AVOWAL
POWERED BY ELARIA

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Appearing Pro Se

JULY 10, 2026

VIA EMAIL & CERTIFIED U.S. MAIL

TO

Glass House Engagement Partner
Public Company Audit Practice Leadership
Macias Gini & O'Connell LLP (MGO)
111 Pacifica, Suite 300
Irvine, CA 92618-3705

RE

Voluntary accounting and audit inquiry concerning ASC 810, ASC 850, Rule 10A-3, related-party completeness, ITGCs, Kings Bay, Beach Front, and NSJB

Dear Glass House Engagement Partner and Audit Practice Leadership,

I write in good faith to request information, records, and clarification concerning the relationships among Dalton Investments, Rosenwald Capital Management, Kings Bay, Rosenwald Partners, Beach Front, and Glass House Brands. This is a broad inquiry because the publicly disclosed ownership, financing, personnel, family, advisory, real-estate, insurance, and governance relationships cross entity lines.

This letter does not accuse any person or entity of misconduct. It asks you to confirm, correct, or explain my understanding and to provide the records that permit an informed assessment. Where I rely on first-hand experience rather than a public filing, I say so expressly.

Please respond within 21 days. If you cannot complete the response in that period, identify what you can provide, designate a response coordinator, and give a firm production schedule. If a premise is wrong, please state the correction and provide the record that resolves it.

BASIS FOR INQUIRY

- MGO has served as Glass House auditor since 2020. Public filings identify an unresolved ITGC material weakness and a June 2026 deconsolidation resting on significant judgments and unfiled agreements.

SCOPE AND INDEPENDENCE

1. Confirm the periods and services for which MGO served Glass House and provide engagement letters, non-audit-service schedules, fee approvals, and Rule 2-01 independence communications to the audit committee.
2. Identify all relationships considered in assessing audit-committee member independence and MGO independence, including Beach Front, RCM, Dalton, Kings Bay, and family entities.

ASC 810 DECONSOLIDATION

3. Produce the complete ASC 810 consolidation/deconsolidation and VIE memoranda, including substantive equity at risk, power, economics, protective versus participating rights, related parties, de facto agents, common control, and reconsideration events.
4. Produce the NSJB Purchase Note, Consulting or Management Services Agreement, repurchase and put-note forms, all schedules and statements of work, side letters, escrow records, lender consent, indemnities, guarantees, working-capital commitments, tax-sharing arrangements, and DCC/local approvals.
5. Identify NSJB's beneficial owners, capitalization, bank funding, source of funds, and every prior relationship with Glass House, Beach Front, Dalton, RCM, Kings Bay, the Rosenwald family, JML Law, or company insiders.
6. Explain whether seller financing and the note-offset mechanism supplied substantive independent equity at risk.
7. Reconcile Ex. 99.5's use of $29.935 million as 'net assets' with the same exhibit's removal of $25.016 million of liabilities.
8. Produce final journal entries, valuation of the retained interest, actual closing accounting, auditor consultation or concurrence, audit-committee materials, and any correction or revision of the reported $11.415 million pro forma loss.

RELATED PARTIES AND CONTROLS

9. Describe audit procedures over related-party completeness, counterparty beneficial ownership, insider questionnaires, vendor/entity masters, journal entries, leases, preferred financing, consulting, insurance, and note conversions.
10. Explain how the unresolved ITGC weakness affected audit evidence over revenue, inventory, related parties, and the systems used for the GHR transaction.
11. Confirm whether Kings Bay's RCM management and concentrated related-person ownership were considered in the issuer's related-party disclosures.
12. Identify audit differences, proposed adjustments, control deficiencies, significant risks, and communications relating to the matters in this letter, without disclosing privileged material if a lawful basis applies.

PRESERVATION AND PRODUCTION

13. Preserve all responsive documents and electronically stored information from January 1, 2017 to the present, including email, text messages, Signal and WhatsApp messages, calendars, visitor logs, cloud drives, accounting systems, cap tables, board portals, deal rooms, compliance systems, trade records, and personal devices used for business.
14. Identify the custodians, systems, accounts, archives, and date ranges searched.
15. For any withheld document, provide a log stating its date, sender, recipients, general subject, custodian, and the basis for withholding.
16. If a responsive record is held by an affiliate, administrator, custodian, broker, auditor, law firm, regulator, or service provider, identify that holder and request the record or authorize its release.
17. Produce records electronically in native format where available, with searchable text and ordinary metadata preserved. Rolling production is welcome.

CLOSING

I welcome straightforward explanations and corrections. Please do not answer only for the formal legal entity if responsive information is held by an affiliate or service provider. The purpose is to obtain a coherent account of the relationships and the records needed to understand who invested, who advised, who controlled, who was paid, who approved each transaction, and what was disclosed to clients, investors, auditors, exchanges, and regulators.

Respectfully,

ABRAHAM ROSENWALD

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