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Subject: SEC Correspondence Enclosed — Rule 14a-6(b), Rule 14a-9, and Rule 21F-17(a)
Date: Saturday, December 27, 2025 4:06:00 PM
Attachments: [20251227 - SEC Letter - Supplement \(Exhibit C-Part 2\).zip](#)
[image001.png](#)
[20251227 - SEC Letter - Supplement.pdf](#)
[20251226 - SEC Letter.pdf](#)
[20251227 - SEC Letter - Supplement \(Exhibit A\).pdf](#)
[20251227 - SEC Letter - Supplement \(Exhibit B\).pdf](#)
[20251227 - SEC Letter - Supplement \(Exhibit C-Part 1\).zip](#)
Importance: High
Sensitivity: Confidential

Mr. Cardile:

Attached please find copies of our correspondence to the SEC's Office of the Whistleblower dated December 26, 2025, and December 27, 2025, together with the referenced exhibits. As indicated on the face of those letters, the Company has been copied. The SEC's Enforcement Division is copied on this email.

The attached correspondence documents our formal complaints regarding violations of Rule 21F-17(a) (whistleblower retaliation), Rule 14a-6(b) (failure to file the December 26 press release as solicitation material the same day as distribution), and the anticipated Rule 14a-9 violation that will occur if the Company files the press release without correcting the false statements identified therein, or without attaching all of the underlying correspondence that disproves the statements in the press release.

To be clear: the Company cannot cure its Rule 14a-6(b) violation by belatedly filing a DEFA14A. The press release was disseminated to shareholders via GlobeNewswire on December 26, purposely omitting the underlying correspondence that would allow shareholders to evaluate the Company's characterizations, to poison the proxy contest for DJCO's 2026 Annual Meeting. That solicitation was misleading when it went out, whether it was filed with the SEC the same day or not. A late EDGAR filing does not unring the bell. The violation is complete.

We demand that any DEFA14A filing correct the false statements before submission. The December 27 letter identifies ten categories of false and misleading statements. Filing the press release without correction will constitute a knowing violation of Rule 14a-9, made after a written warning. The Company is also reminded of its obligation not to make false statements in Form 8-K filings.

We continue to reserve all rights and remedies.

Attachments:

1. Letter to SEC Office of the Whistleblower (December 26, 2025);
2. Supplemental Letter to SEC (December 27, 2025);
3. Exhibit A: DJCO Press Release (December 26, 2025);
Exhibit B: Buxton Helmsley Letter to DJCO Board (December 13, 2025); and

4.

5. Exhibit C: Correspondence from December 13 to date.

Very truly yours,
Alexander

Alexander E. Parker

Chairman of the Board and Chief Executive Officer | Buxton Helmsley, Inc.

As seen in The Wall Street Journal, Reuters, Bloomberg, MarketWatch, The Irish Times, and TheStreet.com

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