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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

INTRODUCTION

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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.

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

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

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

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

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

28 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.

PARTIES

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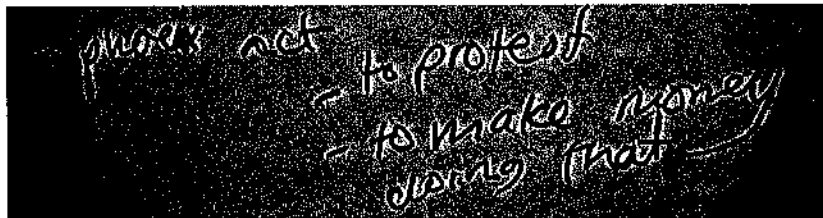
28 ⁷ <https://www.rollingstone.com/tv/tv-features/evan-rachel-wood-how-wild-past-personal-demons-prepped-her-for-westworld-107632/>.

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 [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-evan-rachel-wood-harrowing-2018-testimony-to-congress-on-abuse/>;
<https://www.nylon.com/evan-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, “**in laming
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://d2wsrejhnxtatgp.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.

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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.

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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.

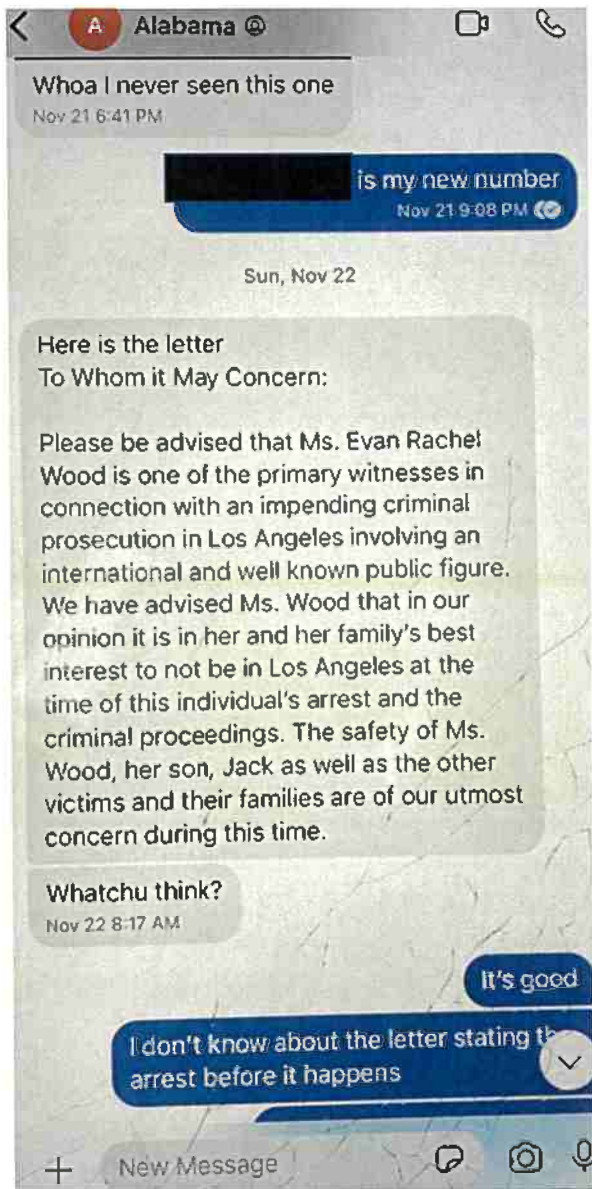
22 35. Screenshots of a conversation between Gore and Wood show that the text of the
23 letter was drafted by Wood and Gore, not the FBI agent. Wood drafted the text of the letter and
24 asked for and received feedback from Gore (including to remove a reference to an imminent
25 arrest). In the conversation,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

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28 ¹⁵ See, e.g., <https://loudwire.com/marylin-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-Wood-ss-son-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).

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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-vinex/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.tmg.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.

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28

²⁷ <https://www.rollingstone.com/music/music-features/marilyn-manson-abuse-allegations-1256888>;
<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.

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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."

1 80. Upon information and belief, Gore and Wood knowingly and without permission
2 used or caused to be used computer services. (Section 502(c)(3).)

3 81. Upon information and belief, Gore and Wood knowingly and without permission
4 accessed or caused to be accessed a computer, computer system, or computer network. (Section
5 502(c)(7).)

6 82. Upon information and belief, Gore and Wood knowingly and without permission
7 provided and/or assisted in providing a means of accessing a computer, computer system, or
8 computer network in violation of Penal Code Section 502. (Section 502(c)(6).)

9 83. Warner was harmed as a result of Gore's and Wood's conduct, and Gore's and
10 Wood's conduct was a substantial factor in causing Warner's harm.

11 84. Gore and Wood acted with oppression, fraud, or malice as defined by California
12 Civil Code Section 3294 and engaged in highly reprehensible conduct warranting punitive
13 damages.

14 **FOURTH CAUSE OF ACTION**

15 **(Impersonation over the Internet (Penal Code Section 528.5(a), (e)))²⁹**

16 85. Warner incorporates by reference the preceding allegations as if fully set forth
17 herein.

18 86. Gore with Wood's express or tacit approval knowingly and without consent
19 credibly impersonated Warner through and/or on an Internet Web site or by other electronic means
20 for purposes of harming, intimidating, threatening, or defrauding Warner.

21 87. Warner was harmed as a result of Gore's and Wood's conduct, and of Gore's and
22 Wood's conduct was a substantial factor in causing Warner's harm.

23 88. Gore and Wood acted with oppression, fraud, or malice as defined by California
24 Civil Code Section 3294 and engaged in highly reprehensible conduct warranting punitive
25 damages.

26 _____
27 ²⁹ Section 528.5(e) provides for a private right of action: "In addition to any other civil remedy available, a
28 person who suffers damage or loss by reason of a violation of subdivision (a) may bring a civil action
against the violator for compensatory damages and injunctive relief or other equitable relief pursuant to
paragraphs (1), (2), (4), and (5) of subdivision (e) and subdivision (g) of Section 502."

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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

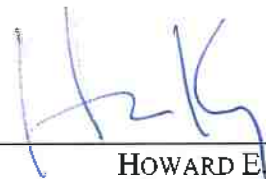
Plaintiff hereby demands a trial by jury of all triable issues.

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 TASK FORCE

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 'BAD GIRL ROOM' OR UNABLE TO PHYSICALLY 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:

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 ~~strong~~ ~~was~~ ~~part~~ ~~to~~ ~~work~~
on a film project

I would cry ~~that~~ ~~about~~ 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, ~~but~~ ~~it~~ ~~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

~~he~~ ~~ignored~~ ~~my~~ ~~cries~~ ~~and~~ ~~took~~ ~~his~~ ~~phone~~
he ~~texted~~ ~~me~~ 'saying he could rape me' ^{even if I wanted to}

I woke up tied up being raped.

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

accept his apology

~~we~~ ~~pushed~~ ~~this~~ ~~together~~

~~because~~ ~~he~~ ~~loves~~ ~~me~~

and I trust him

~~know~~ ~~to~~ ~~find~~ ~~a~~ ~~way~~ ~~to~~ ~~get~~ ~~out~~

Kept ~~back~~ to
we connected over ^{the} ~~same~~
~~thing~~