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ANDREW FLORES (State Bar Number 272958)  
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**ELECTRONICALLY FILED**  
Superior Court of California,  
County of San Diego  
**12/22/2021** at 08:27:00 PM  
Clerk of the Superior Court  
By Kristin Sorianosos, Deputy Clerk

*Plaintiff in Propria Persona*  
and Attorney for Plaintiffs  
Amy Sherlock, Minors T.S.  
and S.S.

SUPRIOR COURT OF CALIFORNIA  
COUNTY OF SAN DIEGO, HALL OF JUSTICE

ANDREW FLORES, an individual, AMY  
SHERLOCK, on her own behalf and on behalf of  
her minor children, T.S. and S.S.

Plaintiffs,

vs.

GINA M. AUSTIN, an individual; AUSTIN  
LEGAL GROUP, a professional corporation,  
LARRY GERACI, an individual, REBECCA  
BERRY, an individual; JESSICA MCELFRISH, an  
individual; SALAM RAZUKI, an individual;  
NINUS MALAN, an individual; FINCH,  
THORTON, AND BARID, a limited liability  
partnership; ABHAY SCHWEITZER, an individual  
and dba TECHNE; JAMES (AKA JIM) BARTELL,  
an individual; NATALIE TRANG-MY NGUYEN,  
an individual, AARON MAGAGNA, an individual;  
BRADFORD HARCOURT, an individual; SHAWN  
MILLER, an individual; LOGAN  
STELLMACHER, an individual; EULENTHIAS  
DUANE ALEXANDER, an individual; STEPHEN  
LAKE, and individual, and DOES 1 through 50,  
inclusive,

Defendants.

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

DECLARATION OF PLAINTIFF AMY  
SHERLOCK IN SUPPORT OF EX  
PARTE APPLICATION FOR  
TEMPORARY RESTRAINING ORDER

1 I, AMY SHERLOCK, declare:

2 1. I am over the age of eighteen years, and a plaintiff in the above-entitled action.

3 2. The facts set forth herein are true and correct as of my own personal knowledge or belief.

4 3. I am the widow of Michael "Biker" Sherlock. Biker was a father, professional athlete,  
5 and an entrepreneur with interests in the cannabis sector.

6 4. I believe that in late 2013, Biker partnered with Stephen Lake and Bradford Harcourt for  
7 cannabis and real estate investments. Although I know they partnered, I was never told the details by  
8 Biker regarding the specific terms of their partnership.

9 5. Stephen Lake is my sister's husband.

10 6. Renny Bowden is a longtime friend and business associate of Lake.

11 7. Biker passed on December 3, 2015, purportedly he committed suicide.

12 8. At the time of his death, Biker and I were married with two children.

13 9. In 2015, Biker was granted two conditional use permits ("CUP") for cannabis operations,  
14 the Ramona<sup>1</sup> CUP and the Balboa CUP<sup>2</sup>.

15 10. Shortly after Biker's death, Lake told me that Biker had never actually acquired an  
16 interest in the Balboa CUP and that that Biker "blew it" because the Balboa Property did not qualify for  
17 a CUP. Lake told me that the homeowners association at the Balboa Property was taking legal action  
18 to prevent the operation of a dispensary and it had drained the finances of Biker, Lake and Harcourt so  
19 everyone had decided to "walk away" cutting their losses (the "HOA Litigation").

20 11. At various points in time after Biker's death, Lake told me that the facility operating  
21 under the Ramona CUP was not making any profits and that there were no distributions for the owners.

22 12. In January 2020, I was introduced to attorney Andrew Flores who told me he was  
23 working on case which may have ties to the Balboa CUP. He informed me that a form dissolving an  
24 entity, Leading Edge Real Estate, LLC ("LERE"), was supposedly executed by Biker and processed by  
25 the State three weeks after his death (the "Dissolution Form"). I reviewed the Dissolution Form, but I

26 \_\_\_\_\_  
27 <sup>1</sup> The "Ramona CUP" was issued at 1210 Olive Street, Ramona, CA 92065 (the "Ramona Property").

28 <sup>2</sup> The "Balboa CUP" means the conditional use permit issued by the City of San Diego at the 8863  
Balboa Avenue, Unit E, San Diego, California 92123 (the "Balboa Property").

1 did not recognize Biker's signature.

2 13. I discussed the issue with my sister, Lake's wife, and told her that I intended to sue  
3 Harcourt and she told me that I should speak with Lake about it. Lake then contacted me and asked to  
4 meet.

5 14. In early February 2020, I met with Lake at a coffee shop, and I told him that I intended  
6 to sue Harcourt. At this time, I only knew that the CUP had been transferred into Harcourt's name. Lake  
7 initially told me nothing other than "we did it," in which he was referring to the transfer of the Balboa  
8 CUP permit. He implied that my family would shun me for taking legal action against a family member  
9 and that I did not have the financial resources to be successful. The conversation was that of, oh well  
10 sorry, nothing you can do about it.

11 15. In mid-February 2020, Flores provided me a forensic handwriting expert report  
12 concluding that Biker's signature was probably forged on the Dissolution Form of LERE. Flores also  
13 informed me that the Ramona CUP had been transferred at some point to Harcourt and Bowden after  
14 review of Sherriff certificates and other publicly available documents. I thought I was still the owner of  
15 the Ramona CUP until this time.

16 16. On or around February 21, 2020, Flores, on my behalf, contacted Harcourt's attorney to  
17 inquire how it was that Harcourt obtained ownership interests in the Balboa and Ramona CUPs.

18 17. It was shortly thereafter, in early March of 2020, when Lake appeared at my house  
19 unannounced.

20 18. Between the early February of 2020 meeting with Lake and him appearing at my home,  
21 I had learned a lot more about the situation including dissolution of LERE. that the signature did not  
22 appear to me to be Biker's, and the handwriting expert had concluded that it was more than likely forged.

23 19. When I confronted Lake about it, he then said that he had seen Biker execute the  
24 Dissolution Form the day before he passed away and that he was in an extremely emotional state,  
25 severely depressed because he had to "sign away" the Balboa CUP, because of the allegedly expensive  
26 HOA Litigation, and that is why his signature on the Dissolution Form does not look like his normal  
27 signature. Lake said that this was the reason why Biker had committed suicide. Lake said that Biker had  
28 cost him a ton of money and he had papers for me to see if I wanted to. I declined. Lake repeatedly

1 attempted to convince me to not sue Harcourt.

2 20. I was shocked and outraged but kept calm and asked if I would be getting any proceeds  
3 related to the Balboa and Ramona CUPs as a result of Biker's investment of time and capital to acquire  
4 them. Lake responded that Biker's contributions were "worthless," that I and my children were not  
5 entitled to anything, and that I should be content with the proceeds from Biker's life insurance policy.

6 21. I was angry and responded that, among other things, it was impossible for Biker to have  
7 signed away millions of dollars of assets depriving me and his children of their value. As we argued I  
8 kept insisting that I would take legal action and Lake became clearly emotionally intense and he admitted  
9 that he and Harcourt were responsible for the transfer of the Balboa CUP. Lake said he was the property  
10 owner of the Balboa location and that he had conveyed the CUP to Harcourt. Lake said he did it "save"  
11 me from the "headaches" of having to deal with the permit. I told him I never gave permission for  
12 anyone to act on my behalf and that it was my right, duty and honor to tie up Biker's life and how angry  
13 I was that they'd denied me that. Lake then alleged that the Balboa CUP was "stolen" from Harcourt.

14 22. The conversation became an intense argument and Lake implied that I could not  
15 financially afford to take any legal action and that there was nothing I could do about what had taken  
16 place. Lake concluded the conversation by implying that if I took any legal action it would result in me,  
17 and my children being shunned by our family.

18 I declare under penalty of perjury according to the laws of the State of California that the  
19 foregoing is true and correct, and that this declaration was executed on December 17, 2021 at Prosper,  
20 Texas.

  
Amy Sherlock (Dec 17, 2021 16:18 CST)

21  
22 AMY SHERLOCK






# Sherlock Declaration Final Draft

Final Audit Report

2021-12-17

Created:	2021-12-17
By:	Andrew Flores (afloreslaw@gmail.com)
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## "Sherlock Declaration Final Draft" History

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