentary elections in 2014. In the fight to try and stave off such an outcome, the Congress Party sees the retention of Rajasthan at the State level as key to preserving its power within central government – this is particularly so, given the closeness of the electoral cycles. Victory in the last three state elections in Rajasthan has oscillated between the Congress Party and the BJP. If Rajasthan State returns to a BJP government in December 2013, it is highly likely that the majority of Lok Sabha seats in Rajasthan will also go to the BJP in the parliamentary elections in spring 2014 – this would be a devastating blow to the Congress Party's desire to retaining power at the centre of Indian politics.

19. For all of those reasons, Lalit's close connection to me has resulted in huge animosity towards him from the Congress Party, both at the Rajasthan and the national levels. The political attack which is currently underway against Lalit in India, is in my opinion, designed to destroy Lalit's reputation, to keep him out of Rajasthan cricket and politics and to thereby discredit me. I am further aware that Lalit, in the context of his role as IPL founder and Chairman, has also had major run-ins with prominent central government Congress Party ministers – I will not comment upon those conflicts as they have never involved me directly. What is clear, however, is that they have only served to exacerbate Lalit's difficulties with the ruling Congress Party.

20. Given my close understanding of, and involvement in, Indian politics, I have absolutely no doubt that the broad, full frontal attack that Lalit is currently facing in India is politically motivated. Certain elements within Indian politics seek to preserve their own interests by exacting revenge on political opponents. This is exactly the motive that is guiding the attack on Lalit at the moment in India. By destroying and discrediting Lalit, the Congress Party hope to remove one of my key supporters from

the political scene; in the course of doing so, by virtue of my association with IAP, they hope to politically discredit me as well.

21. I gave this statement in English. I confirm that the information contained in this witness statement is true, correct and accurate to the best of my knowledge and belief.

SIGNED:

Vasundhara Rajé

VASUNDHARA RAJE

DATED:

18/08/2011

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