
Subject: Fwd: Confidential
From: Nuha Sayegh <nuha@recovery-compass.org>
To: Eric Jones <eric@recovery-compass.org>, Nuha Sayegh <Chefnuha@gmail.com>
Date Sent: Sunday, November 2, 2025 1:12:19 AM GMT-07:00
Date Received: Sunday, November 2, 2025 1:12:32 AM GMT-07:00
Attachments: favicon.ico_157964_18349296297_1751674326_n.jpg

Begin forwarded message:

From: gary garykurtzlaw.com <gary@garykurtzlaw.com>

Subject: Re: Confidential

Date: March 18, 2023 at 10:49:46 AM PDT

To: Daniel Gentile <danielkgentile@popeandgentile.com>

Dan

Thank you for sending your appraisal report and your comments. Your appraisal is based on a valuation on January 1, 2019 and based on comps for 2016 to 2019. That was in a bubble of excitement where values spiked. The excitement diminished shortly thereafter, with evidence of a lack of profitability and more alternative properties. Your appraisal does not cover the relevant period, and the Sayegh's appraisal does cover that period.

Your suggestion that the January 2019 represents the current rental value is not sustainable. Attached are some current listings.

16358 Beaver Road is

[https://www.cityfeet.com/cont/listing/16358-beaver-rd-adelanto-ca-92301/cs27098296?
sk=acaed92a40e04087a00ebe16ea2de8b6](https://www.cityfeet.com/cont/listing/16358-beaver-rd-adelanto-ca-92301/cs27098296?sk=acaed92a40e04087a00ebe16ea2de8b6)

The complex on Beaver is valued at 2.00 per square ft for the 10,000 sq ft building. The current valuation for that same size building in the same complex is listed at 0.90. Based on the current market, that should be a very negotiable amount.

The gold standard for cannabis warehouses is the 420 Properties. They are state of the art ground up cultivation facilities designed specifically for cultivation.

In addition to all the power ity has 24 hour gated security, air conditioning and cultivation design.

<https://www.loopnet.com/Listing/9841D-Bartlett-Ave-Adelanto-CA/27851793/>

\$12.00 per foot per year.

<https://www.loopnet.com/Listing/9841D-Bartlett-Ave-Adelanto-CA/27851793/>

The proposals I provided would put your clients in a better position than if they won at trial. They also give the Sayeghs a chance to sell the business as a business and recover some of their losses. It is a win win. The alternative is that my clients get kicked out of the building, move their product to one of the many suitable alternative locations, and leave your clients with an empty, unrented building when there is a glut of unwanted properties on the market. They can't seriously want that.

On Mar 17, 2023, at 6:23 PM, Daniel Gentile <danielkgentile@popeandgentile.com> wrote:

Hi Gary.

Thank you for the detailed proposals. While my clients are willing to consider a lease while the business is marketed and they are willing to consider leasing to a buyer, the payment of rents up front and going forward is insufficient. As reflected in the appraisal, the rental value of comparable Adelanto properties is substantially higher than the value which you've ascribed. Indeed, the accrued rents exceed \$2.2mm. While there may be some flexibility with the rent for a new tenant, the past due rent continues to be a hurdle towards settlement.

The way my clients view it, your clients exclusively used my clients property for 4 years and paid nothing. Your clients have rental property of their own, how would they react if my clients took possession and paid nothing for years.

The only way I see this being resolved based up the demands of my clients is to pay the past rents. Again, I'm open to all discussions, but my clients are demanding the rent. If you have an ny other solution, I'm all ears.

Daniel K. Gentile, Esq.

Pope & Gentile, APC

100 N. Brand Boulevard, Suite 620

Glendale, CA 91203

760.951.7000

760.513.9901

On Mar 17, 2023, at 9:22 AM, Daniel Gentile <danielkgentile@popeandgentile.com> wrote:

I'll be speaking with them again today so if you have anything to pass on, let me know.

Daniel K. Gentile, Esq.

Pope & Gentile, APC

100 N. Brand Boulevard, Suite 620

Glendale, CA 91203

760.951.7000

760.513.9901

On Mar 16, 2023, at 9:16 AM, gary garykurtzlaw.com <gary@garykurtzlaw.com> wrote:

I would like to make a dramatic settlement offer, as follows.

1.

Enter into a 6-month lease a \$0.85 per sq ft, which is what our appraiser says is the value. The lease would be with one of the entities.

2.

Have an option to extend for 5 years with a 3% increase per year. The lease and option have to be assignable.

3.

If we sell the business and a new company takes over the lease, then they get the first \$250,000 from the sale price, we get the next \$250,000, and the proceeds are shared 50/50 until they receive \$1,000,000, and we keep the excess, if any.

4.

If we do not sell the business, we owe them \$600,000. I need your input on how that would be paid.

5.

If rent is not paid and we are evicted, we forfeit the contents of the building.

Gary Kurtz, Esq.

Law Office of Gary Kurtz, Inc.

30101 Agoura Court, Suite 118

Agoura Hills, California 91301

Telephone: 818-884-8400

Telefax: 818-884-8404

Email: Gary@GaryKurtzLaw.com

IMPORTANT

This electronic mail message and any attached files contain information intended for the exclusive use of the individual(s) or entity(ies) to whom it is addressed and may contain information that is proprietary, privileged, confidential and/or exempt from disclosure under applicable law. If you are not the intended recipient or an agent responsible for delivering it to the intended recipient, you are prohibited from viewing, printing, copying, forwarding, disclosing or saving this information. Please notify the sender immediately by electronic mail or telephone, of any unintended recipients and delete the original message without making any copies.

C



LAW SCHOOL