

## Amy Sherlock's Response to the June 7, 2022, [Blake Law Letter \(BLL\)](#)

June 17, 2022

1. In general, the point that the BLL doesn't respond to anywhere, but is in my state complaint, [SHERLOCK et al v LAKE et al](#) is that their client, Stephen Lake (LAKE) *lied to the police*. **In the police report** LAKE states that Biker was concerned about "*small things*." ([See Pg 2, Para 2](#)) I don't think anyone would agree that, according to LAKE'S in the BLL, that Biker signing away his company and giving up everything he'd worked on for two years constituted "small things" as had been stated in the police report.

The LAKE statements in the BLL completely mischaracterize the dissolution paper and the historical reenactment of these CUP transfer documents by Biker (and now Biker's partner Bradford Harcourt) "intent." ([See Page 3, Para 4](#)) In reality, it wasn't until my 03/05/20 meeting with LAKE where he first told me he had witnessed Biker signing the CUP transfer documents on the day he died. This is simply not true! Had LAKE mentioned the signing of these documents to the police, or to me, I would have been suspicious and investigated the "deal" because anyone who signed papers then commits suicide or was murdered, is obviously going to raise some questions. I knew when I met LAKE on 03/05/20 that the CUP transfer documents were not Biker's signature. It had been forged. LAKE took this meeting in an attempt to pacify me. In reality Harcourt already knew, as a result of the following emails, that the forensic analysis proved Biker's signature was forged. It was in my attorney Andrew [Flores emails to Harcourt counsel Claybon](#) which first makes Harcourt aware that I was not accepting the narrative they were putting forth and of course he went on and shared that information with LAKE.

Had LAKE told me the truth as to whatever they were up to back then, I would have absolutely investigated Biker's death in much greater detail as to this supposed "document signing" and everything else they were up to. ***It DID NOT HAPPEN!*** LAKE'S lies kept me from knowing the truth and a follow up murder investigation. Most importantly, Biker's children, his parents, sisters, family and friends were denied the truth by LAKE! Subsequently, and at least up until now, Biker's fans may never know the truth and with this much time having elapsed, it makes it that much harder for us to clear Biker's name surrounding the actual events that took place prior to his death.

2. [See Page 2, Para 2](#) "Unlikely coincidence." I find this suspicious. LAKE states that Biker and Renny Bowden (LAKE'S college roommate and another straw person) were already working together when LAKE was approached to buy the Ramona property? This astronomically unlikely these two would have met without LAKE's introduction. I believe LAKE brought Bowden in so the two of them could out vote Biker. As can be seen by the [2017 County of San Diego Sherriff's Department Medical Marijuana Collective Operations Certificate](#) for the Ramona Collective it's also now clear that Bradford Harcourt who is also listed on the operations certificate has an interest in the second Biker CUP. I'm truly suspicious as to why LAKE doesn't say how Bowden and Harcourt came to be part of the Ramona Collective. His description of the events leading up to his involvement in the RE is highly suspect.

3. [See Page 2, Para 3](#) "Biker never had an interest in the Ramona property nor, to the best of LAKE'S knowledge, did Biker ever have an interest in the Ramona CUP." This is completely false. The Ramona CUP was in Biker's name when he died and the [2015 Ramona CUP application](#), which bears Biker's contact information as well as what appears to be his signature also bears LAKES name, is proof of it! I would be interested to see who actually paid the \$11,115.00 check as shown having been paid?

On page 3 it just above Biker's signature Applicant Signature appears to be Renny Bowden who would have known he was the actual applicant in January 13, 2015 when this document was signed.

In and around 2017, on two different occasions I visited the Ramona site with LAKE, introduced me to Duane and the dispensary manager whose name I don't recall but I would recognize him if I saw him as the CUP (this is LAKE acknowledging that Biker was the CUP owner and Amy as his widow was the rightful owner of the CUP).

In the BLL, LAKE states Biker never had an interest in the Ramona property or, to the best of his knowledge, the Ramona CUP ([See Page 2, Para 3](#)) This is contradicted by the [2015 Ramona CUP Application](#) and the following chain of events:

During two off site conversations, one in January 2020 at a coffee shop and another which occurred on March 5, 2020, in front of my house, **LAKE, for the first time admitted to me having taken Biker's name off the CUP and then without my knowledge**, put the CUP in Bowden's name for tax and "headache." I'm not sure what LAKE meant by the CUP being a headache. Perhaps his headache was trying to defraud me with the CUP transfer. In any event I would be curious to find out if the Ramona CUP was ever put into Bowden's name and what financial consideration was part of that transaction.

LAKE never ONCE mentioned the Ramona CUP transfer in the first meeting of January 2020. The CUP transfer had purportedly occurred years earlier. What LAKE was relying on during this first offsite meeting is that I would not have been aware of this information. LAKE relied on my ignorance and his assertions that would have denied me any equity consideration as part of the CUP transfer which, had Biker been alive would have been his.

When LAKE confirmed what my research had already discovered I was furious with him and asked him what percentage I would be getting moving forward because he left me in a terrible place for negotiating any aspect of this transaction. LAKE told me I would be getting nothing because Biker's work was "worthless." I was dumbfounded and pissed beyond measure! LAKE would have me believe, 4 years after Biker's death, that Biker did all this work, put his name on the CUPs to see them approved but that his life's work was worth nothing! According to LAKE, Biker did all this sweat equity work just to help other people get rich. Of course, this is absurd! Even sweat equity requires a return on that investment and per LAKE there was to be none! (*See Amy Sherlock's Verification Statement below*)

4. [See Page 2, Para 5](#) I never knew about the personal "two-week Lake Bridge Loan" (LBL) in the amount of \$289,560.68. I have no record of that money ever being paid to Biker or seen a fully executed promissory note.

Biker's secretary at the time was Stephanie Hess. They were extremely close. Like in a brother-sister type of relationship. After Biker's death I spoke with Hess on numerous occasions about how he had purportedly committed suicide. Hess was skeptical of the suicide determination. In fact, she had scheduled meetings between Biker and his partners to discuss CUP related issues for the following day. Per her beliefs at the time, she so reason to believe that Biker was suicidal. She also never mentioned the LBL that per LAKE, Biker alone was in default on. Indeed, my last correspondence with Hess occurred in June 2020 when I saw her as I was in the process of leaving San Diego to move Texas. We met as she was there was a 1-hour meeting to wish me goodbye. During that meeting I told Hess that I was leaving California because I had come to suspect, based on the ME Report, that Biker was murdered, and I was leaving San Diego for my safety. She was shocked by this revelation. The information I was giving her came straight from the ME Report and has been detailed in my [Statement re the ME Report](#). In the five years after Biker's death and before I left for Texas, Hess could have allayed my suspicions of there being a personal LBL that would have caused Biker the type of stress that may

have led to a suicide. It's not until LAKE offers this scenario, for the first time, in the BLL that it is presented as the rationale for his purported actions the night of his death.

If Biker was personally responsible for the LBL than there should have been documentation between LERE and Biker that would have memorialized any consideration between them. This too is information I have never seen In furtherance of other possible LBL scenarios in whereby it was not a personal loan to Biker then the deed should have been between LAKE and LERE.

"LAKE would sell the Balboa property to recoup his investment." LAKE held onto the Balboa property for another year, until Harcourt could put the CUP in his name and negotiate a deal with Milan and Razuki which helped them start a licensed business that, had it been left in Biker's name, I would have provided me an interest in that dispensary or proceeds from the sale.

5. [See Page 3, Para 1](#) "received a legal opinion advising that any attempt to overturn the recent amendment would be very unlikely" Who's opinion was this? I would not be surprised if it turned out to be the Bartell attorney Gina Austin, who also represents Milan and Razuki and who ultimately ended up with the property and the CUP. We need a copy of that opinion or at least the name of the attorney who they say gave Biker that opinion. I don't believe it! Why would Biker, LERE, Harcourt and perhaps LAKE accept that legal conclusion!? What they are being told is that they went into a deal to occupy that property for the purposes of operating a licensed dispensary. The Property Owner, Maria Sandoval SIGNED OFF on page 29 of the [DSD Ownership Disclosure Statements](#). How was this not legally contestable? And after Bikers death there now exists a dispensary! And, on April 5, 2021 I try to [MOTION TO INTERVENE](#) in [SDPCC INC v RAZUKI INVESTMENTS](#) to assert as one of my causes of action that [FRAUD](#) was committed.

On 04/05/21 [Opposition](#) was filed to my MOTION TO INTERVENE.

On 05/14/21, upon hearing oral arguments the [MOTION TO INTERVENE was DENIED](#) with Judge Sturgeon stating my claim was untimely and to allow me to intervene would only complicate the case.

On 07/13/21 a [Notice of Appeal](#) was filed by Flores regarding the DENIAL decision.

On 01/26/22 the District Court of Appeal [dismissed my appeal](#) because no brief had been filed.

The rationale I was given for dismissing the appeal was that the appeal would drag out for months but a new state court case, [SHERLOCK ET AL v LAKE ET AL](#) filed on 12/22/21, would put the matter in a different court whereby we would have an expedited schedule and would also, among other things, be naming LAKE as a co-defendant.

On 03/29/22 a [MINUTE ORDER](#) was issued which puts the SDPCC INC v RAZUKI INVESTMENTS trial on calendar for March 17, 2023.

6. [See Page 3, Para 2](#) If the loan was to Biker, why is Harcourt involved? Sounds like they're both responsible for the loan in this paragraph.

7. [See Page 3, Para 2](#) "loan goes into default." I find it difficult to believe that neither Harcourt nor Biker could find financing for \$289K. Harcourt is a high-net-worth individual who drives a car that's worth nearly half of that and has significant family resources. Why was the CUP dependent on

the LBL which considering Bikers miserable financial health was an absolute certainty would not meet the terms of the LBL should that note even exist? Why was Biker shouldering all the responsibility? I want to see the unforged LBL note signed by Biker! Also, contrary to LAKE's description in the LBL I was not "happy that LAKE and his family would be getting their money back." This is a complete fabrication as I was unaware any of these transactions were going on. I suspect that the LBL was never paid in the first place. That should it have defaulted and with Biker's death, Harcourt would have stepped in and paid LAKE the \$289K and that ultimately, in September 2016, when LAKE received the \$375K from LERE that LERE would have got none of those proceeds? Amy Sherlock was ripped off by these scoundrels. Her husband paid with his life and her children are growing up without a father.

8. [See Page 3, Para 4](#) "Lake observed Biker's demeanor and behavior." A few days after Biker passed, LAKE brought who he introduced as [a CTE expert, Dr. Mark Cooper](#) to my house as a "favor" to LAKE to spent the entire time trying to convince me and Biker's immediate family (Ann, Margaret, Mary, Marjorie, Tony and Pat Sherlock) of CTE and suicide. Also I would note this guy was creepy and tried to hit on me as a distressed widow. I got out of there but in hindsight I should have reported him to a licensing authority.

Looking back, if I knew what I know now, my answers to affirming his acting strangely would've been likely the same but for a different reason. **Biker knew they were going to kill him.** That's why on December 2, 2015, at 9:00PM when he left the house, he took his gun! It was for defense against people who he knew were criminals and as the CI statement further confirms! Anyone would be acting strangely if in the same situation. Dr. Cooper is a child psychologist specializing in ADHD. It was critical to LAKE'S plan to ensure that I/we believed he had committed suicide.

On or around 12/06/15 one of the aforementioned family members, Ms. Margaret Sherlock (Biker's sister) was witness to Dr. Cooper's attempts to convince the family that Biker's death was a suicide. As a family and for and all in attendance, it was strange that LAKE took it upon himself to bring Dr. Cooper to this family gathering in which we were all trying to make sense of what had happened. Margaret is an attorney. Margaret, who was very close to Biker, did not for one second believe that Biker took his own life. She, as well as the rest of us, was not accepting the COOPER/LAKE narrative that suggested Biker suffered from CTE. In hindsight why this excuse was being offered the family then appears to be nothing more than an attempt to mollify our family to what was being described as a very troubled mentally ill person. Had they known that LAKE was at the heart, the very core of Biker's financial issues the family would have collectively seen these two to the curb.

9. [See Amy Sherlock Statement and Michael Sherlock ME Report](#) in which I detail the contradictions which exist to the suicide determination are as follows:

9.1 Biker was right-handed, and the gun was found near his left hip. Any simple forensic analysis of the gun location that considers the weight of the gun, the angle that the gun was at when fired and the recoil which would have pushed the gun away from the body would be relevant to determining the actual cause of death.

9.2 "There was no obvious gunshot residue listed on either hand." This may be because **they didn't perform this test!!**

9.3 "The magazine was partially ejected." This too is an abnormality.

9.4 There were abrasions on his right knuckles that I was not aware of. I would have noticed these cuts had they been there when Biker was at dinner earlier. In fact the ME who visited me the day after his death 12/03/15 asked me if Biker "worked on engines?" I told her he did work on engines but was unaware that she was trying to come up with a reason for these cuts. It wasn't until I

read the ME report in February 2020 that I came to understand that the ME Report's explanation of cuts on his knuckles was an attempt to fit those wounds into something other than a fight for his life. **I am 100% certain that Biker did not have these fresh cuts which the ME determined had come from his "working on engines."**

9.5 **"The casing was never found."** How in the hell can that be? At best this is an example of shoddy crime scene protocols at worst it is a conspiracy to hide evidence. Keep in mind that if you don't find a casing it would be even more important to have taken that test! Not taking is hiding the fact that no GSR was found because Biker did not pull the trigger that night!

10. [See Page 3, Para 5](#) The entire paragraph is just to score hero points as in LAKE coming to my rescue. It was my policy for Biker. It was current (sorry for the confusion LAKE, my husband had just died) and LAKE's "industry resources" were his stepfather calling in to make the claim on my behalf. The call was a few minutes and did not require any "industry-resources" help to initiate and pay me the death benefits I was due.

11. [See Page 3, Para 5](#) The entire paragraph is completely false. Biker's funeral was December 12, 2015. There is absolutely no possibility that this conversation took place on December 13 or 14<sup>th</sup>. LAKE is a smart businessman. Why would he have this meeting with his sister-in-law the day after his funeral and have absolutely no business documentation be available for that meeting. IF LAKE had wanted to tell me what was going on with the business, why wait two weeks? The body was already cremated. Notice that in these supposed business meetings that he doesn't tell me about the dissolution papers being signed or Biker's intent. Only gives me the alleged information to make it look like Biker look like he had failed as a businessman, a father and a husband.

12. [See Page 3, Para 7](#) This entire paragraph is another complete fabrication. LAKE offers no proof or witnesses to the sale of the property for \$375K. If I was aware of anything, then why wasn't I invited to the grand opening? Asked to follow on social media? Asked to tell my friends? Given a friends and family discount? Sent an email? There's nothing provided because LAKE's intent was to keep me uninformed. Paragraph 8 "sold for \$375k" so an \$86k profit. "September 19 the Balboa property closed." This was 10 months later and after Harcourt had transferred the CUP to his name. Had Lake been just out to recoup his investment, he would've just sold it immediately.

Of note, it is at this point in the BLL that LAKE states "Sherlock was undoubtedly aware that the Balboa property along with the Balboa CUP were being sold in an effort to allow LAKE to recoup his investment." Per LAKE, this transfer occurred on September 19, 2016. I will repeat; I was not aware of the transfer and the fact that LAKE even states this presumes, that I had an interest in the sale of the CUP and property. Had I not an interest, why would LAKE care what I knew and when?

13. [See Page 4, Para 2](#) The only part of this statement that I would agree with is where LAKE states: "Sherlock was involved in the decision not to litigate the HOA." This too is a LAKE contradiction if I do not have a successive interest, why am I being apprised of and even involved in the decision-making process of the CUP and the property if I do not have a beneficiary interest?

As has been previously stated ([See Page 2, Para 6](#)) where the decision to "walk away from Balboa" was based in large degree to an attorney haven given the legal opinion that LAKE, HARCOURT and BIKER could not prevail in any litigation challenging the CUP allowing the operation of a licensed cannabis business at Balboa. I would add that to simply "walk away" after the amount of time and money was spent on a project that was not disallowed by the HOA and then purportedly the HOA amends their policy to disallow a licensed CUP is a financial strike against the property owner as well as

Biker and his partners. It is hard to believe that they received competent, unbiased legal advice to cut their losses as it were and simply “walk away.”

The only information LAKE gave me was the day or so after Biker died. When I asked, “What about Balboa?” LAKE responded, “Biker blew it. Balboa isn’t happening. We’re all walking away licking our wounds.” This to me, and everyone else meant the building would be sold and LAKE and Harcourt would not be pursuing a retail dispensary because according to them, it couldn’t happen at that location. I felt it was safe for me to believe this was true because the CUP was in Biker’s name. They’d need me to help transfer it OR the nagging feeling I had that they’d have to forge Biker’s signature. An [illegal transfer of title](#) filed 18 days after his death seemed brazen and stupid. I didn’t want to believe that my friends and family would engage in this when it meant stealing from the widow of who had been their business partner and successfully acquired the CUP licenses they would be divvying up without consideration of their deceased partner or his family. In 2020 a [forensic analysis \(Page 8\) of Biker’s signature](#) on the CUP transfer was done and concluded that Biker’s signature was forged.

In hindsight, I naively believed the San Diego Development Services Department (DSD) was looking out for corrupt CUP transfers such as this. I knew that the DSD case manager, Ms. Edith Gutierrez had established a personal relationship with Biker, meaning that she acted like she had Biker’s back in “pushing things through for them” to the extent she would’ve given Biker or even me the heads up if Harcourt transferred the CUP after Biker died. While I believed that, as a result of Bartell introducing Gutierrez to Biker, Biker came to believe that the Bartell/DSD connection as managed by Gutierrez, was one that exceeded the normal CUP processing conditions with DSD. In other words, this “special handling” by Gutierrez was Bartell’s way of proving that he controlled the process and Biker, and what I believed would also be his heirs, would be protected by Bartell and DSD throughout the CUP acquisition or any transfer that were to take place.

At the [04/22/15 DSD Planning Commission Hearing for the 8863-E Balboa CUP](#) it can be seen that Gutierrez lobbied for the CUP to be approved in Biker’s name and it was continued to June 17, 2015.

At the [06/17/15 DSD Planning Commission Appeal Hearing for the 8863-E Balboa CUP](#) the CUP was approved on a 5-1-1 vote.

At the [06/25/15 Planning Commission Hearing](#) Edith Gutierrez represented DSD staff. The 8863-E hearing was rescheduled to 07/09/15

At the [07/09/15 Planning Commission Hearing](#) the minutes show that DSD staff was represented by Edith Gutierrez. Speaker slips in favor of Biker being awarded the CUP were most notably Jim Bartell, Abhay Schweitzer, Bradford Harcourt, Michael Sherlock and Stephanie Hess. The most notable opposition at this hearing came from Judi Strang ( perennial opposition amongst CUP applicants) and attorney David Demian many of who are named defendants in my federal complaint: [SHERLOCK ET AL v THE CITY OF SAN DIEGO](#) and the related [COTTON v CITY OF SAN DIEGO ET AL](#) case.

14. [See Page 4, Para 3](#) The only “turmoil” I face in life has to do with LAKE and the lies he has spun to perpetuate the narrative that Biker committed suicide and had LAKE stealing the CUP’s value from me and my boys in this Machiavellian attempt to enrich himself at the expense of Biker. While recounting these events I am forced to relive Biker’s death all over again. Additionally, I have lost my family. Nobody speaks to me. And if that isn’t enough, I’m forced to find vindication through a judiciary that seems uninterested in hearing the facts of my case. **My “turmoil” is 100% LAKE’S fault for being dishonest.** I wish he would’ve taken the familial history into account when he lied to me about Biker’s death and his business situation and then continues, to this day, to lie to cover it up.

15. [See Page 5, Para 2](#) I'm not a lawyer but the "Market Participant" arguments being made here seem ridiculous to me. Biker was on the CUP for both Balboa and Ramona when he died. According to LAKE, Biker was the purchaser of the Balboa property at one point. As a widow, I should have inherited Biker's assets.

**Conclusions:** Losing a husband is a harrowing experience. Having his death ruled a suicide is even worse when the evidence does not support that cause of death. In the 7 years since Biker's death, I have come across information that corroborates what it is I knew to be suspicious events surrounding Biker's death. As has been depicted herein, there were substantial financial interests that would have been of benefit to those who would maintain a licensed CUP in Biker's absence. Additionally, there is now "insider" testimony by someone, who in a 2017 interview with the [Chris Williams Canna-Chronicle](#) reporter Cara Anderson, interviews "Phil" who was/is familiar with the inner workings of Bartell and his crew in acquiring these CUPS in San Diego by use of proxy applicants such as Biker [where Phil states that Biker's death was not a suicide](#). In this interview "Phil" lays forth the mechanics of what these people do with proxy licensee applicants who describes what happens once the proxy acquires the license and the proxy doesn't hand it over to the criminals.

The evidence of criminal wrongdoing is overwhelming. It takes demanding that justice be served, and criminals be prosecuted. As it relates to Biker's death and his memory, I will never give up on seeing that justice is done.

**Verification of Pleading (Code Civ. Proc., § 446)  
Declaration under Penalty of Perjury Form (Code Civ. Proc., §§ 446, 2015.5)**

I, Amy Sherlock have read the foregoing Reply and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein stated on information and belief, and, as to those matters, I believe it to be true. Executed electronically on June 16, 2022, at San Diego County, California. I declare (or certify) under penalty of perjury that the foregoing is true and correct.

\_\_\_\_\_/s/\_\_\_\_\_  
Amy Sherlock