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

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 PAULA M. WEISS**

Date: July 22, 2022

Time: 8:30 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 PAULA M. WEISS**

I, Paula M. Weiss, 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. I have known Brian Warner p/k/a Marilyn Manson since the early 1990s. During that time, I knew Manson as a social acquaintance. I am a model and actress and have gone by the name Pola Weiss in my professional life.

3. In approximately 1996, I was living and working in Los Angeles. I went on a casting call for a music video. I was cast for the role. When I arrived at the shoot, I was seated next to Manson at hair and makeup. The video was for his song “Long Hard Road Out of Hell.” We became friendly during the shoot, and thereafter engaged in a romantic relationship for roughly a few months. During this time, I became close to Manson and his band, and spent time with them at Manson’s home in Hollywood. Manson was never physically, emotionally, or sexually abusive towards me.

4. During the same period in approximately 1996 when I was seeing Manson, I acted in a film by Manson called “Groupie.” I was approximately 21-22 years old at the time. Before the film was shot, Manson and I discussed his burgeoning interest in filmmaking. We discussed his concept for the film and some high-level dialogue that he had drafted. The film would be shot at his house. We agreed that I would play a crazed fan, *i.e.*, the “groupie,” who found out where Manson lived and was bringing him a piece of art. His bandmates would be at the house when I rang the doorbell. The scene was then to devolve into a scary game of truth-or-dare straight out of a horror film. Only he and I would be in on the plot, and part of the concept was to capture the reactions of his bandmates and other people who were in the house.

5. Before, during, and after the film shoot, I knew what I was doing and was totally comfortable with it. I fed on the energy of the shocked crowd and hammed it up for the scene. I felt completely and totally safe during the filming with Manson. I did not feel degraded, humiliated, exploited, or abused. It was acting, make believe. In fact, I felt like I was able to give

1 into the character and further develop my acting skills. I considered this film to be a professional  
2 job. It was a paid job, and the film was shot by acclaimed director Joseph Cultice.

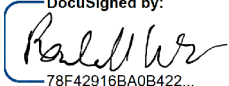
3 6. I have seen the documentary of Manson’s 1996’s tour titled “Dead to the World,”  
4 which was also directed by Cultice. A short clip of the “Groupie” film I acted in was used in the  
5 documentary, and I was thanked in the credits (“Special Thanks . . . Pola Weiss”).

6 7. Any statements that I was under the age of 18 at the time “Groupie” was filmed,  
7 that “Groupie” depicted or constituted child pornography or abuse, or that I was dead or killed are  
8 unequivocally false.

9 8. I have never been contacted by Illma Gore or Evan Rachel Wood regarding my  
10 relationship or work with Manson.

11 I declare under penalty of perjury under the laws of the State of California that the  
12 foregoing is true and correct. 07/20/2022 San Francisco, California  
7/20/2022

13 Executed on this \_\_\_ day of July, 2022, at \_\_\_\_\_, \_\_\_\_\_.

14 DocuSigned by:  
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16 78F42916BA0B422...  
Paula M. Weiss \_\_\_\_\_

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