Mail-Ready Records Request Package

Date: July 10, 2026 Prepared for: [REQUESTER NAME] Address: [ADDRESS] Email: [EMAIL] Telephone: [PHONE]

Instructions: - Replace bracketed requester fields before sending. - Submit only requests you are legally entitled to make. - Public-record laws do not compel a private company, auditor, bank, trust or fund to respond. Those letters are voluntary diligence requests unless served through lawful discovery/regulatory process. - Do not request tax returns or investor identities from an agency without a lawful basis; many records are protected.

Global public-record preamble

Please construe this request broadly but conduct a targeted search. If any portion of a responsive record is exempt, please produce all reasonably segregable non-exempt portions. Please provide records electronically in native format where available, with metadata preserved. If records are withheld or redacted, identify the exemption and provide an index or log sufficient to evaluate the withholding. Please provide rolling productions. If clarification or narrowing would avoid denial or materially reduce fees, please contact me before denying or closing the request. I request advance notice before fees exceed $50.

Request 1 — SEC FOIA: Dalton and Rosenwald Capital regulatory history

To: U.S. Securities and Exchange Commission, FOIA Office Submit: https://www.sec.gov/foia-services/submit-foia-request

Subject: FOIA request — Dalton Investments and Rosenwald Capital Management adviser records

Dear FOIA Officer:

Under the Freedom of Information Act, I request records dated January 1, 1999 through July 10, 2026 concerning the following advisers and predecessors/successors:

1. Dalton Investments LLC, CRD 109538, SEC file 801-56572;
2. Dalton Investments, Inc., CRD 308609, SEC file 801-121986;
3. Rosenwald Capital Management, Inc., current CRD 290118, SEC file 801-112520;
4. Rosenwald Capital Management, Inc., legacy CRD 104630;
5. Rising Sun Management Ltd., CRD 310497; and
6. James Benno Rosenwald, CRD 1241892.

Requested records:

A. Orders, releases, settled or litigated enforcement matters, referrals that resulted in public action, and publicly releasable closing documents. B. Existence and date information for completed examinations, and any releasable examination closing letters, deficiency letters, responses, undertakings or remediation confirmations. C. Registration succession, withdrawal and termination documents concerning the transition from Dalton Investments LLC to Dalton Investments, Inc. and from legacy RCM CRD 104630 to current RCM CRD 290118. D. Correspondence concerning whether historical disciplinary events, including the 2006 NFA action relating to seven commodity-pool annual reports, were required to be carried forward to a successor filing. E. Publicly releasable records concerning Form ADV accuracy, custody, valuation, related-person reporting, conflicts or private-fund reporting for Kings Bay Investment Co. Ltd. and Rosenwald Partners, L.P.

I recognize that examination and enforcement records may be protected by FOIA Exemptions 4, 5, 7(A), 7(C) or other provisions. If substantive records are withheld, please disclose non-exempt existence/date/status information and segregable portions where permitted.

[GLOBAL PREAMBLE]

Sincerely, [REQUESTER NAME]

Request 2 — NFA: Dalton 2006 final decision

To: National Futures Association, Information Center Submit: https://www.nfa.futures.org/contact-us/index.html

Subject: Public disciplinary record request — Dalton Investments, 2006 NFA final decision

Dear Information Center:

Please provide the complete publicly available record for the NFA matter disclosed in Rosenwald Capital Management's historical Form ADV, described as follows:

- Respondent/advisory affiliate: Dalton Investments;
- Allegation: failure to timely file December 31, 2005 annual reports for seven pools;
- Offer of settlement executed August 25, 2006;
- Fine: $10,000;
- Final decision date: October 12, 2006.

Please include the complaint/notice, offer of settlement, final decision, case number, pool names, filing dates and any publicly releasable compliance disposition.

Sincerely, [REQUESTER NAME]

Request 3 — California Secretary of State: certified Beach Front entity histories

To: California Secretary of State, Business Programs Division Submit through: https://bizfileonline.sos.ca.gov/

Subject: Certified entity-record order — Beach Front/Rosenwald entity corpus

Please provide certified entity histories and all publicly available filed documents, including formation documents, Statements of Information, amendments, conversions, mergers, cancellations, agent changes and status history, for exact-name and close-variant records for:

1. Beach Front Properties LLC;
2. Beach Front Property Management Inc.;
3. Beach Front I LLC;
4. Beach Front II LLC;
5. Beach Front III LLC;
6. Beach Front IV LLC;
7. Beach Front VIII LLC;
8. 24818 Eshelman LLC;
9. 23330 Arlington LLC;
10. Lamlex LLC;
11. 1223 Anaheim Street LLC;
12. Beach Vault LLC;
13. NPI B.F. Ventures LLC;
14. Park Rolling Hills, LLC;
15. Pacific Alliance Capital LLC;
16. Emerald Park LLC;
17. Emerald Park Manager LLC;
18. PGE Marquis Operator LLC;
19. 3645 Long Beach LLC;
20. Neo Street Partners LLC;
21. Isla Vista GHG LLC;
22. 5042 Real Estate Investment LLC;
23. 2000 De La Vina LLC; and
24. Jon A. Neu Insurance Services, Inc. and close variants.

For each entity, please include entity number, initial filing date, jurisdiction/type, current status, registered agent, principal and mailing addresses, managers/officers disclosed in filed statements, and document images.

Sincerely, [REQUESTER NAME]

Request 4 — California UCC: certified debtor-name searches

To: California Secretary of State, Uniform Commercial Code Unit Submit through the current UCC search/order procedure at https://bizfileonline.sos.ca.gov/

Subject: Certified UCC debtor-name searches — Beach Front/Rosenwald entities

Please conduct certified exact and standard-search-logic debtor searches, including lapsed filings where available, for each entity listed in Request 3 and for:

- Rosenwald Capital Management, Inc.;
- Dalton Investments LLC;
- Dalton Investments, Inc.;
- Kings Bay Investment Company Ltd.;
- Kings Bay Capital Management Ltd.;
- GH Group, Inc.; and
- Glass House Brands Inc.

Requested date range: January 1, 1997 through July 10, 2026.

For every responsive initial financing statement, amendment, continuation, assignment, termination and information statement, provide filing number/date, secured party, debtor address, collateral description and document image where public.

Sincerely, [REQUESTER NAME]

Request 5 — County recorder/title searches

Send separately to the recorder/assessor or a licensed title-information provider in Los Angeles, Santa Barbara, Ventura, Orange, Riverside and San Bernardino Counties.

Subject: Grantor/grantee and lien index search — Beach Front entity corpus

Please search the grantor/grantee, deed of trust, assignment, reconveyance, judgment lien, tax lien and miscellaneous-record indexes from January 1, 1997 through July 10, 2026 for every exact and close variant in Request 3.

For each hit, provide:

- recording number/date;
- document type;
- grantor and grantee;
- property address and APN/legal description;
- stated consideration or secured amount;
- cross-referenced documents;
- current vesting where available; and
- document image or ordering instructions.

This request seeks public index and recorded-document information only. It does not ask the assessor to create a new report or disclose information protected by law.

Sincerely, [REQUESTER NAME]

Request 6 — Glass House Brands: Rosenwald/Kings Bay/related-party diligence

To: Investor Relations; Corporate Secretary; Chair of the Audit Committee
Company: Glass House Brands Inc.

Subject: Shareholder diligence request — Rosenwald, Dalton, RCM, Kings Bay and Beach Front relationships

Dear Corporate Secretary and Audit Committee Chair:

For investor diligence, please provide or publicly clarify the following:

1. The legal identity and relationship of Kings Bay Investment Company Ltd. and Kings Bay Capital Management Ltd., including whether they are distinct entities, successor/assignor entities or vehicles under common management.
2. The identity of the investment adviser/manager and controlling persons of Kings Bay at the time of the 2018 note, March 2020 assignment, April 2020 modification, June 2021 conversion and 2024–2025 GLAS dispositions.

3. The original Kings Bay Note, co-lending agreement, March 2020 assignment, April 2020 assignment/novation/modification agreement, security agreement and June 2021 conversion/release documents.
4. The original principal; the disclosed post-modification 6.00% coupon and March 2023 maturity; any original/pre-modification terms; conversion price; accrued interest; number/class of shares issued; and recipient at conversion.
5. The audit committee's related-party determination and approval record for the Kings Bay transactions.
6. A reconciliation of the company's historic disclosure that Rosenwald Capital Management advised the Jocelyn May Rosenwald Trust—not GLAS—with any separate advisory, treasury, investment, financing or consulting services RCM or Dalton provided to GLAS, GH Group or a subsidiary.
7. Confirmation whether Dalton, RCM, Kings Bay, Rosenwald Partners, Beach Front entities or any vehicle controlled by James B. Rosenwald III currently holds GLAS debt, equity, options, warrants, swaps, guarantees or other variable interests.
8. All agreements, guarantees, letters of credit, support arrangements, side letters or informal understandings between GLAS/GH Group/ subsidiaries and those persons/entities.
9. The current related-party register and board/audit-committee approvals for Beach Front and Rosenwald-connected transactions, including the September 28, 2020 consulting agreement and the February 2021 $2 million / 15% note conversion.
10. The filed NYSE foreign-private-issuer corporate-governance affirmation, any Rule 10A-3 exemption explanation, and the basis for the board's determination that Jocelyn Rosenwald satisfies Rule 10A-3, including consideration of her RCM directorship, Dalton directorship, RCM's advisory role for the Jocelyn May Rosenwald Trust, Kings Bay's financing/ownership history and family/business relationships.
11. Whether Jocelyn receives direct or indirect compensation from any issuer subsidiary or service provider other than ordinary board/ committee compensation.
12. The board's analysis of whether Kazan, James Rosenwald, Jocelyn Rosenwald, RCM, Dalton, Kings Bay and Beach Front constitute related parties, affiliates, de facto agents or a control group for any accounting, securities or governance purpose.
13. A certification that no undisclosed side arrangement changes the voting, economics, repurchase, financing or control of Glass House Retail/NSJB.
14. The current Form 40-F/AIF/6-K disclosure materiality analysis for the continuing RCM/Kings Bay relationship.
15. The NYSE §314 related-party transaction policy, committee designation, preapproval thresholds, transition review of legacy arrangements and approvals after listing.

16. Counterparty cap tables and named executive/director economic interests for every entity described generically as partially or majority owned by insiders.
17. The participant schedule, allocation, recusals and fairness support for the approximately $13M related-party Series E consideration and approximately $1.5M related-party preferred dividends disclosed for FY2025.

If documents are confidential, please publish a sufficiently detailed summary addressing each item and identify the governing confidentiality basis.

Sincerely, [REQUESTER NAME]

Request 7 — GLAS audit committee / external auditor accounting package

To: Audit Committee Chair, Glass House Brands Inc. Cc: Macias Gini & O'Connell LLP

Subject: Accounting diligence request — ASC 810, ASC 850 and Kings Bay/Rosenwald matters

Please provide or confirm the existence and conclusions of:

A. The ASC 810 consolidation/deconsolidation memo for GHR, including equity-at-risk, power, economics, participating/protective rights, de facto-agent and related-party analyses. B. The ASC 850 related-party analysis covering RCM, Dalton, Kings Bay, Rosenwald Partners, Beach Front, NSJB and JML Law principals. C. The audit committee minutes and auditor communications concerning those analyses. D. The executed NSJB Purchase Note, source-of-funds evidence, recourse/security/maturity terms, offset provisions and lender consent. E. The GHR management/services, supply, IP, lease, cash-management and working-capital agreements. F. The valuation report for retained GHR units and the final deconsolidation gain/loss computation. G. The Kings Bay debt-modification and conversion accounting workpapers, including the $389,000 2020 extinguishment loss. H. The related-party representation letters supplied to the auditor for 2019–2026. I. Confirmation whether any tax or accounting position depends on Kings Bay, RCM, Dalton, Beach Front or NSJB being independent or unrelated. J. Confirmation that no oral agreement, side letter, guarantee or support undertaking changes any disclosed conclusion. K. Related-party completeness controls, including entity/vendor masters, beneficial-owner screening, annual questionnaires, journal-entry review and audit-committee monitoring during the ITGC remediation period.

This is a voluntary diligence request and not an assertion that the auditor owes a duty to a requesting shareholder or third party.

Sincerely, [REQUESTER NAME]

Request 8 — RCM and Dalton compliance certification

To: Chief Compliance Officer Rosenwald Capital Management, Inc. Dalton Investments, Inc.

Subject: Diligence request — GLAS positions, advice and conflicts

Please provide a written compliance certification, as of each year-end 2018–2026, stating whether any adviser, relying adviser, related person, private fund, SMA, employee account or control person:

1. held GLAS/GH Group equity, exchangeable shares, multiple voting shares, preferred shares, warrants, options, derivatives or debt;
2. participated in Magu Farm/GH Group co-lending or the Kings Bay Note;
3. advised GLAS, GH Group or a subsidiary concerning investments, treasury, financing, restructuring, real estate, insurance or governance;
4. guaranteed, supported or provided a letter of credit for any GLAS obligation;
5. received issuer-paid fees, rent, brokerage/insurance commissions or transaction compensation;
6. shared personnel, records, offices, systems or service providers with Beach Front or a GLAS related party;
7. pre-cleared or restricted trading in GLAS by Kings Bay, Rosenwald Partners or a Rosenwald trust;
8. considered GLAS on a restricted/watch list; or
9. identified an actual or potential conflict involving Jocelyn Rosenwald's GLAS audit-committee role.

Please also provide:

- current and historic Codes of Ethics;
- personal-trading policies and relevant anonymized preclearance logs;
- conflicts committee minutes;
- the RCM–Dalton shared-services agreement;

- Kings Bay and Rosenwald Partners audited financial statements; and
- the basis for Form ADV related-person disclosures involving Beach Front.

Investor identities and proprietary positions may be redacted except to the extent needed to confirm GLAS exposure and related-person status.

Sincerely, [REQUESTER NAME]

Request 9 — Cayman Islands / fund administrator package

To: Kings Bay Investment Co. Ltd., its registered office, RCM, JTC Fund Services (Cayman) Ltd., and authorized corporate-record provider

Subject: Corporate and fund-record request — Kings Bay Investment Co. Ltd.

Please provide, to the extent publicly available or with fund authorization:

1. Certificate of incorporation, certificate of good standing and all name-change certificates.
2. Memorandum and articles of association and amendments.
3. Register of directors/officers from 2018–2026.
4. Register of members/beneficial owners, with sensitive data redacted but percentages and related-person status retained.
5. CIMA registration category, number, status and filings.
6. Investment-management agreement with RCM and any prior agreement with Dalton.
7. Audited financial statements and PwC audit opinions for 2018–2026.
8. GLAS/GH Group investment ledger, note documents, conversion ledger and disposal records.
9. Relationship to Kings Bay Capital Management Ltd.
10. Liquidation/dissolution/redemption records, if any, after the December 2025 GLAS position reached zero.

Sincerely, [REQUESTER NAME]

Request 10 — Tax diligence package (company request)

To: Chief Financial Officer / Tax Director, Glass House Brands Inc.

Subject: Tax diligence request — GHR deconsolidation, §280E and cross-border structure

Please provide or summarize:

1. GHR's tax classification before and after June 12, 2026 and all Forms 8832.
2. Federal and California transaction memorandum addressing §§351, 721, 1001, 267, 318, 482, 707 and consolidated/combined return membership.
3. Tax basis and fair-market-value schedules for transferred assets, liabilities and retained units.
4. Deferred-tax analysis for the book deconsolidation result.
5. Medical/adult-use §280E allocation methodology after April 28, 2026.
6. Transfer-pricing support for services, cultivation, inventory, IP, financing, rent and shared personnel between retained companies and GHR.
7. Canadian T2, Schedule 21, T106 and T1134 filing-position summaries.
8. U.S. parent-level Form 1120-F/8833 position, if any.
9. Kings Bay W-8BEN-E, Forms 1042/1042-S and portfolio-interest/withholding analysis.
10. FIRPTA certifications for related-party real-estate acquisitions where applicable.

Tax returns may be redacted; reconciliations and conclusions are sufficient for this voluntary request.

Sincerely, [REQUESTER NAME]

Request 11 — Political contribution and pay-to-play records

To: RCM and Dalton Chief Compliance Officers

Subject: Advisers Act Rule 206(4)-5 diligence request

Please confirm whether James B. Rosenwald III, Jocelyn Rosenwald, RCM, Dalton, covered associates or controlled PACs made contributions from January 1, 2018 through July 10, 2026 to officials or candidates with authority over any current/prospective government-entity client.

Please provide:

- covered-associate lists;
- contribution preclearance logs;
- returned contribution records;
- government-client list by state (names may be anonymized if needed);
- two-year time-out analyses; and
- compliance testing results.

This request does not allege a pay-to-play violation. It seeks to close a public-data gap because donor-name matching cannot establish covered-associate status, client nexus or exceptions.

Sincerely, [REQUESTER NAME]

Request 12 — GLAS beneficial ownership / group analysis

To: Corporate Secretary and securities counsel, Glass House Brands Inc.

Subject: Beneficial ownership and group-analysis diligence

Please provide the company's analysis, as of the 2021 transaction and each annual meeting thereafter, of:

1. Voting/proxy agreements among Kyle Kazan, Graham Farrar, James B. Rosenwald III, Jocelyn Rosenwald and their trusts/vehicles.
2. Investor-rights, registration-rights, lockup, earnout and board-designation agreements.
3. Whether any holders agreed to act together in acquiring, holding, voting or disposing of a registered class for Exchange Act §13(d)/Rule 13d-5 purposes.
4. Canadian early-warning and SEDI reporting compliance.
5. The effect of NYSE registration and any 2026 statutory/rule changes on U.S. beneficial-ownership and insider-reporting obligations.
6. The corrected founder voting-power figures: approximately 76% non-diluted and 64.6% diluted at FY2025.

Sincerely, [REQUESTER NAME]

Tracking sheet

Request	Sent date	Portal/ email	Confirmation no.	Statutory due date	Follow-up date	Status
SEC FOIA						Draft
NFA						Draft
CA SOS certified records						Draft
CA UCC						Draft
County recorder searches						Draft
GLAS corporate request						Draft
Audit committee/ auditor						Draft
RCM/ Dalton CCO						Draft
Cayman records						Draft
Tax package						Draft
Political/ pay-to-play						Draft
Ownership/ group analysis						Draft

Highest-value sequence

1. Current RCM/Dalton ADV preservation — completed in research file.
2. Kings Bay Cayman ownership/financials and KBCM relationship.
3. Original Kings Bay note and conversion ledger.
4. Jocelyn independence questionnaire and board determination.

5. Rosenwald Partners investor/position certification.
6. Certified Beach Front SOS/UCC/property histories.
7. GLAS ASC 810/ASC 850 and tax memoranda.
8. SEC FOIA/NFA records.
9. Political-contribution Rule 206(4)-5 compliance certification.
10. Section 13 group and Canadian reporting opinion.