

1 HANSON BRIDGETT LLP
LAWRENCE M. CIRELLI (SBN 114710)
2 lcirelli@hansonbridgett.com
MARGARET A. ZIEMIANEK (SBN 233418)
3 mziemianek@hansonbridgett.com
G. THOMAS RIVERA III (SBN 333556)
4 trivera@hansonbridgett.com
425 Market Street, 26th Floor
5 San Francisco, California 94105
Telephone: (415) 777-3200
6 Facsimile: (415) 541-9366

7 Attorneys for Defendant
ASHLEY GORE a/k/a ILLMA GORE

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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

12 BRIAN WARNER, p/k/a MARILYN
13 MANSON,

14 Plaintiff,

15 v.

16 EVAN RACHEL WOOD, ASHLEY GORE
17 a/k/a ILLMA GORE,

18 Defendants.

Case No. 22STCV07568

**DECLARATION OF MARGARET A.
ZIEMIANEK IN SUPPORT OF
DEFENDANT ASHLEY GORE'S
SPECIAL MOTION TO STRIKE
COMPLAINT [CODE OF CIVIL
PROCEDURE § 425.16]**

Reservation: 662859254881

Judge: Hon. Teresa A. Beudet

Date: January 31, 2023

Time: 2:00 p.m.

Dept.: 50

Action Filed: March 2, 2022

1 I, Margaret A. Ziemianek, declare as follows:

2 1. I am an attorney duly admitted to practice before this Court. I am Counsel
3 for Hanson Bridgett LLP, attorneys of record for Defendant ASHLEY GORE a/k/a ILLMA
4 GORE. I have personal knowledge of the facts set forth herein, except as to those stated
5 on information and belief and, as to those, I am informed and believe them to be true. If
6 called as a witness, I could and would competently testify to the matters stated herein.

7 2. On May 17, 2022, I emailed Plaintiff's counsel to advise them that Ms. Gore
8 intended to file an anti-SLAPP motion on primarily the same grounds as Ms. Wood's
9 motion. I participated in a meet and confer call with Plaintiff's counsel on May 19, 2022
10 but we were unable to resolve the issues raised in the motion.

11 3. Attached hereto as **Exhibit 1** is a true and correct copy of a November 14,
12 2021 article in Rolling Stone, entitled "Marilyn Manson: The Monster Hiding in Plain
13 Sight," available at [https://www.rollingstone.com/music/music-features/marilyn-manson-](https://www.rollingstone.com/music/music-features/marilyn-manson-abuse-allegations-1256888/)
14 [abuse-allegations-1256888/](https://www.rollingstone.com/music/music-features/marilyn-manson-abuse-allegations-1256888/) (last accessed May 24, 2022).

15 4. Attached hereto as **Exhibit 2** is a true and correct copy of the California
16 Phoenix Act, as approved by the Legislature and approved by Governor Gavin Newsom
17 on October 7, 2019.

18 5. Attached hereto as **Exhibit 3** is a true and correct copy of a November 29,
19 2021 AP News article, entitled "Marilyn Manson's Home Raided by L.A. County Sheriff in
20 Sexual Assault Investigation," available at [https://apnews.com/article/entertainment-](https://apnews.com/article/entertainment-music-arts-and-entertainment-los-angeles-sexual-abuse-a88f173024a1967d4ab12c57a2e64773/)
21 [music-arts-and-entertainment-los-angeles-sexual-abuse-](https://apnews.com/article/entertainment-music-arts-and-entertainment-los-angeles-sexual-abuse-a88f173024a1967d4ab12c57a2e64773/)
22 [a88f173024a1967d4ab12c57a2e64773/](https://apnews.com/article/entertainment-music-arts-and-entertainment-los-angeles-sexual-abuse-a88f173024a1967d4ab12c57a2e64773/) (last accessed May 24, 2022).

23 6. Attached hereto as **Exhibit 4** is a true and correct copy of a November 8,
24 2020 article in Rolling Stone, entitled "Courtney Love Dishes Dirt at ROCKRGR L
25 Conference," [https://www.rollingstone.com/music/music-news/courtney-love-dishes-dirt-](https://www.rollingstone.com/music/music-news/courtney-love-dishes-dirt-at-rockrgrl-conference-255337/)
26 [at-rockrgrl-conference-255337/](https://www.rollingstone.com/music/music-news/courtney-love-dishes-dirt-at-rockrgrl-conference-255337/) (last accessed May 24, 2022).

27 7. Attached hereto as **Exhibit 5** is a true and correct copy of a webpage
28 entitled "Video Interview: Marilyn Manson Dinner for Five," available at

1 https://www.mansonwiki.com/wiki/Video_Interview:Marilyn_Manson_Dinner_For_Five
2 (last accessed May 24, 2022), and specifically the transcript of the discussion related to
3 “Groupie.” The relevant portions are highlighted.

4 8. Attached hereto as **Exhibit 6** is a true and correct copy of a webpage
5 entitled “Groupie (Partially Found Late 90s Short Film by Marilyn Manson,” available at
6 [https://lostmediaarchive.fandom.com/wiki/Groupie_\(Partially_Found_Late_90s_Short_Fil](https://lostmediaarchive.fandom.com/wiki/Groupie_(Partially_Found_Late_90s_Short_Film_by_Marilyn_Manson))
7 [m_by_Marilyn_Manson\)](https://lostmediaarchive.fandom.com/wiki/Groupie_(Partially_Found_Late_90s_Short_Film_by_Marilyn_Manson)) (last accessed May 24, 2022).

8 9. Attached hereto as **Exhibit 7** for the Court’s convenience is a true and
9 correct of the Complaint filed by Plaintiff Brian Warner, p/k/a Marilyn Manson, which has
10 been edited to identify the portions of the Complaint Defendant Gore moves to strike.
11 These portions are also listed in the Notice of Motion filed concurrently herewith.

12 10. Attached hereto as **Exhibit 8** is a true and correct copy of a webpage
13 entitled “Adina Slotsky,” available at
14 https://www.mansonwiki.com/wiki/Adina_Slotsky#cite_ref-Dominatrix_1-0 (last accessed
15 May 24, 2022).

16 I declare under penalty of perjury under the laws of the State of California that the
17 foregoing is true and correct.

18 Executed on this 24th day of May, 2022, at San Francisco, California.

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Margaret A. Ziemianek

EXHIBIT 1

Marilyn Manson: The Monster Hiding in Plain Sight

 [rollingstone.com/music/music-features/marilyn-manson-abuse-allegations-1256888](https://www.rollingstone.com/music/music-features/marilyn-manson-abuse-allegations-1256888)

By Kory Grow

November 15, 2021



Illustration by Sean McCabe. Photograph by Kurt Krieger/Corbis/Getty Images

[Home Music Music Features](#)

He was a provocative media darling for decades. Offstage, exes allege, he was an abuser who made their lives hell. A Rolling Stone investigation based on court documents and more than 55 new interviews

It started as a vocal booth.

A decade before [Marilyn Manson](#) rented the apartment above a West Hollywood liquor store circa 2010, a former tenant — a label and recording studio specializing in electronic music — had built the cramped glass enclosure in the corner of a room with the goal of making uptempo, life-affirming house music. The only adornment was some foam for soundproofing on the walls.

Manson, whose real name is Brian Warner, soon converted the booth into what several people who dated and worked with him now describe as a solitary-confinement cell used to psychologically torture women. They say Warner frequently banished his girlfriends there, keeping them inside for hours on end to punish them for the tiniest perceived transgressions. He called it the “Bad Girls’ Room.”

Ashley Walters, a former assistant [suing Warner for sexual assault](#) and other charges, says he enjoyed telling people about the chamber. “He always had a joking, bragging tone,” she remembers. (Another former assistant, Ryan Brown, who worked with Warner for eight years, denies ever seeing any women confined in the so-called Bad Girls’ Room, but says, “It

was common knowledge that's what everybody had called it.") In interviews, it was an open secret. "If anyone's bad, I can lock them in it, and it's soundproof," Warner boasted to a magazine in 2012.

Ashley Morgan Smithline, who is suing him for sexual assault and unlawful imprisonment, among other charges, tells *Rolling Stone* that Warner repeatedly forced her to stay in the space — which was about the size of a department-store dressing room — for hours at a time when they were dating.

"At first, he made it sound cool," Smithline says. "Then, he made it sound *very* punitive. Even if I was screaming, no one would hear me." As she tells it, "First you fight, and he enjoys the struggle. I learned to not fight it, because that was giving him what he wanted. I just went somewhere else in my head."

The rest of Warner's apartment was decorated with blood, swastikas, and clipped photos from porno mags. "There were vaginas everywhere," says one person who visited the place. Others recall a spray-painted message above his bed reading "AIDS." The carpets, furniture, and decorations were black, as were the curtains he used to blot the light out of every window nearly 24 hours a day. The temperature was kept frigid; if anyone adjusted the thermostat above 65 degrees, Warner allegedly threw temper tantrums and destroyed furniture.

One ex-girlfriend has referred to the apartment as a "black refrigerator." Another has called it a "meat locker." It was here, multiple exes allege, that Warner inflicted repeated acts of mental, physical, and sexual abuse that have left them with crippling bouts of anxiety, depression, panic attacks, and PTSD.

Game of Thrones actress Esmé Bianco alleges that Warner frequently abused her verbally; deprived her of sleep and food; bit, cut, electrocuted, and whipped her without her consent; and raped her during their two years together. Bianco alleges that, in one horrifying episode, Warner wielded an ax and chased her around the apartment smashing holes in the walls after saying she was "crowding him."

"That was a final-straw moment for me," Bianco, who has sued Warner for sexual assault and sex trafficking, tells *Rolling Stone*. She says she felt "in imminent danger for [her] life." Leaving, she says, "was my best attempt to survive."

In October 2020, in the living room of a Los Angeles home, Bianco's body shook and her eyes welled as she recounted that moment to about a half-dozen other women, including Walters, Smithline, actress Evan Rachel Wood, and model Sarah McNeilly. Some of the women knew one another; others were strangers. Yet the group shared a reluctant bond: Each of them said that Warner had abused them.

Walters felt stunned hearing some of the stories that day. "I just thought, 'I can't believe this happened to so many girls,'" she says. "Once we started talking ... you could see the blood drain out of everyone's face, like, 'I thought I was the only one.'"

In the past year, more than a dozen women have come forward accusing Warner of psychological or sexual abuse, several in interviews with outlets such as the *Los Angeles Times* and *People*; four have filed civil lawsuits. The accusers who spoke with *Rolling Stone* say that Warner was able to hide his abuses in plain sight behind the Marilyn Manson character he created and the music industry that supported, and profited from, his living-demon shtick. To his accusers, some of whom have not spoken publicly or in depth about this before, he is a serial sexual predator who has been telling the world who he is for more than 25 years. This investigation is based on nine months of research, court documents, and interviews with more than 55 people who have known Warner at various points throughout his life.

According to a statement from his attorney, Warner “vehemently denies any and all claims of sexual assault or abuse of anyone.” The statement — which echoes a July court filing that sought to dismiss claims in a lawsuit filed by Bianco — goes on to denounce the accusers’ allegations as “part of a coordinated attack by former partners and associates of Mr. Warner who have weaponized the otherwise mundane details of his personal life and their consensual relationships.” Warner has further argued in court filings that his accusers “are desperately trying to conflate the imagery and artistry of [his] ‘shock rock’ stage persona, ‘Marilyn Manson,’ with fabricated accounts of abuse.”

“He has a way of getting in your brain,” McNeilly says. “I didn’t tell that many people what had happened to me, because so many people saw it happening and didn’t care.”

For the past three decades, the defining quality of Warner’s art has been his total rejection of conventional morality. Initially, his career was an assault on Christian values. He led chants of “We hate love, we love hate” at concerts and scored hits with lyrics like “There’s no time to discriminate/Hate every motherfucker that’s in your way.” The music and the band’s outrageous T-shirts were perfect fodder for hard-rocking goths who wanted to worry their parents.

That impish Marilyn Manson is the one that Halsey got tattooed on her rib cage and the one whose visage Lil Uzi Vert reportedly paid \$220,000 to have turned into a bejeweled pendant. But former friends of Warner tell *Rolling Stone* that at some point he got caught in a state of arrested development and embraced “Marilyn Manson” as a lifestyle. It was this Manson who allegedly bragged about having a “rape room” in his apartment to a teenage Phoebe Bridgers — “I thought it was just his horrible frat boy sense of humor,” she tweeted this year — and whose scandalous public image has been increasingly mirrored in accusations of real-life abuse.

Warner has often joked in interviews about abusing women. For decades, the media has amplified and glamorized his voice — including *Rolling Stone*, which put him on the cover in 1997 with the headline “Sympathy for the Devil.” (Former contributing editor Neil Strauss, who wrote that story and co-authored Warner’s bestselling 1998 memoir, *The Long Hard Road Out of Hell*, could not be reached for comment for this article.) Warner established

himself early on as a defender of free speech, proclaiming his right to offend. His eloquence, coupled with his freak-show Prince of Darkness look, made him a media darling whose most shocking statements were normalized.

That all changed this year, when Wood, Bianco, and others came forward. Interviews with and legal filings by Warner's accusers paint a picture of someone who conditioned women through flattery and dark humor before introducing a pattern of sexual and physical abuse. Accusers allege that he plied them with drugs and alcohol, controlled their eating and sleeping habits, and held them captive emotionally and physically until they submitted to his will. If they wanted to leave him, they say, he'd threaten to kill himself or, worse, them. They describe him as employing a cult-leader mentality that allowed him to hold complete power over them. "It was Brainwashing 101," Smithline says.

Within months of the July 1994 release of *Portrait of an American Family*, Marilyn Manson's first middle finger to the world, an ardent fan base was clamoring to embrace the band's sophomoric darkness. The cutting industrial-metal backdrops made Warner's rancorous words (Sample lyric: "Who says date rape isn't kind?") all the catchier.

Letters sent to the group's fan club, Satan's Bake Sale, include declarations of devotion and demands for merchandise, especially a T-shirt that framed the message "Kill God ... Kill Your Mom & Dad ... Kill Yourself" in a sarcastic disclaimer. Manson's devotees connected with his macabre affectations and provocative stage spectacles — aspects of the persona that Warner had been cultivating for years by then. "Having people congregate and feel accepted, that was his big thing," says one source close to Warner. "The cultlike mentality was to cultivate a mass market of disenfranchised people."

Warner grew up in Canton, Ohio, where he was raised by helicopter mechanic turned furniture salesman Hugh Warner and nurse Barbara Wyer. Hugh had a violent temper, according to his son, and an oddball personality. "When I was in the fifth grade, the first time I had friends over from Christian school, my dad would always like to tell his favorite joke," Warner claimed in 2012. "He'd say, 'Hey, have you ever sucked a sweeter dick than mine?' ... Whether you say yes or no, you're admitting to something." According to one of Brian's ex-girlfriends, Missi Romero, in the 2000 documentary *Demystifying the Devil*, "Hugh always had a thing for younger girls at Brian's show." (Romero, who was 17 when she started dating a 23-year-old Warner, did not return *Rolling Stone's* requests for comment for this story.)

In 1997, Warner described himself as "kind of a mama's boy." "I had a weird relationship with my mom as a kid," he added, "because it was kind of abusive — but on my part." He wrote in his memoir that he once assaulted her with a perfume bottle, scarring her, when he thought she had cheated on his dad.

Tim Vaughn, who says he was friends with Warner in the early 1990s, remembers Warner frequently cursing and screaming at Barbara. Once, Vaughn recalls, "He chased her down the hallway with a microphone stand. I asked him, 'What the fuck is wrong with you?' He's like,

“The bitch is always coming in at the worst times.”



Warner circa 1990 in Fort Lauderdale, Florida.
Marc Serota/Getty Images

In Warner’s first known interview, in 1990, he defined Marilyn Manson’s music with a term that foreshadowed the glib way he’d flirt with misogyny for the rest of his career: “What we have come to call it is ‘beat up your mom’ music.” The group would later christen their music-publishing company Beat Up Your Mom Music. (Barbara died in 2014 after being diagnosed with dementia. Hugh died three years later.)

Warner gained an appreciation for the finer aspects of satanic panic at Canton’s fundamentalist-leaning Heritage Christian School. “There was a lot of shaming,” says a Heritage classmate who requested anonymity. (The school did not reply to a request for comment.)

One class dealt with the dangers of rock music, which led Warner to adore Black Sabbath, David Bowie, and Queen. In 1979, when Brian was 10, Hugh dressed up like Gene Simmons and brought him to see Kiss for his first rock concert.

Warner’s family moved to Fort Lauderdale, Florida, when he was 18, and he enrolled in Broward Community College, where he became interested in journalism and got a gig covering music at a local publication, *25th Parallel*. “The first thing that I thought about him

was that he probably got beaten up a lot as a kid,” former *25th Parallel* editor Paul Gallotta said in *Demystifying the Devil*. “He had a lot of anger and hostility, but he was a very quiet person; you know, the kind that you expect was going to be a serial killer someday.”

People who knew him in his early Florida days remember an awkward blond young adult who wanted to learn all he could about rock music. One former friend remembers Warner bringing a pen and notebook to Lollapalooza '91, where he took notes on Perry Farrell's stage act. “When I met him, he was wearing a pair of brown corduroy pants and a long surfer shirt,” says Nancy Marzulli, another person who knew him around this time. “He was a square kid from Ohio. Scared of his own shadow. He was quiet like a mouse. Wouldn't say a word.”

“Did I want to make him my best friend? No,” says Paige Harvey, former frontwoman for local band the Livid Kittens. “I always thought there was something a little dark about him, but I didn't know exactly what.”

Somewhere between selling CDs at the record store he managed and interviewing Debbie Harry, Malcolm McLaren, and the Red Hot Chili Peppers for *25th Parallel*, Warner decided that he could give better interviews than his subjects. All he needed was a band and an act, which evolved from a character he'd developed for a short story named Marilyn Manson — a moniker that combined the names of America's most beloved sex symbol with America's bogeyman. “He was a character who, because of his contempt for the world around him and, more so, himself, does everything he can to trick people into liking him,” Warner wrote in his memoir. “And then, once he wins their confidence, he uses it to destroy them.”

“He named himself after a serial killer and a woman who had a very tragic life,” adds a source who has known Warner for decades. “He told us who he was.”

A fan of industrial pioneers Ministry and My Life With the Thrill Kill Kult, Warner sought out like-minded musicians for his anti-society screeds. The first lineup of what would soon be known as Marilyn Manson and the Spooky Kids featured Warner singing alongside bassist Brian Tutunick, a.k.a. Olivia Newton Bundy, and guitarist Scott Putesky, who called himself Daisy Berkowitz. Like the industrial group Big Black, they played to a drum machine at their first gigs in late 1989 and early 1990.

At their first gig, Warner recalled in his book that he wore a T-shirt showing Marilyn Monroe with a Charles Manson swastika scribbled on her forehead. Other band members dressed in bright, flowery clothing raided from local thrift stores. “They were basically burlesque,” says Rick Myers, who taught Warner broadcasting in school. “It was kind of a goof. One time, they had a duffel bag sitting beside the drums all night. Before the last song, they dragged it out and put it in front of the mic stand. They start playing the song, and a guy got out of the bag and stood up and recited a Captain Beefheart poem and then got back in the bag and closed it up.”

In his memoir, Warner wrote about abusing a woman he called “Nancy” as part of his early stage act, describing how he would hold her by a leash and beat her onstage — “to make a point about our patriarchal society, of course, not because it turned me on to drag a scantily clad woman around the stage,” he wrote. He also claimed in the book that he and a bandmate plotted murdering Nancy before changing their minds. (When reached by phone, “Nancy” declined to comment for this article.)

Harvey, the local musician, remembers feeling unsettled when she saw a woman “locked in a cage” at Manson shows. “He would hit her or kick the cage,” she says. “It was part of the shtick, I guess. I’m not a prude or anything. I just remember thinking, ‘That’s not cool.’”

Friends of Warner’s from that time say that he taped sexual encounters and showed them to other people. Russell Vaughn recalls hanging out one night with his brother Tim Vaughn, a female friend, and Warner. “Brian popped in a compilation tape of every girl he had ever taken into his closet for a blowjob,” he says. “He was proud of it.” Both Vaughn’s brother and the friend, who asked to remain anonymous, confirm seeing the tape to *Rolling Stone*.

After Warner befriended Jeordie White, later known as Manson bassist Twiggy Ramirez, the pair started prank-calling a woman who worked at their local mall. They’d threaten her, telling her they were watching her, and Warner claimed in his book that they once told her, “We’re going to rape you in the parking lot and then crush you underneath your own car.”

“I thought he was a bully,” says a source who met Warner in his Spooky Kids days and stayed friends with him for the next two decades. “He was charismatic and talented, but from the beginning it was his way or the highway.”

Laura Werder, who took some of the first photographs of the band, ended up running the Satan’s Bake Sale fan club on and off until 1994. “There were underage girls sending nude pictures of themselves, people writing letters in blood,” she says. Warner referred to the club’s members as “the Family” (another nod to Charles Manson), and Werder remembers a newsletter urging those followers to break the law. “They were like, ‘We are having a contest to see who can send us a Polaroid with the most deviant usage of our logo,’” she recalls. “For example, ‘Your father’s passed out drunk and naked, you carve “Marilyn Manson” on his bald forehead and snap a picture.’... He was pushing people’s buttons. How far will people go?”

In 1993, the band signed with a label run by Nine Inch Nails’ Trent Reznor, an artist Warner had interviewed in his pre-Manson days, and distributed by Interscope Records. With the pressure on, some of Warner’s former friends questioned whether he could live up to his own act. “I think when Trent signed him, it was, ‘I need to become everything that I’m singing about,’” says Tutunick, who had left the band a few years earlier. “I don’t remember any drugs when we were hanging out; he didn’t even drink. He was willing to sacrifice who he was to become this character he created.”

Rolling Stone described the band’s Reznor-produced 1994 major-label debut, *Portrait of an American Family*, as a “splatter-glam album ... that includes a song about child molestation that could be seen as not entirely disapproving.” (“As a kid I experienced many different types of sexual abuse from all different directions,” Warner claimed in an interview the following year.)

If the lyrics about sex abuse didn’t attract an audience, Marilyn Manson’s blasphemous antics, such as tearing up Bibles onstage, did — along with protests and show cancellations. “The animosity is what springboarded him to fame, and he rode it,” Werder says.

The band gained traction by opening for Nine Inch Nails on a 1994 tour that featured debauched aftershow parties. In an interview with photographer Richard Kern the following year, Warner joked that he couldn’t discuss groupies “because of the statute of limitations.” He also unpacked the “Sweet Tooth” lyric “I want you more when you’re afraid of me.” “I’ve grown accustomed to getting sexual excitement out of a girl’s screaming,” Warner said. “There’s something about a terrified girl that I find exciting.”



Onstage in California, October 1994.
Tim Mosenfelder/Getty Images

The next year, on a tour supporting Danzig, Warner befriended bus driver Tony Wiggins, who joined Warner and White in humiliating and abusing young women and men backstage, according to Warner’s book. In *The Long Hard Road Out of Hell*, Manson recounts a time that Wiggins supposedly affixed a nude male fan, who had agreed to be tied up, to a device

that spread his legs apart in a way that if he moved, ropes would tighten around his neck, choking him. “In order to keep from strangling himself, he had to work to keep himself in this awkward, vulnerable position,” Warner wrote. “Tony stood over him with a video camera, capturing his struggle from every angle.” (Wiggins declined to comment for this article.)

1995’s *Smells Like Children* EP marked a rare instance where Manson’s label told him he had crossed the line. The initial track list contained two terrifying audio vignettes titled “Abuse” culled from their recordings with Wiggins. In one, a young woman whimpers and screams in apparent agony as the bus driver asks, “You like it, don’t you?” while whipping her and rattling chains; in the other, a young woman describes molesting a six-year-old boy.

“That was the point when Interscope said, ‘Yeah, this is too much for us,’” says one person who worked on the EP.

“Everybody was like, ‘There’s no fucking way — we have to change this,’” another person involved in the EP launch adds.

But Marilyn Manson kept getting bigger. With the thumping, anthemic single “The Beautiful People,” the band’s second album, *Antichrist Superstar*, became a surprise hit in 1996, earning Warner his first *Rolling Stone* cover.

Like the murderers in *Natural Born Killers*, a box-office smash the year of Manson’s debut, the hints of danger in his persona seemed to make Warner an irresistible media sensation. With his over-the-top act, he was a hit with talk-show hosts who bemoaned the future of America’s youth. He even appeared on *The Phil Donahue Show*, trotted out like a sideshow attraction to defend moshing. And when the U.S. Senate held a hearing in 1997 related to a 15-year-old Marilyn Manson fan’s death by suicide — future vice-presidential nominee Joe Lieberman called the music “reprehensible,” singling out the lyrics as “some of the worst thoughts I’ve ever heard” — it only made Warner more of a rebellious alt-rock icon to his fans.

Many of Warner’s accusers charge that the media’s embrace of an act full of barely concealed hateful aggression enabled him to abuse behind the scenes — and sometimes in plain sight — without scrutiny. “We give an awful lot of slack to men like this, and especially in the music industry,” Esmé Bianco says. “If you’re not a womanizer and a complete misogynist, are you really a rock star at all?”

Behind the scenes, tensions in the band were mounting. A 1996 label showcase devolved into violence when Warner vaulted his microphone stand into drummer Kenneth Wilson, sending him to the hospital. “[I’m] playing the drums, and also trying to read Manson’s mind,” Wilson said in an interview the following year. “If I miss a cue, I’m liable to get a mic stand thrown at my skull.” (Wilson did not reply to requests for comment.)

Around the same time, Warner linked up with manager Tony Ciulla, who would go on to oversee his career for the next 25 years. “Tony was the only dude who could tame the beast when shit was going down,” says a former Marilyn Manson band member. “When Manson would fucking destroy a venue or a hotel, Tony would be there with a checkbook and a smile.” (Ciulla did not reply to repeated requests for comment.)

In 1997, Warner fell for Rose McGowan, an actress in her mid-twenties who had starred in the art-house black comedy *The Doom Generation* a few years earlier. He proposed marriage, but McGowan called off their engagement in 2001. After the abuse allegations came out, she released a statement on Instagram: “When he was with me, he was not [abusive] like that, but that has no bearing on whether he was like that with others, before or after ... I’m proud of these women and anybody who stands against an abuser.” (McGowan did not reply to a request for comment.)

Throughout this time, Warner continued making art imbued with intense misogyny. In 1998, he released *Dead to the World*, a concert video that includes a short clip of *Groupie*, a longer film Warner had made in which he verbally abuses a woman. The clip shows a woman screaming “Stop” as Warner tells her to “Sit down” and “Shut the fuck up.” (“It was acting,” Pola Weiss, a longtime friend who starred in *Groupie*, tells *Rolling Stone*. “It was hamming it up.”) Of the full film *Groupie*, Warner once said, “When I showed it to my manager, he said, ‘Please hide the masters. If anyone sees this you’ll go to jail and your career will be over.’” Several ex-girlfriends have alleged that Warner nevertheless showed it to them with pride.

The moral panic around Warner heightened toward the end of the Nineties, with press reports tenuously tying his fans to school shootings in Mississippi and Oregon and a supposed gang in Michigan. None of it stopped Warner — in fact, it likely helped boost sales of his 1998 memoir. One of his friends from Florida recalls this as the point in which the Marilyn Manson persona overtook Warner; if this person, who wished to remain anonymous, were to call him “Brian,” he’d insist on being called “Marilyn.”

“Manson is the kind of person who looks for weakness in people,” says a source who was present during the sessions for 1998’s *Mechanical Animals*. “He’d find something that would wind someone up so hard that they were getting visibly shaken and upset. And that would be the thing that he would use any time he addressed them. It was very manipulative and it was unpleasant.”

Mechanical Animals spun off a hit with “The Dope Show,” but the album underperformed sales projections. That fall, then-*Spin* editor Craig Marks took Warner off the magazine’s cover and replaced him with a more buzzworthy Manson: Garbage’s Shirley Manson. In a legal complaint, the editor described a chilling scene when he went backstage at one of Warner’s shows in New York: “Manson ... began to threaten Marks by shouting that he could kill Marks, his whole family, and everyone he knew,” the complaint alleged. “Before Marks could respond, [Warner’s bodyguards] physically attacked him.... Manson approvingly exclaimed, ‘That’s what you get when you disrespect me.’”

“I walked into the dressing room, and everybody was just frozen, just dead still,” remembers an eyewitness who wishes to remain anonymous. “Manson’s security guy was holding this kid up against the wall.” (The case was settled out of court.)

The biggest challenge yet to Manson’s career at that point came on April 20, 1999, when two teenagers gunned down 12 of their fellow pupils and one teacher at Columbine High School in the Denver suburb of Littleton. Early reports suggested the killers were Marilyn Manson obsessives; it later became clear that they had been fans of industrial groups like KMFDM and Rammstein. Within days of the shooting, Warner called the assailants’ act “tragic and disgusting.” Far-right religious groups picketed his concerts, stoking his fan base, and he was slowly able to turn public opinion in his favor.

When he appeared in Michael Moore’s documentary *Bowling for Columbine*, which came out in 2002 amid Manson’s foundering album sales, Warner spoke intelligently and concisely. “I think it’s easy to throw my face on the TV because I’m, in the end, sort of a poster boy for fear,” he said. When Moore asked what he’d say to the kids at Columbine “if they were here right now,” Warner replied: “I wouldn’t say a single word to them. I would listen to what they have to say, and that’s what no one did.”

Years later, his tone was more flippant. “I got blamed for Columbine, and I had absolutely nothing to do with it,” he said in 2012. “At least [the killers] had their kicks before the whole shithouse went down in flames.”

Warner’s career recovered after Columbine, but his image shifted as the public began to view him as more of a caricature. In 2001, the satirical newspaper *The Onion* ran the headline “Marilyn Manson Now Going Door-to-Door Trying to Shock People.”

Offstage, Warner worked to distance himself from his past. He checked into hotels under the pseudonym “Patrick Bateman,” the murderer in *American Psycho*, and he had trouble maintaining relationships with band members. His former mentor Reznor was long gone by now: “[Warner] is a malicious guy and will step on anybody’s face to succeed and cross any line of decency,” the Nine Inch Nails frontman said in a 2009 interview. “Drugs and alcohol now rule his life, and he’s become a dopey clown.” (Reznor declined an interview for this story.)

Warner was also getting a reputation for using racial slurs. “He said the n-word quite a bit,” recalls an associate from later in his life, who felt that Warner “almost reveled in being able to say it in front of Black people.”

In 2001, Warner faced criminal and civil charges brought by Joshua Keasler, an Ozzfest security guard who accused Warner of grinding his crotch against him at a Detroit show. The lawsuit was settled out of court, and Warner ended up pleading no contest to disorderly conduct after a sexual-assault charge was dropped.

Keasler says now that he's been upset to read of more recent assault allegations against Warner, and he wonders if his legal case 20 years ago could have done more to protect women: "Had he been a registered sex offender, maybe one of those young ladies would have considered a little longer before they thought, 'Maybe this isn't the guy I want to hang out with.'"

The next decade and a half went by in a blur of misogyny and boundary pushing. "Whatever I do, whatever I say, I am Marilyn Manson now," Warner said in 2003. "I can't turn it off."

A yearlong marriage to burlesque performer Dita Von Teese ended in 2007 after she accused him of infidelity and drug abuse. "I was trying to get him help for his problems, and eventually I realized that he didn't want help," she said at the time. (Von Teese did not reply to a request for comment.)



Evan Rachel Wood testifies during a congressional hearing on sexual assault survivors' rights in 2018.
Bill Clark/CQ Roll Call/Getty Images

He moved on with Wood, who met Warner at Los Angeles' Chateau Marmont when she was 18 and he was twice her age; in interviews, he described her as a Lolita-like muse. "In the beginning, he was nice, charming, and I never thought he would hurt me," she wrote, without

naming Warner, in a letter to the Connecticut General Assembly on coercive control earlier this year. “He moved very fast in our relationship, telling me I was his soulmate and that we should move in together just shortly after we started dating.”

Within a year, Warner and Wood had broken up for the first time, inspiring the song “I Want to Kill You Like They Do in the Movies,” on his 2009 album *The High End of Low*. The video for another song on that album features a man repeatedly punching a Wood look-alike in her underwear. Warner told Spin that year that he had “fantasies every day about smashing her skull in with a sledgehammer.”

Bianco, who dated him later on, is haunted by quotes like that now. “Everyone passed it off as theatrical, like, ‘There goes Marilyn Manson,’” she tells *Rolling Stone*. “But when he started turning ugly against me, I was like, ‘Oh, he wasn’t kidding.’”

In 2009, when *The Guardian* asked Warner what his greatest fear was, he responded, “Fear is something I instill in other people, mostly young girls.” At a concert the same year, Warner told the crowd, “When you laugh after you fuck her, it is not rape.” “He would joke about rape all the time,” says a source who knew him around that time, echoing multiple people who spoke for this story. “He loved the idea of rape — talking about rape, seeing it in the movies.”

This lines up with Bianco’s allegations. “Before I was even in a relationship with him, he talked about raping me,” she claims. “[I thought], ‘I guess that’s just how he rolls and everyone is cool with it, so who am I to not laugh along?’”

Warner and Wood split for good in 2010, with Wood keeping the abuse she allegedly suffered a secret for years. The same summer they split, Warner began speaking frequently to Smithline, a model who was working in Thailand.



Ashley Morgan Smithline

Nolwen Cifuentes for *Rolling Stone*. Hair and makeup by Brittney Yarborough with Allen Edwards Salon, Woodland Hills, CA.

Smithline describes her personality at the time as “bubbly and effervescent,” immersing herself in local cultures, mingling with anyone, and practicing bikram yoga. “I look for the good in everyone and want to believe that everyone has good intentions,” Smithline tells *Rolling Stone*. “I was very vulnerable and susceptible to anyone showing care, love, and a feeling of safety.”

Soon after they met online, Warner told her she “was the perfect girl for him,” according to [Smithline’s lawsuit](#). “[He’d say], ‘I’m the only one who understands you,’” she tells *Rolling Stone*. “There’s a lot of things that should’ve been huge warning signs, but when you’re naive, you just think it’s ‘kindred spirits.’” Warner flew her to Los Angeles, and Smithline quickly found herself moving into his apartment.

According to a statement by Warner, who has denounced her accusations as lies, their relationship, “to the limited extent it was a relationship, lasted less than a week in 2010” and was consensual. Smithline, however, claims that the two had a consensual sexual relationship that lasted until November 2010, when, she alleges in the suit, she “awoke from unconsciousness with her ankles and wrists tied together behind her back and Mr. Warner sexually penetrating her. Ms. Smithline told Mr. Warner to stop and said ‘No’ multiple times, and Mr. Warner told her to ‘Shut the fuck up’ and ‘Be quiet.’”

According to the lawsuit, Warner choked, strangled, bit, and burned Smithline without consent “for [his] sexual gratification,” and raped her “several times.” Over the course of their time together, the suit claims, Warner, without Smithline’s consent, carved the initials “MM” on her thigh, “threw a Nazi knife at Ms. Smithline, only barely missing her face,” “cut Ms. Smithline while she was raped” with “a knife emblazoned with a swastika,” and elbowed her in the nose, causing a hairline fracture. (In his own court filing this June, Warner denied virtually all of the claims made in Smithline’s suit.)

Years before *Game of Thrones* fans knew her as Ros, Esmé Bianco was an aspiring actress and burlesque performer who was friends with Warner’s then-fiancée, Von Teese. Warner told Bianco he was interested in casting her in a Lewis Carroll-themed horror film called *Phantasmagoria*.

What she characterizes as love bombing — the act of showering someone with praise and gifts to manipulate them for future control — began immediately. “I was flattered,” says Bianco, who had liked his music as a teen. “Literally the first words out of his mouth were, ‘I’ve been a fan of you for years.’ . . . Now I look back and call bullshit.”

Bianco and Warner were friends for four years before their relationship turned romantic. “My relationship with him started out glorious,” she says now. “There’s a lot of glamour that comes with dating somebody like that, and at first it feels fantastic. You don’t realize that it’s not fantastic until it’s way too late.”

According to Bianco’s suit accusing Warner of rape, sexual battery, and sex trafficking, Warner flew her from the U.K. to Los Angeles in February 2009 for a never-released video for “I Want to Kill You Like They Do in the Movies.” Among other alleged horrors, the suit claims he plied her with drugs and alcohol while withholding food, “beat her with a whip that Mr. Warner said was utilized by the Nazis,” and “electrocuted her.” Their relationship, according to the suit, included a nightmarish pattern of drugs, constant monitoring, physical abuse, and sexual assault. (Warner, in response, has dismissed “each and every” allegation from Bianco as “untrue and meritless.” He also moved to throw two of her claims out of court due to the statute of limitations, but the judge denied that motion.)

By 2011, Bianco had secretly started to look for apartments to move into. “I thought that if I physically left, that magically all our problems would go away,” she says. Even when the alleged ax incident occurred shortly before their breakup, Bianco still blamed herself for Warner’s behavior. “You truly think that everything is your fault,” she says. “So even if someone is trying to kill you, you’re like, ‘What did I do to make them so mad?’”



Sarah McNeilly
Erin Kirkland for Rolling Stone

Sarah McNeilly met Warner that same month. The Los Angeles model was upset over a breakup, and her roommate at the time had encouraged her to go to a party at the Chateau Marmont and find someone new. She met Warner that night, and when she woke up the next morning, she saw numerous messages from him asking her out. “I was like, ‘Oh, my God. I’m never drinking tequila again,’” she says. “‘No, thank you. I’m sure you’re a wonderful guy, but I don’t want to date any more musicians.’ And he replied: ‘I’m not a musician. I’m a magician.’”

She acquiesced, and Warner invited her over to his home to watch a movie for their first date a week later, she says. “He was super-charismatic, warm, and inviting,” McNeilly tells *Rolling Stone*. “He went the extra mile to try to get you to trust him. He seemed very vulnerable. But it was also learning about me, what made me tick and where he could pull the strings out later.”

McNeilly says she first noticed something was off when Warner told her he loved her during sex shortly after they met. “I stopped and I was like, ‘What the fuck did you just say to me?’” she recalls. “Like, we’ve been dating a week.... He wanted me to start picking out wedding dresses. He wanted to have a baby. I’ve never experienced a relationship like this — because it was fucking fake.”

Soon, McNeilly says, Warner began isolating her from her loved ones, threatening and verbally berating her for hours on end. (McNeilly's friend Brittany Leigh confirms that McNeilly told her about the alleged abuse and isolation at the time.) McNeilly's voice quivers as she describes the time when, she says, he sent her to the "Bad Girls' Room" after he heard the name of another musician she'd dated in the past and "flipped the fuck out." "That was absolutely terrifying, because by then, the mask is off and you can see what he's capable of," she says.

The most violent incident, she alleges, occurred during the singer's video shoot for 2011's "Born Villain," directed by Shia LaBeouf. McNeilly says she had been helping Warner pick out pants for the shoot when he became enraged. "He threw me up against the wall, and he had a baseball bat in his hand, and he said he's gonna fucking smash my face in," McNeilly says. "The physical violence was almost a relief. Like, the mental shit that he puts you through, that he infects your brain with, that he brainwashes you, you just want it to stop."

Like many of Warner's accusers, Ashley Walters says her initial contact with him was positive, beginning when he reached out to her on Myspace in the spring of 2010 to praise her photography. Her legal filing states he invited her to his West Hollywood home for a photo session that turned ugly when he allegedly "pushed her onto his bed and pinned down her arms" and "bit her ear while grabbing her hand and placing it in his underwear."



Ashley Walters
Christopher Lanier*

Walters has said she tried to block out the incident, and that Warner deluged her with adoring text messages soon afterward. That August, she became his personal assistant. At industry events, Walters' lawsuit alleges, Warner would "offer her up" to his friends, encouraging her to "please his friends in whatever way they desired." He allegedly threw dishes at her, pushed her into a wall, and at one point, according to the suit, broke down a door when she refused to come out of a room. (In court, Warner's lawyers have said he "categorically denies each and every allegation.")

In the weeks after Bianco's and Walters' lawsuits, one of Warner's ex-girlfriends, identified in court papers only as a musician named Jane Doe, filed yet another lawsuit for sexual assault and sexual battery, accusing Warner of subjecting her to "further degrading acts of sexual exploitation, manipulation, and psychological abuse."

Doe's complaint alleges that she met Warner in February 2011 at a pre-Grammy party. Two weeks later, he allegedly told Doe he loved her and wanted a "serious, monogamous relationship." This led to incessant texts and calls, demands that she be nude, and food deprivation, according to her court filings. "Warner told Plaintiff that because she was his girlfriend, she needed to lose weight because her weight embarrassed him," Doe's suit says. (A judge dismissed Doe's suit due to the statute of limitations but allowed her to file an amended complaint. The case is currently pending. A lawyer for Doe declined further comment.)

"Coercive control cannot be underestimated," Bianco says. "There is no consent when you think you might be killed or raped if you don't do what you're told and you're locked in somebody's bedroom."

In her suit, Doe details claims that "Warner began demanding [she] not move a muscle during sex. He ordered her to lie on top of him and stay perfectly still, or else he would scream at her." Their sexual encounters, she alleges, became "increasingly violent." "He would grab her extremely forcefully," the suit says. "At one point, Warner bit Plaintiff on her neck exceedingly hard.... One time after seeing Warner, Plaintiff remembers that the left side of her chest and neck had turned completely black with bruises he had inflicted on her."

Doe claims in the suit that Warner once "forced [her] to perform oral sex on him" while she cried. On a subsequent visit to his apartment, Warner "forcibly pushed her to the ground," the suit says. "With her face down on the carpet, and his hands on top of her, Warner raped Ms. Doe," the court filing states. "He was saying that she had driven him crazy, and she was making him do this to her. Warner was wearing black jeans under a kimono, and Plaintiff remembers seeing them around his ankles as she looked back during the rape. Afterward, while standing in the doorway, he said to her: 'Don't you ever fucking make me do that to you again.'"

Following the alleged assault, Doe says, Warner threatened to kill her, saying he would “bash her head in” and boasted that he could “get away with” murdering her “because she was a ‘nobody’ and he was a celebrity who had contacts with the police.” (Warner’s lawyers have denied all of Doe’s claims in court.)

Multiple people who knew him say Warner was a master of cult-like mind-control techniques, such as asking his employees, girlfriends, and hangers-on to monitor one another and report any dirt back to him. “You couldn’t trust anyone,” says one source. Drugs were everywhere: “Anybody that was in his inner circle knew that he was probably doing, like, an eight-ball a day and drinking absinthe and various pills,” the source adds. “He offered [cocaine] like hors d’oeuvres.”

His accusers claim that the drugs, far from being recreational, were often used as another means of control, evoking interrogation methods that have been denounced as torture by human rights groups. Both Smithline’s and Walters’ legal complaints accuse the musician of forcing them to stay awake by giving them cocaine and, according to Smithline’s suit, “depriv[ing] her of sleep and food in order to weaken her physically and mentally and decrease her ability to refuse him.... Between the sleep deprivation, drug use, and malnourishment, Ms. Smithline’s weight dropped to approximately 80 pounds.”

On tour, sources say, he was just as erratic. Warner attacked bassist Fred Sablan, threw his mic stand into Jason Sutter’s drums, and treated his own crew recklessly. “One time in Vegas, he had this prop mirror,” remembers a source who was on tour with Manson around 2012. “It didn’t work the way he wanted it to, and he took the microphone stand that weighed 60, 70 pounds, and he tried to smash through it. The stage manager was standing behind it, and it knocked him out; he had to go to the hospital.”

During one show circa Warner’s Rape of the World Tour in 2008, former keyboard/guitar tech and assistant Dan Cleary says Warner punched him in the back of the head with no explanation or apology. “He hit me hard. He was just laughing after it,” Cleary says. “It knocked me off my stool, and I see him scurrying away to get back onstage.” (A spokesperson for Warner did not deny the incident, but said: “It’s important to note that the events in question happened onstage during a rock & roll show.”)

Many of his associates, including his employees, say that Warner attempted to wear them down through intimidation. “Everybody received a text from him at some point that was like, ‘Do not fuck with me,’” says one source. “He would tell [a former assistant], ‘Do not look at me. I will fucking kill you. I will kick you out of the circle, and no one will care about you.’”

Around the time of 2015’s *The Pale Emperor*, Marilyn Manson’s critically acclaimed comeback album, Warner invited *Rolling Stone* to his home, which he then shared with model and photographer Lindsay Usich (whom he went on to marry in 2020). He was no longer living above the liquor store, but he still kept the thermostat at a chilly 65 degrees; a wall sported a painting by murderer and rapist John Wayne Gacy, and he displayed an

unused canister of Zyklon B, the gas Nazis used to murder Jews during the Holocaust. “It was weird,” one source remembers. “I saw him show it off to Jewish friends of his, like, ‘Check this out.’”

In 2017, Jessicka Addams, of the provocative alt-rock group Jack Off Jill, accused former Marilyn Manson band member Jeordie White of physical abuse and rape when they were in a relationship two decades earlier. (“I do not condone nonconsensual sex of any kind,” White said in a statement at the time.)

That same year, a reporter asked Warner for his thoughts on the #MeToo movement, which had begun to bring down men like Harvey Weinstein. “If you have something to say, you should say it to the police, not to the press,” Warner said. “That’s what I would do.” The movement, he warned, “could ruin a lot of people’s lives that don’t need to be ruined.”

By 2018, Wood was ready to share her tale of abuse with the world. That February, she spoke to the House Judiciary Committee in support of the Survivors’ Bill of Rights Act. “My experience with domestic violence was this,” Wood testified without naming Warner. “Toxic mental, physical, and sexual abuse, which started slow, but escalated over time, including threats against my life, severe gaslighting and brainwashing, waking up to the man that claimed to love me raping what he believed to be my unconscious body, and the worst part, sick rituals of binding me up by my hands and feet to be mentally and physically tortured until my abuser felt I had ‘proven my love for them.’”

“In this moment, while I was tied up and being beaten and being told unspeakable things, I truly felt like I could die, not just because my abuser said to me, ‘I could kill you right now,’” she continued, “but because in that moment, I felt like I left my body and I was too afraid to run — he would find me.”

Wood’s testimony made her a prominent advocate for survivors of sexual assault, and in 2019, she spoke before the California Senate Public Safety committee on behalf of the Phoenix Act, a bill she co-created with Bianco that extends the statute of limitations for domestic-violence survivors to pursue charges against their abusers.

“When Evan and I first realized that very similar things had happened to both of us, we went to seek justice and were told it was too late,” Bianco says. “We decided to write a law.... I think I called every single member of the California Legislature and told them my story.”



Esmé Bianco
Nolwen Cifuentes for Rolling Stone

When Bianco testified before the California Assembly in 2019 in support of the Phoenix Act, she detailed her allegations without naming Warner. “The physical violence was most often disguised in acts of intimacy, and was not consented to,” Bianco testified. “I was bitten until my body was covered in bruises; on another occasion cut with a knife during sex. He took photos of my naked, mutilated body and posted them online without my knowledge.”

“When it comes to the criminal justice system, survivors have practically no control over the process,” Bianco tells *Rolling Stone*. “I fully intend to pursue every avenue I have, because that’s how I take my agency back. I’m standing up and saying, ‘No, you don’t get to just walk away from that.’”

“Pursuing a civil lawsuit allows a survivor to take control of the narrative,” says Jay Ellwanger, the lawyer representing three accusers. “Regardless of what the criminal justice system does, a survivor can seek justice on her own terms and try to get her life back.”

Some of Warner’s recent band members remain loyal to the musician. “I never witnessed any kind of abuse in any setting,” claims guitarist Rob Holliday. “Manson is a sweet, misunderstood outcast.” Tim Skold, who is currently writing new music with Warner, says the allegations don’t reflect the man he worked with in the mid-2000s or now: “If you’re asking me if I saw any aggression or abusive behavior, I did not.”

Warner's publicist offered *Rolling Stone* interviews with five defenders of Warner — including people like Manzin, a performance artist who befriended the singer in the mid-2000s. “He’s always been a supportive, wonderful friend,” he says. Greta Aurora, who says she had a consensual sexual encounter with Warner in 2011, says that she received an email from a friend of the accusers — whom she calls “self-proclaimed victims” — asking if she wanted to listen in on last year’s support group. She declined.

Even as speculation grew online that Warner was Wood’s alleged abuser, the traditional media remained largely silent. Virtually no major outlets prior to 2020 directly referenced or alluded to the accusations against him in their profiles, interviews, or album reviews.

In September 2020, U.K. metal magazine *Metal Hammer* became the first outlet to ask Warner what it was like to be implicated in Wood’s testimony. He hung up on them. Two months later, his U.K. representative issued a broad denial: “Unfortunately, we live in a time where people believe what they read on the internet, and feel free to say what they want with no actual evidence.”

Wood ended the years of speculation on Feb. 1, 2021. “The name of my abuser is Brian Warner, also known to the world as Marilyn Manson,” she wrote on Instagram. “He started grooming me when I was a teenager and horrifically abused me for years. I was brainwashed and manipulated into submission. I am done living in fear of retaliation, slander, or blackmail. I am here to expose this dangerous man and call out the many industries that have enabled him, before he ruins any more lives.” Walters, Smithline, and McNeilly were among several women who went public with abuse allegations against Warner the same day as Wood’s post.

Warner attempted a rebuttal that evening. “Obviously, my art and life have long been magnets for controversy, but these recent claims about me are horrible distortions of reality,” he wrote in his own Instagram post. “My intimate relationships have always been entirely consensual with like-minded partners. Regardless of how — and why — others are now choosing to misrepresent the past, that is the truth.”

Later that week, stylist Love Bailey recalled her own traumatic experience with Warner on Instagram. Bailey was in her early twenties in 2011, when she says she was invited to Warner’s home for a photo shoot. Bailey, who is trans, said that Warner took out an unloaded gun, put it to her forehead, and said, “I don’t like faggots,” then laughed before pulling the trigger. “The thought that crossed my mind was ‘Am I going to die?’” Bailey tells *Rolling Stone*. “He’s too famous to kill me, right?” (Warner has denied Bailey’s allegations.)

The retribution that followed for Warner was swift, if partial. Loma Vista, the record label that distributed 2017’s *Heaven Upside Down* and last year’s *We Are Chaos*, stopped working with Warner, as did his booking agency, CAA. TV shows *American Gods* and *Creepshow* removed his planned appearances, while Ciulla, Warner’s longtime manager, finally dropped the musician as a client.

On Feb. 19, the Los Angeles Sheriff's Department opened up a domestic-violence investigation against Warner covering the years 2009 through 2011. (A representative for the department declined to comment on the status of the investigation.) But despite radio stations significantly reducing his airplay since the accusations hit, his streaming numbers have remained steady at about 5 million per week.

Warner has kept a low profile in recent months, responding to court documents but rarely showing up at events. In August, however, he made a surprise appearance at Kanye West's Chicago listening party for his album *Donda* alongside rapper DaBaby (who was widely condemned for homophobic remarks at a show weeks earlier). Dressed in all black with a horizontal line of dark makeup under his eyes, Warner paced around a replica of West's home while nodding along to the music.

Now 52 and embroiled in multiple sexual-assault lawsuits, the musician seemed to view the appearance as a comeback, aligning himself with West, hip-hop's biggest provocateur. When West released the album two days later, Warner appeared on "Jail, Pt. 2," singing "Guess who's goin' to jail tonight?/God gon' post my bail tonight" alongside West. Weeks later, Warner — once famous for rejecting Christianity — appeared again with West at the devoutly religious rapper's "Sunday Service" livestream, this time with Justin Bieber by their side.

Smithline watched Warner's appearance at the album launch with disgust, and says it helped drive her to an eating-disorder relapse. "It was just such a kick in the teeth," she says.

Sarah McNeilly thought Warner would have to be dead before she publicly accused him of abuse. "This is the most terrifying thing I've ever done," she says. Years after their relationship ended, she still wonders: If she posts something online, will it get back to him? Could he retaliate? "I've been afraid for 10 years," she says. "Some of these girls who came out and it happened to them five years ago, God bless them. Because five years after [our relationship ended], I was a shell of a person. He took everything from me and then spit me out.

"I don't know what kind of pain he's in," she adds. "But he just wants to make people feel that pain over and over again."

Smithline says she started mentally suppressing what she'd experienced in the relationship after leaving Warner. "It's all I could do to survive." She felt "powerless and disgusting." She'd curl up in a ball to cope. Her weight plummeted; she eventually required an IV and feeding tubes. She went through "radical, 'round-the-clock therapy."

"I started to [feel] smaller and smaller and quieter and quieter," Smithline says. "When you're silenced or locked in a box where no one can hear you, you really start to think about how small and unimportant you are. I just didn't want to speak anymore."

Like other Warner accusers, she says, she suffers from post-traumatic stress disorder and still has panic attacks. But she's trying to find strength and relief in other people who tell her she's given them the power to leave an abusive relationship. She's thought about someday going to schools and teaching students about sexual assault and abuse. "If any good can come of this horrific thing," she says, "I hope I can help other people."

Bianco, too, says she deals with the aftereffects of her relationship with Warner on a daily basis. "By far, the psychological abuse has been the hardest to recover from," Bianco says. "I blamed myself for everything. Getting past the guilt and the shame and gaslighting has been incredibly difficult."

She says she's had to deal with death threats from Manson fans, people showing up at her home, and a car waiting outside her house for days. On some days, she still asks herself, "Why have I done this?"

"I really just have to hold onto the fact that if nobody speaks up, then nothing changes," Bianco says. And while Warner is not currently facing any criminal charges for his alleged sex crimes, she adds, "nothing could be a better outcome for me than him spending the rest of his life in jail."

Other people in Warner's orbit have declined to participate in this story, citing their fear of Warner and the need to protect their own mental health. "That's in part why he got away with it for so long: Because victims of his felt completely ashamed that they still didn't realize what was happening to them until it was way too late," Bianco says. "He told the whole world and nobody tried to stop him."

If you or someone you know is experiencing relationship abuse, help is available. The National Domestic Violence Hotline provides free, confidential support 24/7/365. Text "START" to 88788, call 1-800-799-SAFE (7233), or chat online at [TheHotline.org](https://www.thehotline.org).

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EXHIBIT 2

Senate Bill No. 273

CHAPTER 546

An act to amend Section 13519 of, and to add Section 803.7 to, the Penal Code, relating to domestic violence.

[Approved by Governor October 7, 2019. Filed with Secretary
of State October 7, 2019.]

LEGISLATIVE COUNSEL'S DIGEST

SB 273, Rubio. Domestic violence.

Existing law prescribes various statutes of limitations for criminal acts, ranging from a requirement that prosecution commence within one year after commission of the offense to provisions authorizing prosecution to be commenced at any time for offenses punishable by death or imprisonment for life in the state prison. Existing law makes the infliction of corporal injury resulting in a traumatic condition upon specified victims, including, among others, the offender's spouse or former spouse, punishable by imprisonment in the state prison for 2, 3, or 4 years, or in a county jail for not more than one year, or a fine of up to \$6,000, or by both that fine and imprisonment.

This bill would authorize prosecution for that crime to be commenced within 5 years. The bill would apply to crimes that are committed on or after January 1, 2020, and to crimes for which the statute of limitations that was in effect prior to January 1, 2020, has not run as of January 1, 2020. By extending the statute of limitations indefinitely, under certain circumstances, for a crime, the bill would impose a state-mandated local program.

Existing law requires the Commission on Peace Officer Standards and Training to implement a training course for law enforcement officers in the handling of domestic violence complaints and to develop guidelines for officer response to domestic violence. Existing law requires the course to include instruction on specified procedures and techniques for responding to domestic violence, including techniques for handling incidents of domestic violence that minimize the likelihood of injury to the officer and that promote the safety of the victim, and the assessment of lethality or signs of lethal violence in domestic violence situations. Existing law also requires the course of instruction, the learning and performance objectives, the standards for the training, and the guidelines to be developed by the commission in consultation with appropriate groups and individuals having an interest and expertise in the field of domestic violence, including 2 domestic violence experts.

This bill would require those techniques for handling domestic violence to include methods for ensuring victim interviews occur in a venue separate

from the alleged perpetrator, deescalation techniques, and specified questions for victims. The bill would require the course of training to include the signs of domestic violence and current and historical context on communities of color impacted by incarceration and violence. The bill would authorize the training experts to include victims of domestic violence and people who have committed domestic violence and have been or are in the process of being rehabilitated. The bill would also expand the groups and individuals with whom the commission is required to consult to include one representative of an organization working to advance criminal justice reform and one representative of an organization working to advance racial justice.

The bill would include a statement of legislative findings and declarations. The bill would also delete obsolete provisions and make other technical changes.

The California Constitution requires the state to reimburse local agencies and school districts for certain costs mandated by the state. Statutory provisions establish procedures for making that reimbursement.

This bill would provide that no reimbursement is required by this act for a specified reason.

The people of the State of California do enact as follows:

SECTION 1. This act shall be known, and may be cited, as the Phoenix Act.

SEC. 2. The Legislature finds and declares all of the following:

(a) More than one in three women and one in four men in the United States have experienced rape, physical violence, or stalking by an intimate partner in their lifetime.

(b) One in five female high school students report being physically or sexually assaulted by a dating partner.

(c) Many perpetrators of domestic violence were themselves abused.

(d) Better education and resources can help prevent domestic violence from occurring.

(e) When domestic violence occurs, the statute of limitations varies depending on the crime committed, and can be as short as one year.

(f) Victims may not report a crime for myriad reasons, including their age at the time of abuse, ongoing trauma, threats from the perpetrator, or lack of evidence.

(g) Without resources or any intervention, many perpetrators of domestic violence will abuse multiple partners.

(h) It is the intent of the Legislature to allow for victims of domestic violence to come forward by extending the statute of limitations in order to ensure those victims see justice.

(i) It is the intent of the Legislature to increase training for law enforcement to ensure victims are protected and to prevent future domestic violence from occurring.

SEC. 3. Section 803.7 is added to the Penal Code, to read:

803.7. (a) Notwithstanding any other law, prosecution for a violation of Section 273.5 may be commenced within 5 years of the crime.

(b) This section applies to crimes that are committed on or after January 1, 2020, and to crimes for which the statute of limitations that was in effect prior to January 1, 2020, has not elapsed as of January 1, 2020.

SEC. 4. Section 13519 of the Penal Code is amended to read:

13519. (a) The commission shall implement by January 1, 1986, a course or courses of instruction for the training of law enforcement officers in California in the handling of domestic violence complaints and also shall develop guidelines for law enforcement response to domestic violence. The course or courses of instruction and the guidelines shall include a brief current and historical context on communities of color impacted by incarceration and violence, enforcement of criminal laws in domestic violence situations, availability of civil remedies and community resources, and protection of the victim. If appropriate, the training presenters shall include domestic violence experts, who may include victims of domestic violence and people who have committed domestic violence and have been or are in the process of being rehabilitated, with expertise in the delivery of direct services to victims and people who have committed domestic violence, including, but not limited to, utilizing the staff of shelters for battered women in the presentation of training.

(b) As used in this section, “law enforcement officer” means any officer or employee of a local police department or sheriff’s office, a peace officer of the Department of Parks and Recreation, as defined in subdivision (f) of Section 830.2, a peace officer of the University of California Police Department, as defined in subdivision (b) of Section 830.2, a peace officer of the California State University Police Departments, as defined in subdivision (c) of Section 830.2, a peace officer, as defined in subdivision (d) of Section 830.31, or a peace officer as defined in subdivisions (a) and (b) of Section 830.32.

(c) The course of basic training for law enforcement officers shall include adequate instruction in the procedures and techniques described below:

(1) The provisions set forth in Title 5 (commencing with Section 13700) relating to response, enforcement of court orders, and data collection.

(2) The legal duties imposed on peace officers to make arrests and offer protection and assistance including guidelines for making felony and misdemeanor arrests.

(3) Techniques for handling incidents of domestic violence that minimize the likelihood of injury to the officer and that promote the safety of the victim. These techniques shall include, but are not limited to, the following:

(A) Methods for ensuring victim interviews occur in a venue separate from the alleged perpetrator and with appropriate sound barriers to prevent the conversation from being overheard.

(B) Questions for the victim, including, but not limited to, the following:

(i) Whether the victim would like a followup visit to provide needed support or resources.

(ii) Information on obtaining a gun violence restraining order and a protective order described in Section 6218 of the Family Code.

(C) A verbal review of the resources available for victims outlined on the written notice provided pursuant to paragraph (9) of subdivision (c) of Section 13701.

(4) The nature and extent of domestic violence.

(5) The signs of domestic violence.

(6) Criminal conduct that may be related to domestic violence, including, but not limited to, any of the following:

(A) Coercion, as described in paragraph (1) of subdivision (h) of Section 236.1, for purposes of committing or impeding the investigation or prosecution of domestic violence.

(B) False imprisonment, as defined in Section 236.

(C) Extortion, as defined in Section 518, and the use of fear, as described in Section 519.

(D) Identity theft, as defined in Section 530.5, impersonation through an internet website or by other electronic means, as defined in Section 528.5, false personation, as defined in Section 530, receiving money or property as a result of false personation, and mail theft.

(E) Stalking, as defined in Section 646.9, including by telephone or electronic communication.

(F) Nonconsensual pornography, as described in paragraph (4) of subdivision (j) of Section 647.

(7) The assessment of lethality or signs of lethal violence in domestic violence situations.

(8) The legal rights of, and remedies available to, victims of domestic violence.

(9) The use of an arrest by a private person in a domestic violence situation.

(10) Documentation, report writing, and evidence collection.

(11) Domestic violence diversion.

(12) Tenancy issues and domestic violence.

(13) The impact on children of law enforcement intervention in domestic violence.

(14) The services and facilities available to victims and batterers.

(15) The use and applications of this code in domestic violence situations.

(16) Verification and enforcement of temporary restraining orders when (A) the suspect is present and (B) the suspect has fled.

(17) Verification and enforcement of stay-away orders.

(18) Cite and release policies.

(19) Emergency assistance to victims and how to assist victims in pursuing criminal justice options.

(d) The guidelines developed by the commission shall also incorporate the factors described in subdivision (c).

(e) Local law enforcement agencies are encouraged to include, as a part of their advanced officer training program, periodic updates and training on domestic violence. The commission shall assist where possible.

(f) (1) The course of instruction, the learning and performance objectives, the standards for the training, and the guidelines shall be developed by the commission in consultation with appropriate groups and individuals having an interest and expertise in the field of domestic violence. The groups and individuals shall include, but shall not be limited to, the following: one representative each from the California Peace Officers' Association, the Peace Officers Research Association of California, the State Bar of California, the California Women Lawyers, and the State Commission on the Status of Women and Girls; two representatives from the commission; two representatives from the California Partnership to End Domestic Violence; two peace officers, recommended by the commission, who are experienced in the provision of domestic violence training; two domestic violence experts, recommended by the California Partnership to End Domestic Violence, who are experienced in the provision of direct services to victims of domestic violence; and at least one representative of service providers serving the lesbian, gay, bisexual, and transgender community in connection with domestic violence. At least one of the persons selected shall be a former victim of domestic violence; one representative of an organization working to advance criminal justice reform; and one representative of an organization working to advance racial justice.

(2) The commission, in consultation with these groups and individuals, shall review existing training programs to determine in what ways domestic violence training might be included as a part of ongoing programs.

(g) Each law enforcement officer below the rank of supervisor who is assigned to patrol duties and would normally respond to domestic violence calls or incidents of domestic violence shall complete, every two years, an updated course of instruction on domestic violence that is developed according to the standards and guidelines developed pursuant to subdivisions (a) and (d). The instruction required pursuant to this subdivision shall be funded from existing resources available for the training required pursuant to this section. It is the intent of the Legislature not to increase the annual training costs of local government entities.

SEC. 5. No reimbursement is required by this act pursuant to Section 6 of Article XIII B of the California Constitution because the only costs that may be incurred by a local agency or school district will be incurred because this act creates a new crime or infraction, eliminates a crime or infraction, or changes the penalty for a crime or infraction, within the meaning of Section 17556 of the Government Code, or changes the definition of a crime within the meaning of Section 6 of Article XIII B of the California Constitution.

EXHIBIT 3

Marilyn Manson's Home Raided by L.A. County Sheriff in Sexual Assault Investigation

"There was a search warrant that was served this morning. It's confirmed it was his address, his location," a L.A. County Sherriff's source tells *Rolling Stone*

By **ALTHEA LEGASPI** 



Evan Agostini/Invision/AP

L.A. County Sheriff's investigators raided **Marilyn Manson**'s home on Monday morning, a source in the Department tells *Rolling Stone*. The news comes on the heels of ***Rolling Stone's exposé*** on the singer, whose real name is Brian Warner, and his alleged sexual abuse of multiple women, some of whom accused him of locking women in a soundproof room. Several lawsuits are pending.

Special Victims Unit investigators searched for belongings in connection to the sexual assault allegations against him between 2009 and 2011. "What I can confirm is there was a search warrant

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“On November 29th, 2021, at 7:00 AM, detectives from the Los Angeles County Sheriff’s Department’s Special Victims Bureau served a search warrant at Mr. Warner’s Hollywood area home as part of the ongoing investigation,” the department said in a press release on Tuesday. “Mr. Warner was not home at the time of the warrant service. During the search, detectives seized items such as media storage devices.” The department added that the investigation remains active.

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“Anyone with information about this incident is encouraged to contact the Los Angeles County Sheriff’s Department, Special Victims Bureau toll free tip line at (877) 710-5273 or by email at specialvictimsbureau@lasd.org.” Reps for Manson did not immediately respond to *Rolling Stone’s* request for comment.

In *Rolling Stone’s* exposé, several women including model Ashley Morgan Smithline, said they were forced to stay in the soundproofed space, which was described as the size of a department-store dressing room, for hours. *Game of Thrones* actress Esmé Bianco alleges that Warner frequently abused her verbally; deprived her of sleep and food; bit, cut, electrocuted, and whipped her without her consent; and raped her during their two years together.

step towards making sure Brian Warner is held to account, Guy Litwarger, the attorney representing Bianco and Smithline, tells *Rolling Stone*.

Additional reporting by **Nancy Dillon**

In This Article: Marilyn Manson



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EXHIBIT 4

Courtney Love Dishes Dirt at ROCKRGRL Conference

ROCKRGRL Q&A session finds Love sounding off on Durst, Eminem, rap and the music industry

By **STEVE BALTIN**

After two very successful days, the only thing the first annual **ROCKRGRL** Music Conference (held in Seattle Nov. 2-4) seemed to be missing was that big-name headliner to put it over the top. Enter **Courtney Love**. Conference attendees were informed of a rare Q&A session with Love Saturday morning, as signs around the conference area announced the event, which would take place at six that night, as “just added.”

Love would later say that she had been planning to appear at the seminar for some time, but she failed to make her plans public because she didn’t want to be in the advertising, instead choosing to let the “conference build on its own.” While the early morning buzz on her appearance at the very indie-oriented event was only marginal, Love’s Q&A session proved to be the hottest ticket of the symposium by the time six o’clock rolled around. A line to get into the ballroom where she would be speaking wound around all the way through the lower level of the Renaissance Madison Hotel. Several fans were turned away at the door, but were later let in after Love and **ROCKRGRL** editor/founder Carla DeSantis could hear those who were left on the outside chanting, “Let the rocker girls in.”

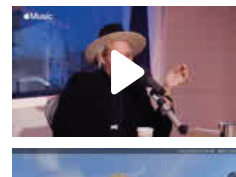
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DeSantis joked about all the commotion at the previously low-key convention, saying, “Do you think we’ve got a name here?” Though the build-up to her arrival was high-maintenance, the actual hour-and-a-half session itself was very informal.

Wearing an orange T-shirt and blue pants, Love came into a standing ovation, sat down behind the podium and seemed immediately relaxed. Billed as a Q&A, the session was to feature Love answering written questions submitted throughout the day by attendees. However, she decided after looking at the first couple of questions to instead converse directly with the audience.

Love thrived under the informal format, proving funny, confident, easy-going, surprisingly open and, of course, controversial. Among the early questions was a lengthy one on how Love and her like combat the image of Britney Spears. Rather than feeding into the conference mentality of us vs. them, Love shrugged it off, praising songwriter Max Martin as “a genius” and saying Spears was “like a Barbie.” She added that their respective fields are very different, saying, “We’re here, a group of women and sympathetic men, because we make rock music.”

She also related her current frustration at trying to find a bass player for Hole, saying, “I’ll hire a woman over a man any day” (to great applause from the audience), “but women tend to not be

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Love dealt with a lot of questions about women and their role in music, but she also dished a lot of dirt. Here’s what she had to say on a variety of topics:

*On **Eminem*** — “I was asked about him earlier. And you’re not going to like my answer but I said, ‘Where’s the female one?’ That’s my f—ing answer . . . He’s the first totally post-modern artist, in that without context he’s nothing. Without that endorsement [from Dre] he’s nothing.”

*On **Marilyn Manson*** — “[Interscope head] Jimmy Iovine asked me, ‘Why doesn’t Manson sell?’ Because it’s not 1975, Jimmy.”

On Iovine — “He’s a little troll. Stevie Nicks used to date him. I called Stevie and I’m like, ‘Stevie, what was that?’”

Rap — “There’s no room for females, white or black, in rap.”

On balancing her creative and business sides — “It’s really tough. I’ve only written about five songs in a year because of the legal battles I’m going through now. It takes all your time and energy.”

On the perception of her as a bitch — “I’ve always liked the words ‘bitch’ and ‘slut’ . . . If you play rock you’re a bitch.”

On PJ Harvey — “I tried to engage her in a conversation about the business recently. She was like this [*puts hands over ears and head down*]. Some people just don’t want to know. Michael Stipe, it’s the same thing.”

On her past — “I was a reforming heroin addict. [*Sarcastically*] I don’t know how many of you knew that, but don’t tell anybody. Nobody’s supposed to know.”

On ambition — “I’m grandiose. I’ve wanted to be a rock star since I was two. I hope you all did too.”

On groupies — “There’s nothing wrong with groupie f—ing. But there is something wrong with taking underage, frail girls from the audience who didn’t come there for that. When I was on tour with Trent Reznor, people were like, ‘Oh you’re obsessed with Trent. Oh, you’re stalking Trent.’ No, if he had taken one more overweight, fragile girl whose stepfather was raping her from my audience, I was going to kick his ass.”

On acting — “It’s a nice middle-class job if you can get it. But it’s not as true and spiritual as playing music.”

*On **Fred Durst*** — “Fred calls me up and he’s like, ‘You’re always saying I’m going out with *Playboy* playmates. That’s not true. I’m fascinated by you.’ Fred and I have gone on three dates [*boos, sounds of disgust from audience*]. The only thing that makes Fred feel guilty is he wants to be part of the Lollapalooza generation. They romanticize this. He’ll call me up and say, ‘I want to respect women. How do I do that?’ I said, ‘Fred, for starters, holding a party at the Playboy Mansion? Not a good idea.’”

EXHIBIT 5

Manson † Wiki

The Marilyn Manson Encyclopedia

Video Interview: Marilyn Manson Dinner For Five

From MansonWiki, the Marilyn Manson encyclopedia

From the Independent Film Channel, Dinner For Five with Marilyn Manson, Andy Dick (http://en.wikipedia.org/wiki/Andy_Dick) ,

Daryl Hannah (http://en.wikipedia.org/wiki/Daryl_Hannah) (Bladerunner), and Jon Favreau (http://en.wikipedia.org/wiki/Jon_Favreau) .

Amongst the humour of Manson & Dick, Manson speaks on topics such as Luis Buñuel (http://en.wikipedia.org/wiki/Luis_Buñuel) , a surrealist film director, who directed the film *Ensayo de un crimen* (The Criminal Life of Archibaldo de la Cruz) (1955)

(http://en.wikipedia.org/wiki/Ensayo_de_un_crimen) , Pay-Per-View pornography, details on Manson's film *Groupie*, his autobiography, lucid dreaming, creative writing, absinthe, and much more. Taped on January 13, 2002, aired on May 6, 2002 [1][2]



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Dinner for Five with Marilyn Manson[[edit](#)]



DINNER FOR FIVE

(The show begins with everyone talking about who to call as the fourth guest was unable to attend, and they show a graphic of a black screen with white text to inform the television audience of this)

Andy: Well, I'll start calling at that point, dude. At that point, I'll start calling.

Daryl: We're at that point, so you should start calling (laughs).

[GRAPHIC]: At the last minute, one of our guests was unable to attend.

Andy: But we're not filming right now.

Jon: Yes, we are.

Manson: Can you do, it's like in high school and you're out and you're like, "Hey, do you got a cute friend for one of us?" Can you do that type of thing?

Jon: Well, Daryl's calling Tim Curry. Who do you wanna call?

Andy: Tim Curry?!

Jon: Yeah.

Daryl: Can I borrow one of your phones?

Andy: Yours real quick... [unintelligible] --- (Andy possibly asking Manson for his phone number)

Manson: There's a little theme developing then with the Tim Curry dresses up in the women's clothes...

Andy: Tim Curry? You gotta call Tim Curry.

Manson: ... and Marilyn Manson and Andy Dick. It's a little un-heavy on the girl side.

Andy: I'm calling Tony Kaye.

Jon: You're gonna call Tony Kaye?

Andy: Do you know him? ...

Manson: Is he straight?

Jon: No, let's call Tim Curry.

Daryl: But I have no phone.

Andy: ... Director of American History X.

Manson: (to Andy) Name-dropper.

Jon: (looking through someone's cell phone) Tommy - Tommy Lee? Is this your celebrity page?

Manson: Do you think he'll get his dick out? --- (in reference to Tommy Lee)

Andy: Call Tommy Lee. Call Tommy Lee.

Daryl: No, he lives really far away.

Andy: No, in Malibu... call him anyway. I wanna talk to him. I wanna talk to him. I have to...

Manson: You wanna see his ding-ding?

Andy: Shut up!

Jon: Yes.

Manson: I'm asking. You've seen it.

Andy: We've all seen it. Rick James!

Manson: RICK JAMES could get the party started!

Andy: Okay.

Manson: I got Rick James' number too, but on my cell phone, like I need to call him real quick. It's an emergency. I better call Rick James. . .

Andy: No, no, no. You don't understand. No, no, no. We're friends, for reasons I don't want to get into. Don't make that call.

Manson: . . . I've got a hooker tied up. What do I do?

(Everybody laughs)

[GRAPHIC]: SPRINGTIME FOR HITLER

Jon: (to Daryl, about Andy) I love your show. And you know, there's this channel, a music channel: MTV...

Andy: Have you heard it? The music television.

Daryl: Yes. Jon: He has a - he has a show where...

Daryl: I actually heard that you ran around New York naked and you couldn't get arrested. That's what I heard.

Andy: I think that was - that might've been Tom Green. That doesn't sound like me.

Manson: And he mocks me on the show, on two separate episodes.

Jon: On the show? That's right, you dressed up like...

Manson: Twice.

Jon: What was the character you played?

Andy: Him! I played him, as Marilyn Manson.

Manson: Me. Me as Mary Poppins.

Jon: You playing who?

Andy: Manson as...

Manson: (finishing Andy's sentence) ... as Mary Poppins.

Andy: 'Cause rockers are doing Broadway. Like that guy from, uh, Def Leppard. Or I don't remember, Motley Crue or something.

Manson: Yeah, they wanted me to do... I was gonna do The Producers - Springtime For Hitler.

Jon: They wanted you to be in that?

Andy: (laughing) They probably did!

Jon: As the director?

Manson: No, no, no, no. They were doing a 50-Years-of-Broadway celebration, but it was before the thing in New York happened...

Jon: Right.

Manson: ... so they kinda, I guess, postponed it.

Andy: Yeah.

Manson: But they said I could pick any number, and I wanted to do the Springtime For Hitler piece 'cause I thought it was kind of a more music thing...

Jon: Yeah, sure, sure.

Daryl: Before it was called The Producers, it was called Springtime For Hitler.

Jon: The whole movie?

Daryl: Yeah.

Manson: It's a snappier title. But it doesn't go over well with everyone.

Daryl: My father was a real estate man, but he was sent it to produce. And it was called Springtime For Hitler. And he was a Russian Jew, so he just threw it away immediately, and then it ended up being his favorite movie.

Jon: That's so funny.

[GRAPHIC]: CURSE OF THE JADE SCORPION

Andy: I do find it hard to read. I went to, um, I saw Curse of The Jade Scorpion. No, I do. The subtitles.

Manson: I like all those weird...

Andy: In Barcelona, right?

Manson: Mm-hmm.

Andy: And it was subtitled in Spanish. And I got to watch it.

Jon: And everybody else is...

Andy: And I watched all the other people, but they know English so well. I mean...

Jon: Do they?

Andy: The Spaniards. Are you Spanish?

Jon: No, I'm not. Everybody, basically everybody other than - every European knows English better than we know their language.

Andy: They do. Well, yeah. It's very true. And they loved it! First of all, it was Sunday night, 10 o'clock at night, like now. Like Sunday at 10, at night, and it was packed. I had to sit in the last row. But the movie, they loved it. They loved it. They laughed at every line. They love Woody Allen, and then I heard that he was just there.

Jon: They like him more there than they like him here, I think.

Andy: Oh yeah, they were - they ate every line up. They laughed, "Ho, ho, ho, ho, I'm a Spaniard!" I mean, literally, it was like...

Jon: Yeah.

Andy: They step over.

Manson: I liked the uh, Sweet and Lowdown.

Jon: I liked that one too.

Andy: I liked that one too, a lot.

Jon: Although I guess they didn't get along too well on that one, right?

Andy: Who?

Jon: Sean...

Andy: Sean Penn?

Jon: Yeah, they didn't get along very well.

Andy: He didn't tell me that.

Jon: I don't know.

Andy: I ran into him, but I never - I met him one time, Sean Penn.

Jon: I've met him, but the last thing I would do is like, talk shop with him.

Andy: I did.

Jon: 'Cause you get the sense he doesn't like talking shop, even when he's supposed to.

Andy: I did. I hung out with him for hours though, at The Standard. And he was, you know, having a few cocktails and he didn't mind talking shop. I just wanted to know - (laughs) - just 'cause it's me. I'm like, "Did you do drugs during this movie? Were you high during this one?" That's what I wanted to know. I mean, "Nicholson, is he really like, coked up all the time?"

Jon: It all relates to drugs for you?

Andy: (laughs)

[GRAPHIC]: BUÑUEL

Manson: Buñuel did this movie called The Criminal Life of Archibaldo de la Cruz. And it's about this little boy that gets this gift from his mother. And she tells him that if he plays it, it's a music box - it can make someone die. And then she dies right after she gives it to him. And so he grows up, and it's real perverse 'cause he has like, this foot fetish. And the director has - they just put out a book about Bunuel and it's about how he has these fetishes in all of his movies.

Jon: Uh huh.

Andy: I think the director Todd Phillips has a foot fetish. I'm serious, I'm not making that up.

Manson: Very, very, creepy, strange Spanish director. He's my favorite: Buñuel. I just really got to appreciate the nuances of older films. A different style of acting, a different style of directing, and storytelling. But especially Spanish movies...

Jon: You're into that?

Manson: ... they have a serious, different sense of humor that I really like.

Daryl: Yeah.

Jon: Yeah.

Daryl: Great sense of humor.

Manson: I really like.

Jon: Why? What's different about it?

Daryl: But don't you think, too, that when you read subtitles, sometimes you can - you can project a little bit about how the performances are? (laughs)

Jon: I think very much so.

Manson: Yeah, I always wondered about that. It's hard to decide if the person's a good actor or not 'cause you're not - unless you understand the native tongue.

Daryl: Because I remember one time seeing something that was dubbed. And I mean, it was just the most unwatchable film that I've ever seen.

Jon: Right.

Daryl: And partly because it was dubbed. But also, then you're much more aware of the acting because you're watching their faces rather than subtitles...

Jon: Right, right, right.

Daryl: ... and then referring back up.

Manson: Right.

[GRAPHIC]: SHREK

[unintelligible]

Daryl: But I hears just recently that, for example, that Blockbuster is having real trouble, and the independent world is changing a lot.

Andy: Blockbuster's having trouble? What? What? What?

Daryl: They were having big troubles until Shrek.

Jon: Why, 'cause they made so much money?

Daryl: Yeah, Shrek rented a lot, but otherwise it's going out of business because of all the, you know, satellite channels...

Jon: Oh, right, right.

Daryl: ... and DVD, and...

Manson: I gotta tell you my biggest complaint with Direct TV, and this happened to me again last night. What happens is, and I'm an idiot because I have a DVD player. And I've got the porno DVDs, you know, stashed. Fortunately, I keep - I don't keep 'em in the bedroom. And if I'm a little drunk, I'm a little lazy, I just go for the Direct TV. \$10.99.

Jon: Mm-hmm.

Manson: Problem is, you switch it on, it's like four in the morning, and it's in between. There's some bullshit conversation going on, there's no penetration. So you go and you switch it and you order another one. And then you got like, a weird, like, sports-oriented, like - a bunch of real husky guys.

(Everybody laughs)

Manson: So, I'm flicking between them, I'm toggling, just trying to get some, one second of penetration.

Andy: What are you looking for? Just a little mix? Or just straight - just straightforward? Or a little mix-y?

Manson: Just a girl spreading her legs at any point's gonna work for me. (to Daryl) I'm not offending you, am I?

Daryl: No, it's okay.

Andy: (laughing) They're not gonna use any of this.

Manson: So, I ended up spending \$25 last night.

Jon: 'Cause each time you toggle, it goes to another...

Manson: It goes to another cost.

Jon: If it's \$10.99 each, why is it \$25?

Manson: You know what the worst thing is? Half the time, if I'm real determined, I don't even get to the opening credits, and I'm done. You should be able to get a refund back. I do that at hotels though, 'cause at hotels, they give you five minutes, and I'm just like a - I'm just like a lightning bolt.

Jon: You just sample it? You say, "I didn't really want that one."

Manson: Yeah. Sometimes just reading the titles will work. And you're really, really desperate.

Andy: Bullshit.

Jon: Speaking of which, I was just in Vegas yesterday for the porn Oscars.

Manson: Mm-hmm.

Andy: Oh, what are those called again?

Jon: The AVN Awards.

Andy: Did you present?

Daryl: Were you presenting?

Jon: No.

Andy: (laughing) Then why were you there?!

Jon: I'm writing a movie - I'm rewriting a movie called Porn Star. A romantic comedy about...

Andy: Oh yeah. I know about that. Oh yeah.

Jon: So, one of the scenes takes place at these awards, and the person who's consulting on the film...

Andy: Is Ron Jeremy.

Jon: (laughs) ... is from one of the video companies. So, I was there for the whole porn awards. But the best thing is that they announce all the titles. And they have different categories.

Andy: (laughing) I love the titles to porn movies.

Jon: But they have like, Best Fetish Film. And one of the movies, I think the funniest one, it was called Toe Story.

Manson: Oh, I get it. It's subtle, but it's nice.

Jon: It's like Toy Story, but it's...

Manson: You don't have to explain it. I got it.

Jon: To you, I don't.

Manson: To me, I know. I liked Edward Penishands.

Andy: One of my favorite ones ever, is Hill Street Blacks.

Manson: It's not really funny, but it's... odd.

Jon: It's a good play on words.

Andy: As if putting 'black' in the title makes it instantly --- (Andy's laughing too much to finish his sentence, then says something unintelligible)

Manson: It should've been like, Dick Street Blues or something.

Andy: (laughing) Oh, I know!

[GRAPHIC]: BLADE RUNNER

Manson: I used to, at one point, wear the Blade Runner-style makeup.

Daryl: Did you?

Jon: Her - Pris's makeup?

Manson: Yeah, yeah.

Jon: Wow.

Manson: I wore that in The Beautiful People video, and that was my homage to her.

Daryl: When I screen-tested for that movie, there were like five different girls screen-testing for my part. And we all got, like several days to come up with our look. And everybody created a different, you know, thing. And most of the girls were sort of space-age with little lightning bolts and really cute, and mannequin-like, or you know, beautiful. And I made myself into Nosferatu, you know, like a freak...

Manson: Oh, that's cool. That makes it even cooler.

Daryl: ... with the punk hair, and the thing. And when I saw everybody at the lunch, I was convinced that I had made myself into a hideous cartoon that wouldn't get the part.

Jon: Little did you know.

Daryl: And I started crying. I was like, "Oh, no. I've totally fucked it up." You know? And I did gymnastics in my audition and rolled my eyes back, and all this stupid stuff that ended up in the movie.

Manson: Yeah, that had such an impact on me when I saw it.

Jon: I know, me too. And I was like at that age too where I was like, I totally - I had like, the hugest crush on you from that.

Daryl: On me?

Jon: On that. It shows where my head was at.

Manson: It was like a Direct TV type of thing.

Jon: They didn't have Direct TV. It's kinda - it is kinda.

Andy: That's why you're sitting next to her. That's why you're sitting next to her.

Jon: (to Daryl) Did you know that it was gonna be like this - how cool the movie was gonna be just when you were working on it?

Daryl: It was like, um, it was one of my first movies and I really thought that that's what - that's what I expected film-making to be like and what I thought it was gonna be like, but...

Jon: Right, right.

Daryl: ... from then on, it never really was again.

Jon: Why? Because they collaborated with you to such an extent?

Daryl: It was collaborative. It was, I mean, even the screen test...

Manson: It was so grand looking.

Daryl: ... we had smoke, we had sets, we had lights, we had incredible D.P. It was...

Jon: It was Ridley Scott, right? Right at the beginning of his career?

Daryl: Yeah, it was Ridley Scott who had, you know, been an incredible art director.

Jon: Right.

Daryl: So, I mean, the visuals were just amazing, even for the screen tests. And I'd always studied things about the golden years of film-making; the '30s and '40s, so I didn't really know that they'd been making, you know, Logan's Run and a bunch of like, you know, '70s and pre-'80s movies and stuff.

Jon: Well, I had read - you did an article for I don't know what magazine it was. I read it on a plane, about Dancing At The Blue Iguana. And you had said it was the first role you had done where you had collaborated to that extent since Blade Runner. And Blade Runner didn't seem like a collaborative type of effort. It seemed like a really...

Daryl: Well, Blue Iguana was completely improvised. There was no script. It wasn't even like a Mike Leigh film. You know who Mike Leigh is?

Andy: Mike Leigh? No, who is he?

Jon: Naked. Secrets & Lies, right?

Daryl: British filmmaker.

Andy: Naked, and what?

Jon: Secrets & Lies?

Daryl: Secrets & Lies, Naked...

Jon: They like, rehearse with a cast and they...

Daryl: They have a structure and they improvise.

Andy: Like John Cassavetes.

Daryl: Yeah. That's why I loved Dancing At The Blue Iguana because it wasn't - it was a film made by the British director Michael Radford, who did Il Postino.

Jon: Mm-hmm.

Daryl: And he, it was, it had no structure though. It wasn't even like, you know, there was no idea other than it took place in a strip club. And then everything was improvised from there. Everything...

Andy: Wow, I love that.

Jon: Yeah, that's pretty cool.

Daryl: ... the characters, our storylines, everything. So it was really - it was fun. Whether it made it a good film or not is subjected.

[GRAPHIC]: PETTING ZOO

Daryl: (to Manson) Your music is hard to get for independent films though, because we tried to get some of it for Blue Iguana, and they were like, "Not a chance."

Manson: Yeah, I would much rather actually create music for a movie, than to take a song that - you know, because...

Daryl: If people knew that.

Manson: ... I'm such a fan of movies that I'd like marrying the two together rather than taking something...

Daryl: Yeah, that exists.

Manson: Obviously, you can take a song and it'll work with the sentiment you're trying to make in a movie.

Jon: Right.

Manson: (to Jon) I'm sure you've picked music for your movies.

Jon: Yeah. A lot of times, there's like - music is a great shorthand to get a point across. Especially if there's a song that makes you feel a certain way.

Manson: Right.

Jon: A lot of times, you'll cut it to that soundtrack...

Manson: Nostalgia, and things like that.

Jon: ... or just because the mood is so right on. I mean, we had a stripper scene in Made and you know, we picked - we used Monster Magnet. We ended up using that band because it had a very heavy - 'cause it is true what we're talking about. The strippers now, there's a different sound. It's not fun - they like the - it's either Hip-Hop or like heavy Rock.

Manson: Dark.

Jon: Dark, slow Rock.

Manson: Dracula music.

Daryl: Heavy music.

Jon: (to Daryl) You were saying that you were doing research for Blue Iguana. (speaking to Manson and Andy Dick now) She did research. She had to - she went to Jumbo's. You know Jumbo's Clown Room?

Andy: Clown Room. I've been there.

Jon: Which is probably the roughest spot.

Andy: They've got - those strippers, they just don't care. I remember seeing a girl - I went there and there was a girl and she must've been in her 50's, maybe even 60, and she was naked. Everything was just hanging and she was just like (Andy stands up and gyrates), "When's my break?" She was doing (he continues gyrating). She was all - she was all over it.

Manson: I can tell you, hands down, the best place, which I would've told you if I would've known you were doing this thing, is a place in Portland, OR called the Acropolis Steakhouse.

Daryl: (laughing) Why?

Manson: It's called the Acropolis Steakhouse. You go there and they've got these weird little corrals, and they're wooden, and they have little - like how you put the money in for the peanuts, like at a petting zoo. But in the corrals, are girls. They don't have a DJ - they just have a boombox. And the girl puts her own CD in - she's doing her dance and her thing, and then the song stops, and she's totally naked. Everything's going on, you're eating a \$5 steak. And it's not a topless bar, it's totally nude. So you've got, you know...

Jon: What's the petting zoo, coin-operated vending machine for?

Manson: That's what I wanted to know.

Andy: It's to eat.

Manson: I didn't know if it was for the customers or you're supposed to feed the girls...

Jon: (laughs) That's so awful.

Manson: ... instead of money.

Daryl: It's for tips.

Manson: Yeah.

Daryl: The thing is, a lot of the clubs, like even Jumbo's. I mean, they're just - they're just topless or bikini bars, and you know.

Manson: That doesn't make too much sense.

Jon: Which I like better, to be honest with you.

Manson: Oh, I like burlesque stuff.

Jon: I don't like it at all - I don't want it all nude.

Manson: I like burlesque.

Daryl: Burlesque is entertaining.

Jon: It doesn't get me any more excited. I like it actually - women seem to feel more comfortable, I think, when they're wearing something.

Manson: I don't get excited by strip bars because I never would buy into the fact of the whole...

Jon: They really like you?

Manson: ... the lie that you're trying to buy into.

Jon: That they like me?

Manson: I mean, but for me, man - if I'm on tour, I can go to a strip bar.

Daryl: They do - they do like rock stars. They would like you.

Manson: I mean, if I wasn't myself, it would be different. But I could go to a strip bar and I have taken home girls from strip bars. But normally, I wouldn't buy into the lie, you know? I wouldn't sit there and give a girl money.

Jon: Right.

Manson: I'll wait until at least you're engaged to them and then you're forced to give them money, than to just give them money without any sort of promise, or note, or anything.

Jon: That's kind of cynical.

Manson: It is a little bit cynical.

[GRAPHIC]: GO TIGERS!

Andy: (to Jon) You and I have improvised together and that's how - I love it. I love it. I improvise on my show. It's so fun.

Daryl: Oh, it's so much...

Andy: It's like Christopher Guest.

Jon: Yeah, he's...

Daryl: Yeah, I worked with him too. He's great.

Jon: Yeah? What did you work with Chris Guest on?

Daryl: You know what? He directed, um, Attack of The 50 ft. Woman that I did for cable.

Jon: Oh, right.

Daryl: But it wasn't an improv thing...

Jon: No.

Daryl: ... but that was before he...

Andy: Oh, he directed that?

Daryl: Yeah.

Andy: Oh, that's so cool.

Jon: But that's sort of like, probably in the period where he was figuring out that he shouldn't be doing movies this way. Andy: What his style is.

Daryl: Exactly.

Jon: Everybody goes through that sort of transition period.

Daryl: Yeah.

Jon: And fortunately - and a lot of them, their best work is in that transition, that when they finally go full-on to what they're into... it gets too esoteric. But I think with him...

Daryl: His full-on is...

Jon: ... his full-on is like really entertaining. (to Andy) You went to Second City.

Andy: Yes.

Jon: You were in Second City in Chicago.

Andy: Well, I took classes there, then I joined the troupe out here, in L.A.

Jon: Yeah.

Andy: The touring company. You were in the touring company also.

Jon: I never made the touring company. I was a dishwasher, in Chicago, but you had left already. (to Daryl) He was in an improv group before I was there, and he had left. But he was like the big star that had left Improv Olympic to move on to big movies.

Andy: It's always that way. I'm always like the guy - and then all my friends surpass me. He's like a big filmmaker now. Look at Jack Black.

Jon: Jack Black's doing really well.

Andy: He's kicking ass. It's like everybody's kicking ass.

Jon: But he's not from - is he from Chicago too?

Andy: No, but I've been out here...

Daryl: (to Jon) You're from Chicago?

Jon: I moved to Chicago for like four years, to do improv.

Daryl: But you're not from there.

Jon: I'm from New York.

Daryl: From New York.

Jon: Yeah.

Daryl: (to Andy) Where are you from?

Andy: I guess Chicago.

Daryl: I'm from Chicago.

Jon: (to Manson) You're from Canton, right?

Manson: I'm from Canton, OH originally, yeah.

Jon: Go Bulldogs.

Andy: I really lived in the suburbs of Chicago - Joliet.

Manson: That was - see, I would've went to McKinley, but my parents sent me...

Jon: Did you see Go Tigers!, by the way?

Manson: I have it. I didn't watch it yet.

Jon: Oh, you gotta see this.

Manson: About the Massillon Tigers.

Jon: Yeah. There's this movie called Go Tigers! about this huge cult, sort of, high school football rivalry between Massillon, OH and Canton, OH where they have a Vegas line, and if it's as crazy as it is in the movie, that must've been some place to grow up.

Manson: And the weird part for me was that my parents sent me to private Christian school. They weren't religious, they just wanted me to get a better education. They didn't even have a team, so I was just like the kid that all the sports guys wanted to beat up. I had a different school bus that I got off. It wasn't the 'short bus', but it was different. So, I would get my ass kicked on a regular basis (laughs).

Andy: I read - I read his book before I met him. I was just fascinated by it.

Daryl: (to Manson) You wrote a book?

Andy: Yeah, an autobiography. You know, about himself. It's fascinating. You should read it.

Manson: Yeah, back in '97.

Andy: But then you told me you made some of that up.

Manson: No, I said I had to change names and places and I had to combine stuff so that I wouldn't get in trouble.

Daryl: So the guys didn't come back and kick your ass again.

[GRAPHIC]: GROUPIE

Manson: I won't go into the details of this film...

Andy: I will.

Manson: ... but I made this movie that I had intentions of putting onto my home video, not thinking that it would offend my own...

Jon: So, what was the scenario? You gotta slow down for me.

Manson: It was like a party at my house.

Jon: It was a real party, and you were taping with a real camera?

Andy: Yes, a video camera.

Manson: I said, "A girl's gonna show up, and then something's probably gonna go wrong, and you guys just roll with it."

Andy: And she comes over...

Manson: But nobody knew.

Andy: "Ding dong" - They're doing crap and drugs and weird shit. You - Twiggy - no, wait. Oh, that's right... you sucked Twiggy's cock on the video. On the video, you sucked Twiggy's cock.

Manson: There was a dispute over...

Andy: But he put a rubber on it.

Manson: And it was flaccid. It was flaccid.

Andy: Which was even gross. And it was soft, so it was disgusting. It was one of the freak shows. It's totally not - you know, it's great TV. It's great film. It's a film. We have to release this.

Manson: It wasn't just horseplay. The movie did scare the shit out of you though.

Andy: It did scare the shit - 'cause then, "Ding dong!" They're having fun, sucking each other's cocks, and then "Ding dong!" - "Ding dong!", who's at the door? A fan. "I just know that you live here and I made this..."

Daryl: A hired fan.

Andy: "... piece of art for you. Will you take it?" And you're like, "Sure. Why don't you come in?" And he pulls this - she must've been 18, literally.

Manson: Less, more, I don't know. For the purpose of the...

Andy: Less?! It better not be less, or you're in trouble!

Manson: No, no, no. She was portraying a youngster in the film. No, it was...

Andy: Well, she looked 18. She looked hot...

Jon: So, you made your own porn video.

Andy: ... she had the black hair...

Manson: No, no, it wasn't a porn video. It was not a porno.

Jon: You were blowing your bass player, but it wasn't porn?

Andy: ... It'd be like if you took Daryl and cut her hair and made it all black and weird bangs, and you were all Gothic.

Manson: I wasn't blowing my bass player. You're making this sound like a pornographic film.

Andy: No, it wasn't.

Manson: It was not a pornographic film.

Andy: They were having fun - it was a party. It honestly looked like someone left the camera on.

Manson: Yeah.

Andy: 'Cause at times, it looked like you just set it there.

Jon: Sort of a Blair Witch feel.

Andy: Yeah.

Manson: It was before Blair Witch. I didn't see Blair Witch when I did it.

Jon: Okay.

Andy: This girl shows up and he lures her in. And she's, you know, excited to be there. She's like, "I'm such a big fan. I'm really excited." And then slowly, but surely, over time, and very subtly, he starts to get her to do certain things. And those are things that you know, maybe we shouldn't really discuss. But it gets...

Manson: No, but it gets really scary and everyone in the room didn't know whether I was kidding or it was a joke or not.

Andy: Wait, wait, wait. Let me describe the first thing he tries to get her to do. He tries to get her to drink Pogo's urine.

Manson: Yeah.

Andy: He pees in the wine glass, and then she's like, "You do it!" And he drinks it. And then - and then she finally does do that. But then there's other things that you don't want to know.

Manson: I introduce a gun into the situation. And it becomes really scary...

Jon: Okay.

Andy: It's disturbing.

Manson: ... and I showed it to him. And he...

Andy: It was disturbing. I was disturbed...

Manson: It wasn't a pornographic film. But that was MY independent film.

Andy: ... if you can imagine that. No, people start bleeding at some point, and there's not good things happening...

Manson: A fight breaks out...

Andy: That girl is tied up by the end, and crying.

Manson: Well, don't tell the end of the story.

Jon: (laughing) Don't ruin it.

Manson: That was my independent film for ya.

Andy: That, all my friends...

Daryl: Did you get it distributed?

Manson: No, because when I showed it to my manager, he said, "Please hide the masters. If anyone sees this, you'll go to jail, and your career will be over."

Daryl: What's it called?

Manson: It was called Groupie.

[GRAPHIC]: SHAKESPEARE IN LOVE

Manson: I'm gonna admit to a crime that I've done. I don't know if this is a felony or a misdemeanor.

Andy: I'll tell you. I'll know.

Manson: But when you guys were talking about Blockbuster.

Jon: (laughs to Daryl) He brings us back to your thing.

Manson: Now, uh, I got a copy of Black Inches. This is a year or so - probably statute of limitation's up. I took out some Black Inches. I took out a couple of the choice photos from Black Inches. You know, black gentleman posing like this and show their inches or, you know, what have you. 'Cause it's self-explanatory.

Andy: Why do you get that magazine?

Manson: Because I have a purpose! Let me explain. So, I went - and this is right at the time when Shakespeare in Love came out. I went into Blockbuster and took carefully-folded pictures from Black Inches and I inserted them...

Daryl: Oh my god, it's a blowtorch! (in reference to the woman lighting Andy's cigar)

Manson: ... into rental copies of Shakespeare in Love, so that people that would rent Shakespeare in Love would take it home and they'd get an extra little surprise.

Jon: Maybe that's why it won the Oscar.

[GRAPHIC]: WORMWOOD

Manson: Ever use the William S. Burroughs style of writing? See, I like to write fiction.

Andy: What's that? Do a bunch of drugs?

Daryl: No, you cut and paste...

Manson: Yeah, that's a good way of it too.

Daryl: ... You cut little pieces of magazines, and any words that sort of have any kind of impact to you. It's a great way of writing.

Manson: It's cutting and pasting words, and then you create from it. But what I actually do is slightly different than that. I don't take...

Jon: But what does he do though? He just grabs words...

Daryl: It's like a Ouija board. You take any kind of...

Manson: He would cut stuff out of newspapers. He would jumble it up and make sentences.

Daryl: Yeah, and then you sort of Ouija it around.

Manson: And then you would take that, and you kinda go off of it.

Jon: Oh, I see.

Daryl: It's amazing though how it always gets to exactly what's going on with you. But how do you do it differently?

Manson: I don't do it by cutting up newspapers. I just have different phrases. Throughout the day, I'll just write down a phrase, and it may not have any relevance until later.

Daryl: Do you mix - do you move around where the positions of those phrases?

Manson: Yeah, yeah.

Daryl: It works really well though, doesn't it?

Manson: Yeah, but if you get that mixed up with like, your laundry list and girls' phone numbers, you come up with a real confusing...

Jon: Subliminal messages in your writing.

Manson: Yeah.

Andy: The only technique that I've used...

Manson: I don't have a laundry list. I've never washed my clothes in my life.

Andy: Don't you want to hear my technique?

Manson: I just wanted to clarify that I don't have a laundry list. I don't know what that is. I just said it to try and be 'normal'.

Andy: The only technique I've ever used, I thought I made it up, but then I heard that it's actually somebody did it a long time ago, like Plato or somebody like that.

Manson: Doggy-style?

Andy: No, I - no, Ben Franklin, I think. I know there's a lot of years in between those two (laughs).

Jon: One of those guys.

Andy: But either way, it's when you're about - you're falling asleep. Right before you fall asleep.

Manson: Lucid dreaming?

Andy: Yeah, where you're still kind of awake and have these wild thoughts.

Daryl: Your mind is so open, yeah.

Andy: What he would do is, he'd hold a bell, and then right when he got there, the bell would drop, and it would wake him up and he'd remember all that and write it down.

Manson: Oh, that's good.

Andy: And I've done that.

Jon: I would go the other way.

Manson: I keep a notebook by my bed.

Jon: Yeah. When I have writer's block, that's the best way for me to get over it - is as soon as you wake up in the morning, and you're sort of not all there yet - you just get on the computer and start to write.

Andy: Yeah.

Jon: And the first page is crap, but it gets you, you know - you get some momentum going.

Manson: I write - I have very bizarre dreams. I write 'em down a lot. But I drink absinthe a lot. And before I go to bed, and that's very...

Daryl: Hallucinatory.

Andy: You do? No, you don't drink the real thing. You can't get it here.

Jon: It's the new absinthe.

Daryl: You CAN get it here.

Manson: I don't get it here.

Andy: You can't get the real one.

Daryl: You CAN get the real one.

Manson: I don't get it here!

Andy: The real one is aged with wormwood and it has, like, a hallucinogenic...

Manson: Do you wanna listen to me? Do you wanna behave?

Andy: Go ahead.

Manson: I don't get it here. And I have a wormwood plant, so I have real absinthe, and I have wormwood. And it's not as...

Daryl: Potent.

Manson: ... dangerous as the old absinthe because the old absinthe was just distilled improperly. But no, it's very inspiring though, as far as like - it does make you - it's not like just getting drunk.

Daryl: It's hallucinatory.

Andy: There's a book out that I just bought, I'm not kidding about this. It's called Writing on Drugs. And it's about getting high and then writing. I was fascinated by that.

Manson: There's another...

Andy: Everybody's writing starts out real fun, from what I've been reading in this book. And there's some brilliant writers who did absinthe and hardcore, like - like shooting up and heroin and opium, and all this stuff.

Jon: Right.

Andy: And all their writing starts out almost brilliant, and sometimes they're - they become brilliant, very, very famous writers, but then their writing slowly becomes about...

Manson: They go crazy.

Andy: ... how crazy they're going.

Manson: Yeah.

Andy: And they finally become obscure, and people don't like the writing at all.

Manson: That's where I'm at right about now.

Andy: And then they drop off and mostly die. (to Manson) That's where you're at?! (claps and laughs)

[END CREDITS ROLL... but the conversation continues]

Daryl: I assumed that this show was something about independent film-making, and it's not. I keep trying to draw the subject matter back to independent film (laughs).

Jon: [unintelligible]

Andy: He's trying - he's trying his fucking damndest to make it about independent films. But then, you know, you get interesting people together, we're gonna talk about - well, I'd like to talk about sex.

Trivia[edit]

Andy Dick played a parody of Manson on MTV's The Andy Dick Show.

The film The Criminal Life of Archibaldo de la Cruz by Luis Buñuel, focuses on a would-be serial killer whose plans, although elaborate, never result in an actual murder.

In the lyrics for Unkillable Monster Manson alludes to Luis Buñuel's film El Ángel Exterminador (The Exterminating Angel)

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Note[edit]

Transcription thanks to Unpretty Unsafe

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Groupie (Partially Found Late 90s Short Film by Marilyn Manson)

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DISCLAIMER: This article (or part of it) deals with Violent, Sexual Drug-Related Content. Viewer Discretion is Advised.

Groupie is a partially-lost 1996 short film, created by rock music star Marilyn Manson. Sometime in '96, Marilyn Manson held a house party, which he intended to make a short film out of. He informed the guests that a woman would be arriving, and that he would be filming her.^[1]

Groupie (Partially Found Late 90s Short Film by Marilyn Manson)

status **Partially Found**

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Plot

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condom. The groupie arrives, and is invited inside (Manson has previously implied that she was an actor portraying a fan, and knew roughly what she was in for).

They make her do increasingly perverse things from drinking Stephen Bier's (also of Manson's band) urine, which she does, but only after convincing Manson to also drink it. The rest of the details are relatively unknown, although she is tied up at one point, with bloodshed and a gun supposedly having been involved. The guests at the party were said to have been made uncomfortable by the incident, as they didn't know if it had genuinely happened, or had been previously planned.

Reception

Just three people have been known to have ever seen *Groupie*; Tony Ciulla, Andy Dick, and Marilyn Manson himself. Ciulla begged Manson to prevent the public distribution or public viewing of *Groupie*, citing fears that it would be considered sufficient evidence to convict Manson if a criminal case was ever brought against him. Dick acknowledges that the participants were enjoying the session at the time of filming, even despite the gruesome subject matter. However, Dick did not deny being disturbed by the film.

Discoveries

The film has never been released, although a few short segments of it appeared at the end of Manson's video album *Dead to the World*. The segment shows a tied-up woman in a chair, with Manson offscreen. He then intimidates her into repeating the phrase "Jesus loves me because the Bible tells me so". There is currently no other footage of the short film available to the public.

References

1. My sleepover at Marilyn Manson's house. (<http://www.theguardian.com/music/musicblog/2007/aug/14/mysleepoveratmarilynmanon>) The Guardian. August 14, 2007. Retrieved April 22, 2015.

]

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Add a comment about Groupie (Partially Found Late 90s Short Film by Marilyn Manson)

17 comments



TwisteeTurn • 6/1/2021

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4. Suicide Video



Thebiggestfail • 8/14/2021

*Obscene Porno



LimpBrizkit • 9/11/2021

Not even really a porno



Write a reply



Jamesandedward7 • 5/19/2021

Why is this the most popular page all of a sudden?



Jasher martinez • 5/19/2021

The world may never know



Soph07 • 5/27/2021

Because a lot of stuff about Manson just came out. there is a warrant for his arrest right now. Also, a girl he abused just came out about it, and what she said sounds like this video. Her name is Esme Bianco.



Write a reply



LimpBrizkit • 4/27/2021

Ok what happened



-Stxrlight777- • 5/30/2021

@Gabbyrose23 vandalized it and tried to make it kid friendly



LuLuLovesChuChu! • 6/12/2021

Yeah @Gabbyrose23 Did



ChrisGriffin3 • 6/12/2021

We Know That Happened



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Charleysheenisdumb • 3/16/2021

Rob zombie: Makes movie

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RoseDiamond95 • 2/20/2021

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Charleysheenisdumb • 2/10/2021

It's almost found

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Reptilian 1567 • 4/23/2021

Same here

Reptilian 1567 • 4/26/2021

There has been alot of controversy with him like mental abuse alligations i kind of find it hard to beleive because he was abused as a kid

TomHoppusBarker • 4/28/2021

I know, I don't believe those allegations either.

LimpBrizkit • 11/30/2021

I like rob zombie more than marlyn

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Bvbnb • 1/28/2021

Oh dear god....

Reptilian 1567 • 3/1/2021

What

Write a reply

Charleysheenisdumb • 12/20/2020

Where's the movie I clicked on it and it said the video is taken down because the channel was terminated...

TSLJ • 1/6/2021

The entire discovered clip is at 3:46 in this youtube video. <https://youtu.be/t2UQG745A3s?t=226>



Lost In The Shadows EP.1 - Marilyn Manson's Unreleased Short Film "Groupie"
YOUTUBE

(Edited by TSLJ)

Charleysheenisdumb • 1/6/2021

Thanks I really want it to be found I like Manson

Soph07 • 5/27/2021

I think honestly it is better off lost. it sounds very abusive and wrong and not like something that anyone should watch.

Write a reply

Doctor Professor Switzerland Man • 7/30/2017

what if this is all a found footage style movie

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Manson is known for doing stupid/weird shit just to make everyone uncomfortable, so I don't think it was made for that intent.

 Ronaldmcfreekingdonald • 12/12/2020

I looked up on the internet if he has killed anyone but I don't want to trust google

 ChaiTea8 • 2/7/2021

He has

 LimpBrizkit • 11/30/2021

That's Charles Manson not Marilyn Manson

 Write a reply


 Awesomeface101 • 4/29/2015

to be honest, i wouldnt be surprised if the whole video was just a stunt the dude did to piss people off, i mean the guy is known for doing shit to make people uncomfortable.

 Charleysheenisdumb • 12/20/2020


To be fair it's marlyn Manson

 Write a reply

 A Fandom user • 1/28/2015

Would it be bad to find the short buried in some archive and include it on a deluxe CD/DVD edition of *The Pale Emperor*?

 Write a reply


 A Fandom user • 10/5/2014

I think I raped my ears after seeing that groupie scream.

 Write a reply

 BrotherBox • 6/15/2014

How do we know the footage in the end is of the video album really is from Groupie?

 A Fandom user • 10/5/2014

I don't know.

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i thought it was confirmed somewhere

Write a reply



Gibracer • 1/1/2014

I'm pretty much completely desensitized to anything bad on the internet, but this.. This really fucking unnerves me. I would love to see the rest of it, out of curiosity.

Write a reply



A Fandom user • 11/14/2013

Manson is such a cool rockstar, i am naughty to the bone whips, spankings and chains whatever he wants! id love to party with him.

Write a reply



A Fandom user • 10/30/2013

This video should be released and Manson should go to jail.

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A Fandom user • 2/4/2014

Yeah, like you're so like cool and stuff. Can we like, hang out?



A Fandom user • 12/7/2014

If the groupie in the video was held against her will, yes he should. Would you say the same about the lead singer of The Lost Phrophets? Don't know what he did? Google it. You'll regret it.



Charleysheenisdumb • 12/20/2020

Manson should not go to jail, and yes pantera is better than marlyn Manson .



Soph07 • 5/27/2021

He should. To those of you who don't, look up esme bianco and marilyn mansion. Pretty sure she just described the video/his abuse

Write a reply

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START A WIKI

Man seeing that video is very unnerving!



A Fandom user • 1/21/2015



I know! It gives me the chills.



TomHoppusBarker • 2/10/2021



I wanted to watch it... but after seeing the article, and reading some of these comments. I think I'm good. XD



Write a reply



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EXHIBIT 7

1 KING, HOLMES, PATERNO & SORIANO, LLP
HOWARD E. KING, ESQ., STATE BAR No. 77012
2 HKING@KHPSLAW.COM
JOHN G. SNOW, ESQ., STATE BAR No. 280790
3 JSNOW@KHPSLAW.COM
JACKSON S. TRUGMAN, ESQ., STATE BAR No. 295145
4 JTRUGMAN@KHPSLAW.COM
1900 AVENUE OF THE STARS, TWENTY-FIFTH FLOOR
5 LOS ANGELES, CALIFORNIA 90067-4506
TELEPHONE: (310) 282-8989
6 FACSIMILE: (310) 282-8903

7 Attorneys for Plaintiff Brian Warner

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

BRIAN WARNER, p/k/a MARILYN
MANSON,
Plaintiff,
vs.
EVAN RACHEL WOOD; ASHLEY GORE,
a/k/a ILLMA GORE,
Defendants.

CASE NO. 22STCV07568
COMPLAINT
1. Intentional Infliction of Emotional Distress
2. Defamation Per Se
3. Violation of the Comprehensive Computer Data and Access Fraud Act (Penal Code Section 502(c), (e)(1))
4. Impersonation over the Internet (Penal Code Section 528.5(a), (e))
JURY TRIAL DEMANDED

1 **INTRODUCTION**

2 1. This action arises from the wrongful and illegal acts done in furtherance of a
3 conspiracy by Defendant Evan Rachel Wood and her on-again, off-again romantic partner,
4 Defendant Ashley Gore, a/k/a Illma Gore, to ~~publicly cast Plaintiff Brian Warner, p/k/a Marilyn~~
5 ~~Manson, as a rapist and abuser—a malicious falsehood that has derailed Warner’s successful~~
6 ~~music, TV, and film career.~~

7 2. Wood was in a serious romantic relationship with Warner from 2006 to 2010,
8 during which time she soaked up the spirited rock-and-roll lifestyle that came with being Warner’s
9 significant other: “For the first time[,] I really feel like I’m around somebody and in an
10 environment where I can just let go and not worry about being judged.”¹ She was “craving danger
11 and excitement,”² and, as she would later explain, “[b]eing with Manson put my creativity into
12 overdrive.”³ Despite Warner’s public shock-rocker persona, they had, in Wood’s words, a
13 “healthy, loving” relationship.⁴ “This is who I am and this is who I’ve always wanted to be, and
14 I’m finally with somebody who lets me be who I want to be.”⁵

15 3. In the ten years after they split, Wood never once accused Warner of abuse—that
16 is, until she met Gore, a grifter who understood that an organized attack on Warner—~~spearheaded~~
17 ~~by Wood’s own fabricated revelation of rape and abuse~~—could benefit them both. With Gore’s
18 help, Wood could be rebranded, from someone who “still might best be known for dating Marilyn
19 Manson a decade ago,”⁶ into an outspoken standard bearer for victims of domestic violence or
20 sexual assault—thereby absolving her reputation for having a “wild past” and her embarrassment
21 for having been in a long-term relationship with Marilyn Manson.

22
23 _____
24 ¹ <https://people.com/celebrity/evan-rachel-wood-sex-music-video-is-romantic/>.

25 ² <https://www.rollingstone.com/tv/tv-features/evan-rachel-wood-how-wild-past-personal-demons-prepped-her-for-westworld-107632/>.

26 ³ <https://blackbookmag.com/arts-culture/film/hells-angel-devilish-sweetheart-evan-rachel-wood/>.

27 ⁴ <https://people.com/celebrity/evan-rachel-wood-sex-music-video-is-romantic/>.

28 ⁵ <https://www.interviewmagazine.com/music/evan-rachel-wood>.

⁶ <https://www.rollingstone.com/tv/tv-features/evan-rachel-wood-how-wild-past-personal-demons-prepped-her-for-westworld-107632/>.

1 4. ~~To that end, for at least the last two years, Gore and Wood have secretly recruited,~~
2 ~~coordinated, and pressured prospective accusers to emerge simultaneously with allegations of rape~~
3 ~~and abuse against Warner, and brazenly claim that it took ten or more years to “realize” their~~
4 ~~consensual relationships with Warner were supposedly abusive. Wood’s and Gore’s wrongful~~
5 ~~conduct in furtherance of their conspiracy is staggering:~~

- 6 • They impersonated an actual agent of the Federal Bureau of Investigation by
7 forging and distributing a fictitious letter from the agent, to create the false
8 appearance that Warner’s alleged “victims” and their families were in danger,
9 and that there was a federal criminal investigation of Warner ongoing
10 (Attachment A);
- 11 • ~~They provided checklists and scripts to prospective accusers, listing the~~
12 ~~specific alleged acts of abuse that they should claim against Warner~~
13 ~~(Attachments B and C); and~~
- 14 • ~~They made knowingly false statements to prospective accusers (which have~~
15 ~~since been repeated by those accusers in court filings), including the~~
16 ~~defamatory claim that Warner filmed the sexual assault of a minor.~~

17 5. Additionally, in furtherance of their conspiracy, Gore solicited Warner’s personal
18 information (including logins and passwords) from former employees who were entrusted with
19 such information; hacked Warner’s computers, phones, email accounts, and/or social media
20 accounts; created a fictitious email account to manufacture purported evidence that Warner was
21 emailing illicit pornography; and “swatted” Warner just days after Wood suddenly appeared all
22 over the media, in order to draw further unwanted attention to Warner ~~and to the false allegations~~
23 ~~Wood and Gore conspired to have made against him.~~

24 6. The wrongful conduct alleged herein has been invasive, harassing, defamatory, and
25 otherwise injurious to Warner and his career, personal life, and well-being. Accordingly, Warner
26 has brought this action seeking general, special, and punitive damages against Wood and Gore in
27 an amount to be determined at trial, and an injunction preventing their future wrongful conduct.

28 PARTIES

7. Plaintiff Brian Warner, p/k/a Marilyn Manson, is and has been at all relevant times
a California resident, specifically in Los Angeles County.

8. Upon information and belief, Defendant Evan Rachel Wood is a Tennessee

1 resident. Upon information and belief, Wood was a California resident until November 2020, and
2 regularly came to Los Angeles County between January 2019 and November 2021 to conduct
3 business, including on behalf of The Phoenix Act Inc. (the “Phoenix Act”), a California-registered
4 non-profit corporation (entity number C4268311) whose principal place of business is in South
5 Pasadena, California, and of which she is a corporate officer.

6 9. Upon information and belief, Defendant Ashley Gore, a/k/a Illma Gore is a Florida
7 resident. Upon information and belief, Gore regularly came to Los Angeles County between
8 January 2019 and November 2021 to conduct business, including on behalf of the Phoenix Act.

9 **JURISDICTION AND VENUE**

10 10. This Court has jurisdiction over the subject matter in this action pursuant to the
11 California Constitution, Article VI, Section 10. This Court has jurisdiction over Defendants
12 because, on information and belief, they regularly conduct business in this State and the unlawful
13 conduct toward Warner alleged herein predominantly occurred and caused harm in this State.

14 11. Venue in this County is proper because Defendants regularly conducted business in
15 Los Angeles County, the conduct and events giving rise to the causes of action herein occurred in
16 Los Angeles County, witnesses to the events at issue reside or regularly conduct business in Los
17 Angeles County, and the relevant evidence is believed to be located in Los Angeles County.

18 **FACTUAL ALLEGATIONS**

19 12. Wood is a film and TV actress. She and Warner—a musician, writer, filmmaker,
20 and visual artist known professionally as Marilyn Manson—were in a romantic relationship from
21 approximately 2006 until 2010. They were engaged to be married in 2010.

22 13. In 2016, while promoting the HBO show Westworld, Wood told Rolling Stone
23 magazine that she had been raped twice, once “[b]y a significant other while we were together[,]”
24 [a]nd on a separate occasion, by the owner of a bar.”⁷ She did not name her alleged rapists.

25 14. In 2016, Wood became friendly with Gore, a visual artist with a history of trying to
26
27

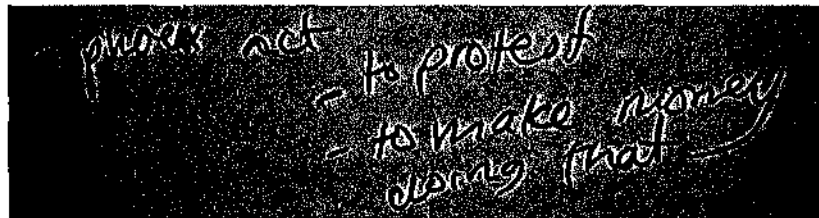
28 ⁷ <https://www.rollingstone.com/tv/tv-features/evan-rachel-wood-how-wild-past-personal-demons-prepped-her-for-westworld-107632/>.

1 get attention by carrying out audacious publicity stunts.⁸ Wood and Gore have been romantic
2 partners since approximately 2019. Upon information and belief, sometime between 2016 and
3 2019, Wood told Gore that she was raped by a significant other (not Warner), but Wood had not
4 and would not publicly accuse this person.

5 15. In February 2018 and in April 2019, Wood gave sworn testimony before the U.S.
6 Congress and the California State Senate in support of proposed legislation with which she and the
7 Phoenix Act were affiliated. She testified that she had been raped once by a significant other and
8 again “by another attacker after hours at a bar,” but she did not name either of them.⁹

9 16. ~~Around this time, Wood and Gore conspired about how Wood and others could~~
10 ~~accuse Warner of abuse.~~ Days before her testimony to the California State Senate, Wood
11 incorporated the Phoenix Act. She serves as its CEO, CFO, and corporate secretary. Gore has
12 been employed by the Phoenix Act since approximately 2019.

13 17. Since at least 2019, Gore has been mired in significant financial troubles. For
14 example, her family members have presented evidence that Gore committed crimes of identity
15 theft by opening credit card accounts in the names of her twin sister and deceased mother; and
16 borrowed money from an elderly family member under false pretenses, claiming that it was to
17 assist with the purchase of a house, which Gore never carried out. Gore wrote in a notebook left
18 with her family that her goal of being involved with the Phoenix Act was to “make money”:



23 18. The Phoenix Act engages in fundraising, including through multiple listings on
24 crowdfunding website “GoFundMe,” where people can donate money to the Phoenix Act. At
25

26 ⁸ [https://www.dailymail.co.uk/femail/article-2918153/Woman-attempts-cover-body-tattoos-chosen-total-](https://www.dailymail.co.uk/femail/article-2918153/Woman-attempts-cover-body-tattoos-chosen-total-strangers.html)
27 [strangers.html](https://www.kqed.org/arts/11485373/illma-communication-naked-trump-portrait-on-display-in-london-gallery); [https://www.kqed.org/arts/11485373/illma-communication-naked-trump-portrait-on-](https://www.kqed.org/arts/11485373/illma-communication-naked-trump-portrait-on-display-in-london-gallery)
[display-in-london-gallery](https://losangeles.cbslocal.com/2017/11/09/louis-vuitton-golden-toilet/); <https://losangeles.cbslocal.com/2017/11/09/louis-vuitton-golden-toilet/>.

28 ⁹ <https://people.com/tv/read-ewan-rachel-wood-harrowing-2018-testimony-to-congress-on-abuse/>;
<https://www.nylon.com/ewan-rachel-wood-domestic-violence>.

1 least one such GoFundMe page for the Phoenix Act stated that its goal was to raise \$250,000.

2 19. The Phoenix Act and those acting on its behalf advertise and promote it as being
3 affiliated with Wood, including in connection with fundraising. The Phoenix Act describes itself
4 as a “survivor-led nonprofit created by Evan Rachel Wood that works to end the cycle of domestic
5 violence through organizing and passing legislation across the country.” (Underline added.) The
6 Phoenix Act is seldom discussed online or in the press without reference to Wood.

7 20. In 2019, Wood and Gore began secretly working on a “documentary” film project
8 to chronicle Wood’s activities on behalf of the Phoenix Act. In summer 2020, when HBO
9 officially signed onto the project, Wood had never publicly alleged that Warner abused her.¹⁰
10 However, just weeks later, in September 2020, Wood decided, for the first time, that she would
11 accuse Warner of abuse.¹¹

12 ~~21. On February 1, 2021, after months of conspiring with Gore on how to use Wood’s~~
13 ~~celebrity status to recruit other women and coordinate their “stories,” Wood posted on her~~
14 ~~Instagram page the false claim that Warner had abused her. That same day, several other women,~~
15 ~~assisted and coordinated by Wood and/or Gore, sought media attention with remarkably similar~~
16 ~~public abuse allegations against Warner. Those claims, like Wood’s, were false.~~

17 ~~22. This deluge of allegations against Warner brought renewed attention to the Phoenix~~
18 ~~Act and Wood—and, in so doing, provided more manufactured content for the HBO project. Its~~
19 ~~director, Amy Berg, confirmed this fact in an interview with Variety, stating that, “**inaming**~~
20 ~~**Manson obviously created a lot more story for us.** It became a two-part film in the edit bay.”~~
21 ~~(Underline and bold added.)¹² On or around January 12, 2022, it was announced that Part One of~~
22 ~~the project—titled Phoenix Rising—would premiere at the Sundance Film Festival in January~~
23 ~~2022, and that both parts would air on HBO in March 2022.¹³ Predictably, both Wood and Gore~~

25 ¹⁰ <https://variety.com/2022/tv/news/evan-rachel-wood-documentary-phoenix-rising-marilyn-manson-sundance-1235151527/>

26 ¹¹ *Id.*

27 ¹² *Id.*

28 ¹³ <https://deadline.com/2022/01/abigail-e-disney-amy-berg-films-join-sundance-2022s-special-screening-section-1234908715/>; https://d2wsrejhnxtgpc.cloudfront.net/assess/SFF22_Program_Guide.pdf.

1 are prominently featured and heroically depicted in the “documentary.”

2 23. Just as Wood had intended, her public allegations against Warner would be seen to
3 corroborate (albeit falsely) her prior statements and testimony that she had been abused by one
4 significant other; and, in turn, the public allegations by several other women would be seen to
5 corroborate (albeit falsely) Wood’s allegations. She also hoped to absolve her reputation for
6 having a wild past, and her embarrassment for having been in a serious, long-term relationship
7 with Marilyn Manson. As explained in more detail below, the timing and overlapping substance
8 of the public accusations against Warner was no coincidence, but rather the product of a wrongful
9 conspiracy by Wood and Gore to organize, coordinate, and promulgate false allegations about
10 Warner. From approximately 2019 to the present, Wood and Gore have conspired to recruit,
11 coordinate, and pressure people to claim that they were abused by Warner, and that it took ten or
12 more years to realize this. In furtherance of this wrongful conspiracy, and in order to enrich
13 herself and benefit Wood, Gore committed a number of illegal acts. Wood acted in furtherance of
14 the conspiracy and aided and abetted Gore’s unlawful conduct.

15 24. Wood and Gore have derailed Warner’s career. Wood acknowledged as much in
16 Phoenix Rising, when she stated that the film itself, which debuted long after her and Gore’s
17 orchestrated attack on Warner began, “isn’t about revenge, or like he’s a monster and like he needs
18 to be punished and destroyed. He’s already destroyed[.]” (Underline added.)

19 A. **Wood and Gore Recruit, Coordinate, and Pressure Prospective Accusers**
20 **to Make False Accusations Against Warner.**

21 25. Gore used the Phoenix Act, in connection with the film project, to recruit,
22 coordinate, and pressure women who had been linked to Warner to make false accusations of
23 abuse against him. Gore did this with Wood’s assistance and/or acquiescence. Together Wood
24 and Gore coordinated allegations and devised the specific buzzwords, phrases, and talking points
25 that prospective accusers would use when they gave interviews or posted their stories on social
26 media; and organized meetings where prospective accusers were encouraged to align their stories
27 and believe not only that their decade-old consensual encounters with Warner were abusive, but
28 also (as multiple accusers have stated publicly) that the alleged abuse caused them to repress their

1 ~~memories for ten or more years.~~

2 26. ~~Gore solicited prospective accusers by phone, text message, email, and/or social~~
3 ~~media, with messages such as the following:~~

4 ~~Hey! I know this is a strange way to reach out but my name is Illma,~~
5 ~~I work with the Phoenix Act I run it alongside Evan Rachel Wood.~~
6 ~~We were organizing a group of people to meet up in Los Angeles~~
7 ~~and Zoom/Skype in to talk about experience they had that might be~~
8 ~~similar to yours. I'm not sure that you would be interested in~~
9 ~~participating you aren't obligated to speak but if you wanted to~~
10 ~~listen in that would be fine. It's a small group and you are personally~~
11 ~~invited. If you wanted to know more first, I would be happy to jump~~
12 ~~on the phone or email more details. Best, Illma.¹⁴~~

13 27. ~~Gore used her proximity to Wood to attract and pressure potential accusers. She~~
14 ~~bragged to them that she was close with Wood and was acting on behalf of the Phoenix Act, which~~
15 ~~she ran alongside Wood. Gore wooed potential accusers by claiming that she wanted them to~~
16 ~~organize through the "Phoenix Act coalition," and were "personally invited" to participate in small~~
17 ~~groups with Wood. The clear implication was that potential accusers could also be close to Wood,~~
18 ~~a famous actress, if they participated and agreed to be featured in Wood's film. These meetings,~~
19 ~~which provided a forum to coordinate allegations, were filmed for Phoenix Rising.~~

20 28. ~~Gore further enticed potential accusers to allege abuse by suggesting that she was~~
21 ~~already amassing evidence for a claimed ongoing criminal investigation of Warner, and that her~~
22 ~~efforts would lead to Warner's arrest. Gore planned that in addition to filming the "small group"~~
23 ~~sessions with Wood and the recruited accusers, the film crew would also record Gore and/or Wood~~
24 ~~dropping their "evidence" off to law enforcement, and Warner's anticipated arrest. Gore and~~
25 ~~others working on the film with her also repeatedly referenced a claimed ongoing criminal~~
26 ~~investigation to intimidate potential accusers, including by suggesting, both directly and by~~
27 ~~implication, that, if they did not participate, they could be in danger, and security would not be~~
28 ~~provided for them and their families.~~

29 ~~///~~

30

31

¹⁴ <https://www.youtube.com/watch?v=3a4LLoGhIY&t=445s>.

1 29. As further evidence of wrongful coordination, Gore provided prospective
2 accusers with a checklist of twenty-one fabricated acts of abuse to ensure that their public
3 claims against Warner would mirror each other and create the fake perception of a pattern
4 of wrongful conduct. A copy of that checklist is attached hereto as Attachment B. The public
5 allegations since made against Warner are not only strikingly similar to each other, but also nearly
6 identical to the recruiting checklist. Wood admitted in part one of Phoenix Rising that many of
7 these other women's allegations were "almost word for word my story." No wonder why.

8 30. As further evidence of coordination, upon information and belief, Gore provided
9 and/or edited scripts for one or more of the recruited accusers to read from in describing their
10 alleged abuse by Warner in media interviews. An example of one such script is attached hereto as
11 Attachment C. In addition to prompting specific allegations with checklists, Gore, with Wood's
12 assistance and/or acquiescence, encouraged prospective accusers to fabricate, change, embellish,
13 and exaggerate their stories, including to make up that they had been raped by Warner,
14 "trafficked" by Warner, and were too scared to speak out. Indeed, Wood and Gore convinced
15 prospective accusers that their failures to allege of abuse over the past ten plus years was not
16 because no abuse occurred, but instead because abuse caused people to "repress" their memories.
17 Multiple accusers have publicly admitted that until their meetings with Gore and Wood, they had
18 "no memory" of abuse; that these meetings "unlocked new memories," and that they "learned
19 from other participants" in Wood's and Gore's groups things they would later accuse Warner of.

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 31. ~~Some women who Wood and Gore contacted refused to participate because what~~
2 ~~they were being asked to say was not true. To the contrary, a number of Warner's romantic~~
3 ~~partners including some recruited by Wood and Gore have come forward to say that the~~
4 ~~allegations did not match their experiences with him.~~¹⁵ ~~Greta Aurora, who was recruited by Gore~~
5 ~~but refused to participate in the coordinated attack, has stated publicly that she was still depicted~~
6 ~~falsely as a victim in a lawsuit filed by Gore associate and Warner's former assistant, Ashley~~
7 ~~Walters.~~¹⁶

8 **B. Wood and Gore Impersonate an Actual FBI Agent by Forging**
9 **a Fictitious Letter Claiming that Wood and Other Alleged Victims**
10 **of Warner Were in Danger.**

11 32. Wood and Gore conspired to impersonate a federal agent by creating and
12 distributing a fictitious letter, attached hereto as **Attachment A**.

13 33. The letter, which Wood and Gore attributed to a real-life federal agent and included
14 a forged signature and fake phone number for that agent, stated that there was an ongoing law
15 enforcement investigation into Warner and there was concern for the safety of Wood, other
16 "victims" of Warner, and their families.

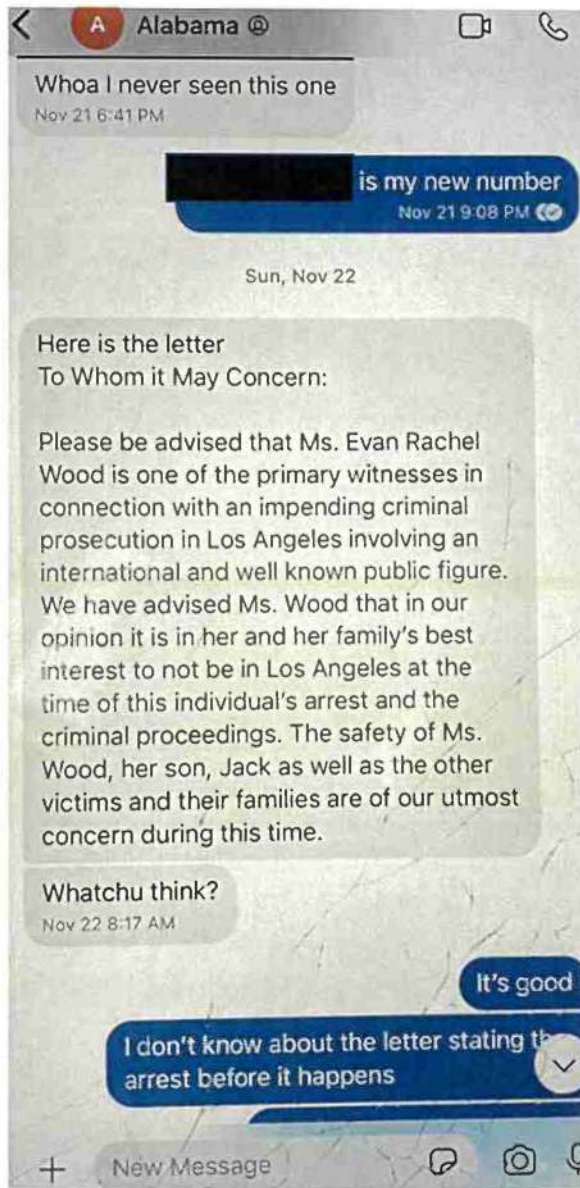
17 34. The federal agent whose name and alleged signature appear on the letter has
18 confirmed that she did not author that letter, had no knowledge of the letter, did not authorize or
19 approve the letter, and has never been involved in any criminal investigation of Warner. The
20 purported federal agency that the letter associates with the agent, the "Federal Violent Crimes
21 Division," does not even appear to exist.

22 35. Screenshots of a conversation between Gore and Wood show that the text of the
23 letter was drafted by Wood and Gore, not the FBI agent. Wood drafted the text of the letter and
24 asked for and received feedback from Gore (including to remove a reference to an imminent
25 arrest). In the conversation, copied below, "Alabama" is Wood—a nickname she was given
26 around the time of her relationship with Warner:

27 _____
28 ¹⁵ See, e.g., <https://loudwire.com/marilyn-manson-ex-wife-dita-von-teese-statement-abuse-allegations/>.

¹⁶ <https://www.youtube.com/watch?v=3a4LLoGhIiY>.

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36. In addition to the crimes detailed above, Wood submitted the forged letter in a California custody proceeding, using it as supposed evidence for why she should be able to move her son to Tennessee. Citing and quoting from the letter, Wood lied under penalty of perjury, stating that she was “advised by criminal investigators that my and my family’s safety was at risk,” and that “[t]o punctuate the seriousness of the situation, I was provided with a correspondence from a representative of the Federal Violent Crimes Department from the FBI.”¹⁷

¹⁷ <https://www.dailymail.co.uk/news/article-10259501/Marilyn-Manson-threatened-Evan-Rachel-Woodsson-actress-claims.html>. Wood’s declaration contained numerous other falsehoods, including the lie that Warner had threatened her son.

1 37. Upon information and belief, Gore aided and abetted Wood in forging the letter
2 because the letter would help Wood; the forged letter would be picked up by the press and draw
3 attention to the Phoenix Act, Wood, and the false allegations against Warner; and the forged letter
4 would be used to recruit, encourage, and convince people to claim they were abused by Warner,
5 because they were being led to believe that Warner was a threat to their safety and under federal
6 investigation.

7 **C. Gore Creates a Fictitious Email Account Impersonating Warner.**

8 38. From in or around September 2019 until the present, Gore used fake email accounts
9 pretending to be Warner to create correspondence that she believed would be harmful to Warner
10 and bolster the allegations levied against him. One such fake email account created and controlled
11 by Gore was “Bhwarner1969@gmail.com.” “Bhw” are Warner’s initials, and 1969 is the year he
12 was born. Warner did not create this email account and never used it.

13 39. For example, upon information and belief, in or around September 2019, Gore used
14 these fake accounts to send and receive emails containing links to pornography. Upon information
15 and belief, these links are believed to have contained prohibited content, as the URLs currently do
16 not work, and thus were likely taken down.

17 40. As another example, upon information and belief, Gore used fake email accounts to
18 create documents that looked like Warner communicating with attorneys regarding a criminal
19 investigation. In one such email dated February 8, 2021, just days after Wood and several others
20 made fictitious claims of abuse against Warner in a coordinated attack, “Bhwarner1969” received
21 an email from a person purporting to be writing on behalf of Warner’s attorney. However, the
22 email’s purported sender did not work for, or ever work for, that attorney.

23 41. Upon information and belief, Gore created these documents as part of the wrongful
24 conspiracy against Warner; to enhance her reputation and esteem with Wood, the Phoenix Act,
25 and persons that she was soliciting or had solicited to speak out against Warner; and, ultimately, to
26 enrich herself. Warner first learned of these fake email accounts and the fake emails described
27 above in November 2021, when copies of these emails were shared with him. Before that, Warner
28 had never received any email sent to or from these fake email accounts. Accordingly, Warner did

1 not discover, and a reasonable and diligent investigation would not have disclosed, that Gore's use
2 of fake email accounts contributed to Warner's harm.

3 **D. Gore "Swats" Warner in February 2021.**

4 42. "Swatting" is the harassment tactic of making a hoax or prank report to emergency
5 services to elicit the dispatch of a large number armed police officers—*e.g.*, the Special Weapons
6 and Tactics (SWAT) team—to a particular location or address.¹⁸ Swatting is often triggered by
7 the false report of a serious law enforcement emergency such as a bomb threat, homicide, hostage
8 situation, or a mental health emergency, for example, the claim that an individual at a certain
9 location is suicidal, homicidal, and/or unwell.¹⁹

10 43. Swatting creates fear, anxiety, and trauma in its victims, as it did with Warner.²⁰ It
11 spurs copycats, especially where the victims are celebrities, or where the incidents are
12 publicized.²¹ And, of course, it carries a high risk of violence, not only for the innocent victims of
13 swatting, but also for the law enforcement officers responding to what then appears to be a serious
14 emergency.²² Accordingly, swatting is and has been crime in California under Penal Code Section
15 148.3 (as well as in other states and under federal law).

16 ///

17 _____
18 ¹⁸ <https://grammarist.com/new-words/swatting/>; <https://time.com/4010748/oxford-dictionary-update-2015/>.

19 ¹⁹ *See, e.g.*, <https://www.foxla.com/news/swatting-call-bomb-threat-saddleback-hospital>;
20 <https://www.wsj.com/articles/swatting-an-intentionally-false-alarm-brings-in-big-guns-11636671179>;
21 <https://www.justice.gov/usao-de/pr/georgetown-man-sentenced-37-months-nationwide-swatting-incidents>;
22 <https://www.nbcnews.com/news/us-news/tennessee-man-targeted-his-twitter-handle-dies-after-swatting-call-n1274747>;
23 <https://abc13.com/friendswood-police-hostage-murder-investigation-homicide/10964385/>;
24 <https://kdvr.com/news/local/missing-suicidal-addy-report-believed-to-be-prank-call-to-confuse-police/>.

25 ²⁰ *See, e.g.*, https://www.washingtonpost.com/local/legal-issues/atomwaffen-leader-prison-sentence/2021/05/04/95544e16-a14b-11eb-a7ee-949c574a09ac_story.html;
26 <https://www.thestar.com/news/gta/2017/07/13/potential-swatting-hoax-in-rosedale-a-dangerous-waste-of-resources-police-say.html>.

27 ²¹ *See, e.g.*, <https://abcnews.go.com/Technology/fbi-swatting-cases-country-copycats/story?id=14257526>;
28 <https://www.yahoo.com/entertainment/blogs/celeb-news/hollywood-swatting-trend-continues-police-claim-copycatting-143553303.html>; <https://www.latimes.com/local/la-xpm-2013-apr-11-la-me-swatting-20130412-story.html>.

²² <https://www.foxnews.com/us/oklahoma-man-at-center-of-police-shooting-said-he-never-made-911-call-that-led-to-raid>; <https://www.cnn.com/2019/09/14/us/swatting-sentence-casey-viner/index.html>;
<https://www.nytimes.com/2017/12/31/us/wichita-swatting-barriss.html>; ²² <https://www.nytimes.com/2021/07/24/us/mark-herring-swatting-tennessee.html>.

1 44. Gore “swatted” Warner on or around February 3, 2021. The LAPD was notified
2 that the FBI had received a call from a “friend” of Warner named Illma Gore who claimed that an
3 emergency existed because she had not been able to reach him and was concerned for his safety.
4 This report was false. Warner was at home with his wife and a guest and not in any danger. Gore
5 knew her report was false—she and Warner have never even met. She has never been Warner’s
6 “friend,” and had no basis to believe Warner posed any risk of danger to himself.

7 45. On the evening of February 3, 2021, multiple LAPD officers and squad cars
8 responded to the purported “emergency” at Warner’s home. When Warner did not answer the
9 door, more units arrived, and an LAPD helicopter was deployed. The officers continued to
10 attempt to gain access into Warner’s home, and the low-flying helicopter circled above, shining its
11 spotlight onto Warner’s property and into the windows of his home.

12 46. At approximately 8:10 p.m., a person associated with Warner received an email
13 from an LAPD detective stating that:

14 Today we were notified by the FBI that they received a call from a
15 friend of Mr. Manson. The friend, Illma Gore, has not been able to
16 reach him and is concerned for his safety. We went to his
17 residence . . . but there was no answer. Is there a way for us to
18 contact him to check on his wellbeing? If not, can you have him
19 reach out to Illma?

20 47. The LAPD returned multiple times, and entered Warner’s property. Eventually, the
21 police left after “determin[ing] there was no evidence of any trouble.”²³

22 48. In addition to four LAPD squad cars and a helicopter, paparazzi were at Warner’s
23 doorstep. When the police arrived, the paparazzi took videos and photographs, and recorded
24 someone making the false statements (which can be heard in the videos) that a person inside the
25 house was screaming for help. This created an even more dangerous situation for Warner and his
26 wife and guest inside the house. Upon information and belief, the paparazzi were present because
27 they had been tipped off in advance by Gore, who, as explained below, had solicited and
28 improperly received Warner’s home address and other personal information.

²³ <https://pagesix.com/2021/02/04/police-respond-to-incident-at-marilyn-mansons-la-home-report/>; *see also*
<https://www.latimes.com/local/lanow/la-xpm-2013-apr-11-la-me-ln-lapd-to-keep-celebrity-swatting-calls-secret-from-media-20130411-story.html>.

1 49. That evening, video and images of the police response were posted and went viral
2 online, as it was reported that “Marilyn Manson’s home was swarming with cops after a worried
3 friend called concerned for the singer’s well-being[,] saying they’d been unable to get in touch
4 with him for hours.”²⁴ Other outlets reported that a “welfare check was requested by an alarmed
5 friend who had spent several hours trying to contact the singer just days after a slew of women
6 publicly accused him of abuse.”²⁵ Many of these published stories linked the abuse allegations
7 made against Warner to the police response. Predictably, press reports focused heavily on the fact
8 that just two days earlier, on February 1, 2021, Wood and several other women made public
9 accusations against Warner. This was all by design.

10 50. Gore made the false report in order to elicit the dispatch of a large number of armed
11 police officers to Warner’s home; Gore’s purposes included harassing and causing harm to Warner
12 in the immediate wake of the highly organized and orchestrated February 1, 2021 accusations;
13 drawing further attention to the false allegations against Warner that she had coordinated; and
14 creating a situation that could result in video footage of Warner being arrested. It also created a
15 scenario in which Warner, his wife, or his guest could have been harmed in the chaos of the
16 moment. This swatting by Gore was part of a scheme to benefit the Phoenix Act, Wood, and the
17 film project; and to curry favor with Wood and potential and existing accusers against Warner.
18 Based on the press coverage of the police response—which reported on the “disturbing incident”
19 at Warner’s home and the allegations levied days earlier,²⁶ but not that this “welfare check” was a
20 hoax—Gore was successful.

21 ///

23 ²⁴ See, e.g., <https://www.tMZ.com/2021/02/03/cops-marilyn-manson-welfare-check-evan-rachel-wood-abuse/>.

24 ²⁵ See, e.g., <https://pagesix.com/2021/02/04/police-respond-to-incident-at-marilyn-mansons-la-home-report/>.

26 ²⁶ See, e.g., <https://www.the-sun.com/entertainment/2267696/marilyn-manson-la-home-cops-disturbing-incident-abuse-assault/>; see also <https://www.yahoo.com/now/marilyn-manson-receives-welfare-check-150800365.html> (“Marilyn Manson Receives Welfare Check From Police Amid Abuse Allegations”); <https://www.foxnews.com/entertainment/cops-respond-marilyn-manson-home-welfare-check-abuse-allegations> (“Cops respond to Marilyn Manson’s home for ‘welfare check’ amid ongoing abuse allegations”).

1 **E. Gore Hacks Warner’s Computer Files and Social Media Accounts.**

2 51. Upon information and belief, Gore gained unauthorized access to—e.g., hacked—
3 Warner’s email login and passwords, social media login and passwords, and social security
4 number. Among other sources, Gore solicited and obtained this information from Ashley Walters.
5 Walters was Warner’s former assistant, and one of the women recruited by Gore and Wood to
6 make accusations against Warner

7 52. As part of her work for Warner, Walters was entrusted with Warner’s private
8 information by Warner and his representatives. As is common in the entertainment business and
9 numerous other professions that handle sensitive, potentially high-profile matters, Walters entered
10 into a confidentiality agreement that prohibited her from disclosing such information.

11 53. Gore procured from Walters, among other private and protected information,
12 Warner’s email and social media logins and passwords, and Warner’s social security number,
13 home address, and phone number. Gore procured this information knowing that she would use it
14 to gain access to and use data, a computer, a computer system, a computer network, and/or
15 computer services.

16 54. Indeed, Gore has a history with precisely this type of wrongful conduct. In
17 November 2021, a Santa Cruz County judge issued a temporary restraining order against Gore
18 after her twin sister recounted that Gore “committed Digital Spying & Stalking against me,”
19 “made me fear that I & my children were in immediate danger/serious physical injury,” and
20 “disturb[d] my peace, liberty & free will with coercive control.” Gore has boasted that she has a
21 computer science background and is interested in hacking.

22 55. Upon information and belief, Gore used information provided by Walters and
23 others to gain access to Warner’s personal details, private conversations, email accounts, phones,
24 and social media accounts. Gore used the information she obtained as part of her scheme to
25 orchestrate and promulgate false accusations against Warner, including the coordinated false
26 accusations against Warner on February 1, 2021 and thereafter, which would bring further
27 attention to the Phoenix Act, Wood, and the film project; and to curry favor with Wood and
28 potential and existing accusers against Warner.

1 ~~F. Gore Slanders Warner.~~

2 56. ~~Between 2019 and 2021, as part of her multi pronged attack on Warner, Gore had~~
3 ~~multiple conversations with prospective “accusers” in which she claimed that a 1996 short film~~
4 ~~made by Warner called “Groupie” depicted child abuse and child pornography.~~

5 57. ~~During one such conversation in 2021, Gore said that the actress in “Groupie” was~~
6 ~~a minor at the time of the shoot and was “dead,” and that, if the video were to be seen, Warner~~
7 ~~would be indicted.~~

8 58. ~~Gore’s statements about Warner and “Groupie” are demonstrably false. Gore knew~~
9 ~~they were false or acted with reckless disregard of their falsity.~~

10 59. ~~The actress, Pola Weiss, was 22 years old at the time the film was made. She has~~
11 ~~publicly stated that she was not a minor, was involved in conceptualizing the plot of the film, and~~
12 ~~“was acting” and “hamming it up.”²⁷ Clips from “Groupie” were featured in a 1998 tour~~
13 ~~documentary called “Dead to the World.” Weiss not only was thanked in the credits to that film~~
14 ~~but also went on to star in music videos, including Manson’s “Long Hard Road Out of Hell” in~~
15 ~~1997 and Garbage’s “Push It” in 1998. The director of “Groupie” and “Dead to the World,”~~
16 ~~Joseph Cultice, has publicly stated that Gore’s claims are “all fake.”~~

17 60. ~~Still, promulgating these and other falsehoods was part of Gore’s scheme to~~
18 ~~orchestrate and amplify false accusations against Warner, thereby bolstering Wood’s claim that~~
19 ~~Warner had been her (and others’) abuser. This, in turn, would bring further attention to the~~
20 ~~Phoenix Act, the associated film project; and curry favor with Wood and potential and existing~~
21 ~~accusers against Warner. Indeed, Gore’s defamatory allegations regarding “Groupie” have been~~
22 ~~repeated in at least one civil complaint filed against Warner (and consequently have reverberated~~
23 ~~through the press). This is entirely unsurprising, given that Gore discussed these false allegations~~
24 ~~with prospective accusers.~~

25 61. ~~Wood condoned and encouraged Gore to promulgate defamatory falsehoods about~~
26 ~~Warner in order to further their conspiracy.~~

27

28 ²⁷ [https://www.rollingstone.com/music/music-features/marilyn-manson-abuse-allegations-1256888;](https://www.rollingstone.com/music/music-features/marilyn-manson-abuse-allegations-1256888)
[https://www.youtube.com/watch?v=ZyXOzFOWTDk.](https://www.youtube.com/watch?v=ZyXOzFOWTDk)

1 **FIRST CAUSE OF ACTION**

2 **(Intentional Infliction of Emotional Distress)**

3 62. Warner incorporates by reference the preceding allegations as if fully set forth
4 herein.

5 63. Gore's and Wood's conduct was outrageous in that it was so extreme as to exceed
6 all bounds of that usually tolerated in a civilized community. This conduct included:

7 (a) initiating at least one incident of illegal and highly dangerous "swatting" of
8 Warner in February 2021;

9 (b) soliciting, receiving, and using logins and passwords for Warner's personal
10 and business social media and email accounts, and his address, phone number, and social security
11 number, without his permission;

12 (c) falsifying correspondence from a fictitious federal agent claiming that there
13 was concern for the safety of Wood, other alleged "victims" of Warner, and their families as well
14 as an ongoing federal criminal investigation targeting Warner;

15 ~~(d) making knowingly false and defamatory statements against Warner,~~
16 ~~including that the actress in the "Groupie" video was a minor, and that Warner was manufacturing~~
17 ~~child pornography; and~~

18 ~~(e) recruiting, coordinating, and pressuring multiple women to make false~~
19 ~~accusations against Warner and to be part of their film project.~~

20 64. Gore and Wood intended to cause Warner emotional distress. In the alternative,
21 Gore and Wood acted with reckless disregard of the probability that Warner would suffer
22 emotional distress as a result of their conduct.

23 65. Warner suffered severe emotional distress.

24 66. Gore's and Wood's outrageous conduct was a substantial factor in causing
25 Warner's severe emotional distress, and was the actual and proximate cause of the emotional
26 distress.

27 ///

28 ///

1 67. Gore and Wood acted with oppression, fraud, or malice as defined by California
2 Civil Code Section 3294 and engaged in highly reprehensible conduct warranting punitive
3 damages.

4 ~~SECOND CAUSE OF ACTION~~

5 ~~(Defamation Per Se)~~

6 68. ~~Warner incorporates by reference the preceding allegations as if fully set forth~~
7 ~~herein.~~

8 69. ~~Gore stated to persons other than Warner that during the filming of "Groupie," the~~
9 ~~actress in the video was a minor, and that the actress was "dead." Gore understood the statements~~
10 ~~to refer to Warner, and specifically to mean that Warner's role in the making of "Groupie," e.g., as~~
11 ~~a child pornography was criminal; indeed, she stated that "Groupie" was evidence of a felony and~~
12 ~~that Warner would be indicted as a result.~~

13 70. ~~Those statements about "Groupie" were false. The actress in the video, Pola~~
14 ~~Weiss, is alive. She was not a minor when "Groupie" was filmed. She has since publicly stated~~
15 ~~that she was not a minor at any time during the production of the film. In addition, the director of~~
16 ~~the film, Joseph Cultice, has publicly stated that these claims are "all fake."~~

17 71. ~~On information and belief, Gore knew the statements were false or had serious~~
18 ~~doubts as to their truth. Upon information and belief, Gore knew the actress was not a minor, or~~
19 ~~had serious doubts that she was a minor, but instead intended to peddle these false and defamatory~~
20 ~~statements because they would validate and enhance her fabricated narrative regarding Warner's~~
21 ~~alleged abuse of others, including as reflected on the checklist provided to women that Gore~~
22 ~~recruited to come out against Warner.~~

23 72. ~~Gore made the above-described false and defamatory statements without privilege~~
24 ~~or justification.~~

25 73. ~~The above-described false and defamatory statements injured Warner by~~
26 ~~diminishing his reputation in his profession, trade, and/or business, which has a natural tendency~~
27 ~~to lessen his profits. It was Gore's intent and expectation was that the defamatory statements~~
28 ~~would injure Warner economically, including by lessening his profits. The above-described false~~

1 ~~and defamatory statements also injured Warner by causing him to experience harm that is~~
2 ~~compensable by general damages. Gore's intent and expectation was that the defamatory~~
3 ~~statements would cause Warner this harm.~~

4 74. ~~Warner did not discover and had no reason to discover what prospective accusers~~
5 ~~had been told in confidential discussions with Gore until one such person revealed in at least~~
6 ~~November 2021 that Gore had made these statements.~~

7 75. ~~Gore also acted with oppression, fraud, or malice as defined by California Civil~~
8 ~~Code Section 3294 and engaged in highly reprehensible conduct warranting punitive damages~~

9 **THIRD CAUSE OF ACTION**

10 **(Violation of the Comprehensive Computer Data and Access Fraud Act**
11 **(Penal Code Section 502(c), (e)(1)))²⁸**

12 76. Warner incorporates by reference the preceding allegations as if fully set forth
13 herein.

14 77. Gore with Wood's express or tacit approval solicited, received, and used logins and
15 passwords for Warner's personal, business, social media and email accounts without his
16 permission, including from Warner's former assistant who was entrusted with such information as
17 part of performing her duties for Warner.

18 78. Upon information and belief, Gore and Wood knowingly accessed and without
19 permission deleted, destroyed, or otherwise used data, a computer, a computer system, or a
20 computer network in order to devise or execute a scheme or artifice to defraud, deceive, or extort,
21 and/or wrongfully control or obtain money, property, or data. (Section 502(c)(1).)

22 79. Upon information and belief, Gore and Wood knowingly accessed and without
23 permission took, copied, and/or made use of data from a computer, computer system, or computer
24 network. (Section 502(c)(2).)

25 ///

26 _____

27 ²⁸ Section 502(e)(1) provides for a private right of action: "In addition to any other civil remedy available,
28 the owner or lessee of the computer, computer system, computer network, computer program, or data who
suffers damage or loss by reason of a violation of any of the provisions of subdivision (c) may bring a civil
action against the violator for compensatory damages and injunctive relief or other equitable relief."

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PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays for the following:

- A. Damages including general and special damages in an amount to be proven at trial;
- B. Punitive damages;
- C. All costs, interest, and attorneys' fees to the extent provided by law;
- D. An order enjoining Wood and Gore from engaging in further wrongful conduct toward Warner;
- E. Such other and further relief as this Court may deem just and proper.

JURY DEMAND

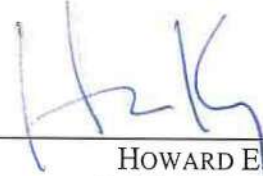
Plaintiff hereby demands a trial by jury of all triable issues.

DATED: March 2, 2022

Respectfully submitted,

KING, HOLMES, PATERNO & SORIANO, LLP

By:



HOWARD E. KING

Attorneys for Plaintiff Brian Warner

ATTACHMENT A

To Whom it May Concern,

Please be advised that Ms. Evan Rachel Wood is a key witness in connection to a criminal investigation in Los Angeles, California involving an international and well known public figure. The safety of Ms. Wood, her family, other victims, and of their families are of the utmost concern during this time.

Contact for more information regarding the safety of victims Human and Sex Trafficking crimes.

REDACTED

Federal Violent Crimes Department

REDACTED

REDACTED

REDACTED

DEPUTY DISTRICT ATTORNEY

REDACTED@da.lacounty.gov

REDACTED

REDACTED

SPECIAL VICTIMS BUREAU

LOS ANGELES REGIONAL

HUMAN TRAFFICKING TASKFORCE

REDACTED

~~**ATTACHMENT B**~~

NAME: REDACTED
CONTACT: REDACTED
WILLING TO TESTIFY:

- YES
- NO
- IT'S COMPLICATED:

-
- SEXUAL PARTNER
 - SPOUSE
 - STAFF AND/OR BAND MEMBER

OFFERED PROJECT OR PROFESSIONAL OPPORTUNITY THAT NEVER CAME TO FRUITION OR WAS VASTLY DIFFERENT TO HOW IT WAS FIRST PRESENTED

- RAPE
- BLOOD DRINKING
- COMMERCIAL SEX ACT OR ACTS
- CUT OR ASSAULTED DURING SEX WITHOUT PRIOR CONSENT
- TIED UP OR BOUND

- LOCKED IN BATHROOM TO PREVENT FROM LEAVE
- MADE TO GUARD GIRL TO MAKE SURE SHE DOESN'T LEAVE OR COMMIT SUICIDE
- SLEEP DEPRIVATION
- FORCED TO EAT ON SPECIFIC EATING SCHEDULE
- GIVEN A DRESS CODE

- DRUGGED OR SUSPECTED TO BE DRUGGED WITH ROHYPNOL
- THREATENED

- UNDERAGE AND GIVEN DRUGS AND/OR ALCOHOL
- SCARIFICATION

- EXPLOITATION OR BLACKMAIL OF DOCUMENTS, PHOTOS, AND/OR VIDEO
- ASSAULT/BATTERY WITH DEADLY WEAPON

- HELPED TO COORDINATE SCHEDULES AND/OR LOCATIONS OF WOMEN
- MATCHING TATTOOS WITH MARILYN MANSON AKA BRIAN WARNER

- WAS A MINOR AND HAD A SEXUAL RELATIONSHIP WITH MARILYN MANSON AKA BRIAN WARNER
- TRANSPORTED TO LOS ANGELES/OVERSEAS/INTERSTATE

DATE OF RELATIONSHIP BEGINNING/END:

STRIKE

~~**ATTACHMENT C**~~

and
so when he hit me I started to feel crazy

I thought she was crazy, I saw her scream crying and
he told me she was ~~going~~ ~~was~~ ~~back~~ ~~to~~ ~~work~~
on a film project

I would cry ~~that~~ ~~water~~ and slit my wrists in the hopes
that he'd stop hurting me
I must've looked crazy

I was there to film a ~~project~~ music video ^{from the abuse}
~~tonight~~ in my career

I was relieved for one night I would get ~~some~~ a break, ~~because~~ I wasn't
~~allowed to leave~~

I realized the ~~the~~ ~~fitting~~ wasn't professional ~~very~~ quickly

but I didn't want to question him I couldn't ^{just} leave

~~because~~ ~~me~~ ~~when~~ ~~I~~ ~~asked~~ ~~what~~ ~~he~~ ~~was~~ ~~doing~~ ~~there~~ ~~even~~ ~~if~~ ~~I~~ ~~wanted~~ ~~to~~
he ~~is~~ ~~my~~ ~~ex~~ ~~and~~ ~~he~~ ~~was~~ ~~in~~ ~~there~~ ~~even~~ ~~if~~ ~~I~~ ~~wanted~~ ~~to~~
he texted me 'saying he could rape me'

I woke up tied up being raped.

with In the morning he told me he loved me, I started to ~~return~~ ^{think of a}
a way to ~~leave~~ escape

accept his apology

~~we~~ ~~move~~ ~~passed~~ ~~this~~ ~~together~~

~~we~~ ~~are~~ ~~lovers~~ ~~and~~

he loves me

and I trust him

because

~~that~~ ~~to~~ ~~find~~ ~~a~~ ~~way~~ ~~to~~ ~~get~~ ~~out~~ ~~of~~

Kept's back to
we connected over ~~the~~ ~~same~~
~~thing~~

EXHIBIT 8

Manson † Wiki

The Marilyn Manson Encyclopedia

Adina Slotsky

From MansonWiki, the Marilyn Manson encyclopedia

Adina Slotsky (born c. 1975) is an American artist and photographer, as well as a self-proclaimed dominatrix.[1] Her encounters with Marilyn Manson are documented in Manson's autobiography *The Long Hard Road Out of Hell* and the unauthorized documentary *Demystifying the Devil*. In *The Long Hard Road Out of Hell*, a transcript of an interview held on August 9, 1997 where Manson describes Slotsky comprises the "Meating the Fans / Meat and Greet" chapter, where she is referred to alternatively as "Alyssa".[2] When Slotsky was around 17 years old,[1] she met the band backstage at the Plus Five in Fort Lauderdale, Florida in 1993.[3][2] Manson explains, "I immediately realized that she was deaf because of the way her voice sounded. She told me that she could feel the music when she's close to the stage and that's how she gets her enjoyment from it." [2] Manson goes on to assert that Slotsky apparently wanted to have sex with him, but because his girlfriend, Melissa Romero, was also at the club, he was not interested in her advances.[2] In *Demystifying the Devil* however, Slotsky gives a different account of the meeting, explaining that after the club manager approached her about visiting the band backstage, "Brian comes up and he grabs my boob, I'm like, fuck you!" [3]



Adina Slotsky describes her encounter with Marilyn Manson on Howard Stern.

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Experience with Marilyn Manson[edit]

The exact date of Slotsky's second encounter with the band is unclear. Citing Manson's autobiography, the meeting can be traced to the summer of 1994, when the band spent some time in Miami, Florida recording a cover of Tubeway Army's "Down in the Park".[3] However citing Slotsky's 1999 appearance on Howard Stern and her 2000 appearance in *Demystifying the Devil*, the meeting can be traced to a time when she was around 17 years old [1] and Marilyn Manson was recording their major label debut, *Portrait of an American Family*, [2] which occurred in 1993. While both accounts state that the incident took place in South Beach, in reality no material on *Portrait* was recorded in this area of Miami, which would somewhat lean the date in Manson's favor if his account did not place her age at the time as 19.

When Manson left the band's outpost at South Beach Studios "to get something to eat," he ran into Slotsky, a resident of South Beach at the time, [3] who he invited back to the studio to meet the band, Trent Reznor and Sean Beavan, among others. Manson muses that "[...] it was ironic because just that day, Pogo was saying that one of his fantasies was to have sex with a deaf girl because then he could say whatever he wanted without upsetting her or feeling embarrassed." [2] Manson confesses that "to break the ice, I usually say whatever is on my mind," which in this case led him to ask Slotsky to take off her clothes; she complied, stripping down to her boots, leaving the group both shocked and amazed to command this much "sexual power". [2]

The band proceeded to cover Slotsky in a variety of uncooked meats they had collected earlier that day, which Manson describes as "one half hour of pure meat cavorting." [4] The group documented the experience with sketches, photographs, on videotape, and "whatever way we could capture this great moment in art history." [4] According to *The Long Hard Road Out of Hell*, Manson then tried escalating the situation by asking bassist Twiggy and Stephen Bier, better known as former Marilyn Manson keyboardist Madonna Wayne Gacy, to scotch tape their penises together to see if Slotsky could put them both in her mouth. In the midst of this and the "cameras, street musicians, and sketch artists" in the room, the group allegedly decided that Bier should live his fantasy of having sex with a deaf girl. Manson notes that he does not feel Slotsky was being exploited by this, as it was something she was very excited to be part of, and everyone in the group besides Nine Inch Nails were "having a good time" watching the experience, although one of the things Bier shouted while reportedly having sex with Slotsky "seemed to echo through the room as maybe one of the darkest things we had ever heard." [4]

Afterwards, Slotsky wanted to take a shower to wash off the "meat slime and assorted body fluids." In light of this, Manson reports asking if he and Twiggy could urinate on her, which she purportedly condoned, granted that they kept away from her eyes and boots. During this however, Twiggy did not aim properly and splashed her in the face. Manson explains "that was when everyone else in the room completely shut down and realized things had gone too far." [4] While Slotsky was left to shower, then-guitarist Daisy Berkowitz, returned to the studio. The group did not

inform him what happened shortly before, but instead directed him to join Slotsky in the shower. Manson recalls, "The water hadn't really rinsed her off yet, and he started making out with her where urine had just been on her lips [...] If he knew that she was covered in urine, he probably wouldn't have cared anyway."^[5]

During her interview segments in *Demystifying the Devil*, where she is accompanied by a gimp, Slotsky confirms meeting Manson in both Fort Lauderdale and Miami, however after explaining how the band covered her in meat, her story deviates from Manson's account. Instead, Slotsky explains that she was hesitant over Manson's proposition to have sex, but that regardless, he couldn't get an erection because of all the other people in the room^[3] (it is unclear if she is referring to Marilyn Manson or Stephen Bier here, as she acknowledges the autobiography's statement "And he started to fuck her from behind" which refers to Bier, but thus far in the interview she doesn't mention by name anyone besides Manson). In Slotsky's account, Manson did not propose that he and Twiggy urinate on her. Rather, Twiggy used a toilet before aiming his urine at Slotsky. In retaliation, Slotsky reportedly urinated on a roll of toilet paper and threw it at someone holding a camera^[3] (possibly Jonathan Rach, who Manson mentions in the autobiography was frequenting the studio as *Nine Inch Nails'* video documentarian at the time,^[2] as Reznor was preparing the home video *Closure*). When Putesky joined her in the shower he did not advance on her, but rather he proceeded to complain about his bandmates.^[3] At this point in the story, there are two things that do not deviate between both Manson and Slotsky's accounts: the extraordinary size of Putesky's penis, and the fact that the group threw a raw salmon head into the running shower after Putesky joined her.^[6]^[3]

Filmography^[edit]

Howard Stern (1999, one episode)

Demystifying the Devil (2000)

Trivia^[edit]

According to Manson's account, he met Adina Slotsky at Gidget Gein's last gig.^[2] While previously posted as December 31, 1993, in an MTV interview (<http://www.youtube.com/watch?v=06sUyzbyCwQ>), Gein stated he received his termination papers on that night while in rehab making it impossible for his last gig to be December 31.

References^[edit]

↑ 1.0 1.1 1.2 Howard Stern. E!. Adina Slotsky. August 21, 1999.

↑ 2.0 2.1 2.2 2.3 2.4 2.5 2.6 2.7 2.8 *The Long Hard Road Out of Hell*. ReganBooks. Marilyn Manson. April 1, 1999. pp. 201

↑ 3.0 3.1 3.2 3.3 3.4 3.5 3.6 3.7 *Demystifying the Devil*. Ventura Distribution. Adina Slotsky. October 17, 2000.

↑ 4.0 4.1 4.2 4.3 *The Long Hard Road Out of Hell*. ReganBooks.

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↑ *The Long Hard Road Out of Hell*. ReganBooks. Marilyn Manson. April 1, 1999. pp. 204

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