

EXHIBIT B

----- Forwarded message -----

From: **Blackstock, Patrisha@DCA** <Patrisha.Blackstock@dca.ca.gov>
Date: Monday, August 24, 2020
Subject: Request for Arbitration
To: "jojotheboxer@gmail.com" <jojotheboxer@gmail.com>
Cc: "Cornejo, Sophia@DCA" <Sophia.Cornejo@dca.ca.gov>

RE: REQUEST FOR ARBITRATION – Heredia/Diaz

Dear Mr. Diaz,

The California State Athletic Commission (Commission) has received a Request for Arbitration dated September 20, 2020, from Mr. Moses Heredia. Pursuant to the California Code of Regulations section 227 below, you have **twenty (20) calendar** days to respond to this arbitration request.

§ 227. Arbitration Procedures.

(b) Within five (5) working days after receipt of a complete request for arbitration, the commission shall serve the request and any accompanying documents on the other party to the contract and provide that party with an opportunity to respond. If the commission does not receive a response from the other party not later than twenty (20) calendar days from the date of service of the request, the matter shall proceed by default.

Your response will be accepted via email, fax or mail. Please contact the Commission at (916) 263-2195 or via email at csac@dca.ca.gov if you have any questions regarding this Request for Arbitration or its associated contract.

Sincerely,

Patrisha Blackstock

Associate Governmental Program Analyst

California State Athletic Commission

[2005 Evergreen St., Suite 2010](#)

[Sacramento, CA 95815](#)

Patrisha.blackstock@dca.ca.gov

P: 916-263-2195 (Main Line)

P: 916-263-6130 (Direct Line)

F: 916-263-2197



BUSINESS, CONSUMER SERVICES, AND HOUSING AGENCY • GOVERNOR EDMUND G. BROWN JR.

CALIFORNIA STATE ATHLETIC COMMISSION

2005 Evergreen Street, Suite 2010 | Sacramento, California 95815

Phone: (916) 263-2195 Fax: (916) 263-2197

Website: www.dca.ca.gov/csac Email: CSAC@dca.ca.gov



REQUEST FOR ARBITRATION

This request is to be forwarded to the Commission office and the Office of the Attorney General at 300 South Spring Street Suite 5212 Los Angeles, California 90013. You must turn in a copy of the contract over which Arbitration is sought. If you do not have a copy, please contact the Athletic Commission.

Name: Moses Heredia
Address: 1 Morning Dove Laguna Niguel Ca. 92677
Telephone Number: 909 - 717 - 7144
Email Address: Mheredia@globalprocessingsystems.com
Type of License Person Holds: Boxing Manager

Please note three dates of availability in the next 90 days:

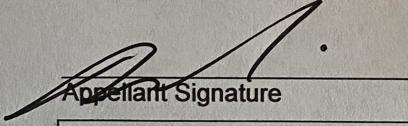
1. 9/22/20 2. 9/30/20 3. 10/7/20

Which of the following geographic locations is preferred? (Please circle one.)

Sacramento Los Angeles San Francisco San Diego

Will you require the services of an interpreter? Yes No If Yes, please state what

Language: _____

Statement	
See attached declaration	
 Appellant Signature	<u>8/20/20</u> Date of Request
FOR COMMISSION USE ONLY	
Date Received: _____ Receive By: _____	



Declaration of
Moses...dia.pdf

DECLARATION

I, Moses Heredia, hereby declare:

1. I am the duly licensed manager of professional boxer Joseph Diaz, Jr. (CSAC Manager-Fighter Contract M-2017-0006).

2. Since his professional debut in 2012, Mr. Diaz has benefitted tremendously from my and my entire family's tireless and devoted dedication in advancing his professional boxing career. We have made tremendous accomplishments despite a contentious and conflicting relationship with Mr. Diaz' promoter Golden Boy Promotions and Mr. Diaz' repeated poor judgments and misdeeds in his personal life that have potentially compromised his future.

3. On August 12, 2020, a public announcement was made that Mr. Diaz signed a contract with MTK Global, a foreign company that proclaims themselves to be "the world's foremost boxer management company" and claims to manage "over 300+ boxers" (www.mtkglobal.com). Mr. Diaz had privately and publicly confirmed the signing with MTK Global.

4. Mr. Diaz' communications and negotiations with MTK Global were done in secrecy and completely unbeknownst to me. His signing with MTK Global is a direct violation of our Manager-Fighter Agreement and the sole and exclusive rights granted to me as his Manager.

5. Mr. Diaz has not responded to any communications from me since the MTK Global signing. When my attorney contacted MTK Global CEO Bob Yalin regarding their tortious interference with my contractual relationship with Mr. Diaz, we were informed that Mr. Diaz has retained his own attorney in this matter and a dispute exists with respect to Mr. Diaz' intentions to honor the Manager-Fighter Agreement.

6. I hereby request the California State Athletic Commission exercise its jurisdiction and authority to regulate all boxing contracts entered into in California and schedule an Arbitration in this matter. I also request that the California State Athletic Commission exercises its duty and authority to protect its stakeholders from being taken advantage of by outside parties and investigate the actions of Mr. Diaz, MTK Global, and any other third parties in this matter.

7. Mr. Diaz is an immature and impressionable young man with a history of vices and indiscretions that have led to very poor decisions and actions in the past. I have done everything I possibly could to help Mr. Diaz focus on his promising boxing career and deal with his personal demons that cause him to make poor decisions and gamble his future away. I strongly believe Mr. Diaz continues to spiral out of control in his personal and financial life and has made an illegal, ill-advised, and ill-influenced decision for the wrong reasons. I also feel

**that Mr. Diaz may not be in the proper mental state to make rational decisions at this time and
that his recent decisions regarding the future of his boxing career were influenced by his
premeditated plan to violate the Manager-Fighter Agreement.**

**I declare under penalty of perjury, under the laws of the State of California, that the
above declaration is true and correct to my knowledge and belief.**

Dated August 20, 2020.



Moses Heredia