

**United States Bankruptcy Court
Southern District of New York**

VOLUNTARY PETITION

Name of Debtor (If individual, enter Last, First, Middle):
MICHAEL G. TYSON

Name of Joint Debtor (Spouse) (Last, First, Middle):

All Other Names used by the Debtor in the last 6 years
(Include married, maiden and trade names):
MIKE TYSON

All Other Names used by the Joint Debtor in the last 6 years
(Include married, maiden and trade names):
03-41900

Soc. Sec./Tax I.D. No. (If more than one, state all):

Soc. Sec./Tax I.D. No. (If more than one, state all):

Street Address of Debtor (No. & Street, City, State & Zip Code):
c/o Barry Hankerson
155 W. 16th Street
New York, NY 10011

Street Address of Joint Debtor (No. & Street, City, State & Zip Code):

BK JUDGE GROPPER

County of Residence or of the
Principal Place of Business: **NEW YORK, NY**

County Of Residence or of the
Principal Place of Business:

Mailing Address of Debtor (If different from street address):

Mailing Address of Joint Debtor (If different from street address):

Location of Principal Assets of Business Debtor
(If different from street address listed above):

Venue (Check any applicable box)

Information Regarding the Debtor (Check the Applicable Boxes)

- Debtor has been domiciled or has had a residence, principal place of business, or principal assets in this District for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other District.
- There is a bankruptcy case concerning debtor's affiliate, general partner, or partnership pending in this District.

- Type Of Debtor (Check all boxes that apply)
- Individual(s)
 - Corporation
 - Partnership
 - Other _____
 - Railroad
 - Stockbroker
 - Commodity Broker
 - Clearing Bank

Chapter or Section of Bankruptcy Code Under Which
the Petition is Filed (Check one box)

- Chapter 7
- Chapter 9
- Sec. 304 - Case ancillary to foreign proceeding
- Chapter 11
- Chapter 12
- Chapter 13

Nature of Debt (Check one box)

- Consumer/Non-Business
- Business

Filing Fee (Check one box)

- Full Filing Fee attached
- Filing Fee to be paid in installments. (Applicable to individuals only.)
Must attach signed application for the court's consideration
certifying that the debtor is unable to pay fee except in installments.
Rule 1005(b). See Official Form No. 3

Chapter 11 Small Business (Check all boxes that apply)

- Debtor is a small business as defined in 11 U.S.C. § 101
- Debtor is and elects to be considered a small business under 11 U.S.C. § 1121(e) (Optional)

Statistical/Administrative Information (Estimates only)

- Debtor estimates that funds will be available for distribution to unsecured creditors.
- Debtor estimates that, after any exempt property is excluded and administrative expenses paid, there will be no funds available for distribution to unsecured creditors.

Estimated Number of Creditors

1-15	16-40	50-99	100-199	200-999	1000-over
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Estimated Assets

\$0 to \$50,000	\$50,001 to \$100,000	\$100,001 to \$500,000	\$500,001 to \$1,000,001	\$1,000,001 to \$10 million	\$10,000,001 to \$50 million ¹	\$50,000,001 to \$100 million	More than \$100 million
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Estimated Debts

\$0 to \$50,000	\$50,001 to \$100,000	\$100,001 to \$500,000	\$500,001 to \$1 million	\$1,000,001 to \$10 million	\$10,000,001 to \$50 million ¹	\$50,000,001 to \$100 million	More than \$100 million
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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¹ Reflects book value of assets and liabilities.

Voluntary Petition <i>(This page must be completed and filed in every case)</i>	Name of Debtor(s) MICHAEL G. TYSON
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Prior Bankruptcy Case Filed Within Last 6 Years (If more than one, attach additional sheet)

Location Where Filed:	Case Number:	Date Filed:
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Pending Bankruptcy Case Filed by any Spouse, Partner or Affiliate of this Debtor (If more than one, attach additional sheet)

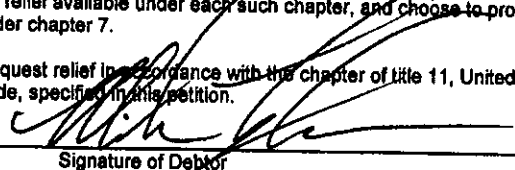
Name of Debtor: MIKE TYSON ENTERPRISES, INC.	Case Number: AS FILED	Date Filed: CONCURRENTLY
District: SOUTHERN DISTRICT OF NEW YORK	Relationship: AFFILIATE	Judge:

Signatures

Signature(s) of Debtor(s) (Individual/Joint)

I declare under penalty of perjury that the information provided in this petition is true and correct.
 [If petitioner is an individual whose debts are primarily consumer debts and has chosen to file under chapter 7] I am aware that I may proceed under chapter 7, 11, 12 or 13 of title 11, United States Code, understand the relief available under each such chapter, and choose to proceed under chapter 7.

I request relief in accordance with the chapter of title 11, United States Code, specified in this petition.



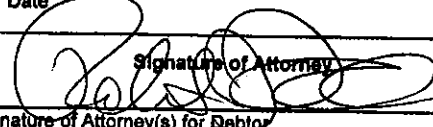
Signature of Debtor

Signature of Joint Debtor

Telephone Number (if not represented by attorney)

August 1, 2003

Date



Signature of Attorney

Signature of Attorney(s) for Debtor

DEBRA GRASSGREEN ROBERT FEINSTEIN
 Printed Name of Attorney(s) for Debtor(s)

PACHULSKI, STANG, ZIEHL,
 YOUNG, JONES
 & WEINTRAUB P.C.
 Three Embarcadero Center,
 Suite 1020
 San Francisco, CA 94111
 (415) 283-7000
 (415) 283-7010 Fax

PACHULSKI, STANG, ZIEHL,
 YOUNG, JONES
 & WEINTRAUB P.C.
 481 Fifth Avenue
 25th Floor
 New York, NY 10017
 (212) 581-7700
 (212) 581-7777 Fax

Signature of Debtor (Corporation/Partnership)

I declare under penalty of perjury that the information provided in this petition is true and correct, and that I have been authorized to file this petition on behalf of the debtor.

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

Signature of Authorized Individual

Printed Name of Authorized Individual

Title of Authorized Individual

August 1, 2003

Date

Exhibit A

(To be completed if debtor is required to file periodic reports (e.g., forms 10K and 10Q) with the Securities and Exchange Commission pursuant to Section 13 or 15d of the Securities Exchange Act of 1934 and is requesting relief under chapter 11)

Exhibit A is attached and made a part of this petition.

Exhibit B

(To be completed if debtor is an individual whose debts are primarily consumer debts) I, the attorney for the petitioner named in the foregoing petition, declare that I have informed the petitioner that [he or she] may proceed under chapter 7, 11, 12, or 13 of title 11, United States Code, and have explained the relief available under each such chapter.

Signature of Attorney(s) for Debtor(s)

Date

Exhibit C

Does the Debtor own or have possession of any property that poses or is alleged to pose a threat of imminent and identifiable harm to public health or safety?

Yes, and Exhibit C is attached and made a part of this petition

No

Signature of Non-Attorney Petition Preparer

I certify that I am a bankruptcy petition preparer as defined in 11 U.S.C. § 110, that I prepared this document for compensation, and that I have provided the debtor with a copy of this document.

Printed Name of Bankruptcy Petition Preparer

Social Security Number

Address

Names and Social Security numbers of all other individuals who prepared or assisted in preparing this document.

If more than one person prepared this document, attach additional sheets conforming to the appropriate official form for each person.

Signature of Authorized Individual

Date

A bankruptcy petition preparer's failure to comply with the provisions of title 11 and the Federal Rules of Bankruptcy procedure may result in fines or imprisonment or both 11 U.S.C. § 110; 18 U.S.C. § 156.

Debra I. Grassgreen (CA Bar No. 169978)
 Robert J. Feinstein (RF 2836)
 Malhar S. Pagay (CA Bar No. 189289)
 Maria A. Bove (MB 8687)
 PACHULSKI, STANG, ZIEHL, YOUNG,
 JONES & WEINTRAUB P.C.
 461 Fifth Avenue, 25th Floor
 New York, New York 10017
 Telephone: (212) 561-7700
 Facsimile: (212) 561-7777

Proposed Attorneys for Debtors and Debtors in Possession

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 DISTRICT COURT SDNY

UNITED STATES BANKRUPTCY COURT
 SOUTHERN DISTRICT OF NEW YORK

-----X		
In re	:	
	:	Chapter 11
MICHAEL G. TYSON,	:	
	:	Case No. 03 - _____ ()
Debtor.	:	
-----X		
In re	:	
	:	Chapter 11
MIKE TYSON ENTERPRISES, INC.,	:	
	:	Case No. 03 - _____ ()
Debtor.	:	
-----X		

**AFFIDAVIT OF MICHAEL G. TYSON
 PURSUANT TO LOCAL BANKRUPTCY RULE 1007-2**

STATE OF CALIFORNIA)
) ss.
 COUNTY OF LOS ANGELES)

MICHAEL G. TYSON, being duly sworn, deposes and says:

1. I am the President, Secretary, Chief Financial Officer and sole shareholder of Mike Tyson Enterprises, Inc., a California corporation ("MTE"). MTE and I (collectively, the "Debtors") are debtors in possession in the bankruptcy cases captioned above. I am familiar with

the Debtors' business and financial affairs and make the statements contained herein based on my personal knowledge, my review of business records, or upon information and belief. I am authorized to submit this affidavit in support of MTE's petition for relief under chapter 11 of Title 11, United States Code (the "Bankruptcy Code").

2. Unless otherwise indicated, the financial information described in or attached to this Affidavit has not been audited.

3. A description of the nature of my business and a concise statement of the circumstances leading to the filing of the chapter 11 cases (collectively, the "Cases") is set forth below in ¶¶ 20 through 35.

4. Neither of the Cases was commenced originally under either chapter 7 or 13 of the Bankruptcy Code.

5. To the best of my knowledge, information and belief, no informal committee of creditors or other interested parties has been organized prior to the commencement of the Cases.

6. Pursuant to Rule 1007(d) of the Federal Rules of Bankruptcy Procedure and Local Bankruptcy Rule 1007-2, this Affidavit includes the information set forth below.

7. Attached as **Exhibit "A"** to this Affidavit is a list of the names and addresses and, where available, telephone numbers of the creditors of each Debtor holding the twenty (20) largest unsecured claims, excluding insiders, and the name of the person familiar with the relevant Debtor's account. The list includes the amount of the claim, and, if

appropriate, an indication of whether such claim is contingent, unliquidated, disputed, or partially secured.

8. Attached as **Exhibit "B"** to this Affidavit is a list of the names and addresses of each of the Debtor's five (5) largest secured creditors. The list includes the amount of each claim, a brief description of the claim, an estimate of the value of the collateral securing the claim, and whether the claim or lien is disputed, subject to the relevant Debtor's rights to dispute the actual validity of any claims.

9. My principal assets consist of residential real property and substantial litigation claims, including pending litigation against Don King and affiliated entities seeking millions of dollars in damages. My principal liabilities include estimated tax claims of around \$17 million, business and personal expenditures in the aggregate amount of over \$10 million and contingent litigation claims asserted by third parties, including litigation filed by Lennox Lewis and his promoter seeking payment of \$20 million (the "Lewis Litigation"). MTE's principal assets include miscellaneous receivables and claims against third parties. MTE's principal liabilities consist of business-related expenses, certain tax-related liabilities and the Lewis Litigation.

10. I am the sole shareholder of MTE.

11. To the best of my knowledge, neither MTE nor I has any property that is in the possession or custody of any custodian, public officer, mortgagee, pledgee, assignee of rents, or secured creditor, or agent for any such entity other than perhaps bank accounts which may be subject to claims or setoff and cash collateral held as described in Exhibit "B."

12. At present, neither MTE nor I owns, leases or holds under some other arrangement premises from which MTE or I operate business.

13. My substantial assets are located in New York, New York. My books and records and those of MTE are located at the offices of my personal and business managers in New York, New York and Los Angeles, California. Neither MTE nor I holds assets outside the territorial limits of the United States.

14. To the best of my knowledge, there are no actions or proceedings, pending or threatened, against me or MTE or property belonging to either MTE or me, where a judgment or a seizure of property is imminent.

15. At present, I am the only member of senior management of MTE. However, both MTE and I have retained Neilson Elggren LLP ("Neilsen") as our restructuring/turnaround advisors. A brief summary of their relevant responsibilities and experience is contained in Neilsen's application for employment which is being filed with the Court, contemporaneously herewith.

16. Both MTE and I intend to continue to engage in business.

17. At present, neither I, personally, nor MTE employs any personnel. Accordingly, neither of the Debtors has a payroll to fund.

18. At present, I do not intend to receive any payments from either bankruptcy estate for services for the thirty (30) day period following the filing of its bankruptcy petition. To the extent that, in the future, I seek payment for services rendered to either bankruptcy estate,

I will obtain approval from the Court for compensation. Neilsen's compensation for services during the thirty (30) day period shall be as disclosed in its employment application to this Court.

19. During the thirty (30) period following the filing of the Debtors' petitions, I do not estimate that the estates will receive or disburse any funds, experience any net cash gain or loss or accrue any obligations and obligations remaining unpaid, other than professional fees.

**NATURE OF THE DEBTORS' BUSINESSES AND STATEMENT OF
CIRCUMSTANCES LEADING TO THE DEBTORS' CHAPTER 11 FILING**

Background

20. I am a professional boxer and a former heavyweight champion of the world. I was born on June 30, 1966, in Brooklyn, New York, and began boxing at the age of 13. I was a successful amateur boxer and turned professional on March 6, 1985. By August 1, 1987, I captured the World Boxing Council (WBC), World Boxing Association (WBA) and International Boxing Federation (IBF) heavyweight titles, becoming the undisputed world heavyweight champion.

21. In 1988, I hired boxing promoter Don King (collectively, "King"), and gave King complete control of my professional and business affairs.

22. I defended my titles successfully until February 11, 1990, when James "Buster" Douglas defeated me. I then won four straight bouts and earned the right to challenge for the title of world champion. At that time, my representatives were engaged in discussions for me to fight then title-holder Evander Holyfield on November 8, 1991. However, I was forced to postpone the bout due to an injury. In 1992, before the Holyfield fight could be rescheduled, I was convicted by a jury in Indianapolis, Indiana, of the July 19, 1991, alleged rape of a beauty

pageant contestant. On March 25, 1995, I was released for good behavior after serving only three years of my ten-year sentence.

23. On March 19, 1996, I regained the WBC heavyweight crown and six months later, on September 7, 1996, I recaptured the WBA Heavyweight Championship. On November 9, 1996, I lost to Evander Holyfield. My rematch with Holyfield on June 28, 1997, ended with my disqualification and resulted in the revocation of my license to box, the imposition of a \$3 million fine by the Nevada Athletic Commission and the filing of class action lawsuits in New York and Nevada by disgruntled fight viewers.

24. In late 1998, I entered into a Multi-Fight Agreement with Showtime Networks, Inc. ("Showtime"), which provided for the exclusive staging, television production and distribution of no less than five (5) fights, together with undercard events.

25. I returned to boxing on January 16, 1999, and won a succession of matches, but was defeated by Lennox Lewis on June 8, 2002. I defeated Clifford Etienne in a first round knockout on February 22, 2003. I have not boxed since, but intend to do so.

Business Entities

26. On February 20, 1998, MTE was incorporated in the State of California. I own MTE. I have an exclusive employment agreement with MTE. MTE provides my boxing-related services to third parties. I also formed Tyson Records, a California corporation, Tyson Gear, Inc., a Nevada corporation and Mike Tyson Productions, Inc., a Delaware corporation. None of the entities other than MTE is active or presently engaged in business operations.

Events Leading to the Filing of the Chapter 11 Cases

A. Litigation Regarding Breaches of Trust and Fraud Committed by Don King

27. In 1998, I filed a lawsuit (the "King Litigation") in the United States District Court for the Southern District of New York against Don King, Don King Productions, Inc., DKP Corporation and KingVision Pay Per View Ltd. In that lawsuit, I assert that King, among other things, (a) stole and diverted millions of dollars from me; (b) betrayed my trust and abandoned his fiduciary duties by entering into transactions in which my interests were diluted or ignored in favor of his interests; (c) forced me, while in prison, to sign various agreements purporting to grant King and third parties valuable rights without affording me access to independent legal counsel or business advisors; and (d) created a "sham" management team for me, consisting primarily of King's family members, in order to prevent me from seeking legal or business advice that he did not control. Trial in this matter is scheduled to commence in September 2003.

B. Lennox Lewis Lawsuit

28. On or about May 8, 2003, Lennox Lewis and his boxing promoter, Lion Promotions, L.L.C. ("Lion"), sued MTE and me in the Supreme Court of the State of New York and also sued Don King Productions, Inc. and Don King (the "Lewis Litigation"). The Lewis lawsuit accuses me of breaching an alleged agreement to fight Lewis twice, consecutively, for the heavyweight championship. Lewis and Lion also assert that King "commenced a campaign of bribery, lies and even a death threat" to cause me to allegedly breach obligations arising under a settlement of disputes between Lewis and me. Lewis and Lion seek damages in the amount of

\$20 million from me and damages of \$35 million as well as punitive damages in the amount of \$350 million from King.

29. My attorneys have explained to me that, simultaneous with the commencement of the Lewis Litigation, Lewis and Lion moved for an order providing for, among other relief, (a) a pre-trial attachment of any settlement of or judgment in the King Litigation up to \$25 million; (b) a temporary restraining order barring the settlement of the King Litigation pending a hearing on the motion; (c) a preliminary injunction precluding the parties to the King Litigation to give Lewis and Lion ten days' notice of any proposed settlement thereof; and (d) certain discovery from third parties. On May 9, 2003, the court entered an Order to Show Cause in favor of Lewis and Lion pursuant to which the court temporarily restrained me and King from settling the King Litigation pending a hearing on the motion on May 19, 2003 (the "Lewis TRO").

30. I have also been advised that, on May 14, 2003, the Lewis Litigation was removed to the United States District Court hearing the King Litigation and the Lewis TRO was subsequently vacated as moot. I understand that the Lewis Litigation could go to trial around December 8, 2003.

C. Tax Claims

31. I have substantial obligations to the Internal Revenue Service, certain state taxing authorities and the United Kingdom Inland Revenue Service based on profit and other income earned allegedly subject to such jurisdictions and other taxable events. As of July 10, 2003, my estimated aggregate direct and indirect tax liabilities exceeded \$17 million.

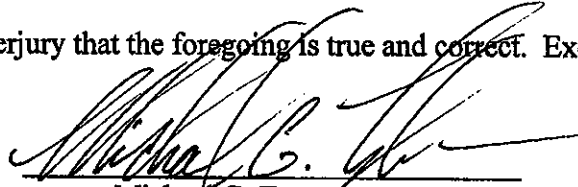
D. Tyson's Financial Condition and Retention of a Restructuring Manager

32. I have been in financial distress since 1998, when I was burdened with substantial debt to Showtime, taxing authorities and parties to litigation. Since that time, although my fight income, various asset sales and litigation recoveries have enabled me to pay a lot of my debt, I am still unable to pay my bills. I have not fought recently, I have no other income, and I am told that I have non-tax debt of over \$10 million in addition to the \$17 million in unpaid taxes. I have also incurred high legal costs in connection with the King Litigation and other matters and other personal and business obligations. My tangible assets include two former residences in Las Vegas, Nevada, cars and other property. I no longer live in Nevada. I have spent the most time in the last six (6) months in New York. I believe, however, that I have substantial intangible assets, including claims against Showtime, King and others who are located in New York.

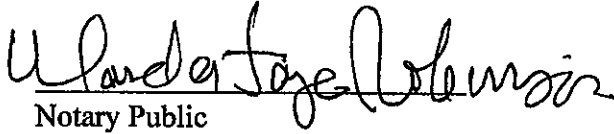
33. In July 2003, after considering various alternatives and consulting with my advisors, I decided that the retention of a restructuring and turnaround manager to help me fix my financial situation and the filing of a bankruptcy case was the best course of action.

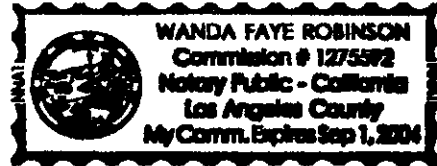
Accordingly, we retained the services of Neilson Elggren LLP and agreed to file these cases.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 15th day of August, 2003.


Michael G. Tyson

Sworn to and Subscribed
before me, a Notary Public of the State
and County aforesaid on this 15th day
of August, 2003.


Notary Public



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DISTRICT COURT SDNY
DOCS

Debra Grassgreen (CA SBN 169978)¹
Robert J. Feinstein (RF 2836)
Malhar S. Pagay (CA SBN 189289)¹
Maria A. Bove (MB 8687)
PACHULSKI, STANG, ZIEHL, YOUNG,
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Telephone: (212) 561-7700
Facsimile: (212) 561-777

Proposed Attorneys for the Debtor and Debtor in Possession

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re :
MICHAEL G. TYSON, : Chapter 11
Debtor. : Case No. 03 - _____ ()
-----X

**VERIFICATION OF LIST OF CREDITORS
HOLDING 20 LARGEST UNSECURED CLAIMS**

I, MICHAEL G. TYSON named as the Debtor in this case, declare under penalty of perjury that I have read the foregoing List of Creditors Holding 20 Largest Unsecured Claims and that it is true and correct to the best of my information and belief.

Dated: August 1, 2003

Signature 
MICHAEL G. TYSON

¹ *Pro Hac Vice* admission pending.

Form 4. LIST OF CREDITORS HOLDING 20 LARGEST UNSECURED CLAIMS

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re MICHAEL G. TYSON

Debtor

Case No. _____

Chapter 11

LIST OF CREDITORS HOLDING 20 LARGEST UNSECURED CLAIMS

Following is a list of the debtor's creditors holding the 20 largest unsecured claims. The list is prepared in accordance with FED. R. Bankr. P. 1007(d) for the filing in this chapter 11 case. The list does not include (1) persons who come within the definition of "insider" set forth in 11 U.S.C. § 101(30), or (2) secured creditors unless the value of the collateral is such that the unsecured deficiency places the creditor among the holders of the 20 largest unsecured claims.

Name of creditor and complete mailing address including zip code	Name, telephone number and complete mailing address, including zip code, of employee, agent, or department of creditor familiar with claim who may be contacted	Nature of claim (trade debt, bank loan, government contract, etc.)	CONTINGENT	UNLIQUIDATED	DISPUTED	AMOUNT OF CLAIM (if secured also state value of security)
Internal Revenue Service Fresno, CA 93888	Internal Revenue Service Fresno, CA 93888	Taxes				13,368,233.00
Inland Revenue Service Taxes - UK	Inland Revenue Service Taxes - UK	Taxes				4,000,000.00
Ziffren, Brittenham, & Branca 1801 Century Park West Los Angeles, CA 90067	Ziffren, Brittenham, & Branca 1801 Century Park West Los Angeles, CA 90067 (310) 286-9971	Legal Services				382,028.02
USI of Southern California Ins. Services PO Box 9004 Van Nuys, CA 91409	USI of Southern California Ins. Services PO Box 9004 Van Nuys, CA 91409 (818) 704-1000	Insurance				257,555.62
Jewelers, Inc. 2400 Western Avenue Las Vegas, NV 89102	Jewelers, Inc. 2400 Western Avenue Las Vegas, NV 89102 (702) 382-7411	Jewelry				173,706.05

Form 4. LIST OF CREDITORS HOLDING 20 LARGEST UNSECURED CLAIMS (Con'td)

Name of creditor and complete mailing address including zip code	Name, telephone number and complete mailing address, including zip code, of employee, agent, or department of creditor familiar with claim who may be contacted	Nature of claim (trade debt, bank loan, government contract, etc.)	CONTINGENT	UNLIQUIDATED	DISPUTED	AMOUNT OF CLAIM (if secured also state value of security)
Jimmerson Hansen 415 South Sixth Street Suite 100 Las Vegas, NV 89101	Jimmerson Hansen 415 South Sixth Street Suite 100 Las Vegas, NV 89101 (702) 388-7171 Harriet	Legal Services				130,528.77
Darius Rugs 981 3rd Ave. New York, NY 10022	Darius Rugs 981 3rd Ave. New York, NY 10022 (212) 644-6600	Home Furnishings				78,000.00
Ferrari of Beverly Hills 9375 Wilshire Blvd. Beverly Hills, CA 90212	Ferrari of Beverly Hills 9375 Wilshire Blvd. Beverly Hills, CA 90212 (310) 275-4400	Litigation				60,603.00
E&R Electric, Inc. 5030 W. Oquendo Road Suite 300 Las Vegas, NV 89118	E&R Electric, Inc. 5030 W. Oquendo Road Suite 300 Las Vegas, NV 89118 (702) 877-0105	Home Improvements				54,408.83
Kimberly Scarborough	Kimberly Scarborough	Debt				51,949.42

Form 4. LIST OF CREDITORS HOLDING 20 LARGEST UNSECURED CLAIMS (Con'td)

Name of creditor and complete mailing address including zip code	Name, telephone number and complete mailing address, including zip code, of employee, agent, or department of creditor familiar with claim who may be contacted	Nature of claim (trade debt, bank loan, government contract, etc.)	CONTINGENT	UNLIQUIDATED	DISPUTED	AMOUNT OF CLAIM (if secured also state value of security)
Kajan Mather and Barish 9777 Wilshire Boulevard Suite 805 Beverly Hills, CA 90212	Kajan Mather and Barish 9777 Wilshire Boulevard Suite 805 Beverly Hills, CA 90212 (310) 278-6080	Legal Services				45,617.42
Don King 556 E Washington Ste 1501 Las Vegas, NV 88102	Don King 556 E Washington Ste 1501 Las Vegas, NV 88102	Litigation		X	X	Unliquidated
Lennox Lewis c/o Judd Bernstein PC 1790 Broadway New York, NY 10019	Lennox Lewis c/o Judd Bernstein PC 1790 Broadway New York, NY 10019 (212) 974-2400	Litigation		X	X	Unliquidated
Lion Promotions LLC c/o Judd Bernstein PC 1790 Broadway New York, NY 10019	Lion Promotions LLC c/o Judd Bernstein PC 1790 Broadway New York, NY 10019 (212) 974-2400	Litigation		X	X	Unliquidated
Roosevelt McKinley c/o Henry C. Shelton, III, Esq. 80 Monroe Ave., Ste 700 Memphis, TN 38103	Roosevelt McKinley c/o Henry C. Shelton, III, Esq. 80 Monroe Ave., Ste 700 Memphis, TN 38103 (901) 523-8211 Henry C. Shelton, III	Litigation		X	X	Unliquidated

Form 4. LIST OF CREDITORS HOLDING 20 LARGEST UNSECURED CLAIMS (Con'td)

Name of creditor and complete mailing address including zip code	Name, telephone number and complete mailing address, including zip code, of employee, agent, or department of creditor familiar with claim who may be contacted	Nature of claim (trade debt, bank loan, government contract, etc.)	CONTINGENT	UNLIQUIDATED	DISPUTED	AMOUNT OF CLAIM (if secured also state value of security)
Monica Turner Tyson	Monica Turner Tyson	Litigation		X		Unliquidated
Wonda Laquette Graves c/o Raul Lionel Felder 437 Madison Avenue New York, NY 10022	Wonda Laquette Graves c/o Raul Lionel Felder 437 Madison Avenue New York, NY 10022 (212) 832-3939	Litigation		X	X	Unliquidated
Keith Rhodes c/o Joseph . Giaimo, Esq. Giamo & Vreeburg 80-02 Kew Gardens Rd. Kew Gardens, NY 11415	Keith Rhodes c/o Joseph . Giaimo, Esq. Giamo & Vreeburg 80-02 Kew Gardens Rd. Kew Gardens, NY 11415 (718) 261-6200	Litigation		X	X	Unliquidated
Mitch Rose	Mitch Rose	Litigation		X	X	Unliquidated
WBC, Inc.	WBC, Inc.	Litigation		X	X	Unliquidated
TOTAL						\$18,602,630.13

EXHIBIT B

CREDITORS HOLDING LARGEST SECURED CLAIMS

The list below pertains to debtor Michael G. Tyson only. To the best of the Debtor's knowledge, no secured claims exist as to debtor Mike Tyson Enterprises, Inc. The list does not include persons who come within the definition of "insider" set forth in 11 U.S.C. § 101. The information herein shall not constitute an admission of liability by, nor is it binding on either Debtor. This list reflects amounts as of June 30, 2003. Both Debtors reserve the right to supplement this disclosure upon further investigation.

Name and Address of Creditor	Description of Claim	Estimated Amount of Claim	Estimated Value of Collateral	Whether or Not Disputed
Cendant Mortgage 4001 Leadenhall Road Mount Laurel, NJ 08054	Mortgage: 6740 Tomiyasu Lane Las Vegas, Nevada	\$1,000,000.00	\$4,000,000.00	No
Cendant Mortgage 4001 Leadenhall Road Mount Laurel, NJ 08054	Mortgage: 6760 Tomiyasu Lane Las Vegas, Nevada	\$1,000,000.00	\$1,000,000.00	No

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