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August 17, 2011

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VIA FEDERAL EXPRESS

Gilberto Mendoza, President World Boxing Association Centro Comercial Ciudad Turmero Calle Petion c/c Urdaneta, Piso 2 Local 21, Turmero 2115, Estado Aragua Venezuela

Gilberto Jesús Mendoza, Executive Vice President Ratings Committee, Director Championships Committee Director World Boxing Association Ave. Aquilino De La Guardia y Calle 47 Edificio Ocean Business Plaza, Piso 18 Panama 0816-02273, Panamá

Re: Khan vs. Judah – July 23, 2011 Bout

Dear President Mendoza and Executive Director Mendoza:

We write this letter for the purpose of bringing to your attention the inappropriate actions of the referee who handled the Judah/Khan July 23, 2011 unification bout. We ask that if you consider it in the rules of the WBA to require a rematch that this be done; if not, we request a high ranking for Mr. Judah.

To that end we are enclosing a disk which illustrates the reasons for this request.

Zab Judah was incapacitated by a low blow that the referee, indisputably, did not see. He did not see it because, as the tape we will present, he could not see it because he was out of position. Since he could not possibly have seen the blow which injured Zab Judah he had no rational grounds to call the blow fair. In these circumstances this is not a judgment call, because there was no judgment at all. The referee could have looked at the tape, but did not.

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Most respectfully, there is a difference between making a judgment call and guessing. The referee simply guessed, and guessed wrong.

SEGMEMENT "A"

The Referee Clearly Indicates to the Participants That The Top of The Beltline Is The Lowest Point At Which He Will Consider A Blow To Be Fair.

We have broken this tape down into segments. Segment "A" shows the referee giving pre-bout instructions. The referee is, as he should be, very clear as to where he will consider a blow to be fair. The instructions of the referee are textbook. Said the referee "Again, I want to caution you." He turns to Khan and says "Any punch below this this line will be called low." He places his hand at the top of the beltline of Zab Judah's trunks. His words are clear on the tape and where he places his hand is clear on the tape. He, identically, placed his hand in the same spot on Khan's trunks and gave the exact same instructions. Thus the referee clearly indicated where the foul line was for blows. Once he identified that spot he had the obligation to enforce it.

SEGMENT "B"

The Blow Landed By Khan Is Clearly A Foul Blow.

There are several camera shot angles for the blow in question. The first shot is "real time" from an angle from across the ring. The action is fast, but the tape clearly shows that Khan holds Zab Judah's head down while striking him with an uppercut well below the beltline. Judah falls to the floor holding his testicles, the classic position of someone who has suffered a low blow.

In the immediately following sequence the action is slowed down. You will see a right by Khan, then a left which misses. But, Khan then uses his left arm to hold Zab Judah's head down. While Judah's head is being held down Khan loads up on a right which begins very low and with an upward trajectory hits Judah well below the beltline. The viewer can see the trunks rise with the punch, and the fact that it is low is abundantly

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clear. The blow forces the cup up into Judah's scrotum, the very injury that the low blow rule is designed to ensure against.

The next sequence shows the same punch from a slightly different angle. Again, it is clear that the blow was low.

Note that in prior sequences one could not tell where the referee was when the blow landed.

SEGMENT "C"

The Referee Was Completely Out of Position.

While the prior sequence did not show the referee when the blow landed, the sequence which begins with "C" clearly does. This sequence is from the corner nearest the corner where the action was taking place. This sequence clearly shows Khan's left arm pushing Judah's head down while he hits Judah low with his right. It shows the referee standing behind Judah in a position where, indisputably, he could not possibly see where the blow fell. This angle also shows that the force of the blow was at least partially below the gold waistband of Judah's trunks as the viewer can see the black portion of the trunks rise with the blow.

It simply cannot be more clear that the referee did not see the blow which injured Zab Judah or that it was indisputably below the line the referee had stated would be declared to be a foul.

SEGMENT "D"

The Same Punch Is Called A Low Blow By The Referee Only One Week Later.

The sequence marked "D" first shows the clear low blow to Judah in a still shot. The next still shot is a blow by Edison Miranda just six days later. The two pictures are then place side by side. It is clear that the blow to Judah is lower than the one thrown by

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Miranda. Yet the same referee apparently called the Miranda blow low while he called the Khan blow legal. This simply cannot logically be.

We have learned that there is an issue as to whether the point was taken away due to the blow being low or a late hit. The outward evidence seems to be that the referee thought it to be a low blow, but we cannot state that with complete assurance as we cannot read the mind of the referee. We do know that Miranda's camp asserts with assurance that the referee called it a low blow, as did the telecast announcer.

SEGMENT "E"

The Next Sequence Shows That Khan or His Trainer Recognized A Flaw In the Referee And Exploited It By Foul Blows.

When the referee was chosen for this bout there was a concern because, while he had a good reputation, he was also believed to have a flaw in that he allowed blows to the back of the head and the holding down of a fighter's head. This had cropped up in the Chambers/Harris bout, held in June. We asked that the referee be spoken to about this and by being made aware of it was believed that the problem would not be repeated.

We suspect that the Khan camp saw the same flaw and deliberately took advantage of it. Whether that suspicion is accurate or not, Khan clearly intentionally engaged in an illegal tactic.

At 1:03 of the third round the tape shows Khan throwing a right. Judah ducks and then Khan literally takes both hands and pushes Judah's head down. Having pushed the head down, he then hits Judah with an uppercut. It is effective – and illegal. At 1:49 of the second round Khan misses with a left. Judah ducks and Khan uses his left arm to hold Judah's head down while he throws a right to the body. The referee, again, is out of position. Look carefully at this sequence because it foreshadows the action to take place in the fifth round. With 16 seconds left in round 2 Judah again ducks. Khan again pushes his head down and attempts to hit Judah.

At 2:08 of the fourth round Khan wraps his left arm around the back of Judah's head, then lands a body blow.

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At 2:23 of the fifth round the tape discloses that Khan places both hands behind Judah's head. He initially leans on Judah, clearly intentionally. Then we show the sequence at 30 seconds left in round 5. The tape discloses clearly that Khan is using his left arm to hold Judah's head down while he loads up on the punch which was low. We do not believe anyone could possibly conclude other than that the holding down of Judah's head was anything other than intentional. This was the sequence which resulted in Judah's injury. Thus a clearly illegal tactic culminated in a low blow.

SCIENTIFIC EXPLANATION AS TO EFFECT OF LOW BLOWS

There was a scientific analysis and medical explanation of the effect of low blows and why they are prohibited done as part of a series done by Fox Sports. The link appears at www.youtube.com/watch?v=X_FT_kc0wyY. We are also sending the link to you in electronic form where all you need to do is to click on the link to view the video.

ANALYSIS

The Nevada Athletic Commission regulations under which this bout was held are clear. NAC 467.668 defines a fair blow as "one delivered with the padded knuckle part of the glove on the front or side of the head or front or side of the body above the belt." (emphasis added). NAC 467.675 defines acts constituting fouls that include "Hitting below the belt" and "Holding an opponent with one hand and hitting with the other."

This bout was conducted under the unified rules of boxing which were read at the rules meeting and signed off on by both camps and read by the IBF Supervisor. Rule 13 states that a boxer who is hit by a low blow has up to 5 minutes to recover. If he then cannot continue he loses. In the case of an intentional foul and if a contestant cannot continue, the boxer who fouls loses on disqualification. Rule 12 (A)(1).

The tape does not lie. It is completely clear on the tape that the blow which brought Zab Judah to his knees was low. It is completely clear that Khan was pushing Zab Judah's head down when he threw the low blow. There is no ambiguity, and no exercise of discretion involved. The blow was low and either Zab Judah should have been given time to recover or Khan should have been disqualified.

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We cannot see into Mr. Khan's soul. We do not purport to know whether the low blow was purposeful or not. But the tape could not be more clear that a second foul was being committed at the same time – the pushing of Judah's head down while Khan struck him. One cannot, we submit, look at the tape and not conclude that the blow was anything other than intentional.

There was no exercise of discretion here. The referee properly specified where the low blow line was before the bout began. The Nevada Regulations do not state that the referee has the <u>discretion</u> whether or not to call a low blow if a boxer is struck below the beltline. They define such a strike as a foul.

It is undeniable that Zab Judah was losing the bout when the foul incapacitated him. This has led to a lack of outcry which we find distressing. Under that theory George Foreman would not have had the opportunity to knock out Michael Moorer and Arturo Gatti, to name just two, would not have been the boxing hero he became, just to name two of a long line.

It is a fact that the bout was prematurely stopped. The tape does not lie. We therefore request an ordered rematch, or, if that is not granted, a high ranking for Mr. Judah.

Very truly yours,

DINES AND ENGLISH, L.J.

BY:

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