

1 TREVOR HILL
2 7890 HAMILTON POOL DRIVE
3 LAS VEGAS, NV 89113
4 *In Pro Per*

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
CENTRAL JUSTICE CENTER

NOV 03 2021

DAVID H. YAMASAKI, Clerk of the Court

BY: _____ DEPUTY

9 **SUPERIOR COURT OF ORANGE COUNTY**

10 **CENTRAL JUSTICE CENTER**

11 TREVOR HILL,
12 Plaintiff,

13 vs.

14 NICHOLAS DELFRANCO, an individual;
15 TIFFANY REY aka TIFFANY RAY, an
16 individual,

17 Defendants

Case No.:

30-2021

01229381

COMPLAINT FOR:

Assigned for All Purposes

1) FRAUD

JUDGE THEODORE HOWARD

2) CONVERSION

18
19 Plaintiff complains and for causes of action alleges as follows:

20 **I. INTRODUCTION**

21 1. Hill brings this action as a result of Defendant, Nicholas Delfranco's ("Delfranco's")
22 fraudulent and unfair business practices. Delfranco has engaged in a pattern and practice of
23 purchasing products from Hill upon misrepresentations about when payment would be made
24 and future production profit share.

25
26 2. In addition, Delfranco has made numerous false promises to pay and then presented
27 a worthless check by knowingly writing a check upon an account without sufficient funds
28

1 to pay.

2 3. On or about August of 2019, Hill delivered 110 lbs of licensed CBD seed (“Farm
3 Supplies”) for Defendants to plant, farm, harvest, and sell, for which, Hill would receive
4 50% of the profits.
5

6 4. On November 24, 2019, Hill visited the farms only to find dead brush that was never
7 harvested. In addition, hardly any plants were in existence when compared to the total
8 number of seeds provided.

9 5. Delfranco makes only excuses that don’t add up to facts.

10 6. Defranco’s long time girlfriend and mother to his child, Tiffany Rey aka Tiffany Ray
11 (“Ray”) also is part of the scheme and helps move the money that Delfranco steals from his
12 victims.
13

14 7. Because there is no explanation as to how over \$825,000 in inventory has
15 disappeared, Hill has filed this complaint.
16

17 **II. PARTIES**

18 A) Defendant Nicholas Delfranco (“Delfranco”), is, and at all times herein mentioned was,
19 a resident in of the City of Irvine, County of Orange, State of California.

20 B) Plaintiff, Trevor Hill, is, and at all time herein mentioned is a resident of the City of Las
21 Vegas, County of Clark, State of Nevada.
22

23 **III. JURISDICTION**

24 8. Jurisdiction over Delfranco is proper under California Code of Civil Procedure §410.10.
25
26
27
28

1 9. This Court has general personal jurisdiction over Delfranco because he has had
2 substantial and continuous contacts with California, living in a residence located in Laguna
3 Beach, CA.

4 IV. FACTUAL ALLEGATIONS

5
6 10. On or about August of 2019, Plaintiff had the farm supplies delivered to
7 Delfranco with a promise by Defendant to pay for the merchandise in 10 days.

8
9 11. Delfranco, despite several demands, failed to make any payments whatsoever. In
10 fact, Defendant has had Plaintiff show up on numerous occasions, driving hundreds of miles
11 each time, to various places with a promise to pay all or part of the debt owed.

12 12. Plaintiff contacted Defendant addressing this concern, to which, Defendant
13 reassured, promised, and represented that there would be no problem with the check clearing.

14 13. Defendant's check was returned for Non-Sufficient Funds ("NSF") (Exhibit 2).

15
16 14. Plaintiff then drove to one of the farms over 1000 miles away on November 23rd
17 through the 25th because Defendant said harvest was happening soon.

18 15. Upon arrival, he found that only 70 acres had been planted for 1000 acres worth
19 of product.

20 16. When inquired about what happened to the rest of the product, there was no real
21 answer other than some of the product was available to be returned.

22
23 17. Plaintiff contacted the person, Chuck Parker, who was responsible for harvesting
24 to find out why it hasn't happened. The response was that Defendant hadn't paid him either.

