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ELECTRONICALLY FILED  
Superior Court of California,  
County of San Diego

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

8 Plaintiff in Propria Persona  
9 and Attorney for Plaintiffs  
10 Amy Sherlock, Minors T.S.  
11 and S.S.

12 SUPERIOR COURT OF CALIFORNIA  
13 COUNTY OF SAN DIEGO, CENTRAL DIVISION

14 AMY SHERLOCK, an individual and on behalf of  
15 her minor children, T.S. and S.S., ANDREW  
16 FLORES, an individual;

17 Plaintiffs,

18 v.

19 GINA M. AUSTIN, an individual; AUSTIN  
20 LEGALGROUP, a professional corporation,  
21 LARRY GERACI, an individual, REBECCA  
22 BERRY, an individual; JESSICA MCELFRISH,  
23 an individual; SALAM RAZUKI, an individual;  
24 NINUS MALAN, an individual; FINCH,  
25 THORTON, AND BAIRD, a limited liability  
26 partnership; ABHAY SCHWEITZER, an individual  
27 and dba TECHNE; JAMES (AKA JIM) BARTELL,  
28 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, an individual, ALLIED SPECTRUM, INC.,  
a California corporation, PRODIGIOUS  
COLLECTIVES, LLC, a limited liability company,  
and DOES 1 through 50, inclusive,

Defendants.

Case No.: 37-2021-0050889-CU-AT-CTL

AFFIDAVIT OF ANDREW FLORES IN  
SUPPORT OF PLAINTIFFS' RESPONSE TO  
ORDER TO SHOW CAUSE WHY  
DEFENDANT BRADFORD HARCOURT  
SHOULD BE SERVED VIA PUBLICATION;  
AND FOR ORDER OF INVOLUNTARY  
DISMISSAL OF DEFENDANTS THE COURT  
DEEMS NECCESARY

Hearing Date:

Hearing Time:

Judge: Mangione

Courtroom: 75

Related Cases:

37-2014-00009664

37-2014-0020897

37-2015-00004430

37-2017-00010073

37-2022-00000023

1 I, Andrew Flores, attest as follows:

- 2 1. I am over the age of eighteen years old and was, during the events described herein, a resident of the  
3 County of San Diego, California.
- 4 2. The facts set forth are true and correct as of my own personal knowledge or belief.
- 5 3. Plaintiffs in this action have brought forth suit against defendants alleging that they have conspired  
6 and succeeded in profiting from illegal commercial cannabis activity – drug trafficking – in the  
7 cannabis market in the County and City of San Diego with the goal of creating a monopoly (the  
8 “Antitrust Conspiracy”).
- 9 4. Plaintiffs allege that defendants have effectuated the Antitrust Conspiracy through sham petitioning  
10 to government cannabis licensing agencies and the judiciary.
- 11 5. Lawrence Geraci and Salam Razuki had judgments entered against them and sanctioned for operating  
12 illegal dispensaries and were prohibited by law from being licensed from lawful commercial cannabis  
13 activities.
- 14 6. Geraci and Razuki engaged the legal services of attorney Gina M. Austin of the Austin Legal Group  
15 (“ALG”).
- 16 7. Ausitn aided Geraci and Razuki by petitioning on their behalf for them to acquire the required  
17 cannabis permit and licenses in the name of third parties/strawmen (the “Strawman Practice”).
- 18 8. Plaintiffs allege that during the course of effectuating the Antitrust Conspiracy defendants have  
19 engaged in criminal activities that include forging documents, sham petitioning to the judiciaries,  
20 witness intimidation and tampering.
- 21 9. However, to date, the origin of Plaintiffs allegations, that object of defendants is to profit from the  
22 illegal sale of cannabis by parties who cannot lawfully profit from the sale of cannabis because they  
23 are barred by law, which is why they undertook the Strawman Practice, have been held to be legally  
24 invalid claims.
- 25 10. In other words, the Courts, including this one, have directly and indirectly held that parties can sell  
26 cannabis in the name of third parties.
- 27 11. It is in excess of all Courts’ jurisdiction to enforce, validate, condone or allow criminal activity.  
28 Consequently, all such decisions, and judgments in related cases are void.

- 1 12. Plaintiffs allege that defendants pursuant to the Antitrust Conspiracy defrauded Plaintiff Amy  
2 Sherlock and her children, T.S. and S.S. (the “Sherlock Family”) of two cannabis permits to operate  
3 cannabis dispensaries.
- 4 13. Plaintiffs also allege defendants defrauded Plaintiff Andrew Flores, as Darryl Cotton’s successor-in-  
5 interest, of a cannabis CUP.
- 6 14. In this case, the Court has ordered the dismissal of defendants pursuant to which Plaintiffs have no  
7 causes of action against based on the premise that the Strawman Practice is lawful. However, pro se  
8 plaintiff and counsel for co-plaintiffs in this matter, Andrew Flores, cannot legally, ethically or  
9 morally cannot dismiss any defendants based upon a void order.
- 10 15. I have done extensive research and consultations, including with the State Bar of California, and my  
11 professional obligations mandate without any exception that in my advocacy of my clients that I  
12 continue to argue that the Strawman Practice is criminally illegal and that the judgments and decisions  
13 holding that defendants can lawfully sell cannabis in the name of someone else via the Strawman  
14 Practice are void.
- 15 16. If I comply with this Court’s order to dismiss defendants then Plaintiffs causes of action will not  
16 automatically toll or waive the statute of limitations for their causes of action. This means that if  
17 plaintiffs bring forth their causes of action again against the same defendants once the Courts hold  
18 that you can’t sell cannabis in someone else’s name – i.e., the Strawman Practice is criminally illegal  
19 - the statute of limitations will have expired in the interim.
- 20 17. It is my belief based on years of work on this case that I cannot ethically comply with the Court’s  
21 order without permanently prejudicing my co-plaintiffs and violating my professional obligations to  
22 my co-plaintiffs.
- 23 18. Plaintiffs have repeatedly sought for years to service Harcourt with the complaint in this action by  
24 going to the only known address for him in Montebello, California as set forth and detailed in the  
25 request for publication.
- 26 19. Attached hereto as Exhibit A is a true and correct copy of the complaint in *San Diego Patients*  
27 *Cooperative Corporation, Inc., et al, vs. Razuki Investments, L.L.C., et al.*, San Diego Superior Court,  
28 Case No. 37-2017-00020661.

1 20. Attached hereto as Exhibit B is a true and correct copy of Judge James Mangione's order dated August  
2 19, 2022 on defendant Stephen Lake's demurrer.

3 21. Attached hereto as Exhibit C is a true and correct copy of the decision rendered by the Court of  
4 Appeal, Fourth Appellate District, Case No. D081109.

5 I attest under penalty of perjury according to the laws of the State of California, that the statements  
6 made herein are true and correct.

7  
8 DATED: February 6, 2025

9  
10  
11 By:  \_\_\_\_\_  
12 Andrew Flores