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7
 8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
 9 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

10
 11 BRIAN WARNER p/k/a MARILYN
 MANSON,

12 Plaintiff,

13 vs.

14 EVAN RACHEL WOOD; ASHLEY GORE
 15 a/k/a/ ILLMA GORE,

16 Defendants.

CASE NO. 22STCV07568

DECLARATION OF BRYTON GORE

[Filed concurrently with: Opposition to Gore's anti-SLAPP Motion; Opposition to Wood's anti-SLAPP Motion; King Declaration; Supplemental King Declaration; Berk Declaration; Warner Declaration; Balog Declaration; Weiss Declaration; Meyer Declaration; Kunkel Declaration; Opposition to Gore's RJN; Warner's Objections to Defendants' Evidence; Notice of Lodging; Application to Seal; [Proposed] Order Granting Sealing Application]

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 Time: 10:00 a.m.
 Dept.: 50

The Hon. Teresa A. Beaudet, Dept. 50

Action Filed: March 2, 2022
 Trial Date: Not Set

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DECLARATION OF BRYTON GORE

I, Bryton Gore, declare as follows:

1. The following facts are within my personal knowledge and, if called as a witness herein, I can and will competently testify thereto.

2. Ashley Gore a/k/a Illma Gore is my identical twin sister.

3. Until approximately June 2021, I was living in Australia. In 2019 and 2020, I regularly kept in touch with Illma. She told me that she was dating actress Evan Rachel Wood.

4. In or around April 2021, Illma traveled to Australia and stayed with me, my daughters, and my roommate. Illma told me the purpose of her visit was to help me move to the United States in summer 2021. We had discussed me wanting to rejoin our family members who lived in the United States.

5. During this trip to Australia, I witnessed Illma using an iPad Pro. Illma told me she borrowed the iPad Pro from our cousin Madeline Dinse (who lived in the United States) because Illma's own iPad had been damaged by Wood's son, Jack. She told me her broken iPad was in the United States.

6. In or around April to May 2021, I was sitting next to Illma in the sunroom of my house while she was on a call with Wood over the speakerphone. Illma told me it was Wood on the phone. During this call, Wood said there was "something wrong" with the "FBI letter" and that she needed Illma to send her a copy. This call was tense and Illma appeared unnerved. Illma was using the iPad Pro. I witnessed Illma use the Procreate application (a graphics editing tool I was familiar with) to transfer a signature from one document onto what appeared to be a letter from a federal law enforcement agent. Watching this was alarming so I asked Illma what she was doing. She said letter was from the Federal Bureau of Investigation, and it was "OK" because, she said, "I know the agent" and "have her number." When Illma was finished working on the letter, I watched her send it back to Wood.

7. In June 2021, my daughters and I moved to the United States from Australia. We first stayed in Oregon with Dinse's mother. In or around July 2021, we moved into a house in Watsonville, California with Dinse.

1 8. Illma previously told me in about April-May 2021 that she wanted to move in with
2 me and Dinse although Illma was living in Los Angeles. In or around July 2021, Illma began
3 staying with us in Watsonville, after she told me she had a conflict with her roommate in Los
4 Angeles and was moving out. Around this time (August-September 2021) a number of Illma's
5 items and furniture were delivered to the house by truck.

6 9. I first saw the broken iPad while Illma was staying with us in Watsonville. Illma
7 gave me the iPad and told me it was a gift for me and my daughters. The screen was cracked and
8 it did not power on. I put the broken iPad away for safe keeping until I could afford to, or figure
9 out how to, fix it. During this time, I observed Illma continuing to use Dinse's iPad Pro.

10 10. In or around September 2021, living with Illma became intolerable. Illma vacated
11 the house, saying that she was going on a work trip to Florida. She did not come back. Illma left
12 behind various items, furniture, and boxes at the house. She took Dinse's iPad Pro with her. She
13 did not take the broken iPad that she gifted to me and my daughters. When Illma left, there was
14 no doubt in my mind that the broken iPad belonged to me.

15 11. In or around October to November 2021, I attempted to get the broken iPad
16 running. I did not get the screen fixed because it was too expensive. However, I plugged the
17 broken iPad into a weaker power source (not the wall jack), which I thought may help get it
18 powered up. It worked, and the broken iPad powered up. Over the years, Illma shared her iCloud
19 credentials with me so that I could use her account and Apple devices. I opened the iPad with
20 these credentials once it was powered up so I could use it.

21 12. What I saw on the broken iPad horrified me. Among other things, I saw emails and
22 draft emails that were purportedly written and/or sent by me, which I never drafted, authorized, or
23 sent; and social media posts and draft posts purportedly written by me which I never drafted,
24 authorized, or posted. I also saw a number of items on the broken iPad relating to Wood, the
25 Phoenix Act, and Brian Warner p/k/a Marilyn Manson, who I knew was Wood's ex-significant
26 other.

27 13. One item I saw on the broken iPad was a screenshot of a text conversation on the
28 Signal app between Wood and Illma. A true and correct copy of that screenshot is attached as

1 **Exhibit A.** The screenshot was dated December 20, 2020. The conversation, dated “Sunday, Nov
2 22”—November 22 fell on a Sunday in 2020—was between someone named “Alabama,” on one
3 hand, and someone who said that “424-489-1211 is my new number,” on the other hand. I know
4 this is Illma’s phone number because I used the same number to call her. As described further
5 below, I understand that “Alabama” is Wood because Illma told me she referred to Wood as
6 Alabama and I witnessed and took part in conversations over the Signal app in which Wood used
7 the nickname Alabama.

8 14. In this conversation, Wood stated:

9 “Here is the letter

10 To Whom it May Concern:

11 Please be advised that Ms. Evan Rachel Wood is one of the
12 primary witnesses in connection with an impending criminal
13 prosecution in Los Angeles involving an international and well
14 known public figure. We have advised Ms. Wood that in our
15 opinion it is in her and her family’s best interest to not be in Los
16 Angeles at the time of this individual’s arrest and the criminal
17 proceedings. The safety of Ms. Wood, her son, Jack as well as the
18 other victims and their families are of utmost concern during this
19 time.

20 Whatchu think?”

21 15. Illma responded, “It’s good[.] I don’t know about the letter stating th[e] arrest
22 before it happens[.]”

23 16. Another item I saw on the broken iPad was an image of a undated letter purportedly
24 written and signed by “Michelle Langer” of the “Federal Violent Crimes Department.” A true and
25 correct copy of that screenshot is attached as **Exhibit B.**

26 17. This letter stated:

27 “To Whom it May Concern,

28 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 of
Human and Sex Trafficking crimes.”

1 18. This letter looked very similar to the one I witnessed Illma work on in or around
2 April to May 2021, when I saw her transfer a signature from one document to another, and send
3 the finished letter to Wood.

4 19. Another item I saw on the broken iPad was a image of a document titled “Federal
5 Bureau of Investigation Receipt for Property” dated December 18, 2020. A true and correct copy
6 of that screenshot is attached as **Exhibit C**. At the bottom of the document, next to “Received
7 From” is Illma’s name and a signature, and next to “Received By” is the name “Elizabeth Farrell”
8 and a signature. This appeared to be the same document—and the same signature for Farrell—that
9 I saw Illma use in or around April to May 2021 to alter the letter she sent to Wood. This image
10 also reminded me of a conversation I had with Illma in approximately December 2020, in which
11 she told me she was investigating Warner; the FBI was involved; the “investigation” was getting
12 “serious”; and, accordingly, she expected to be very busy.

13 20. Another thing I saw on the broken iPad were at least two images of a checklist.
14 One checklist was blank, and others were filled in. A true and correct copy of two such images
15 are attached as **Exhibit D**.

16 21. Another series of items I saw on the broken iPad were pictures of emails and text
17 messages from Ashley Walters that contained email addresses, social media logins, passwords,
18 addresses, social security numbers, and other personal information about Warner.

19 22. Around this same time, I also looked through the items Illma had left in the garage
20 upon leaving for Florida, including unorganized and/or crumpled stacks of papers and other trash.
21 One item I saw in these discarded materials was a piece of paper covered with what appeared to be
22 my sister Illma’s handwriting, which I recognized. A true and correct copy of that document is
23 attached as **Exhibit E**.

24 23. Another item I saw in these discarded materials was a notebook filled with what
25 appeared to be my sister Illma’s handwriting, which I recognized. A true and correct copy of one
26 page from that notebook is attached as **Exhibit F**.

27 24. In or around early November 2021, I participated in a phone call over the Signal
28 app with Wood, Dinse, and Dinse’s mother. We used Dinse’s phone. I observed that Wood’s

1 Signal nickname was Alabama. I recognized her voice and she identified herself as Wood. Wood
2 wanted to discuss what had happened while Illma was living at our house. According to Wood,
3 Gore said I had died three months prior. I said I was not dead.

4 25. The conversation moved to what I saw on the broken iPad and in Illma's discarded
5 items. I told Wood that I had seen a letter supposedly written about her by an FBI agent, and
6 earlier that year, I witnessed Illma doctor the same or a similar letter—in other words, that I knew
7 the letter was a fake. Wood's response shocked me. She said the letter was so important to her
8 work against Warner, and told me to "think of what would happen" to her and the "victims" if this
9 ever got out to the media. I offered to send Wood or her attorneys these materials but she
10 declined.

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

13 Executed on this ^{7/19/2022} day of July, 2022, at Gilroy, California.



14
15 DocuSigned by:
Bryton Gore
16 Bryton Gore

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EXHIBIT A

December 20, 2020
12:31 PM



< **A** Alabama @  

Whoa I never seen this one
Nov 21 6:41 PM

424-489-1211 is my new number
Nov 21 9:08 PM 

Sun, Nov 22

Here is the letter
To Whom it May Concern:

Please be advised that Ms. Evan Rachel Wood is one of the primary witnesses in connection with an impending criminal prosecution in Los Angeles involving an international and well known public figure. We have advised Ms. Wood that in our opinion it is in her and her family's best interest to not be in Los Angeles at the time of this individual's arrest and the criminal proceedings. The safety of Ms. Wood, her son, Jack as well as the other victims and their families are of our utmost concern during this time.

Whatchu think?
Nov 22 8:17 AM

It's good

I don't know about the letter stating the arrest before it happens 

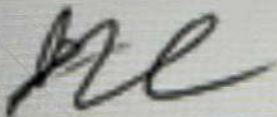
+ New Message   

EXHIBIT B

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.



Federal Violent Crimes Department
Michelle Langer
(949) 202-REDACTED

GUILLERMO SANTISO
DEPUTY DISTRICT ATTORNEY
gsantiso@da.lacounty.gov
(760) 473-7753

Sergeant Jeffrey Walker
Special Victims Bureau
LOS ANGELES REGIONAL
HUMAN TRAFFICKING TASKFORCE
(323) 526-5130

EXHIBIT C

UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
Receipt for Property

Case ID: 305-LA-71
On (date) 12/18/2020

item (s) listed below were:
 Collected/Seized
 Received From
 Returned To
 Released To

(Name) Julia Goss
(Street Address) FBI LAFO
(City) _____

Description of Item (s): 1 Box containing 400 (4) Borden (Wounded) /
1 folder "over the wall"
1 copy of a newspaper article

Received By: [Signature]
(Signature)
Printed Name/Title: S. E. [Signature]

Received From: _____
(Signature)
Printed Name/Title: Julia Goss

EXHIBIT D

NAME:
CONTACT:
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 DOESNT 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:

NAME: GABRIELLA
CONTACT: (415) 767-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

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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:

EXHIBIT E

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 ~~staying~~ ~~was there 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~~ ^{but} I wasn't
~~allowed to leave~~

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

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

~~threatened me when I asked who he was texting~~
~~he ignored my crying and sat on 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 ~~return~~ ^{think of a}
a way to ~~leave~~ escape

accept his apology

~~lost his keys~~
move ~~passed~~ this together

~~lost his keys~~
his ~~keys~~ ~~hard~~

he loves me

and I trust him

~~know~~ to find a way to ~~get out~~
^{because}

Kepeats back to
we connected over ^{the} same
~~little~~
when I needed help

EXHIBIT F

Goal

why: because I am
my plan is good
and my art is unique
you can sell for
millions with strategy
this is proven
- Damien Hirst
- Warhol
- Gogh

ultimately
to make
more art

create a personal
brand

- you are unique
- interesting
- and have weird interesting perspectives
- stand by them
- admit when you're wrong

- Paint:

- you are talented
- to excel

- Phoenix act

- to protest
- to make money doing that

