

# EXHIBIT E

**From:** [Stravalle, Charles \(SLA\)](#)  
**To:** [Daniel Chirlin](#); [Jim Walden](#)  
**Cc:** [Ammirato, Michael \(SLA\)](#); [Peter A. Devlin](#)  
**Subject:** Re: MSGE - SLA  
**Date:** Friday, February 3, 2023 2:34:54 PM

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**External Email - Caution before clicking links.**

Hello,

The position is that the attorney accepted service and is ready, willing, and able to provide the documentation at the proscribed time and date. Furthermore, the SLA is not asking for and does not expect to receive any confidential information.

Thank you.

CS

Sincerely,

Charles R. Stravalle  
Investigative Specialist 1, Beverage Control, NYS Peace Officer

New York State Liquor Authority  
Enforcement Bureau, Zone 1  
163 West 125 Street, 8th floor  
New York, New York 10027  
Office (347) 291-2047 | [charles.stravalle@sla.ny.gov](mailto:charles.stravalle@sla.ny.gov)  
[www.sla.ny.gov](http://www.sla.ny.gov)  
Cell (917) 589-3128  
Fax (212) 961-8381

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**From:** Stravalle, Charles (SLA) <[Charles.Stravalle@sla.ny.gov](mailto:Charles.Stravalle@sla.ny.gov)>  
**Sent:** Friday, February 3, 2023 11:09 AM  
**To:** Daniel Chirlin <[dchirlin@wmhlaw.com](mailto:dchirlin@wmhlaw.com)>; Jim Walden <[jwalden@wmhlaw.com](mailto:jwalden@wmhlaw.com)>  
**Cc:** Ammirato, Michael (SLA) <[Michael.Ammirato@sla.ny.gov](mailto:Michael.Ammirato@sla.ny.gov)>; Peter A. Devlin <[pdevlin@wmhlaw.com](mailto:pdevlin@wmhlaw.com)>  
**Subject:** Re: MSGE - SLA

Hello,

Hope all is well. Will get back to you at 1:30 pm after a meeting in reference.

Thanks

CS

Sincerely,

Charles R. Stravalle  
Investigative Specialist 1, Beverage Control, NYS Peace Officer

New York State Liquor Authority  
Enforcement Bureau, Zone 1  
163 West 125 Street, 8th floor  
New York, New York 10027  
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[www.sla.ny.gov](http://www.sla.ny.gov)  
Cell (917) 589-3128  
Fax (212) 961-8381

---

**From:** Daniel Chirlin <[dchirlin@wmhlaw.com](mailto:dchirlin@wmhlaw.com)>  
**Sent:** Thursday, February 2, 2023 8:02 PM  
**To:** Stravalle, Charles (SLA) <[Charles.Stravalle@sla.ny.gov](mailto:Charles.Stravalle@sla.ny.gov)>; Jim Walden <[jwalden@wmhlaw.com](mailto:jwalden@wmhlaw.com)>

Cc: Ammirato, Michael (SLA) <Michael.Ammirato@sla.ny.gov>; Peter A. Devlin <pdevlin@wmhlaw.com>

Subject: Re: MSGE - SLA

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Sent on behalf of Jim:

Charlie,

We have been notified that you issued a documentary and testimonial subpoena to Bertsein Litowitz Berger & Grossman LLP. As your subpoena does not comply with the 20-day notice provision under CPLR 3106(b) and CPLR 3120(2), it is defective. In addition, the documents and information you are requesting are confidential and protected pursuant to a Protective Order. We ask that you withdraw the subpoena, which does not comply with New York law. If you choose not to withdraw, be advised that we will be moving to quash the subpoena.

Please respond with your position no later than noon tomorrow, February 3, 2023, so that we may plan accordingly.

Thank you.

Dan Chirlin

**Walden Macht & Haran LLP**

250 Vesey Street, 27th Floor

New York, New York 10281

Office: (212) 335-2956

Mobile: (646) 763-0686

Dchirlin@wmhlaw.com

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**From:** Stravalle, Charles (SLA) <Charles.Stravalle@sla.ny.gov>

**Sent:** Thursday, February 2, 2023 11:31:11 AM

**To:** Jim Walden <jwalden@wmhlaw.com>

**Cc:** Ammirato, Michael (SLA) <Michael.Ammirato@sla.ny.gov>; Peter A. Devlin <pdevlin@wmhlaw.com>; Daniel Chirlin <dchirlin@wmhlaw.com>

**Subject:** Re: MSGE - SLA

**External Email - Caution before clicking links.**

Hello,

Sure, I will copy them. I just ask that one person handle the communications moving forward so that there are no misunderstandings.

CS

Sincerely,

Charles R. Stravalle

Investigative Specialist 1, Beverage Control, NYS Peace Officer

New York State Liquor Authority

Enforcement Bureau, Zone 1

163 West 125 Street, 8th floor

New York, New York 10027

Office (347) 291-2047 | charles.stravalle@sla.ny.gov

www.sla.ny.gov

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---

**From:** Jim Walden <jwalden@wmhlaw.com>

**Sent:** Thursday, February 2, 2023 9:40 AM

**To:** Stravalle, Charles (SLA) <Charles.Stravalle@sla.ny.gov>

**Cc:** Ammirato, Michael (SLA) <Michael.Ammirato@sla.ny.gov>; Peter A. Devlin <pdevlin@wmhlaw.com>; Daniel Chirlin <dchirlin@wmhlaw.com>

**Subject:** RE: MSGE - SLA

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Please copy my colleagues and advise whether they also need to file notices of appearance. We will revert with other attendee email addresses.

Jim Walden

**Walden Macht & Haran LLP**

th

This is a copy of a pleading filed electronically pursuant to New York State court rules (22 NYCRR §202.5-b(d)(3)(i)) which, at the time of its printout from the court system's electronic website, had not yet been reviewed and approved by the County Clerk. Because court rules (22 NYCRR §202.5[d]) authorize the County Clerk to reject filings for various reasons, readers should be aware that documents bearing this legend may not have been accepted for filing by the County Clerk.

250 Vesey Street, 27 Floor  
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O: (212) 335-2031  
C: (646) 645-6377  
[jwalden@wmhlaw.com](mailto:jwalden@wmhlaw.com)  
[www.wmhlaw.com](http://www.wmhlaw.com)

*Note our new address effective January 1, 2021*

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---

**From:** Stravalle, Charles (SLA) <Charles.Stravalle@sla.ny.gov>  
**Sent:** Thursday, February 2, 2023 9:34 AM  
**To:** Jim Walden <jwalden@wmhlaw.com>  
**Cc:** Ammirato, Michael (SLA) <Michael.Ammirato@sla.ny.gov>  
**Subject:** Re: MSGE - SLA

**External Email - Caution before clicking links.**

Good morning,

Hope all is well.

It was my understanding that the Chief of Staff for the MSG Chairman Ms. Kerry Lynch confirmed Mr. Dolan's availability for the appearance on Monday, 2/6/23 at 10 am. However, Counsel's Office has consented to your request to change the time for the interview from 10 am to start at 2 pm.

Please send the names and email addresses of the participants so I can revise the link.

Also, the affidavit mentioned below needs to be submitted.

Many thanks for your cooperation.

CS

Sincerely,

Charles R. Stravalle  
Investigative Specialist 1, Beverage Control, NYS Peace Officer

New York State Liquor Authority  
Enforcement Bureau, Zone 1  
163 West 125 Street, 8th floor  
New York, New York 10027  
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[www.sla.ny.gov](http://www.sla.ny.gov)  
Cell (917) 589-3128  
Fax (212) 961-8381

---

**From:** Jim Walden <[jwalden@wmhlaw.com](mailto:jwalden@wmhlaw.com)>  
**Sent:** Thursday, February 2, 2023 8:53 AM  
**To:** Peter A. Devlin <[pdevlin@wmhlaw.com](mailto:pdevlin@wmhlaw.com)>; Stravalle, Charles (SLA) <[Charles.Stravalle@sla.ny.gov](mailto:Charles.Stravalle@sla.ny.gov)>; Daniel Chirlin <[dchirlin@wmhlaw.com](mailto:dchirlin@wmhlaw.com)>  
**Cc:** Ammirato, Michael (SLA) <[Michael.Ammirato@sla.ny.gov](mailto:Michael.Ammirato@sla.ny.gov)>  
**Subject:** RE: MSGE - SLA

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Charlie

Are you going to send a new link for 2-4 pm on Monday? We are working on your new requests.

Please advise.

Jim

**This is a copy of a pleading filed electronically pursuant to New York State court rules (22 NYCRR §202.5-b(d)(3)(i)) which, at the time of its printout from the court system's electronic website, had not yet been reviewed and approved by the County Clerk. Because court rules (22 NYCRR §202.5[d]) authorize the County Clerk to reject filings for various reasons, readers should be aware that documents bearing this legend may not have been accepted for filing by the County Clerk.**

Jim Walden  
**Walden Macht & Haran LLP**  
250 Vesey Street, 27<sup>th</sup> Floor  
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C: (646) 645-6377  
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[www.wmhlaw.com](http://www.wmhlaw.com)

*Note our new address effective January 1, 2021*

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**From:** Peter A. Devlin <[pdevlin@wmhlaw.com](mailto:pdevlin@wmhlaw.com)>  
**Sent:** Tuesday, January 31, 2023 6:43 PM  
**To:** Stravalle, Charles (SLA) <[Charles.Stravalle@sla.ny.gov](mailto:Charles.Stravalle@sla.ny.gov)>; Daniel Chirlin <[dchirlin@wmhlaw.com](mailto:dchirlin@wmhlaw.com)>; Jim Walden <[jwalden@wmhlaw.com](mailto:jwalden@wmhlaw.com)>  
**Cc:** Ammirato, Michael (SLA) <[Michael.Ammirato@sla.ny.gov](mailto:Michael.Ammirato@sla.ny.gov)>  
**Subject:** RE: MSGE - SLA

Charlie,

Thank you for your email. As we wrote to you in our last email, we believe that we have already produced all the information that you requested which was both reasonably accessible and maintained in the regular course of business. You are now requesting additional information that was not included in your initial request. We are working with the client to see if the information exists. If so, we will produce it as quickly as we can.

Separately, we are in receipt of your WebEx invitation for the 2/6 interview to begin at 10am. As noted in our initial 1/20 email suggesting the 6<sup>th</sup>, Mr. Dolan is only available from 2-4pm. As we have made clear on several occasions, we are happy to cooperate with the SLA and will voluntarily proceed with the interview at the times that work for Mr. Dolan and our client.

Thank you,

Peter A. Devlin (he/him)  
**Walden Macht & Haran LLP**  
250 Vesey Street, 27<sup>th</sup> Floor  
New York, New York 10281  
O: (212) 335-2388  
C: (215) 279-2749  
[pdevlin@wmhlaw.com](mailto:pdevlin@wmhlaw.com)  
[www.wmhlaw.com](http://www.wmhlaw.com)

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**From:** Stravalle, Charles (SLA) <[Charles.Stravalle@sla.ny.gov](mailto:Charles.Stravalle@sla.ny.gov)>  
**Sent:** Monday, January 30, 2023 10:13 AM  
**To:** Daniel Chirlin <[dchirlin@wmhlaw.com](mailto:dchirlin@wmhlaw.com)>; Jim Walden <[jwalden@wmhlaw.com](mailto:jwalden@wmhlaw.com)>  
**Cc:** Ammirato, Michael (SLA) <[Michael.Ammirato@sla.ny.gov](mailto:Michael.Ammirato@sla.ny.gov)>; Peter A. Devlin <[pdevlin@wmhlaw.com](mailto:pdevlin@wmhlaw.com)>  
**Subject:** Re: MSGE - SLA

**External Email - Caution before clicking links.**

Hello Mr. Chirlin,

Hope all is well. I appreciate you making an effort and following-up.

The information provided on 01/27/23 was received. I asked from the end of December 2022 for very specific information, in writing, which I have pasted below for your reference along with when the item was satisfied or not. Please review and ensure that you have provided what has been requested in its entirety.

To be clear, the exclusion list was to include any and all individuals who are currently on the exclusion list(s) attorneys and non-attorneys. This means any and all individuals who are currently not permitted to enter events at MSG and the specified venues mentioned in the letters. This is to include those individuals with lifetime bans and is to include any governmental officials who have been ban, including the justification.

Is it your position that MSG does not record the time when an ejection takes place along with the person observing the exclusion? and that MSG does not maintain records of when an individual potentially violates a written order or enters without permission for future reference or provides written notice?

Records would include the capture on body worn camera or video surveillance footage that have time and date stamps or security system databases with same functionalities, affidavits, or any other records.

When you are satisfied that the information that you have provided is complete, please send an affidavit that the information provided to the State Liquor Authority is true, complete, and accurate.

Please be advised that providing inaccurate, incomplete, false or misleading information may be cause for legal consequences.

In an effort to limit misunderstandings, moving forward the attorney listed on the Notice of Appearance should be the point person on communications.

Many thanks for your cooperation.

CS

Sincerely,

Charles R. Stravalle  
Investigative Specialist 1, Beverage Control, NYS Peace Officer

New York State Liquor Authority  
Enforcement Bureau, Zone 1  
163 West 125 Street, 8th floor  
New York, New York 10027  
Office (347) 291-2047/charles.stravalle@sla.ny.gov  
[www.sla.ny.gov](http://www.sla.ny.gov)  
Cell (917) 589-3128  
Fax (212) 961-8381

A production of letters was received on 1/13/23 and 1/20/23. Spreadsheet was received on 01/25/23 and supplemented on 01/27/23 with additional information.

List of participants with email addresses for Webex invitations has not been received as of 01/30/23

1. Notice of Appearance (blank copy attached for your convenience) Received 01/07/23
2. The date that Mr. Lawrence Burian departed the company as he is still listed as a principal Not Received and not mentioned in the email, the exact date of his departure was not indicated. Month and year given as April 2020, not the exact date. Submitted as 04/17/2020 on 01/25/23.
3. Exclusion List with justification for each person being banned (not just attorneys but any others as well with justification- records dating back 24 months.) Not Received not mentioned in the email-Spreadsheet to be produced 1/24/23 received 1/25/23 and 1/27/23
4. Names of those persons excluded, to date. To include the date, time, event, location address, venue name, and the ejecting official, same time frame as above. Not Received and not mentioned in the email-Spreadsheet to be produced 1/24/23 received 1/25/23 and 1/27/23 (Time, location event and ejecting official not disclosed)
5. Whether the exclusion extends to restaurants and affiliates under the Tao Group, i.e., Lavo and others with business interest Not Received and not mentioned in the email-to be answered on 1/24/23. Answered 1/25/23-no exclusions at Tao Group.
6. Three dates and times after the new year (in January 2023) when Mr. Dolan can participate in an interview to discuss the policy, development and implementation. A person(s) with knowledge of the exclusion policy, development of said policy, and implementation must be available with him. While I would prefer in person, I would not be opposed to WebEx for convenience. Also, a person with knowledge of business practices of MSG. Please send me the names in advance. Three dates were proposed by MSG (1/23, 24, 25) on 01/07/23 along with Mr. Weidenfeld and Mr. Schoenfeld as participants as well as now Mr. Dolan under subpoena. Adjournment granted until Monday, 2/6/23 at MSG's request, date of MSG's choosing, scheduled for 10 am- 2pm and Mr. Dolan's Chief of Staff confirmed. Subsequently, a third change was requested 01/31/23 to move the time from 10 am to start at 2 pm-4 pm on Monday, 2/6/23 which was granted.

Please arrange for the quick call that we discussed so that I can personally inform Mr. Dolan. This was not done

Charlie,

MSG does not maintain all the information you are seeking in its regular course of business. Consistent with our commitments to you, we have diligently gathered the information reasonably accessible. Further, we've put it into a format created solely at your request (i.e., it's not a regular business record).

We don't understand why the information we've already provided—now in two separate formats—is not sufficient for the purposes of your inquiry. In the spirit of continuing cooperation, however, we provide the following additional information:

1. Breakdown of exclusion by venue, where applicable (included in the revised attached spreadsheet); (Note: CS-The addresses of the venue- Tao Group has almost a dozen locations)
2. In each case, the denial of entry was supervised by an attorney, in-person or by phone. The main coordinating attorney is Hal Weidenfeld; (Note: CS The name of the person communicating directly with the excluded person on the scene at the time is requested)
3. The denials of entry took place during ingress before or shortly after the beginning of each event. (Note: CS Time of the ejection was

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requested)

Any additional information you may be seeking is not reasonably available or was not maintained in the regular course of business.

Please let us know if you have any questions.

Dan Chirlin  
**WALDEN MACHT & HARAN LLP**  
250 Vesey Street, 27<sup>th</sup> Floor  
New York, New York 10281  
Office: (212) 335-2956  
Mobile: (646) 763-0686  
[dchirlin@wmhlaw.com](mailto:dchirlin@wmhlaw.com)  
[www.wmhlaw.com](http://www.wmhlaw.com)

Sincerely,

Charles R. Stravalle  
Investigative Specialist 1, Beverage Control, NYS Peace Officer

New York State Liquor Authority  
Enforcement Bureau, Zone 1  
163 West 125 Street, 8th floor  
New York, New York 10027  
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[www.sla.ny.gov](http://www.sla.ny.gov)  
Cell (917) 589-3128  
Fax (212) 961-8381

---

**From:** Stravalle, Charles (SLA) <[Charles.Stravalle@sla.ny.gov](mailto:Charles.Stravalle@sla.ny.gov)>  
**Sent:** Wednesday, January 25, 2023 7:15 PM  
**To:** Peter A. Devlin <[pdevlin@wmhlaw.com](mailto:pdevlin@wmhlaw.com)>; Jim Walden <[jwalden@wmhlaw.com](mailto:jwalden@wmhlaw.com)>  
**Cc:** Daniel Chirlin <[dchirlin@wmhlaw.com](mailto:dchirlin@wmhlaw.com)>; Ammirato, Michael (SLA) <[Michael.Ammirato@sla.ny.gov](mailto:Michael.Ammirato@sla.ny.gov)>  
**Subject:** Re: MSGE - SLA

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Hello,

Hope all is well. Received.

Any specifics to come as to the venue origin of the concerned lawsuits that prompted the exclusion, other than the generic term MSG? Such as the particular restaurant, theatre etc. As you know, MSG has multiple liquor licensed venues, almost a dozen in New York alone. Am I missing a tab? and the individual who executed the denied entry at each site with the time? Also, you were going to let me know if any written records of the encounter existed.

Please let me know when you have a chance. Many thanks.

CS

Sincerely,  
Charles R. Stravalle  
Investigative Specialist 1, Beverage Control, NYS Peace Officer

New York State Liquor Authority  
Enforcement Bureau, Zone 1  
163 West 125 Street, 8th floor  
New York, New York 10027  
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[www.sla.ny.gov](http://www.sla.ny.gov)  
Cell (917) 589-3128  
Fax (212) 961-8381

---

**From:** Peter A. Devlin <[pdevlin@wmhlaw.com](mailto:pdevlin@wmhlaw.com)>  
**Sent:** Wednesday, January 25, 2023 6:48 PM

**To:** Jim Walden <[jwalden@wmhlaw.com](mailto:jwalden@wmhlaw.com)>; Stravalle, Charles (SLA) <[Charles.Stravalle@sla.ny.gov](mailto:Charles.Stravalle@sla.ny.gov)>  
**Cc:** Daniel Chirlin <[dchirlin@wmhlaw.com](mailto:dchirlin@wmhlaw.com)>; Ammirato, Michael (SLA) <[Michael.Ammirato@sla.ny.gov](mailto:Michael.Ammirato@sla.ny.gov)>  
**Subject:** RE: MSGE - SLA

**ATTENTION:** This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Dear Mr. Stravalle,

Please see attached for MSGE's third production related to this matter.

Kind regards,

Peter A. Devlin (he/him)  
**Walden Macht & Haran LLP**  
250 Vesey Street, 27th Floor  
New York, New York 10281  
O: (212) 335-2388  
C: (215) 279-2749  
[pdevlin@wmhlaw.com](mailto:pdevlin@wmhlaw.com)  
[www.wmhlaw.com](http://www.wmhlaw.com)

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**From:** Jim Walden <[jwalden@wmhlaw.com](mailto:jwalden@wmhlaw.com)>  
**Sent:** Tuesday, January 24, 2023 9:10 PM  
**To:** Stravalle, Charles (SLA) <[Charles.Stravalle@sla.ny.gov](mailto:Charles.Stravalle@sla.ny.gov)>; Peter A. Devlin <[pdevlin@wmhlaw.com](mailto:pdevlin@wmhlaw.com)>  
**Cc:** Daniel Chirlin <[dchirlin@wmhlaw.com](mailto:dchirlin@wmhlaw.com)>; Ammirato, Michael (SLA) <[Michael.Ammirato@sla.ny.gov](mailto:Michael.Ammirato@sla.ny.gov)>  
**Subject:** Re: MSGE - SLA

Charlie,

That's incorrect. You and I spoke last Wednesday, the 18th. At the end of the call, I asked if we could get you the spreadsheet by the 25th. You said "that's reasonable." We did not agree to send you anything by the 24th. We will send you the spreadsheet tomorrow, as promised.

Best regards,

Jim Walden  
**Walden Macht & Haran LLP**  
250 Vesey Street, 27<sup>th</sup> Floor  
New York, New York 10281  
O: (212) 335-2031  
C: (646) 645-6377  
[jwalden@wmhlaw.com](mailto:jwalden@wmhlaw.com)  
[www.wmhlaw.com](http://www.wmhlaw.com)

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**From:** Stravalle, Charles (SLA) <[Charles.Stravalle@sla.ny.gov](mailto:Charles.Stravalle@sla.ny.gov)>  
**Sent:** Tuesday, January 24, 2023 8:41:39 PM  
**To:** Jim Walden <[jwalden@wmhlaw.com](mailto:jwalden@wmhlaw.com)>; Peter A. Devlin <[pdevlin@wmhlaw.com](mailto:pdevlin@wmhlaw.com)>  
**Cc:** Daniel Chirlin <[dchirlin@wmhlaw.com](mailto:dchirlin@wmhlaw.com)>; Ammirato, Michael (SLA) <[Michael.Ammirato@sla.ny.gov](mailto:Michael.Ammirato@sla.ny.gov)>  
**Subject:** Re: MSGE - SLA

**External Email - Caution before clicking links.**

Hello,

No, I did not miss it. Actually, I acknowledged receipt in the previous email of the first and second productions. I pasted below for reference along with the due date in writing for the Spreadsheet information, 01/24/23, a date of your choosing, which was the day before the intended interview date that was to be tomorrow. See the highlighted text below for written reference.

Please let me know when I can expect the Spreadsheet data and the actual date when Mr. Burian departed the company which was also part of that promised production?

Your cooperation is much appreciated.

CS

Sincerely,

Charles R. Stravalle  
Investigative Specialist 1, Beverage Control, NYS Peace Officer

New York State Liquor Authority  
Enforcement Bureau, Zone 1  
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[www.sla.ny.gov](http://www.sla.ny.gov)  
Cell (917) 589-3128  
Fax (212) 961-8381

---

**From:** Stravalle, Charles (SLA) <[Charles.Stravalle@sla.ny.gov](mailto:Charles.Stravalle@sla.ny.gov)>  
**Date:** Monday, January 23, 2023 at 4:36 PM  
**To:** Jim Walden <[jwalden@wmhlaw.com](mailto:jwalden@wmhlaw.com)>  
**Cc:** Peter A. Devlin <[pdevlin@wmhlaw.com](mailto:pdevlin@wmhlaw.com)>, Daniel Chirlin <[dchirlin@wmhlaw.com](mailto:dchirlin@wmhlaw.com)>, Ammirato, Michael (SLA) <[Michael.Ammirato@sla.ny.gov](mailto:Michael.Ammirato@sla.ny.gov)>  
**Subject:** Re: Question Subpoena Ad Testificandum-James Dolan (Second Request)  
**External Email - Caution before clicking links.**

Hello,

Sorry, I'm unavailable via phone, please send me an email.

Many thanks.

CS

Sincerely,

Charles R. Stravalle  
Investigative Specialist 1, Beverage Control, NYS Peace Officer

New York State Liquor Authority  
Enforcement Bureau, Zone 1  
163 West 125 Street, 8th floor  
New York, New York 10027  
Office (347) 291-2047 | [charles.stravalle@sla.ny.gov](mailto:charles.stravalle@sla.ny.gov)  
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Cell (917) 589-3128  
Fax (212) 961-8381

**From:** Jim Walden <[jwalden@wmhlaw.com](mailto:jwalden@wmhlaw.com)>  
**Sent:** Monday, January 23, 2023 3:50 PM  
**To:** Stravalle, Charles (SLA) <[Charles.Stravalle@sla.ny.gov](mailto:Charles.Stravalle@sla.ny.gov)>  
**Cc:** Peter A. Devlin <[pdevlin@wmhlaw.com](mailto:pdevlin@wmhlaw.com)>; Daniel Chirlin <[dchirlin@wmhlaw.com](mailto:dchirlin@wmhlaw.com)>; Ammirato, Michael (SLA) <[Michael.Ammirato@sla.ny.gov](mailto:Michael.Ammirato@sla.ny.gov)>  
**Subject:** RE: Question Subpoena Ad Testificandum-James Dolan (Second Request)

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I tried to call you. Give me a call please.

Jim Walden  
**Walden Macht & Haran LLP**  
250 Vesey Street, 27<sup>th</sup> Floor  
New York, New York 10281  
O: (212) 335-2031  
C: (646) 645-6377  
[jwalden@wmhlaw.com](mailto:jwalden@wmhlaw.com)  
[www.wmhlaw.com](http://www.wmhlaw.com)

*Note our new address effective January 1, 2021*

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**From:** Stravalle, Charles (SLA) <[Charles.Stravalle@sla.ny.gov](mailto:Charles.Stravalle@sla.ny.gov)>  
**Sent:** Monday, January 23, 2023 3:46 PM  
**To:** Jim Walden <[jwalden@wmhlaw.com](mailto:jwalden@wmhlaw.com)>  
**Cc:** Peter A. Devlin <[pdevlin@wmhlaw.com](mailto:pdevlin@wmhlaw.com)>; Daniel Chirlin <[dchirlin@wmhlaw.com](mailto:dchirlin@wmhlaw.com)>; Ammirato, Michael (SLA) <[Michael.Ammirato@sla.ny.gov](mailto:Michael.Ammirato@sla.ny.gov)>  
**Subject:** Question Subpoena Ad Testificandum-James Dolan (Second Request)

**External Email - Caution before clicking links.**

Hello,

Hope all is well.

With respect to the MSG demands, this is the SLA's interview of an MSG Arena LLC licensed principal. At this point in time, there are no demands that can be made and whatever information you provide will be used for purposes of potential litigation. In terms of documents provided, please indicate the proposed redactions.

Associate General Counsel Ammirato has indicated that topics will be general business, operations, and the creation and implementation of the exclusion policy and any other ABC Law or Rules of the Authority potential violations. The SLA is planning to record the interview, and you will be provided a copy. Attendees cannot attend with a recording device or record the interview. All information provided can and will be used for SLA purposes. The SLA will not consider the information FOIL exempt if a request is permissible under FOI Law.

As far as the 25<sup>th</sup> is concerned, this was a date of your choosing (See below), perhaps your ABCL attorney could appear in your stead or perhaps one of your colleagues.

Please send the names and email addresses of the intended participants so that I may provide the Webex invitation link.

Many thanks for your cooperation and understanding.

CS

Sincerely,

Charles R. Stravalle  
Investigative Specialist 1, Beverage Control, NYS Peace Officer

New York State Liquor Authority  
Enforcement Bureau, Zone 1  
163 West 125 Street, 8th floor  
New York, New York 10027  
Office (347) 291-2047|[charles.stravalle@sla.ny.gov](mailto:charles.stravalle@sla.ny.gov)  
[www.sla.ny.gov](http://www.sla.ny.gov)  
Cell (917) 589-3128  
Fax (212) 961-8381

Previous correspondence:

Charlie:

Thank you for your time yesterday. As promised, attached is a notice of appearance and below is a schedule for the document productions and interview we discussed. After you send the list of likely interview topics, we will reassess whether any other company officers or employees should attend the meeting to ensure that all your questions are addressed without the need for multiple sessions.

- **By 1/13** – MSGE (Madison Square Garden Entertainment Corp.) will produce all exclusion letters sent to law firms pursuant to its adverse attorney policy, the first of which was sent on 6/24/22.
- **By 1/20** – MSGE will produce all exclusion letters sent to other persons over the two-year period of 2021 through 2022.
- **We will schedule an interview with Marc Schoenfeld, who is an officer of the licensee entity MSG Arena LLC and signed the most recent renewal application in that capacity, as well as Hal Weidenfeld (SVP and Associate General Counsel at MSGE), for 1/23, 1/24, or 1/25.**

We are available if you have further questions. Enjoy the weekend,

Peter A. Devlin (he/him)  
Walden Macht & Haran LLP  
250 Vesey Street, 27th Floor  
New York, New York 10281  
O: (212) 335-2388  
C: (215) 279-2749  
[pdevlin@wmhlaw.com](mailto:pdevlin@wmhlaw.com)  
[www.wmhlaw.com](http://www.wmhlaw.com)

**A production of letters was received on 1/13/23 and 1/20/23**

1. Notice of Appearance (blank copy attached for your convenience) **Received 01/07/23**
2. The **date** that Mr. Lawrence Burian departed the company as he is still listed as a principal **Not Received and not mentioned in the email, the exact date of his departure was not indicated.**
3. **Exclusion List** with justification for each person being banned (not just attorneys but any others as well with justification-records dating back 24 months.) **Not Received not mentioned in the email-Spreadsheet to be produced 1/24/23**
4. Names of those persons excluded, to date. To include the date, time, event, location address, venue name, and the ejecting official, same time frame as above. **Not Received and not mentioned in the email-Spreadsheet to be produced 1/24/23**
5. Whether the exclusion extends to restaurants and affiliates under the Tao Group, i.e., Lavo and others with business interest **Not Received and not mentioned in the email-to be answered on 1/24/23.**

**This is a copy of a pleading filed electronically pursuant to New York State court rules (22 NYCRR §202.5-b(d)(3)(i)) which, at the time of its printout from the court system's electronic website, had not yet been reviewed and approved by the County Clerk. Because court rules (22 NYCRR §202.5[d]) authorize the County Clerk to reject filings for various reasons, readers should be aware that documents bearing this legend may not have been accepted for filing by the County Clerk.**

6. Three dates and times after the new year (in January 2023) when Mr. Dolan can participate in an interview to discuss the policy, development and implementation. A person(s) with knowledge of the exclusion policy, development of said policy, and implementation must be available with him. While I would prefer in person, I would not be opposed to WebEx for convenience. Also, a person with knowledge of business practices of MSG. Please send me the names in advance. Three dates were proposed by MSG (1/23, 24, 25) on 01/07/23 along with Mr. Weidenfeld and Mr. Schoenfeld as participants as well as now Mr. Dolan under subpoena

Please arrange for the quick call that we discussed so that I can personally inform Mr. Dolan. This was not done

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**From:** Jim Walden <jwalden@wmhlaw.com>

**Sent:** Tuesday, January 24, 2023 8:07 PM

**To:** Peter A. Devlin <pdevlin@wmhlaw.com>; Stravalle, Charles (SLA) <Charles.Stravalle@sla.ny.gov>

**Cc:** Daniel Chirlin <dchirlin@wmhlaw.com>; Ammirato, Michael (SLA) <Michael.Ammirato@sla.ny.gov>

**Subject:** Re: MSGE - SLA

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Charlie:

Further to Pete's email, the claim that we are in "default" of an agreed-upon, voluntary production is inaccurate and unfounded. And, we still intend to produce the spreadsheet you requested, again voluntarily.

Best regards,

Jim

Jim Walden  
**Walden Macht & Haran LLP**  
250 Vesey Street, 27<sup>th</sup> Floor  
New York, New York 10281  
O: (212) 335-2031  
C: (646) 645-6377  
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www.wmhlaw.com

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**From:** Peter A. Devlin <pdevlin@wmhlaw.com>

**Date:** Tuesday, January 24, 2023 at 7:54 PM

**To:** Stravalle, Charles (SLA) <Charles.Stravalle@sla.ny.gov>

**Cc:** Jim Walden <jwalden@wmhlaw.com>; Daniel Chirlin <dchirlin@wmhlaw.com>; Ammirato, Michael (SLA) <Michael.Ammirato@sla.ny.gov>

**Subject:** FW: MSGE - SLA

Charlie,

I saw your note just now to Jim. You may have missed this, but we sent the second production to you last Friday. I'm forwarding it again to you now, see below.

Kind regards,

Peter A. Devlin (he/him)  
**Walden Macht & Haran LLP**  
250 Vesey Street, 27th Floor  
New York, New York 10281  
O: (212) 335-2388  
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**From:** Peter A. Devlin

**Sent:** Friday, January 20, 2023 2:57 PM

**To:** 'Stravalle, Charles (SLA)' <Charles.Stravalle@sla.ny.gov>

**Cc:** 'Michael.Ammirato@sla.ny.gov' <Michael.Ammirato@sla.ny.gov>; Jim Walden <jwalden@wmhlaw.com>; Daniel Chirlin <dchirlin@wmhlaw.com>

**Subject:** RE: MSGE - SLA

Dear Mr. Stravalle:

**This is a copy of a pleading filed electronically pursuant to New York State court rules (22 NYCRR §202.5-b(d)(3)(i)) which, at the time of its printout from the court system's electronic website, had not yet been reviewed and approved by the County Clerk. Because court rules (22 NYCRR §202.5[d]) authorize the County Clerk to reject filings for various reasons, readers should be aware that documents bearing this legend may not have been accepted for filing by the County Clerk.**

Please see the attached letter for MSGE's second production related to this matter. We have uploaded the production to a secure FTP site: <https://securisync.intermedia.net/us2/s/3Hohy5bbXKuzgsZPLfTO1N0033d4a6>. We will circulate the password for the FTP site separately. The Bates range for the production is MSGE-SLA\_000403 to MSGE-SLA\_000446. The production is contained within an encrypted zip file. The password for the zip file is: **horse fr@m blue!**

Please let me know if you have any problems accessing the documents.

Kind regards,

Peter A. Devlin (he/him)  
**Walden Macht & Haran LLP**  
250 Vesey Street, 27th Floor  
New York, New York 10281  
O: (212) 335-2388  
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[pdevlin@wmhlaw.com](mailto:pdevlin@wmhlaw.com)  
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**From:** Peter A. Devlin  
**Sent:** Friday, January 13, 2023 3:35 PM  
**To:** Stravalle, Charles (SLA) <[Charles.Stravalle@sla.ny.gov](mailto:Charles.Stravalle@sla.ny.gov)>  
**Cc:** [Michael.Ammirato@sla.ny.gov](mailto:Michael.Ammirato@sla.ny.gov); Jim Walden <[jwalden@wmhlaw.com](mailto:jwalden@wmhlaw.com)>; Daniel Chirlin <[dchirlin@wmhlaw.com](mailto:dchirlin@wmhlaw.com)>  
**Subject:** MSGE - SLA

Dear Mr. Stravalle:

Please see the attached letter. We have uploaded the production to a secure FTP site: <https://securisync.intermedia.net/us2/s/u7Gb3yOTI1hJkMJVIC8IT00033d4a6>. We will circulate the password for the FTP site separately. The Bates range for the production is MSGE-SLA\_000001 to MSGE-SLA\_000402. The production is contained within an encrypted zip file. The password for the zip file is: **class roger 6433 horse Blog!**

Please let me know if you have any problems accessing the documents.

Kind regards,

Peter A. Devlin (he/him)  
**Walden Macht & Haran LLP**  
250 Vesey Street, 27th Floor  
New York, New York 10281  
O: (212) 335-2388  
C: (215) 279-2749  
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[www.wmhlaw.com](http://www.wmhlaw.com)

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