

Matthew M. Clarke, State Bar No. 184959  
[matt@kelleyclarke.com](mailto:matt@kelleyclarke.com)  
Kelley Clarke PC  
604 E. Broadway Street  
Prosper, Texas 75078  
Tel. 805-884-9922  
Fax 866-611-9852

Andrew Flores, State Bar No. 272958  
[Afloreslaw@gmail.com](mailto:Afloreslaw@gmail.com)  
Law Office of Andrew Flores  
427 C Street, Suite 220  
San Diego, California 92101  
Tel. 619-356-1556  
Fax 619-274-8053

Attorneys for Plaintiffs

ELECTRONICALLY FILED  
Superior Court of California,  
County of San Diego

10/23/2025 8:21:08 AM

Clerk of the Superior Court  
By E. SDCourt, Deputy Clerk

**SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR  
THE COUNTY OF SAN DIEGO – CENTRAL DIVISION**

AMY SHERLOCK, an individual and her  
children T.S. and S.S.,

Plaintiffs,

v.

BRADFORD HARCOURT, an individual;  
EULENTIAS DUANE ALEXANDER, an  
individual; STEPHEN LAKE, an individual,  
NINUS MALAN, an individual; SALAM  
RAZUKI, an individual; OLIVE TREE  
PATIENTS ASSOCIATION, a California  
corporation; ALLIED SPECTRUM, INC., a  
California corporation; PRODIGIOUS  
COLLECTIVES, LLC, a limited liability  
company; and DOES 1 through 50, inclusive,

Defendants

Case No.: 37-2021-00050889-CU-AT-CTL

**NOTICE OF MOTION AND MOTION  
FOR LEAVE TO FILE FIRST  
AMENDED COMPLAINT;  
MEMORANDUM OF POINTS AND  
AUTHORITIES; DECLARATION OF  
MATTHEW CLARKE; [proposed]  
ORDER**

**Related Case Nos.:**

37-2017-00010073-CU-BC-CTL  
37-2022-0000023-CU-MC-CTL

DATE: JANUARY 30, 2026  
TIME: 9:00 AM  
DEPT.: 75

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE that on JANUARY 30, 2026, at 10:00 A.M., or as soon thereafter  
3 as the matter may be heard in Department 75 of the above-entitled Court, located at Hall of Justice,  
4 Sixth Floor, 330 W Broadway, San Diego, California 92101, Plaintiff, Amy Sherlock, individually  
5 and as successor-in-interest to Michael Sherlock, deceased, and on behalf of her minor children, will  
6 and hereby does move for leave to file a Second Amended Complaint.

7 This motion is made pursuant to Code of Civil Procedure sections 473(a)(1) and 576, and  
8 California Rules of Court, rule 3.1324, on the grounds that amendment of the pleadings will promote  
9 the ends of justice, that no defendant will suffer prejudice, and that the amendment is necessary to  
10 state claims arising from facts discovered after adjudication of prior pleadings.

11  
12 DATED: October 23, 2025

KELLEY | CLARKE, PC

13 By:   
14 Matthew M. Clarke  
15 Attorneys for PLAINTIFFS  
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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION**

3 Plaintiffs seek leave to file a Second Amended Complaint (“SAC”) to clarify and restate causes  
4 of action consistent with the Court’s prior rulings and to conform to newly discovered evidence  
5 concerning fraudulent transfers of property belonging to the Sherlock family estate.

6 The First Amended Complaint (“FAC”)—filed in December 2021—was substantially  
7 adjudicated through demurrers, anti-SLAPP motions, and appellate rulings concluded in 2024.  
8 Because those pleadings no longer reflect the current procedural posture of the case, leave to amend  
9 is required to present the operative facts and claims fairly and efficiently.

10 **II. THE COURT SHOULD GRANT LEAVE TO FILE A SECOND AMENDED**  
11 **COMPLAINT**

12 **A. Leave to Amend Is to Be Liberally Granted**

13 California courts apply a liberal policy favoring amendments. (*Kittredge Sports Co. v. Superior*  
14 *Court* (1989) 213 Cal.App.3d 1045, 1047.) Under Code Civ. Proc. §§ 473(a)(1) and 576, the Court  
15 may permit amendment “in furtherance of justice.” Unless the opposing party demonstrates actual  
16 prejudice, leave should be freely given. (*Hirsa v. Superior Court* (1981) 118 Cal.App.3d 486, 489.)

17 Plaintiffs’ request is made in good faith, and necessary to incorporate new forensic and  
18 documentary evidence discovered after the first amended complaint was adjudicated.

19 **B. Comparison Between FAC and the SAC**

20 This section discusses and compares the claims in the First Amended Complaint (“FAC”) and  
21 contrasts them against the claims contained within the Second Amended Complaint (“SAC”). The  
22 FAC contained seven causes of action:

23 A. Conspiracy to Monopolize (Cartwright Act)

24 B. Conversion

25 C. Civil Conspiracy

26 D. Declaratory Relief (Balboa CUP)

27 E. Unfair Competition and Unlawful Business Practices (Bus. & Prof. Code § 17200)

1 F. Declaratory Relief (Cotton Judgment)

2 G. Civil Conspiracy (Joint Tortfeasors)

3 The proposed Second Amended Complaint (SAC) narrows the action to four causes of action:

4 A. Conversion;

5 B. Civil Conspiracy;

6 C. Unfair Competition (Bus. & Prof. Code § 17200); and

7 D. Declaratory Relief.

8 This amendment removes antitrust and federal-rights claims and limits the action to the  
9 conversion, conspiracy, and property-based theories that the Court previously found legally viable.

10 Key changes and additions include:

- 11 • Incorporation of new forensic evidence—a December 28, 2023 forensic reconstruction  
12 report concluding that Michael Sherlock’s death was inconsistent with suicide;
- 13 • Inclusion of Eulenthias Alexander’s 2024 admissions that Amy Sherlock retains an  
14 ownership interest in the Ramona Permit and is “owed money”;
- 15 • Addition of forged-document allegations related to a conflict-of-interest waiver executed  
16 without Mrs. Sherlock’s consent;
- 17 • Removal of prior “Strawman/Proxy Practice” allegations that were held not criminally  
18 actionable; and
- 19 • Inclusion of the August 19, 2022, Minute Order confirming that conversion, conspiracy,  
20 declaratory-relief, and UCL claims were properly pleaded.

21 The SAC thus narrows the scope of the litigation, updates the factual record, and conforms to  
22 the Court’s earlier rulings while eliminating obsolete or overbroad claims.

### 23 **III. GOOD CAUSE EXISTS FOR AMENDMENT**

24 Good cause supports amendment under Code Civ. Proc. §§ 473(a)(1) and 576 and Rule  
25 3.1324(b). The proposed SAC arises from substantial evidence discovered after adjudication of the  
26 prior pleadings and during post-judgment investigation: 1) **Forensic Developments**: A December  
27 2023 report by Evidence-Room Forensic Reconstruction concludes that Mr. Sherlock’s death was  
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1 “100 percent inconsistent with suicide,” refuting prior factual assumptions underlying the defense  
2 narrative. 2) **Witness Admissions:** In January and February 2024, Defendant Alexander met with a  
3 licensed investigator and admitted that Mrs. Sherlock remains an owner of the Ramona Permit and is  
4 owed compensation. 3) **Documentary Proof of Forgery:** Records from the Miltner & Menck law  
5 firm show that Mrs. Sherlock’s signature was forged on a conflict-of-interest waiver used to justify  
6 post-mortem transfers of property without probate approval. 4) **Conformance to Prior Rulings:** The  
7 SAC eliminates causes of action previously sustained in part or ruled as non-actionable in the Court’s  
8 August 19, 2022, Minute Order and realleges only those claims the Court found sufficient in law—  
9 conversion, civil conspiracy, unfair competition, and declaratory relief. 4) **No Delay or Prejudice:** No  
10 trial date has been set, no discovery cutoff exists, and all defendants have long been aware of the facts  
11 at issue through related proceedings involving the same properties. The amendment will not require  
12 new discovery or prejudice any party.

13 Under California’s liberal amendment policy, newly discovered evidence and alignment with  
14 existing rulings constitute “furtherance of justice.” (Kittredge Sports Co., supra, 213 Cal.App.3d at  
15 1047.) The SAC ensures that this matter proceeds on the correct and complete factual record rather  
16 than under a superseded pleading.

#### 17 **IV. CONCLUSION**

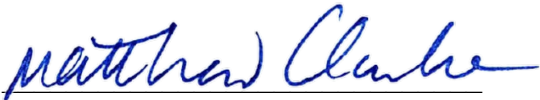
18 The proposed amendment narrows and clarifies the case, incorporates material evidence  
19 discovered in 2023–2024, and conforms the pleading to the Court’s prior rulings. Because it is made  
20 in good faith, will not prejudice defendants, and promotes judicial economy, Plaintiffs respectfully  
21 request that the Court:

- 22 • Grant leave to file the Second Amended Complaint attached as Exhibit A;
  - 23 • Deem the Second Amended Complaint filed as of the date of the Court’s order; and
  - 24 • Grant such other and further relief as the Court deems just and proper.
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DATED: October 23, 2025

KELLEY | CLARKE, PC

By:   
Matthew M. Clarke  
Attorneys for PLAINTIFFS

1                   **DECLARATION OF MATTHEW M. CLARKE IN SUPPORT OF**  
2                   **MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT**

3 I, Matthew M. Clarke, declare as follows:

4           1. I am an attorney licensed to practice before all courts of the State of California and am  
5 counsel of record for Plaintiffs Amy Sherlock, individually and on behalf of minors T.S. and S.S. in  
6 this action. I have personal knowledge of the matters stated below, and if called as a witness I could  
7 and would competently testify to them.

8           2. This declaration is submitted in support of Plaintiffs' Motion for Leave to File a Second  
9 Amended Complaint ("SAC").

10          3. I have attached a true and correct copy of the proposed Second Amended Complaint to this  
11 declaration as **Exhibit 1**. I have also attached a true and correct copy of a redline version showing all  
12 additions and deletions in the Second Amendment Complaint as **Exhibit 2**.

13                   **Procedural Background**

14          4. Plaintiffs filed their original Complaint on December 3, 2021, and a First Amended  
15 Complaint ("FAC") later that month. The FAC asserted seven causes of action, including conspiracy  
16 to monopolize under the Cartwright Act, conversion, civil conspiracy, declaratory relief, and unfair  
17 competition. The FAC was adjudicated through demurrers, anti-SLAPP motions, and related appeals  
18 concluded in 2024.

19          5. On August 19, 2022, this Court (Hon. James A. Mangione, Dept. C-75) issued a Minute  
20 Order sustaining the demurrer in part and overruling it in part, holding that Plaintiffs had properly  
21 pleaded causes of action for conversion, civil conspiracy, declaratory relief, and unfair competition,  
22 but not for the alleged "Proxy/Strawman Practice."

23          6. Because of that ruling, and the discovery of new forensic and documentary evidence since  
24 2023, Plaintiffs seek to file the SAC to conform the pleadings to the facts and the Court's directives.

25                   **Newly Discovered Evidence**

26          7. On December 28, 2023, Plaintiffs received a forensic reconstruction report prepared by Scott  
27 Roder of Evidence-Room Forensic Reconstruction (the "Forensic Report"). The Forensic Report  
28 analyzed the physical and ballistic evidence of Michael Sherlock's death and concluded that the

1 manner of death was 100 percent inconsistent with suicide. This evidence directly contradicts prior  
2 statements by Defendant Stephen Lake suggesting that Mr. Sherlock was insolvent and committed  
3 suicide voluntarily.

4 8. The findings materially alter the factual basis of Plaintiffs' claims that Defendants  
5 unlawfully transferred Mr. Sherlock's property interests after his death.

6 9. On January 24 and February 6, 2024, Defendant Eulenthias Duane Alexander met with  
7 Plaintiffs' counsel and a licensed investigator. During those meetings, Alexander admitted that Amy  
8 Sherlock remained an owner of the Ramona Permit and that she was "owed money."

9 10. Alexander also produced documents showing that the law firm Miltner & Menck, through  
10 attorney William L. Miltner, believed that Lake represented Mrs. Sherlock and would obtain her  
11 signatures on conflict-of-interest waivers.

12 11. Subsequent review confirmed that Mrs. Sherlock's signatures on those waivers were  
13 forged, and that the documents were used to justify transactions transferring Mr. Sherlock's business  
14 and property interests without probate approval.

#### 15 **Need for Amendment**

16 12. The proposed SAC removes the antitrust and federal-rights counts that were previously  
17 challenged and focuses the case on the surviving property-based claims for conversion, civil  
18 conspiracy, unfair competition, and declaratory relief.

19 13. The SAC incorporates the new forensic and documentary evidence and aligns the pleadings  
20 with the Court's August 19, 2022 rulings. The amendment does not add new defendants or causes of  
21 action beyond those already litigated but updates the factual record to reflect evidence developed after  
22 2023.

#### 23 **Lack of Prejudice**

24 14. No trial date has been set, and there is no discovery cutoff. All defendants are aware of  
25 the core facts through this and related litigation over the same properties. Granting leave to amend  
26 will not delay the proceedings or prejudice any party; it will simply permit the case to proceed in the  
27 current factual and legal landscape.

1 **Good-Faith Basis**

2 15. The motion is made in good faith, not for delay or tactical advantage, but to ensure that  
3 the pleadings accurately reflect the operative facts and evidence now available. The SAC promotes  
4 judicial economy by narrowing the issues and conforming the complaint to the Court's prior rulings  
5 and to facts developed through investigation and discovery.

6 **Conclusion**

7 16. For all the foregoing reasons, good cause exists under Code of Civil Procedure §§  
8 473(a)(1) and 576 and California Rules of Court, rule 3.1324 to grant leave for Plaintiffs to file their  
9 Second Amended Complaint.

10 I declare under penalty of perjury under the laws of the State of California that the foregoing  
11 is true and correct. Executed on October 23, 2025, at Prosper, Texas.

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14 Matthew Clarke  
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# **EXHIBIT A**

Matthew M. Clarke, State Bar No. 184959  
[matt@kelleyclarke.com](mailto:matt@kelleyclarke.com)  
Kelley Clarke PC  
604 E. Broadway Street  
Prosper, Texas 75078  
Tel. 805-884-9922  
Fax 866-611-9852

Andrew Flores, State Bar No. 272958  
[Afloreslaw@gmail.com](mailto:Afloreslaw@gmail.com)  
Law Office of Andrew Flores  
427 C Street, Suite 220  
San Diego, California 92101  
Tel. 619-356-1556  
Fax 619-274-8053

Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR  
THE COUNTY OF SAN DIEGO – CENTRAL DIVISION**

AMY SHERLOCK, an individual and her  
children T.S. and S.S.,

Plaintiffs,

v.

BRADFORD HARCOURT, an individual;  
EULENTIAS DUANE ALEXANDER, an  
individual; STEPHEN LAKE, an individual,  
NINUS MALAN, an individual; SALAM  
RAZUKI, an individual; OLIVE TREE  
PATIENTS ASSOCIATION, a California  
corporation; ALLIED SPECTRUM, INC., a  
California corporation; PRODIGIOUS  
COLLECTIVES, LLC, a limited liability  
company; and DOES 1 through 50, inclusive,

Defendants

Case No.: 37-2021-00050889-CU-AT-CTL

**Related Case Nos.:**

37-2017-00010073-CU-BC-CTL  
37-2022-0000023-CU-MC-CTL

**SECOND AMENDED COMPLAINT**

**JURY TRIAL DEMANDED**

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1           8. The subject matter jurisdiction is proper as Plaintiffs' claims arise exclusively under the  
2 laws of the State of California, do not arise under federal law, are not preempted by federal law, and  
3 do not challenge conduct within any federal agency's exclusive domain.

4           9. Venue is proper in this county because the acts taken by Defendants occurred within the  
5 County of San Diego, and the subject real properties are located within the County of San Diego.

6           **B. PARTIES**

7           10. Plaintiff AMY SHERLOCK, an individual, at all material times herein was residing and  
8 working in the County of San Diego, California.

9           11. Plaintiff T.S., progeny of Mr. and Mrs. Sherlock, an individual, was, and at all material  
10 times herein, living in the County of San Diego, California.

11           12. Plaintiff S.S., progeny of Mr. and Mrs. Sherlock, an individual, was, and at all material  
12 times herein, living in the County of San Diego, California.

13           13. Defendant STEPHEN LAKE, an individual, was at all material times mentioned herein  
14 residing and working in the County of San Diego, State of California.

15           14. Defendant BRADFORD HARCOURT, an individual, was at all material times  
16 mentioned herein residing and working in the County of San Diego, State of California.

17           15. Defendant EULENTHIAS DUANE ALEXANDER, an individual, was at all material  
18 times mentioned herein residing and working in the County of San Diego, State of California.

19           16. Defendant SALAM RAZUKI, an individual, was at all material times mentioned herein  
20 residing and working in the County of San Diego, State of California.

21           17. Defendant NINUS MALAN, an individual, was at all material times mentioned herein  
22 residing and working in the County of San Diego, State of California.

23           18. Defendant OLIVE TREE PATIENTS ASSOCIATION, a corporation under the laws of  
24 the State of California, doing business as Olive Tree Wellness Center, was at all material times  
25 mentioned herein had its principal place of business and conducted business in the County of San  
26 Diego, State of California.

27           19. Defendant PRODIGIOUS COLLECTIVES, LLC, a limited liability company under the  
28 laws of the State of California, doing business as The Reserve SD, was at all material times

1 mentioned herein had its principal place of business and conducted business in the County of San  
2 Diego, State of California.

3 20. Defendant ALLIED SPECTRUM, INC., a corporation under the laws of the State of  
4 California, was at all material times mentioned herein had its principal place of business and  
5 conducted business in the County of San Diego, State of California.

6 21. The true names and capacities, whether individual, corporate, associate or otherwise, of  
7 Defendants DOES 1 through 50, inclusive, are unknown to Plaintiffs, who therefore sue said  
8 defendants by such fictitious names pursuant to Code of Civil Procedure § 474. Plaintiffs further  
9 allege that each of said fictitious Doe defendants is in some manner responsible for the acts and  
10 occurrences hereinafter set forth. Plaintiffs will amend this Complaint to show their true names and  
11 capacities when the same are ascertained, as well as the manner in which each fictitious defendant is  
12 responsible for the damages sustained by Plaintiffs.

13 22. At all relevant times, each defendant was and is the agent of each of the remaining  
14 defendants and, in doing the acts alleged herein, was acting within the course and scope of such  
15 agency. Each defendant ratified and/or authorized the wrongful acts of each of the defendants.

16 23. Defendants, and each of them, are individually sued as participants and as aiders and  
17 abettors in the unlawful acts, plans, schemes, and transactions alleged in this Complaint. Defendants,  
18 and each of them, have participated as members of the conspiracy alleged herein, acted in  
19 furtherance of it, aided and assisted in carrying out its purposes, performed acts and made statements  
20 in furtherance of the conspiracy, and/or ratified the acts taken in furtherance of the conspiracy.

## 21 **C. MATERIAL FACTS**

### 22 **1. Acquisition of the Sherlock Property and Cannabis Permits**

23 24. In or about 2015, Michael “Biker” Sherlock, a professional athlete and entrepreneur,  
24 acquired sole and ultimate beneficial ownership of two highly lucrative cannabis permits to operate  
25 dispensaries in San Diego County, California. These permits, together with his unit membership in a  
26 limited liability company that owned cannabis-compliant real property, are collectively referred to as  
27 the “Sherlock Property”.  
28

1           25. Mr. Sherlock incorporated United Patients Consumer Cooperative (“UPCC”) on April  
2 22, 2014, and subsequently partnered with defendants Steven Lake and Bradford Harcourt to create  
3 and operate multiple businesses in the cannabis sector, including investments in cannabis-compliant  
4 real estate, cultivation, and sales.

5           26. In January 2015, the Town of Ramona, within the County of San Diego, approved  
6 Mr. Sherlock’s application for a permit to operate a dispensary at 1210 Olive Street, Ramona, CA  
7 92065 (the “Ramona Permit” and the “Ramona Property”). The Ramona Permit was issued to Olive  
8 Tree Patients Association (“Olive Tree”), of which Mr. Sherlock was the sole beneficial owner.

9           27. On June 18, 2015, Leading Edge Real Estate, LLC (“LERE”) became the owner of 8863  
10 Balboa Avenue, Suite E, San Diego, California 92123 (“Balboa Property”). By August 3, 2015,  
11 Mr. Sherlock was the Chief Executive Officer and a Managing Member of LERE.

12           28. On or about July 9, 2015, the City of San Diego approved Mr. Sherlock’s application for  
13 a conditional use permit for a cannabis dispensary to UPCC at the Balboa Property (“Balboa  
14 Permit”).

15           29. The Sherlock Property, at the time of Mr. Sherlock’s death, was valued at least  
16 \$14,000,000, with individual cannabis permits valued at approximately \$7,000,000 and capable of  
17 generating over a million dollars in monthly sales.

## 18                   **2.       Death of Michael Sherlock and Probate Implications**

19           30. On December 3, 2015, Mr. Sherlock passed away intestate, purportedly by suicide.  
20 However, subsequent forensic analysis has cast doubt on the circumstances of his death, as detailed  
21 below.

22           31. Pursuant to California probate law, the Sherlock Property became the property of the  
23 Sherlock Family—his wife, Amy Sherlock, and children, T.S. and S.S.—upon his death. The  
24 transfer of title to the Sherlock Property was required to go through probate court.

25           32. Defendants, including Lake and Harcourt, made false representations to Mrs. Sherlock  
26 regarding the value and ownership of the Sherlock Property, claiming insolvency and lack of value  
27 to discourage the family from pursuing their inheritance.  
28

1                               **3.       Fraudulent Transfers and Forged Documents**

2               33. Plaintiffs allege that, following Mr. Sherlock's death, Defendants conspired to defraud  
3 the Sherlock Family of their ownership interests in the Sherlock Property by forging documents and  
4 making false representations to governmental agencies and the family.

5               34. Lake and Harcourt, without the required approval from a probate court-appointed  
6 executor or the consent of the Sherlock Family, transferred the Balboa Property and associated  
7 permits to themselves and third parties through a series of transactions.

8               35. Public records reveal that, after Mr. Sherlock's death, the Balboa Property had three  
9 different permits issued to three different individuals, which is impossible as only one cannabis  
10 permit can be issued at a single property. The permit was successively issued to Mrs. Sherlock,  
11 Harcourt, and Malan, before ultimately ending up in the name of Malan and being sold to Prodigious  
12 Collectives, LLC pursuant to a court-ordered sale.

13              36. Mrs. Sherlock never applied to have the Balboa Permit transferred to herself, nor did she  
14 provide information or execute documents for the required background check. The application  
15 bearing her signature was forged by Lake or at his direction, and Lake held himself out as her agent  
16 without any power of attorney or agency authority.

17              37. Similarly, the Ramona Permit, originally issued to Mr. Sherlock, was transferred after his  
18 death to Renny Bowden, a longtime friend of Lake, and is currently in the name of defendant  
19 Alexander. Plaintiffs allege that these transfers were facilitated by forged documents and without  
20 lawful authority.

21              38. Defendants used a non-certified copy of Mr. Sherlock's death certificate to facilitate the  
22 transfer of the Sherlock Property. Plaintiffs never provided a certified copy, and only certain  
23 individuals are authorized to obtain such documents. The use of a non-certified copy was another  
24 effort to conceal the unlawful transfer from the Sherlock Family.

25                               **4.       Sequence of Ownership and Transfers Post-Mortem**

26              39. After Mr. Sherlock's death, Harcourt sold the Balboa Property, on behalf of LERE, to  
27 High Sierra Equity, LLC (a Lake wholly owned entity), which then sold it to Razuki Investments,  
28

1 LLC, and subsequently to San Diego United Holdings Group, LLC (a Malan wholly owned entity).  
2 Ultimately, the Balboa Property was sold pursuant to court order to Allied Spectrum Inc.

3 40. At no point did Harcourt explain how he could lawfully transfer the Balboa Property on  
4 behalf of LERE without going through probate court or obtaining the consent of the Sherlock Family  
5 as heirs.

6 41. The Balboa Permit was transferred through a series of questionable transactions,  
7 including judicial admissions by Harcourt that he submitted documentation to the City of San Diego  
8 to remove Sherlock as the responsible person and to record the CUP under a different entity. The  
9 permit was ultimately transferred to Malan and sold to Prodigious Collectives, LLC.

10 42. The Ramona Permit, after Mr. Sherlock's death, was transferred to Bowden and then to  
11 Alexander, with Alexander admitting that Mrs. Sherlock is an owner and "owed money".

## 12 **5. Value and Nature of the Property at Issue**

13 43. Cannabis permits in San Diego County are personal property, valued at approximately  
14 \$7,000,000 each, and can generate substantial monthly revenue. The Balboa Dispensary, for  
15 example, was represented to generate up to \$100,000 on weekends.

16 44. The motive behind Defendants' actions is alleged to be the extraordinary profits  
17 generated by the dispensaries and the desire for financial gain.

## 18 **6. The "Strawman Practice" and Related Litigation**

19 45. Plaintiffs allege that attorney Gina Austin, originally a defendant, aided and abetted  
20 clients in acquiring cannabis permits in the name of agents or partners ("strawmen"), who falsely  
21 stated sole ownership without disclosing agency or principal ownership. This practice allowed  
22 individuals previously sanctioned for illegal dispensary operations to circumvent licensing  
23 restrictions.

24 46. The courts have held that the "Strawman Practice" is not criminally illegal as a matter of  
25 law, but Plaintiffs dispute this position and reserve the right to amend the complaint should the  
26 ruling be reversed or vacated.

1           47. Litigation over the Balboa Permit and Property has included allegations of fraud,  
2 misrepresentation, and even criminal conduct, such as Razuki's attempt to hire an assassin to kill  
3 Malan during a dispute over ownership and profits.

#### 4                       **7.       Forensic Evidence and Admissions**

5           48. On December 28, 2023, the Sherlock Family received a forensic report from Scott Roder,  
6 owner of Evidence-Room Forensic Reconstruction, analyzing the coroner's report and police  
7 investigation into Mr. Sherlock's death. The report concluded that Mr. Sherlock's death was "100%  
8 inconsistent with a self-inflicted gunshot wound and suicide," directly contradicting the official  
9 cause of death.

10          49. The narrative that Mr. Sherlock was depressed and insolvent was fabricated by Lake to  
11 deceive the Sherlock Family and conceal the true value of the Sherlock Property, which was  
12 subsequently transferred to Lake and Harcourt.

13          50. Defendant Alexander admitted to Plaintiffs' attorney that Mrs. Sherlock is an owner of  
14 the Ramona Permit and "owed money." Alexander provided documents showing that Lake,  
15 Alexander, and allegedly Mrs. Sherlock had retained the law firm of Miltner & Menck, but  
16 Mrs. Sherlock never retained the firm, and her signature on conflict waivers and other documents  
17 was forged by Lake.

18          51. Lake has never had a power of attorney or any type of agency for Mrs. Sherlock, and the  
19 documentation provided to governmental agencies and third parties was fraudulent.

#### 20                       **8.       Summary of Defendants' Conduct**

21          52. Plaintiffs allege that all Defendants knew or should have known that the Sherlock  
22 Property was the property of Mr. Sherlock and, upon his death, of the Sherlock Family. Any transfer  
23 of ownership required authorization from a probate court or the heirs themselves.

24          53. Defendants conspired to effectuate the transfer of the Sherlock Property through forged  
25 documents, false representations, and unlawful transactions, depriving the Sherlock Family of their  
26 rightful inheritance and causing substantial emotional and financial harm.

1           54. Plaintiffs dispute all claims of past and current ownership by Defendants and other  
2 parties with claims to the Sherlock Property and seek a declaration that all transfers of  
3 Mr. Sherlock's interests in the Sherlock Property are void.

4           **D.       LEGAL THEORIES AND CAUSES OF ACTION**

5                   **First Cause of Action for Conversion Against All Defendants**

6           55. Plaintiffs reallege and incorporate herein by reference the allegations in the preceding  
7 paragraphs as though fully set forth herein.

8           56. Upon the death of Michael Sherlock, Plaintiffs, as his heirs, acquired ownership interests  
9 in the Sherlock Property, which includes two highly valuable cannabis permits and associated real  
10 property.

11          57. Defendants, including Lake and Harcourt, converted the Sherlock Property to themselves  
12 and third parties by means of forged documents, including signatures of Mr. and Mrs. Sherlock, and  
13 without lawful authority or probate proceedings.

14          58. All Defendants knew or should have known that Mr. Sherlock owned the Sherlock  
15 Property at the time of his death, and that any transfer of such property required probate court  
16 approval or the consent of the Sherlock Family as heirs.

17          59. Defendants Prodigious Collectives, LLC and Allied Spectrum, Inc., in which Malan  
18 holds an ownership interest, currently own respectively, the Balboa Permit and the Balboa Property.  
19 Defendant Alexander is the current owner of the Ramona Permit.

20          60. The Sherlock Property was required by law to go through probate, and all sales or  
21 transfers of the Sherlock Property after Mr. Sherlock's death are void ab initio.

22          61. Plaintiffs are entitled to the return of the Sherlock Property and damages for its  
23 conversion.

24                   **Second Cause of Action Civil Conspiracy Against all Defendants**

25          62. Plaintiffs reallege and incorporate herein by reference the allegations in the preceding  
26 paragraphs as though fully set forth herein.

1           63. Defendants Lake and Harcourt, acting in concert and with the aid of other Defendants,  
2 used forged documents and false representations to defraud the Sherlock Family of their ownership  
3 interests in the Sherlock Property after Mr. Sherlock's death.

4           64. Lake made false statements to Mrs. Sherlock regarding the value and ownership of the  
5 Sherlock Property, intending to prevent her from seeking her inheritance and to facilitate the  
6 unlawful transfer of assets.

7           65. Mrs. Sherlock relied on Lake's representations due to his familial relationship and  
8 business partnership with Mr. Sherlock. She also trusted Harcourt to honor his fiduciary duties as  
9 Managing Member of LERE.

10           66. Harcourt breached his fiduciary duties to the estate of Mr. Sherlock and the Sherlock  
11 Family by participating in the unlawful transfer of the Balboa Property and associated permits.

12           67. All Defendants knew, or should have known, that the Sherlock Property belonged to  
13 Mr. Sherlock and, upon his death, to the Sherlock Family, and that any transfer required probate  
14 authorization.

15           68. Harcourt's repeated refusal to explain how he lawfully transferred the Balboa Property on  
16 behalf of LERE, without the consent of the Sherlock Family or probate authority, evidences his  
17 knowing participation in the conspiracy.

18           69. All Defendants benefited from the sale and transfer of the Sherlock Property and  
19 conspired to accept and further transfer the property when they knew or should have known that  
20 such transfers were unlawful.

21           70. Plaintiffs have suffered substantial damages because of Defendants' conspiracy.

22                   **Third Cause of Action for Declaratory Relief Against All Defendants**

23  
24           71. Plaintiffs reallege and incorporate herein by reference the allegations in the preceding  
25 paragraphs as though fully set forth herein.

26           72. Upon the death of Mr. Sherlock, probate proceedings were required to settle his estate  
27 and transfer his property to his heirs.

73. No probate proceedings took place, and Defendants have provided no lawful explanation for how they could transfer Mr. Sherlock's ownership interests in the Sherlock Property after his death.

74. The transfers of the Sherlock Property were effectuated via forged documents, which all Defendants knew or should have known were void.

75. Plaintiffs dispute all claims of past and current ownership by Defendants and all other parties with claims to the Sherlock Property.

76. Plaintiffs were unlawfully deprived of their interests in the Sherlock Property, and the Balboa Property and Balboa Permit were sold pursuant to a court order based on the false assumption that Lake and Harcourt had original lawful ownership.

77. Lake and Harcourt did not lawfully acquire Mr. Sherlock's ownership interests in LERE and the Balboa Permit, and Razuki and Malan knew or should have known that Lake and Harcourt did not have lawful ownership and could not lawfully transfer or sell the Sherlock Property.

78. Plaintiffs seek a declaration that all transfers of Mr. Sherlock's interest in the Sherlock Property are void and that the Sherlock Family is the rightful owner of the property.

#### **Fourth Cause of Action for Unfair Competition and Unlawful Business Practices**

### Against all Defendants

79. Plaintiffs reallege and incorporate herein by reference the allegations in the preceding paragraphs as though fully set forth herein.

80. Defendants filed documents with public offices effectuating the transfer of the Sherlock Property after Mr. Sherlock's death based on forged documents, in violation of California Penal Code § 115.

81. The filing of such documents also violated the City of San Diego Municipal Code and California's cannabis licensing laws, which require truthful disclosure of ownership and compliance with all local and state requirements.

1 82. Defendants' conduct constitutes unfair competition and unlawful business practices under  
2 California law, entitling Plaintiffs to restitution, injunctive relief, and other remedies as provided by  
3 statute.

4 **E. PRAYER FOR RELIEF**

5 WHEREFORE, Plaintiffs respectfully request that the Court grant the following relief:

6 a) Pursuant to Government Code § 12261, an order reinstating Leading Edge Real  
7 Estate, LLC ("LERE").

8 b) Compensatory, general, consequential, and incidental damages, together with  
9 prejudgment interest, in an amount to be proven at trial, as permitted by law.

10 c) An award of statutory damages, as permitted by law.

11 d) An award of punitive and exemplary damages, as permitted by law.

12 e) Reasonable attorney fees and costs, as permitted by law.

13 f) A temporary restraining order, preliminary injunction, and permanent injunction  
14 enjoining the transfer of the Sherlock Property.

15 g) Declaratory relief that all transfers of Mr. Sherlock's interests in the Sherlock  
16 Property after his death are void and that the Sherlock Family is the rightful owner of the property.

17 h) Any such other and further relief as the Court deems fair, equitable, and just.

18  
19 DATED: October 9, 2025

KELLEY | CLARKE, PC

20  
21 By: \_\_\_\_\_

22 Matthew M. Clarke  
23 Attorneys for AMY SHERLOCK, an individual, and  
24 her children T.S. and S.S.  
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**VERIFICATION**

I, Amy Sherlock, am the attorney for Plaintiffs in this action. I have read the foregoing Second Amended Complaint and know the contents thereof. The same is true of my own knowledge, except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

\_\_\_\_\_  
Amy Sherlock

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I am employed in the County of Collin, State of Texas. I am over the age of 18 years and not a party to this action. My business address is 603 E. Broadway Street, Prosper, Texas 75078. On September \_\_\_, 2025, I served the foregoing document described as \_\_\_\_\_ on the interested parties in this action:

☐ **BY U.S. POSTAL SERVICE:** This document was served by United States mail. I enclosed the document in a sealed envelope or package addressed to the person(s) at the address(es) above and placed the envelope(s) for collection and mailing, following our ordinary business practices. I am readily familiar with this firm's practice of collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service at Highland Village, Texas, in a sealed envelope with postage fully paid.

**BY OVERNIGHT DELIVERY:** The document(s) were served by overnight delivery via FedEx. I enclosed the document in a sealed envelope or package addressed to the person(s) and the address(es) above and placed the envelope(s) for pick-up by FedEx. I am readily familiar with the firm's practice of collection and processing correspondence on the same day with this courier service, for overnight delivery.

☐ **BY HAND DELIVERY:** The document(s) were delivered by hand during the normal course of business, during regular business hours.

☐ (Federal) I declare that I am employed in the office of a member of the Bar of this Court, at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

---

Matthew Clarke

# **EXHIBIT B**

Matthew M. Clarke, State Bar No. 184959  
[matt@kelleyclarke.com](mailto:matt@kelleyclarke.com)  
Kelley Clarke PC  
604 E. Broadway Street  
Prosper, Texas 75078  
Tel. 805-884-9922  
Fax 866-611-9852

Andrew Flores, State Bar No. 272958  
[Afloreslaw@gmail.com](mailto:Afloreslaw@gmail.com)  
Law Office of Andrew Flores  
427 C Street, Suite 220  
San Diego, California 92101  
Tel. 619-356-1556  
Fax 619-274-8053

Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR  
THE COUNTY OF SAN DIEGO – CENTRAL DIVISION**

AMY SHERLOCK, an individual and her  
children T.S. and S.S.,

Plaintiffs,

v.

BRADFORD HARCOURT, an individual;  
EULENTIAS DUANE ALEXANDER, an  
individual; STEPHEN LAKE, an individual,  
NINUS MALAN, an individual; SALAM  
RAZUKI, an individual; OLIVE TREE  
PATIENTS ASSOCIATION, a California  
corporation; ALLIED SPECTRUM, INC., a  
California corporation; PRODIGIOUS  
COLLECTIVES, LLC, a limited liability  
company; and DOES 1 through 50, inclusive,

Defendants

Case No.: 37-2021-00050889-CU-AT-CTL

**Related Case Nos.:**

37-2017-00010073-CU-BC-CTL  
37-2022-0000023-CU-MC-CTL

**SECOND AMENDED COMPLAINT**

**JURY TRIAL DEMANDED**

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1           8. The subject matter jurisdiction is proper as Plaintiffs' claims arise exclusively under the  
2 laws of the State of California, do not arise under federal law, are not preempted by federal law, and  
3 do not challenge conduct within any federal agency's exclusive domain.

4           9. Venue is proper in this county because the acts taken by Defendants occurred within the  
5 County of San Diego, and the subject real properties are located within the County of San Diego.

6           **B. PARTIES**

7           10. Plaintiff AMY SHERLOCK, an individual, at all material times herein was residing and  
8 working in the County of San Diego, California.

9           11. Plaintiff T.S., progeny of Mr. and Mrs. Sherlock, an individual, was, and at all material  
10 times herein, living in the County of San Diego, California.

11           12. Plaintiff S.S., progeny of Mr. and Mrs. Sherlock, an individual, was, and at all material  
12 times herein, living in the County of San Diego, California.

13           13. Defendant STEPHEN LAKE, an individual, was at all material times mentioned herein  
14 residing and working in the County of San Diego, State of California.

15           14. Defendant BRADFORD HARCOURT, an individual, was at all material times  
16 mentioned herein residing and working in the County of San Diego, State of California.

17           15. Defendant EULENTHIAS DUANE ALEXANDER, an individual, was at all material  
18 times mentioned herein residing and working in the County of San Diego, State of California.

19           16. Defendant SALAM RAZUKI, an individual, was at all material times mentioned herein  
20 residing and working in the County of San Diego, State of California.

21           17. Defendant NINUS MALAN, an individual, was at all material times mentioned herein  
22 residing and working in the County of San Diego, State of California.

23           18. Defendant OLIVE TREE PATIENTS ASSOCIATION, a corporation under the laws of  
24 the State of California, doing business as Olive Tree Wellness Center, was at all material times  
25 mentioned herein had its principal place of business and conducted business in the County of San  
26 Diego, State of California.

27           19. Defendant PRODIGIOUS COLLECTIVES, LLC, a limited liability company under the  
28 laws of the State of California, doing business as The Reserve SD, was at all material times

1 mentioned herein had its principal place of business and conducted business in the County of San  
2 Diego, State of California.

3 20. Defendant ALLIED SPECTRUM, INC., a corporation under the laws of the State of  
4 California, was at all material times mentioned herein had its principal place of business and  
5 conducted business in the County of San Diego, State of California.

6 21. The true names and capacities, whether individual, corporate, associate or otherwise, of  
7 Defendants DOES 1 through 50, inclusive, are unknown to Plaintiffs, who therefore sue said  
8 defendants by such fictitious names pursuant to Code of Civil Procedure § 474. Plaintiffs further  
9 allege that each of said fictitious Doe defendants is in some manner responsible for the acts and  
10 occurrences hereinafter set forth. Plaintiffs will amend this Complaint to show their true names and  
11 capacities when the same are ascertained, as well as the manner in which each fictitious defendant is  
12 responsible for the damages sustained by Plaintiffs.

13 22. At all relevant times, each defendant was and is the agent of each of the remaining  
14 defendants and, in doing the acts alleged herein, was acting within the course and scope of such  
15 agency. Each defendant ratified and/or authorized the wrongful acts of each of the defendants.

16 23. Defendants, and each of them, are individually sued as participants and as aiders and  
17 abettors in the unlawful acts, plans, schemes, and transactions alleged in this Complaint. Defendants,  
18 and each of them, have participated as members of the conspiracy alleged herein, acted in  
19 furtherance of it, aided and assisted in carrying out its purposes, performed acts and made statements  
20 in furtherance of the conspiracy, and/or ratified the acts taken in furtherance of the conspiracy.

## 21 **C. MATERIAL FACTS**

### 22 **1. Acquisition of the Sherlock Property and Cannabis Permits**

23 24. In or about 2015, Michael “Biker” Sherlock, a professional athlete and entrepreneur,  
24 acquired sole and ultimate beneficial ownership of two highly lucrative cannabis permits to operate  
25 dispensaries in San Diego County, California. These permits, together with his unit membership in a  
26 limited liability company that owned cannabis-compliant real property, are collectively referred to as  
27 the “Sherlock Property”.  
28

1           25. Mr. Sherlock incorporated United Patients Consumer Cooperative (“UPCC”) on April  
2 22, 2014, and subsequently partnered with defendants Steven Lake and Bradford Harcourt to create  
3 and operate multiple businesses in the cannabis sector, including investments in cannabis-compliant  
4 real estate, cultivation, and sales.

5           26. In January 2015, the Town of Ramona, within the County of San Diego, approved  
6 Mr. Sherlock’s application for a permit to operate a dispensary at 1210 Olive Street, Ramona, CA  
7 92065 (the “Ramona Permit” and the “Ramona Property”). The Ramona Permit was issued to Olive  
8 Tree Patients Association (“Olive Tree”), of which Mr. Sherlock was the sole beneficial owner.

9           27. On June 18, 2015, Leading Edge Real Estate, LLC (“LERE”) became the owner of 8863  
10 Balboa Avenue, Suite E, San Diego, California 92123 (“Balboa Property”). By August 3, 2015,  
11 Mr. Sherlock was the Chief Executive Officer and a Managing Member of LERE.

12           28. On or about July 9, 2015, the City of San Diego approved Mr. Sherlock’s application for  
13 a conditional use permit for a cannabis dispensary to UPCC at the Balboa Property (“Balboa  
14 Permit”).

15           29. The Sherlock Property, at the time of Mr. Sherlock’s death, was valued at least  
16 \$14,000,000, with individual cannabis permits valued at approximately \$7,000,000 and capable of  
17 generating over a million dollars in monthly sales.

## 18                   **2.       Death of Michael Sherlock and Probate Implications**

19           30. On December 3, 2015, Mr. Sherlock passed away intestate, purportedly by suicide.  
20 However, subsequent forensic analysis has cast doubt on the circumstances of his death, as detailed  
21 below.

22           31. Pursuant to California probate law, the Sherlock Property became the property of the  
23 Sherlock Family—his wife, Amy Sherlock, and children, T.S. and S.S.—upon his death. The  
24 transfer of title to the Sherlock Property was required to go through probate court.

25           32. Defendants, including Lake and Harcourt, made false representations to Mrs. Sherlock  
26 regarding the value and ownership of the Sherlock Property, claiming insolvency and lack of value  
27 to discourage the family from pursuing their inheritance.  
28

1                               **3.       Fraudulent Transfers and Forged Documents**

2               33. Plaintiffs allege that, following Mr. Sherlock's death, Defendants conspired to defraud  
3 the Sherlock Family of their ownership interests in the Sherlock Property by forging documents and  
4 making false representations to governmental agencies and the family.

5               34. Lake and Harcourt, without the required approval from a probate court-appointed  
6 executor or the consent of the Sherlock Family, transferred the Balboa Property and associated  
7 permits to themselves and third parties through a series of transactions.

8               35. Public records reveal that, after Mr. Sherlock's death, the Balboa Property had three  
9 different permits issued to three different individuals, which is impossible as only one cannabis  
10 permit can be issued at a single property. The permit was successively issued to Mrs. Sherlock,  
11 Harcourt, and Malan, before ultimately ending up in the name of Malan and being sold to Prodigious  
12 Collectives, LLC pursuant to a court-ordered sale.

13              36. Mrs. Sherlock never applied to have the Balboa Permit transferred to herself, nor did she  
14 provide information or execute documents for the required background check. The application  
15 bearing her signature was forged by Lake or at his direction, and Lake held himself out as her agent  
16 without any power of attorney or agency authority.

17              37. Similarly, the Ramona Permit, originally issued to Mr. Sherlock, was transferred after his  
18 death to Renny Bowden, a longtime friend of Lake, and is currently in the name of defendant  
19 Alexander. Plaintiffs allege that these transfers were facilitated by forged documents and without  
20 lawful authority.

21              38. Defendants used a non-certified copy of Mr. Sherlock's death certificate to facilitate the  
22 transfer of the Sherlock Property. Plaintiffs never provided a certified copy, and only certain  
23 individuals are authorized to obtain such documents. The use of a non-certified copy was another  
24 effort to conceal the unlawful transfer from the Sherlock Family.

25                               **4.       Sequence of Ownership and Transfers Post-Mortem**

26              39. After Mr. Sherlock's death, Harcourt sold the Balboa Property, on behalf of LERE, to  
27 High Sierra Equity, LLC (a Lake wholly owned entity), which then sold it to Razuki Investments,  
28

1 LLC, and subsequently to San Diego United Holdings Group, LLC (a Malan wholly owned entity).  
2 Ultimately, the Balboa Property was sold pursuant to court order to Allied Spectrum Inc.

3 40. At no point did Harcourt explain how he could lawfully transfer the Balboa Property on  
4 behalf of LERE without going through probate court or obtaining the consent of the Sherlock Family  
5 as heirs.

6 41. The Balboa Permit was transferred through a series of questionable transactions,  
7 including judicial admissions by Harcourt that he submitted documentation to the City of San Diego  
8 to remove Sherlock as the responsible person and to record the CUP under a different entity. The  
9 permit was ultimately transferred to Malan and sold to Prodigious Collectives, LLC.

10 42. The Ramona Permit, after Mr. Sherlock's death, was transferred to Bowden and then to  
11 Alexander, with Alexander admitting that Mrs. Sherlock is an owner and "owed money".

## 12 **5. Value and Nature of the Property at Issue**

13 43. Cannabis permits in San Diego County are personal property, valued at approximately  
14 \$7,000,000 each, and can generate substantial monthly revenue. The Balboa Dispensary, for  
15 example, was represented to generate up to \$100,000 on weekends.

16 44. The motive behind Defendants' actions is alleged to be the extraordinary profits  
17 generated by the dispensaries and the desire for financial gain.

## 18 **6. The "Strawman Practice" and Related Litigation**

19 45. Plaintiffs allege that attorney Gina Austin, originally a defendant, aided and abetted  
20 clients in acquiring cannabis permits in the name of agents or partners ("strawmen"), who falsely  
21 stated sole ownership without disclosing agency or principal ownership. This practice allowed  
22 individuals previously sanctioned for illegal dispensary operations to circumvent licensing  
23 restrictions.

24 46. The courts have held that the "Strawman Practice" is not criminally illegal as a matter of  
25 law, but Plaintiffs dispute this position and reserve the right to amend the complaint should the  
26 ruling be reversed or vacated.

1           47. Litigation over the Balboa Permit and Property has included allegations of fraud,  
2 misrepresentation, and even criminal conduct, such as Razuki's attempt to hire an assassin to kill  
3 Malan during a dispute over ownership and profits.

#### 4                       **7.       Forensic Evidence and Admissions**

5           48. On December 28, 2023, the Sherlock Family received a forensic report from Scott Roder,  
6 owner of Evidence-Room Forensic Reconstruction, analyzing the coroner's report and police  
7 investigation into Mr. Sherlock's death. The report concluded that Mr. Sherlock's death was "100%  
8 inconsistent with a self-inflicted gunshot wound and suicide," directly contradicting the official  
9 cause of death.

10          49. The narrative that Mr. Sherlock was depressed and insolvent was fabricated by Lake to  
11 deceive the Sherlock Family and conceal the true value of the Sherlock Property, which was  
12 subsequently transferred to Lake and Harcourt.

13          50. Defendant Alexander admitted to Plaintiffs' attorney that Mrs. Sherlock is an owner of  
14 the Ramona Permit and "owed money." Alexander provided documents showing that Lake,  
15 Alexander, and allegedly Mrs. Sherlock had retained the law firm of Miltner & Menck, but  
16 Mrs. Sherlock never retained the firm, and her signature on conflict waivers and other documents  
17 was forged by Lake.

18          51. Lake has never had a power of attorney or any type of agency for Mrs. Sherlock, and the  
19 documentation provided to governmental agencies and third parties was fraudulent.

#### 20                       **8.       Summary of Defendants' Conduct**

21          52. Plaintiffs allege that all Defendants knew or should have known that the Sherlock  
22 Property was the property of Mr. Sherlock and, upon his death, of the Sherlock Family. Any transfer  
23 of ownership required authorization from a probate court or the heirs themselves.

24          53. Defendants conspired to effectuate the transfer of the Sherlock Property through forged  
25 documents, false representations, and unlawful transactions, depriving the Sherlock Family of their  
26 rightful inheritance and causing substantial emotional and financial harm.

1           54. Plaintiffs dispute all claims of past and current ownership by Defendants and other  
2 parties with claims to the Sherlock Property and seek a declaration that all transfers of  
3 Mr. Sherlock's interests in the Sherlock Property are void.

4           **D.       LEGAL THEORIES AND CAUSES OF ACTION**

5                   **First Cause of Action for Conversion Against All Defendants**

6           55. Plaintiffs reallege and incorporate herein by reference the allegations in the preceding  
7 paragraphs as though fully set forth herein.

8           56. Upon the death of Michael Sherlock, Plaintiffs, as his heirs, acquired ownership interests  
9 in the Sherlock Property, which includes two highly valuable cannabis permits and associated real  
10 property.

11          57. Defendants, including Lake and Harcourt, converted the Sherlock Property to themselves  
12 and third parties by means of forged documents, including signatures of Mr. and Mrs. Sherlock, and  
13 without lawful authority or probate proceedings.

14          58. All Defendants knew or should have known that Mr. Sherlock owned the Sherlock  
15 Property at the time of his death, and that any transfer of such property required probate court  
16 approval or the consent of the Sherlock Family as heirs.

17          59. Defendants Prodigious Collectives, LLC and Allied Spectrum, Inc., in which Malan  
18 holds an ownership interest, currently own respectively, the Balboa Permit and the Balboa Property.  
19 Defendant Alexander is the current owner of the Ramona Permit.

20          60. The Sherlock Property was required by law to go through probate, and all sales or  
21 transfers of the Sherlock Property after Mr. Sherlock's death are void ab initio.

22          61. Plaintiffs are entitled to the return of the Sherlock Property and damages for its  
23 conversion.

24                   **Second Cause of Action Civil Conspiracy Against all Defendants**

25          62. Plaintiffs reallege and incorporate herein by reference the allegations in the preceding  
26 paragraphs as though fully set forth herein.

1           63. Defendants Lake and Harcourt, acting in concert and with the aid of other Defendants,  
2 used forged documents and false representations to defraud the Sherlock Family of their ownership  
3 interests in the Sherlock Property after Mr. Sherlock's death.

4           64. Lake made false statements to Mrs. Sherlock regarding the value and ownership of the  
5 Sherlock Property, intending to prevent her from seeking her inheritance and to facilitate the  
6 unlawful transfer of assets.

7           65. Mrs. Sherlock relied on Lake's representations due to his familial relationship and  
8 business partnership with Mr. Sherlock. She also trusted Harcourt to honor his fiduciary duties as  
9 Managing Member of LERE.

10           66. Harcourt breached his fiduciary duties to the estate of Mr. Sherlock and the Sherlock  
11 Family by participating in the unlawful transfer of the Balboa Property and associated permits.

12           67. All Defendants knew, or should have known, that the Sherlock Property belonged to  
13 Mr. Sherlock and, upon his death, to the Sherlock Family, and that any transfer required probate  
14 authorization.

15           68. Harcourt's repeated refusal to explain how he lawfully transferred the Balboa Property on  
16 behalf of LERE, without the consent of the Sherlock Family or probate authority, evidences his  
17 knowing participation in the conspiracy.

18           69. All Defendants benefited from the sale and transfer of the Sherlock Property and  
19 conspired to accept and further transfer the property when they knew or should have known that  
20 such transfers were unlawful.

21           70. Plaintiffs have suffered substantial damages because of Defendants' conspiracy.

22                   **Third Cause of Action for Declaratory Relief Against All Defendants**  
23

24           71. Plaintiffs reallege and incorporate herein by reference the allegations in the preceding  
25 paragraphs as though fully set forth herein.

26           72. Upon the death of Mr. Sherlock, probate proceedings were required to settle his estate  
27 and transfer his property to his heirs.  
28

1           73. No probate proceedings took place, and Defendants have provided no lawful explanation  
2 for how they could transfer Mr. Sherlock's ownership interests in the Sherlock Property after his  
3 death.

4           74. The transfers of the Sherlock Property were effectuated via forged documents, which all  
5 Defendants knew or should have known were void.

6           75. Plaintiffs dispute all claims of past and current ownership by Defendants and all other  
7 parties with claims to the Sherlock Property.

8           76. Plaintiffs were unlawfully deprived of their interests in the Sherlock Property, and the  
9 Balboa Property and Balboa Permit were sold pursuant to a court order based on the false  
10 assumption that Lake and Harcourt had original lawful ownership.

11           77. Lake and Harcourt did not lawfully acquire Mr. Sherlock's ownership interests in LERE  
12 and the Balboa Permit, and Razuki and Malan knew or should have known that Lake and Harcourt  
13 did not have lawful ownership and could not lawfully transfer or sell the Sherlock Property.

14           78. Plaintiffs seek a declaration that all transfers of Mr. Sherlock's interest in the Sherlock  
15 Property are void and that the Sherlock Family is the rightful owner of the property.

16           **Fourth Cause of Action for Unfair Competition and Unlawful Business Practices**

17                   **Against all Defendants**

18           79. Plaintiffs reallege and incorporate herein by reference the allegations in the preceding  
19 paragraphs as though fully set forth herein.

20           80. Defendants filed documents with public offices effectuating the transfer of the Sherlock  
21 Property after Mr. Sherlock's death based on forged documents, in violation of California Penal  
22 Code § 115.

23           81. The filing of such documents also violated the City of San Diego Municipal Code and  
24 California's cannabis licensing laws, which require truthful disclosure of ownership and compliance  
25 with all local and state requirements.  
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1 82. Defendants' conduct constitutes unfair competition and unlawful business practices  
2 under California law, entitling Plaintiffs to restitution, injunctive relief, and other remedies as  
3 provided by statute.

4 **E. PRAYER FOR RELIEF**

5 WHEREFORE, Plaintiffs respectfully request that the Court grant the following relief:

6 a) Pursuant to Government Code § 12261, an order reinstating Leading Edge Real  
7 Estate, LLC ("LERE").

8 b) Compensatory, general, consequential, and incidental damages, together with  
9 prejudgment interest, in an amount to be proven at trial, as permitted by law.

10 c) An award of statutory damages, as permitted by law.

11 d) An award of punitive and exemplary damages, as permitted by law.

12 e) Reasonable attorney fees and costs, as permitted by law.

13 f) A temporary restraining order, preliminary injunction, and permanent injunction  
14 enjoining the transfer of the Sherlock Property.

15 g) Declaratory relief that all transfers of Mr. Sherlock's interests in the Sherlock  
16 Property after his death are void and that the Sherlock Family is the rightful owner of the property.

17 h) Any such other and further relief as the Court deems fair, equitable, and just.

18  
19 DATED: October 10, 2025

KELLEY | CLARKE, PC

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21 By: Matthew M. Clarke  
Matthew M. Clarke

22 Attorneys for AMY SHERLOCK, an individual, and  
23 her children T.S. and S.S.

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**VERIFICATION**

I, Amy Sherlock, am the attorney for Plaintiffs in this action. I have read the foregoing Second Amended Complaint and know the contents thereof. The same is true of my own knowledge, except as to those matters which are stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

\_\_\_\_\_  
Amy Sherlock

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I am employed in the County of Collin, State of Texas. I am over the age of 18 years and not a party to this action. My business address is 603 E. Broadway Street, Prosper, Texas 75078. On October 23, 2025, I served the foregoing document described as **NOTICE OF MOTION AND MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF MATTHEW CLARKE; [PROPOSED] ORDER** on the interested parties in this action:

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Matthew Clarke  
Matthew Clarke

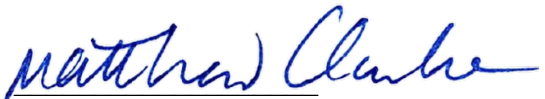
1 **SERVICE LIST**

2 For service by email, I did not receive, within a reasonable time after the transmission, any  
3 electronic message or other indication that the transmission was unsuccessful.

4 I declare under penalty of perjury under the laws of the State of California that the foregoing  
5 is true and correct. Executed on October 23, 2025, at Prosper, Texas.

6  
7 Andrew Hall  
andrew@blakelawca.com  
8 Steven Blake  
steven@blakelawca.com  
9 **Attorneys for Steven Lake**

David Demergian  
david@demergianlaw.com  
**Attorney for Salam Rasuki,**  
**Allied Spectrum Inc., and**  
**Prodigious Collective, LLC**

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