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Superior Court of California,
County of San Diego

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Clerk of the Superior Court
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**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;
EULENTHIAS 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 CONTINUED MOTION
AND RENEWED 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: FEBRUARY 27, 2026
TIME: 9:00 AM
DEPT.: C-75**

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TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on February 27, 2026, at 9:00 A.M., or as soon thereafter as the matter may be heard in Department 75 of the above-entitled Court, located at Hall of Justice, Sixth Floor, 330 W Broadway, San Diego, California 92101, Plaintiff, Amy Sherlock, individually and as successor-in-interest to Michael Sherlock, deceased, and on behalf of her minor children, will and hereby does move for leave to file a Second Amended Complaint.

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

DATED: February 5, 2026

KELLEY | CLARKE, PC

By: 
Matthew M. Clarke
Attorneys for PLAINTIFFS

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)
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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 with the correct and complete factual record rather
16 than under a superseded pleading.

17 **IV. CONCLUSION**

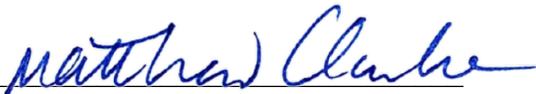
18 The proposed amendment narrows and clarifies the case, incorporates material evidence
19 discovered in 2023–2024, and conforms the pleading to the Court’s prior rulings. Because it is made
20 in good faith, will not prejudice defendants, and promotes judicial economy, Plaintiffs respectfully
21 request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

- 22 • Grant leave to file the Second Amended Complaint attached as **Exhibit 1**;
 - 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: February 5, 2026

KELLEY | CLARKE, PC

By: 
Matthew M. Clarke
Attorneys for PLAINTIFFS

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.

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Good-Faith Basis

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

Conclusion

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

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on February 5, 2026, at Prosper, Texas.


Matthew Clarke

EXHIBIT 1

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15 Attorneys for Plaintiffs

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

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

20 Plaintiffs,

21 v.

22 BRADFORD HARCOURT, an individual;
23 EULENTIAS DUANE ALEXANDER, an
24 individual; STEPHEN LAKE, an individual,
25 NINUS MALAN, an individual; SALAM
26 RAZUKI, an individual; OLIVE TREE
27 PATIENTS ASSOCIATION, a California
28 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

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.

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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,
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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.

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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.

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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.

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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

EXHIBIT 2

1 ANDREW FLORES, ESQ (SBN:
2 Matthew M. Clarke, State Bar No. 184959
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17 Afloreslaw@gmail.com

18 Attorney~~Attorneys~~ for Plaintiffs

19 Amy Sherlock, Minors T.S.
20 and S.S.

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SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR
COUNTY OF SAN DIEGO – CENTRAL 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;
EULENTHIAS 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 **INTRODUCTION AND PRELIMINARY STATEMENTS**

2 Plaintiffs Amy Sherlock, T.S., and S.S. bring this action to recover property and S.S., upon
3 ~~information and belief, allege as follows:~~

4 **INTRODUCTION**

5 1. ~~damages resulting from a conspiracy to defraud them of their rightful inheritance~~
6 ~~following the death of~~ Michael “Biker” Sherlock ~~was a~~, husband, ~~and~~ father, ~~to~~ Plaintiffs, a
7 professional athlete, and ~~an~~ entrepreneur with ~~various business~~ significant investments ~~including~~ in
8 the cannabis sector.

9 ~~2. — Mr. Sherlock is the husband and father of plaintiffs Amy Sherlock and T.S. and S.S.~~
10 ~~(collectively, Mrs. Sherlock, T.S. and S.S., the “Sherlock Family”).~~

11 ~~3. — In early through mid-2015, Mr. Sherlock acquired sole and ultimate beneficial~~
12 ~~ownership of two highly lucrative cannabis permits to operate cannabis dispensaries.~~

13 ~~4.2. Mr. Sherlock also~~ and became ~~the~~ Chief Executive Officer and ~~a~~ Managing Member of a
14 limited liability company that ~~acquired a cannabis compliant real property at which one of the~~
15 ~~permits was issued to operate a dispensary (Mr. Sherlock’s ownership interest in the two permits,~~
16 ~~collectively with his unit membership in the LLC (and vicariously thereby the cannabis owned~~
17 ~~cannabis-compliant real property),, collectively referred to as~~ the “Sherlock Property”).”.

18 ~~5. — On December 3, 2015, Mr. Sherlock passed away. Mr. Sherlock purportedly committed~~
19 ~~suicide.~~

20 ~~6. — intestate.~~ At the time of his death, the Sherlock Property was worthvalued at least
21 \$14,000,000.

22 ~~7. — Yet, according to defendant Steven Lake, Mr. Sherlock purportedly committed suicide~~
23 ~~because he was insolvent and was severely depressed because he was insolvent.~~

24 ~~8.3. Mr. Sherlock passed away without a will.~~ Pursuant to California probate law, the
25 Sherlock Property became the property of the Sherlock Family ~~upon his death,~~ and ~~the~~ transfer of
26 title ~~of the Sherlock Property needed to go through~~ required probate ~~court~~ proceedings.

27 ~~9. — Plaintiffs bring this action against~~ allege that Defendants ~~alleging they~~ conspired to ~~and~~
28 ~~did~~ defraud the Sherlock Family ~~of their ownership interest in the Sherlock Property. Specifically, that~~

1 upon the death of Mr. Sherlock, Defendants conspired to make by making false representations to the
2 Sherlock Family regarding ownership of the Sherlock Property and forged, forging documents to have
3 Mr., and unlawfully transferring Mr. Sherlock's ownership interests in the Sherlock Property
4 transferred to themselves to steal the Sherlock Property from the Sherlock Family.

5 ~~10.4. Defendants have not, as of the filing of this Second Amended Complaint (SAC), ever~~
6 ~~provided any explanations, much less contracts, regarding how they lawfully transferred the~~
7 ~~Sherlock Property to themselves after the death of Mr. Sherlock without going through, bypassing~~
8 probate court as required requirements.

9 11. — To state this simply, this case is about money and unbridled greed. Mr. Sherlock
10 acquired two permits to operate dispensaries that were worth millions, that would produce millions in
11 profits, and Defendants stole the permits and real property from the Sherlock Family.

12 ~~12.5. Under every applicable law and doctrine, have failed to provide any lawful explanation~~
13 ~~or documentation for the transfer of the Sherlock Property after Mr. Sherlock's death. Plaintiffs seek~~
14 ~~the law and justice require that return of the Sherlock Property be returned to the Sherlock Family~~
15 ~~and that Defendants be held accountable for their theft and the many years of, damages for~~
16 emotional pain and financial suffering they have been forced to endure harm, and accountability for
17 Defendants' actions.

18 ~~6. This action is brought under theories of conversion, civil conspiracy, unfair competition~~
19 ~~and unlawful business practices, and declaratory relief, seeking to restore justice and remedy the~~
20 ~~years of suffering endured by the Sherlock Family.~~

21 **A. JURISDICTION AND VENUE**

22 ~~13.7. Defendants are subject to the~~ This Court has jurisdiction over all causes of this
23 ~~Court~~ action asserted herein by virtue of their Defendants' business dealings and transactions in
24 California, and by having caused injuries within the City and County of San Diego.

25 ~~14.8. This Court has The~~ subject matter jurisdiction over all causes of action asserted herein.
26 Plaintiff's proper as Plaintiffs' claims arise exclusively under the laws of the State of California, do
27 not arise under federal law, are not preempted by federal law, and do not challenge conduct within
28 any federal agency's exclusive domain.

1 ~~15.9.~~ Venue is proper in this county because the acts taken by ~~defendants were~~
2 ~~taken~~Defendants occurred within the County of San Diego, and the subject real properties are
3 located within the County of San Diego.

4 **B. PARTIES**

5 ~~16.10.~~ Plaintiff AMY SHERLOCK, an individual, at all material times herein was residing
6 and working in the County of San Diego, California.

7 ~~17.~~ Plaintiff T.S., progeny of Mr. and Mrs. ~~Sherlock, an individual, was, and at all~~
8 ~~material times herein, living in the County of San Diego, California.~~

9 ~~18.11.~~ Plaintiff S.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 ~~19.12.~~ ~~Stephen Lake~~ Plaintiff S.S., progeny of Mr. and Mrs. Sherlock, an individual, was, and
12 at all material times ~~mentioned~~ herein ~~residing and working, living~~ in the County of San Diego, ~~State~~
13 ~~of~~ California.

14 ~~20.13.~~ ~~Bradford Hareourt~~ Defendant STEPHEN LAKE, an individual, was at all material
15 times mentioned herein residing and working in the County of San Diego, State of California.

16 ~~21.14.~~ ~~Eulenthias Duane Alexander~~ Defendant BRADFORD HARCOURT, an individual,
17 was at all material times mentioned herein residing and working in the County of San Diego, State of
18 California.

19 ~~22.15.~~ ~~Salam Razuki~~ Defendant EULENTIAS DUANE ALEXANDER, an individual, was
20 at all material times mentioned herein residing and working in the County of San Diego, State of
21 California.

22 ~~16.~~ ~~Ninus Malan~~ Defendant SALAM RAZUKI, an individual, was at all material times
23 ~~mentioned herein residing and working in the County of San Diego, State of California.~~

24 ~~23.17.~~ Defendant NINUS MALAN, an individual, was at all material times mentioned herein
25 residing and working in the County of San Diego, State of California.

26 ~~24.18.~~ ~~Olive Tree Patients Association~~ Defendant OLIVE TREE PATIENTS
27 ASSOCIATION, a corporation under the laws of the State of California, doing business as Olive
28

1 Tree Wellness Center, was at all material times mentioned herein had its principal place of business
2 and conducted business in the County of San Diego, State of California.

3 ~~25.19. Prodigious Collectives~~ Defendant **PRODIGIOUS COLLECTIVES**, LLC, a limited
4 liability company under the laws of the State of California, doing business as The Reserve SD, was
5 at all material times mentioned herein had its principal place of business and conducted business in
6 the County of San Diego, State of California.

7 ~~26.20. Allied Spectrum, Inc~~ Defendant **ALLIED SPECTRUM, INC.**, a corporation, under the
8 laws of the State of California, was at all material times mentioned herein had its principal place of
9 business and conducted business in the County of San Diego, State of California.

10 ~~27.21.~~ The true names and capacities, whether individual, corporate, associate or otherwise,
11 of Defendants ~~Does~~ **DOES** 1 through 50, inclusive, are unknown to Plaintiffs, who therefore sue said
12 defendants by such fictitious names pursuant to Code of Civil Procedure § 474. ~~Plaintiff~~ **Plaintiffs**
13 further ~~alleges~~ **allege** that each of said fictitious Doe defendants is in some manner responsible for the
14 acts and occurrences hereinafter set forth. ~~Plaintiff~~ **Plaintiffs** will amend this Complaint to show their
15 true names and capacities when the same are ascertained, as well as the manner in which each
16 fictitious defendant is responsible for the damages sustained by Plaintiffs.

17 ~~28.22.~~ At all relevant times, each defendant was and is the agent of each of the remaining
18 defendants and, in doing the acts alleged herein, was acting within the course and scope of such
19 agency. Each defendant ratified and/or authorized the wrongful acts of each of the defendants.

20 ~~29.23.~~ Defendants, and each of them, are individually sued as participants and as aiders and
21 abettors in the unlawful acts, plans, schemes, and transactions alleged in this Complaint. Defendants,
22 and each of them, have participated as members of the conspiracy alleged herein, acted in
23 furtherance of it, aided and assisted in carrying out its purposes, performed acts and made statements
24 in furtherance of the conspiracy, and/or ratified the acts taken in furtherance of the conspiracy.

25 **GENERAL ALLEGATIONS**

1 **Material Background.**

2 **C. MATERIAL FACTS**

3 **1. Acquisition of the Sherlock Property and Cannabis Permits**

4 A.24. In or about 2015, Michael “Biker” Sherlock, a professional athlete and entrepreneur,
5 acquired sole and ultimate beneficial ownership of two highly lucrative cannabis permits are
6 personal to operate dispensaries in San Diego County, California. These permits, together with his
7 unit membership in a limited liability company that owned cannabis-compliant real property, are
8 valued at \$7,000,000, and can generate a million in sales a month collectively referred to as the
9 “Sherlock Property”.

10 30. — ~~The motive behind the actions taken by defendants giving rise to this action are the~~
11 ~~incredible profits generated by dispensaries. The desire for money.~~

12 31. — ~~The most successful cannabis attorney in San Diego is attorney Gina Austin originally~~
13 ~~a defendant in this action.~~

14 32. — ~~In the words of Austin in a related case regarding the value of a cannabis license, one~~
15 ~~of the permits at issue here, she stated before the Honorable Judge Eddie C. Sturgeon the following:~~

16 MS. AUSTIN: I — ~~from an expert's opinion, I have to say that the sale of~~
17 ~~dispensaries in San Diego county are — is not relevant to whether they're~~
18 ~~operating or not operating. If they were doing a lot of revenue, at least a~~
19 ~~million a month, there would be a premium on it. But the most recent~~
20 ~~dispensary that hasn't even opened up yet, doesn't — hasn't finished its~~
21 ~~entitlement and hasn't built out, sold for 7 million, Your Honor.~~

22 THE COURT: I assume the license is what's valuable.

23 MS. AUSTIN: The license is what's valuable, Your Honor.

24 THE COURT: And the last one sold for how much?

25 MS. AUSTIN: ~~Seven million.~~

26 33. — ~~In regard to the profits produced by a dispensary, Austin represented in the same matter~~
27 ~~that the Balboa Dispensary generates up to a “Hundred thousand dollars” on weekends.~~

28 34. — ~~In sum, dispensary licenses are worth at least \$7,000,000, can generate over a million,~~
~~and the specific dispensary at issue here that the Sherlock Family claims, generates a “hundred~~

1 ~~thousand dollars” on weekends.~~

2 ~~35. — People kill for a fraction of the money that is at issue in this case.~~

3 ~~36. — As this Court has ruled, contrary to Lake’s position, cannabis permits are personal~~
4 ~~property. (Attached hereto as Exhibit A is the Court’s ruling issued on August 19, 2022, holding~~
5 ~~same.)~~

6 ~~**MATERIAL STATE AND CITY LAWS REGARDING CANNABIS APPLICATION**~~
7 ~~**REQUIREMENTS.**~~

8 ~~37. — At all material times related to this action, California’s cannabis licensing statutes have~~
9 ~~required any party engaging in commercial cannabis activities to possess both a state license and local~~
10 ~~government approval such as a permit, CUP or license.~~

11 ~~38. — Upon information and belief, at all material times related to this action, California Bus-~~
12 ~~& Prof. Code (“BPC”) § 19323 et seq. or BPC § 26057 et seq. mandated the denial of an application~~
13 ~~for a cannabis state license by an applicant who, inter alia, has been sanctioned for unlicensed~~
14 ~~commercial cannabis activities in the preceding three years; failed to provide required information in~~
15 ~~an application (including disclosure of all individuals with a direct ownership interest in the license~~
16 ~~being applied for); or failed to comply with local government requirements for the issuance of a permit,~~
17 ~~CUP or license for cannabis activities.~~

18 ~~39. — The Courts have disagreed with the preceding holding that the Department of Cannabis~~
19 ~~Control has complete discretion in whether to approve cannabis licenses by applicants, even if they~~
20 ~~have been sanctioned for operating illegal dispensaries. Plaintiffs respectfully disagree.~~

21 ~~**Mr. Sherlock, the Sherlock Family and the acquisition of the Sherlock Property.**~~

22 ~~40. — On April 22, 2014, Mr. Mr. Sherlock incorporated United Patients Consumer~~
23 ~~Cooperative (“UPCC”).~~

24 ~~41.25. By no later than 2015, Mr. Sherlock) on April 22, 2014, and subsequently partnered~~
25 ~~with defendants Steven Lake and Bradford Harcourt to create and operate multiple businesses in the~~
26 ~~cannabis sector such as investing, including investments in cannabis-compliant real estate properties,~~
27 ~~cultivation, and sales.~~

28 ~~42.26. In January 2015, the Town of Ramona, within the County of San Diego, approved~~
~~Mr. Sherlock’s application for a permit to operate a dispensary at 1210 Olive Street, Ramona, CA~~

1 92065 (the “Ramona Permit” and the “Ramona Property”). The Ramona Permit was issued to Olive
2 Tree Patients Association (“Olive Tree”), of which Mr. Sherlock was the sole beneficial owner.

3 ~~43.~~—On June 18, 2015, Leading Edge Real Estate, LLC (“LERE”) became the owner of
4 8863 Balboa Avenue, Suite ~~Unit~~E, San Diego, California 92123 (“Balboa Property”).

5 ~~44.27.~~ ~~On or before~~ By August 3, 2015, Mr. Sherlock ~~became~~was the Chief Executive
6 Officer and a Managing Member of LERE.

7 ~~45.28.~~ On or about July 9, 2015, the City of San Diego approved Mr. Sherlock’s application
8 for a conditional use permit for a cannabis dispensary to ~~Mr. Sherlock’s holding entity~~, UPCC at
9 ~~8663 Balboa Avenue, Suite E, San Diego, CA~~ (the “Balboa Property” and the “~~(~~“Balboa Permit”).

10 ~~46.~~—(Hereinafter, ~~Mr. Sherlock’s interests in LERE (and vicariously thereby in the Balboa~~
11 ~~Property), the Balboa Permit, and the Ramona Permit, the “The Sherlock Property.”)~~

12 ~~47.29.~~ ~~On December 2, 2015, Mr. Sherlock left his home, at the time of Mr. Sherlock’s~~
13 ~~death, was valued at least \$14,000,000, with individual cannabis permits valued~~ at approximately
14 ~~9:00 p.m.~~ \$7,000,000 and capable of generating over a million dollars in monthly sales.

15 2. Death of Michael Sherlock and Probate Implications

16 ~~48.~~—On December 3, 2015, Mr. ~~Sherlock’s body was found after Sherlock passed away~~
17 ~~intestate, purportedly having committed by~~ suicide via a self-inflicted gunshot wound.

18 ~~49.~~—On December 3, 2015, Lake spoke with. ~~However, subsequent forensic analysis has~~
19 ~~cast doubt on the crime scene officers who described circumstances of his conversation with Mr.~~
20 ~~Sherlock the previous day where Lake alleges that they spoke about “little things.”~~

21 ~~50.~~—On December 3, 2015, Lake spoke with law enforcement officers regarding Mr.
22 ~~Sherlock and did not state in any manner that Mr. Sherlock signed away or transferred the Sherlock~~
23 ~~Property, which was valued to be at least \$14,000,000.~~

24 ~~51.~~—Shortly after Mr. Sherlock’s death, Lake told Mrs. Sherlock that Lake, Harecourt and
25 ~~Mr. Sherlock had to “walk away” from the Balboa Permit and Property because it was too expensive~~
26 ~~to continue to finance certain litigation regarding the Balboa Property required to open the dispensary~~
27 ~~stating, “the dispensaries were worthless.”~~

28 ~~52.~~—At various points in time after Mr. Sherlock’s death, Lake told Mrs. Sherlock that the

1 ~~facility operating under the Ramona Permit at the Ramona Property was not making any profits and~~
2 ~~that there were no distributions for the owners.~~

3 ~~53.30. Lake's statements to Mrs. Sherlock were unilaterally false as detailed below.~~

4 ~~54.31. Pursuant to California probate law, the Sherlock Property became the property of the~~
5 ~~Sherlock Family upon the death of Mr. his wife, Amy Sherlock, and the children, T.S. and S.S. —~~
6 ~~upon his death. The transfer of title to the Sherlock Property was required to go through probate~~
7 ~~court.~~

8 ~~55. — Lake's false statements were made by Defendants, including Lake to deceive Mrs.~~
9 ~~Sherlock into thinking that Mr. Sherlock did not own the Sherlock Property so that he could steal the~~
10 ~~Sherlock Property for himself and Harcourt.~~

11 ~~III.32. The transfers, made false representations to Mrs. Sherlock regarding the value and~~
12 ~~ownership of the Sherlock Property after the death of Mr. Sherlock, Use of Death Certificate,~~
13 ~~claiming insolvency and lack of value to discourage the family from pursuing their inheritance.~~

14 ~~56. — It is unclear how the Sherlock Property could have been lawfully transferred after the~~
15 ~~death of Mr. Sherlock. The information available to the Sherlock Family is contradictory and~~
16 ~~confusing.~~

17 ~~3. — However, Fraudulent Transfers and Forged Documents~~

18 ~~57. — Plaintiffs are informed and believe that defendants used a non-certified copy of Mr.~~
19 ~~allege that, following Mr. Sherlock's death certificate, Defendants conspired to help facilitate the~~
20 ~~transfer of defraud the Sherlock Property to defendants or their agents.~~

21 ~~58. — The Sherlock Family at no time provided anyone with a certified copy of such death~~
22 ~~certificate. Certified copies of death certificates may be used for official business with both~~
23 ~~commercial and governmental agencies, non-certified copies are not.~~

24 ~~59. — Only certain individuals are authorized to obtain certified copies of death certificates;~~
25 ~~Plaintiffs are informed and believe that defendants were not authorized to obtain a certified copy of~~
26 ~~Mr. Sherlock's death certificate.~~

27 ~~60. — Despite this the defendants used such non-certified copies to facilitate the transfer.~~

28 ~~61. — Had this information been requested by the defendants, Plaintiff's would have known~~

1 of their ~~intent to transfer ownership interests in the~~ Sherlock Property ~~or would have inquired as to its~~
2 ~~use.~~

3 62. — ~~Plaintiffs are informed by forging documents and believe that this was another effort to~~
4 ~~purposefully conceal the transfer from of the Sherlock Property.~~

5 ~~—— **The Balboa Permit.**~~

6 63.33. ~~When Mrs. Sherlock was made aware that the Balboa Property and Balboa Permit~~
7 ~~were the subject of litigation between Harcourt and, among others, Razuki and Malan, she~~
8 ~~confronted Lake about his previous making false representations that the Balboa Permit had been lost~~
9 ~~due to litigation regarding the property to governmental agencies and the family.~~

10 64.34. ~~Lake admitted that he was responsible for and Harcourt, without the the required~~
11 ~~approval from a probate court-appointed executor or the consent of the Sherlock Family, transferred~~
12 ~~the Balboa Property claiming that Mr. Sherlock’s contributions were “worthless” and that the~~
13 ~~Sherlock Family could do nothing about it because they lacked wealth and associated permits to~~
14 ~~litigate the matter themselves and third parties through a series of transactions.~~

15 65. — ~~Public records reveal that, after the Mr. Sherlock’s death of Mr. Sherlock, the Balboa~~
16 ~~Property had three different permits issued to three different individuals, which is impossible as only~~
17 ~~one cannabis permit can be issued at a single property.~~

18 66. — ~~Harcourt judicially admits in a complaint against, among others, Razuki and Malan,~~
19 ~~that following Mr. Sherlock’s death, “he submitted documentation to the City of San Diego in order~~
20 ~~to remove Sherlock as the [Medical Marijuana Consumer Cooperative’s (MMCC)] responsible person,~~
21 ~~and HARCOURT then finalized the recording of the CUP with the City of San Diego under [San~~
22 ~~Diego Patients Consumer Cooperative]. Moreover, HARCOURT identified himself as the MMCC’s~~
23 ~~responsible person.”~~

24 67. — ~~First, City of San Diego Records show that on July 29, 2015, Mr. Sherlock acquired~~
25 ~~the recorded Balboa Permit.~~

26 68. — ~~Second, City of San Diego records show that on March 17, 2016, the Balboa Permit~~
27 ~~The permit was successively issued to Mrs. Sherlock.~~

28 69. — ~~Third, City of San Diego records show that on March 17, 2016, the Balboa Permit was~~

1 issued to Harcourt.

2 70. — Fourth, on January 30, 2017, the Balboa Permit was issued to Malan.

3 71. — Fifth, on February 27, 2017, the Balboa Permit was issued again to Harcourt.

4 72. — Harcourt, via his counsel, has for years repeatedly refused to provide an explanation as
5 to how Harcourt transferred the Balboa Permit to himself from Mr. Sherlock and why he did so.

6 73. — The information is confusing, contradictory, and cannot be true. Plaintiffs don't
7 understand how the City of San Diego could issue such contradictory information.

8 74. — More importantly, Mrs. Sherlock never applied with the City of San Diego to have the
9 Balboa Permit transferred to herself nor did she provide any information or execute any documents
10 for the background check with the San Diego Police Department that she passed as she came to learn
11 from her investigations.

12 75. — That application with Mrs. Sherlock's signature was forged.

13 76. — Lake forged or caused Mrs. Sherlock's signature to be forged on the application for the
14 transfer of the Balboa Permit and thereafter held himself out as her agent.

15 77. — It is unclear how these transfers were lawfully effectuated by the City of San Diego.

16 78. — However, at some point, the Balboa Permit did end up in the name of Harcourt.

17 79. — Thereafter, Razuki and Malan were able to get the Balboa Permit transferred to
18 themselves.

19 80. — Harcourt then filed suit alleging that, among others, Razuki and Malan had defrauded
20 him of the Balboa Permit by making misrepresentations to the City of San Diego who then transferred
21 the Balboa Permit to Malan.

22 81. — Then, Razuki and Malan had an ownership dispute over the dispensary operating at the
23 Balboa Property as only Malan's name was on the Balboa Permit.

24 82. — Razuki and Malan had agreed that Malan would be the only applicant disclosed in the
25 application for the Balboa Property, but that Razuki would be an undisclosed owner of the Balboa
26 Permit (the "Strawman Practice").

27 83. — On July 10, 2018, Razuki sued Malan for, among other things, his ownership interest
28 and share of the profits at Balboa.

84. — During the course of that litigation, Razuki tried to hire an assassin to kill Malan, but

1 ~~he was arrested by the Federal Bureau of Investigation.~~

2 ~~85. — Ultimately, the Balboa Permit was sold pursuant to a court-ordered sale to Prodigious.~~

3 ~~86. — Malan is the owner of Prodigious.~~

4 ~~87.35. To summarize, after the death of Mr. Sherlock, the Balboa Permit was issued to Mrs.~~
5 ~~Sherlock, Harcourt, and Malan, before ultimately ending up in the name of Malan and being sold to~~
6 ~~Prodigious Collectives, LLC pursuant to a court-ordered sale.~~

7 ~~— LERE and Mrs. the Balboa Property.~~

8 ~~88. — On or about June 4, 2015, LERE purchased the Balboa Property from Maria Sandoval~~
9 ~~for \$285,000.00.~~

10 ~~89. — Mr. Sherlock was the CEO and a Managing Member of LERE and Harcourt was a~~
11 ~~Managing Member of LERE as well.~~

12 ~~90. — Mr. Sherlock passed away on December 3, 2015.~~

13 ~~91. — Pursuant to California probate law, Mr. Sherlock's ownership of units in LERE became~~
14 ~~the property of the Sherlock Family.~~

15 ~~36. On or about April 4, 2016, the Balboa Property was sold by Harcourt, Sherlock never~~
16 ~~applied to have the Balboa Permit transferred to herself, nor did she provide information or execute~~
17 ~~documents for the required background check. The application bearing her signature was forged by~~
18 ~~Lake or at his direction, and Lake held himself out as her agent without any power of attorney or~~
19 ~~agency authority.~~

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

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

28

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

2 ~~92.—After Mr. Sherlock’s death, Harcourt sold the Balboa Property, on behalf of LERE, to~~
3 ~~High Sierra Equity, LLC (“High Sierra”), (a Lake wholly owned entity, for \$289,560.68.~~

4 ~~93.—On September 9, 2016, High Sierra), which then sold the propertyit to Razuki~~
5 ~~Investments, LLC (“Razuki Investments”) for \$375,000.00.~~

6 ~~94.—On March 1, 2017, Razuki Investments sold the property, and subsequently to San~~
7 ~~Diego United Holdings Group, LLC (“United Holdings”), (a Malan wholly owned entity.~~

8 ~~95.39. On May 21, 2021,). Ultimately, the Balboa Property was sold pursuant to court order~~
9 ~~sale of the Balboa Property, it was sold to to Allied Spectrum Inc. for \$3,280,000.00.~~

10 ~~96.—To summarize, without the required approval from a probate court appointed executor~~
11 ~~or other authorized individual, Harcourt sold the Balboa Property to Lake, who then sold it to Razuki,~~
12 ~~who then sold it to Malan, and it was then sold pursuant to a court ordered sale.~~

13 ~~97.40. At no point hasdid Harcourt explainedexplain how he could lawfully transfer the~~
14 ~~Balboa Property on behalf of LERE without going through probate court or withoutobtaining the~~
15 ~~consent of the Sherlock Family as his-heirs.~~

16 ~~**The Ramona Permit.**~~

17 ~~98.—On or about January 16, 2015, the town of Ramona in the County of San Diego granted~~
18 ~~Olive Tree Patients Association a cannabis permit for a dispensary at the Ramona Property.~~

19 ~~99.—Mr. Sherlock was the permittee on the Ramona Permit and the sole owner of Olive Tree~~
20 ~~Patients Association.~~

21 ~~100.—On or about January 13, 2015, the Ramona Permit was issued to Mr. Sherlock.~~

22 ~~101.—After the death of Mr. Sherlock, the Ramona Permit was transferred to Renny Bowden,~~
23 ~~a longtime friend of Lake.~~

24 ~~102.—The Ramona Permit is currently in the name of defendant Alexander.~~

25 ~~**Material discovery since the filing of this litigation.**~~

26 ~~103.—Subsequent to the filing of the operative complaint in this matter, Plaintiffs have~~
27 ~~discovered a great deal of additional evidence demonstrating criminal actions taken in furtherance of~~

1 ~~the conspiracy to defraud the Sherlock Family of the Sherlock Property.~~¹

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

6 ~~42. The Ramona Permit, after Mr. Sherlock’s death, was transferred to Bowden and then to~~
7 ~~Alexander, with Alexander admitting that Mrs. Sherlock is an owner and “owed money”.~~

8 **5. Value and Nature of the Property at Issue**

9 ~~43. Cannabis permits in San Diego County are personal property, valued at approximately~~
10 ~~\$7,000,000 each, and can generate substantial monthly revenue. The Balboa Dispensary, for~~
11 ~~example, was represented to generate up to \$100,000 on weekends.~~

12 ~~44. The motive behind Defendants’ actions is alleged to be the extraordinary profits~~
13 ~~generated by the dispensaries and the desire for financial gain.~~

14 **6. The “Strawman Practice” and Related Litigation**

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

20 ~~46. The courts have held that the “Strawman Practice” is not criminally illegal as a matter of~~
21 ~~law, but Plaintiffs dispute this position and reserve the right to amend the complaint should the~~
22 ~~ruling be reversed or vacated.~~

23 ~~47. Litigation over the Balboa Permit and Property has included allegations of fraud,~~
24 ~~misrepresentation, and even criminal conduct, such as Razuki’s attempt to hire an assassin to kill~~
25 ~~Malan during a dispute over ownership and profits.~~

26 _____
27 ¹ Plaintiffs note that additional information has been discovered, but such evidence demonstrates
28 additional criminal actions if the Strawman Practice is held to be criminal.

1 **A.7. Forensic Report regarding Mr. Sherlock's death. Evidence and**
2 **Admissions**

3 104.—On December 28, 2023, the Sherlock Family ~~was presented with~~ received a forensic
4 report ~~by Mr. from~~ Scott Roder (“Roder”),² owner of ~~the~~ Evidence-Room Forensic Reconstruction ~~(the~~
5 ~~“Forensic Report”)~~.

6 105.—The Forensic Report ~~analyzed,~~ analyzing the coroner’s report ~~of Mr. Sherlock that and~~
7 police investigation into Mr. Sherlock’s death. The report concluded that Mr. ~~Sherlock had committed~~
8 ~~suicide, which was based in part on the police report that in turn was based almost exclusively on~~
9 ~~Lake’s statements to the police that Mr. Sherlock was “in a funk.”~~

10 106.48. ~~The Forensic Report concludes that Mr. Sherlock’s death was “100% inconsistent~~
11 ~~with a self-inflicted GSW [i.e., gunshot wound] and suicide.”,~~ ” directly contradicting the official
12 cause of death.

13 107.—~~Mr. Sherlock did not commit suicide.~~

14 49. The ~~entire story by Lake~~ narrative that Mr. Sherlock was depressed ~~because he and~~
15 insolvent ~~was broke is a fabrication meant~~ fabricated by Lake to deceive the Sherlock Family and
16 ~~prevent them from knowing that~~ conceal the true value of the Sherlock Property, which was
17 subsequently transferred to Lake and Harcourt.

18 50. Defendant Alexander admitted to Plaintiffs’ attorney that Mrs. Sherlock is an owner of
19 the Ramona Permit and “owed money.” Alexander provided documents showing that Lake,
20 Alexander, and allegedly Mrs. Sherlock had retained the law firm of Miltner & Menck, but
21 Mrs. Sherlock never retained the firm, and her signature on conflict waivers and other documents
22 was forged by Lake.

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

25 **8. Summary of Defendants’ Conduct**

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

1 108.—~~Defendants conspired to effectuate the transfer of the Sherlock Property was worth over~~
2 ~~\$14,000,000, which Lakethrough forged documents, false representations, and Hareourt transferred to~~
3 ~~themselves.~~

4 109.—~~Again, Plaintiffs note that Razuki attempted to murder Malan for the exact same~~
5 ~~dispensary after the Balboa Property was acquired from Lake and the Balboa Permit from Hareourt.~~

6 ~~—The admissions by defendant Eulenthias Duane Alexander that Mrs. Sherlock is an~~
7 ~~owner of the Ramona Permit.~~

8 110.53. ~~On January 24, 2024, defendant Eulenthias Duane Alexander (“Alexander”) reached~~
9 ~~out to plaintiffs' attorney Andrew Flores and stated that he was aware of the claims byunlawful~~
10 ~~transactions, depriving the Sherlock Family of eriminal actions by defendants regarding the Sherlock~~
11 ~~Property, including the Ramona Permit that is ins Alexander’s nametheir rightful inheritance and~~
12 ~~causing substantial emotional and financial harm.~~

13 111.—~~On February 6, 2024, at Flores request, Alexander metPlaintiffs dispute all claims of~~
14 ~~past and current ownership by Defendants and other parties with a private investigator from Efrain~~
15 ~~Garcia, EG & Associates Investigations.~~

16 112.—~~During that meeting, Alexander provided Mr. Garcia documents and information that~~
17 ~~were compiled into a report.~~

18 113.—~~The report reflects that Alexander admits that Mrs.claims to the Sherlock is an owner~~
19 ~~of the Ramona Permit and that she is “owed money.”~~

20 114.—~~Alexander provided documents showing that numerous parties, including Lake,~~
21 ~~Alexander and allegedly Mrs. Sherlock had retained the law firm of Miltner & Menek, attorney~~
22 ~~William L. Miltner.~~

23 115.—~~At no point did Mrs. Sherlock retain the Miltner & Menek law firm or Miltner and the~~
24 ~~documentation provided shows that Miltner was operating under the impression that Lake would~~
25 ~~acquire Mrs. Sherlock’s signature for necessary documents, including a conflict of interest waiver.~~

26 116.—~~Lake forged Mrs. Sherlock’s signature on the conflict of interest waiver and other~~
27 ~~documents to make it appear to Miltner that they were lawfully representing her and that he was acting~~
28 ~~as her agent.~~

 117.—~~Lake has never had a power of attorney or any type of agency for Mrs. Sherlock.~~

1 ~~The Sherlock Family's efforts to reacquire their property via litigation.~~

2 118.—On April 3, 2020, the Sherlock Family filed suit in federal court seeking to recover the
3 Sherlock Property alleging that attorney Austin is at the center of a group of individuals who constitute
4 a criminal organization whose object is to acquire cannabis compliant real properties and permits with
5 the goal of creating a monopoly in the cannabis market in the County and City of San Diego.

6 119.—The Sherlock Family alleged that the biggest evidence of the alleged criminal
7 organization was Austin's aiding and abetting her clients to acquire cannabis permits in the name of
8 her client's agents or partners, i.e., strawmen, to acquire the permits. The strawmen falsely stated that
9 they were the sole owners without disclosing their agency and the ownership of their principals.
10 Principals who had previously had judgments entered against them in which they were fined for
11 operating illegal dispensaries—i.e., engaging in unauthorized commercial cannabis activity.

12 120.—The Courts have held that Austin's petitioning on behalf of her clients to own and profit
13 from the sale of cannabis in the name of a third party via the Strawman Practice, i.e., the actual owners
14 are not disclosed to licensing agencies, is not criminally illegal as a matter of law.

15 121.—Plaintiffs disagree with this position and will Property and seek leave to amend this
16 complaint once a declaration that ruling has been reversed or vacated.

17 122.—The presiding judge in this matter requested that Plaintiffs amend the complaint
18 complying with its holding that the Strawman Practice is not a criminal practice and that defendants
19 be dismissed to the extent that the causes all transfers of action against them are based on the Strawman
20 Practice as it is has been held to no be illegal.

21 123.—Counsel and Plaintiffs cannot voluntarily dismiss defendants when they believe that the
22 Strawman Practice is illegal. Plaintiffs will seek to amend this complaint at the point in time in which
23 the ruling holding the Strawman Practice is not criminally illegal is reversed.

24 ~~ADDITIONAL ALLEGATIONS AND CAUSES OF ACTION~~
25 ~~CONVERSION~~

26 (Plaintiffs against Defendants)

27 124.—Plaintiffs reallege and incorporate herein by reference the allegations in the preceding
28 paragraphs.

1 ~~125.54. The Sherlock Family had ownership~~Mr. Sherlock's interests in the Sherlock Property
2 ~~upon the death of Mr. Sherlock as his heirs are void.~~

3 **D. AfterLEGAL THEORIES AND CAUSES OF ACTION**

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

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

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

10 126.57. Defendants, including Lake and Harcourt, converted the Sherlock Property through
11 documents that contained Mr. to themselves and Mrs. Sherlock's third parties by means of forged
12 documents, including signatures of Mr. and Mrs. Sherlock, and without lawful authority or probate
13 proceedings.

14 127.58. All defendantsDefendants knew or should have known that Mr. Sherlock owned the
15 Sherlock Property ~~upon his death~~at the time of his death, and that any transfer of such property
16 required probate court approval or the consent of the Sherlock Family as heirs.

17 128.59. 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 ~~129.—Alexander is the current owner of the Ramona Permit.~~

21 ~~130.—The Sherlock Property was required by law to go through probate, and it became the~~
22 ~~property of the Sherlock Family upon his death.~~

23 ~~131.60. Consequently,~~all sales or transfers of the Sherlock Property after ~~the~~Mr. Sherlock's
24 ~~death of Mr. Sherlock~~ are void ~~and the Sherlock Property must be returned to the Sherlock Family ab~~
25 initio.

26 ~~132.—The Sherlock Family is entitled to have their property returned to them.~~

27 **CIVIL CONSPIRACY**

28 61. (Plaintiffs againstPlaintiffs are entitled to the return of the Sherlock Property and
damages for its conversion.

1 **Second Cause of Action Civil Conspiracy Against all Defendants)**

2 ~~133.62.~~ Plaintiffs reallege and incorporate herein by reference the allegations in the
3 preceding paragraphs as though fully set forth herein.

4 ~~134.63.~~ Defendants Lake and Harcourt, acting in concert and with the aid of other
5 Defendants, used forged documents ~~to and false representations to~~ defraud the Sherlock Family of
6 their ownership ~~interest~~interests in the Sherlock Property after ~~the~~Mr. Sherlock's death ~~of Mr.~~
7 ~~Sherlock.~~

8 ~~135.64.~~ Lake made false ~~representations~~statements to Mrs. Sherlock regarding the value and
9 ownership of the Sherlock Property, intending to prevent her from ~~knowing about the Sherlock~~
10 ~~Property and their value to prevent the Sherlock Family from seeking their~~her inheritance. ~~and to~~
11 facilitate the unlawful transfer of assets.

12 ~~136.~~—Mrs. Sherlock ~~trusted and~~relied on Lake's representations ~~as he is her brother in law~~
13 ~~and was Mr. Sherlock's~~ due to his familial relationship and business partner.

14 ~~137.65.~~ ~~Mrs.~~partnership with Mr. Sherlock. She also trusted Harcourt to ~~not violate~~honor his
15 fiduciary duties as ~~the~~Managing ~~member~~Member of LERE.

16 ~~138.~~—Harcourt ~~violated~~breached his fiduciary duties to the estate of Mr. Sherlock and the
17 Sherlock Family ~~as Mr. Sherlock's heirs.~~

18 ~~139.66.~~ ~~All defendants knew that~~by participating in the ~~Sherlock~~unlawful transfer of the
19 ~~Balboa~~ Property ~~was the Property of Mr. Sherlock.~~ and associated permits.

20 ~~140.67.~~ All ~~defendants~~Defendants knew, or should have known, that ~~after Mr. Sherlock's~~
21 ~~death,~~ the Sherlock Property belonged to Mr. Sherlock and, upon his death, to the Sherlock Family,
22 and that any transfer ~~of ownership of the Sherlock Property would have~~ required ~~an authorized~~
23 ~~representative of a probate court or the Sherlock Family.~~ authorization.

24 ~~141.68.~~ Harcourt's repeated refusal to explain how he lawfully transferred the Balboa
25 Property on behalf of LERE, without the ~~Sherlock Family's~~consent of the Sherlock Family or
26 ~~without the needed probate~~ authority ~~required by probate proceedings, evidence, evidences~~ his
27 knowing ~~unlawful role~~participation in ~~defrauding the Sherlock Family of the Sherlock~~
28 ~~Property~~conspiracy.

1 ~~b) 2. For compensatory~~Compensatory, general, consequential, and incidental damages
2 ~~and, together with~~ prejudgment interest, in an amount to be proven at trial, as permitted by law.

3 ~~c) 3.~~ An award of statutory damages, as permitted by law.

4 ~~d) 4.~~ An award of punitive and exemplary damages, as permitted by law.

5 ~~e) 5.~~ Reasonable ~~attorneys'~~attorney fees and costs, as permitted by law.

6 ~~f) 6. For a~~A temporary restraining order, preliminary injunction, and permanent
7 injunction enjoining the transfer of the Sherlock Property.

8 ~~g) 7. Declaratory relief that all transfers of Mr. Sherlock's interests in the Sherlock~~
9 ~~Property after his death are void and that the Sherlock Family is the rightful owner of the property.~~

10 ~~h) 8.~~ Any such other and further relief as the Court deems fair, equitable, and just.

11

12 DATED: January 30, 2026

KELLEY | CLARKE, PC

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By: _____
Matthew M. Clarke

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Attorneys for AMY SHERLOCK, an individual, and
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

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF SAN DIEGO**

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

7 **SEE ATTACHED SERVICE LIST**

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

15 **BY FACSIMILE:** The document(s) were served by facsimile. The facsimile transmission
16 was without error and completed prior to 5:00 p.m. A copy of the transmission report is
17 available upon request.

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

23 **BY E-MAIL OR ELECTRONIC TRANSMISSION:** Based on a court order or an
24 agreement of the parties to accept service by e-mail or electronic transmission, I caused the
25 documents to be sent to the persons at the e-mail addresses listed above. I did not receive,
26 within a reasonable time after the transmission, any electronic message or other indication
27 that the transmission was unsuccessful.

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

DATED: June 26, 2025

By _____

Andrew Flores

Attorney for Plaintiffs

AMY SHERLOCK, T.S. and S.S. (State) I declare under penalty of perjury under the laws
of the State of California that the foregoing is true and correct.

(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.

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Executed on September 2025, at Prosper, Texas.

Matthew Clarke

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

3 I am employed in the County of Collin, State of Texas. I am over the age of 18 years and not
4 a party to this action. My business address is 603 E. Broadway Street, Prosper, Texas 75078. On
5 February 5, 2026, I served the foregoing document described as **NOTICE OF CONTINUED
6 MOTION AND AMENDED MOTION FOR LEAVE TO FILE FIRST AMENDED
7 COMPLAINT; MEMORANDUM OF POINTS AND AUTHORITIES; DECLARATION OF
8 MATTHEW CLARKE; [PROPOSED] ORDER** on the interested parties in this action:

9 **SEE ATTACHED SERVICE LIST**

- 10 **BY U.S. POSTAL SERVICE:** This document was served by United States mail. I enclosed
11 the document in a sealed envelope or package addressed to the person(s) at the address(es)
12 above and placed the envelope(s) for collection and mailing, following our ordinary business
13 practices. I am readily familiar with this firm's practice of collecting and processing
14 correspondence for mailing. On the same day that correspondence is placed for collection
15 and mailing, it is deposited in the ordinary course of business with the United States Postal
16 Service at Highland Village, Texas, in a sealed envelope with postage fully paid.
- 17 **BY FACSIMILE:** The document(s) were served by facsimile. The facsimile transmission
18 was without error and completed prior to 5:00 p.m. A copy of the transmission report is
19 available upon request.
- 20 **BY OVERNIGHT DELIVERY:** The document(s) were served by overnight delivery via
21 FedEx. I enclosed the document in a sealed envelope or package addressed to the person(s)
22 and the address(es) above and placed the envelope(s) for pick-up by FedEx. I am readily
23 familiar with the firm's practice of collection and processing correspondence on the same day
24 with this courier service, for overnight delivery.
- 25 **BY E-MAIL OR ELECTRONIC TRANSMISSION:** Based on a court order or an
26 agreement of the parties to accept service by e-mail or electronic transmission, I caused the
27 documents to be sent to the persons at the e-mail addresses listed above. I did not receive,
28 within a reasonable time after the transmission, any electronic message or other indication
that the transmission was unsuccessful.
- BY HAND DELIVERY:** The document(s) were delivered by hand during the normal course
of business, during regular business hours.
- (State) I declare under penalty of perjury under the laws of the State of California that the
foregoing is true and correct.
- (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.

Executed on February 5, 2026, at Prosper, Texas.

27 
28 Matthew Clarke

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SERVICE LIST

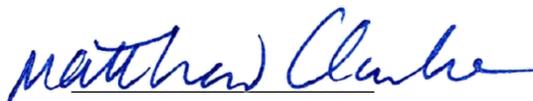
For service by email, I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on February 5, 2026, at Prosper, Texas.

Email Only
Andrew Hall
andrew@blakelawca.com
Steven Blake
steven@blakelawca.com
Attorneys for Steven Lake

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

Via FedEx - Tracking: 8885 2077 5058
EULENTIAS ALEXANDER
1210 Olive Street
Ramona CA 92065
Defendant Pro se


Matthew Clarke