

# **EXHIBIT E**



August 20, 2020

Mr. Andy Foster  
Executive Officer  
California State Athletic Commission  
2005 Evergreen Street, Suite 2010  
Sacramento, CA 95815

Re: Request for Arbitration by Manager Moses Heredia (Contract #M-2017-0006)

Dear Mr. Foster:

This firm has been retained by Manager Moses Heredia in relation to a dispute between Mr. Heredia and Boxer Joseph Diaz Jr..

Pursuant to California Business and Professions Code Section 18611 and California Code of Regulations Title 4, Chapter 1, Section 227 (The Boxing Act), please find attached a duly signed Request For Arbitration and supporting Declaration of Moses Heredia.

It is our belief the Commission's goals of ensuring the integrity of the sport of boxing in the interest of the general public and the participating boxers and managers in California make this dispute an important one for Arbitration in California.

Mr. Heredia has dutifully represented the interests of Mr. Diaz for many years, including dealing with often times difficult relations/negotiations with Golden Boy Promotions to maximize Mr. Diaz' earnings and help Mr. Diaz reach the pinnacle of boxing success. This has been accomplished despite many personal life transgressions by Mr. Diaz that Mr. Heredia has attempted to help Mr. Diaz cure. It appears that now that Mr. Diaz has attained his world title, he has chosen to circumvent his Manager-Fighter relationship and entered into a different contractual relationship with a third party.

For reasons including but not limited to the foregoing, we kindly ask that you accept this Request For Arbitration and inform us of the earliest date available.

Please contact me if you need any further information regarding this matter.

Sincerely,



Steven Bash, Esq.  
Bash and Polyachenko, P.C.

CC:

Office of the Attorney General  
300 South Spring Street Suite 5212  
Los Angeles, California 90013



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

CALIFORNIA STATE ATHLETIC COMMISSION  
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## 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: [REDACTED]

Telephone Number: [REDACTED]

Email Address: [REDACTED]

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*

*8/20/20*  
Date of Request

### FOR COMMISSION USE ONLY

Date Received: \_\_\_\_\_ Receive By: \_\_\_\_\_

**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](http://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.

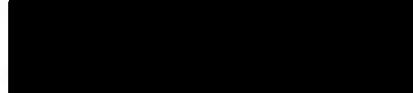
6. I hereby request the California State Athletic Commission exercise its jurisdiction and authority to regulate all boxing contracts entered into in California and schedule an Arbitration in this matter. I also request that the California State Athletic Commission exercises its duty and authority to 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**