

# AI ANALYSIS SHERLOCK STEERING DOCUMENT

## THE KEY ISSUES

Here are some of the most critical points, organized by severity and potential implications:

### Core Legal & Regulatory Issues:

#### 1. Regulatory Violations

- Alleged failure to disclose >20% ownership interest to licensing authorities
- Potential violation of BCC Title 16 Section 5003
- Questions about proper non-profit compliance in cannabis operations

#### 2. Property Rights & Authorization

- Suspected unauthorized transfer of CUP (Conditional Use Permit) rights
- Multiple transfers of rights potentially without proper owner consent
- Complex chain of transfers involving Harcourt and Ninus Malan

#### 3. Document Authenticity

- Alleged forgery of Amy Sherlock's signature on Conflict of Interest Waiver (May 5, 2017)
- Suspicious email attributed to Biker Sherlock
- Significant gaps in critical business documentation

### Criminal Investigation Elements:

#### 1. Death Investigation Concerns

- Unreported threats from Adam Knopf prior to Biker Sherlock's death
- Potential withholding of relevant information from death investigation
- Introduction of questionable medical expert (Dr. Cooper) to promote specific death narrative

#### 2. Financial Irregularities

- Missing \$114,000 payment
- Connection to \$542,727.06 tax assessment
- Potential "pay-to-play" activities with city officials

#### 3. Misrepresentation

- Contradictory statements about cannabis industry involvement
- False claims of being "just a landlord" despite extensive operational involvement
- Documented participation in business operations and revenue discussions

### Primary Business Ethics Violations:

#### 1. Fiduciary Responsibility

- Apparent failure to protect beneficiary interests
- Questionable handling of business arrangements post-death
- Potential breach of trust responsibilities

### Severe Criminal Exposure:

#### 1. Direct Criminal Allegations

- Active police investigation (case #24-030740) with reported non-cooperation
- Multiple forgery allegations involving three entities (LERE, FCMC, FCE)
- Association with violent criminal activities (Razuki's federal charges for attempted murder of Malan)

## **2. Financial/Insurance Fraud**

- Alleged intentional misrepresentation to insurance companies (skateboard vs. cannabis business)
- Potential securities violations in private placement memorandums
- Issues with investor disclosures and structured investment vehicles

## **3. Cannabis Operations Irregularities**

- Involvement in allegedly illegal dispensary takeovers
- Violations of court orders regarding dispensary operations
- Connection to unauthorized removal of product/cash during receiver takeover

## **Business Structure & Documentation Issues:**

### **1. Ownership & Control Problems**

- Inconsistencies in ownership percentages across entities (FCE, LERE)
- Unclear or misrepresented business roles, especially regarding Biker's position
- Exclusion of business partners from key decisions

### **2. Documentation Discrepancies**

- Inconsistent loan terms (two-week bridge loan with varying conditions)
- Conflicting default timing (September 9, 2015 vs. two weeks)
- Varying interest rates and payment terms in different communications

### **Post-Death Business Conduct:**

#### **1. Suspicious Timeline**

- Questionable decisions and communications immediately before Biker's death
- Unauthorized modifications to business arrangements after death
- Concerns about access and use of deceased partner's email accounts

#### **2. Estate Issues**

- Actions potentially harmful to transfer of business interests to Biker's family
- Questions about proper handling of deceased partner's business assets

## **Pages 1 - 19**

### **1. Undisclosed Ownership Interest:**

There are questions about whether Lake properly disclosed his ownership interest (>20%) to licensing authorities as required by BCC Title 16 Section 5003. This could constitute regulatory violations.

## **2. Potential Wrongful Transfer of CUP Rights:**

The document suggests Lake may have been involved in transferring CUP (Conditional Use Permit) rights that belonged to Biker Sherlock's widow (Amy) without her knowledge or consent, potentially through multiple transfers - first to Harcourt, then to Ninus Malan.

## **3. Forged Documents:**

There's an allegation of Amy Sherlock's signature being forged on a May 5, 2017 Conflict of Interest Waiver document that Lake and partners also signed.

## **4. Death Investigation Implications:**

The document reveals that Lake received threatening phone calls from Adam Knopf shortly before Biker Sherlock's death (ruled as self-inflicted), but apparently did not report this to police during the death investigation. This could raise questions about withholding relevant information.

## **5. Non-Profit Compliance Issues:**

Questions are raised about whether the cannabis operations were properly run as non-profits as required by law at the time.

## **6. Documentation Gaps:**

There appear to be missing or incomplete documentation regarding:

- The 6-month note mentioned in communications
- Partnership agreements and ownership structures
- Legal counsel engagement records
- Communications about post-death business arrangements

## **7. Fiduciary Duty Questions:**

The document suggests Lake and partners may have failed to protect Amy Sherlock's interests as a beneficiary after Biker's death, potentially breaching fiduciary duties.

## **8. Regulatory Compliance:**

The series of CUP transfers and business structure changes after Biker's death raise questions about compliance with cannabis licensing requirements and proper disclosures to authorities.

## **9. Death Investigation & Violence:**

- The document reveals a pattern of violent threats from Adam Knopf, including threats to Steve Lake himself
- Lake apparently didn't report these threats to police during investigation of Biker Sherlock's death, which was ruled a suicide
- There are questions about a suspicious email supposedly from Biker thanking Lake for being "generous" that "doesn't appear to be created by Biker"
- Lake brought a questionable "expert" (Dr. Cooper, who lost his medical license) to visit Biker's widow to promote a CTE explanation for the death

## **10. False Statements:**

- Lake appears to have made contradictory statements about his involvement in the cannabis industry
- He claimed to be "just a landlord" but was involved in:
  - Discussing cannabis wholesale prices (\$2,000/lb)
  - Having cannabis financial projections on his computer
  - Being included in operating agreements for cannabis businesses
  - Participating in revenue discussions and partnership structures

#### **11. Financial/Legal Issues:**

- Questions about a missing \$114,000 payment and disputed "management contract" with Knopf
- Involvement in potentially illegal non-profit/for-profit structure violations
- Connection to Knopf's unpaid \$542,727.06 tax assessment
- Possible involvement in "pay-to-play" activities with city officials regarding cannabis permits

#### **12. Documentation Concerns:**

- Multiple missing or disputed contracts and agreements
- Questions about wire transfers and property purchases
- Involvement in complex property deals with unclear ownership structures
- Creation of new business entities (like Olive Street Finance, LLC) that may be related to these dealings

#### **13. Criminal Exposure:**

- Connection to individuals involved in serious crimes (Razuki was charged federally for attempting to have Malan murdered)
- Possible involvement in illegal dispensary takeovers
- Potential participation in court order violations regarding dispensary operations
- Association with individuals accused of removing product and cash during receiver takeover

#### **14. Questionable Business Structure and Transparency:**

- There appear to be discrepancies regarding ownership percentages and business structures between different entities (FCE, LERE, etc.)
- Biker's role and compensation seems to have been unclear or potentially misrepresented, especially in the Private Placement Memorandum (PPM)
- There are questions about proper disclosure and documentation of loan terms

#### **15. Potential Fiduciary Duty Issues:**

- The document questions whether fiduciary duties were properly maintained, especially regarding Biker's position and control over company finances
- There appear to be communications excluding certain business partners from key decisions

#### **16. Loan Documentation Concerns:**

- There are inconsistencies regarding a loan characterized as a "two-week bridge loan" that appears to have different terms in various documents
- Questions about default timing and terms (September 9, 2015 vs. two weeks)
- Interest rate and payment terms appear to have changed in different communications

#### **17. Death of Business Partner ("Biker"):**

- There are questions about decisions and communications made just prior to Biker's death
- Concerns about business arrangements and PPM modifications after Biker's death
- Questions about access to Biker's email accounts and communications

#### **18. Potential Criminal Concerns:**

- There's mention of threatening behavior by Knopf that wasn't reported to police
- Questions about property dealings and cannabis business involvement

#### **19. Potential Fraud and Forgery:**

- There are allegations of multiple forged signatures after Biker's death on three separate entities (LERE, FCMC, and FCE)
- There's an active police investigation (case no. 24-030740) that Lake is reportedly not cooperating with

#### **20. Insurance Fraud:**

- Evidence suggests intentional misrepresentation to insurance companies about the nature of the business (claiming it was a skateboard business rather than cannabis operation)
- This could constitute insurance fraud

#### **21. Securities Violations:**

- Questions about proper disclosure and documentation in private placement memorandums
- Potential misrepresentation to investors
- Issues with structured investment vehicles and ownership percentages

#### **22. Criminal Investigation:**

- Lake's refusal to cooperate with Detective Mills in the financial crimes investigation could exacerbate his legal exposure
- The forgery allegations alone could result in criminal charges

#### **23. Fiduciary Duty Breaches:**

- Evidence suggests Lake may have acted against business partners' interests
- Particularly concerning are actions taken after Biker's death regarding business interests that should have transferred to Biker's family

#### **24. Cannabis License/Permit Issues:**

- Potential misrepresentations to regulatory authorities
- Questions about proper disclosure and compliance with local cannabis regulations

## **Pages 20 - 30**

#### **1. Major Insurance Issue:**

There appears to be a significant problem regarding misrepresentation of the business type to Mercury Insurance. Bowden (acting on behalf of the party) told Gyben that it was a

"skateboard business" and "startup," explicitly stating they were "not insuring the biz only property and general liability."

## **2. Potential Misrepresentation:**

This is problematic because:

- General liability insurance rates are heavily influenced by the type of business being operated
- The business was actually a cannabis business with armed guards, not a skateboard business
- Had Mercury known the true nature of the business, they might not have issued the policy
- There's a question of whether Bowden was authorized to misrepresent the business nature

## **3. Communication Issues:**

- The email exchanges about insurance occurred between RCIS and Bowden
- The subject party was notably excluded from these email exchanges
- On November 23, 2015, Bowden simply sent an email stating "Here is the insurance"

## **4. Financial Payments:**

- Knopf made significant payments to multiple parties in 2014:
  - \* Bartell: \$30,000
  - \* Biker: \$27,500
  - \* Murphy: \$2,000
  - \* Austin: \$18,000

## **5. Question of Potential Harm:**

- There's a query about whether Knopf ever expressed dissatisfaction about his return on investment to the point where it might have suggested he would harm Biker
- Reference is made to a previous "Knopf threat to Lake" (mentioned in A18)

## **6. Additional Context:**

- Tiffany Knopf has alleged that Bartell received weekly cash payments of \$10,000-\$20,000, often with Austin present
- These payments were allegedly meant to bribe City officials for preferential treatment in cannabis licenses
- All parties were "directly engaged in shared licensing interests"

## **7. Key Concern:**

The text appears to be questioning whether there were warning signs about potential threats to Biker's safety based on Knopf's financial investments and possible dissatisfaction with returns, and whether appropriate warnings were given about any increased threat risk.

# **Pages 31- 40**

## **1. Ownership and Leadership Changes:**

- PH-3069 (Prime Harvest, Inc):
  - \* Established November 2022 with Shaun Chamberlin as agent

\* Chamberlin served as CEO/CFO/Secretary through April 2024

## **2. Business Dispute:**

- In 2022, Chamberlin challenged Alexander regarding the Gateway Outlet Cannabis CUP
- The challenge was based on Alexander letting his license lapse
- There's a question about whether the person had any interest in any Prime Harvest entity through either Alexander or Chamberlin

## **3. Related Entities:**

- Prime Harvest D9, LLC (PH-0964):
  - \* Established May 2022
  - \* Eulenthias D. Alexander listed as member and agent
  - \* Operating from 1210 Olive Street, Ramona address
- Prime Harvest, LLC (PH-0287):
  - \* Nevada entity established May 2016
  - \* Registered in California as foreign LLC in December 2017
  - \* Eulenthias D. Alexander as agent

## **4. Key Questions:**

- Whether there were any business relationships between the addressed party, their partners, or related business entities with:
  - \* Alexander's PH-0964 entity
  - \* Alexander's PH-0287 entity
- Documentation requested for any such relationships

## **5. Improper Transfer of Business Interests:**

- Instead of transferring Biker's interests to his widow (Amy Sherlock), the parties appear to have created a new LLC (SDPCC-4398) and terminated the original LLC (UPCC-7892) where Biker held interests
- This could potentially constitute a breach of fiduciary duty and violation of widow's inheritance rights

## **6. Lack of Proper Communication and Transparency:**

- Amy Sherlock was consistently left off email communications about transfers affecting her interests
- Critical meetings and decisions were made without her knowledge or input
- Documentation requirements appeared to shift without proper legal basis

## **7. Questionable Legal Representation:**

- Attorney John J. Murphy appears to have been involved while having a personal relationship with the widow
- Potential conflict of interest in representing multiple parties' interests
- Questions about proper legal guidance during the transfer process

## **8. Suspicious Business Restructuring:**

- References to removing "baggage" and creating "fresh starts" suggest possible intentional circumvention of widow's rights

- Multiple business entities were created/dissolved in what could be viewed as an attempt to obscure assets

### **9. City Administrative Issues:**

- Inconsistent requirements for transfer documentation
- Questions about background check processes
- Irregular handling of refund checks
- Simultaneous transfer of CUP to both the widow and Harcourt under different project numbers

These actions could potentially give rise to several causes of action including:

- Breach of fiduciary duty
- Fraud
- Conversion of business interests
- Violation of inheritance rights
- Professional malpractice (regarding legal representation)
- Conspiracy to deprive beneficial interest

## **PAGES 41 - 48**

Based on these additional details, there appear to be several serious legal issues that compound the concerns from the previous pages. Here are the key legal ramifications:

### **1. Fraudulent Business Practices:**

- Creation of parallel project numbers (467963 and 368347) for the same CUP transfer
- Apparent manipulation of business entities to divert assets away from rightful beneficiary
- Potential mishandling of refund checks and financial assets

### **Potential Criminal Conduct:**

- Suspicious timing and handling of Biker's death labeled as suicide
- Immediate business restructuring after death
- Unauthorized takeover of personal property (mailbox)
- Potential fraud in County/City documentation
- Pattern suggesting premeditated business takeover

### **Document/Permit Fraud:**

- Unauthorized use of Biker's name on permits
- False representations to government agencies
- Improper addresses used on official documents
- Misrepresentation of ownership and control
- Questionable property transfers and deed manipulations

### **2. Corporate Malfeasance:**

- Undisclosed 50% ownership interest in the Olive Tree (Ramona) entities
- No documentation of ownership interest divestiture



- Contradictory statements about Biker's interests in Ramona property
- Improper handling of business entity transitions after death

**Financial Improprieties:**

- Unclear accounting practices
- Questionable rent payments and "unwritten agreements"
- Suspicious handling of trust accounts
- Unexplained financial transactions
- Possible tax evasion/improper reporting

**3. Fiduciary Duty Violations:**

- Failure to inform beneficiary (widow) of her interests
- Deliberate exclusion from critical business communications
- Unauthorized business restructuring without beneficiary consent
- Potential self-dealing in transfer of assets

**4. Professional Ethics/Legal Malpractice:**

- Potential conflicts of interest with attorney Gina Austin representing multiple parties
- Questionable legal representation regarding entity status (UPCC-7892)
- Failure to protect widow's interests in business transitions

**Business Ethics/Corporate Fraud:**

- Immediate pursuit of business opportunities after death
- Exclusion of widow from communications
- Secret negotiations with multiple parties
- Misrepresentation of business ownership/control
- Improper corporate restructuring

**5. Regulatory/Administrative Violations:**

- Inconsistent documentation with City/County authorities
- Questions about validity of background checks
- Improper financial responsibility party transitions
- Potential misrepresentation on government forms

**6. Conspiracy:**

- Evidence of coordinated efforts to restructure business without beneficiary knowledge
- Communications suggesting intentional exclusion of widow from decisions
- Pattern of behavior indicating organized effort to divert business interests
- Pattern of deceptive communications
- Intentional exclusion of widow from decisions
- Strategic timing of business moves
- Evidence of premeditated plans

**These actions could potentially give rise to criminal charges as well as civil causes of action including:**

- Wire fraud
- Corporate fraud

- Breach of fiduciary duty
- Professional malpractice
- Conversion
- Civil conspiracy
- Fraudulent transfer of assets

This could potentially lead to:

- Criminal RICO charges
- Securities fraud investigations
- Tax evasion charges
- Wire/mail fraud charges
- Multiple civil causes of action
- Professional license revocations

## **PAGES 49 - 51- The conclusion**

This conclusion section and the preceding questions reveal an extremely troubling pattern that could constitute serious criminal enterprise activity.

### **1. Timing and Suspicious Death:**

- Business communications occurring simultaneously with discovery of Biker's body
- Immediate business pursuits on day of death
- Pattern suggesting potential premeditated actions
- "Vulture capitalists" appearing immediately after death

### **2. Sophisticated Criminal Enterprise Indicators:**

- Complex web of shell companies
- Deliberate identity concealment
- Strategic timing of business restructuring
- Coordinated efforts among multiple parties
- Pattern of document manipulation

### **3. Financial Crimes:**

- Unpaid tax liabilities
- Non-compliance with GAAP
- Shell company financial manipulations
- Banking relationship concerns
- Potential money laundering structure

### **4. Public Corruption Elements:**

- Government "pay-to-play" allegations
- Manipulation of licensing processes
- Improper influence over government employees
- Questionable legal representations
- Corruption of administrative processes

### **5. Evidence of Premeditation:**

- Strategic entity creation
- Coordinated timing of actions
- Deliberate exclusion of rightful parties
- Complex concealment strategies
- Pattern of deceptive practices

**This case appears to contain elements that could warrant:**

- Federal RICO investigation
- State and federal criminal charges
- SEC investigation
- IRS criminal investigation
- Professional licensing board investigations
- Multiple civil actions

*The complexity and scope of the alleged scheme, combined with the timing around Biker's death, suggests this may be much more than just business impropriety - it could be evidence of organized criminal activity.*

**Steve Lake should be concerned because:**

1. The apparent misrepresentation to the insurance company could potentially void the policy
2. The exclusion from crucial email communications about the insurance coverage
3. The potential liability issues if something were to happen and the insurance company discovered the true nature of the business
4. Questions about whether proper coverage was obtained for the actual business operations

**Legal Consequences Could Include:**

1. Criminal charges for forgery and fraud
2. Civil litigation from Biker's estate
3. Regulatory actions regarding cannabis licenses
4. Insurance fraud penalties
5. Securities law violations
6. Personal liability for fiduciary duty breaches