

BUXTON HELMSLEY

December 18, 2025

**VIA EMAIL TO STEVEN MYHILL-JONES (SMJ@DAILYJOURNAL.COM) AND
BRIAN CARDILE (BCARDILE@JOURNALTECH.COM)**

Daily Journal Corporation
915 East First Street
Los Angeles, CA 90012
Attn: Board of Directors – All Members
Brian Cardile, Secretary

Re: Daily Journal Corporation (“DJCO” or the “Company”) – Additional Section 16 Violations Identified

Dear Members of the DJCO Board of Directors (the “Board”):

Following our letter of December 17, 2025, regarding the appointment of Erik Nakamura as Chief Financial Officer, we have now discovered an additional compliance failure that warrants immediate attention. Our December 13, 2025 letter identified years-long Section 16(a) reporting failures by Audit Committee members John B. Frank and Mary Murphy Conlin. We have now discovered that the third member of the Audit Committee—Rasool Rayani—has the *same compliance failures*. Mr. Rayani joined the Board in June 2024. To date, eighteen months later, no Form 3 has ever been filed on his behalf. Additionally, no Form 4 has been filed to report the equity compensation he received, which the Company's own proxy statement discloses as \$8,172.

To summarize: the Company recently filed delinquent Form 3 and Form 4 reports for Mr. Frank and Ms. Conlin—apparently believing it had remedied its Section 16 compliance failures. Yet somehow, in the course of this remediation, neither the Company, its management, its outside counsel, nor any member of the Audit Committee noticed that the third Audit Committee member had no filings at all. This is not a clerical oversight. Compliance is a function at DJCO that clearly does not exist, even with the Company's new “Director of SEC Reporting”.

Every single member of the Company's Audit Committee has violated Section 16(a), and Rasool Rayani is actively violating Section 16(a). The committee charged with overseeing the Company's financial reporting and internal controls is composed entirely of directors who cannot comply with the most basic SEC reporting obligations. This is the same committee that has overseen the accounting failures we have identified, the same committee that allowed a falsely dated Form 8-K to remain uncorrected for five months, and the same committee whose Chair we have notified (earlier today) of potential referral to the State Bar of California.

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Mr. Rayani should understand that he will not escape scrutiny in the upcoming proxy contest. Our prior correspondence focused on Mr. Frank and Ms. Conlin because, at that time, we believed Mr. Rayani's filings were in order. They are not. Mr. Rayani will be included in all future public communications regarding the Board's systemic compliance failures.

For the avoidance of doubt, we reserve all rights, at law and in equity, and waive none.

Respectfully,



Alexander E. Parker
Chairman of the Board and Chief Executive Officer
Buxton Helmsley USA, Inc.

Cc: Baker Tilly US, LLP
2040 Main Street, Suite 900
Irvine, California 92614
Attn: Daily Journal Corporation Audit Engagement Partner
Daily Journal Corporation Audit Quality Review Partner