

To members of the SINGAPORE GUN CLUB

Fellow Members,

It's been a month since the National Shooting Centre was closed by Sport Singapore. The SGC management and your representatives in the SSA are doing all they can to assist SportSG in its efforts to re-open the NSC. A Police investigation is ongoing so information is limited. I will present only what is known to us as they relate to SGC and SSA.

It is important to note that when the NSC was closed on February 6th;

1. The SGC armoury was fully compliant with PLRD's latest security requirements.
2. All weapons in SGC's armoury were fully accounted for.
3. The SRA armoury was NOT compliant. SRA had not installed a new vault door meeting new PLRD requirements nor had it installed an issuing window as PLRD had mandated.

The events surrounding the closure of the national Shooting Centre are as follows:

Tuesday February 2<sup>nd</sup> Police Licensing and Regulatory Division (PLRD) conducted an inspection/audit of SRA and SGC Armouries. After the inspection, PLRD sealed both armouries.

Thursday February 4<sup>th</sup> PLRD returned with a large force and confiscated 77 weapons from both SRA and SGC armouries. Two were confiscated from SGC's armoury and 75 weapons were confiscated from SRA's armoury.

In SGC's case, one shotgun belonged to an ex-SAFRA member who had not paid the license fee and the gun was deemed 'unlicensed'. The other belonged to an SGC member whose license fee was unpaid and was also deemed unlicensed. PLRD was aware of the SAFRA gun and we have email correspondence from PLRD to SAFRA and SGC asking SGC to hang on to the weapons.

PLRD chose to confiscate both weapons.

Saturday February 6<sup>th</sup> An emergency meeting was called by the CEO of Sport Singapore in SportSG offices at 10.00am. I rushed back from Australia when I learned of the confiscation and attended the meeting with SGC Sec.Gen Tang Kee Kong. Attendees were SportSG, SSA, SGC and PLRD. SRA was invited but did not attend.

At the meeting, CEO informed SSA that Sport Singapore was revoking the SSA-SportSG Lease and taking control of the NSC. At 1.00pm on Saturday, the NSC was closed indefinitely. The range would be open to the National Team the following week.

Only National Team members would be allowed to enter the NSC. SGC was allowed to operate the upstairs armoury for the National Team.

Wednesday Feb. 10<sup>th</sup> The Police investigation/audit continued and SGC was cleared in the late afternoon.

Friday February 12<sup>th</sup> PLRD cancelled SRA and SGC Armoury Licenses.

The armoury license for all three armouries in the NSC was issued to SSA. SSA is now the sole license holder of all armouries in the NSC.

SportSG appointed SSA as the manager of the NSC. Sport Singapore has been working with SSA to get the NSC re-opened.

NOTE: In Mid 2015, SSA Council voted to upgrade the NSC security system to meet the increasing security threats facing Singapore and the world. The plan required a central armoury system whereby all arms would be stored in the upstairs armoury whilst all ammunition would be stored in the basement armouries. SGC agreed to comply but SRA refused and a legal battle to stop SSA from implementing the Central Armoury system is ensuing in the courts.

I have reason to believe that this special audit was prompted by the circulation of photograph(s) showing SRA members brandishing assault rifles over social media (possibly SRA's Facebook).

SportSG, MCCY and certain Minister(s) have directed that such weapons must not be permitted in The National Shooting Centre. SportSG will be issuing a policy ruling that will prohibit the use or Storage of assault rifles (or lookalikes) in the NSC.

#### **SINGAPORE POLICE FORCE STATEMENT (ST March 8<sup>th</sup> 2016)**

*"On Feb 2, the Police Licensing & Regulatory Department (PLRD) conducted an arms audit at the Armouries of the SGC and SRA. Due to serious licensing irregularities, the police took possession of a number of arms. Police investigations are ongoing."*

The sheer magnitude of "licensing Irregularities" which previous annual audits by the PLRD did not detect, has prompted the Police to require the construction of new security fences, installation of metal detectors, and a gamut of security equipment which must be operational before the NSC will be allowed to re-open.

When the NSC re-opens, it will not be 'business as usual'. Through no fault of our own, SGC members will have to live with new policies, rules and procedures.

We will update you as soon as we have more information to share with you.

Michael Vaz

**IN THE HIGH COURT OF THE REPUBLIC OF SINGAPORE**

Case No.: HC/S 622/2016

Filed: 14-June-2016 04:22 PM

Hearing Date : 21-July-2016

Hearing Time : 2:30 PM

Hearing Type : Pre-Trial Conference

Attend Before: Registrar

Between

SINGAPORE RIFLE ASSOCIATION  
(Singapore UEN No. S62SS0045K)

...Plaintiff(s)

And

MICHAEL VAZ LORRAIN  
(NRIC No. S0158493F)

...Defendant(s)



**WRIT OF SUMMONS**

To:

MICHAEL VAZ LORRAIN  
1E Tanglin Hill Singapore 248023

THIS WRIT OF SUMMONS has been issued against you in respect of the claim endorsed herein.

You must:

1. satisfy the claim; or
2. enter an appearance,

within 8 days after the service of this Writ, failing which, the Plaintiff(s) may proceed with the action and enter judgment against you without further notice.

THIS WRIT OF SUMMONS is issued by the solicitors for the Plaintiff(s) whose particulars are as below.  
The address(es) of the Plaintiff(s) is/are 990 OLD CHOA CHU KANG ROAD Singapore 699814.

Solicitor(s) for the Plaintiff(s)

DREW & NAPIER LLC  
10 Collyer Quay #10-01 Ocean Financial Centre  
Singapore 049315  
Tel No.: 65350733  
Fax No.: 65354906  
File Ref No.: WW/GGHP/DTYY/LYJ/417228

Solicitor in charge: 1. WONG HIN PKIN WENDELL ,  
2. GOH HUI PING, GERALDINE,  
3. TEO YING YING DENISE (ZHANG YINGYING)  
4. LIM YAO JUN



HC 5622 2016 HJ 8622 2016 HC 5522 2016 HC 8422 2016 HC 5622 2016 HC 8622 2016

VINCENT HOONG  
REGISTRAR  
SUPREME COURT  
SINGAPORE

### STATEMENT OF CLAIM

Please see attached Statement of Claim.

**Note:**

1. This writ may not be served more than 6 calendar months after the above date unless renewed by order of the Court.
2. To defend the claim, the Defendant(s) must enter an appearance(s) using the electronic filing service either personally or by a solicitor at the Registry of the SUPREME COURT and notify the (Plaintiff(s) / Plaintiff's solicitors) accordingly within 8 days after service hereof, otherwise judgment may be entered against him without further notice.
3. Where the Defendant enters an appearance, he must also serve a defence on the solicitor for the Plaintiff within 14 days after the last day of the time limited for entering an appearance; otherwise judgment may be entered against him without further notice.

**IN THE HIGH COURT OF THE REPUBLIC OF SINGAPORE**

HC/S /2016

Between

**SINGAPORE RIFLE ASSOCIATION**  
(Singapore UEN No. S62SS0045K)

...Plaintiff

And

**MICHAEL VAZ LORRAIN**  
(NRIC No. S0158493F)

...Defendant

**STATEMENT OF CLAIM**

**I. PARTIES**

1. According to the Singapore Shooting Association's ("**SSA**") website, the SSA is the national authority for the sport of shooting in Singapore. Under SSA's constitution, its objects include promoting the sport of shooting, organising and managing shooting championships and related shooting competitions in Singapore and coordinating, regulating, advising and administering all matters relating to the shooting sport.

2. The Plaintiff, the Singapore Rifle Association ("**SRA**"), is a registered society under the Societies Act (Cap. 311). The Plaintiff is also a member of SSA.

3. The Singapore Gun Club ("**SGC**") is a registered society under the Societies Act (Cap. 311). The SGC is also a member of SSA. The SGC has a website at <[www.singaporegunclub.com](http://www.singaporegunclub.com)> ("**SGC's Website**") on the Internet.

4. At all material times, the SGC's Website had been, and still is, open to general access by any user of the Internet.

5. The Defendant is the President of SSA's Council. The Defendant is also the President of SGC's Committee.

## II. THE DEFAMATORY WORDS

6. On or about 11 March 2016 at 15:50 hours, the Defendant published and/or caused to be published a written statement regarding the closure of the National Shooting Centre ("**1<sup>st</sup> Statement**"). The 1<sup>st</sup> Statement was circulated to the members of SGC by way of a document entitled "SGC March 11<sup>th</sup> 2016 – Note to SGC Members.pdf" ("**Document**") attached in an email captioned "SGC President's Message to Club Members", from the email address <[info@singaporegunclub.com](mailto:info@singaporegunclub.com)> to the email address <[info@singaporegunclub.com](mailto:info@singaporegunclub.com)>. The Defendant was the author of the Document.

7. On or about 12 March 2016, the Defendant further published and/or caused to be published an announcement entitled "President Message to Members" ("**Announcement**") on SGC's Website with an address at <<http://www.singaporegunclub.com/portal/announcements/>> ("**2<sup>nd</sup> Statement**"). The Defendant was the author of the Announcement. The address of SGC's

Website <<http://www.singaporegunclub.com>> is published on the Facebook profile belonging to "Singapore Gun Club" until at least the time of the filing of this Statement of Claim.

8. At the relevant times, the Internet had millions of users all of whom had free and open access to the Announcement. Facebook is a social media platform on the Internet which is commonly relied on as a source of information. It can be inferred that a large but unquantifiable number of users in Singapore and around the world had read the Announcement.

9. The content of the 1<sup>st</sup> Statement and the 2<sup>nd</sup> Statement are substantially similar. Both the 1<sup>st</sup> Statement and the 2<sup>nd</sup> Statement contained words defamatory of the Plaintiff, as set out below ("**Words**").

10. The 1<sup>st</sup> Statement reads as follows:

*To members of the SINGAPORE GUN CLUB*

*Fellow Members,*

*It's been a month since the National Shooting Centre was closed by Sport Singapore. The SGC management and your representatives in the SSA are doing all they can to assist SportSG in its efforts to re-open the NSC. A Police investigation is ongoing so information is limited. I will present only what is known to us as they relate to SGC and SSA.*

*It is important to note that when the NSC was closed on February 6th;*

*1. The SGC armoury was fully compliant with PLRD's latest security requirements.*

*2. All weapons in SGC's armoury were fully accounted for.*

*3. The SRA armoury was NOT compliant. SRA had not installed a new vault door meeting new PLRD requirements nor had it installed an issuing window as PLRD had mandated.*

The events surrounding the closure of the national Shooting Centre are as follows:

- Tuesday February 2nd*      *Police Licensing and Regulatory Division (PLRD) conducted an inspection/audit of SRA and SGC Armouries. After the inspection, PLRD sealed both armouries.*
- Thursday February 4th*      *PLRD returned with a large force and confiscated 77 weapons from both SRA and SGC armouries. Two were confiscated from SGC's armoury and 75 weapons were confiscated from SRA's armoury.*
- In SGC's case, one shotgun belonged to an ex-SAFRA member who had not paid the license fee and the gun was deemed 'unlicensed'. The other belonged to an SGC member whose license fee was unpaid and was also deemed unlicensed. PLRD was aware of the SAFRA gun and we have email correspondence from PLRD to SAFRA and SGC asking SGC to hang on to the weapons.*
- PLRD chose to confiscate both weapons.*
- Saturday February 6th*      *An emergency meeting was called by the CEO of Sport Singapore in SportSG offices at 10.00am. I rushed back from Australia when I learned of the confiscation and attended the meeting with SGC Sec.Gen Tang Kee Kong. Attendees were SportSG, SSA, SGC and PLRD. SRA was invited but did not attend.*
- At the meeting, CEO informed SSA that Sport Singapore was revoking the SSA-SportSG Lease and taking control of the NSC. At 1.00pm on Saturday, the NSC was closed indefinitely. The range would be open to the National Team the following week.*
- Only National Team members would be allowed to enter the NSC. SGC was allowed to operate the upstairs armoury for the National Team.*



Wednesday Feb. 10th      *The Police investigation/audit continued and SGC was cleared in the late afternoon.*

Friday February 12th      *PLRD cancelled SRA and SGC Armoury Licenses.*

*The armoury license for all three armouries in the NSC was issued to SSA. SSA is now the sole license holder of all armouries in the NSC.*

*SportSG appointed SSA as the manager of the NSC. Sport Singapore has been working with SSA to get the NSC re-opened.*

*NOTE: In Mid 2015, SSA Council voted to upgrade the NSC security system to meet the increasing security threats facing Singapore and the world. The plan required a central armoury system whereby all arms would be stored in the upstairs armoury whilst all ammunition would be stored in the basement armouries. SGC agreed to comply but SRA refused and a legal battle to stop SSA from implementing the Central Armoury system is ensuing in the courts.*

*I have reason to believe that this special audit was prompted by the circulation of photograph(s) showing SRA members brandishing assault rifles over social media (possibly SRA's Facebook).*

*SportSG, MCCY and certain Minister(s) have directed that such weapons must not be permitted in The National Shooting Centre. SportSG will be issuing a policy ruling that will prohibit the use or Storage of assault rifles (or lookalikes) in the NSC.*

#### **SINGAPORE POLICE FORCE STATEMENT (ST March 8th 2016)**

"On Feb 2, the Police Licensing & Regulatory Department (PLRD) conducted an arms audit at the Armouries of the SGC and SRA. Due to serious licensing irregularities, the police took possession of a number of arms. Police investigations are ongoing."

*The sheer magnitude of "licensing Irregularities" which previous annual audits by the PLRD did not detect, has prompted the Police to require the construction of new security fences, installation of metal detectors, and a gamut of security equipment which must be operational before the NSC will be allowed to re-open.*

When the NSC re-opens, it will not be 'business as usual'. Through no fault of our own, SGC members will have to live with new policies, rules and procedures.

We will update you as soon as we have more information to share with you.

Michael Vaz

[Emphasis added in underline]

11. The 2<sup>nd</sup> Statement reads as follows:

*President Message to Members*

To members of the **SINGAPORE GUN CLUB (SGC)**

*Fellow Members,*

*It's been a month since the **National Shooting Centre (NSC)** was closed by Sport Singapore. The SGC management and your representatives in the Singapore Shooting Association (SSA) are doing all they can to assist SportSG in its efforts to re-open the NSC. A Police investigation is ongoing so information is limited. I will present only what is known to us as they relate to SGC and SSA.*

*It is important to note that when the NSC was closed on February 6th;*

- 1. The SGC armoury was fully compliant with **Police Licensing & Regulatory Department (PLRD)**'s latest security requirements.*
- 2. All firearms in SGC's armoury were fully accounted for.*
- 3. The Singapore Rifle Association (SRA)'s armoury was NOT compliant. SRA had not installed a new vault door meeting new PLRD requirements nor had it installed an issuing window as PLRD had mandated.*

*The events surrounding the closure of the National Shooting Centre are as follows:*

*Tuesday February 2<sup>nd</sup> PLRD conducted an inspection/audit of SRA and SGC Armouries. After the inspection, PLRD sealed both armouries.*

*Thursday February 4<sup>th</sup> PLRD returned with a large force and confiscated 75 firearms from SRA armoury and 2 firearms from SGC armoury.*

*In SGC's case, one shotgun belonged to an ex-SAFRA member who had not paid the license fee and the gun was deemed 'unlicensed'. The other belonged to an SGC member whose license fee was unpaid and was also deemed unlicensed. PLRD was aware of the SAFRA member's shotgun and we have email correspondences from PLRD to SAFRA and SGC instructing SGC to hang on to the firearms. PLRD chose to confiscate both firearms.*

*Saturday February 6<sup>th</sup> An emergency meeting was called by the CEO of Sport Singapore in SportSG office at 10.00am. I rushed back from Australia when I learned of the confiscation and attended the meeting with SGC Hon Secretary, Mr Tang Kee Kong. Attendees were SportS, SSA, SGC and PLRD. SRA was invited but did not attend.*

*At the meeting, CEO informed SSA that Sport Singapore was revoking the SSA-SportSG Lease and taking control of the NSC at 1.00pm on Saturday, the NSC was closed indefinitely. The range would be open to the National Team the following week.*

*Only National Team members would be allowed to enter the NSC. SGC was allowed to operate the upstairs armoury for the National Team.*

*Wednesday Feb. 10<sup>th</sup> The Police investigation/audit continued and SGC was cleared in the late afternoon.*

*Friday February 12<sup>th</sup> PLRD cancelled SRA and SGC Armoury Licenses. The armoury license for all three armouries in the NSC was issued to SSA.*

*SSA is now the sole license holder of all armouries in the NSC. SportSG appointed SSA as the manager of the NSC. Sport Singapore has been working with SSA to get the NSC re-opened.*

*NOTE: In Mid 2015, SSA Council voted to upgrade the NSC security system to meet the increasing security threats facing Singapore and the world. The plan required a central armoury system whereby all arms would be stored in the upstairs armoury whilst all ammunition would be stored in the basement armouries. SGC agreed to comply but SRA*

*refused and a legal battle to stop SSA from implementing the Central Armoury system is ensuing in the courts. Singapore Law Watch – Shooting groups in legal dispute over armoury*

*I have reason to believe that this special audit was prompted by the circulation of photograph(s) showing SRA members brandishing assault rifles over social media (possibly SRA's Facebook).*

*SportSG, MCCY and certain Minister(s) have directed that such weapons must not be permitted in The National Shooting Centre. SportSG will be issuing a policy ruling that will prohibit the use or storage of assault rifles (or lookalikes) in the NSC.*

#### **SINGAPORE POLICE FORCE STATEMENT (ST March 8<sup>th</sup> 2016)**

“On Feb 2, the Police Licensing & Regulatory Department (PLRD) conducted an arms audit at the Armouries of the SGC and SRA. Due to serious licensing irregularities, the police took possession of a number of arms. Police investigations are ongoing.”

*The sheer magnitude of “licensing Irregularities” which previous annual audits by the PLRD did not detect, has prompted the Police to require the construction of new security fences, installation of metal detectors, and a gamut of security equipment which must be operational before the NSC will be allowed to re-open.*

*When the NSC re-opens, it will not be ‘business as usual’. Through no fault of our own, SGC members will to have to live with new policies, rules and procedures.*

*We will update you as soon as we have more information to share with you.*

*Michael Vaz  
President  
Singapore Gun Club*

[Emphasis added in underline]

12. The 2<sup>nd</sup> Statement was transmitted and/or caused to be transmitted and published by the Defendant on the Internet until at least the time of the filing of this Statement of Claim.

13. On or about 12 March 2016, the Words were republished on the Internet by way of a download link for a document being posted on a public Facebook group by the name of "Singapore Gun Club" found at address <<https://www.facebook.com/groups/48041761605/>>. The document, when downloaded, contains the Words as set out in the 1<sup>st</sup> Statement. On or about 12 March 2016, this post (containing the download link) was publicly shared on the Facebook profile of "James Blackmore" found at address <<https://www.facebook.com/james.blackmore/>>. These posts remained accessible to the users of the Internet until at least the time of the filing of this Statement of Claim.

### III. MEANING

14. The Words expressly referred to and were understood to refer to the Plaintiff, i.e. SRA.

15. In their natural and ordinary meaning, the Words mean and/or are understood to mean that:

- (a) One of the reasons the National Shooting Centre was shut down was because the Plaintiff had deliberately failed or refused to comply with

Police Licensing & Regulatory Department (“PLRD”) requirements to install a new vault door and to install an issuing window.

- (b) The Plaintiff was cavalier and unconcerned with the events leading to the closure of the National Shooting Centre, when the Plaintiff was invited but deliberately chose not to attend the emergency meeting called by the CEO of Sport Singapore on 6 February 2016.
- (c) The audit of the armouries at the National Shooting Centre was prompted by the Plaintiff publishing on social media, such as the Plaintiff’s Facebook page, photograph(s) of its members “brandishing assault rifles”.
- (d) Sport Singapore, Ministry of Culture Community and Youth as well as certain Ministers in the government had directed that assault rifles (or lookalikes) were not permitted in the National Shooting Centre; and that the Plaintiff had flouted such directives by permitting the same to be used or stored at the National Shooting Centre.
- (e) The Police’s imposition of additional measures such as the construction of new security fences, installation of metal detectors, etc. was prompted by the licensing issues in respect of the weapons that the Police had taken possession of and which were previously stored in the Plaintiff’s armoury.
- (f) The Plaintiff is entirely to blame for the closure of the National Shooting Centre.

16. Further and/or alternatively, the Words alleged that the Plaintiff is guilty of criminal misconduct, namely, contravening the applicable armoury licensing rules and the applicable security requirements.

17. By reason of the publication and circulation of the Words as pleaded above in paragraphs 9 to 13, the Plaintiff has suffered grave injury to its reputation.

18. On 7 June 2016, the Plaintiff, through its solicitors, issued a letter of demand to the Defendant demanding that the Defendant:

- (a) publish, at the Defendant's own expense, an apology and undertaking in terms of the Plaintiff's draft, which was enclosed;
- (b) compensate the Plaintiff by way of damages; and
- (c) agree to indemnify the Plaintiff in respect of the costs incurred in connection with this matter.

19. The Defendant failed and/or refused to comply with the Plaintiff's demand.

20. Unless restrained, the Defendant will further publish or cause to be published the same or similar words defamatory of the Plaintiff.

**AND THE PLAINTIFF CLAIMS:-**

- (1) Damages to be assessed;
- (2) An injunction restraining the Defendant, whether by himself, his servants, agents, or otherwise howsoever, from publishing or causing to be published the Words or similar words defamatory of the Plaintiff, in any manner whatsoever;
- (3) Costs; and
- (4) Such other and further relief as this Honourable Court deems fit.

Dated this 14<sup>th</sup> day of June 2016

A handwritten signature in black ink, appearing to read "Drew & Napier", with a horizontal line underneath it.

**Drew & Napier LLC  
Solicitors for the Plaintiff**





General Line  
T : +65 6535 0733  
T : +65 9726 0573 (After Hours)  
F : +65 6535 4906

Drew & Napier LLC  
10 Collyer Quay  
#10-01 Ocean Financial Centre  
Singapore 049315

[www.drewnapier.com](http://www.drewnapier.com)

*We do not accept service  
of court documents by fax*

T : +65 6531 2496 / 2319  
E : [wendell.wong@drewnapier.com](mailto:wendell.wong@drewnapier.com)  
[yaojun.lim@drewnapier.com](mailto:yaojun.lim@drewnapier.com)

Our Ref  
WW/GGHP/DTYY/LYJ/417228/sl

Your Ref

7 June 2016

**PRIVATE AND CONFIDENTIAL:  
TO BE OPENED BY ADDRESSEE ONLY**

**BY EMAIL ([michaelvaz@claredon.com.sg](mailto:michaelvaz@claredon.com.sg)) & HAND**  
No. of page(s) : 3 + Enclosure

Mr Michael Vaz Lorrain  
1E Tanglin Hill  
Singapore 248023

Dear Mr Vaz

#### DEFAMATION

1. We act for Singapore Rifle Association.
2. You have published or caused to be published a written statement regarding the closure of the National Shooting Centre ("**Statement**"). Among others, the Statement was (i) published on the Singapore Gun Club's website (<http://www.singaporegunclub.com>); and (ii) circulated to the members of the Singapore Gun Club by way of an email captioned "SGC President's Message to Club Members", sent on 11 March 2016, 15:50 hours from the email address [info@singaporegunclub.com](mailto:info@singaporegunclub.com) >.
3. The Statement contained the following ("**Words**") of and about our client:-
  - (a) In the Statement, you refer to the closure of the National Shooting Centre by Sport Singapore. You then go on to state that when the National Shooting Centre was closed on 6 February 2016, that *"The SRA armoury was NOT compliant. SRA had not installed a new vault door meeting new PLRD requirements nor had it installed an issuing window as PLRD had mandated."*
  - (b) You then go on to state the "events surrounding the closure of the National Shooting Centre" from 2 February to 12 February 2016:
    - (i) In respect of the events that you say occurred on 4 February 2016, you state that: *"PLRD returned with a large force and confiscated 77 weapons from both SRA and SGC armouries. Two were confiscated from SGC's armoury and 75 weapons were confiscated from SRA's armoury."*

---

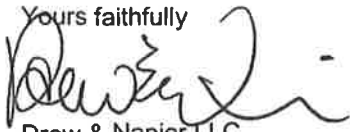
DREW & NAPIER LLC (UEN 200102509E) is a law corporation with limited liability.

This document is for the addressee(s) only and may contain confidential information and/or may be subject to legal privilege.  
If you have received this in error, please contact us immediately.

- 
- (ii) In respect of the events that you say occurred on 6 February 2016, you state that "An emergency meeting was called by the CEO of Sport Singapore in SportSG offices at 10.00am... SRA was invited but did not attend."
- (c) After setting out the events from 2 to 12 February 2016, you go on to state that: "I have reason to believe that this special audit was prompted by the circulation of photograph(s) showing SRA members brandishing assault rifles over social media (possibly SRA's Facebook)" and "SportSG, MCCY and certain Minister(s) have directed that such weapons must not be permitted in The National Shooting Centre. SportSG will be issuing a policy ruling that will prohibit the use or Storage of assault rifles (or lookalikes) in the NSC."
- (d) You go on to quote part of the Singapore Police Force's statement on the ongoing investigations regarding the arms audit at the National Shooting Centre: "On Feb 2, the Police Licensing & Regulatory Department (PLRD) conducted an arms audit at the Armouries of the SGC and SRA. Due to serious licensing irregularities, the police took possession of a number of arms. Police investigations are ongoing."
- (e) You then go on to state that: "The sheer magnitude of "licensing Irregularities" which previous annual audits by the PLRD did not detect, has prompted the Police to require the construction of new security fences, installation of metal detectors, and a gamut of security equipment which must be operational before the NSC will be allowed to re-open. When the NSC re-opens, it will not be 'business as usual'. Through no fault of our own, SGC members will have to live with new policies, rules and procedures."
4. The Words and the Statement mean and are understood to mean that:
- (a) One of the reasons the National Shooting Centre was shut down was because our client had deliberately failed or refused to comply with PLRD requirements to install a new vault door and to install an issuing window.
- (b) Our client was cavalier and unconcerned with the events leading to the closure of the National Shooting Centre, when our client was invited but deliberately chose not to attend the emergency meeting called by the CEO of Sport Singapore on 6 February 2016.
- (c) The audit of the armouries at the National Shooting Centre was prompted by our client publishing on social media, such as our client's Facebook page, photograph(s) of its members "brandishing assault rifles".
- (d) Sport Singapore, Ministry of Culture Community and Youth as well as certain Ministers in the government had directed that "assault rifles (or lookalikes) were not permitted in the National Shooting Centre; and that our client had flouted such directives by permitting the same to be used or stored at the National Shooting Centre.
- (e) The Police's imposition of additional measures such as the construction of new security fences, installation of metal detectors etc. was prompted by the licensing issues in respect of the weapons that the Police had taken possession of and which were previously stored in our client's armoury.
- (f) Our client is entirely to blame for the closure of the National Shooting Centre.
5. These are false and baseless allegations and constitute a serious libel against our client. Your actions have resulted in serious and irreparable injury to our client's good name and reputation.
6. It is clear that the Statement was published maliciously.
7. In the premises, our client requires you to:
- (a) Immediately remove the Statement from Singapore Gun Club's website (at <http://www.singaporegunclub.com>);

- 
- (b) Publish, at your own expense and within seven (7) days, an apology and undertaking in terms of the draft which is enclosed. The apology and undertaking is to be published without any amendment with prominence on the homepage of the Singapore Gun Club's website (at <http://www.singaporegunclub.com>). The said apology and undertaking are to remain on Singapore Gun Club's website for the same number of days that the Statement remained on it;
- (c) Circulate the said apology and undertaking to all members of the Singapore Gun Club by way of email;
- (d) Compensate our client by way of damages; and
- (e) Agree to indemnify our client in respect of the costs and expenses which it will have incurred in connection with this matter.
8. Our client requires your written confirmation that you will comply with these conditions, as well as your offer of damages, within five (5) days from the date of this letter, failing which our client will be compelled to protect its interest and seek its legal remedies.
9. All our client's rights are expressly reserved.

Yours faithfully



Drew & Napier LLC  
(Wendell Wong / Lim Yao Jun)

Enc

Cc client

## APOLOGY

1. On or about 11 March 2016, I published or caused to be published a Statement ("Statement") regarding the closure of the National Shooting Centre. Among others, the Statement was published on the Singapore Gun Club's website and circulated to the members of the Singapore Gun Club by email.

2. The Article contained the following words ("Words") of and about the Singapore Rifle Association ("SRA"):-

- (a) In the Statement, I refer to the closure of the National Shooting Centre by Sport Singapore. I then go on to state that when the National Shooting Centre was closed on 6 February 2016, that *"The SRA armoury was NOT compliant. SRA had not installed a new vault door meeting new [Police Licensing & Regulatory Department or "PLRD"] requirements nor had it installed an issuing window as PLRD had mandated."*
- (b) I then go on to state the "events surrounding the closure of the National Shooting Centre" from 2 February to 12 February 2016:
  - (i) In respect of the events that I say occurred on 4 February 2016, I stated that: *"PLRD returned with a large force and confiscated 77 weapons from both SRA and SGC armouries. Two were confiscated from SGC's armoury and 75 weapons were confiscated from SRA's armoury."*
  - (ii) In respect of the events that I say occurred on 6 February 2016, I state that *"An emergency meeting was called by the CEO of Sport Singapore in SportSG offices at 10.00am... SRA was invited but did not attend."*
- (c) After setting out the events from 2 to 12 February 2016, I go on to state that: *"I have reason to believe that this special audit was prompted by the circulation of photograph(s) showing SRA members brandishing assault rifles over social media (possibly SRA's Facebook)" and "SportSG, MCCY and certain Minister(s) have directed that such weapons must not be permitted in The National Shooting Centre. SportSG will be issuing a policy ruling that will prohibit the use or Storage of assault rifles (or lookalikes) in the NSC."*
- (d) I go on to quote part of the Singapore Police Force's statement on the ongoing investigations regarding the arms audit at the National Shooting Centre: *"On Feb 2, the Police Licensing & Regulatory Department (PLRD) conducted an arms audit at the Armouries of the SGC and SRA. Due to serious licensing irregularities, the police took possession of a number of arms. Police investigations are ongoing."*
- (e) I then go on to state that: *"The sheer magnitude of "licensing Irregularities" which previous annual audits by the PLRD did not detect, has prompted the Police to require the construction of new security fences, installation of metal detectors, and a gamut of security equipment which must be operational before the NSC will be allowed to re-open. When the NSC re-opens, it will not be 'business as usual'. Through no fault of our own, SGC members will to have to live with new policies, rules and procedures."*

3. I recognise that the Words and the Statement meant or were understood to mean that:

- (a) One of the reasons the National Shooting Centre was shut down was because SRA had deliberately failed or refused to comply with PLRD requirements to install a new vault door and to install an issuing window.

- (b) SRA was cavalier and unconcerned with the events leading to the closure of the National Shooting Centre, when SRA was invited but deliberately chose not to attend the emergency meeting called by the CEO of Sport Singapore on 6 February 2016.
- (c) The audit of the armouries at the National Shooting Centre was prompted by SRA publishing on social media, such as SRA's Facebook page, photograph(s) of SRA members "brandishing assault rifles".
- (d) Sport Singapore, Ministry of Culture Community and Youth as well as certain Ministers in the government had directed that "assault rifles (or lookalikes) were not permitted in the National Shooting Centre; and that SRA had flouted such directives by permitting the same to be used or stored at the National Shooting Centre.
- (e) The Police's imposition of additional measures such as the construction of new security fences, installation of metal detectors etc. was prompted by the licensing issues in respect of the weapons that the Police had taken possession of and which were previously stored in SRA's armoury.
- (f) SRA is entirely to blame for the closure of the National Shooting Centre.

4. I admit and acknowledge that the above allegations are false and completely without foundation. I unreservedly apologise to the Singapore Rifle Association for the injury to SRA's good name and reputation caused by these allegations. I undertake not to make further allegations to the same or similar effect.

5. I have agreed to pay SRA, by way of compensation, the sum of [\$ ], being the damages and costs incurred in connection with this matter.

Michael Vaz Lorrain

Date:



IN ASSOCIATION WITH CITILEGAL LLC  
LIMITED LIABILITY PARTNERSHIP REGISTRATION NO. T15LL0188A

ADVOCATES & SOLICITORS  
NOTARIES PUBLIC  
COMMISSIONERS FOR OATHS

1 COLEMAN STREET  
#10-07 THE ADELPHI  
SINGAPORE 179803

TEL : 6223 3227

FAX : 6224 0003

EMAIL : gen@bihlilee.com.sg

WEBSITE : WWW.BIHLILEE.COM

Writer's DID : 6330 6201  
Writer's Email : alee@bihlilee.com.sg  
Our Ref : AL/za/2016 000 316  
Your Ref : WW/GGHP/DTYJ/LYJ/417228/sl

10 June 2016

Drew & Napier LLC  
10 Collyer Quay  
#10-01 Ocean Financial Centre  
Singapore 049315

**BY FAX AND BY POST**  
Fax No.: 6535 4906

**Attn: Mr. Wendell Wong / Mr Lim Yao Jun**

Dear Sirs

### **ALLEGED DEFAMATION**

1. We act for Mr Michael Vaz and refer to your letter addressed to him dated 7 June 2016.
2. Our client categorically rejects your client's allegation that the message ("the Statement") posted by him on the Singapore Gun Club's website (<http://www.singaporeclub.com>) to members of Singapore Gun Club ("SGC") in his capacity as President of the SGC, pertaining to the closure of the National Shooting Centre, contain false and baseless allegations and constitute a serious libel against your client, the Singapore Rifle Association.
3. Our client further denies that the Statement means or is understood to bear the meanings set out in paragraph 4 of your letter. Even if the Statement bears or is capable of bearing the meanings alleged by your client, which is wholly denied, our client says that the same is NOT defamatory of your client and/or are statements of fact and/or constitute fair comment and/or are published on an occasion of qualified privilege.

---

Anthony Lee | Loh Wai Mooi | Gan Kam Yui | Tee Lee Lian

CONSULTANTS: Audrey Thng | Deanna Lim

Angelyn Cheng | Eu Li Lian | Joey Quek | Ho Shiao Hong | Wang Liansheng | Timothy Quek

LETTER  
TO Drew & Napier LLC

SHEET  
NO. 2

DATE  
10 June 2016

4. Further, our client is of the view that it was his duty as President of SGC to inform SGC members of the events leading up to the sudden seizure of weapons and closure of the National Shooting Centre.
5. In any event, our client denies that the Statement was published maliciously.
6. Your client's allegation that the Statement has resulted in serious and irreparable injury to your client's allegedly good name and reputation is denied.
7. In the circumstances, our client wholly rejects your client's demands and shall vigorously defend any subsequent proceedings in respect of this matter.
8. Please note that we have instructions to accept service of process on behalf of our client. All our client's rights are reserved.

Yours faithfully

*Binli Lee*

BIH LI & LEE LLP  
c.c. client