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MARIA LUISA TREVEJO and MLT WORLD, LLC  
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9 SUPERIOR COURT OF CALIFORNIA  
10 COUNTY OF LOS ANGELES  
11



12 MARIA LUISA TREVEJO, an individual; and  
MLT WORLD, LLC, a Limited Liability  
13 Company,

14 Plaintiffs,

15 v.

16 STEPHEN BELAFONTE, an individual; and  
DOES 1 through 50, inclusive,

17 Defendants.  
18

**CASE NO. 23STCV01046**

**COMPLAINT FOR:**

1. INTENTIONAL FRAUD
2. BREACH OF FIDUCIARY DUTY
3. CONVERSION
4. CONSPIRACY
5. AIDING AND ABETTING THEFT AND MISAPPROPRIATION
6. RETURN OF USURIOUS INTEREST
7. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

**JURY TRIAL DEMANDED**

1 Plaintiffs MARIA LUISA TREVEJO (professionally known as “Malu”) and MLT WORLD,  
2 LLC, by and through their counsel, allege on information and belief as follows:

3 **PRELIMINARY STATEMENT**

4 1. This lawsuit centers around the familiar tale of an unscrupulous male hoaxer preying  
5 on a young girl twenty-seven years his junior and, in domineering fashion, taking control of her  
6 life and income. As is often the case, the tools of control here included exploiting the plaintiff’s  
7 inexperience and vulnerability and grooming her to trust an older, purportedly “wiser” man.

8 2. The bad actor here is professional grifter Stephen Belafonte (“Belafonte”), who was  
9 born Stephen Stansbury. Belafonte is not related to the iconic actor Harry Belafonte. Rather, on  
10 information and belief, Stansbury changed his name to Belafonte to create the false impression that  
11 he is related to Harry Belafonte. He did so to acquire unearned cache and jumpstart his own social  
12 and career aspirations.

13 3. After more than twenty years coasting in the entertainment industry with little to  
14 show for it, Belafonte latched himself again to someone else’s fame – and this time money – when  
15 he married singer Melanie Brown, professionally known as Mel B (“Mel B”) of the UK-based pop  
16 group “The Spice Girls.” That easy money ended 10 years later, however, when Mel B filed for  
17 divorce and alleged that Belafonte physically and emotionally abused her. She accused Belafonte  
18 of choking and punching her. In April 2017, the Los Angeles Superior Court granted Mel B a  
19 restrainer order against Belafonte.

20 4. Following his high-profile fiasco, Belafonte retreated to the outskirts of the  
21 entertainment industry. But his refuge could not last indefinitely because he needed money, which  
22 meant that he needed to find another artist to support him. Young and inexperienced rising stars  
23 make the best targets for men like Belafonte, and eventually he set his sights on an unsuspecting,  
24 fragile minor, Plaintiff Maria Luisa Trevejo (“Maria”). Maria is popularly known in the  
25 entertainment industry and by her fans as “Malu.” Maria met Belafonte when she was 17 years old,  
26 and on the path to becoming a global music and social media sensation. Always the prospector,  
27 Belafonte knew a payday when he saw it, and he pounced on the opportunity to attach himself to  
28 Maria’s personal life and earnings.





1           5.       What made Maria an especially appealing quest for Belafonte was her youthful  
2 susceptibility, which fit easily with his congenital drive for manipulation and control. Maria was  
3 born in Cuba and raised in Spain and moved to Florida with her mother when she was 14 years old.  
4 She was bullied in the U.S. for “being different.” When Belafonte fixed on Maria, he recognized  
5 that her upbringing had deprived her of a formal education and that she did not understand contracts  
6 or finances. Maria’s relationship with her mother was frayed at the time, and Belafonte saw she  
7 had no one to protect her from financial predators and hangers-on who vicariously live through  
8 entertainers and steal their money. He knew she felt, and was, vulnerable.

9           6.       Plaintiffs are informed and believe Belafonte unscrupulously played on Maria’s  
10 youth, fear, and insecurity and used his older-man role to pose as her protector and gain her trust.  
11 Maria believed Belafonte’s promises of truthfulness and protection, and unsuspectingly placed him  
12 at the head of her inner circle. Once installed in this position, Belafonte wrongfully seized control  
13 of her personal life, business, and the people around her. To maintain control, Belafonte  
14 emotionally abused Maria and used tactics and manipulation to make her feel inferior, degraded,  
15 and threatened so she would continue to think she needed him. And he maintained power by  
16 isolating Maria from others while undermining her both professionally and personally. For  
17 example, when Belafonte believed Maria was taking steps toward repairing her relationship with  
18 her mother, which could have diminished his authority, he disparaged her mother in an attempt to  
19 block Maria from developing another trusted sphere of influence. Entrusted with Maria’s finances  
20 and relationships, Belafonte allowed others to steal from her, and he defrauded Maria and skimmed  
21 money for himself as if her accounts were his personal piggy bank. On information and belief, his  
22 actions were driven in large part to recreate the “good life” Belafonte lost in his divorce from Mel  
23 B.

24           7.       Maria brings this action to recover money misappropriated from her by Belafonte  
25 and others he aided, abetted, and conspired with. She does so despite Belafonte’s bullying penchant  
26 for orchestrating retribution and lying about and belittling women who dare to stand up to him.

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1 **THE PARTIES**

2 7. Plaintiff Maria Luisa Trevejo, professionally known as “Malu,” is an individual  
3 currently residing in the County of Los Angeles, State of California.

4 8. Plaintiff MLT World, LLC, is a Limited Liability Company duly organized and  
5 existing pursuant to the laws of the State of Florida.

6 9. Defendant Stephen Belafonte is an individual residing in the County of Los Angeles,  
7 State of California.

8 10. Plaintiffs do not know the true names and capacities of defendants sued in this  
9 Complaint as Doe 1 through Doe 50, inclusive, and therefore sue these defendants by fictitious  
10 names under Section 474 of the California Code of Civil Procedure. Plaintiffs will amend this  
11 Complaint to allege the true names and capacities of Doe 1 through Doe 50, inclusive, when  
12 ascertained. Plaintiffs are informed and believe, and on that basis allege, that each of the defendants  
13 named herein as Doe 1 through Doe 50, inclusive, is responsible in some manner for the occurrence,  
14 injury, and other damages alleged in this Complaint.

15 11. Plaintiffs are informed and believe that at all times material to this Complaint, each  
16 of the Defendants, including each Doe Defendant, was acting as the agent, servant, employee,  
17 partner, and/or joint venturer of, and in concert with, each of the remaining Defendants, including  
18 Doe Defendants, and while engaging in the acts and omissions alleged herein, each was acting  
19 within the course and scope of such agency, service, employment, partnership, joint venture, and/or  
20 concert of action. Each Defendant, in doing the acts alleged herein, was acting both individually and  
21 within the course and scope of such agency and/or employment and with the full knowledge,  
22 consent, and/or ratification of the remaining Defendants.

23 **JURISDICTION AND VENUE**

24 12. Jurisdiction is proper in the Los Angeles Superior Court because it has general  
25 subject matter jurisdiction and no statutory exceptions to jurisdiction exist.

26 13. This court has personal jurisdiction over Belafonte because he is an individual  
27 residing in the County of Los Angeles, State of California.

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1 14. Venue is proper in this Court because Belafonte is an individual residing in Los  
2 Angeles, California and the acts and omissions alleged herein occurred in Los Angeles, California.

3 **FACTS COMMON TO ALL CLAIMS**

4 14 From a young age, Maria had been a gifted performer and gained a meaningful  
5 following after creating videos and distributing them on the app known as Music.ly.

6 15 Seeing Maria's star rise and knowing her situation alleged above, Belafonte sent her  
7 a message via Instagram in 2020 to inquire if she had a manager. When she told him that she did  
8 not, Belafonte flew to meet Malu in Miami to woo and inveigle her.

9 15. As part of his scheme, Belafonte represented that he was a licensed talent agent and  
10 a force in Hollywood, and that he could and would connect her with trustworthy people who would  
11 protect her best interests. He further represented that he could be trusted and would never do  
12 anything to jeopardize Maria personally, professionally, or financially. All of these representations  
13 were false, and Belafonte knew it.

14 16. After convincing Maria that he was trustworthy and would always act in her best  
15 interests, Belafonte presented Maria with a complex written management agreement that was  
16 chalked with legalese and complicated provisions. It included language purportedly (a) prohibiting  
17 Maria from having any representatives or agents other than himself (though he could represent  
18 anyone he wanted), (b) giving himself (but not her) the right to terminate, (c) reserving for himself  
19 (but not her) the right to extend the agreement after two years, (d) falsely representing that he was  
20 a licensed talent agent, and (e) falsely representing the agreement provided him with Maria's power  
21 of attorney when, in fact, it did not comply with the legal requirements prerequisite to him becoming  
22 Maria's attorney-in-fact. Belafonte presented the so-called management agreement to acquire and  
23 maintain control over Maria, both psychologically and professionally. Trusting Belafonte and  
24 believing his representations, Maria signed the agreement.

25 17. Whether the management agreement was legal and enforceable, in whole or in part,  
26 or whether Belafonte breached the agreement, in whole or in part, is not the subject of this  
27 Complaint. Valid or not, however, Belafonte used the agreement as one of his many tools to  
28 manipulate Maria psychologically and establish authority to exert control directly and/or indirectly





1 over her professional relationships and financial decisions.

2 18. Through her own talent, industry, and hard work – and little thanks to Belafonte –  
3 Maria’s income from social media exploded. She earned millions of dollars over 18 months. Maria’s  
4 career was a gold mine for Belafonte’s picking, and his emotional control, fraud, and financial abuse  
5 exploded right along with Maria’s earnings.

6 19. Belafonte connected Maria with employees and an accounting firm that Plaintiffs  
7 allege on information and belief would be loyal to him and complicit in his scheme to exploit her  
8 by transferring money to Belafonte without the appropriate checks and balances and rubber-  
9 stamping arrangements where Maria’s assets and money were misappropriated and wrongfully  
10 converted to Belafonte’s use or for his purposes.

11 20. Contrary to Maria’s best interests, Belafonte tried to keep people he could not control  
12 away from Maria by badmouthing her and picking fights with them, which caused them to forego  
13 working with her for reasons she did not understand. On information and belief, Belafonte shared  
14 private audio messages that Maria only sent to Belafonte to other people to embarrass her. On  
15 information and belief, Belafonte aided and abetted, and conspired with, people who defrauded  
16 Maria of money and stole from her, and Belafonte shared in the proceeds. Although the identities  
17 of everyone Belafonte aided and abetted are not yet known, the perpetrators and amounts they and  
18 Belafonte misappropriated will be shown according to proof at trial.

19 21. Belafonte had an appetite for exploiting Maria’s limited understanding of finance,  
20 contracts and real estate. In one instance on or about November 29, 2021, Belafonte caused a lease  
21 to be entered into in Maria’s name for a home in Beverly Hills. On information and belief,  
22 Belafonte intentionally misrepresented to Maria that she had only rented the property for a few  
23 months. Maria trusted and believed Belafonte’s representation. In fact, the term of the lease was  
24 for one year, and the accounting firm continued to pay the rent from Plaintiffs’ accounts with  
25 Belafonte’s knowledge. On information and belief, after conning Maria into believing that she no  
26 longer had use of the home, Belafonte then converted it to his own use. The result was that Maria  
27 was paying for hotels in Los Angeles for herself at the same time she was paying for the Beverly  
28 Hills home that Belafonte was using for his benefit.





1           26.     Beginning in or about November 2020, Defendants Belafonte and Does 1 through  
2 50, and each of them, knowingly made willful false representations to Plaintiffs, and knowingly  
3 concealed material information from them, with the intent of deceiving them – especially Maria –  
4 and to defraud them out of money and assets.

5           27.     Plaintiffs allege on information and belief that in November 2020, Belafonte falsely  
6 represented he was a licensed talent agent when, in fact, he was not. He made the misrepresentation  
7 to gain credibility and Maria’s trust and to induce her to turn control over her personal and  
8 professional life and, importantly, her finances so that he could misappropriate money from her,  
9 which he ultimately did.

10          28.     Plaintiffs allege on information and belief that in November 2020, Belafonte falsely  
11 represented that he was a force in Hollywood, and falsely promised that he could and would connect  
12 her with trustworthy people who would protect her best interests. He further misrepresented that he  
13 could be trusted and promised that he would never do anything to jeopardize Maria personally,  
14 professionally, or financially. The truth was that Belafonte knew he was virtually a pariah in many  
15 circles of Hollywood and the UK, that he had little (if any) favorable influence, and that he intended  
16 to jeopardize Maria by taking over her world to replace his own lost income stream through  
17 misappropriation and skimming of profits at great cost to Maria personally, professionally, and  
18 financially.

19          29.     Belafonte falsely represented and promised Maria that he would set her up with an  
20 independent accounting firm that would handle her money and financial accounts solely in her  
21 interests in conformance with their professional duties. Plaintiffs allege on information and belief  
22 that the truth, however, was that Belafonte intended to connect the Plaintiffs with an accounting  
23 firm that was loyal *to him* so that it would not question transactions where Belafonte caused unlawful  
24 transfers of Maria’s money to himself and others acting in concert with him. Pursuant to his fraud,  
25 on information and belief, beginning in approximately late 2020 or early 2021, Belafonte did, in  
26 fact, cause numerous transfers of money out of Plaintiffs’ accounts directly to himself and took  
27 “cuts” from money he caused to be transferred to others. Because Belafonte was lying to Maria,  
28 manipulating and controlling her, and isolating her from others, Maria did not suspect Belafonte’s





1 fraud or that her money was being misappropriated until at least mid-2022.

2 30. Regarding the home in Beverly Hills, Belafonte knowingly misrepresented to Maria  
3 that she had entered into a short-term lease, which she reasonably believed based upon the trust  
4 and confidence she had placed in Belafonte. The truth was that it was a year-long lease, and the  
5 monthly rent continued to be paid from Plaintiffs' accounts for Belafonte's benefit.

6 31. Due to Belafonte's intentional and unlawful siphoning of funds to himself and for  
7 his benefit, Maria's funds, which she needed for personal and household purposes, began to dwindle.  
8 Belafonte used Plaintiffs' financial statements and represented to Maria that she was in financial  
9 straits to cause her undue stress and worry, especially since Belafonte had concealed, and continued  
10 to conceal, his conduct. Belafonte then misrepresented that Maria needed to borrow money to cover  
11 expenses (such as the Beverly Hills home) when, on information and belief, the truth was that  
12 Belafonte needed to stop misappropriating her funds and to return what had been taken. Belafonte  
13 further misrepresented to Maria that the only loan she could qualify for was one from his "friend,"  
14 and he concealed that the interest rate would be exorbitant by any standards and amount equal to  
15 \$150,000.00.

16 32. All of the above-described concealments of fact, and representations, were false and  
17 material, and Belafonte knew the concealments of fact and representations of fact were false when  
18 he made them. Belafonte concealed facts and made the false representations to deceive Maria, secure  
19 and maintain access to her assets and earnings for himself and others acting in concert with him,  
20 and siphon her money to live off Maria's success (which she obtained on her own). Plaintiffs  
21 believed Belafonte's misrepresentations and, in some cases acted, and in other cases refrained from  
22 acting, in reliance thereon. Their reliance was reasonable because Belafonte had exploited Maria's  
23 youth and inexperience, and his emotionally manipulative behavior and isolation of Maria to control  
24 her and convince her that he was the "one" to protect her.

25 33. Investigations are ongoing and not yet complete, and Plaintiffs believe additional  
26 instances of fraud and concealment by Belafonte and others acting in concert with him will come to  
27 light.

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1 for personal fun and expenses from Plaintiffs' accounts; (f) using Plaintiffs' credit cards and money  
2 to pay for hotels and personal international travel; (g) knowingly allowing others to steal from Maria  
3 but failing to provide her with the information; (h) exploiting Maria's youth, inexperience, and  
4 insecurities to gain dominance over her and suppress her inquiries into his management and how  
5 her finances were being handled; (i) causing Maria undue financial stress and extreme financial  
6 anxiety by misappropriating and draining her funds as he used the Plaintiffs' accounts as if they  
7 were his own; (j) duping Maria into a \$400,000.00 loan with an excessive interest rate of \$150,000;  
8 and (k) disparaging Maria in the industry and picking fights and arguments with her business  
9 associates.

10 39. As a direct and proximate result of the conduct of the Defendants, and each of them,  
11 Plaintiffs have been damaged in an amount which has not yet been ascertained but which will be  
12 shown in an amount according to proof at the time of trial. Such damages include, but are not limited  
13 to, the rent on the Beverly Hills home for Belafonte's benefit, all amounts Belafonte charged Maria  
14 for his and others' personal fun and expenses, missing funds due to misappropriation, and the  
15 usurious loan and interest.

16 40. The conduct of Defendants Belafonte, Does 1 through 50, and each of them, was  
17 fraudulent, willful, malicious, oppressive and despicable and subjected Maria to cruel and unjust  
18 hardship in a conscious and willful disregard of her known rights. Moreover, Plaintiffs are informed  
19 and believe the Defendants, and each of them, engaged in their campaign of disparagement and  
20 misappropriation with the specific intent of causing harm and keeping Maria feeling vulnerable so  
21 they could maintain dominance and control and prevent her from standing up and enforcing her  
22 rights. The conduct of Defendants Belafonte and Does 1 through 50, and each of them, warrants the  
23 imposition of punitive damages commensurate with their wealth as a deterrent and to make an  
24 example of them pursuant to Civil Code section 3294.

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1 reference as though set forth in full.

2 47. Plaintiffs are informed and believe, and thereon allege, that beginning as early as late  
3 2020 and early 2021, Belafonte and Does 1 through 50, and each of them, entered into agreements  
4 with two or more people to engage in unlawful conduct including, but not limited to, defrauding  
5 Plaintiffs and stealing and misappropriating assets and money belonging to Maria individually,  
6 MLT World, LLC, separately, and the two of them jointly. Whether it was in new conspiracies or  
7 ongoing conspiracies, each member of the conspiracies acted in concert and came to mutual  
8 understandings to accomplish common and unlawful plans, and, in each instance, they committed  
9 overt acts and accomplished their plans.

10 48. As a direct and proximate result of the conspiracies and acts of the Defendants and  
11 conspirators, and each of them, Plaintiffs have been damaged in an amount that has not yet been  
12 ascertained but which will be shown according to proof at trial.

13 49. The conduct of Defendants Belafonte, the conspirators, and Does 1 through 50, and  
14 each of them, was fraudulent, willful, malicious, oppressive, and despicable and subjected Maria to  
15 cruel and unjust hardship in a conscious and willful disregard of her known rights and warrants the  
16 imposition of punitive damages commensurate with their wealth as a deterrent and to make an  
17 example of them pursuant to Civil Code section 3294.

18 **FIFTH CAUSE OF ACTION**

19 (By Plaintiffs against Belafonte and Does 1 through 50, inclusive,  
20 for Aiding and Abetting Conversion, Theft, and Misappropriation  
21 and Does 1 through 50, inclusive)

22 50. Plaintiffs reallege paragraphs 1 through 49 above and incorporate them herein by  
23 reference as though set forth in full.

24 51. Plaintiffs are informed and believe, and thereon allege, that beginning as early as late  
25 2020 and early 2021, third parties whose identities are yet unknown to Plaintiffs, stole and  
26 wrongfully converted assets and money belonging to Maria individually, MLT World, LLC,  
27 separately, and the two of them jointly.

28 52. Plaintiffs are further informed and believe, and thereon, allege that Defendants



1 Belafonte and Does 1 through 50 knew the third parties were stealing and misappropriating  
2 Plaintiffs' assets and money, and would continue doing so in the future. Moreover, Plaintiffs allege  
3 on information and belief that instead of stopping the illegal activity, Belafonte and Does 1 through  
4 50, by acts and advice, intentionally promoted the conduct and gave substantial aid and assistance  
5 to the perpetrators in furtherance of their goals, and himself profited as a result.

6 53. As a direct and proximate result of the acts of the third parties and Belafonte's  
7 conduct in aiding and abetting them, Plaintiffs have been damaged in an amount that has not yet  
8 been ascertained but which will be shown according to proof at trial.

9 54. The conduct of Defendants Belafonte, and Does 1 through 50, and each of them, was  
10 fraudulent, willful, malicious, oppressive, and despicable and subjected Maria to cruel and unjust  
11 hardship in a conscious and willful disregard of her known rights and warrants the imposition of  
12 punitive damages commensurate with their wealth as a deterrent and to make an example of them  
13 pursuant to Civil Code section 3294.

14 **SIXTH CAUSE OF ACTION**

15 (By Plaintiff Maria for Return of Usurious Loan Funds

16 and Interest against Belafonte and Does 1 through 50, inclusive)

17 55. Plaintiff realleges paragraphs 1 through 54 and incorporate them herein by reference  
18 as though set forth in full.

19 56. California usury statutes and Article 15 of the California Constitution makes it illegal  
20 to charge unconscionable interest rates above those set by law.

21 57. In or about July 2022, Belafonte hatched a plan for a "friend of his" to loan Maria  
22 \$400,000, supposedly to alleviate her emotional stress. Maria could have qualified for a bank loan,  
23 but Belafonte belittled her and told her that at "only 19," she was too young to obtain the loan from  
24 a bank. Belafonte knew that was false but made such representations to steer Maria away from  
25 banks and convince her to borrow money privately. Relying upon Belafonte's representations, and  
26 concerned about expenses, Maria did borrow the \$400,000 from Belafonte's "friend" in  
27 approximately July 2022. On information and belief, the reason Belafonte pressured Maria to  
28 borrow \$400,000 from his friend instead of a bank is that he intended her to repay the loan plus



1 interest at an unconscionable rate, and Belafonte shared in on the interest payments.

2 58. Two months after borrowing the money, Maria repaid the \$400,000 and, at  
3 Belafonte's behest, paid \$150,000 interest. In other words, Belafonte caused Plaintiff to pay  
4 \$150,000 for a \$400,000 loan only two months after the loan was funded. Plaintiff is informed and  
5 believes, and thereon alleges, Belafonte received all or part of the \$150,000 interest payment.

6 59. Plaintiff alleges the \$150,000 constituted usurious interest and seeks forfeiture of the  
7 entire amount from Defendants Belafonte and DOES 1 through 50, and each of them, and payment  
8 of triple amount of the interest as allowed by law and equity.

9 **SEVENTH CAUSE OF ACTION**

10 (By Plaintiff Maria for Intentional Infliction of Emotional Distress

11 against Belafonte and Does 1 through 50, inclusive)

12 60. Plaintiff Maria realleges paragraphs 1 through 59 above and incorporates them herein  
13 by reference as though set forth in full.

14 61. Defendant Belafonte's conduct as alleged herein was outrageous and so extreme as  
15 to go beyond the bounds of decency. Belafonte knew Maria's background, youth, and insecurity  
16 made her particularly vulnerable, so he used his older-man role to pose as her protector and gain her  
17 trust and put himself in a position of authority. Once there, he intentionally engaged in emotional  
18 abuse to wear down Maria's self-esteem and make her believe she needed someone – Belafonte –  
19 to oversee her personal and professional life. His purposeful emotional abuse included, but was not  
20 limited to, making disparaging and discrediting statements to Maria and behind her back, isolating  
21 Maria from people who might stop him, using her fears and triggers to control her, misappropriating  
22 her funds and raising her depleted financial condition to create anxiety and worry, and a barrage of  
23 criticism. Belafonte knew his behavior would result in emotional harm to Maria and intentionally  
24 engaged in it specifically for that purpose so he could stay in control by pummeling her self-esteem.

25 62. Belafonte engaged in ongoing cruel behavior for at least 18 months, and it was so  
26 severe that it caused Maria to suffer substantial anguish, fright, nervousness, loss of sleep,  
27 depression, anxiety and humiliation to a degree that no reasonable person in a civilized society  
28 should be expected to bear.





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Dated: January 17, 2023

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